

The information, recommendations and advice contained in this report are correct as at the date of preparation, which is more than two weeks in advance of the Committee meeting. Because of these time constraints some reports may have been prepared in advance of the final date given for consultee responses or neighbour comment. Any changes or necessary updates to the report will be made orally at the Committee meeting.

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| Case Officer | David Stevens |
| Application No. | 20/00785/FULPP |
| Date Valid | 22nd October 2020 |
| Expiry date of consultations | 26th November 2020 |
| Proposal | Erection of 1 x 4-bedroom detached and 2 x 4-bedroom semi-detached dwellinghouses with associated access, parking, refuse storage, landscaping and ancillary works |
| Address | Development Site, Land at 'The Haven', 19 York Crescent Aldershot |
| Ward | Rowhill |
| Applicant | Mr S and H Sandhu |
| Agent | Harwood Savin Ltd |
| Recommendation | Refuse |

Description & Relevant History

The application site is located at the eastern end of York Crescent furthest (approximately 100 metres) from York Road. York Crescent is an unmade privately-owned road having two junctions with York Road.

The plot is of an irregular shape elongated in excess of 60 metres east to west; and measures approximately 0.16 hectares. It has a street frontage onto York Crescent of 12 metres, but broadens out to a maximum of 30 metres wide north to south towards the rear of the site. The site is formed from the curtilage of a detached bungalow ('The Haven', No.19 York Crescent) previously occupying the majority of the plot, which was demolished approximately 20 years ago, together with the rear portion of the rear garden of the adjoining property to the south, 'Tragorden', No.21 York Crescent. The application site is also adjoined to the south to the rear of the truncated curtilage of 'Tragorden' by 'Hartgill Cottage', No.23 York Crescent, which is a detached bungalow located set-back in a large plot away from the York Crescent frontage. To the north, the application site adjoins Nos.1-4 Green Acre, which are a terrace of three-storey town-houses forming part of a small cul-de-sac development of similar town-houses off York Crescent. Nos.16, 18 and 20 York Crescent are located opposite the site frontage. The eastern (rear) boundary of the site abuts the lower slopes of a wooded hillside (part of Cargate Hill), beyond which properties in Cargate Terrace, notably

including the Hamilton Court flats, are situated. The hillside is thickly wooded and contains a number of mature trees the subject of a Tree Preservation Order (No.387), some of which are located on the rear boundary of the application site. The site road frontage is currently enclosed with temporary Heras wire mesh fencing.

There has been a history of planning applications relating to 'The Haven', but also larger sites created in combination with 'Tragorden' and also 'Hartgill Cottage' since the early 1980s. Planning permission was granted in October 1981 for the demolition of 'The Haven' and erection of a detached house, RSH03274. However, a planning application for the conversion and extension of 'The Haven' bungalow to create 4 flats was refused in December 1982, RSH03274/1. Planning permission was then granted in April 1985 for the demolition of 'The Haven' and erection of a pair of semi-detached houses, RSH03274/2. Neither the 1981 nor the 1985 permissions were implemented and lapsed unused.

An outline planning application for the redevelopment of a combined site of 'The Haven', 'Tragorden' and 'Hartgill Cottage' for a 2- and 3-storey building comprising 32 sheltered housing units was refused in December 1988 and dismissed at appeal in January 1990, RSH05914. In the late 1990s there were a sequence of planning applications submitted on behalf of Barratt Homes in respect of a site formed from the combined curtilages of 'The Haven' and 'Hartgill Cottage' for the demolition of both dwellings and the erection of a 2- and 3-storey building comprising 15 X 1- and 2-bedroom flats, culminating in the refusal of 98/00360/FUL in October 1998. In late 2002 the Council served a s215 (Untidy Site) Notice to require the site owner to clear waste building materials from the land. Since then the site has been either partially or wholly cleared of waste materials on a number of occasions and the site frontage was, for a number of years enclosed with painted timber hoardings. The site was last used between 2013 and 2015 as a builders' compound whilst works were undertaken to extend 'Tragorden' on the adjoining land, following which the site was almost entirely stripped to bare earth. Since then the land has been allowed to re-vegetate and has largely remained unused and undisturbed to the present.

The proposal is for the erection of 3 X 4-bedroom three-storey houses on the site, comprising a detached house located in a frontage position adjoining the north side of 'Tragorden'; and a pair of semi-detached houses (Plots 2 & 3) located further towards the rear of the site. A tarmac private vehicular drive would be constructed to the north side of the proposed Plot 1 house from York Crescent to serve a shared turning area to the front of the Plot 2 & 3 houses behind Plot 1. The Plot 1 house would be provided with a rear garden area measuring 85 sqm; and the Plot 2 & 3 houses both with substantial side and rear garden areas totalling in excess of 200 sqm each.

The proposed new houses would have a conventional appearance with transverse-ridged hipped roofs reaching a maximum height of approximately 10 metres at the ridge; each with projecting subsidiary roof gable features to the front. In the case of the frontage (Plot 1) house the second floor would be partially within the roof. It is indicated that the external materials would be a mixture of facing brickwork and upper-storey painted render for the Plot 1 house; and facing brick and upper-storey timber cladding for the Plot 2 & 3 houses. It is indicated that interlocking concrete roofing tiles and uPVC window frames would also be used.

It is proposed to provide new boundary enclosures to the site; together with screen/boundary hedgerow planting. It is indicated that the road frontage boundary of the site to the front of the Plot 1 house parking would be planted to form a partial landscape screen.

The application is accompanied by a Design & Access Statement; Access Statement (i.e.Transport Report); Development Tree Report; Protected Species Walkover Survey Report; and a Badger Mitigation Survey Report.

The applicants are seeking to complete a s106 Planning Obligation to secure the necessary SPA mitigation and avoidance financial contribution to address SPA impact.

Consultee Responses

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| HCC Highways Development Planning | No highway objections: The planning application seeks the erection of three new four-bedroom dwellings. The dwellings would be entered from a new access off York Crescent which is a private unadopted road. In line with Rushmoor Borough Council (RBC) adopted parking standards I can confirm that the development provides 9 car parking spaces and sufficient turning within the curtilage of the site to meet the required standards. Cycle storage will also be provided within the site. The RBC refuse collection team should review the proposals and determine if a bin collection point will be required. Access sight lines have been demonstrated as 2.4 metres by 43 metres which is suitable for roads with a 30mph limit. From a highway perspective the potential traffic generation from three additional dwellings would not have a severe detrimental impact on the operation or safety of the local highway network. |
| Environmental Health | No objections subject to conditions and informatives. |
| Contract Management (Domestic Refuse Collection) | No objections. The developer will be required to purchase bins and boxes to store refuse and recyclables on each proposed house plot. However, as with the remainder of York Crescent and Green Acre, due to the uneven roadway surface, refuse and recyclable collections will be made from York Road, requiring residents to bag up their waste and move it to the collection point for collection days. |
| Aboricultural Officer | No objections : This proposal would have no adverse implications for amenity trees worthy of retention provided that the development is carried out in accordance with the submitted tree protection measures. |
| Ecologist Officer | Objection : The proposals fail to provide adequate survey information concerning protected species, notably badgers and bats. Furthermore, the proposals fail to provide adequate mitigation for biodiversity loss. The proposals thereby fail to comply with adopted Local Plan Policies NE2 and NE4 and Government Planning Policy & Guidance concerning ecology and biodiversity matters. More survey information and proposals for appropriate mitigation measures are required. |
| Natural England | No objections subject to an appropriate SPA mitigation and avoidance financial contribution being secured with a s106 Planning Obligation. |
| Hampshire & I.O.W. Wildlife Trust | No comments received within the consultation period, thereby presumed to have no objections. |

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| Thames Water | No comments received within the consultation period, thereby presumed to have no objections. |
| South East Water | No comments received within the consultation period, thereby presumed to have no objections. |
| Scottish & Southern Energy | Refers the Council to their web-site for network information. |
| Hampshire Fire & Rescue Service | No objections and provides generic fire safety and precautions advice. |
| Neighbourhood Policing Team | No comments received within the consultation period, thereby presumed to have no objections. |
| Parks Development Officer | No objections and provides details of the POS projects for which a s106 POS financial contribution is required. |

Neighbours notified

A total of 70 individual letters were posted on 5 November 2020 (with a reply date to the notification period of 26 November 2020) to: Nos.1, 3, 5, 7, 7A, 7B, 8, 9, 9A, 10, 11, 11 Bottom Flat, 12, 13, 13A, 14, 15, 16, 17, 17 First-Floor, 18, 20, 21, 21A, 21B, 22, 23, 24, 25, 27, 29, 31, 33, 35, 37, 43, 45 & 47 York Crescent; Nos 1-17 inclusive Green Acre; Nos.1-12 inclusive Hamilton Place, The Patch & Oakwood Cargate Terrace; and No.34 Church Lane West. This includes all properties directly adjoining the application site and all properties in York Crescent and Green Acre.

The Council subsequently agreed to an email request from the Residents of York Crescent Association 2020 to extend the notification period until 17th December.

Neighbour comments

At the time of writing a total of 32 objections have been received from the occupiers of: Nos.8, 10, 12, 14, 15, 16, 18, 20, 22, 23 (twice), 24, 27, 29, 33 & 35 York Crescent; 1, 2, 5, 7 (twice), 8, 9, 13 & 17 Green Acre; The Coach House, Cargate Terrace; Hillside Cottage (No.38) Church Lane West; 8 Amberley Grange; 18 Martingale Court; and 442 Selborne Avenue; and Cllrs Sheehan (Rowhill Ward) and Roberts (Aldershot Park Ward). Objection is raised on the following summary grounds:-

- (a) Gross excessive overdevelopment in an already over-populated area : the proposals reflect the level of greed of the developer, not what is thought best for the site and local residents. The proposals would generally exacerbate existing problems experienced by neighbours and place an unreasonable burden on York Crescent residents. If at all, the site is only considered appropriate for the erection of a single detached 2-storey frontage house;
- (b) Aldershot has seen massive increases in residential development – with no consideration for existing residents. Existing infrastructure is/would be unable to cope;
- (c) Further depletion of water supplies in an area that the Environment Agency identify

as being under water supply stress;

- (d) The proposed development is not wanted or needed : the Council's targets for new housing are already met elsewhere – or should be met elsewhere. There are more suitable sites for high density housing elsewhere. This is unnecessary town cramming;
- (e) The proposals are not good quality design : the design of the proposed houses is poor and unimaginative;
- (f) Unacceptable backland development;
- (g) The proposed development is unsustainable development according to Government guidance and advice;
- (h) Loss of green space;
- (i) The land at the application site should be classified as 'brownfield' land [*Officer Note: the application site is brownfield previously developed land, having previously been the site of a residential dwelling known as 'The Haven'*];
- (j) Proposals would appear stark and out of character with the area and neither follow the existing aesthetic nor pattern of development in the vicinity due to lack of properly enclosed front garden areas with buildings set back appropriately from the road. There is no space for landscaping and proposed landscaping proposals inadequate. These failures contravene Government guidance on various Government sites;
- (k) The proposed houses are substantial in size, yet would have limited size plots. The garden areas would be minimal, small and dominated by hard surfaces, including car parking; and unduly shaded by TPO trees. A poor living environment would be provided for residents contrary to Government policy, guidelines and standards; nor conform to Council standards. There would be likely 'future resident pressure' for drastic pruning works to be undertaken to adjoining mature TPO trees - to their detriment;
- (l) The windows in the proposed houses are too small (it is suggested that this is to avoid undue overlooking of neighbours), resulting in inadequate light and air for residents : an unacceptably dark and cramped accommodation would be provided;
- (m) No space available within the proposed house plots for the houses to be extended or altered in the future to meet residents' needs;
- (n) The proposed houses are not designed to promote well-being of occupants in their home environment : health & safety and mental health impacts in this respect have become more important as a result of Covid pandemic;
- (o) The proposed houses are too tall and bulky – 3-storeys are out of character with the area, where bungalows and 2-storey houses predominate. Although 'Tragorden' (No.21) York Crescent is of 3-storey height this is not an example to follow : there are no other 3-storey buildings in York Crescent;
- (p) The site is located adjoining the Cargate Avenue Conservation Area and, as such, should (but does not) maintain a certain style;
- (q) Inadequate on-site parking provision, including parking spaces that block each other, lack of visitor parking space(s) and turning space provisions contrary to Council policy, thereby likely to lead to additional overspill on-street parking in York Crescent & Green Acre; obstruction of access to existing neighbours; and problems with emergency, tradesmen and delivery vehicle access;
- (r) More parking provision, beyond current standards, is needed now due to the impact of Covid;
- (s) A bonus room in the Plot 1 house should trigger a requirement for provision of additional on-site parking for this unit that is not provided;
- (t) The road frontage of the site is already blocked by overspill parking (including commercial vehicles) alleged to be by occupiers of the adjoining property (No.21 York Crescent); and also occupiers of properties in surrounding streets such as York Road, Ayling Lane and Church Road West. Displacement of this parking contrary to Council

policy and would, in any event, simply result in this street parking having to overflow somewhere else in the road;

- (u) The proposed vehicular access onto York Crescent would be unsafe due to poor visibility on bend, speeding vehicles, and adjoining parked cars;
- (v) Surrounding roads are already heavily congested;
- (w) A Transport Contribution is required according to Council policy – and in the absence of this permission should be refused;
- (x) No cycle parking provision;
- (y) Future residents of the proposed development would have no right of access to their houses, or to park in the York Crescent, because it is privately owned. A deed of grant would be required from other owners of the roadway for right of access [*Officer Note: these are not matters for the Council in the consideration of this application : it is a private property matter between the applicant and the other owners of the road. Furthermore, enforcement of any on-street parking restrictions that frontage owners of the road may wish to introduce would also be a matter for them. It is noted that at least one nearby section of York Crescent road frontage is already subject to private parking management*];
- (z) Increased traffic volumes using York Crescent : danger due to the bend at the end of the Crescent and because there are elderly/vulnerable residents in the road. Also children/young adults often play in the road. York Crescent is narrow, has an uneven surface and has no pavements, so pedestrians walk in the roadway. York Crescent cannot cope with any further intensification in traffic;
- (aa) Further damage would be caused to the un-made road surface of York Crescent – which is a private un-adopted road in a poor state of repair, with potholes and raised ironworks. It is not fit for purpose, has no streetlights and is compromised by excessive use and traffic speed/vehicle weight. The water supply (the pipes of which are buried in the road) is often cut-off. Other services buried in the roadway are also vulnerable to damage. The applicants do not repair/do not adequately repair the roadway. The ownership of the roadway is split between York Crescent residents : other residents have to foot the bill for repairs to the roadway on an on-going basis [*Officer Note: these are private property matters that can only be resolved between the applicants and the other private owners of the road : they are not matters for the Council in the consideration of this application*];
- (bb) Because the York Crescent roadway is privately owned, the Council has no right to grant planning permission for the proposed development, thereby increasing the usage and wear and tear on the roadway. [*Officer Note: the granting of planning permission does not supersede private property rights and, as such, if there are private legal reasons why the proposed development cannot proceed relating to the use of/potential damage to the roadway, this is a separate matter between the applicants and the other owners of the roadway*];
- (cc) The existing width of the York Crescent roadway at the site frontage is significantly narrower than is shown on historic documents such that some of the parking for the proposed frontage house (Plot 1) is located within what should be the legal extent of the roadway [*Officer Note: this is a private property matter for other owners of the roadway to take up with the applicants - in which the Council cannot become involved. The extent of the roadway shown on the submitted plans reflects the existing width of the roadway adjoining the frontage of the application site as has existed for some time*];
- (dd) The provision for refuse/recycling bins for the proposed houses is inadequate. Due to the existing state of York Crescent refuse/recycling bin collections for all existing properties in York Crescent and Green Acre by the Council are made from York Road, with residents required to pile up bin bags there for collection day : this is

- inconvenient and unhygienic. Bin bags are prone to attack by animals, causing litter;
- (ee) Loss of light and outlook to neighbouring and nearby properties – such as Nos.1-5 Green Acre. The adjoining property at No.21 would be hemmed-in by taller buildings and car parking;
 - (ff) Undue loss of privacy due to overlooking of neighbouring properties in York Crescent, Greenacre and Church Lane West;
 - (gg) Increased pollution, noise and disturbance. The occupiers of No.23 York Crescent specifically object to the parking proposed for the Plot 2 house being located in proximity to their rear garden patio area as a result of car fumes and possible cigarette smoke. Air quality issues generally due to dust being raised from the roadway by traffic;
 - (hh) Loss of, or threat to, mature trees, including TPO trees. Proposed dwellings would be located too close to trees. Trees are important in many ways and help combat pollution and soften views of development. There should be no felling of existing trees. Government guidance on TPO trees would be contravened. Some trees shown to be removed to accommodate the proposed development belong to the owners of neighbouring properties and written permission has not been obtained from them to do this [*Officer Note: this is a private property matter for the applicants to seek to resolve with the owners of the trees concerned*]. Unnecessary loss of wildlife habitat and greenery;
 - (ii) Environmental concerns : increased global warming during a climate emergency;
 - (jj) Concerns that the proposed houses are thought likely to be built and used as Houses in Multiple Occupation – with even further problems with population density, overspill parking, noise, disturbance and activity in the area. The proposed houses are considered to have too many wcs to be genuine houses. How can this be stopped?;
 - (kk) Adverse/Illegal impact on Badgers and an active Badger Sett on site : Badgers are comparatively rare in an urban context and would be put at risk by the proposed development during site clearance, construction and occupation thereafter. This would be a contravention of the Protection of Badgers Act 1992. The submitted Badger Survey was not undertaken at the optimum time and the recommendations are considered inadequate in terms of both assessing the extent of the impact and prescribing appropriate mitigation measures to correctly protect badgers and their habitat. The impacts on badgers of the construction period are not taken sufficiently into account and there is no confidence that mitigation would be provided and retained. A fox den and other wildlife on or near the site would also be adversely affected;
 - (ll) Damage to SSSI's [*Officer Note: this comment did not specify what the damage would be; however the application site is not, and does not adjoin, a SSSI*];
 - (mm) Light pollution from the proposed houses if built and occupied would be likely to disturb badgers, thereby putting occupiers in breach of the Protection of Badgers Act 1992;
 - (nn) Increased risk of flooding, soil erosion and land instability. Land to the front of No.23 York Crescent already has boggy poor drainage. The York Crescent roadway is already damaged due to the erosion of surface water flows – which can wash material out onto York Road. Permeable paving is not appropriate on sloping ground and the application lacks appropriate drainage proposals;
 - (oo) The proposals are in contravention of the Rushmoor Housing & Homelessness Strategy; the National Building Specification and a 2016 report on High Density Housing in London [*Officer Note: None of these documents are Government or Council planning policy or guidance documents adopted for the purposes of considering and determining planning applications : as such, these documents cannot be taken into material account in the consideration of the planning application*];

- (pp) The proposed development fails to comply with covenants prohibiting buildings being located within 15ft of the York Crescent roadway [*Officer Note: This is a private legal matter in which the Council cannot become involved. Covenants are private legal restrictions placed on land that the Council has no rights to enforce : they are only enforceable privately. As a result, the existence of covenants can have no bearing on the Council's consideration and determination of planning applications on their relevant planning merits*];
- (qq) Substantial noise, disturbance, heavy vehicle traffic and activity (thought likely to damage the roadway and underlying services) during the construction period [*Officer Note: it is long-standing Government guidance that the impacts of the construction period of a development cannot be taken into account in determining planning applications. In any event, these matters are also private property matters between the applicants and the other owners of the roadway*];
- (rr) The applicants have not engaged with local residents;
- (ss) Loss of property value [*Officer Note: this is not a matter that can be taken into account in considering a planning application*];
- (tt) The applicants have used the application site for the dumping of materials and the site is potentially contaminated – and this should be assessed;
- (uu) Concerns regarding the identity of the applicants, including their character, past behaviour, likely future behaviour, workmanship, demolition of the original dwelling built on this site, and ownership of the adjoining property at No.21 York Crescent [*Officer Note: planning law cannot allow allegations regarding the applicants or their likely future behaviour to affect consideration of planning applications on their merits*]; and
- (vv) Concerns regarding the applicants' ownership, development and use of No.21 ('Tragorden') York Crescent : Firstly, it is alleged that it is an unregistered HMO; and secondly, that it does not resemble the original plans approved in 2012, is 'now a three-storey development' and that this has happened 'without challenge by RBC'. It is also alleged that the property has inadequate parking provision; that there are existing overspill street parking problems associated with the use/occupation of No.21; that the property is poorly built/extended/maintained by the applicants; there are existing problems with noise and disturbance associated with the use/occupation of No.21.; and the rear yard of No.21 is not grassed/planted with vegetables as shown with the survey plan submitted with the current application. The applicants neglect to remove ivy from trees and to replace/repair dilapidated fences at No.21.

[Officer Note: The Council must consider the acceptability or otherwise in Planning terms of the proposals the subject of the current planning application : the planning status of the adjacent property at 'Tragorden' is not under consideration with the current application. Furthermore, the current application is not the appropriate 'vehicle' with which to investigate any issues associated with the use/occupation of No.21. There is no requirement for an applicant to accurately portray properties beyond the defined application site when making a planning application.

To date no breach of planning control on the site has been brought to the Council's attention and gone unchallenged in respect of 'Tragorden'. This adjoining property has a lengthy planning history which includes the following:-

- In 1991 'Tragorden' was the subject of enforcement action against unauthorised change of use to two flats;*
- This was the subject of an appeal which was allowed in 1992 since it was established that the flat conversion had already existed for many years at that*

time;

- *In 2001 an enforcement investigation was carried out by the Council in respect of alleged unauthorised HMO use. The property was inspected and found to be in its existing long-standing lawful use as two flats;*
- *In May 2012 planning permission was granted by Committee for extensions to the property (including a second floor element) to facilitate creation of a third flat, 12/00286/FULPP : this approved the third-storey of the existing building;*
- *This 2012 permission was implemented and followed by applications in 2013, 2014 and 2015 (13/00406MMAPP, 14/00612/NMA & 15/00328/NMA respectively) seeking retrospective approval for minor or non-material changes to aspects of the property and parking layout, all of which were considered and approved;*
- *The development as approved in 2012 featured a second storey element and there is no record of any subsequent complaint regarding the use, or development, of the property in any manner contrary to the 2012-2015 planning approvals. 'Tragorden' is, as it currently exists, as approved by the Council in 2012-2015;*
- *The allegations made prompted by the current application concerning unregistered HMO use have been investigated, however the property continues to be used and occupied as three self-contained flats as approved in 2012. The property is not registered as an HMO because it is not an HMO;*
- *The allegations concerning inadequate retained parking provision at No.21 also prompted by the current application have also been investigated. The 2015 permission regularised and approved the provision of a total of 5 on-site parking spaces comprising a garage (which has been built), together with a further 4 on-site parking spaces including a forecourt space in front of the garage. As a result of a number of visits to the application site, it appears that 5 vehicles are regularly associated with the use/occupation of No.21. Furthermore the spaces within the site as approved in 2015 remain available for the parking of vehicles, albeit that it appears that the occupiers may prefer to generally park only 3 vehicles on site, with the other 2 vehicles parked on street adjacent. A further 4-5 vehicles habitually seen from visits to be parked in the vicinity are not associated with the occupiers of No.21. No breach of planning control has been found to be taking place in respect of parking provision at No.21 and, indeed, as a result of occupiers of No.21 apparently preferring to park 2 of their vehicles in the street;*
- *The applicants/owners of No.21 are not obliged to maintain their property/trees/fences etc at the behest of the Council and/or neighbours : there is no breach of planning control in this respect.]*

Policy and Determining Issues

The site is located within the built-up area of Aldershot. The site is not located within a Conservation Area and it does not contain a Listed Building or is near one. The adjoining railway embankment is a 'green corridor'

Policies DE1 (Design in the Built Environment), DE2 (Residential Internal Space Standards) and DE3 (Residential Amenity Space Standards), DE6 (Open Space, Sport & Recreation), IN2 (Transport), NE1 (Thames Basin Heaths Special Protection Area), NE2 (Green Infrastructure), NE3 (Trees), NE4 (Biodiversity) and NE6-NE8 (Flood Risk and Drainage) of the adopted New Rushmoor Local Plan (2014-2032) are relevant to the consideration of the current application.

Also relevant is the Council's adopted Supplementary Planning Document (SPD) "Parking Standards" adopted in 2017. Since the SPD was subject to extensive public consultation and consequent amendment before being adopted by the Council, some significant weight can be attached to the requirements of this document. The advice contained in the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) is also relevant.

The proposals the subject of the application are too small in scale to require the submission of an Environmental Impact Assessment as an 'urban development project' under Schedule 2 of the Town & Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011.

In this context, the key determining issues are considered to be:-

1. The Principle of the proposals;
2. Visual Impact;
3. Impact on trees;
4. Impact on Neighbours;
5. The Living Environment Provided;
6. Highways Considerations;
7. Impact on Wildlife & Biodiversity;
8. Drainage Issues; and
9. Public Open Space.

Commentary

1. Principle -

The National Planning Policy Framework (NPPF) advises that the purpose of the planning system is to contribute to the achievement of sustainable development. In this respect, there are three dimensions to sustainable development: economic, social and environmental. These roles are defined as:-

- *"contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and co-ordinating development requirements including the provision of infrastructure;*
- *supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*
- *contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."*

The NPPF also advises that these roles should not be taken in isolation because they are mutually dependent, and the planning system should play an active role in guiding development to sustainable locations. Furthermore, it also advises that housing applications should be considered in the context of the presumption in favour of sustainable development to deliver a wide choice of high-quality homes, widen opportunities for home ownership and

create sustainable, inclusive and mixed communities.

The proposed development is seeking to make more efficient use of previously developed residential land, which, within reason, continues to be a clear objective of both Government planning guidance and current adopted local planning policy.

Whilst objection has been raised on the grounds that the proposed development is not needed for the Council to meet its adopted Local Plan targets for new housing development, Government guidance does not set this as the absolute limit of housing development to be built within the Borough within the Local Plan period (2014-2032). Furthermore, a proportion of the housing target set out within the Local Plan is based on assumptions about the provision of new housing on so-called 'windfall' or unallocated sites such as the current application site.

The current scheme proposes the provision of three new dwellinghouses. New Rushmoor Local Plan Policy LN2 requires 30% affordable housing on schemes of 11 or more dwelling units, subject to viability. However, since the scheme proposes fewer dwelling units than this threshold, the requirements of this policy clearly do not apply in this case.

The application site has previously been subject to unauthorised tipping/disposal of waste materials thought to have been derived from building sites elsewhere. The site has also been used for burning of other materials on large bonfires from time to time. The extent, nature and content of this material is unknown; as is the extent to which this material was or was not removed from the land when it has, occasionally, been cleared. Accordingly, given this previous history of the site, the Council's Environmental Health Team request that site investigation is undertaken to establish the existence/nature of any contamination and, if so, appropriate remediation. This can be required by imposition of standard planning conditions.

In the circumstances, the proposals are considered acceptable in principle (subject to all usual development control issues being satisfactorily resolved in detail), since the proposals are clearly in line with Government objectives and the Council's own adopted planning policies in principle.

2. Visual Impact -

It is Government planning guidance that, in assessing impact of proposed development upon the character and appearance of an area, this should be considered in the light of the impact upon the area as a whole. As a result, the existence of differences from neighbouring buildings are not likely to be sufficient to identify material harm on the character and appearance of an area. Indeed, it is extremely rare for the character and appearance of an area to be narrowly defined by a particular building type, age, size, height and overall appearance : the character of most urban landscapes is usually defined by an eclectic mixture of features and characteristics. In this case, the character of the area is mixed, comprising a range of conventional dwelling types, ages, designs, styles, heights, external finishing materials and, indeed, extent of alterations. Furthermore, the application site has been vacant, neglected and enclosed in a purely temporary and utilitarian fashion for a considerable period of time.

This existing character includes the presence of three-storey buildings which are located to both sides of the application site at 'Tragorden' and Green Acre. The difference in heights between them are solely due to the difference in the ground heights where each are built, since ground levels rise from 'Tragorden' across the site to Greenacre, which is built on the

highest ground. In this respect, the roof ridge of the Plot 1 house would be approximately 0.5 metres higher than that of 'Tragorden' and approximately 1 metre lower than the ridge height of Nos.1-4 Greenacre. With respect to the proposed Plots 2 & 3 houses, these are also of the same building height as the Plot 1 house and, although shown to be slightly-dug into the existing ground levels rising towards the rear of the site, would be built from a ground level approximately 1.5 metres higher than the proposed Plot 1 house in front. Consequently the proposed Plot 2 & 3 houses would be approximately 2 metres taller than 'Tragorden' and 0.5 metres taller than 1-4 Greenacre. However, it is considered that none of these differences in relative building heights would be at all significant and give rise to any material harm to the character and appearance of the area as a whole.

In part this is because the proposed houses would, where seen from within York Crescent, be viewed against the backdrop of the treed hillside behind. Furthermore, despite limited opportunities for the screening on the road frontage boundary of the application site, it is not considered that the application site makes a particularly significant contribution to the character and appearance of the area in any event. The site is located at the far end of a private road where it does not become readily visible until close to the corner at the end of the Crescent and, if at all visible, the site is generally only partially seen; and from some distance away along either arm of the Crescent. In this context, it is considered that the proposed development would have a limited visual impact and is otherwise of an acceptable design. As such the proposed development is not considered to give rise to material harm to the overall visual character and appearance of the area.

Objection has specifically been raised on the basis that part of the development comprises backland development. However proposed development is not intrinsically unacceptable simply because elements of a proposed scheme are located away from a road frontage behind other development and can be described as being 'backland'. Indeed, it is noted that there are other examples of dwellings similarly located behind the road frontage in the vicinity. In any event, it is not considered that any material planning harm arises in this case from the layout of the proposed development and how it relates to existing adjoining and nearby development.

Whilst the rear boundary of the application site abuts part of the boundary of the Cargate Avenue Conservation Area, the application site would not be readily, or at all visible, from publicly accessible locations within the Conservation Area. The application site is located at a notably lower ground level beyond a substantial treed slope from publicly accessible parts of the Conservation Area. As a result it is not considered that any material and adverse harm to the visual character and appearance of the Conservation Area would arise.

The design and external appearance of the proposed houses is considered to be entirely conventional and acceptable. It is considered that the proposed development would be appropriately sympathetic to the already varied pattern of development and built form of the area.

It is not considered that the proposed development would materially and harmfully affect the visual character and appearance of the area and trees worthy of protection. It is therefore considered that the proposals are acceptable in visual terms.

3. Impact on Trees -

A Development Tree Report has been submitted with the application that examines and assesses the quality of all trees on or adjoining the site, the likely impact of undertaking the

construction of the proposed development, tree protection measures to be in place for the duration of the site clearance and construction period of the development, and the potential for impact on the trees in the longer term due to possible 'future resident pressure' once the proposed houses are occupied, including any specific elements of the design of the current scheme that would mitigate such impacts.

The side and rear margins of the application site are partially screened by trees, including a stand of substantial mature trees situated on the east (rear) boundary the subject of a TPO. The TPO trees have root protection areas and canopies that extend some way into the site and are either Category A or B trees. There are also a small number of younger non-protected Category C or R trees located along the side boundaries of the site to the north and south, some of which are located outside the ownership of the applicants; and the canopies and rooting areas of these other trees are smaller and extend less into the site.

The proposed development has been designed to provide adequate separation from all trees and no protected trees are proposed to be removed as a result of the proposals. It is proposed that special foundation construction be used for those parts of the proposed construction of the Plot 2 & 3 houses that slightly impinge into the rooting zones. Combined with the implementation of tree protection measures for the duration of the construction period, it is considered that no undue harm should arise to trees to be retained as a result of the construction of the proposed development.

Although the submitted Site Layout Plan indicates that two younger trees located to either side of the site would be removed, the removal of these trees is not necessary to enable the development to proceed since the canopy and rooting zones would not be affected by the proposed construction. Nevertheless, whether or not they are actually removed, it is not considered that these trees make any material contribution to the character and appearance of the area nor, indeed, that they are considered worthy of retention, or could be retained. They are not subject to a Tree Preservation Order and nor would they be worthy of such protection. To a degree they would undoubtedly help soften and screen the proposed development from the adjoining neighbours at Nos.4 Green Acre and 23 York Crescent. As such, in planning terms it is considered that any potential concern regarding the impact of the possible loss of these boundary trees solely arises from the potential loss of screening and the implications that this may have for the impact on the neighbouring properties concerned: this is to be considered in the next section of this report.

In the case of the No.4 Green Acre tree indicated to be removed, this appears to be owned by this neighbouring property. However this tree overhangs the boundary of the application site such that, in civil law, it is understood that the applicants would be entitled to remove the overhanging parts provided that they offered the cuttings back to the owner of No.4. Any damage to the roots of this tree arising from the construction of the proposed development, or generally to the health and stability of the tree arising from any cutting back, would also be solely a private property matter between the applicant and the owner(s) of No.4 Green Acre.

It is considered that the potential for 'future resident pressure' longer-term impact upon the health and stability of trees following the occupation of the proposed development has also been satisfactorily addressed by the design of the scheme. The proposed Plot 2 & 3 houses are both provided with private amenity space in significant excess of what is required according to adopted planning policy requirements to compensate for the potential shading impact of the trees. Furthermore, the houses are spacious internally and designed to have dual aspect to the main living rooms. In the circumstances, it is not considered that any concern about future resident pressure is sufficient to justify the refusal of planning

permission in this case.

The Council's Arboricultural Officer is satisfied that the existing trees would be adequately protected from harm during the construction period. Furthermore, whilst it can be a matter of concern that 'future resident pressure' may arise where existing trees are located adjoining or within proposed new house plots, whereby undue pressure would be brought to bear on the Council to allow inappropriate works to trees in the future, the Council's Arboricultural Officer raises no objections to the proposals. The most significant trees concerned are, in any event, protected by the TPO such that it would be an offence for future occupiers of the Plot 2 & 3 houses to undertake any works to these trees without the prior written consent of the Council following the submission of an application for TPO consent. Subject to the imposition of conditions requiring the proposed special foundation construction be implemented in full, and the prescribed tree protection measures are implemented and retained as specified for the duration of the construction period of the proposed development, it is considered that the proposals are acceptable having regard to Policy NE3.

4. Impact on neighbours -

The existing long-standing disuse and utilitarian enclosure of the application site, unresolved status, in addition to uncertainty about the future development and use of the site, have been matters of concern to local residents for many years.

A number of amenity concerns have been raised by objectors, predominantly in respect of loss of light and outlook; the potential for loss of privacy due to undue overlooking of adjoining and nearby residential properties in York Crescent, Green Acre and Church Lane West; and also concerns about undue noise, disturbance, activity and fumes.

When considering impacts upon neighbours, the basic question for the Council to consider is whether or not the impacts of the proposed development on the residential amenities of neighbouring properties would be both materially and harmfully impacted in planning terms. The correct test in this respect is whether or not existing neighbouring properties would, as a result of the proposed development, maintain acceptable amenities to meet the needs of residential occupation. It is not the role of the Planning system to defend neighbours against the loss of any private views from their properties where these views are derived from over adjoining land not in their ownership. In terms of privacy concerns, a degree of mutual overlooking often exists between neighbours and this is considered both normal and acceptable. It is necessary for the Council to consider whether or not occupiers of neighbouring properties would be subjected to unacceptable undue overlooking rather than any overlooking at all. Overall, it is the role of the Planning system to consider and decide whether or not neighbouring and nearby residential properties would continue to possess an acceptable living environment for occupiers in planning terms as a result of a proposed development.

In this context, whilst the application site is surrounded by existing residential property, most is somewhat removed from the proposed development by any combination of separation distance, orientation, different ground levels and intervening screening vegetation and other means of enclosure. As a result, it is considered that, with the exception of Nos.21 & 23 York Crescent to the south side, Nos.16, 18 and 20 York Crescent on the opposite side of the bend at the end of the Crescent, and Nos.1-4 Green Acre to the north side, no other neighbouring properties could be materially and harmfully affected by the proposals.

The impacts upon those nearest and/or adjoining residential properties identified as being

conceivably materially impacted by the proposed development are considered in the following paragraphs:-

'Tragorden' (No.21) York Crescent: This adjoining property is in authorised planning use as three flats and the proposed Plot 1 house would be located alongside to the north with a conventional relationship, with both properties having windows facing the front and rear. No windows are proposed for the side elevation of the Plot 1 house facing the side elevation of No.21 such that this relationship is considered to be acceptable. The proposed Plot 2 & 3 houses would be separated by in excess of 20 metres from the rear elevation of No.21, such that no material and undue overlooking would arise from this direction. The provision of parking for the Plot 1 house does not impinge upon the parking area required to be retained for provision of on-site parking to the front of No.21. It is considered that the proposed development would have an acceptable impact upon No.21 in planning terms.

No.23 York Crescent: This neighbouring property occupies a large triangular-shaped plot to the south of the application site and the dwelling is an extended bungalow situated set back from the York Crescent frontage behind the buildings on the adjacent plots to either side at Nos.21 and 25 York Crescent. Ground levels within No.23 site rise towards the rear in a similar to the change in levels within the adjacent application site. The bungalow is, however, dug into the slope such that the dwelling itself on this plot is at a lower level than land at the application site. The bungalow is also sited facing at an angle away from the boundary with the application site. The No.23 plot borders the application site to the rear of No.21 and, as such, shares a boundary with the proposed Plot 2 house. As such, it is considered that No.23 could not be materially affected by the proposed Plot 1 & 3 houses, since these do not directly adjoin and are somewhat distant.

In terms of the relationship with Plot 2, the closest separation building-to-building between the two dwellings would be approximately 22 metres at an oblique angle, with No.23 at a noticeably lower level. Although there are some secondary ground floor windows serving living rooms in the side elevation of the bungalow, it is not considered that any windows in the proposed Plot 2 house would materially overlook them due to the separation distance, and proposed/existing boundary enclosures and trees. Since the bungalow at No.23 is located within a large plot to the south and faces at an angle away from the application site, it is not considered that the proposed development could give rise to any material and adverse impacts upon amenity in terms of loss of light and outlook. There is existing fencing and some trees located along the lower half of the shared boundary providing a degree of mutual ground level privacy between the properties, however there is no effective fencing on the shared boundary further up the garden. Nevertheless, new boundary fencing is to be provide with the development and a planning condition can be used to require provision and retention of new or existing boundary enclosures to provide an adequate and acceptable level of mutual ground level privacy for occupiers of both properties. This is considered to be the case whether or not the current intervening trees and shrubbery partially screening the boundary with the neighbours were to be wholly or partially removed or damaged as a result of the proposed development.

Although the occupiers of No.23 have specifically objected to the provision of the parking spaces for the Plot 2 house in proximity to an existing patio area at their property as a result of potential nuisance and health effects from vehicle fumes it is considered that this concern is unlikely to be so persistent, significant and unusual within a residential context as to justify the refusal of planning permission.

It is considered that the proposed development would have an acceptable relationship with

No.23 York Crescent I planning terms.

Nos.16, 18 & 20 York Crescent: These neighbouring properties are opposite the application site frontage to the west and, as such, the amenities of occupiers could only conceivably be materially affected by the front of the Plot 1 house and the use of the driveway serving the proposed development. In this respect the closest building-to-building relationship between the front windows of the Proposed Plot 1 house would be with No.16 York Crescent, at a separation distance of approximately 24 metres, with Nos.18 & 20 even more distant. It is also noted that these properties are enclosed behind substantial hedging. In the circumstances, it is considered that no undue and material impacts on the amenities of occupiers of these neighbouring properties would arise.

Nos.1-4 Greenacre: These are a terrace of three-storey townhouses that are situated to the north side of the application site on ground at a slightly higher level than the application site. These houses have their rear elevations with the rear gardens (and in the case of Nos.1 & 2, an electricity sub-station enclosure) in-between facing the north side boundary of the site. There is a semi-mature tree located close to the rear boundary of No.1 Green Acre providing a degree of screening of this property to/from the application site. Nos. 2 & 3 Green Acre would face directly towards the blank flank elevation of the Plot 1 house with a building-to-building separation distance of approximately 17 metres with the internal driveway serving Plots 2 & 3 in-between. No.4 Green Acre has a more oblique relationship with the Plot 1 house with a slightly increased building-to-building separation. An even more oblique and distant relationship would arise between Nos.1-4 Green Acre and the Plot 3 house. It is not considered that these relationships would give rise to any undue loss of amenity to occupiers of Nos.1-4 Green Acre as a result of loss of light and outlook. Because the majority of the windows in both the Plots 1 & 3 houses would face towards the front and rear perpendicular with the Green Acre properties it is not considered that any material and undue overlooking of these neighbouring houses and gardens would occur. Although the side elevation of the Plot 1 house would have small first- and second-floor windows serving the stairway in the side elevation facing towards the Green Acre properties, it is considered that any possibility of overlooking from these windows can be eliminated by requiring that the windows be permanently obscurely glazed. There is an existing 'patchwork' of boundary fencing enclosing the north side boundary of the application site shared with Green Acre properties, although the applicants indicate that new fencing would be erected. This can also be required by imposition of a suitably-worded condition. It is considered that the relationships of the proposed development with Nos.1-4 Green Acre would be acceptable in planning terms. This is considered to be the case whether or not the current intervening trees and shrubbery partially screening the boundary with the neighbours were to be wholly or partially removed or damaged as a result of the proposed development.

Concerns have also been expressed more generally by objectors about the possibility of increased noise, disturbance and pollution arising from the proposed residential development. However it is considered that the type and nature of activity in York Crescent resulting from the proposed development would be conventional and typical of that which occurs in residential roads nationwide. In the circumstances, whilst it is appreciated that the proposals would result in change for existing residents, the resulting activity would neither be undue nor unacceptable in planning terms. As such, objectors' concerns in this respect would be insufficient justification for the refusal of planning permission.

Given the location of the application site it is considered appropriate that a condition be imposed to require submission of a Construction Method Statement to set out the measures to be employed during the construction phase to minimise noise, vibration, dust and other

emissions to, as far as practicable, limit impacts upon the amenity of neighbours. Likewise the parking and traffic generation impacts of the demolition, construction and fitting-out periods of the development. Although planning applications cannot be refused on account of the likely construction phase impacts, it is considered reasonable to require the submission of details of construction management measures given the scale of the development and the clear potential for this to give rise to nuisance and inconvenience to neighbours in this location – if only to alert the developer to the need to have regard to such matters.

In conclusion it is considered that the proposed development would have an acceptable impact upon neighbours.

5. The living environment created -

The proposed houses would provide accommodation meeting the Government minimum internal floorspace standards appropriate for their level of occupancy. The proposed development is also able to provide on-site amenity space for residents in the form of private rear gardens exceeding the requirements of New Local Plan Policy DE3 for all of the proposed new dwellings. It is also considered that the proposed dwellings would have acceptable relationships with all neighbours in terms of light, outlook and privacy.

The internal layout of a development is a functional matter between a developer and his client and is to some extent covered by the Building Regulations. Notwithstanding the various objections raised criticising the living environment created for future occupiers of the proposed development, it is a matter for prospective purchasers/occupiers to decide whether they choose to live in the proposed development. Nevertheless, it is considered that the living environment created would be acceptable in planning terms.

6. Highways considerations -

It is current Government guidance that denying planning permissions on highways grounds is only justified and appropriate where any highways concerns are demonstrated to give rise to '**severe**' harm to the safety and/or convenience of highway users. It is not sufficient to merely identify concern about a highway matter. Furthermore, clear evidence of wider highway harm(s) being caused with severe impact(s) must be identified. As a consequence, refusal on highway grounds must exceed a high threshold. This is a material change in planning circumstances that has emerged in recent years that, in the context of York Crescent, has overturned the Council's historic approach that even relatively modest developments should generate a requirement for improvements to be undertaken to the York Crescent roadway – such as re-surfacing etc. Furthermore, it is also long-standing Government guidance that it is neither appropriate nor reasonable for developers to be required to resolve existing highway problems in the vicinity of their site in order to secure planning permission that they are neither responsible for, nor would materially exacerbate as a result of their proposals.

It is proposed that the vehicular access for the development utilise the existing private roadway of York Crescent for vehicular access to/from the public highway at York Road. York Crescent would, as now, remain an un-made shared surface roadway where pedestrians are not segregated from vehicular traffic. This is an arrangement that encourages slow incoming and outgoing traffic. It is considered that the current proposal would only result in a modest increase in traffic using York Crescent. As a consequence of the need to demonstrate **severe** harm to highway safety and convenience of highway users, it is therefore considered that the developer cannot reasonably be required by the Council/Highway Authority to make improvements to York Crescent as a condition of

granting planning permission.

As has been noted with the Officer comments on the objections summarised earlier in this Report, this is not to say that frontage owners of York Crescent other than the applicants may not have a different view about this and might wish to require the applicants/developers to undertake improvement works to York Crescent. However, this is a private property matter that other owners would have to pursue with the applicants and/or developer directly. The granting of planning permission does not supersede land ownership rights. Accordingly, irrespective of the Council/Highway Authority consideration of the acceptability of the proposals from Planning/Highways perspectives, even if planning permission were to be forthcoming from the Council, it would remain open to other owners of York Crescent to seek improvements to the roadway; and, indeed, to seek to enforce parking restrictions and obligations for the repair and maintenance of the roadway with the developer on a private basis. These are all matters in which the Council cannot become involved.

The Highway Authority (Hampshire County Council) has raised no objections to the proposed development on the grounds of traffic generation and any alleged inadequacy in the capacity of York Crescent to serve the traffic associated with the proposed development; and in respect of the proposed vehicular access from the development into York Crescent. In this respect, the proposed development is small in scale, comprising just 3 new dwellinghouses. Additionally, no concerns are expressed about the safety or capacity of the junctions of York Crescent with York Road. The long-established sightlines and junction arrangements here are considered to be conventional and acceptable. There is good visibility along the proposed driveway within the site and ample space provided for passing manoeuvres to take place, albeit it would be traffic associated with the occupation of just two houses such that incidences of vehicles meeting each other are likely to be rare. The driveway is considered to be of an acceptable width and overall standard to serve the proposed development. Turning spaces would be provided so that vehicles at all of the proposed houses could both enter and leave the site in forward gear. The overall arrangement and position of parking internally within the development is therefore also considered to be acceptable.

The proposed development makes satisfactory provision for on-site parking comprising three parking spaces for each proposed 4-bedroom house. Specific objections are raised on the grounds that (a) the Plot 1 house has a 'Bonus Room' that could be used as a 5th bedroom, thereby requiring more parking provision; and (b) no visitor parking spaces are shown to be provided with the scheme. However the Council's adopted Parking Standards SPD requires provision of 3 on-site spaces for **4-bedroom + dwellings**; and the visitor parking requirement for the proposed development (according to Principle 9 of the SPD) is 3/5ths of a parking space. Even rounded-up to a whole number, provision of a single additional visitor or unallocated parking space could be met with parking on the road frontage of the application site or by temporary parking adjoining the allocated spaces at each of the proposed houses without inconveniencing occupiers of the other dwellings within the scheme. It is considered that the proposals comply acceptably with the Council's adopted car parking requirements and, in any event, the proposed development would meet its own functional car parking needs without materially exacerbating any existing issues.

No cycle parking is shown to be provided with the scheme, although it is considered that this is easily done by provision of sheds with each of the proposed house plots, which can be required by condition. The proposals would thereby meet the Council's adopted parking standards in full and, as such, the proposed development makes appropriate and acceptable provision for parking on-site to support itself.

All of the proposed house plots are shown to be provided with adequate space for the storage of refuse/recycling bins and this can be secured and retained with the imposition of the usual planning condition. Whilst objectors consider the proposed bin collection arrangements for the development to be unacceptable, the proposed arrangements are conventional, would be consistent with the existing collection arrangements applicable to existing properties in York Crescent and Green Acre, and no objections are raised by the Council's Operations Manager (Domestic Bin Collection).

No Transport Contribution has been requested by the Highway Authority, Hampshire County Council, in this case.

It is considered that the proposals are acceptable in highways terms.

7. Impact Upon Wildlife & Biodiversity –

(a) Special Protection Area.

The European Court of Justice judgement in 'People Over Wind, Peter Sweetman v Coillte Teoranta C-323/17' in April 2018 established the legal principle that a full appropriate assessment (AA) must be carried out for all planning applications involving a net gain in residential units in areas affected by the Thames Basin Heaths SPA, and that this process cannot take into account any proposed measures to mitigate any likely impact at the assessment stage. This process, culminating in the Council's Appropriate Assessment of the proposals, is overall described as Habitats Regulation Assessment (HRA).

Undertaking the HRA process is the responsibility of the decision maker (in this case, Rushmoor Borough Council) as the 'Competent Authority' for the purposes of the Habitats Regulations. The following paragraphs comprise the Council's HRA in this case:-

HRA Screening Assessment under Regulation 63(1)(a) of the Habitats Regulations : The Thames Basin Heaths SPA is designated under the E.C Birds Directive for its lowland heathland bird populations. The site supports important breeding bird populations, especially Nightjar *Caprimulgus europaeus* and Woodlark *Lullula arborea*, both of which nest on the ground, often at the woodland/heathland edge; and Dartford Warbler *Sylvia undata*, which often nests in gorse *Ulex* sp. Scattered trees and scrub are used for roosting.

Heathland is prone to nitrogen deposition due to increases in Nitrogen Oxide. Calculations undertaken for the Rushmoor Borough Council Local Plan found that there will be no in-combination impacts on the habitats as a result of development in the Local Plan, including an allowance for 'windfall' housing developments. However within the screening process it will need to be ascertained whether development outside the Local Plan within 200m of the SPA will increase vehicle movements to above 1000 extra trips/day or exceed the Minimum Critical Load by over 1% either alone or in-combination with the Local Plan.

The bird populations and nests are very prone to recreational disturbance, with birds vacating the nests if disturbed by members of the public. This leaves the young unprotected and increases the risk of predation. Dogs not only disturb the adults, but can directly predate the young.

Visitor surveys have shown that the visitor catchment area for the Thames Basin Heath SPA is 5km, with any proposals for residential development within this catchment contributing to recreational pressure on the SPA. The research also evidenced that residential development

within 400m of the SPA would cause impacts alone due to cat predation of adult and young birds.

The retained South East Plan Policy NRM6 and adopted New Rushmoor Local Plan (2014-2032) Policy NE1 (Thames Basin Heaths Special Protection Area) and Thames Basin Heaths Avoidance & Mitigation Strategy (2019)], state that residential development within 400m of the SPA should be refused and development within 5km of the SPA should provide Strategic Alternative Natural Greenspace (SANG) of 8ha/1000 additional population and contributions to Strategic Access Management and Monitoring Measures (SAMM) dependant on the number of bedrooms.

It is considered that there is sufficient information available with the planning application provided by the applicants with which the Council can undertake the HRA process. In this case the proposed development involves the creation of 3 net new residential units within the Aldershot urban area. As such, the proposed development is located within the 5km zone of influence of the SPA but outside the 400-metre exclusion zone. The proposed development is neither connected to, nor necessary to the management of, the Thames Basin Heaths SPA. Furthermore, the proposed development would not result in a net increase in traffic movements in excess of 1000 vehicular movements per day in proximity to the SPA.

All new housing development within 5 km of any part of the Thames Basin Heaths SPA, of which the current proposals would make a contribution, is considered to contribute towards an impact on the integrity and nature conservation interests of the SPA. This is as a result of increased recreation disturbance in combination with other housing development in the vicinity of the Thames Basin Heaths SPA. Current and emerging future Development Plan documents for the area set out the scale and distribution of new housebuilding in the area up to 2032. A significant quantity of new housing development also results from 'windfall' sites, i.e. sites that are not identified and allocated within Development Plans. There are, therefore, clearly other plans or projects for new residential development that would, together with the proposals the subject of the current planning application, have an 'in-combination' effect on the SPA. On this basis it is clear that the proposals would be likely to lead to a significant effect on European site (i.e. the Thames Basin Heaths SPA) integrity.

Appropriate Assessment under Regulation 63(1) of the Habitats Regulations : If there are any potential significant impacts upon the Thames Basin Heaths SPA, the applicant must suggest avoidance and/or mitigation measures to allow an Appropriate Assessment to be made. The Applicant must also provide details that demonstrate any long term management, maintenance and funding of any such solution.

The project the subject of the current planning application being assessed would result in a net increase of dwellings within 5 km of a boundary of part of the Thames Basin Heaths SPA. In line with Natural England guidance and adopted New Rushmoor Local Plan Policy NE1 and Thames Basin Heaths Avoidance & Mitigation Strategy (2019), a permanent significant effect on the SPA due to an increase in recreational disturbance as a result of the proposed new development is likely. As such, in order to be lawfully permitted, the proposed development will need to secure a package of avoidance and mitigation measures.

Rushmoor Borough Council formally adopted the latest version of the Thames Basin Heaths SPA Avoidance & Mitigation Strategy (AMS) in May 2019. The AMS provides a strategic solution to ensure the requirements of the Habitats Regulations are met with regard to the in-combination effects of increased recreational pressure on the Thames Basin Heaths SPA arising from new residential development. This Strategy is a partnership approach to

addressing the issue that has been endorsed by Natural England.

The AMS comprises two elements. Firstly the maintenance of Suitable Alternative Natural Greenspace (SANG) in order to divert additional recreational pressure away from the SPA; and, secondly, the maintenance of a range of Strategic Access Management and Monitoring Measures (SAMMs) to avoid displacing visitors from one part of the SPA to another and to minimize the impact of visitors on the SPA. Natural England raises no objection to proposals for new residential development in the form of Standing Advice provided that the mitigation and avoidance measures are in accordance with the AMS.

In order to meet the requirements of Policy NE1 and the AMS applicants must:-

- (a) secure an allocation of SPA mitigation capacity from either the Council's SANGS schemes, or from another source acceptable to Natural England and to the Council; and
- (b) secure the appropriate SANG and/or SAMM in perpetuity by making the requisite financial contribution(s) by entering into a satisfactory s106 Planning Obligation that requires the payment of the contribution(s) upon the first implementation of the proposed development.

These requirements must be met to the satisfaction of Natural England and Rushmoor Borough Council (the Competent Authority) before the point of decision of the planning application.

In this case the applicants have provided written evidence that they have acquired SANGS capacity from the Hart District Council Bramshot Farm SANGS scheme sufficient for the 3 new dwelling units proposed, costing the applicants £34,581.24 that has already been paid to Hart DC. Furthermore, the applicants are also seeking to secure a financial contribution of £2,421.00 towards SAMM by way of a s106 planning obligation submitted to Rushmoor BC requiring payment of this additional SPA financial contribution upon the implementation of the proposed development.

Conclusions of Appropriate Assessment : On this basis, the Council are satisfied that, subject to the receipt of a satisfactory completed s106 Planning Obligation, the applicants will have satisfactorily mitigated for the impact of their proposed development on the Thames Basin Heaths SPA in perpetuity in compliance with the requirements of New Rushmoor Local Plan Policy NE1 and the AMS. Accordingly, it is considered that planning permission could then be granted for the proposed development on SPA grounds.

(b) Site Specific Protected Species.

As a result of the long-term vacancy and disuse of the application site, the land has become somewhat overgrown with natural vegetation. The steep wooded hillside to the rear of the site is undeveloped, contains a number of mature trees and functions as a local wildlife refuge and corridor. As a consequence there is known clear potential for the application site to contain, or be frequented by, protected wildlife species, most notably in respect of badgers and bats.

Local Plan Policy NE4 (Biodiversity) seeks new development to avoid significant harm to biodiversity and, if not possible, to ensure that adequate mitigation is proposed that clearly demonstrates that there would be no adverse effect on the conservation status of priority species. This policy states, inter alia:-

“Development proposals will be permitted if significant harm to biodiversity ... resulting from

a development can be avoided or, if that is not possible, adequately mitigated such that it can be clearly demonstrated that:

1. *There will be no adverse effect on the conservation of priority species*
5. *There will be no loss or deterioration of a priority habitat type, including irreplaceable habitats; and*
6. *There will be no adverse effect to the integrity of linkages between designated sites and priority habitats."*

Additionally, Paragraph 175 of the National Planning Policy Framework (2018) (NPPF) explains that if significant harm to biodiversity cannot be avoided, mitigated or compensated for then permission should be refused. Government Circular 06/2005 (Biodiversity and Geological Conservation) Paragraph 99 states that:-

"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted."

Taking a precautionary approach, in granting planning permission with or without conditions relating to wildlife protection and mitigation, the Council must be able to ascertain and be satisfied on the basis of the consideration of adequate evidence that any conditions to be imposed would be appropriate and effective; and that badgers, bats and other protected species will not be materially harmed or disturbed as a result of the proposed development.

The planning application is supported by two ecological survey reports : a Protected Species Walkover Survey Report; and a Badger Mitigation Survey Report, both dated September 2020. The Walkover Survey report describes the results of a preliminary daytime walkover survey of the site conducted by a qualified ecologist on 27 July 2020 to assess, as a snapshot, the current potential presence of any protected species, habitat suitability, ecological issues and impacts that would be generated by the proposed development. The report has also considered records of notable and protected species within 2km of the site recorded by the Hampshire Biodiversity Records Centre obtained in 2019; and refers back to previous surveys undertaken at the site. The report notes that the dense vegetation on the application site makes some parts inaccessible and, as such, that they could not be surveyed. In noting the limitations of the survey, it is recommended that follow-up survey work be undertaken.

The report refers to the discovery of an active established main **Badger** sett in woodland beyond the rear of the gardens of Nos.21 and 23 York Crescent in 2012. A 2017 Survey then identified suitable habitat for badger within the application site boundary and "*an outlying badger sett with one partially used entrance and three disused entrances....identified within the boundary treeline.*" A 2019 badger survey found six holes within the low tree-lined bank along the eastern (rear) boundary of the current application site, plus signs of mammal activity in the vicinity, confirming the presence of an outlier sett within the site, albeit thought to be used occasionally at most. The current application site, being in proximity to an active sett and containing an outlier sett, was considered to be a regular destination for foraging badgers and/or route for badgers passing through the site. The 2020 Walkover Survey found most of the previous sett holes and has confirmed that the findings of the earlier badger surveys remain valid. Clear potential was also found for bat roosting and good foraging and

commuting habitat for bats in the trees to the rear of the application site. A number of bat species have been recorded in the locality. Additionally, the application site is considered to provide habitat suitable for breeding birds within the denser areas of vegetation and trees. The continued overgrowth of the site and the presence of some piles of rubble are also considered to offer potential refugia for reptiles. Additionally, the site offers suitable foraging habitat for hedgehogs.

The applicants' 2020 Walkover Survey report concludes that, without mitigation and management measures, there is potential for disturbance to badgers, which would constitute an offense under the Protection of Badgers Act 1992. As such, the report recommends that a detailed mitigation document and method statement be produced to be submitted to and agreed with the Council, to contain the specific details of the mitigation strategy and any management measures to be implemented. It is additionally indicated that some proposals for enhancements or suitable habitat management for badgers may be required.

The main recommendation of the 2020 Badger Survey report in terms of mitigation is that the eastern boundary of the application site be preserved as a wildlife corridor ostensibly seeking to protect both the outlier sett within the application site and the main sett beyond. However, it is difficult to see how this is achieved with the site layout of the proposed development. Indeed, the submitted plans show that the land containing the sett is simply to be incorporated into the residential curtilages of the proposed Plot 2 & 3 houses. If this were to be permitted residents would be likely, wittingly or unwittingly, to regularly disturb and frighten badgers from the land with normal domestic activity, noise, lighting, barbecues, and disturbance. The mitigation proposals effectively amount to an exclusion and displacement of badger activity from the application site; and thereby a reduction in the range and foraging opportunities for badgers in the area. Although the rear garden areas of the Plot 2 & 3 houses are of adequate size from the perspective of residential amenity, they are not particularly deep, with the Plot 3 house being sited just 10 metres from the bank at the rear margin of the site. Given such proximity to the sett, it is also difficult to see how disturbance of badgers can be avoided during the construction period of the development; or, indeed, once the proposed dwellings are occupied. The Council's Ecology & Biodiversity Officer objects to the proposals on this basis and it is considered that the proposed development would provide inadequate protection for badgers and their setts. Indeed, how it would be possible for domestic occupation to co-exist with badgers in such proximity to each other. In the circumstances it is concluded that the Council is unable to evidence that granting planning permission, even subject to conditions requiring further information and mitigation and management proposals, would provide the level of enforceable protection required by the Protection of Badgers Act 1992

Bats are protected under the Wildlife & Countryside Act 1981 and Conservation of Habitats and Species Regulations 2018, which apply to all bat species. The mature trees along the eastern boundary of the site form part of a significant tree belt which is considered likely to be important foraging habitat for any bats present; and the applicants' own ecologist notes that the trees bordering the rear boundary of the application site and significantly overhanging the rear gardens of the proposed Plot 2 & 3 houses, contain numerous features that are potential roosting opportunities for bats. The presence of bats and bat roosts is therefore considered to be highly likely and, moreover, bats would be placed in proximity to proposed residential dwellings. In such situations, it is Natural England's standing advice that survey work must be undertaken to ascertain the extent of bats and bat roosts. However, the 2020 Walkover Survey report argues that there are no issues with their identified roosting potential of the mature trees to the rear of the site and that no actual bat survey work is required (and none has been undertaken) because these trees are to be retained. Further, a

mature ivy-clad apple tree shown to be removed on the submitted plans can be made be subject to pre-felling inspection by a licensed bat ecologist and their advice implemented required by planning condition. However, it is considered that the approach recommended by the applicants' ecologist is inadequate; and misses the point and the requirements of the relevant protection legislation. A survey of the tree cover is necessary to properly determine the habitat status of the site. At present it is considered that due to lack of survey, the Council are unable to ascertain the extent of any impact on bats arising from the proximity of the proposed housing to the significant tree belt on the east boundary of the application site.

The submitted tree report states that there is significant dead wood within the eastern tree-line. The Council's Ecology & Biodiversity Officer notes that the proposed Plot 2 & 3 houses would be built close to the tree line and therefore it is far more likely that dead wood and ivy (both often providing roosting opportunities for bats) would be removed for health & safety and cosmetic reasons : a clear way in which the future residents (if not the developer) could wittingly or unwittingly kill, injure or disturb bats. The proximity of the new housing is also likely to lead to increased light levels within what is currently a dark corridor. Although the applicants' Walkover Survey report advises that lighting (during and post-development) can have significant negative impacts on commuting bats, such that lighting at the eastern end of the application site should be avoided or kept to the minimum necessary, there is no indication how light emissions from the proposed development would be minimised and managed. Indeed, it is considered that any such restrictions and measures would be unenforceable. In addition to this the tree line will now be within the curtilage of the residential properties and thus it is considered that potential bat roosts would be more at risk of general disturbance arising from normal domestic activities as already described in respect of impact on badgers that could not be subject to any adequate and enforceable controls.

Specific recommendations are also made in the applicants' Walkover Survey report concerning measures to mitigate impacts upon breeding birds and other mammals, including hedgehogs, which are considered to be adequate and can be dealt with by imposing conditions. However, despite noting that there is clear potential for reptiles to be present at the application site, the applicants' ecologist does not recommend that reptile surveys are undertaken and concludes that no measures in respect of reptiles considered necessary. This conclusion is not accepted and considered to be a further example of non-compliance with wildlife protection legislation and Government policy and guidance.

There is significant potential for protected species to be present within or immediately adjoining the site that are likely to be adversely impacted by the proposed development. Indeed, the applicants' own survey reports submitted with the application do not offer a contrary view. It is considered that delaying the consideration of means and measures to mitigate and/or avoid the impacts upon wildlife by using planning conditions to require the submission of mitigation and protection measures prior to development commencing would not be an appropriate approach; and is advised against by Circular 06/2005. This matter would require resolution prior to the issuing of any planning permission. Consequently, it is considered that the proposed development currently has the capability to cause unmitigated significant harm to protected wildlife species; and the proposals fail to satisfy adopted Local Plan Policy NE4.

(c) Biodiversity.

In addition to Policy NE4, Local Plan Policy NE2 (Green Infrastructure) requires that development provides green infrastructure features within the development and maximises

opportunities for improvement to the green infrastructure network, including restoration of fragmented parts of the network. This approach is also supported by the NPPF. In this respect, development proposals should seek to secure opportunities to enhance biodiversity and include proportionate measures to contribute, where possible to a net gain in biodiversity, through creation, restoration, enhancement and management of habitats and features, including measures that help to link key habitats.

In respect of the proposed development, the Council's Ecology & Biodiversity Officer recommends that the proposals should include measures to improve the biodiversity of the site and to offset any loss of habitat resulting from the removal of the existing vegetation at the site. In this respect the submitted Walkover Ecological Survey notes that the site contains largely semi improved grassland, dense scrub and ruderal vegetation with scattered sub-mature and mature trees. It is considered that the loss of these habitats, with the exception of the ruderal vegetation, will require mitigation on site. However, although the proposed hedgerow habitat creation and the tree planting indicated by the application is welcomed, it is limited and therefore unlikely to provide enough mitigation to counteract the losses, let alone provide any net gain. In the circumstances the applicant has been advised that they should submit a biodiversity offsetting calculation using the Defra matrix to establish what mitigation will be required to offset the loss in order to comply with the requirements of Local Plan Policies NE2 and NE4.

(d) Conclusions on Ecology & Biodiversity

The applicants' agent has been contacted concerning the objections and advice of the Council's Ecology & Biodiversity Officer and they have responded to suggest that there are misunderstandings about the nature of the proposals; and that they would like to discuss and work with the Council to resolve any issues of concern. Nevertheless, it is considered that the concerns that have been identified are more fundamental than the applicants having to undertake some follow-up surveys of the site. It is considered that there are concerns that may mean that a different form of development more removed from the rear margin of the site may need to be considered instead.

8. Surface Water Drainage -

Adopted Local Plan Policy NE8 (Sustainable Drainage Systems) requires that developments include the implementation of integrated and maintainable Sustainable Urban Drainage Systems (SUDS) in all flood zones for both brownfield and greenfield sites. The site is located on land at lowest risk of fluvial flooding and low risk of surface water flooding. Nonetheless, the site slopes down towards York Crescent and the proposals would involve the introduction of significant hard-surfacing to the site, where the existing site has only a limited amount of hard-surfacing. Despite being specifically identified to the applicants at the pre-application stage, the application has not been submitted supported by a Surface Water Drainage Strategy; and minimal information concerning surface water drainage is provided with the application submissions. The possible use of grey-water recycling is mentioned; and it is indicated that permeable paving would be used for the private parking spaces and turning area within the site. The application forms also indicate that soakways and a mains sewerage connection would be used, although it is not known whether either would be possible. The nearby front garden area of No.23 York Crescent appears to suffer from poor drainage indicating ground conditions may not be suitable for soakaways. Furthermore, it is not known whether it would be legally possible for the applicant to connect the proposed new houses into the mains sewer drains in the street and, in any event, this is not necessarily the appropriate approach given the requirements of Local Plan Policy NE8 are to seek on-site

disposal as far as possible. In the circumstances it is considered that the proposals fail to provide adequate details of surface water drainage contrary to the requirements of adopted Local Plan Policy NE8.

9. Public open space -

The New Local Plan seeks to ensure that adequate public open space (POS) provision is made to cater for future residents in connection with new residential developments. Policy DE6 allows provision to be made on the site, or in appropriate circumstances, a contribution to be made towards upgrading POS facilities nearby.

This is a circumstance where a contribution (in this case the Parks Development Officer identifies a POS project requiring £6,600.00 towards public open space comprising refurbishment/renewal of play facility at Kingsway Playground, Kingsway Aldershot) secured by way of a s106 Planning Obligation would be appropriate. which the applicant is in the process of completing. Subject to the completion of this Obligation the proposal is considered to be acceptable within the terms of Local Plan Policy DE6.

Other Matter -

Objectors have raised concerns that the generous size of the proposed dwellings would lend them to the future possibility of being converted into Houses in Multiple Occupation (HMO). Planning permission would be required in any circumstance for the change of use to an HMO occupied by 7 or more persons such that any attempted change of use to a large HMO would be a clear breach of planning control. However, it is currently 'permitted development' (i.e. an automatic planning permission granted by secondary planning legislation) to change the use of a dwellinghouse (Use Class C3) to a small HMO occupied by up to 6 persons (Use Class C4) and visa versa. Minimal communal facilities would need to be provided and such a change of use could not require the provision of any additional on-site parking despite the average occupancy of a C4 small HMO being approximately 3 adult persons more than the average occupancy of a C3 dwellinghouse. Given the nature of the development and the finite space available on site for parking it is, however, considered that this is a circumstance where it would be reasonable for the Council to impose a planning condition removing permitted development rights for the change of use of the proposed houses to C4 use. In this way it is considered that the Council would also retain control over the possible future change of use of the proposed houses to small HMOs.

Conclusions -

The proposals are considered acceptable in principle and in highways terms; would have no material and harmful impact upon the overall visual character and appearance of the area and trees worthy of retention; would have no material and adverse impact on neighbours; would provide an acceptable living environment; and, subject to financial contributions being secured in respect of Special Protection Area mitigation & avoidance and Public Open Space with a s106 Planning Obligation, the proposals would have no significant impact upon the nature conservation interest and objectives of the Thames Basin Heaths Special Protection Area; and appropriately address the Council's adopted Local Plan Policy DE6 concerning Public Open Space.

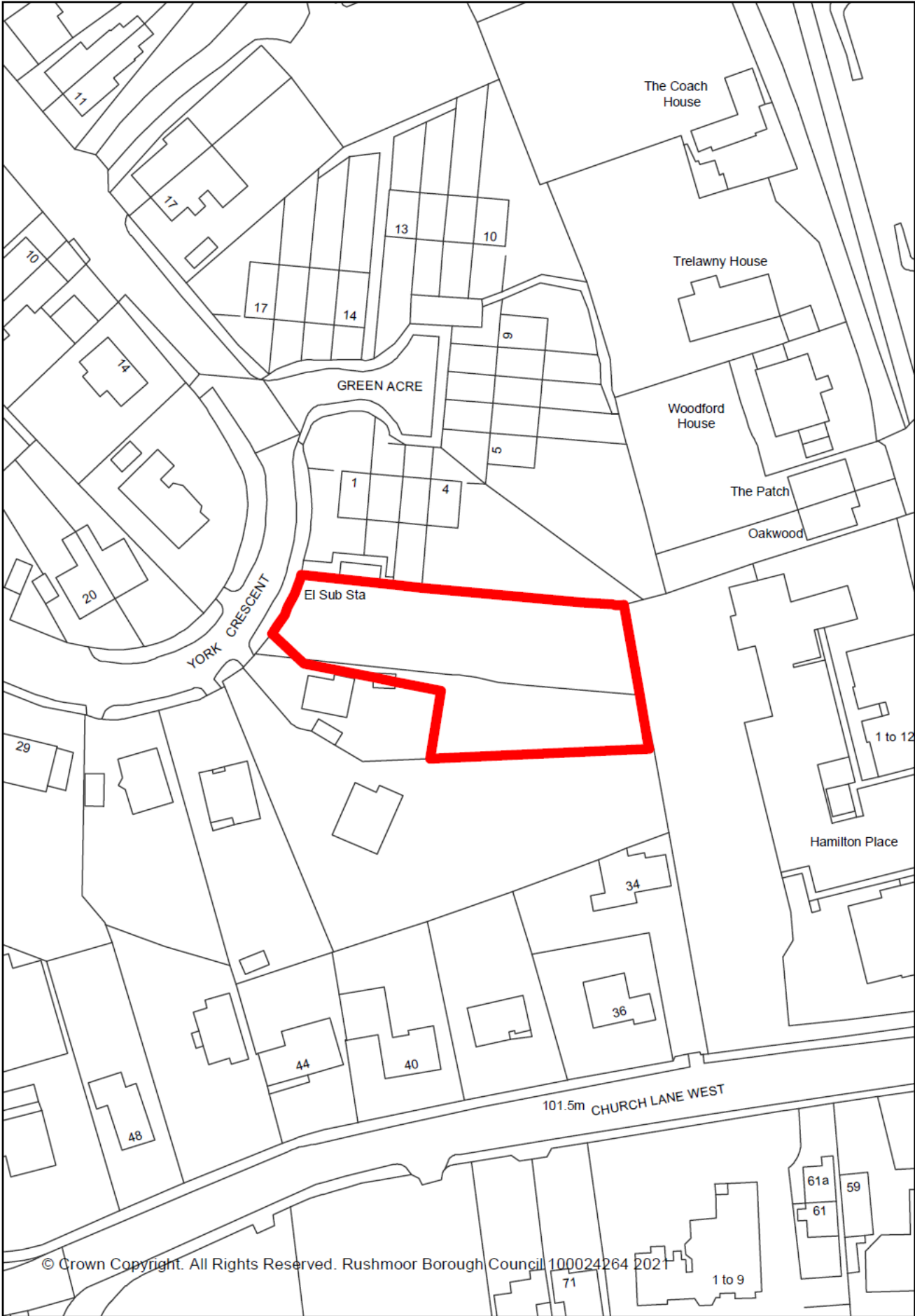
Nevertheless, it is considered that the proposals have failed to satisfactorily address the ecology & biodiversity impacts of the proposed development; and to provide any coherent and considered proposals for the surface water drainage of the site; in both cases where it

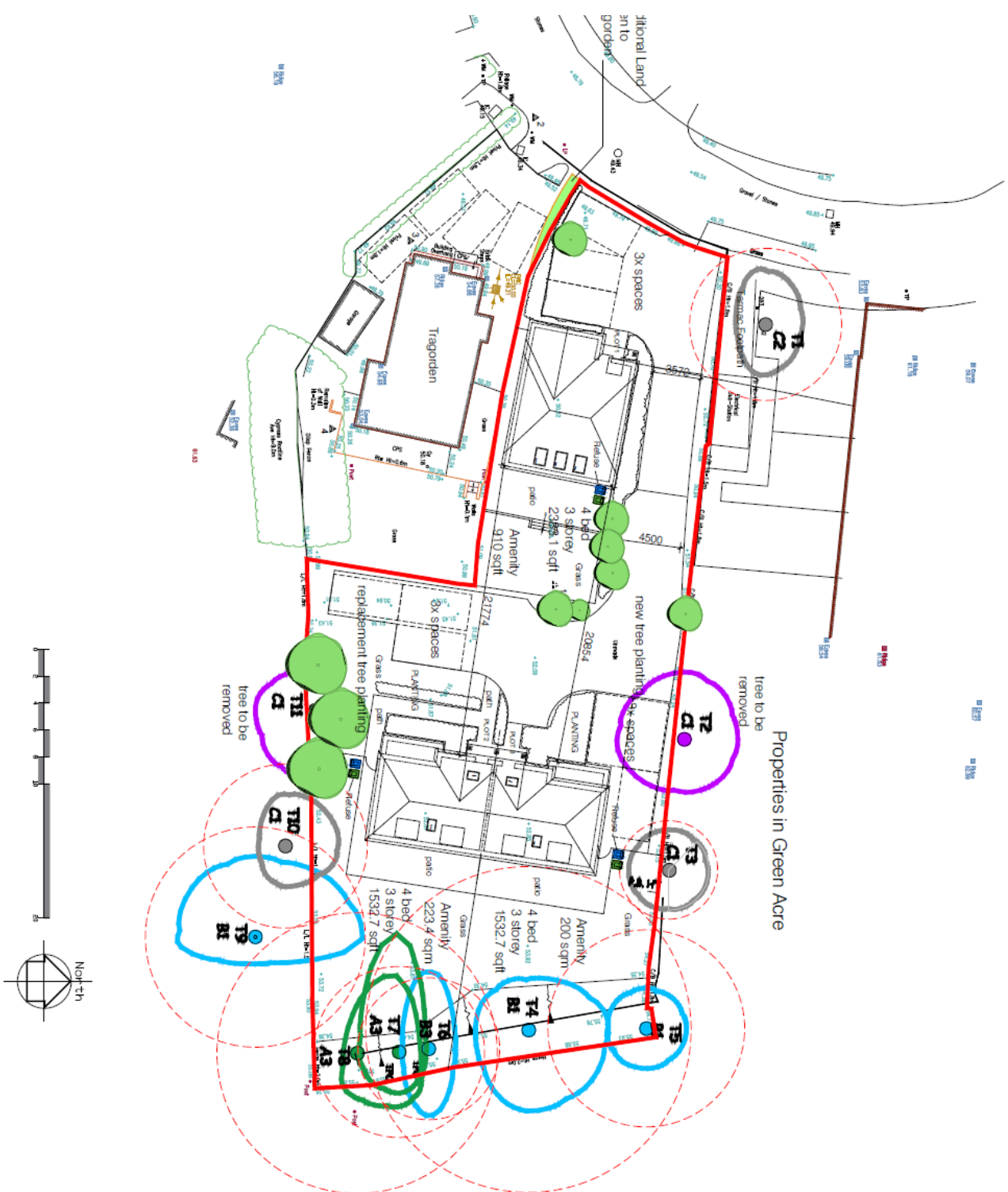
would not be appropriate to deal with the matter by the imposition of conditions. On this basis it is considered that planning permission should be refused for these reasons. This being the case, it would also be necessary to identify reasons for refusal in respect of the failure to address SPA impact and provide an appropriate Public Open Space financial contribution unless that applicants are able to complete a s106 Planning Obligation in these respects before the decision is made.

Full Recommendation

It is recommended that planning permission be **REFUSED** for the following reasons:-

1. The proposal has failed to demonstrate, through adequate surveys of the application land and appropriate proposals for mitigation and management measures, that there would be no adverse impact on protected wildlife species and biodiversity having regard to the requirements of adopted Rushmoor Local Plan (2014-2032) Policies NE2 and NE4.
2. The proposals fail to provide adequate details of surface water drainage measures for the proposed development to take account of the significant additional hard-surfaced area that is proposed contrary to adopted Rushmoor Local Plan (2014-2032) Policy NE8.
3. In the absence of a s106 Planning Obligation, the proposed development fails to make provision to address the likely significant impact of the additional residential units on the objectives and nature conservation interests of the Thames Basin Heaths Special Protection Area. The proposals are thereby contrary to the requirements of retained South East Plan Policy NRM6 and adopted Rushmoor Local Plan (2014-2032) Policies NE1 and NE4.
4. In the absence of a s106 Planning Obligation, the proposal fails to make provision for public open space in accordance with the requirements of Policy DE6 of the adopted Rushmoor Local Plan (2014 to 2032)





Properties in Green Acre

tree to be removed

Category A Tree
Canopy shown N E S W

Category B Tree
Canopy shown N E S W

Category C Tree
Canopy shown N E S W

Tree to be removed

Root Protection Area

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| DRAWN | | Samo Construction Ltd | |
| PROJECT | | The Haven, 19 York Crescent, Adersdorf, GU11 3UN | |
| TITLE | | Proposed Site Layout | |
| SCALE | DATE | SCALE | DATE |
| 1:200 @A2 | 28.08.20 | 1:200 @A2 | 20.7.97 |
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1.4 GREEN ACRE



Proposed Street Scene
(West)



PLOT 1

TRAGORDEN

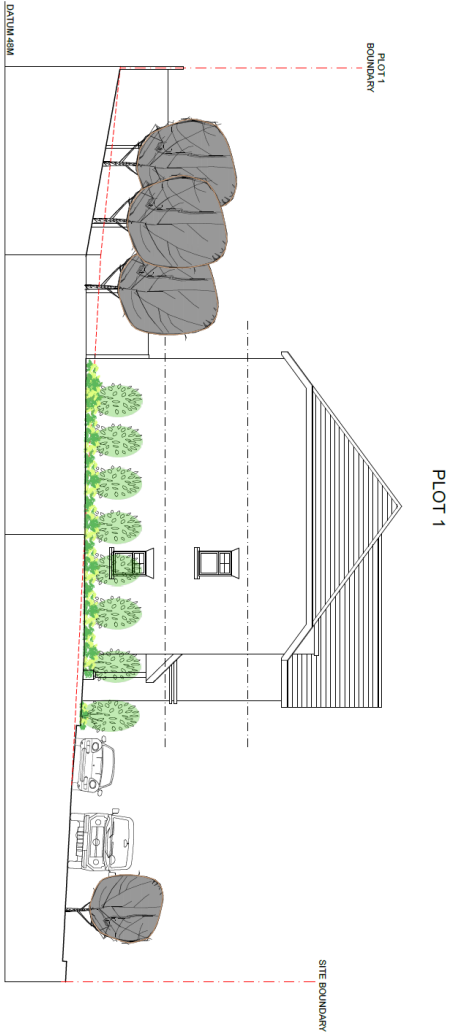
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Front Elevation (West)



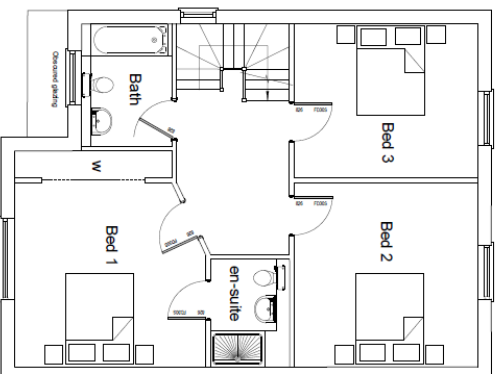
Side Elevation (North)

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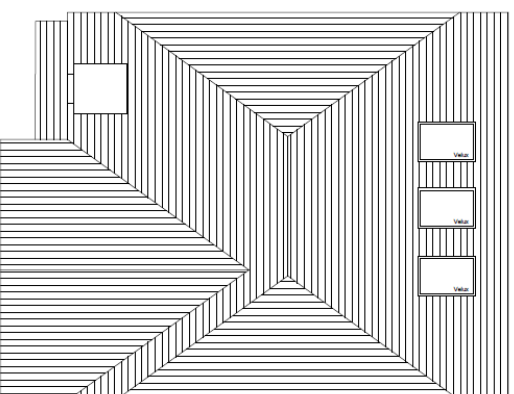


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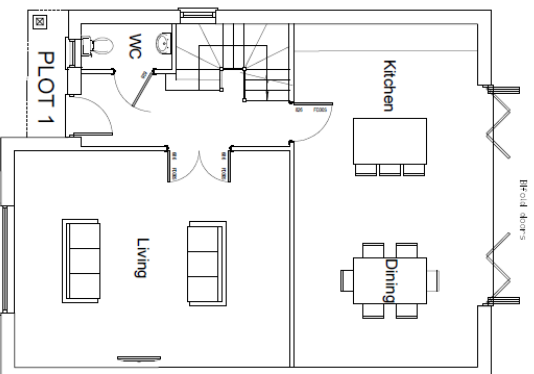
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 PROJECT
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 TITLE
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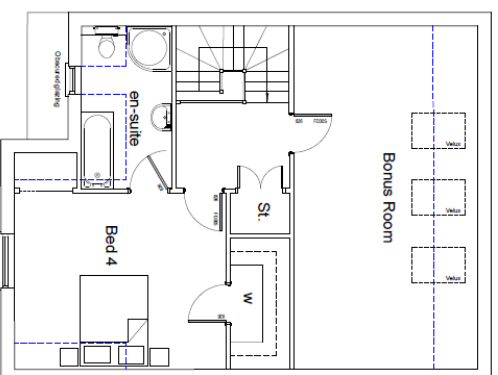
First Floor Plan
73.8 sqm / 794.3 sqft



Roof Plan
221.4 sqm / 2383.1 sqft



Ground Floor Plan
73.8 sqm / 794.3 sqft



Second Floor Plan
73.8 sqm / 794.3 sqft
..... 2.1m head height

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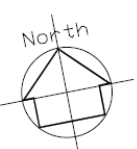
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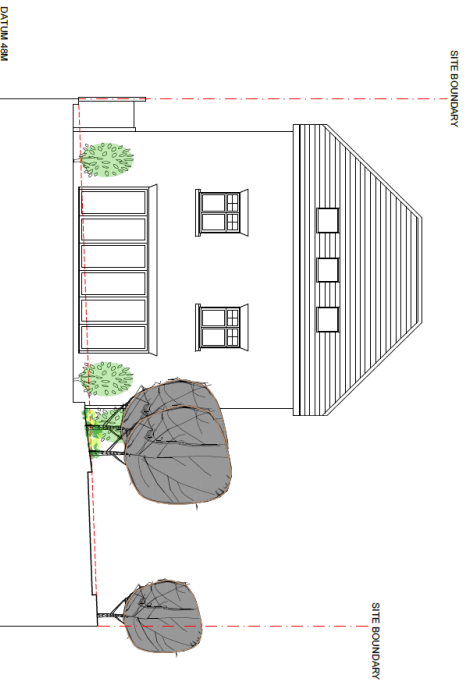
PROJECT
The Haven, 19 York Crescent, Adershot, GU11 5JN

TITLE
Plot 1 Proposed Plans

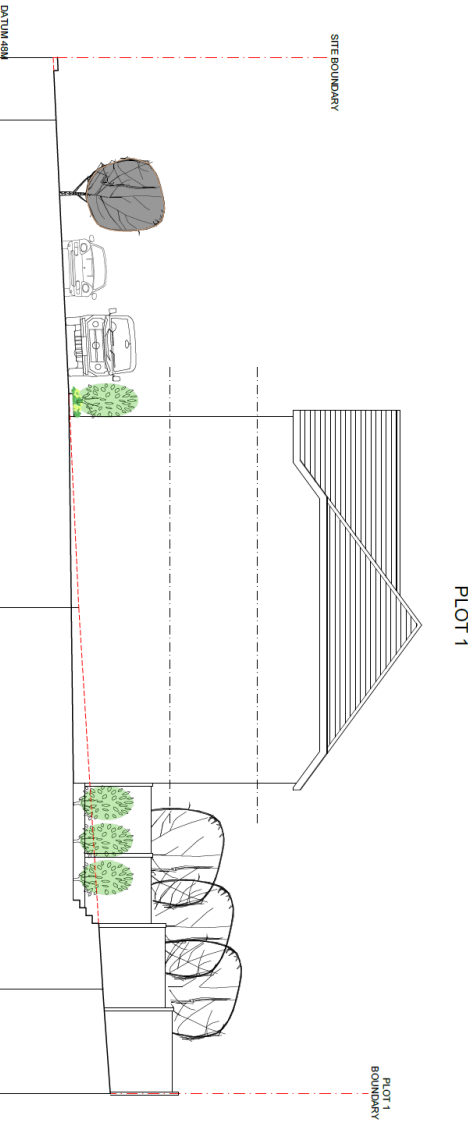
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PLOT 1



Rear Elevation (East)



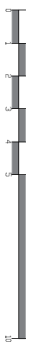
Rear Elevation (East)



Front Elevation (West)



Rear Elevation (East)



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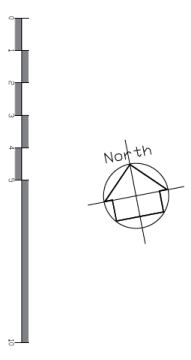
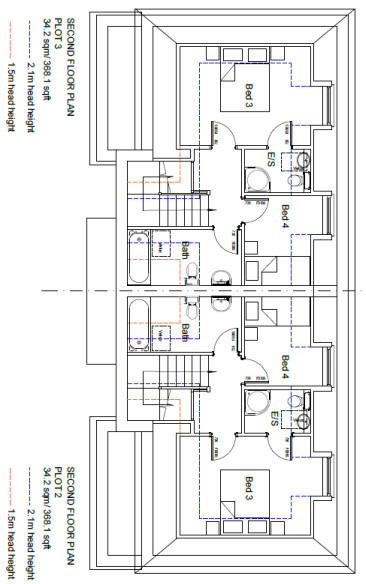
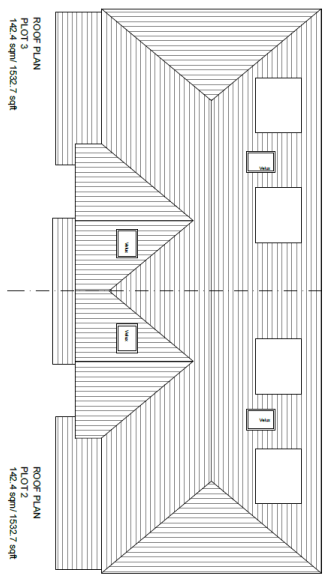
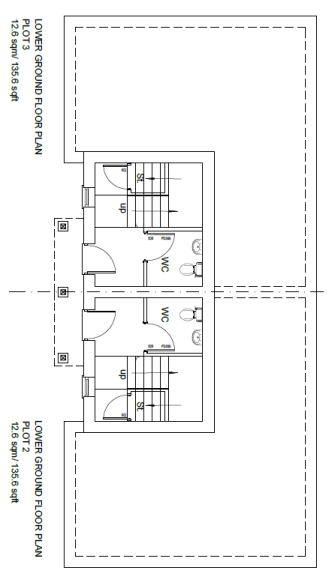
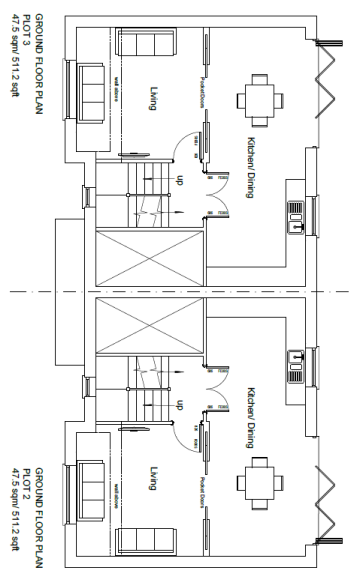
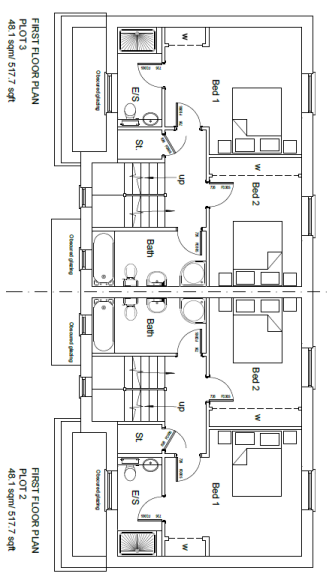
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CLIENT: **Sarnco Construction Ltd**
 PROJECT: **The Haven, 19 York Crescent, Aldershot, GU11 3JN**
 TITLE: **Plots 2 & 3 Proposed Front and Rear Elevations**

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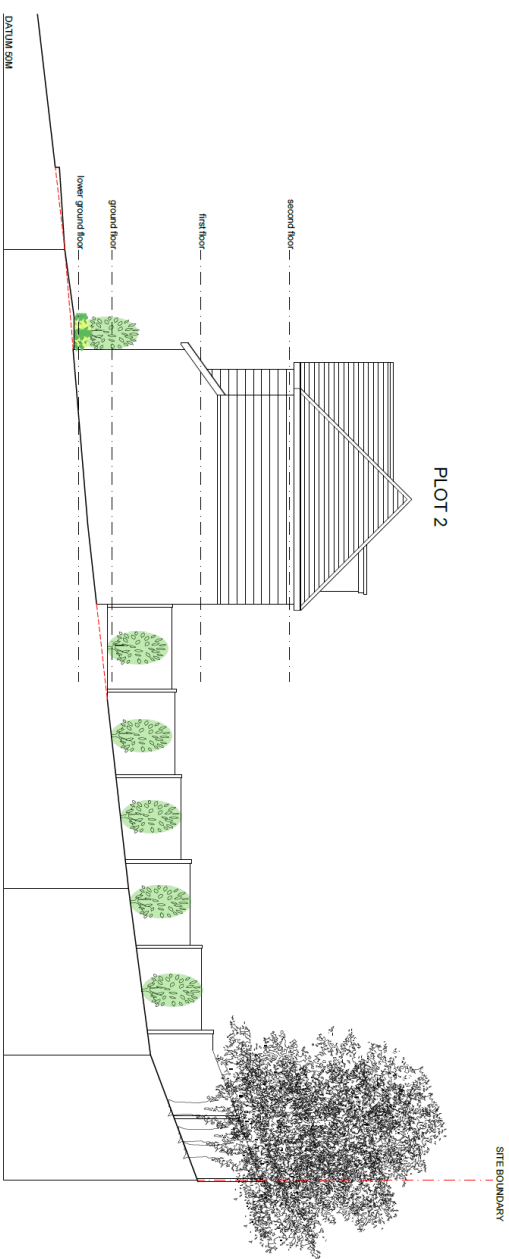
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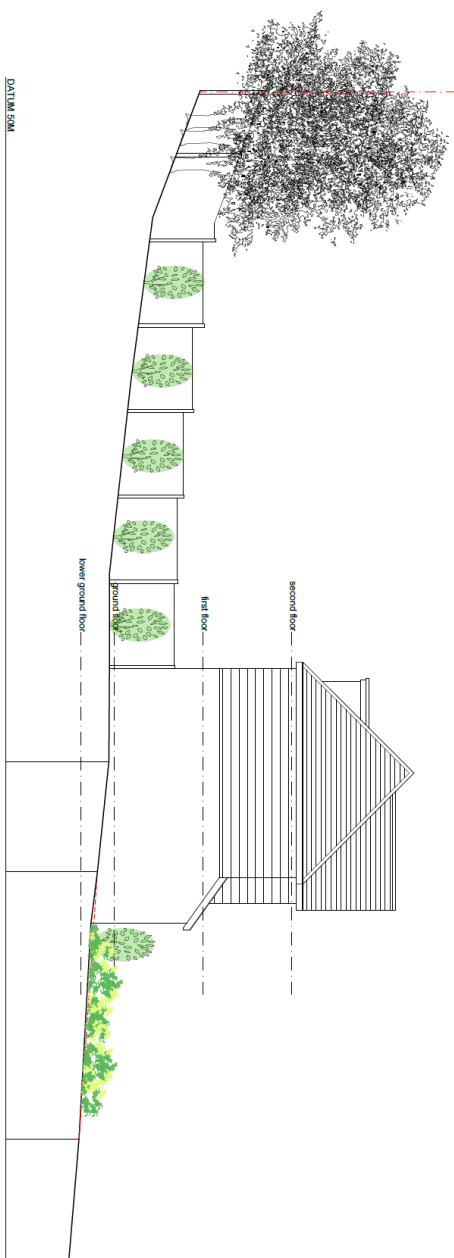
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CLIENT: Samco Construction Ltd
 PROJECT: The Haven, 19 York Crescent, Aldershot, GU11 3JN
 TITLE: Plots 2 & 3 Proposed Plans
 DATE: 28.08.20
 DRAWN: AC
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PLOT 2



Side Elevation (South)



Side Elevation (North)



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| PROJECT | The Haven, 19 York Crescent, Aldershot, GU11 3JN |
| TITLE | Plots 2 & 3 Proposed Side Elevations |
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| DATE | 28.08.20 |
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