

Dear Mr Lee,

Please find below my responses to the Matters, Issues and Questions (MIQs) on behalf and as a resident.

## **Issue 1**

### **The overall spatial strategy**

Q13 In general I support the broad location of development as set out in SS1. I support the approach to density in SS1 that 'density of development should be appropriate of its proposed use and also relate well to the surrounding issues and character of the area.' I support Policy SS2 which provides the indicative number of dwellings on sites. I do not agree with representations from developers that the Council is 'underplaying development potential of sites'. In fact, in respect of A9 the indicative number of dwellings has already increased from 85 at Regulation 18 to 150 at Regulation 19 which is too dense given the constraints and character of the surrounding area. It is inappropriate to compare densities on other developments, each site is very different in terms of its location and impact on the amenities of the existing community.

### **Matter 3 – Housing provision**

#### **DM2 Density and Policy**

Q61 I agree the density of 100 dwellings ph on flatted development in DM2 is not consistent with criterion a) in Policy SS1 which 'seeks to provide the needs of local communities and balance the impact of growth' etc.....

Q62 I agree the Policy is not clear in relation to where lower density might be acceptable.

Q63 The policy is not sufficiently flexible to take account of individual sites.

### **Matter 5 – Site allocations**

#### **Site selection methodology**

Q86 In respect to site A9 it is impossible to assess whether the approach to the assessment and selection of sites, is justified. At Regulation 18 stage this site was identified as an Area of Change. At this stage two representations were received, one from SGN and the other from the EA. The EA asked for the inclusion of surface water drainage on the site to divert contaminants from the water course. SGN supported the site for mixed used residential led development and the indicative capacity of 85 units. Officers' response was 'the development principles would remain largely unchanged' and that 'greater certainty will be achieved which will allow this site to become an allocation ....'. It is impossible for a resident to understand how at Regulation 19 the site becomes an allocation with an indicative capacity of 150 residential units.

#### **General matters**

Q87 In respect of site A9 the amount of development proposed is not justified and does not consider the constraints on the site and infrastructure requirement to make the site safe. The cost and extent of the remediation has not been assessed, yet it is already being used by the developers to justify the need for the higher densities. A recent viability assessment supporting a planning application on the site shows a land value of £2.7m. This high acquisition cost and decontamination costs are being used to justify the lack of provision of community benefits and increased density at 209 flats. This suggests that the site is not

viable and therefore when assessed against the policies in the emerging Local Plan not deliverable. There is no assessment in Policy A9 of the impact on the already inadequate infrastructure. The site is shown as 1.14 hectares, but this is not the total developable area. The site is constrained by the need to provide surface drainage to avoid contamination entering the water course and the need to accommodate equipment on site to support gas related matters. Indicative capacity should and currently does not take account of these constraints.

Q88 – Policy A9 lacks any detail about form, scale, access, and the quality of the development. The development requirements are too vague particularly in relation to the contamination issues, groundwater, access, form or scale and heritage assets.

Q89 – There is a lack of evidence to support the proposed allocation of A9 particularly in relation to the character of the area, heritage assets, local infrastructure including transport, the impact on the efficient operation of the transport network and/or highway safety, contamination, air and water quality, noise pollution, odours, land stability, groundwater and flood risk. Finally, a recent planning application on this site is arguing that even before a full contamination survey has been carried out that the site is not viable and can not therefore meet emerging Local Plan policies particularly the provision of affordable housing, M4 requirements and surface water drainage.

Q90 The site-specific policy in respect of A9 does not contain any effective safeguards or mitigation measures. For example, there is a distinct lack of evidence regarding the decontamination requirement. There is no information on the mitigation required other than the requirement to carry out a detailed investigation of the contamination to assess the remediation required and to deliver a surface water drainage scheme.

Q91 Policy A9 in respect of the infrastructure requirements is too vague and inadequate eg consideration of an 'improved footway'. There is no timeline suggesting when this and any other infrastructure requirements should be provided.

The critical infrastructure required are decontamination, provision of surface water drainage, more onsite parking, improved access, improved pedestrian routes, and improvements to Lyndhurst Road to accommodate the increased traffic generated by the site.

### **A9 Lyndhurst road**

Q116 Full consideration has not been given to the suitability and delivery of the site particularly in relation to contamination and heritage impacts. The proposed allocation does not take account of the character of the area which is low rise cottages and terraces on the very edge of the town centre boundary close to two conservation areas. A recent heritage statement on the site identifies the harm the development would cause to the Warwick Gardens Conservation Area if development is above 5 storeys.

Proposed Policy DM22 identifies the site has a medium priority for further investigation in its Land Contamination Strategy. A recent desk top survey on the site recommends an intrusive investigation of the site to assess the risk to human health and controlled waters to inform a Ground Contamination Interpretative Report (GCIR). Given the sites proximity to the hospital and homes it is crucial that there is an understanding of the contamination issues on the site.

Q117 – Full consideration has not been given to the impact of development on the local highway and parking. The site is proximate to a major hospital, in a CPZ which is oversubscribed and has the largest waiting list in the Borough. The allocation does not take account of the nature of the current road network. Park Road is one way and very narrow,

Lyndhurst Road is heavily constrained and surrounded by residential properties. It is a busy road that serves an A&E hospital and a school.

Q118 – I support proposed modification M18. This location is extremely sensitive, it is close to two conservation areas. It is also surrounded by an area where an application for a conservation area is outstanding.

#### **Matter 9**

##### **DM5 Quality of the built environment**

Q164 I am extremely disappointed that the Council have given in to developers in M27 by proposing to add 'to ensure that efficient use is made of available land the Council will positively consider applications for tall buildings on sites that can appropriately accommodate buildings of height.' How would 'appropriate' in relation to the site be assessed? Furthermore, I do not support proposed modification M28 to viii) in relation to noise which seeks to include 'giving rise to significant adverse impacts' and 'vehicular movements resulting in severe cumulative impacts in the road network.' These changes benefit developers and not residents. It is difficult to understand how significant and severe will be assessed?

#### **Matter 10**

##### **DM20 Flood risk and sustainable drainage**

Q180 I do not support the proposed modification M39 to amend DM20 on behalf of St Williams to include 'where practicable and viable'. The reason for requiring drainage is an attempt to keep contamination out of the water course. I fear the developer will argue it is not viable to provide the drainage in the same way a recent planning application from St William on this site does not propose any affordable housing on viability grounds. The drainage is essential and should be provided if it cannot be provided the site is not deliverable.

##### **DM22 pollution**

Q186 I do not support the proposed modification M42 I do not think the deletion of noise is required and I do not think the proposed change at e) is required.

Kind regards,

Judy Holmes