



**Deputation for APP/18/01033 - Land East of, Castle Avenue, Havant
for Development Management Committee meeting 10 September 2020**

Regarding the proposed development, Land East of Castle Avenue, Warblington, Havant.

The Warblington and Denvilles Residents Association (WDRA) have no objections in principle to the site being developed. We would, however, like the following comments on the construction to be taken into consideration and the current application **rejected** until the correct standards are met.

Technical standards

The Nationally Described Technical Standards are Governmental minimum area standards for new homes, designed to safeguard prospective owners and tenants. The purpose is to ensure that housing is fit for purpose in terms of daily life and physical and mental wellbeing. Therefore, providing new housing stock below these standards is contrary to common sense and sustainability. There can be no community benefit in allowing the construction of homes which are not fit for purpose and this is highlighted in these current times where people will rightly expect to be able to work flexibly.

It is our civil duty to ensure that new housing meets sensible minimum standards. It is particularly important for Housing Authority building stock where, for reasons beyond the control of future tenants, prospective occupants have no say or ability to refuse substandard homes. Some of the proposed accommodation is in excess of 20% below minimum housing standards and I would urge you, the planning authority (whose role it is to safeguard the borough in development terms), to require that all proposed accommodation meets these minimum standards. Reasons to provide lower standards are to improve profit margins or, of more concern, to disguise a non-viable development site as being viable, building in problems for future generations.

The current plans include a substantial majority of dwellings which fall short of the Government's Technical Housing Standards, leading to below minimum standards for living space, which we consider cannot be good for future residents' wellbeing. These are new dwellings and HBC should require the developer to provide designs which comply with important national standards for the minimum provision of dwellings.

The areas of proposed units in this application, that do not meet Nationally Described standards which have been adopted by Local Authorities across the nation, are set out in the table below:



| House Type | Technical Housing Standard minimum size | Persimmon Homes Proposal | Difference (m ²) |
|---|---|--------------------------|------------------------------|
| Alnwick 2B4P (Private and HA) | 79 | 59 | -20 |
| Clayton Corner 3B5P (Private) | 93 | 92 | -1 |
| Hanbury 3B5P (Private and HA) | 93 | 70 | -23 |
| Moseley 2B4P* (Private) | 79 | 67 | -12 |
| Souter 3B5P (Private) | 99 | 87 | -12 |
| Stafford 3B5P (Private) | 93 | 86 | -7 |
| <p>* The Moseley is designated as a 2B4P three-storey home, not conforming to any minimum standards, principally because the staircase consumes a disproportionately large proportion of the floor area, negatively affecting the usable space. Additionally, the London Housing Guide is frequently referred to in terms of housing design and this document states "Dwellings with three or more bedrooms should have two living spaces, for example a living room and a [separate] kitchen-dining room. Studies will not be considered as second living spaces."</p> | | | |

Parking Standards

Some private garages measure 2.55m x 4.90m. It is widely accepted by Local Authority's across the country that single garages should measure at least 3.0m x 6.0m and HBC have adopted those dimensions (Havant Borough Council Parking Supplementary Planning Document (revised 2019) para 4.09) and states "a reduced garage size is unlikely to count as a vehicle parking space" (para. 4.10). Therefore the proposal's overall proposed parking strategy falls short of the Council's DM13 policy minimum requirement on cycles and parking.

Sustainable construction

The site is a greenfield site, capable of supporting a finite level of development in terms of density and the developer should bring forward a layout which is deliverable; on a greenfield site. There is no mitigation for deviating from sustainable development, whether in terms of construction, energy, water, drainage or human wellbeing.

Bus Transport

Bus stops are available on Emsworth Road, the nearest is approximately 450m (Bus 700 going East to Emsworth/Chichester) from the site (Report by the Head of Planning on this development). It is accessible on foot via Castle Avenue or Warblington Avenue and Emsworth Road. The furthest is 155 metres further (Bus 700 going West) which at over 600 metres and is contrary to HBC policy for sustainable development. Ideally, walking distances to bus stops should be no more than 400 metres (Planning.gov.uk Planning Policy Planning Statements and Supplementary Planning Guidance).



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