



Planning Statement Addendum & Amendments Summary

**Land at Campsfield, Southwater
Miller Homes Ltd**

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1.0 Introduction

1.1 This report principally provides an overview and summary of the amendments made to the proposals in response to changes in flood risk data and the consultee comments received. This addendum supplements and should be read alongside the planning statement submitted with the original application.

1.2 Accompanying this report are supplementary and updated plans and reports as follows:

Plans

- Updated Site Location Plan - 02.40(01)00 RevA (supersedes previous Site Location Plan)
- Updated Parameter Plan - 02.40(01)**10** (supersedes 02.40(01)**01**)
- Updated Illustrative Masterplan – 02.40(01)**20** (supersedes 02.40(01)**02**)

Reports

- Updated Design and Access Statement (supersedes previous version of statement)
- Addendum Transport Assessment
- Updated Travel Plan (supersedes previous Travel Plan)
- Updated LVA (supersedes previous LVA)
- Updated Landscape Design Statement (supersedes previous Landscape Design Statement)
- Updated Ecological Impact Assessment (supersedes previous EIA)
- BNG Assessment and HMMP (supersedes previous version of same report)
- 2x Updated BNG Calculators (supersedes previous BNG Calculators)
- Updated FRA & Design Strategy (supersedes previous FRA & Design Strategy)
- Updated Tree Protection Plan (supersedes Previous Tree Protection Plan)
- Updated Arboricultural impact appraisal and Method Statement (supersedes previous Arboricultural Impact Appraisal and Method Statement)
- Water Neutrality Report (new document)

1.3 The first section will outline the changes to the proposals before providing a summary of how the proposals are appropriate and respond positively to the consultee comments received. The addendum report will conclude by confirming that the proposed development, as amended, represents sustainable development that will provide positive economic, social and environmental outcomes.



2.0 The Amended Proposals

2.1 The original proposals submitted in early January 2025 were laid out to avoid areas of heightened surface water flood risk as indicated at that time. On the 28th of January, after our original application submission, the Environment Agency (EA) released updated flood risk mapping based on more up to date data and modelling. This altered the extent and location of surface water flood risk on site as indicated on figure 1 below.



Figure 1 - Surface water flood risk maps. Left; the EA surface water flood mapping at time of submission. Right; EA surface water flood risk following 28/01/2025 update.

2.2 In broad terms the updated mapping significantly reduced the extent of surface water flood risk to the northern part of the site and introduced surface water flood risk at the south-eastern edge of the site. Further discussion of the flood risk is contained in the updated FRA and Drainage Strategy report.

2.3 It had previously been agreed with HDC Officers via pre-application discussions, that provided all built form remained outside of areas at any risk of surface water flooding and roads remained outside of areas of medium and high surface water flooding the sequential test would not be applied to the site. This approach was reaffirmed by officers (Stephanie Bryant) on a call on the 21st March 2025.

2.4 Consequently, in light of the revised mapping the proposals have been redesigned in order to avoid areas at heightened risk of surface water flooding as indicated by the latest EA flood map data. As per officer's advice, and as indicated by Figure 2, all built form is outside of areas of any risk of flooding and all roads (except where the access crosses a ditch) are outside of areas of medium or high flood risk.

2.5 The FRA confirms that the surface water risk associated with the access relates to an existing ditch which can be culverted to provide safe access. Officers (Stephanie Bryant) have confirmed, given this flood risk relates to a ditch which can be culverted, that this would not trigger the application of the sequential test.





Figure 2 - Amended Illustrative Layout overlaid with latest EA surface water flood risk (Paul Basham Associates)

2.6 At the same time, the opportunity has been taken to make improvements to the parameter plans and illustrative layout to respond positively to the consultee comments received.

2.7 Key changes to the layout include:

- Relocation of the road linking the western and eastern parcels to the south, avoiding encroachment within the RPAs of the important central trees to be retained.
- Creation of a larger buffer of open space to the southern edge of the western parcel to provide a softer edge, responding to the landscape officer's request for a larger buffer to the southern boundary.
- Provides for a more cohesive and useable area of public open space (incorporating a LAP).
- Removal of swales no longer required which provides additional usable open space (basin on western boundary remains largely as originally proposed).
- Increased buffer to north-eastern site edge to avoid area of slightly increased surface risk and to provide additional amenity space and buffer to this boundary.
- Retention of and increased pedestrian linkages between and from parcels and the site.
- Inclusion of acoustic fence onto the parameter plans to provide clarity.

2.8 The number of homes proposed remains 82, including 35% affordable housing. The mix of affordable units proposed also remains as per the original submission (see paragraph 8.3 of the Planning Statement)





Figure 3 - Top; original submission parameter plan. Bottom; amended submission parameter plan.

- 2.9 There has also been a minor change to the redline boundary at the site access to incorporate the existing lefthand footway that runs around the turning head and new access.
- 2.10 The amendments therefore are considered to not only respond to the latest EA Flood Risk data but also take up opportunities to further improve the proposals to respond to comments and create a more cohesive and higher quality living environment for future residents.

3.0 Responding to Consultees

3.1 This section sets out our summary response to consultee comments that have been provided to date, including where changes to the layout positively address comments received. The submitted and updated technical reports and plans provide the full technical response to comments received.

Landscape and Trees

3.2 The LVA has been updated to respond to the comments of the landscape officer providing updates to the characteristics of the landscape character area in which the site sits. The majority of the assessment outcomes remain unchanged in the updated LVA, including when the amendments to the proposals are taken into account. A minor adjustment to the residual effect to the landscape character of the site has been made after further consideration.

3.3 In respect of the requested additional landscape mitigation, it is firstly worth noting that the application is in outline with all matters, except access, reserved. This means matters of landscaping and layout are for future consideration. A number of the mitigation measures suggested by the Landscape Officer relate to matters of detail.

3.4 The amended illustrative masterplan and associated parameter plans address positively the majority of concerns raised as set out below:

- The pedestrian connections to the PRoW on the southern boundary have been reviewed to ensure they utilise existing breaks in the southern hedgerow boundary to avoid any unnecessary loss of vegetation. A new connection is not proposed in the south-eastern corner due to the need for an acoustic fence and to avoid encouraging pedestrians towards the dual carriageway.
- Green corridors are retained to this southern boundary, although it is noted there is no legislative requirement for a 15m buffer to this boundary, the amended masterplan retains a minimum 15m buffer from the western development parcel to the southern boundary vegetation, and a minimum 7m buffer from the eastern development parcel to the southern boundary vegetation.
- In all instances the Root Protection Areas of existing trees are respected, and the landscape proposals seek to provide additional tree and understorey planting wherever possible to help provide visual screening and mitigation for losses of plantation trees. An update Tree Protection Plan and associated AIA and MS are submitted demonstrating the relationship of the indicative proposals with the surrounding RPAs. The relationship of built form with existing trees can be further refined at the detailed design stage when matters of layout are considered in detail.
- The indicative masterplan demonstrates that ample space exists for planting along the main street with open space located along the majority of one side providing opportunities for substantive planting in these areas. The existing retained boundary and central mature tree planting also already provides a mature landscape to the development.

3.5 Further details of the landscape design are set out in the updated Landscape Design Statement.

3.6 The landscape comments suggest allotments should be secured on site of a minimum 400m². This is not appropriate or an efficient use of land for a scheme of this scale.



Furthermore, it is not an efficient way to provide allotments which would be too small to be effective or efficiently managed.

3.7 Similarly, the provision of formal 'Park and Gardens' is not considered an appropriate type of open space provision on this site. The site encompasses a range of types of open space, including amenity open space and semi-natural space, along with a LAP, which aligns with the scale of the development as well as its character, located in an edge of settlement location where existing tree planting already provides a strong character. The provision of open space that builds on this character in the form of a series of semi-natural spaces is more appropriate to the character of the area whilst still providing sufficient green spaces for residents to enjoy. The quantum of usable public open space/green infrastructure has also increased as a result of the updates to the masterplan.

3.8 Further detail is provided in the Landscape Design Strategy document.

3.9 The inappropriateness of Allotments and 'Parks and Garden' forms of open space has been agreed with the planning officer (meeting of 21st March 2025).

3.10 Overall, the proposals are considered appropriate in landscape terms and will provide a strong landscape setting to the development whilst providing high quality environment for future and existing residents to enjoy.

Ecology

3.11 Firstly, we are pleased that the Ecology Consultee (Place Services response 11/03/2025) is largely in agreement with our ecology surveys and raises no objection in this regard (subject to conditions and water neutrality).

3.12 In respect of the separate comments on BNG, updated calculators and associated BNG and HMMP reports have been submitted which address the main comments raised. In summary, the updates to each query are as follows:

As the line of trees has been entered separately within the metric, please can this be mapped separately so its location within the site is clear. –

3.13 This has been remapped separately as requested and the BNG metric updated to reflect this.

Discrepancy between Table 3 of the BNG HMMP Report (Ecosupport, 2024) and the metric.

3.14 This has been corrected in the updated BNG HMMP report.

Off-site habitats at baseline include individual trees.

3.15 Whilst there remains some ambiguity in the guidance as to how and when individual trees should instead be counted as woodland, this has nonetheless been changed to woodland, and appropriately updated for the purposes of the BNG calculator.

This also applies to the on-site line of trees that appears to be incorporated into the onsite woodland planting. –



3.16 As above, this has also been updated for the existing onsite trees with a subsequent update to the BNG calculation.

There are two hedgerow types entered within the metric for post-development habitat creation, however these have been mapped under a single key in the post-development UKHab map -

3.17 Corrected in the updated BNG calculators and HMMP reports.

Additionality

3.18 The explanation has been re-written with a screenshot of the guidance included and visual demonstration of the areas excluded from the 'enhancements only' metric and those considered mitigation/compensation for the ancient woodland and Dormice.

3.19 Should further clarification of the approach be necessary we would welcome a meeting with the ecology officer to discuss and agree the approach.

Details relating to watering method and frequency are missing -

3.20 Added to HMMP report

Herbicides should only be used when removing invasive non-native species –

3.21 Amended in HMMP to make clearer.

It is discouraged to plant woodland trees in a linear sequence to avoid the appearance of a plantation woodland.

3.22 Has been amended in HMMP to make clear linear tree planting should be avoided.

3.23 Overall, with the above amendments made to the scheme the proposals (including the enhancements to the site to the south of the site) result in a 33.18% increase in Habitat units and a 11.09% increase in hedgerow units, both in excess of the mandatory 10% net gain in biodiversity.

Flood Risk & Drainage

3.24 As discussed in section 2 of this report, the proposals have been amended to avoid the areas of highest surface water flood risk. The associated Flood Risk Assessment and Drainage Strategy has also been updated to reflect the changed flood risk data.

3.25 The avoidance of built form within areas at any risk of flooding and roads being located away from areas at highest risk, coupled with the proposed sustainable drainage system, means the proposed dwellings will be safe from flooding for their lifetime whilst also avoiding increased flood risk off site.

3.26 The avoidance of built form, including roads, within areas of medium and high surface water flood risk means the sequential test should not be applied, as agreed in discussions at pre-application stage with officers at HDC. The FRA confirms that the small section of heightened surface water risk at the site access is associated with a ditch that can be culverted such that the road level would be above the level at risk of surface water flooding.



- 3.27 The application is in outline which means the final detail of the drainage strategy will be refined and then submitted as part of any future Reserved Matters application, with the current FRA and associated outline drainage strategy demonstrating that a suitable approach to draining the site is achievable
- 3.28 Consequently, queries 3 and 4 from the LLFA relate to matters of detail more appropriately addressed at the RM and conditions stages.
- 3.29 Nonetheless, The FRA also confirms in relation to comment 4 from the LLFA that the indicative basin designs provide 3.5m freeboard between the peak water level in the proposed basin (during the 1% AEP event +45% Climate change) and the proposed finished floor levels of the dwellings, far in excess of the 0.3m freeboard required in the CIRIA SuDS Manual.
- 3.30 In respect of query 3, a request for sections at outline stage is very unusual, bearing in mind the detailed basin design will likely alter slightly at RM stage. Nonetheless, in addressing query 4, we trust this provides reassurance that the basins are designed such as to be appropriately sized to successfully manage water on site.
- 3.31 We trust therefore that the updated FRA, coupled with the revisions to the plans, provide the level of detail required to confirm the proposal is acceptable in flood risk and drainage terms.

Transport

- 3.32 The application is in outline and matters of layout and detail are not currently for consideration. The detailed comments on matters such as bin stores, refuse and fire collection and parking for example will be considered at later reserved matters stage.
- 3.33 WSCC largely agreed with the approach taken to traffic modelling but requested some further clarification, particularly in regard to the Vision Led approach to the TA and associated Travel Plan measures.
- 3.34 These have been taken forward in an amended Travel Plan and TA addendum that addresses these concerns and confirms the measures that will be put in place to encourage sustainable travel modes will be used by residents of the site.

Water Neutrality

- 3.35 A Water Neutrality Report is submitted demonstrating the likely water use arising from the development, including the proposed method by which the site will achieve water neutrality using onsite water abstraction via boreholes. The report summarises that with water saving measures the development will have a water demand of 16,000 l/day. It also confirms the 2no onsite boreholes are capable of abstracting sufficient water per day to offset this demand.
- 3.36 The site can therefore achieve water neutrality and hence will avoid increased abstraction at the sensitive Arun Valley SPA. This means significant adverse impacts on the SPA are avoided, the HRA can be passed and permission can be granted.



4.0 Closure

- 4.1 This report has summarised the amendments made and also set out how technical consultee comments have been addressed positively resulting in betterments to the scheme overall.
- 4.2 We trust that this document and the accompanying information to support the proposed changes addresses any outstanding comments, is acceptable and enables the application to progress towards a positive recommendation. Any further queries please do not hesitate to contact us.

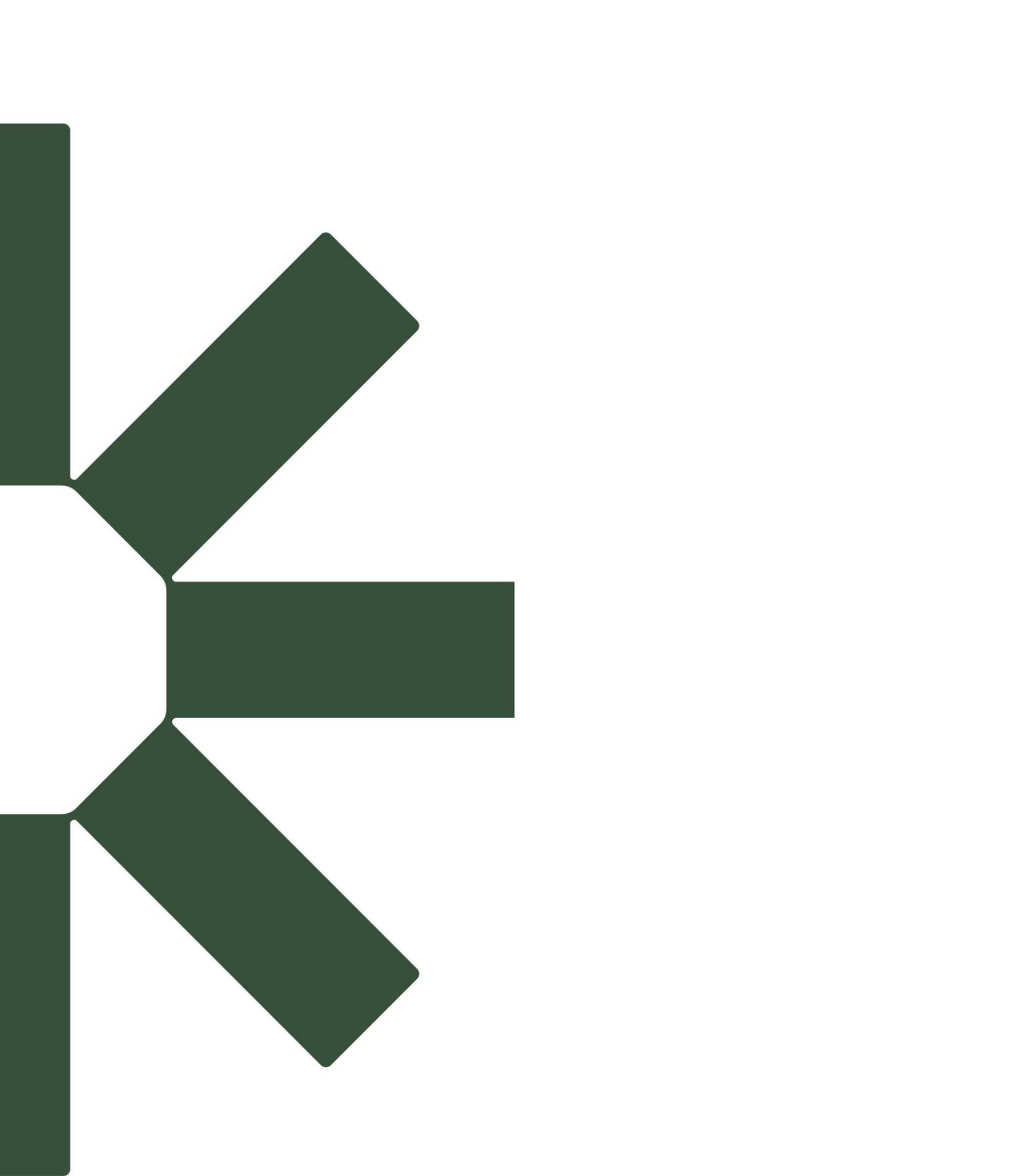
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