

SITE ADDRESS: Land East of New Inn Road, Bartley, SO40 2LR

PROPOSALS: 10no. new dwellings; relocated vehicular and pedestrian access; associated parking and landscaping
(AMENDED PLANS – ADDED TO PLANNING PORTAL ON JULY 10 2023)

Our views on the above application are:

4. We recommend **REFUSAL**, for the reasons listed below:-

- Policy SP28 – Rural Exception Sites. We do not believe that the following conditions have been met:-
 - a. NFDC Housing have identified a need for a number of one bedroom units and none are proposed. Whilst it is possible that a two bedroom unit will be offered to fulfil a need for a one bedroom unit the occupier will be expected to pay the two bedroom rent which would seem to defeat the objective of Affordable Housing. The difference in LHA rents between a 1- and 2-bedroom property is almost £2000 per year and this may cause additional financial impact to the tenant. In addition, we have not seen evidence of the tenant vetting process which would ensure the housing is only for local residents both initially and in the longer term. There is also concern regarding the longer term aspects of shared ownership and whether this is financially viable for people and if there is a market for resale within the local community.
 - d. One small local convenience shop and a minimal level of public transport. Several other large scale Affordable Housing developments have recently been approved in neighbouring parishes/towns (Ashurst, Netley Marsh, Totton) with greater links to local services, public transport etc.
- Policy DP18 - Design Principles – The design fails to meet the following conditions:-
 - a. Enhancing the built environment of the New Forest (see comments re SP17)
 - b. Creating a safe environment... (we have concerns about increased traffic movements in an already busy location, especially during school times. The applicants traffic survey was conducted during the COVID lock-down period where roads were substantially quieter and the schools were closed)
 - c. Ensuring new development is accessible where appropriate (we have concerns that the level of fall needed to work with site ground levels will make accessible levels of access between plots, parking spaces and rear gardens of a number of units very difficult to achieve)
 - d. Ensure all new development incorporates sound sustainable design and construction principles.
 - e. Ensuring development is contextually appropriate and does not harm visual features... (see comments re SP17)

In addition, we are concerned about building height and location in relation to neighbouring properties. It would appear from the amended plans that the proposed buildings nearest to Oakfield Road have moved closer to the southern boundary of the site, is this possibly to allow for further development of the site at a later date?

- Drainage and risk of flooding - Whilst we note that the developer has moved away from the original proposed SUDS method to now linking into what we are told are existing watercourses, we remain concerned that this will be insufficient to cope with the high level of surface water that currently drains down and across the site. Some of the watercourse runs across land east of and outside of the ownership of the developer and we are concerned as to how they will be able to secure and protect the route of this proposed drainage option.

The likely impact of failure of the proposed method will be felt by existing residents of New Inn Road, Oakfield Road and Chinham Road. The latter has historically been affected by surface water flooding, the latest occasion being the winter of 2013/14 when a number of properties were significantly impacted.

Levels of ground water saturation were measured by the developer's consultants during one of the driest summers on record and still found to be high. Standing water in trenches dug by residents south of the site has shown that a high water table exists all year round.

Although HCC as the Lead Local Flood Authority supports the proposed method we are not satisfied with its answers to a number of our questions regarding this matter (see Appendix 1 attached) and remain unconvinced that surface water drainage issues will not be made worse as a result of the development.

- Sewerage. Existing infrastructure is poor and overloaded. It would appear from reading the consultation response from Southern Water dated August 30th 2023 that they have yet to receive details from the developer of exactly how sewerage/foul water from the site will be dealt with. Reference is though made to a sewer running across the site the ownership of which needs to be ascertained.
- Policy SP17 - Local distinctiveness. The proposals put forward by the developer for the site are the opposite of what is around it. Whilst the development is not within the Forest North East Conservation Area it sits very close to it.
- Public transport. Lack of local services. The existing bus service only runs on two days of the week. HCC have already publicly indicated that they continue to review their ability to support/subsidise the service and without this support it is highly likely that the service would cease.
- Ingress/egress from the site – Based on the plans we are concerned that the size of the entrance/exit to the site is insufficient for larger vehicles and believe that they would need to utilise a wider sweep across New Inn Road to enter the site. This would impact on other users of the road and may necessitate parking restrictions that currently do not exist.

Additionally, despite submitted drawings to the contrary, we have concerns that to create the required level of visibility splay it may be necessary to fell a protected tree on the eastern side of New Inn Road.

- Parking – Whilst the number of parking spaces proposed would appear to meet the required standard there would appear to be little scope for the parking of additional vehicles.
- Ecology – It would appear that no review of the applicants Ecology Assessment Report has been undertaken by the NFNPA Ecologist. If this belief is correct then it is somewhat disappointing that this is the case given the existing greenfield nature of the site.
- Trees – In his response dated September 12th 2022 (which no longer seems to be on the Planning Portal) the NFNPA Trees Officer said the following in summary:-

“Overall, the planning application appears to be take existing trees into account and I would likely support the application if further information regarding the above, tree protection plan and method statement should be provided before I am able to make a decision.”

None of this appears to have been received so the Trees Officer has yet to confirm support or objection.

- Future development – It is understood that the area of land which the applicant has an “option to purchase” is greater than the extent of the site on which they wish to build 10 new dwellings. It is believed to include an area to the north towards the boundary with The Haywain. Whatever the outcome of this planning application we would wish to see this valuable green space protected from development.

Signed DAVID RIGBY, Clerk to Copythorne Parish Council

Dated September 12th 2023

APPENDIX 1

E-mail (Aug 9th 2023) to and responses (Aug 30th 2023) from Hampshire County Council (as Lead Local Flood Authority) following their response to the Addendum to the Drainage Report for the Land to the east of New Inn Road (“the Haywain site”).

Dear Sirs

I am writing to you on behalf of Copythorne Parish Council in connection with the above planning application and in particular with regards to the attached document (*** see 1 at end**) submitted by the HCC Flood and Water Management Team to the NFNPA on June 30th 2023.

Copythorne Parish Council is a consultee to the planning application and as members of the HCC Flood and Water Management Team will be aware the Parish Council takes an active interest in matters relating to flooding in the Parish and in particular to issues affecting the village of Bartley.

A number of properties in the village have suffered historically from surface water flooding with many receiving grants from the Environment Agency in respect of future mitigation strategies. Indeed, we have only recently been supporting the Environment Agency with a Flood Resilience campaign as part of which a number of Bartley residents have signed up for property surveys paid for by the EA. These may lead to mitigation works again paid for by the EA

In compiling your response to the “Addendum to Drainage Report dated June 9th 2023” (***see 2 at end**) supplied to you by the applicant we are interested in your responses to the following questions:-

- Q. Has the HCC F&WMT undertaken a site visit to see for themselves the proposed watercourse deemed acceptable as a suitable method of dealing with surface water drainage post the development of what is currently undeveloped land to confirm that it has the capacity to cope with the expected levels of surface water without impacting on resident of existing properties in the local area (Oakfield Road, Chinham Road, etc.).
 - A. Given the number of planning applications we receive across the entire County, it is not possible for us to undertake site visits nor is there any requirement to do so.**

- Q. Has proof that the applicant has consent to utilise the proposed watercourse (some of is on land outside of their ownership) been supplied to the HCC F&WMT?
 - A. The applicant has been in discussions with the relevant landowner however there is no requirement for 3rd party agreement to be complete at this stage in the process. Permission would need to be granted before works were undertaken but this sits outside the planning remit.**

- Q. Is the HCC F&WMT content that the existing pipework that the watercourse will join under Chinham Road is of a sufficient capacity to cope with the level of water expected without impacting on existing properties in Chinham Road that have suffered historically from surface water flooding?
 - A. The applicant has demonstrated that the runoff leaving their site is no greater than that of a greenfield situation and thereby would not be increasing downstream flows. The proposed discharge rate is 1l/s (equivalent to 2 l/s/ha) for all storm events up to the 1:100 + climate change and when compared to the pre-development discharge rates of 5.9l/s/ha Qbar rate (equating to the 1:2 year storm, 13.4 l/s/ha for the 1:30 storm and 18.8 l/s/ha for the 1:100 storm this shows a substantial betterment over the existing situation. Although we can't confirm the capacity of the existing downstream drainage systems, the fact that they are proposing betterment on the existing situation with water being discharged in the same ditch as pre-development, this is considered in accordance with national policy and guidance and therefore not something we can object to.**

Q. If the method of dealing with surface water drainage which you consider acceptable should prove to be inadequate and flooding of properties occur who would be liable in respect of the inadequacies of the system.

A. **The drainage engineer undertaking the drainage design is responsible for the accuracy of the information they have provided and if found to be inaccurate would be responsible.**

Q. Will you be following all of the relevant Priority Area Policies contained within the "Test (Lower) Catchment Management Plan" in particular (but not limited to):-

Policy 2:- "Implement a more stringent approval process for all Ordinary Watercourse Consent applications. Each application will be considered on a site-by-site basis where further information and additional requirements may be requested by Hampshire County Council to ensure there will be no increase in flood risk. Where relevant, during the Ordinary Watercourse Consenting process, other organisations and internal teams will be consulted e.g., Natural England, the Environment Agency, the County Council's Biodiversity teams and Structures teams etc."

A. **Consent has not yet been submitted but this policy will be applied in line with our approved processes.**

Policy 5:- "Ensure that the Local Planning Authority only approve new developments that sufficiently demonstrate that a rigorous maintenance regime will be implemented for their surface water management systems. Developers will be expected to provide maintenance plans setting out maintenance schedules and maintenance responsibilities in line with the latest technical guidance. If adoption is proposed an agreement in principle should also be provided."

A. **This will be addressed via a planning condition**

Policy 6:- "Ensure that the Local Planning Authority requests verification reports from developers when construction is completed. These reports should contain as built plans and photographs of surface water drainage assets in situ to demonstrate correct construction has taken place. LPAs should also periodically review the construction of surface water management systems on new development to ensure it continues to adhere to best practice and industry standards."

A. **The guidance associated with these are not yet published and given the date that the application was submitted, it was deemed unreasonable to retrospectively apply this**

Policy 7:- "Make it best practice that a 50% betterment of surface water run-off rates is demonstrated for the surface water management features of any proposed development. This will ensure that developers take on the responsibility to ensure that their new developments do not flood on areas of previously developed land. Also, large areas of impermeable surfaces within new developments will be broken up improving infiltration, increasing biodiversity, and adding to provision of blue/green infrastructure, along with all the multiple benefits this offers."

A. **This is only applicable to previously developed (brownfield) sites so will not be relevant in this situation however there is a substantial reduction in runoff levels of 50% which would mean that they have complied with this policy regardless.**

Policy 11:- “Liaise with the Local Planning Authorities to limit permitted development rights regarding the paving or covering of permeable surfaces with impermeable surfacing. The use of alternative permeable measures such as gravel, grasscrete, permeable paving, etc to form driveways will be encouraged as these measures will fall under permitted development rights. However, those proposing impermeable driveways in Priority Areas will require planning permission. This will help limit the effect of urban creep.”

- A. We are liaising with all LPAs to limit permitted development rights however the adoption of this policy will be at the discretion of the individual LPAs. This also sits outside the planning approvals processes.**

(* 1 – LLFA response d/d June 30th 2023 to Addendum to Drainage Report d/d June 9th 2023)

(* 2 – Addendum to Drainage Report d/d June 9th 2023)