

# Consultation Statement

January 2019



# Consultation Statement

Purpose of this paper	To set out how the Council has consulted and engaged with the public on the preparation of the new Havant Borough Local Plan 2036.
Why?	In order to fulfil the Council's statutory duty in accordance with the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012.
Objectives	<ul style="list-style-type: none"><li>▪ To confirm which bodies and persons the Local Planning Authority has invited to make representations under Regulation 18.</li><li>▪ Set out how those bodies and persons were invited to make representations under Regulation 18.</li><li>▪ Provide a summary of the main issues raised by representations pursuant to Regulation 18.</li><li>▪ To quantify representation made pursuant to Regulation 18 and how these have been taken into account.</li></ul>

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# 1. Introduction

- 1.1 This consultation statement has been prepared in accordance with the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012 (as amended) (hereafter referred to as the Local Plan regulations). It sets out how the Council considers it has fulfilled its statutory duty to consult and engage with the public on the preparation of the new Havant Borough Local Plan 2036 (HBLP).
- 1.2 This statement identifies what consultation was undertaken and how it has influenced the Pre-Submission (Regulation 19) Plan. It has been prepared in accordance with the Local Plan regulations which require a Consultation Statement which sets out:
- which bodies and persons the local planning authority invited to make representations under regulation 18;
  - how those bodies and persons were invited to make representations under regulation 18;
  - a summary of the main issues raised by the representations made pursuant to regulation 18;
  - how any representations made pursuant to Regulation 18 have been considered.
- 1.3 The Council's Statement of Community Involvement<sup>1</sup> (SCI) sets out how the Council will involve local people when preparing planning documents. In undertaking the consultation on the Local Plan, the Council has followed the principles of the adopted SCI accordingly.
- 1.4 The Havant Borough Local Plan 2036 (HBLP 2036) will replace the Havant Local Plan (Core Strategy, 2011) (Allocations Plan, 2014) and will outline plans for how the Council will deliver its vision, manage development in the borough until 2036, whilst outlining clear policies on how and where what type of development that should take place.
- 1.5 National Planning Practice Guidance states there is considerable flexibility open to the local planning authorities in how they carry out the initial stages of plan production, provided they comply with the specific requirements with the Local Plan regulations, and make clear how any consultation fits within the wider Local Plan process<sup>2</sup>.
- 1.6 The Consultation Statement will assist the Inspector at examination in determining whether the borough's Local Plan complies with the requirements for public participation and government guidance. The report shows the consultation carried out by the Council has complied with the Local Plan regulations.

## Background

- 1.7 The Local Plan Housing Statement (LPHS) document was the first consultation at Regulation 18 stage which took place between 25th July and 9th September 2016.

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<sup>1</sup> Statement of Community Involvement December 2013

<sup>2</sup> Paragraph: 003 Reference ID: 12-003-20140306

- 1.8 Consultation on a full draft (Regulation 18) version of the Havant Borough Local Plan 2036 took place between 8th January and 16th February 2018 (Regulation 18).
- 1.9 In addition to the formal stages of the Council has also undertaken other engagement activities in the preparation of its evidence for the new HBLP 2036.

## Evidence and Structure

- 1.10 This report sets out how and when consultation was undertaken in the production of the Local Plan as follows:
- Section 2: Draft Local Plan Housing Statement
    - Who was consulted and how?
    - How many responses were received?
    - What were the main issues raised?
    - How have representations been taken into account?
  - Section 3: Draft Havant Borough Local Plan 2036
    - Who was consulted and how?
    - How many responses were received?
    - What were the main issues raised?
    - How have representations been taken into account?
  - Section 4: Other community engagement
    - Southleigh Masterplan Design Workshops
    - Call for sites
    - Hayling Island Infrastructure Advisory Committee
    - Hayling Island Seafront Survey
    - Engagement outside of formal consultation periods

## 2. Draft Local Plan Housing Statement

- 2.1 The Draft Local Plan Housing Statement (LPHS) was the Council's first step in reviewing the Local Plan.
- 2.2 The final adopted LPHS forms a clear position statement as to which sites the Council considers suitable for 'early release' prior to the adoption of the new Local Plan. It provides an interim statement in terms of identifying suitable sites capable of delivering sustainable development to address the borough's housing need up to 2036, whilst the HBLP 2036 is in production. However, it also represented the first step in determining how the need for development would be met in the new Local Plan.

### Who was consulted and how?

- 2.3 2,094 letters and 1,590 emails were sent out to statutory bodies and other consultees identified by the Council's Statement of Community Involvement<sup>3</sup> together with organisations and residents who have asked to be kept updated about planning policy and the Local Plan.
- 2.4 Consultation on the Draft LPHS (Regulation 18) document took place between 25<sup>th</sup> July and 9<sup>th</sup> September 2016. A number of methods were used to promote the consultation including:
- Letters and email newsletters were sent to those who specifically asked to be updated about the Local Plan
  - An extensive range of marketing material including the 'Why Build?' leaflet highlighting the importance of a Local Plan and the 'Where Next for Housing in Havant Borough' booklet giving more detail
  - Hard copies of the Draft LPHS of Housing Statement, Plain English Booklet and leaflets available for viewing in borough Libraries and Plaza reception
  - A specific webpage ([www.havant.gov.uk/localplan](http://www.havant.gov.uk/localplan)) with all of the consultation documents and evidence base together with details of the exhibitions and how to respond to the consultation. A button was also included on the homepage to help people get to the Local Plan page more easily.
  - Site notices were displayed at the proposed urban extension sites and the strategic sites proposed for inclusion in the Draft LPHS
  - Seven public exhibitions at:
    - Emsworth – Emsworth Community Centre – 10<sup>th</sup> August (4pm-7pm)
    - Hayling Island – United Reformed Church – 15<sup>th</sup> August (4pm-7pm)
    - Havant & Bedhampton – Bedhampton Social Hall – 18<sup>th</sup> August (4pm-7pm)

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<sup>3</sup> Statement of Community Involvement December 2013 Appendix 1

- Waterlooville – Phoenix Centre – 22<sup>nd</sup> August (4pm-7pm)
- Leigh Park – Leigh Park Community Centre – 25<sup>th</sup> August (4pm-7pm)
- Havant Public Service Plaza – 31<sup>st</sup> August (12pm-7pm)
- Stride Centre – 2<sup>nd</sup> September (4pm-7pm)

The exhibition banners were also displayed in the atrium of the Public Service Plaza in Havant when not in use at the public exhibitions.

- Extensive social media engagement through the Borough Council's own Facebook and Twitter accounts, including updating the Facebook landing page with the Local Plan 2036 branding.
- Specific Facebook adverts promoted on the walls of everyone in the borough promoting the Local Plan consultation, reaching those who do not specifically follow the Borough Council's account

2.5 In addition to the above, the Council hosted media briefings, attended meetings with resident associations prior to the publication of Cabinet papers. The Council also held two specific meetings for residents who own and lease property inside the strategic site between Denvilles and Emsworth (later known as Southleigh) as part of the consultation.

2.6 Consultees were able to provide feedback to the Council through submission of letters or emails.

## How many responses were received?

2.7 A total of 826 individual responses were received in response to the consultation.

2.8 A petition of 1,087 signatures was also submitted by the West Bedhampton Residents Association. The Emsworth Neighbourhood Planning Forum also conducted a survey regarding the proposals. Further information can be found in the Council report which is attached at Appendix 1 of this report.

2.9 All of the consultation responses which were received are available on the Council's website at [www.havant.gov.uk/localplan](http://www.havant.gov.uk/localplan).

## What were the main issues were raised?

2.10 A detailed breakdown of the comments that were received and how it was proposed that those comments were be taken forward can be found at Appendix 2 of this report.

2.11 Many of the representations were received raised concerns regarding infrastructure, a large number of which raised specific concerns regarding infrastructure on Hayling Island. Stakeholders highlighted issues relating to flooding, highway capacity, the single access to the island, healthcare, education and the provision of utilities.

## How have representations been taken into account?

2.12 In response to key issues raised through consultation on the Draft LPHS, the Council determined that sites on Hayling Island were not appropriate for 'early release' and the site or areas specific

issues raised by stakeholders would be fully explored through the new Local Plan. The sites on Hayling Island included in the Draft LPHS were subsequently re-categorised as having 'uncertain potential' in the SHLAA and the adopted LPHS.

- 2.13 In response to concerns around infrastructure raised by stakeholders more generally, the Council acknowledged that further evidence was needed to understand what infrastructure was needed and where to need future development. As such, the following recommendations were included within the Cabinet report to Full Council on 7<sup>th</sup> December (see Appendix 1):

*"... a further change [to the LPHS] is proposed to require within Guiding Principle 4 and its supporting text that any site outside the identified Urban Area (Policy AL2) may only be considered [acceptable] in principle if accompanied by a comprehensive Infrastructure Delivery Statement, produced as agreed by and in collaboration with the Local Planning Authority."*

*That the Havant [Borough] Local Plan 2036 proceeds to Pre-Submission stage only after a further public consultation takes place on a full Havant Borough Local Plan 2036, which shall include a comprehensive Local Plan Infrastructure Delivery Statement ...."*

- 2.14 The former recommendation is reflected in Guiding Principle 4 of the LPHS which confirms that sites identified for early release will only be permitted where accompanied by an Infrastructure Delivery Statement, produced as agreed by an in collaboration with the Local Planning Authority. The Council has also published guidance and a template for Infrastructure Delivery Statements which is available at [www.havant.gov.uk/localplan](http://www.havant.gov.uk/localplan).
- 2.15 In terms of the latter recommendation, the Council published a draft Infrastructure Delivery Plan (IDP) as part of the Draft HBLP 2036 consultation. This included an extensive analysis of infrastructure in the borough to support the development proposed in the Draft HBLP 2036.
- 2.16 In addition to the above, the Council has continued to engage extensively with the local community on infrastructure capacity issues on Hayling Island and Langstone through the formation of the Hayling Island Infrastructure Advisory Committee. Further information can be found in Section 4.

## 3. Draft Havant Borough Local Plan 2036

3.1 Following the Council’s adoption of the LPHS in December 2016, the next stage in the Local Plan production was to consult on a full draft of the HBLP 2036.

### Who was consulted and how?

3.2 1,745 letters and 1,903 emails were sent out to statutory consultees identified in the Council’s Statement of Community Involvement together with organisations and residents who have asked to be kept updated about planning policy and the Local Plan.

3.3 Consultation on a draft version of the Havant Borough Local Plan 2036 between 8th January and 16th February 2018. A number of methods were used to promote the consultation including:

- Letters and email newsletters to those who specifically asked to be updated about the Local Plan.

- An extensive range of printed material including, Plain English ‘Where Next’ Booklets covering the Council’s plans for housing, infrastructure, the environment, as well as commerce and town centred.

- Gateway leaflet titled ‘What is the plan, and how can I get involved?’ was also available.

- Posters placed in prominent town centre locations in Havant and Waterlooville promoting the dates and times of the public exhibitions (see image right).



- Hard copies of the Draft HBLP 2036, Plain English Booklet and leaflets available for viewing in borough Libraries and Plaza reception.
- A specific webpage ([www.havant.gov.uk/localplan](http://www.havant.gov.uk/localplan)) with all of the consultation documents and evidence base together with details of the exhibitions and how to respond to the consultation.
- Site notices at all of the proposed site allocations.
- Ten public exhibitions at:
  - Crookhorn – South Downs College – 15<sup>th</sup> Jan (3pm-7pm)
  - Farlington – Church of the Resurrection – 17<sup>th</sup> Jan (3pm-7pm)
  - Hayling Island – United Reform Church – 26<sup>th</sup> Jan (3pm-7pm)
  - Havant – Meridian Shopping Centre – Saturday 27<sup>th</sup> Jan (10am-4pm)
  - Emsworth – Emsworth Baptist Church – 30<sup>th</sup> Jan (3pm-7pm)

- Hayling Island – Hayling Island Community Centre – 31<sup>st</sup> Jan (3pm-7pm)
  - Havant - Havant Public Service Plaza – 1<sup>st</sup> Feb (12pm-7pm)
  - Leigh Park – Leigh Park Community Centre – 5<sup>th</sup> Feb (3pm-7pm)
  - Denvilles - Stride Centre – 9<sup>th</sup> Feb (3pm-7pm)
  - Waterlooville – Waterlooville Community Centre – Saturday 10<sup>th</sup> Feb (10am-7pm)
- The exhibition banners were also displayed in the atrium of the Public Service Plaza in Havant when not in use at the public exhibitions (see image right).
  - Extensive social media engagement through the Borough Council's own Facebook and Twitter accounts.
  - Specific Facebook adverts promoted on the walls of everyone in the borough promoting the Local Plan consultation, reaching those who do not specifically follow the Borough Council's account.



- 3.4 In addition to the above, the Council hosted media briefings as well as attending meetings with community groups and other stakeholder groups during the consultation.
- 3.5 Consultees were able to provide feedback to the Council through an online survey, and submission of letters or emails. The questions included within the online survey encouraged participants to focus their comments on particular policies and sites they were interested in and invited participants to say what changes they wanted to see in the plan.

## How many responses were received?

- 3.6 A total of 505 individual responses were received in response to the consultation.
- 3.7 Two petitions were received through the consultation. These were treated as responses to the consultation. Further information can be found in the Overview and Summary Report which can be found at Appendix 3 of this statement.

## What were the main issues were raised?

- 3.8 A summary of the key issues raised for each policy or topic is provided at Appendix 4. It outlines:
- A summary of all the representations received;
  - Key changes to be considered for the Pre-Submission HBLP 2036; and
  - The 10 new sites to be considered for inclusion as potential site allocations the Pre-Submission HBLP 2036.

# How have representations been taken into account?

- 3.9 The summary report (Appendix 4) indicates that some changes to some degree for almost all of the policies included in the Draft HBLP 20363. The need to further consider the principle of development for land at Westwood Close (H10), land south of Lower Road (H22) and Northney & Sparkes Marina (H30).
- 3.10 The following changes reflected in Pre-Submission HBLP 2036 following consultation on the Draft HBLP 2036 particularly notable:
- The deletion of the proposed site allocation at Westwood Close (H10)<sup>4</sup>.
  - The preparation of a Hayling Island Seafront Regeneration Study to better understand the visitor economy in the future, as well as providing justification for the Council's approach to the regeneration on the seafront. This included a survey of users, details of which can be found in the following section.
  - The inclusion of a policy relating to veteran trees and hedgerows.
  - The preparation of a Strategic Flood Risk Assessment to demonstrate that flood risk has the Council has undertaken a sequential approach in selecting sites for allocation in the HBLP 2036.

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<sup>4</sup> Land south of Lower Road (H22) and Northney & Sparkes Marina (H30) are included as site allocations in the Pre-Submission HBLP 2036.

## 4. Other community engagement

### Southleigh Masterplan Design Workshops

- 4.1 Levitt Bernstein was commissioned by the Council to coordinate a series of community workshop events to inform the preparation of a Masterplan document for the land between Denvilles and Emsworth.
- 4.2 The consultation process included an online needs assessment to gather a wide selection of local opinions. This was followed by two workshops held at the Emsworth Baptist Church on the 2nd and 30th of March 2017 and included roughly 100 residents from the area surrounding the site. During the workshops local residents, together with facilitators from Havant Borough Council and Levitt Bernstein developed ideas and visions that will provide the foundations for a final masterplan document.
- 4.3 The Southleigh Masterplan Consultation Summary can be found on the [Council's website](#).

### Call for sites

- 4.4 The Havant Borough Local Plan 2036 needs to be considered developable to be found sound. As such, the sites in the plan need to be available and have at least a reasonable prospect of delivery to be considered developable under the National Planning Policy Framework.
- 4.5 As such, the Council undertook two call for sites at the start of 2016 and 2017. This generated a large number of responses which were assessed through the Strategic Housing Land Availability Assessment and Sustainability Appraisal in order to determine which sites should be allocated.
- 4.6 Sites were also submitted through the two formal consultations under Regulation 18. A small number were submitted outside of the formal submission periods but were considered nonetheless

### Hayling Island Infrastructure Advisory Committee

- 4.7 The committee was formed in specific response to the infrastructure capacity issues on Hayling Island which were highlighted through the 2016 consultation on the Draft LPHS (see Section 2). The group is made up of officers from Havant Borough Council, Hampshire County Council (as Highways Authority) and community groups representing Hayling Island and Langstone. Ward councillors and county councillors are also invited to participate in meetings. The terms of reference for the group are at Appendix 5.
- 4.8 The group provides on the ground advice regarding infrastructure capacity on Hayling Island and its links to the mainland. The committee has periodically met to review information and evidence base to inform the HBLP 2036 and provide feedback on the results and conclusions of these studies.
- 4.9 A number of successful meetings of the group took place throughout 2017 and 2018. However, at the meeting on 16<sup>th</sup> January 2019, the residents on the group read the following statement:

*“Residents and non-aligned committee members (ie those committee members not council officers and councillors) demand that the following is recorded:*

*A) That the meeting minutes and the official traffic review/assessment of the A3023 includes the following wording in its Introduction section: “This traffic assessment was undertaken and completed without the involvement or concurrence of the Hayling Island Infrastructure Advisory Committee.”*

*B) It is not considered possible for this Committee to respond to the A3023 evaluation (which has taken 750 days to complete) in a two-hour fuzzy slide presentation. This evaluation was done without any input from us and is not the agreed process.”*

## Hayling Island Seafront Survey

- 4.10 Hemingway Design was commissioned by the Council to run an online survey for residents, visitors, people who work on the Island and those who have left to live elsewhere, as part of their work on the Hayling Island Seafront Regeneration Study.
- 4.11 The online survey ran for six weeks over the summer period between 20<sup>th</sup> August and 24<sup>d</sup> September 2018. A total of 865 responses were received, of which 567 were residents and/or work on the island and 263 of which were visitors/holiday makers. Hemingway Design and Havant Borough Council also hosted a workshop for stakeholders and local businesses of Hayling Island on 28<sup>th</sup> September 2018 which helped shape the emerging options for the regeneration of the seafront.
- 4.12 A summary of the key findings from the survey and the business workshop can be found in the Hayling Island Seafront Regeneration Study on the [Council's website](#).

## Engagement outside of formal consultation periods

- 4.13 As well as formal consultation, the Council has also undertaken extensive engagement with key stakeholders throughout the Local Plan's preparation.
- 4.14 This includes a large number of discussions with a number of the specific consultation bodies. Statements of Common Ground will be prepared where necessary and will set out how the two bodies have collaborated to overcome the constraints in the Borough.
- 4.15 A number of discussions have also taken place with neighbouring authorities. This largely takes place through the Partnership for Urban South Hampshire (PUSH). This is a collaboration of the various Local Authorities along the Solent coast. Havant Borough Council and Chichester District Council also meet regarding Local Plan development both as part of the formal consultation process and outside them.

# Appendix 1 LPHS Cabinet Report

# Appendix 2 LPHS Consultation Responses

# Appendix 3 Draft HBLP 2036 summary report

# Appendix 4 Draft HBLP 2036 Consultation Summary Tables

# Appendix 5 Hayling Island Infrastructure Advisory Committee Terms of Reference



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(Cabinet Report as amended by supplementary information (changes shown in italics))

## HAVANT BOROUGH COUNCIL

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### CABINET

16 November 2016

### Local Plan Housing Statement

Report by: David Hayward

### FOR RECOMMENDATION TO COUNCIL

**Cabinet Lead (HBC): Cabinet Lead for Economy, Planning, Development and Prosperity Havant**

**Key Decision: Yes**

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#### 1.0 Purpose of Report

- 1.1 To feed back to Cabinet the full results of the recent Local Plan consultation and recommend that changes should be made to the Local Plan Housing Statement before its adoption.

#### Recommendations

##### 2.1 *Cabinet is recommended to:*

- a) *Note the responses to the recent consultation (Appendix 1).*
- b) *Approve the proposed changes to the Local Plan Housing Statement (as set out in appendix 1).*
- c) *In addition a further change is proposed to require within Guiding Principle 4 and its supporting text that any site outside the identified Urban Area (Policy AL2) may only be considered in principle if accompanied by a comprehensive Infrastructure Delivery Statement, produced as agreed by and in collaboration with the Local Planning Authority.*
- d) *That the Havant Local Plan 2036 proceeds to Pre-Submission stage only after a further public consultation takes place on a full Havant Borough Local Plan 2036, which shall include a comprehensive Local Plan Infrastructure Delivery Statement referring to every site identified for housing development and included in the Local Plan Housing Statement.*
- e) *That the Council make representations through the Council Leader and local MPs to the Secretary of State and the Housing and Planning Minister to review the five year housing supply rule to enable local planning authorities that are making positive progress on local plan reviews a moratorium on the release of sites until the local plan is adopted.*
- f) *That the Council make representations through the Council Leader and local MP's to the Secretary of State, the Housing and Planning Minister, Hampshire County Council, Solent LEP and other infrastructure bodies regarding the need to*

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*recognise the urgent need for infrastructure delivery alongside the building of new homes.*

- g) Recommend to Council that adoption of the Local Plan Housing Statement (Appendix 2) in accordance with the above and that as the Infrastructure Delivery Statement is produced it becomes a material consideration alongside the Housing Statement.*
- h) Note the Borough Council's five year housing land supply position as described in paragraphs 3.14 - 3.19.*
- i) Authorise the Head of Planning to publish a five year housing land supply summary and update it as necessary.*
- j) Delegate authority to the Head of Planning, in consultation with the Cabinet Lead for Economy, Planning, Development and Prosperity Havant to publish an updated Local Development Scheme (LDS) setting out a costed timetable for the production of the Infrastructure Delivery Statement and the Submission of the Havant Local Plan 2036*
- k) Delegate authority to the Head of Planning, in consultation with the Cabinet Lead for Economy, Planning, Development and Prosperity Havant, to make any necessary amendments to the documents listed above. These shall be limited to grammatical, typographical, formatting and graphic design changes and shall not change the meaning of the material.*

### 3.0 Summary

This report feeds back to Cabinet the results of the recent consultation on the Havant Borough Local Plan 2036 and the Draft Local Plan Housing Statement. It also highlights the issues that were raised and the proposed solutions to the Housing Statement that should be taken forward.

### 4.0 Subject of Report

#### **National context: the requirement for an up-to-date Local Plan**

- 3.1 The Local Plan remains one of the most important functions of the Council. Whilst there have been extensive changes to the planning system in recent years, this has only pushed further towards a plan-led development approach in the UK and has increased the necessity of having an up-to-date Local Plan.
- 3.2 Government have made clear, both in the National Planning Policy Framework (NPPF) as well as in legislation, that significantly boosting the supply of housing is a key national priority. If the Council submits a plan to Government that falls short of the requirements of the NPPF, the Inspector who examines the plan is able to make changes to that plan. It also remains the case that any applicant who is refused planning permission by the Council can appeal to the Secretary of State (in practice the Planning Inspectorate). The requirements of the NPPF, including the need for housing, is a significant material factor in the decision making process (see below).
- 3.3 It is essential that the Council continues to positively plan for the future of the borough through a Local Plan set within this reality. This is ultimately the best way of achieving sustainable development and creating successful places for future generations. The borough has a strong history in producing Local Plans for the area and is determined to

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keep positively planning for the future of the borough. This approach has been praised by Government. When asked by Alan Mak, Member of Parliament for Havant, whether he would congratulate Havant Borough Council on their work regarding the update to the Local Plan, Gavin Barlow, Minister of State for Housing, Planning and Minister for London, set out *“I am happy to do that. It was a pleasure to visit my hon. Friend’s constituency recently and to meet Councillor David Guest, who is leading this work on behalf of Havant Council”*<sup>1</sup>.

- 3.4 Following the recent McCarthy & Stone appeal in Purbrook the Adopted Local Plan<sup>2</sup> cannot now be considered up-to-date (see below for more detail) and as a result, any policies regarding housing supply cannot now be given the same weight as they were before. However the action that the Council takes to manage this situation will then help to determine the weight which can be given to the policies in the Adopted Local Plan<sup>3</sup>.
- 3.5 This changed national/local context has significant implications for the borough both in the short and potentially the longer term. The lessening of the weight of the large number of policies in the Havant Borough Local Plan (Core Strategy and Allocations) which address housing supply will lead to a substantial reduction in the level of influence which the Council and the borough’s communities have over future development decisions. The likelihood of losing further appeals is significantly increased and will feel for the Council and our communities that development is being done to us.
- 3.6 As a result, it is vital to keep positively planning for the future of the borough and for local communities and the Council to collaborate on the Havant Borough Local Plan 2036 in order to manage the new reality we are entering. This new Local Plan will bring significant benefits for everyone who lives, works or visits the borough of Havant and is essential in raising prosperity and providing a high quality of life.

### **The Adopted Local Plan and the PUSH Spatial Position Statement**

- 3.7 The Adopted Local Plan uses the former South East Plan housing target for the borough (315 per year from 2006 up to 2026). This figure pre-dates the NPPF and is not based on an objective assessment of housing need.
- 3.8 Under the NPPF, housing targets must be based on an objective assessment of housing need across a housing market area and there is also a ‘duty to cooperate’ with neighbouring authorities on such matters.
- 3.9 The Council fulfils the duty to cooperate principally through the Partnership for Urban South Hampshire. This is an effective partnership of all of the district and borough councils in South Hampshire along with Hampshire County Council. Ongoing discussion and cooperation also takes place with Chichester District Council as well. Such discussions are a useful way for the Council to discuss and collaborate with neighbouring authorities on those issues, such as the need for housing, which cross administrative boundaries.

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<sup>1</sup> <https://hansard.parliament.uk/Commons/2016-10-24/debates/755E26B6-847A-4623-B694-450E45E85961/HouseBuilding#contribution-71C7ED25-73E9-4A9B-B20C-A2672449620A>

<sup>2</sup> The Adopted Local Plan is made up of the Havant Borough Local Plan (Core Strategy) (<http://www.havant.gov.uk/planning-and-environment/planning-policy/local-plan-core-strategy>) and Havant Borough Local Plan (Allocations) (<http://www.havant.gov.uk/planning-and-environment/planning-policy/local-plan-allocations>).

<sup>3</sup> This has been confirmed through a recent Court of Appeal determination, which is available at <http://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Core-Strategy-and-DMP/NANT-v-SCDC-Council.pdf>

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- 3.10 Through PUSH, an objective assessment of housing need across South Hampshire's three housing market areas<sup>4</sup> was commissioned. These 'Strategic Housing Market Assessments', which were published in 2014 and 2016 show a marked increase in the number of new homes which are needed across the housing market area and in Havant Borough. The Objectively Assessed Housing Need Update in 2016 confirms the need for 121,500 new homes across the three HMAs in South Hampshire from 2011 to 2036. Of these, 11,250 need to be provided in Havant Borough<sup>5</sup>.
- 3.11 Paragraph 47 of the NPPF sets out that *"to boost significantly the supply of housing, local planning authorities should...use their evidence base to ensure that their Local Plan meets the full, objectively assessed need for market and affordable housing in the housing market area, as far as is consistent with the policies set out in (the NPPF), including identifying key sites which are critical for the delivery of the housing strategy over the plan period"*.
- 3.12 In light of the firm requirement of the NPPF to address housing need and the available evidence, the Local Planning Authorities which make up PUSH progressed a review of the South Hampshire Strategy. The resultant PUSH Spatial Position Statement was published on 7<sup>th</sup> June 2016<sup>6</sup>. This shows how the Council have cooperated with our neighbouring authorities, under the Duty to Cooperate, to put in place a high level framework to address housing need over the housing market area.
- 3.13 Nonetheless, the Spatial Position Statement stresses that the suggested targets should be treated as minima. The Council consequently undertook further, more detailed analysis to actively seek opportunities to identify how the shortfall against objectively assessed need can be met through the Local Plan process.

### Housing Supply

- 3.14 As set out above, paragraph 47 of the NPPF requires that to significantly boost the supply of housing. As well as addressing housing need, Local Planning authorities should also *"identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land."*
- 3.15 On 11<sup>th</sup> December 2015, the Council refused planning permission for a development of 42 retirement apartments for older persons at 38 London Road, Purbrook. This was subsequently appealed by the applicant and a decision issued on 25<sup>th</sup> August. The appeal was upheld and planning permission granted.
- 3.16 One of the key considerations of the appeal was whether the borough had a five year supply of deliverable sites for housing. The Council refused planning permission on the basis of having a five year supply based on the target in the Adopted Local Plan. However it was determined that whilst the housing target in the Adopted Local Plan was

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<sup>4</sup> Havant Borough is part of a wider 'PUSH East' housing market area focussed on the city of Portsmouth. This includes all of the local authorities of Havant, Portsmouth and Gosport and sections of Fareham, Winchester and East Hampshire.

<sup>5</sup> These reports are available on the PUSH website at [http://www.push.gov.uk/strategic\\_housing\\_market\\_assessment.htm](http://www.push.gov.uk/strategic_housing_market_assessment.htm).

<sup>6</sup> This is available on the PUSH website at [http://www.push.gov.uk/work/planning-and-infrastructure/push\\_spatial\\_position\\_statement\\_to\\_2034-2.htm](http://www.push.gov.uk/work/planning-and-infrastructure/push_spatial_position_statement_to_2034-2.htm).

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examined in 2013, it is not based on objectively assessed housing need as required by the NPPF.

- 3.17 As such, the borough does not have a five year supply of deliverable housing sites. In the absence of a tested housing target in an up-to-date Local Plan, it is necessary to measure supply against the objectively assessed housing need, which is 450 homes per year (the 11,250 need divided by 25 years).
- 3.18 A five year supply position would have been published with the Annual Monitoring Report. It is proposed that this is also updated periodically as the five year supply position evolves. This would be published at [www.havant.gov.uk/localplan](http://www.havant.gov.uk/localplan).
- 3.19 This appeal decision and the implications under the NPPF will have a significant impact on the level of influence which the Council and communities have over the location of new development in the borough. The only way to ensure that decisions can be taken within a robust framework is to progress a new Local Plan for the borough.

### **The Draft Local Plan Housing Statement**

- 4.1 The Council has considered the evidence regarding the need for new housing, the national requirements of the NPPF and the lack of a five year housing land supply. This results in an urgent need for a new Local Plan to be developed and adopted for the borough.
- 4.2 In the short term however, until the adoption of the Havant Borough Local Plan 2036, the Local Plan Housing Statement should be developed and adopted as a means of managing development pressure as much as possible. The Local Plan Housing Statement would:
- Be the vital first stage in the development of the Havant Borough Local Plan 2036
  - Identify how the high housing need for the borough would be addressed and
  - Identify small and medium sized greenfield urban extension sites which could be released in advance of the completion of the Local Plan in order to provide a healthy housing land supply.
- 4.3 On 20<sup>th</sup> July 2016, Cabinet approved:
- a. A review of the Havant Borough Local Plan (Core Strategy and Allocations)
  - b. The consultation of the Draft Local Plan Housing Statement
  - c. The Local Development Scheme 2016
- 4.4 Consultation on the Draft Local Plan Housing Statement took place from 25<sup>th</sup> July to 9<sup>th</sup> September. A number of methods were used to promote the consultation:
- An extensive range of printed material. The [Why Build?](#) Leaflet, highlighting the importance of a Local Plan and the [Where Next for Housing in Havant Borough?](#) booklet giving more detail
  - Seven public exhibitions at:
    - Emsworth – Emsworth Community Centre – 10<sup>th</sup> August (4pm-7pm)
    - Hayling Island – United Reformed Church – 15<sup>th</sup> August (4pm-7pm)
    - Havant & Bedhampton – Bedhampton Social Hall – 18<sup>th</sup> August (4pm-7pm)
    - Waterlooville – Phoenix Centre – 22<sup>nd</sup> August (4pm-7pm)

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- Leigh Park – Leigh Park Community Centre – 25<sup>th</sup> August (4pm-7pm)
- Havant Public Service Plaza – 31<sup>st</sup> August (12pm-7pm)
- Stride Centre – 2<sup>nd</sup> September (4pm-7pm)

N.B: The exhibition banners were also up permanently in the atrium of the Plaza

- 85 site notices across the proposed strategic sites and urban extension sites highlighting their inclusion in the Draft Local Plan Housing Statement
- Two specific meetings for residents who own and lease property inside the strategic site between Denvilles and Emsworth
- A specific webpage ([www.havant.gov.uk/localplan](http://www.havant.gov.uk/localplan)) with all of the consultation documents and evidence base together with details of the exhibitions and how to respond to the consultation. A button was also included on the homepage to help people get to the Local Plan page more easily
- Extensive social media engagement through the Council's own Facebook and Twitter accounts, including updating the Facebook landing page with the Local Plan 2036 branding
- Specific Facebook adverts promoted on the feed of everyone in the borough promoting the Local Plan consultation, reaching those who do not specifically follow the Borough Council's account
- Email newsletter to those who specifically asked to be updated about planning policy consultations
- 2094 letters and 1590 emails sent out to statutory consultees together with organisations and residents who have asked to be kept updated about planning policy and the Local Plan

4.5 The exhibitions (Figure 1) were very well attended, showing the enthusiasm and interest of the borough's residents in the Local Plan.

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Figure 1: The Denvilles exhibition on 2<sup>nd</sup> September

- 4.6 The webpage for the Havant Borough Local Plan 2036 ([www.havant.gov.uk/localplan](http://www.havant.gov.uk/localplan)) was set up on 12<sup>th</sup> July. From that date until 9<sup>th</sup> September, it was the third most viewed webpage on the Borough Council's website behind only the homepage and the 'contact us' page. In all, during that time, there were 8,132 page views by 5,860 different people.
- 4.7 The general posting on the Borough Council's Facebook page was displayed on 6,025 Facebook accounts and generated 253 clicks through to the Local Plan webpage. The posts also generated 335 reactions, comments and shares. These can be viewed at <https://www.facebook.com/232177686880758/posts/999736343458218>.
- 4.8 Facebook promotion also took place to reach those who don't specifically follow the Council. These adverts were displayed on 50,768 Facebook accounts and generated 2,071 website clicks. This represented the most successful social media promotion that the Council has undertaken and successfully engaged with a high number of residents; previous campaigns have achieved around 1,000 clicks.

### **Consultation responses received**

- 4.9 A total of 825 individual responses were received to the consultation. This is higher than the level of responses which were received to the equivalent consultation for the Allocations Plan.
- 4.10 The high level of response to the consultation shows that the consultation strategy which the Council chose worked successfully. Thanks should also be extended to all of those

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groups and organisations who have worked with the Council to help promote the consultation in their communities through events, newsletters, posters, surveys and social media.

- 4.11 A petition of 1,087 signatures was submitted by the West Bedhampton Residents Association. This sets out that (emphasis in original) “We the undersigned **oppose** the draft local **plan 2036** & the local plan housing statement. Policies **AL2** (which restricts development between the green gaps between existing built up areas) and **CS17** (aimed at concentrating on existing urban areas) should not be cancelled. A full traffic impact study should be carried out. We oppose losing prime agriculture land and request that a full ecological study is undertaken considering how near we are to the **site of special scientific interest.**”
- 4.12 The Emsworth Neighbourhood Planning Forum also conducted a survey regarding the proposals. The results of this are highlighted in Appendix 1 of this report under Guiding Principle 1.
- 4.13 All of the consultation responses which were received are available on the Council’s website at [www.havant.gov.uk/localplan](http://www.havant.gov.uk/localplan).

### Issues that were raised through the consultation

- 4.14 A detailed breakdown of the comments that were received and how it is proposed that those comments be taken forward is at Appendix 1 of this report.
- 4.15 There were a number of comments that were raised more extensively and in relation to the plan in general or across most or all of the sites. These are:
- Concern over the capacity of the highway network to accommodate further development
  - Concern over the capacity of supporting physical and social infrastructure, particularly GP surgeries and schools (both primary and secondary)
  - Other community services and facilities (leisure, shops and other facilities) are already strained
  - Concern over the loss of gaps between settlements, urbanisation and the proliferation of urban sprawl
  - Concern over the evidence regarding objectively assessed need and the role of the Partnership for Urban South Hampshire (PUSH)
  - Impact on ecology
  - Concerns over loss of trees and open spaces for their quality of life, health, leisure and recreation benefits.

### Suggested changes to the Housing Statement

- 4.16 A large number of representations have been received which raise concerns regarding the way forward with the Local Plan Housing Statement. The consultation highlighted specific concerns regarding infrastructure on Hayling Island which will require further investigation before development can be considered sustainable under the NPPF. In particular, stakeholders highlighted issues relating to flooding, highway capacity, the single access to the island, healthcare, education and the provision of utilities. These are strategic issues which relate to the island as a whole and not necessarily within the

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ability of a single development proposal to overcome in the absence of a comprehensive framework, which can only be provided through the new Local Plan.

- 4.17 Further evidence is needed to fully resolve these issues. As such, the Council considers that it cannot be guaranteed that the sites are suitable for development. The Council will, however, continue to explore the sustainability of future development on Hayling Island through the production of the Havant Borough Local Plan 2036 and the evidence base which supports it. It will continue to explore the evidence regarding the suitability of development on these sites, actively working with our partners at the Eastern Solent Coastal Partnership, Hampshire County Council (as Highways Authority and Local Education Authority), and the South East Hampshire Clinical Commissioning Group and utility operators. This will inform the approach towards these sites in the Pre-Submission draft of the Havant Borough Local Plan 2036.

### In the Draft Local Plan Housing Statement

#### Early Release sites

Highlighted in Table 2 of the Draft Housing Statement:

North of Hollybank Lane and Long Copse Lane

North of Long Copse Lane

Rear of Redlands House

North and west of Selangor Avenue

Littlepark House

South of Lower Road

Adjacent 47 Portsdown Hill Road

East of Castle Avenue

Southleigh Park House

Forty Acres

South of Rook Farm

North of Rook Farm

West of Rook Farm

Station Road

#### Strategic Sites

Highlighted on page 11 of the Draft Housing Statement:

Campdown

Denvilles-Emsworth

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### As proposed now

#### Early Release sites

Long Copse Lane  
Rear of Redlands House  
Selangor Avenue  
Littlepark House  
South of Lower Road  
East of Castle Avenue  
Southleigh Park House  
Forty Acres  
North of Fort Purbrook  
East of College Road

#### Strategic site

Area between Denvilles and Emsworth

- 4.18 Through the consultation, a number of new sites were also submitted to the Council for consideration for inclusion in the Housing Statement. The suitability of these sites for development will be explored further through evidence base for the Havant Borough Local Plan 2036. Site plans are provided at appendix 3 for illustrative purposes only.
- 4.19 The approach towards sites on Hayling Island as well as those submitted through the consultation is specifically highlighted within the proposed changes to the Housing Statement.
- 4.20 Following the consultation comments that have been received and the five year supply position, the following changes are also proposed for the Housing Statement:
- Extensive re-working of Section 2 (The Adopted Local Plan) to reflect the five year supply situation.
  - Changes to Sections 1 (Introduction) and 2 to 'tell the story' more effectively, setting out the context for the housing statement more effectively and how the Housing Statement is the first stage in developing the Havant Borough Local Plan 2036.
  - Removal of the site 'Adjacent to 47 Portsdown Hill Road' due to concerns that it is not possible to achieve a development of five homes on the site without causing harm to the adjacent listed building.
  - Change 'prioritise' brownfield sites to 'promote' the development of brownfield sites.
  - Merge the individual sites in the Draft Housing Statement to a comprehensive development site at Long Copse Lane (Emsworth).
  - Re-categorisation of Campdown from a Strategic Site to two urban extension sites (Land North of Fort Purbrook and Land East of College Road).
  - Include commitments to the Council pursuing further evidence base relating to the review of the Solent Waders and Brent Goose Strategy, a commitment to implementing the full Solent Recreation Mitigation Strategy and regarding the impact on European nature conservation sites from air quality.
  - Further emphasise that the Housing Statement only considers that the housing need is sufficient to deviate from Policies CS17 and AL2 (which delineate the urban areas of the borough) on certain specific sites and that the remainder of the Adopted Local Plan must be complied with.
  - Further emphasis on the comprehensive nature of the development of the Denvilles-Emsworth Strategic Site, which includes the delivery of the essential infrastructure

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including the new school and A27 junction. An outline planning application covering the entirety of the strategic site is considered necessary.

- 4.21 Further detail of all changes proposed following the consultation is set out in Appendix 1. The proposed Local Plan Housing Statement, with those changes made, is at Appendix 2.
- 4.22 *The thorough work on the Housing Statement has demonstrated that housing development relies on coincident supporting infrastructure. The Council has taken a bold initial approach in drafting the Havant Local Plan 2036 with the first stage preparation of the Local Plan Housing Statement which is an innovative step to address the Objectively Assessed Need.*
- 4.23 *The Borough relies on Government investment in strategic infrastructure. Such investment is required to solve key bottlenecks and congestion issues in particular access from the A3M and A27 to Langstone Technology Park and the A27 Prosperity Corridor. Infrastructure investment is also needed in potable, surface and foul water systems, education, healthcare and broadband. It is critical that the Council works with Government to plan for the necessary infrastructure to be determined, designed, funded and implemented as necessary ahead of housing supply.*
- 4.24 *The Council is committed to working collaboratively with infrastructure providers on the Local Plan Infrastructure Statement. As a second tier authority Havant Borough Council relies on Hampshire County Council and other statutory and non-statutory organisations such as, utility companies and the NHS.*
- 4.25 *Paragraph 1.9 of the Local Plan Housing Statement confirms that the Havant Borough Local Plan 2036 will need to identify the infrastructure that is needed and plan for its delivery in a sustainable manner. Additionally it is essential for the sustainable development of any site currently identified as being outside Policy AL2 to demonstrate that the infrastructure serving the site is adequate.*
- 4.26 *It is proposed that a Local Plan Infrastructure Delivery Statement is developed in consideration of housing development sites identified in the Housing Statement, with specific focus on Hayling Island, acknowledging the single route of access via the A3023. The Council will set out a template of what is expected to be included in an Infrastructure Delivery Statement focusing on costed, deliverable solutions to address any identified requirements. This will be taken forward along with, and informed by, the full plan Transport Analysis which has already been commissioned and is underway.*
- 4.27 *The Local Plan Infrastructure Delivery Statement would then form part of the full draft Havant Borough Local Plan 2036. This will then be subject to public consultation<sup>7</sup>.*
- 4.28 *In pragmatic terms (in the light of the 5 year supply position) the best way to provide the necessary local infrastructure alongside housing in the short term is through the Local Plan Housing Statement. By accepting the principle of housing development on the sites*

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<sup>7</sup> This would constitute a further formal consultation under Regulation 18 The Town and Country Planning (Local Planning) (England) Regulations 2012

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in table 2, the Council can have a positive dialogue with the development industry on the measures needed to make sure that the sites comes forward in a sustainable manner.

### Conclusions and next steps

- 4.29 The consultation which took place from July to September represents the first step in reviewing the Adopted Local Plan and producing the Havant Borough Local Plan 2036. However further extensive engagement with the community regarding the Strategic Site through a Design Charrette<sup>8</sup>. This will enable all stakeholders in the site to come together and become a mutual author of a masterplan for the site. Pre-submission consultation will also take place on the Havant Borough Local Plan 2036 when stakeholders will be able to look at the detailed proposals in the plan and comment on whether they are sound and legally compliant. There will also be an Examination of the Plan by a Government Inspector, who will examine whether the plan is sound, taking account of the NPPF, the available evidence and the views of stakeholders.
- 4.30 The approach and content of the Local Plan Housing Statement and the approach which is proposed for reviewing the Local Plan are bold and forward thinking. The proposals by their nature have been controversial. However it is considered that the proposed way forward remains the best one for the borough: boosting prosperity, providing homes which are needed and ensuring that the Council and local communities remain in the driving seat of the Local Plan process - directing where, when and how development takes place as much as is possible in the context of national policy and regulation.
- 4.31 It is proposed that the Local Plan Housing Statement will be a pragmatic interim step in reviewing the Local Plan and will be proposed for adoption supported by an extensive evidence base. It remains imperative that the borough has an up-to-date Local Plan and so work will continue to prepare the Havant Borough Local Plan 2036 Pre-Submission Draft.

## 5.0 Implications

- 5.1 **Resources:** The proposed approach to developing the Havant Borough Local Plan 2036 was incorporated into the 2016/17 budget. Specific budget codes relating to consultancy and travel in particular were sized to match the increase in cost associated with the Local Plan and PUSH Spatial Position Statement preparation work in this financial year.
- 5.2 However the Local Plan's preparation will span two financial years and so the Local Plan's project plan will also need to inform the forthcoming budget setting for the 2017/18 year. This will specifically require an increase in certain budget codes due to the need to pay for the Examination and Program Officer together with future evidence base work. It is anticipated that the cost of the Examination and a Programme Officer (most likely resourced through the use of an external consultant) will be in the range of £70,000 - £90,000. However there will be a decrease in consultancy spend during the 2017/18 year compared to 2016/17 of a comparable level to the Examination costs. Current staffing resource within the Planning Policy Team is considered generally sufficient (subject to the provisions of para 5.5 below) to meet the milestones in the Local Development Scheme which was published on 20<sup>th</sup> July 2016. The full detail of

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<sup>8</sup> More detail regarding this is available in the consultation documents, which are on the Council's website at [www.havant.gov.uk/localplan](http://www.havant.gov.uk/localplan) and in the Local Plan Housing Statement.

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this will be established through the 2017/18 budget setting process. There are no additional costs anticipated for this financial year 2016-17.

- 5.3 Given the uncertain situation which the Council now faces without a five year housing land supply, it is envisaged that there will be a significant amount of development pressure, particularly with the 'early release' sites. This will lead to an increase in major<sup>9</sup> pre-application meetings and planning applications. Resourcing the determination of these would take place within existing Development Management budgets wherever possible.
- 5.4 It is likely that there will be proposals for sites which were rejected through the Strategic Housing Land Availability Assessment or even sites which were not submitted to the Council but are nonetheless pursued through a speculative planning application. This would result in an increase in planning appeals in the 2017/18 year. This will feed into the 2017/18 budget setting process.
- 5.5 However it is ultimately not possible to predict the precise resource requirements with any degree of certainty. This will depend on the number and nature of applications and appeals, the sites that they are on and the issues to be discussed. This would determine the length of the appeal and whether it is likely to be an informal hearing or a public inquiry. Again, resourcing of this would be sought within existing Development Management and Planning Policy budgets wherever possible.
- 5.6 External legal costs would also be incurred to support planning appeals. A barrister to support a 1-2 day public inquiry would cost a minimum of £3,000 and for a longer one proportionately more. If there is an important case and a QC is required, this would cost a minimum £10,000. In any instance in an appeal where costs are awarded against the Council due to a decision being made unreasonably, it would be necessary to cover costs incurred by the Council as well as the appellant. A risk weighted approach has been used to estimate the impact of the planning appeals. The estimated costs for this will be included within the 2017-18 budget setting process.
- 5.7 The Design Charrette will be specifically funded through the £60,000 grant from the Department of Communities and Local Government's Neighbourhood Planning & Local Planning Service Redesign & Capacity Building Fund. This was awarded on 4 February 2016. The bid which the Borough Council submitted was specifically to put in place a Design Charrette for this site. There are no specific conditions to this grant. Work regarding this project will be kept separate from the Local Plan from a budgeting perspective as the grant funding will be ringfenced for this work. It is considered that £60,000 was sufficient funding to cover the cost of the Design Charrette.
- 5.8 **Legal:** In order to progress development of the Area Between Denvilles and Emsworth Strategic Site, it will be necessary for the Council and the landowner to vary a legal agreement which exists on the land. There is past precedent as this has already been done for the crematorium's development as well as for the Adopted Local Plan.

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<sup>9</sup> Defined as schemes of 10+ new homes

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- 5.9 It is noteworthy that the Local Plan Housing Statement would fall outside of the regulatory process for preparing a local plan (see section on risks below). Otherwise, preparation of the Local Plan would follow the appropriate regulations.
- 5.10 **Strategy:** The Council has a number of policy approaches and strategies such as the approach towards its own estate, the role in managing town centres and economic development and environmental health. These collectively interact and the Corporate Strategy distils them together into a comprehensive statement of the objectives of the Borough Council.
- 5.11 The Local Plan to a certain extent then follows on from the Corporate Strategy, turning its focus to delivery and putting in place the framework that is needed to physically deliver the Council's objectives.
- 5.12 It does this by setting out what development happens when, where and how. It also crucially sets out what infrastructure needs to be provided alongside that development.
- 5.13 **Risks:** The proposed approach is based on the production of a non-statutory planning document. It must ultimately be adopted by Full Council before planning weight can be given to it. The Housing Statement is also subject to Sustainability Appraisal, Habitats Regulations Assessment and an Integrated Impact Assessment in the same way as any statutory Local Plan. However the weight which will ultimately be afforded to it by Inspectors is not certain.
- 5.14 *If the Local Plan Housing Statement is not approved it will in all likelihood simply result in the decisions being made at ad hoc appeals (on the basis of the NPPF) and little or no supporting infrastructure being provided. Planning by appeal would have cost implications for the Council (see finance section above) with the consequential loss of control over planned infrastructure provision.*
- 5.15 *Whilst the Local Plan 2036 (including the Infrastructure Delivery Statement) progresses to formal Submission it is normally the case that limited weight can be given to it. Therefore it is important to update the timetable (LDS) of the Local Plan (including the Infrastructure Delivery Statement) and clarify the weight that might be given to the work as it progresses.*
- 5.16 *Without a positive approach to Plan making (in a national context of a plan led system) the Council would be unable to attract infrastructure investment as there is no certainty for investment without an adopted local plan. Dunsbury Hill Business Gateway benefited from a £4.5m LEP investment because of the certainty provided by its allocation in the current Local Plan. Moving forward, this is likely to be the case with the Area between Denvilles and Emsworth. This has the potential to deliver infrastructure which will have a significant, positive effect on the surrounding area. However bids for external funding for that will only be possible on the back of its inclusion within an up-to-date Local Plan.*
- 5.17 *Increasing loss of community trust in the leadership of the Council in terms of understanding where development will take place, what form it might take and what supporting infrastructure will be provided.*

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- 5.18 *Havant has an excellent reputation for place making and being open for business. Investors need the level of certainty which only a Local Plan can provide in order to make investment decisions which can create and maintain a significant number of jobs.*
- 5.14 **Communications:** Please see the main body of the report.
- 5.15 **For the Community:** Please see the main body of the report.
- 5.16 The Integrated Impact Assessment (IIA) has been completed and shows that the adoption of the Local Plan Housing Statement will not lead to a disproportionate impact on any specific element of the community.
- 5.17 **Consultation:** Please see the main body of the report.

### Appendices

- Appendix 1: Local Plan Housing Statement and Havant Borough Local Plan 2036 Consultation Responses
- Appendix 2: Local Plan Housing Statement
- Appendix 3: Sites with uncertain potential at this stage - site maps

### Background Papers:

- PUSH Spatial Position Statement ([http://www.push.gov.uk/work/planning-and-infrastructure/push\\_spatial\\_position\\_statement\\_to\\_2034-2.htm](http://www.push.gov.uk/work/planning-and-infrastructure/push_spatial_position_statement_to_2034-2.htm))
- PUSH Strategic Housing Market Assessments (2014 and 2016 objectively assessed need update) ([http://www.push.gov.uk/work/planning-and-infrastructure/strategic\\_housing\\_market\\_assessment.htm](http://www.push.gov.uk/work/planning-and-infrastructure/strategic_housing_market_assessment.htm))
- National Planning Policy Framework ([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf))

### Agreed and signed off by:

Head of Legal Services: Abe Ezekiel - 1<sup>st</sup> November 2016  
Head of Finance: Craig Richards - 8<sup>th</sup> November 2016  
Head of Planning: Andrew Biltcliffe - 3<sup>rd</sup> November 2016  
Director of Operations: James Hassett – 8<sup>th</sup> November 2016  
Cabinet Lead for Economy, Planning, Development and Prosperity Havant: Cllr David Guest - 2<sup>nd</sup> November 2016

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# Appendix 1

## Local Plan Housing Statement and Havant Borough Local Plan 2036 Consultation Responses



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# Acronyms & Glossary

CDC	Chichester District Council
EA	Environment Agency
GP	Guiding Principle
HBC	Havant Borough Council
HE	Highways England
HE	Historic England
HCC	Hampshire County Council
NE	Natural England
PCC	Portsmouth City Council
SDNP	South Downs National Park
RSPB	Royal Society for the Protection of Birds

**AF** Affordable housing

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

**AMR** Annual Monitoring Report

The purpose of the Annual Monitoring Report is to annually assess and report on the progress being made in respect of the preparation of Local Plan documents and to assess the extent to which development plan policies are being implemented in terms of the decisions made through the development management process.

**CIL** Community Infrastructure Levy

The Community Infrastructure Levy is a levy that local authorities can charge on developments in their area. CIL income can be used to fund additional infrastructure required to support new development including roads, schools, green spaces and community facilities.

**HMA** Housing Market Area

A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between where people live and work. Generally speaking, they are a functional economic area within which the majority of people both live and work. Housing market areas generally cut across various planning authority boundaries. Havant Borough is part of the wider Portsmouth Housing Market Area.

HRA	<p>Habitats Regulation Assessment</p> <p>The Habitats Regulations Assessment (HRA) examines the likely significant effects of policy proposals in the plan on the integrity of European Sites of nature conservation importance within, close to or connected to the plan area. European Sites are areas of international nature conservation importance that are protected for the benefit of the habitats and species they support.</p>
IDP	<p>Infrastructure Delivery Plan</p> <p>The Infrastructure Delivery Plan will support the Havant Borough Local Plan 2036. It will set out the level of development to be delivered and how, where and when infrastructure will be provided as far as possible. It will consider health, education, social, and community infrastructure, water supply, waste water, telecommunications, coastal defences and flood alleviation, green infrastructure and transport.</p>
LEP	<p>Local Enterprise Partnership</p> <p>Local Enterprise Partnerships are voluntary partnerships between businesses and local authorities whose geography reflects the natural economic areas which seek to drive sustainable private sector-led growth and job creation in their area. Havant Borough is in the Solent LEP area.</p>
NPPF	<p>National Planning Policy Framework</p> <p>The National Planning Policy Framework sets out the Government’s planning policies for England and how these are expected to be applied.</p>
NPPG	<p>National Planning Practice Guidance</p> <p>Together with the NPPF, the National Planning Practice Guidance sets out guidance on key topics including what should be included in Local Plans and how to prepare them.</p>
PDL	<p>Previously Developed Land (as defined by the NPPF)</p> <p>Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.</p>
PUSH	<p>Partnership for Urban South Hampshire</p> <p>PUSH is a partnership of Hampshire County Council; the unitary authorities of Portsmouth, Southampton, and the Isle of Wight; and district authorities of Eastleigh, East Hampshire, Fareham, Gosport, Havant, New Forest, Test Valley and Winchester. PUSH authorities recognise the benefits of working together to support the sustainable economic growth of the sub region and to facilitate the strategic planning functions necessary to support that growth.</p>
OAN	<p>Objectively Assessed Need</p> <p>The starting point in planning for housing is that objectively assessed need for the housing market area should be met within it.</p>
SINC	<p>Site of Importance for Nature Conservation</p>

Sites within Hampshire that are of particular importance for nature conservation at a county level, containing habitats or features that are effectively irreplaceable (excluding statutory designated sites).

SHMA Strategic Housing Market Assessment

The SHMA is a key component of the evidence base that will help to inform the production of the Havant Borough Local Plan 2036. It considers the overall need for housing, the need for different types of homes, and the housing needs of different groups in accordance with the requirements of the NPPF.

[http://www.push.gov.uk/strategic\\_housing\\_market\\_assessment.htm](http://www.push.gov.uk/strategic_housing_market_assessment.htm)

SHLAA Strategic Housing Land Availability Assessment

The SHLAA is a key component of the evidence base that will help to inform the production of the Havant Borough Local Plan 2036. It considers whether there is sufficient land for housing delivery.

<http://www.havant.gov.uk/local-plan-2036-shlaa-8th-edition-pdf-616-kb>

SPZ Source Protection Zone

The Environment Agency defines SPZs for all groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk.

Further details can be found at: <http://apps.environment-agency.gov.uk/wiyby/37833.aspx>

SUDS Sustainable Urban Drainage Systems

SUDS are a range of management practices and control mechanisms that drain surface water in a way that mimics natural drainage and reduces the adverse impacts on river regimes and the risk of erosion, flooding and ecological damage.

TA Transport Assessment

The TA is a key component of the evidence base that will help to inform the production of the Havant Borough Local Plan 2036. It will consider the likely traffic impacts of the proposed new housing and employment development identified through the Local Plan and the impacts on the strategic road network.

# GP1: Review of the Local Plan to address housing need and general comments about planning for future development

131 responses were received regarding this topic

## Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Support the Council's proactive decision in Guiding Principle 1 to undertake a review of the Local Plan (Core Strategy) and Local Plan (Allocations Plan) in order to meet objectively assessed needs (OAN) and plan for development.	Support noted.
Support for ambitious and proactive approach taken in Housing Statement.	Support noted.
Commend Council for efforts made in identifying sites.	Support noted.
No objection to any of the areas suggested for new housing.	Support noted.
Accept need for homes - no particular issues with the allocation document. Building will happen where the market needs it.	Support noted.
Particularly welcome paragraphs 1.16 and 1.17 of Housing Statement.	Support noted.
A petition of 1,087 signatures which oppose the Draft Local Plan 2036 and the Local Plan Housing Statement.	Opposition noted.
The Council is too readily accepting further development in the Borough; should listen to residents concerns and demonstrate that OAN (objectively assessed need) figures cannot be accommodated.	Addressing housing need is not something which can be ignored. If the Council does not continue positively planning for the future, the Government will take that role out of the Council's hands and their overarching aim is to get more homes built. The Council therefore considers the best way forward is to accept what cannot be changed: there is a high housing need and the NPPF requires local authorities to seek to meet that need. From this starting point, the Council can then focus on the detailed aspects to make sure that the development that does take place is sustainable and well-integrated into local communities and provides the infrastructure that is needed to support it.

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Do not accept the need for further homes - questions over need to address the OAN locally.	Housebuilding is one of the Government's top priorities, and the NPPF makes clear that local plans should meet the full OAN for their area unless doing so would be contrary to other policies in the NPPF. Even with all the sites put forward in the housing statement, the full OAN will not be met.
Do not accept the need for further homes – questions raised over the assumptions made in the Strategic Housing Market Assessment (SHMA)/ the OAN work.	The OAN is based on the best available evidence and was undertaken by an independent consultant following a nationally prescribed methodology in the National Planning Practice Guidance.
The OAN figures were established before Brexit, and should be now be reviewed.	The OAN is based on the best evidence available at this moment in time. It is too early to anticipate future migration patterns, as the exact conditions of Britain's exit from the EU remain uncertain, and it is not feasible to delay the production of the Local Plan until further details emerge. In any case, it should be noted that the housing sites put forward for inclusion in the new Local Plan do not meet the full OAN, so any reduction in international migration is unlikely to mean the site allocations put forward are not needed.
Concern that the potential of some areas has not been fully explored.	HBC considers that it has comprehensively assessed the development potential for housing sites in the Borough. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) <sup>1</sup> and the Housing Constraints and Supply Analysis <sup>2</sup> .
The Council has provided no rationale for why it has decided to prepare a Local Plan Housing Statement rather than proceeding	Paragraphs 1.6 and 1.7 explain that the Housing Statement forms the first formal step in the Local Plan preparation process.

<sup>1</sup> <http://www.havant.gov.uk/local-plan-2036-shlaa-8th-edition-pdf-616-kb>

<sup>2</sup> <http://www.havant.gov.uk/local-plan-2036-housing-constraints-and-supply-analysis-pdf-127-mb>

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## Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>immediately to a review of the Local Plan. Interim Statements have no weight and are inappropriate.</p> <p>Weight given to Housing Statement should be limited given lack of adequate evidence to support proposals/full process required for Local Plans.</p>	<p>It is acknowledged that the Housing Statement will have less weight than a Local Plan, but it sets out a direction of travel and forms the starting point for the Havant Borough Local Plan 2036 which will be fully evidenced and formally examined before adoption.</p>
<p>Housing Statement has provided no reasonable alternatives or options and cannot therefore be shown to the most appropriate strategy, as such may not meet tests of soundness – need to ‘show workings’.</p>	<p>There is no obligation to present options at the Regulation 18 stage. The Council is confident that it has explored and comprehensively assessed all the reasonable alternatives for development in the Borough. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA)<sup>3</sup> and the Housing Constraints and Supply Analysis<sup>4</sup>. These will form part of the evidence to demonstrate the soundness of the plan at examination.</p>
<p>Housing Statement does not provide robust approach to three dimensions of sustainability as set out in NPPF; it is in conflict with both social and environmental tenets. Core land use principles in para 17 have not been achieved. More effort needed to ensure vitality of existing urban areas.</p> <p>Local Plan Housing Statement approach risks prejudicing the Council's ability to make wider decisions in relation to other needs of the district - holistic approach needed. Concern that no consideration has been given to non-residential uses and other</p>	<p>The Housing Statement focuses on housing sites by its nature. There are strong social elements to this (see NPPF para 7 which sets out the three dimensions of sustainable development).</p> <p>The Local Plan (Core Strategy) and Local Plan (Allocations) documents remain in place and address the full range of planning principles set out at NPPF para 17. The review process of the Local Plan, for which the Housing Statement is the starting point, will also address all the core planning principles.</p>

<sup>3</sup> <http://www.havant.gov.uk/local-plan-2036-shlaa-8th-edition-pdf-616-kb>

<sup>4</sup> <http://www.havant.gov.uk/local-plan-2036-housing-constraints-and-supply-analysis-pdf-127-mb>

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uses.	
<p>Emphasis in plan is on numbers and higher densities but there is no mention of quality of life.</p> <p>Must deliver high density, but achieve good quality.</p> <p>Few developments in the Borough improve HBC's record in sustainable development or the NPPF's core planning principles.</p> <p>Lack of high expectations from developers results in poor design, landscape and visual impact of many developments.</p>	<p>The Local Plan (Core Strategy) and Local Plan (Allocations) documents remain in place and address the full range of planning principles, including quality of development. The Havant Borough Local Plan 2036 will also address these wider issues.</p>
HBC have not considered policy or environmental constraints.	<p>The Council's review of constraints is published in its Housing Constraints and Supply Analysis<sup>5</sup> paper.</p>
<p>The PUSH Spatial Position Statement allocates Havant 9,170 net additional homes between 2011 and 2034. However the Housing Statement refers to the 11,250 need from 2011 to 2036. Difficult to understand why HBC chosen to use raw number and ignore the allocation reached after deliberations between 12 neighbouring authorities under Duty to Cooperate.</p>	<p>The NPPF makes clear that Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change.</p> <p>The PUSH work is a Position Statement only and is not adopted policy. While it will be taken into account, it is against the OAN that the Local Plan will be judged at Examination. It is for this reason that HBC is preparing a plan to 2036, which seeks to address OAN of 11,250 homes from 2011 to 2036, rather than the 9,170 set out in the PUSH Spatial Position Statement<sup>6</sup> that runs from 2011 to 2034. Nevertheless it should be noted that the proposed allocations do not meet housing need and would form a housing target which would be similar to that in the Spatial Position Statement.</p>

<sup>5</sup> <http://www.havant.gov.uk/local-plan-2036-housing-constraints-and-supply-analysis-pdf-127-mb>

<sup>6</sup> [http://www.push.gov.uk/work/planning-and-infrastructure/push\\_spatial\\_position\\_statement\\_to\\_2034-2.htm](http://www.push.gov.uk/work/planning-and-infrastructure/push_spatial_position_statement_to_2034-2.htm)

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>PUSH Position Statement identifies significant unmet need in wider housing market area. Question whether Havant's unmet need would be able to be met by other authorities in the HMA.</p> <p>The Council should re-examine the potential of land within Havant Borough to meet future needs.</p>	<p>HBC considers that it has comprehensively assessed the development potential for housing of sites in the Borough. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the Housing Constraints and Supply Analysis<sup>1</sup>. Guiding Principle 6 in the Housing Statement also makes clear that the Council will continue to work with its neighbours and other relevant organisations to continue to seek to meet the unmet need.</p>
<p>11,250 dwellings should be treated as a minimum as it is not clear at this stage whether other authorities will look to Havant to meet their unmet need.</p>	<p>Guiding Principle 6 in the Housing Statement makes clear the Council will continue to work with its neighbours and other relevant organisations to continue to seek to meet the unmet need (both in Havant and of other authorities).</p>
<p>Unable to find figure of 11,250 dwellings on PUSH Position Statement.</p>	<p>The figure is shown in Table 1 on p.14 of the PUSH Spatial Position Statement<sup>7</sup>.</p>
<p>Given the constraints placed on the Borough, any alternatives that might exist are unlikely to be any more acceptable.</p>	<p>Noted.</p>
<p>Other areas should be developed – South Hampshire/the South is under too much pressure.</p>	<p>There is no overarching national or regional plan. Authorities must work with their neighbours to meet the objectively assessed need in their Housing Market Area (HMA). In Havant's case, this is the wider Portsmouth HMA.</p>
<p>HBC should resist further development and work collaboratively</p>	<p>The Council works collaboratively with its neighbouring authorities through the Partnership for Urban South Hampshire (PUSH)<sup>8</sup>. The partner authorities are committed to working together to address</p>

<sup>7</sup> [http://www.push.gov.uk/work/planning-and-infrastructure/push\\_spatial\\_position\\_statement\\_to\\_2034-2.htm](http://www.push.gov.uk/work/planning-and-infrastructure/push_spatial_position_statement_to_2034-2.htm)

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
along the south coast.	housing and other needs across the area (see also Guiding Principle 6 in the Housing Statement). The Council also works with its neighbouring authorities that are not in PUSH under the Duty to Cooperate, particularly Chichester District Council.
Regeneration of urban areas, in particular Havant Town Centre, and brownfield sites should be considered before greenfield sites.	Urban areas, including Havant Town Centres have been considered. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) <sup>9</sup> and the Housing Constraints and Supply Analysis <sup>10</sup> . The Local Plan (Core Strategy) and Local Plan (Allocations) documents remain in place and identify brownfield sites for development. Guiding Principle 3 confirms that previously developed sites will be considered positively. It is not possible, however, to meet the Borough's housing need on brownfield sites alone.
There are a number of areas with planning permission which have not started. Need to ensure they are delivered before allocating new land.	The Council works proactively with landowners and developers to try to bring forward unimplemented permissions. Table 1 of the Housing Statement shows that outstanding planning permissions have been taken into account in assessing how many further sites need to be allocated, and that bringing forward these permissions would not eliminate the need to make allocations.
Empty homes should be used before planning new ones.	Local authorities have limited power to intervene in relation to private land; that is, the Council cannot force private owners to sell their homes. The total amount of empty homes in the Borough (at 05/10/2015) is 948, of which only 248 are long term (6 months+) vacant, the rest being vacant

<sup>8</sup> <http://www.push.gov.uk/>

<sup>9</sup> <http://www.havant.gov.uk/local-plan-2036-shlaa-8th-edition-pdf-616-kb>

<sup>10</sup> <http://www.havant.gov.uk/local-plan-2036-housing-constraints-and-supply-analysis-pdf-127-mb>

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Key issues raised by residents and other stakeholders	HBC response
	due largely to market churn. The proportion of homes that are vacant is less than the south east and national average (as set out on p. 92 of the 2014 SHMA <sup>11</sup> ).
Areas designated as Green Belt should remain protected.	There are no Green Belt designations in Havant Borough.
Accept need for homes in principle.	Support noted.
Area is already overcrowded/has already seen a lot of additional development in recent years. Please stop building.	The Council accepts that a high level of development has taken place in the Borough in the last two years, although previously housebuilding was below the Core Strategy target. Housing need remains high. The Council is committed both to delivering further housing, as well as ensuring that quality of life remains high.
Would like to see phasing of development in 5 year periods.	The housing trajectory in 5 year periods is set out each year in the Annual Monitoring Report (AMR) <sup>12</sup> . This lists sites and their estimated completion dates. The Council will continue to publish these 5 year estimates in the AMR, rather than include information in the Housing Statement, so as to keep them up to date.
Suspect financial motivation behind the plan/corruption in Council.	These claims are unsubstantiated. If wrong doing by the Council or individual officers is suspected, a formal complaint should be made and backed up with evidence. See <a href="https://www.havant.gov.uk/complaints">https://www.havant.gov.uk/complaints</a> .
Plan only serves to profit developers/land owners.	It is accepted that developers and landowners will make a profit from development. If this was not

<sup>11</sup> [http://www.push.gov.uk/south\\_hampshire\\_shma\\_final\\_report\\_16.1.14\\_.pdf](http://www.push.gov.uk/south_hampshire_shma_final_report_16.1.14_.pdf)

<sup>12</sup> <http://www.havant.gov.uk/planning-and-environment/planning-policy/local-plan-core-strategy/annual-monitoring-reports>

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	the case, they would not develop. However, this is not what motivates the plan.
Concern over loss of agricultural land.	The NPPF expects local planning authorities to seek to use areas of poorer quality land in preference to that of a higher quality, where significant development of agricultural land is demonstrated to be necessary. However a balance must be struck with the requirement to meet identified housing needs in the Borough, particularly given that housing need cannot be met. Some loss of higher quality land cannot therefore be avoided.
Level of development will have a negative effect on the character of the area and the quality of life for residents.	The Council acknowledges that further development will affect the character of the area. However, the Council is committed both to delivering further housing, as well as to ensuring that quality of life remains high.
Planning for the area should be done in such a way that protects the separation between, and the identities of, the individual settlements.	Development requirements on site layout will be included in the site allocation in the Local Plan to ensure that the development does not result in the loss of settlement identity.
Do not accept the need for further homes – Government does not require the proposed level of development or development of the sites proposed.	The Government have made housing a key national priority with the aim of a million new homes being built by 2020. It is a key priority of the National Planning Policy Framework (NPPF) that we need to 'significantly boost the supply of housing'.
Plans should be delayed – current Local Plan is still fit for purpose. Early review raises questions over purpose/weight of any Local Plan.	It is acknowledged that the Local Plan is being reviewed sooner than might have been anticipated. This has become necessary because new evidence has emerged on the housing need for the area, and the Council has lost an appeal against its refusal to permit a housing development, which calls into question whether the Local Plan can be considered up to date. There is therefore an urgent need to review the plan in order to retain some measure of control over local decision making.
It appears the Council is guessing future requirements.	The NPPF requires Councils to draw up plans over a long time horizon of 15 years or more, so as to consider future requirements. The future requirements used as the basis for the plan are

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	professionally conducted assessments of need using published statistics.
Concerns over loss of trees and open spaces <i>per se</i> and for their quality of life/health/leisure and recreation benefits.	In order to address the Borough's housing need it is inevitable that all undeveloped areas, that are free from significant constraints, need to be considered for development. However, the Council is keen to ensure that, where possible, trees are retained within new development and high quality, new open space is incorporated within the design and the layout.
Development could have significant impact on wildlife/ecology - rich flora and fauna will be lost.	It is acknowledged that development of greenfield sites will have some impact on wildlife on the sites affected. The Council participates in ongoing discussions with bodies such as Natural England, the RSPB and the Hampshire and Isle of Wight Wildlife Trust to identify any key issues and ways in which impacts can be mitigated. More detail on these matters will also be required to support any planning application on the sites, so that impacts and proposed mitigation measures can be considered in detail.
Development plan should establish creation and maintenance of functioning ecological network – suggest ecological network mapping approach.	The Council with PUSH has established a Green Infrastructure Strategy <sup>13</sup> and a Mitigation programme through the Solent Recreation Mitigation Partnership (SRMP) <sup>14</sup> , and supports and uses the results of the Solent Waders and Brent Goose Strategy <sup>15</sup> , all of which include a consideration of networks.
Seriously concerned that the further proposed sites will lead to a direct loss of habitat functionally linked to the Special Protection Area (SPA). Due to scale of individual housing developments or	The Council is committed to continuing engagement in the SRMP and the definitive mitigation strategy and to implement that strategy once it's approved. The Housing Statement will be updated to highlight where development is proposed on sites which have any likelihood of Brent

<sup>13</sup> <http://www.push.gov.uk/work/sustainability-and-social-infrastructure.htm>

<sup>14</sup> <https://www.portsmouth.gov.uk/ext/community-and-environment/environment/solent-recreation-mitigation-strategy.aspx>

<sup>15</sup> [http://www.solentforum.org/forum/sub\\_groups/Natural\\_Environment\\_Group/Waders%20and%20Brent%20Goose%20Strategy/](http://www.solentforum.org/forum/sub_groups/Natural_Environment_Group/Waders%20and%20Brent%20Goose%20Strategy/)

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<p>proximity to SPA further mitigation measures may be required in addition to the SRMP.</p> <p>Urgent need for better understanding of the network of sites supporting Brent Geese and waders and protect accordingly. Further work is required before the housing sites can be considered further.</p>	<p>Goose/wader use. The Habitats Regulations Assessment (HRA) should highlight menu of options and explore whether there is a mitigation option that can be accommodated within the site without harming site deliverability.</p>
<p>Natural environment should sit at heart of place making.</p>	<p>It is agreed that consideration of the natural environment is part of place-making. However the needs of the natural environment must be balanced with social and economic needs.</p>
<p>People should be protected as well as wildlife.</p>	<p>Planning must balance the needs of people and wildlife.</p>
<p>Development will have significant effect on the already busy highway network in the area (strategic and local roads)/roads can't cope.</p>	<p>The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highway network, and establish what mitigation measures are needed. The Council will continue to work with Hampshire County Council, as Highway Authority, Highways England and providers of public transport to assess and provide solutions to any capacity issues in the network.</p>
<p>Concern over cost of infrastructure, which may not have effect of relieving capacity issues.</p>	<p>Investment in infrastructure will be based on an assessment of need and what provides the best solution.</p> <p>Smaller items of infrastructure, which are needed to make a development work, will be funded by developers through legal agreements with the Council. The Local Plan gives the Council more leverage to require such infrastructure if it is included in the plan and/or the allocation for that specific site. These are generally delivered alongside the development, so they are operational when the development is occupied.</p> <p>Having a plan in place will allow the Council to bid for funds for strategic infrastructure.</p>

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Concerns over air quality/pollution/noise from increased traffic.	The Council will explore the issue for the new Local Plan and work with Natural England on the results of modelling and any necessary avoidance and mitigation measures. A commitment to this will be included in the Housing Statement.
Concerns over road safety.	Road safety will form an integral part of the assessment of possible solutions to highways issues.
Will need new and improved cycle provision.	New development is expected to make provision for infrastructure through CIL and site specific S106 obligations. If it is considered that there is a need for improvements to pavements/cycle routes associated with the development, these will be considered as part of the planning process. The Local Plan gives the Council more leverage to require such infrastructure if it is included in the plan and/or the allocation for that specific site.
Public transport is inadequate – improvements to bus service, train service and train stations needed.	With regard to public transport; the Council is aware of the concerns residents have raised regarding the provision of public transport. The Council does not itself provide public transport services, but liaises with rails and bus service providers to ensure they are aware of proposed levels of development, and to seek to improve services and facilities.
Doctors, health centres, hospitals and other health services are already strained. Development can only be supported with infrastructure improvements.	The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the Clinical Commissioning Group and the NHS to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.
Local schools are already strained. Development can only be supported with infrastructure improvements.	The Council is aware of residents' concerns regarding education provision. The Council is working closely with Hampshire County Council as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.

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Key issues raised by residents and other stakeholders	HBC response
<p>Other community services and facilities (including social care, leisure, open space, dog park, waste services, places of worship, police and emergency services etc.) are already strained. Development can only be supported with infrastructure improvements.</p>	<p>The Council will seek to ensure that high quality, new open spaces are provided as part of new developments. The Council also charges developers under the Community Infrastructure Levy, and uses funds to provide community infrastructure.</p> <p>Through local plan policies, the Council seeks to protect community facilities wherever possible. It should be noted, however, that publicly run facilities are under severe budgetary pressures and all Councils are reviewing the viability of these services. In addition, many leisure facilities are private businesses, and the Council cannot force these to be set up or remain open. However, if opportunities do arise and the Council is able to help enable the provision of facilities the Council will assist where appropriate.</p>
<p>Concern over impact on utilities infrastructure.</p>	<p>The Council is aware of the residents' concerns regarding utility provision. Utility providers (water, gas, electricity) have a statutory obligation to provide services to new development. The Council works with these providers to ensure they are aware of proposed levels of development so that they can plan accordingly.</p>
<p>Infrastructure should be delivered before development takes place.</p>	<p>A key part of the drafting of the Local Plan is to identify the infrastructure needed to make the development of sites sustainable.</p> <p>Smaller items of infrastructure, which are needed to make a development work, will be funded by developers through legal agreements with the Council. These are generally delivered alongside the development, so they are operational when the development is occupied.</p> <p>In terms of strategic infrastructure, in a climate of extremely limited resources, forward funding of infrastructure is not always possible. However, having a plan in place will allow the Council to bid for funds for strategic infrastructure in order to bring these forward at the earliest opportunity.</p> <p>Throughout the local plan preparation process, the Council is also in continuous dialogue with the providers of infrastructure, such as utility companies, Hampshire County Council for highways and schools, and the NHS. It should be noted, however, that it is the responsibility of these bodies to</p>

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	bring forward the infrastructure they deem necessary to meet the needs of the existing population.
Developers should provide or pay for infrastructure.	Developers provide or pay for infrastructure through S106 Legal Agreements and/or the Community Infrastructure Levy.
Support for affordable housing.	Support noted.
HBC should consider their affordable housing strategies to ensure development of truly sustainable in urban centres through a regeneration agenda. This will promote high levels of accessibility required to services.	The Council continues to support and promote the delivery of affordable housing and the regeneration of urban areas. This does not, however, preclude the need for affordable housing in new developments on greenfield sites.
Questions over whether homes will actually be affordable.	The Council is not in a position to control the prices developers demand for homes. The Council can, however, try to improve the supply of new homes by identifying sites suitable for development. It can also seek a proportion of affordable homes <sup>16</sup> (Social rented, affordable rented and intermediate housing) in developments.
Need to consider affordable rental properties as well as for sale.	Agreed. Affordable housing in new developments currently includes social rented, affordable rented and intermediate housing <sup>9</sup> . In future, the Council may have to accept Starter Homes <sup>17</sup> as affordable housing due to proposed changes in national policy.

<sup>16</sup> As defined by Annex 2: Glossary of the National Planning Policy Framework  
<http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/annex-2-glossary/>

<sup>9</sup> As defined by Annex 2: Glossary of the National Planning Policy Framework  
<http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/annex-2-glossary/>

<sup>17</sup> <http://planningguidance.communities.gov.uk/blog/guidance/starter-homes/starter-homes-guidance/>

## GP1: Review of the Local Plan to address housing need and general comments about planning for future development

131 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Object to affordable housing – residents will not benefit the area.	There is a very high need for affordable housing in the Borough, and the Council should seek to address this need wherever possible to ensure mixed and balanced communities.
Suspect that housing will not be for children of residents, but will be bought by people from outside the area.	The Strategic Housing Market Assessment <sup>18</sup> takes into account a number of factors in determining housing need, including household formation, economic growth and population change. In terms of population change, both migration (within the UK and international) and natural change (births minus deaths) are considered, and the figures do show a high level of past trends in population change due to migration into the housing market area. The objectively assessed need that Councils are required to address is informed by both types of population change, and it is not possible to plan only for the needs of the population of the Borough. It should be noted that the Council cannot control who buys property in the area. It is likely that on any development, it will be a mixture of people from within and from outside the Borough.
Concerns over employment opportunities - need jobs and apprenticeships; need to attract employers.	The Council is working hard to attract new business and bring forward employment sites, for example at developments such as Dunsbury Hill Farm. Through the Local Plan, we are able to ensure that larger developments include an Employment and Skills Plan which provides apprentices for local young people on that site.
Need for housing for the elderly.	The Local Plan (Core Strategy) supports a mix of housing types, and specifically acknowledges the need to provide accommodation for the ageing population. This need will also be considered as part of the new Local Plan.
By what process will types of properties needed be determined	The mix of housing that is developed is determined largely by market forces. However, the Local

<sup>18</sup> [http://www.push.gov.uk/strategic\\_housing\\_market\\_assessment.htm](http://www.push.gov.uk/strategic_housing_market_assessment.htm)

## GP1: Review of the Local Plan to address housing need and general comments about planning for future development

131 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
(family, retirement, affordable, singles, housing association)?	Plan (Core Strategy) supports a mix of housing types, and specifically acknowledges the housing needs of the ageing population, and sets out what requirements will be made from developers to supply affordable housing.
Plan needs to say more about the impacts of development and how they will be addressed.	The Housing Statement focussed on setting out potential sites for development. While it acknowledged that this would bring with it the need to improve infrastructure this was perhaps not drawn out sufficiently. As well as amending the Housing Statement, it is in any case the Council's intention to focus further on these matters as the Local Plan progresses.
There is insufficient information in the consultation document on the location and use class of sites that could be developed.	The Housing Statement is clear that the sites proposed are for housing, and in the case of the strategic sites other proposed uses area listed. Each of the sites has a plan showing its location, extent and proposed number of dwellings.
Planning Authorities are advised to use the Health & Safety Executive's Planning Advice Web App.	Advice noted.
Plan needs to ensure adequate parking standards.	The Core Strategy includes a policy on parking standards in new development (Policy DM14). A Parking Supplementary Planning Document (SPD) was adopted on 27th July 2016 <sup>19</sup> . This policy requirement will be reviewed through the Havant Borough Local Plan 2036.
Plan will exacerbate the North/South divide, concentrating industries and population in the over-developed south.	There is no National Plan to change the location of homes and industry. Each local authority must look to meet the needs of its area, working with its neighbours.

<sup>19</sup> <http://www.havant.gov.uk/sites/default/files/documents/Final%20Parking%20SPD.pdf>

## GP1: Review of the Local Plan to address housing need and general comments about planning for future development

131 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Work needs to be done on raising the profile and developing the identity of Havant and each of its communities and features.	The Council is working hard to raise the profile of Havant and attract investment into the area. <a href="https://www.havant.gov.uk/prosperity-havant">https://www.havant.gov.uk/prosperity-havant</a>

Key issues raised by statutory consultees	HBC response
<b>Emsworth Neighbourhood Forum:</b>	
<p>Survey conducted - 109 responses: 68% object, 10% support, 9% neutral, 13% did not say</p> <p>Summary of comments from survey:</p> <ul style="list-style-type: none"> <li>• Process - need for new local plan and consultation period over summer</li> <li>• Impact on/provision of community facilities - schools, GPs</li> <li>• Concerns over infrastructure</li> <li>• Concerns over the capacity of the highway network</li> <li>• Scale of development</li> <li>• Concerns over impact on ecology/nature conservation</li> <li>• Loss of green space</li> <li>• Concerns over pollution</li> <li>• Affordability for local young people</li> <li>• Quality and design of properties</li> <li>• Accept need for homes in principle</li> <li>• Opportunities for new infrastructure and support for retailers</li> <li>•</li> </ul>	Comments are addressed individually above, or in other tables.

Key issues raised by statutory consultees	HBC response
<b>South Eastern Hampshire Clinical Commissioning Group:</b>	
<p>High proposed housing numbers will impact ability to deliver healthcare services; GP practices already stretched; Private funding required is - CIL/S106 needed to support health needs of new population;</p> <p>Developing detailed estate plan for Havant Area - to understand and model health care for existing and new population.</p>	<p>The Council notes that health facilities are stretched and supports the preparation of an estate plan for the Borough to adapt services for the changing needs of the population. HBC confirms that the sites and numbers in the draft Housing Statement have been fed into that process, and the Council will continue to work with the CCG to enable them to make plans for health care provision going forward. The Council has a bidding process for CIL funds, and the CCG are free to make bids to draw on these funds. Bids are assessed against a number of criteria, one of which being whether the proposal supports the Local Plan.</p>
<b>Southern Gas Networks:</b>	
<p>No changes to earlier representation or additional commentary on plan. SGN review contents of plans to ensure optimum development of gas supply.</p>	<p>Noted.</p>
<b>Hampshire County Council:</b>	
<p>Note that HBC have not yet undertaken a supporting Transport Statement/Evidence Base, but understand that one is programmed. HCC as Highways Authority therefore unable to support or object to the allocations and reserve the right to comment further when evidence becomes available.</p> <p>Evidence base should focus on key areas of concern regarding the capacity of the highway network:</p> <ul style="list-style-type: none"> <li>• A3023, Hayling Island</li> <li>• Park Road Corridor including Solent Road</li> <li>• Campdown development</li> <li>• Denvilles Development</li> <li>• Deliverability/Financing of major infrastructure proposals</li> </ul>	<p>The Council have commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport, to provide solutions to any capacity issues in the network.</p>

Key issues raised by statutory consultees	HBC response
Education Authority has already taken into account urban extension sites in terms of school place planning.	Noted.
<b>Southern Water:</b>	
<p>Would look for policies that support the timely provisions, on a site by site basis, of any local sewerage infrastructure required to service individual allocated sites. The principle is that new development needs to connect to the sewerage system at the nearest point of adequate capacity. This may require off-site infrastructure if the nearest point is not located within the immediate vicinity of the site.</p> <p>Comments regarding sewer capacity/connection requirements for each site provided.</p>	Inclusion of a general policy and/or development requirements for each site will be considered for inclusion in the Local Plan.
<b>Highways England:</b>	
Would welcome opportunity for continued engagement.	The Council is committed to continuing engagement with partners.
<b>Chichester District Council:</b>	
Welcomes approach in responding to evidence on housing need.	Support noted.
<b>Environment Agency:</b>	
Pleased that flood risk has been considered in assessing sites for development.	Support noted.
No concerns which would prevent strategic sites coming forward.	Support noted.
Havant and Bedhampton - sensitive in terms of groundwater (source protection zone 1).	This will be noted in the Local Plan development requirements.

Key issues raised by statutory consultees	HBC response
More specific comments could be included in any site specific development criteria.	The Council intends to include site specific commentary on any development constraints in any allocations that are made in the Local Plan, which is the next step following on from the Housing Statement.
<b>Natural England:</b>	
Concerned at this stage with the lack of evidence underpinning the HRA and SA. Need to understand when these issues will be fully assessed, and HBC need to demonstrate that there are workable and deliverable mitigation options available for these housing allocations.	HRA and SA will need to demonstrate that there are workable and deliverable mitigation options available for the housing allocations put forward in the Local Plan. HBC will continue to work with Natural England to ensure that the Local Plan contains a fully evidenced base HRA and SA.

<b>Proposed Modifications to the Housing Statement</b>		
<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Local Plan	Appropriate commentary on development and policy requirements will be considered further in the production of the Havant Borough Local Plan 2036.	See above.

## GP2: Up-to-date status of the Local Plan

4 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>Publication of the Strategic Housing Market Assessment (SHMA) with a higher objectively assessed need (OAN) and a lack of five year housing supply indicate the policies relating to the supply of housing within the Local Plan should not be considered up to date and should have limited weight in planning decisions. National Planning Policy Framework Paragraph 14 - the presumption in favour of sustainable development therefore applies.</p>	<p>The Council recognises the SHMA indication of housing need (11,250 houses in the Borough between 2011 and 2036) remains to be tested through examination by an independent Inspector. However, the Council has recently lost an appeal (PINS ref. APP/X1735/W/16/3145929) against its refusal to permit a housing development in which a key consideration was whether the Council was able to demonstrate an up-to-date supply of housing when measured against the higher OAN.</p> <p>The Inspector concluded the Council could not demonstrate a five year supply of housing, and its housing policies could not be considered up-to-date at that particular point in time. However, it does not follow that the Adopted Local Plan is automatically out-of-date or that no weight should be applied to its policies. Permission will only be granted for housing proposals where development can be shown to constitute 'sustainable development' in accordance with Paragraphs 14, 47 and 49 of the NPPF.</p> <p>It is proposed to amend the wording of Guiding Principle 2 and its supporting text accordingly.</p>
<p>There is a five year housing supply.</p>	<p>The OAN is based on the best available evidence and was undertaken by an independent consultant following a nationally prescribed methodology. Housebuilding is one of the Government's top priorities, and the NPPF makes clear that local plans should meet the full OAN for their area unless it would be contrary to the NPPF to do so. The population is naturally rising and we have an increasing elderly population. Together, these create a large need for new housing.</p>
<p>Why so many homes?</p>	<p>National planning policy (NPPF para 157) expects local plans to cover a period of at least fifteen years from the date of adoption. Where strategic sites are concerned these generally take much longer to plan to ensure that all the necessary infrastructure can be provided in a timely manner so a longer term view is often required to finance and coordinate the infrastructure.</p>
<p>Why plan so far into the future?</p>	<p>Brexit will likely affect the economy. Even if this causes a slowdown in the rate of house building</p>
<p>Has 'Brexit' been taken into account?</p>	

## GP2: Up-to-date status of the Local Plan

4 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	nationally this will only increase the pressure of housing need. The Government has stated as a national priority a significant boost in the supply of new housing which will not change as a result of Brexit. It should be noted that the housing sites put forward in the Housing Statement do not meet the full OAN, so any reduction in international migration is unlikely to mean the site allocations put forward are not needed.

### Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
Section 2	Redrafting of Section 2 to reflect the necessary changed approach following the Purbrook Appeal decision.	Update in circumstances following the Purbrook appeal decision.
Guiding Principle 2	Redrafting of Section 2 to reflect the necessary changed approach following the Purbrook Appeal decision.	In a recent appeal case, the Inspector concluded the Council does not have a five year supply and so the policies for the supply of housing (and two policies relating to employment, CS2 and DM3) are out of date. However he acknowledged that these policies still exist and are capable of attracting weight. Other parts of the plan therefore remain unaffected by this decision.

## GP3: HBC will continue to prioritise the development of brownfield land

27 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
A number of sites in Table 2 are contrary to Guiding Principle 3.	Urban areas, including the Borough's town centres, have been considered. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the <a href="#">Housing Constraints and Supply Analysis</a> . The Local Plan (Core Strategy) and Local Plan (Allocations) documents remain in place and identify brownfield sites for development, including large allocations in the town centres. Guiding Principle 3 confirms that previously developed sites will be considered positively. It is not possible, however, to meet the Borough's housing need on brownfield sites alone.
Brownfield sites have been dismissed for cost reasons.	As stated by Guiding Principle 3, the Council will continue to consider previously developed land (PDL) positively. This was demonstrated in the 2015 annual monitoring year, where 26% of the 513 gross housing completions were built on PDL.
More focus should be placed on the regeneration of Havant Town Centre i.e. East Street.	Policy CS6 (Regeneration of the Borough) in the Local Plan (Core Strategy) (2011) outlines the need for developments which positively contribute to the social, economic and/or physical regeneration of the whole Borough. The Policy specifically outlines focus on five areas of the Borough, including Havant Town Centre. Upon adoption of the Housing Statement, this policy will remain and will be reviewed through the Havant Borough Local Plan 2036.
Government figures, from 2015, show that Havant has almost 1000 vacant dwellings; why are these properties not being used rather than building new ones?	The recent Government figures outlined 985 vacant dwellings in Havant Borough in 2015. Nevertheless, of these 985, only 248 dwellings are considered as 'long-term vacant'; i.e. 6 months+ vacant, the rest being vacant due largely to market churn. The proportion of homes that are vacant is less than the south east and national average (as set out on p. 92 of the 2014 SHMA <sup>20</sup> ).

<sup>20</sup> [http://www.push.gov.uk/south\\_hampshire\\_shma\\_final\\_report\\_16.1.14\\_.pdf](http://www.push.gov.uk/south_hampshire_shma_final_report_16.1.14_.pdf)

## GP3: HBC will continue to prioritise the development of brownfield land

27 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	Please see table 615 in the following link: <a href="https://www.gov.uk/Government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants">https://www.gov.uk/Government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants</a>
The current proposals for new homes should not be considered until the empty properties in Havant Town Centre are used for housing and other brownfield sites too.	Urban areas, including Havant Town Centre have been considered. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> .  Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the <a href="#">Housing Constraints and Supply Analysis</a> . The Local Plan (Core Strategy) and Local Plan (Allocations) documents remain in place and identify brownfield sites for development, and Guiding Principle 3 confirms that previously developed sites will be considered positively. It is not possible, however, to meet the Borough's housing need on brownfield sites alone.
Has there been a survey undertaken on the number of empty properties and industrial units before building on greenfield sites?	With regard to empty industrial units, Local Authorities have limited power to intervene in relation to private land. The Council can only consider sites for development that are put forward willingly by the landowner and are confirmed to be available for development. From this, the Council must strike a balance between meeting the housing need and the need of employment space.
The Council should take an aggressive stance to identify derelict or non-performing industrial sites for the purpose of new housing.	It is not possible under national planning policy to prevent development coming forward on greenfield sites until empty properties and all brownfield sites have been exhausted.
Support for Guiding Principle 3 in order to reduce the loss of agricultural land and green space, and reduce impacts on ecology and nature conservation.	The Local Plan (Core Strategy) and Local Plan (Allocations) documents remain in place and identify brownfield sites for development. Guiding Principle 3 confirms that previously developed sites will be considered positively.
The NPPF encourages the effective use of land by re-using land that has been previously developed (PDL), i.e. Brownfield land. The Council should intensify their efforts to identify and promote the development on windfall sites.	As outlined in Guiding Principle 3, Havant Borough Council (HBC) will continue to promote the development of brownfield land. The amount of housing completions of previously developed land (PDL) can be found in Chapter 5 of the Council's Annual Monitoring Reports: <a href="http://www.havant.gov.uk/planning-and-environment/planning-policy/local-plan-core-strategy/annual-monitoring-reports">http://www.havant.gov.uk/planning-and-environment/planning-policy/local-plan-core-strategy/annual-monitoring-reports</a>  The 2015 monitoring year reported that 26% of the 513 housing completions were built on PDL.

## GP3: HBC will continue to prioritise the development of brownfield land

27 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>Whilst Paragraph 111 of the NPPF identifies that the development of brownfield sites should be 'encouraged', it does not say they should be prioritised. Wording of Guiding Principle 3 should be amended to reflect this.</p>	<p>Paragraph 111 of the NPPF states:</p> <p>" Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local Planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land".</p> <p>It is proposed to reword Guiding Principle 3 accordingly.</p>
<p>Supportive of the principle of re-using previously developed land. However, this should not be at the expense of developing otherwise sustainable and acceptable greenfield sites, in accordance with the presumption in favour of sustainable development.</p>	<p>As stated previously, the Council is aware the Borough's housing need can not be met through the development of brownfield sites alone. The Housing Statement therefore identifies sustainable and acceptable greenfield sites/urban extensions.</p>
<p>Densities should be maximised on greenfield as well as brownfield sites.</p>	<p>The National Planning Policy Framework (NPPF) states that Local Planning Authorities should set out their own approach to housing density to reflect local circumstances.</p> <p>As highlighted on page 61 of the Local Plan (Core Strategy); the density of new housing will depend on design and appropriateness to its location. As a guide, the following minimum density thresholds have been developed using the Havant Borough Townscape Landscape and Seascape Character Assessment and the levels of accessibility to a range of facilities:</p> <ul style="list-style-type: none"> <li>• High density – minimum of 60 dwellings per hectare.</li> <li>• Medium density – minimum of 45 dwellings per hectare.</li> <li>• Low density – up to 45 dwellings per hectare.</li> </ul> <p>Where the quality of design justifies it, much higher densities could be achievable. It is not intended that density requirements should be too prescriptive as it is often a difficult balance between maximising the use of the land and reflecting surrounding built character and the amenity of neighbouring residents. Therefore, this is best assessed through individual planning proposals</p>

## GP3: HBC will continue to prioritise the development of brownfield land

27 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	through the application process.
Key issues raised by statutory consultees	HBC response
<b>Highways England:</b>	
Highways England supports the maximising of brownfield sites with good transport links and hubs.	Noted.

### Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
Guiding Principle 3	Change 'prioritise' to 'promote'. Should also state at the beginning that the principle is 'in line with the NPPF'.	Paragraph 111 of the NPPF states that brownfield sites should be 'encouraged'.

## GP4: Principle of residential development on those sites identified in Table 2 and exception to Policies CS17 and AL2

21 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Object to cancellation of Policies AL2 and CS17 (includes petition with 1,087 signatures).	It is not proposed that Policies AL2 and CS17 be deleted. Rather it is proposed, through General Principle 4 in the Housing Statement, that the material consideration of housing need be sufficient to warrant a deviation from these policies on specific sites as they are considered suitable and able to deliver sustainable development to meet that high housing need and ensure a continuous supply of housing.
Havant Borough Council (HBC) have 'whitewashed' any justification for retaining these policies through their statement and risk an 'open book' for development in unsustainable countryside locations.	Paragraph S38 of The <a href="#">Local Plan Expert Group Report</a> states that 'The simplification of housing issues means that Local Plans should also engage with those matters of greatest concern to local communities including biodiversity, heritage, place making and quality of life'.
The cancellation/exception of Policies AL2 and CS17 are contrary to paragraph S38 of the Local Plan Expert Group Report (March 2016).	Addressing housing need is not something which can be ignored. If the Council does not continue positively planning for the future, the Government will take that role out of the Council's hands as their overarching aim is to get more homes built. The Council therefore considers the best way forward is to accept what cannot be changed: that there is a high housing need and that the National Planning Policy Framework (NPPF) requires local authorities to seek to meet that need. From this starting point, the Council can then focus on the detailed aspects, such as biodiversity, heritage, place making and quality of life, to make sure that the development that does take place is sustainable and well-integrated into local communities and provides the infrastructure that is needed to support it.
It is premature to suspend these policies based on projected population growth.	Housebuilding is one of the Government's top priorities, and the NPPF makes clear that Local Plans should meet the full Objectively Assessed Need (OAN) for their area. Even with all the sites put forward in the housing statement, the full OAN will not be met. The OAN is based on the best available evidence and was undertaken by an independent consultant.
GP4 should be put on hold until the outcomes of Brexit are known.	The OAN is based on the best evidence available at this moment in time. It is too early to anticipate future migration patterns, as the exact conditions of Britain's exit from the EU remain uncertain, and it is not feasible to delay the production of the Local Plan until further details emerge. In any case, it should be noted that the housing sites put forward for inclusion in the new Local Plan do not meet the full OAN, so any reduction in international migration is unlikely to mean the site allocations put forward are not needed.

## GP4: Principle of residential development on those sites identified in Table 2 and exception to Policies CS17 and AL2

21 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Havant Town Centre is in need of revitalisation and needs affordable housing at the centre. A revamped shopping centre and a better transport interchange are also needed.	Policy CS6 (Regeneration of the Borough) in the Local Plan (Core Strategy) (2011) outlines the need for developments which positively contribute to the social, economic and/or physical regeneration of the whole Borough. The Policy specifically outlines focus on five areas of the Borough, including Havant Town Centre. Upon adoption of the Housing Statement, this policy will remain and will be reviewed through the Havant Borough Local Plan 2036.
Support to the Council's approach to ensuring a five year housing land supply.	<p>Support noted. The Local Plan is being reviewed sooner than might have been anticipated because new evidence has emerged on the housing need for the area. The Council has lost an appeal against its refusal to permit a housing development. A key consideration as part of this appeal was whether the Council could demonstrate an up to date five year supply of deliverable sites against the requirement arising from the Borough's housing need.</p> <p>The Housing Statement forms an important initial stage in the Local Plan review as it identifies sites considered to be capable of delivering sustainable development to ensure the Council is taking a proactive approach to identifying deliverable sites sufficient to deliver five years' worth of housing. There does however remain an urgent need to review the Local Plan to retain some measure of control over local decision making.</p>
Greenfield urban extensions should be removed from Table 2 of the Housing Statement.	Urban areas have been considered. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the <a href="#">Housing Constraints and Supply Analysis</a> . The Core Strategy and Sites Allocations documents remain in place and identify brownfield sites for development, and Guiding Principle 3 confirms that previously developed sites will be considered positively. It is not possible, however, to meet the Borough's housing need on brownfield sites alone. Therefore, greenfield sites/urban extensions will be required to meet the housing need of the Borough.

**GP4: Principle of residential development on those sites identified in Table 2 and exception to Policies CS17 and AL2**

21 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
It is pointless to produce a new Local Plan if it can be easily amended each time (i.e. removal of Policies AL2 and CS17).	It is acknowledged that the Local Plan is being reviewed sooner than might have been anticipated. This has become necessary because new evidence has emerged on the housing need for the area. The Council has recently lost an appeal against its refusal to permit a housing development, which calls into question whether the Local Plan can be considered up to date. There is therefore an urgent need to review the Plan in order to retain some measure of control over local decision making.
The SHLAA is not a mechanism for determining what sites should be allocated.	The Council agrees with this statement. The SHLAA is the starting point in assembling information on available sites. Other evidence is required to determine which sites should be allocated. The full list of the evidence-base conducted at present can be found at <a href="http://www.havant.gov.uk/localplan/evidence-base">www.havant.gov.uk/localplan/evidence-base</a> .

**Proposed Modifications to the Housing Statement**

<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Paragraph 3.2 (As it is the introductory paragraph to the SHLAA).	A mention that the SHLAA is the starting point in assembling information on available sites. Other evidence is required to determine which sites should be allocated.	The SHLAA is not a mechanism for determining what sites should be allocated.

**GP5: Strategic Site - Campdown**  
29 responses were received regarding this topic

**Consultation Responses**

Key issues raised by residents and other stakeholders	HBC response
Support for identification of strategic sites generally.	Support noted.
Support for the identification of the site.	Support noted.
Comprehensive approach to site welcomed.	Support noted.
Large sites have complex land ownership issues – there should be no ‘in principle’ restriction on individual planning applications; parcels could be considered as separate allocations; development at Campdown could come forward earlier.	<p>Agree there are two distinct areas within the current site boundary. GP5 to be removed as a strategic site and divided into two separate allocations:</p> <ul style="list-style-type: none"> <li>• Land east of College Road (UE70)</li> <li>• Land north of Fort Purbrook (UE72)</li> </ul>
The boundaries as drawn mean there are two development areas in the strategic site that are not physically linked (the feasibility does show them connected for access).	
Development in the short term should be supported at Campdown, as it is for the sites identified under Guiding Principle 4: Table 2.	
Strategic sites are slow to come forward. The Council should continue to promote development on a wide range of sites continuous supply of housing land.	This is the aim of the Housing Statement.
Clarity is needed on the non-residential development requirements on the site.	Agree. The Housing Statement has a focus on residential capacity of sites. The Local Plan will contain further detail of other land uses.
Will set precedent for further development on the golf course; allocation should clarify protection of the golf course.	Green spaces are protected through Policies CS13 and DM1 of the Local Plan (Core Strategy). The Council’s approach to the protection of the Borough’s green spaces will be considered further through the Havant Borough Local Plan 2036. Through the split of the two development areas, the golf course will no longer be part of the wider proposed allocation.

**GP5: Strategic Site - Campdown**  
29 responses were received regarding this topic

**Consultation Responses**

Objection to the identification of the site; development of large greenfield sites is not suitable or sustainable.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. Any site specific issues and constraints that can be mitigated will be set out in the development requirements for each site allocation in the Local Plan, and developers will be expected to demonstrate how these can be addressed.
Gaps between settlements should be protected to maintain their distinctiveness.	The Council does not have a policy to protect gaps. However, development requirements on site layout will be included in the site allocation in the Local Plan to ensure that the development does not result in the coalescence of distinct settlements.
Support proposal for new sports facility.	Support noted.
Site has potential to meet needs of Havant Hockey Club and other sports.	Noted.
Concerns over drainage issues/flood risk on the site or affecting neighbouring properties.	<p>Flooding and drainage will be considered as proposals develop and it is expected that appropriate mitigation will be proposed in accordance with national and local flood risk policies. These require that development should not increase flood risk elsewhere.</p> <p>With regard to wider flood risk issues, the Planning Policy Team is working closely with the Eastern Solent Coastal Partnership and the Environment Agency to determine how future development will be affected by flood risk and what protection and mitigation measures can be put into place.</p>
Concerns over loss of trees, (ancient) woodland and/or green spaces/golf course <i>per se</i> and for their tourism/leisure/ recreation and health benefits.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. However, the Council is keen to ensure that where possible, trees are retained within new development, and high quality, new open space is incorporated within the design and the layout of new developments.
Access for walkers: impact on Wayfarer's long distance walk/ path on southern side of golf course; Access to properties from path on southern side of golf course should be retained.	The Council has specifically indicated the developable area of the site. This is some way from the Wayfarer's path on the southern side of the golf course.

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**Consultation Responses**

Understand that Mr Gauntlett left land for all to enjoy.	The George Gauntlett Trust supports the allocation.
Development could have significant impact on wildlife/ecology; wildlife corridor should be maintained.	It is acknowledged that development of the site will have an impact on wildlife. The Council is in ongoing discussions with bodies such as Natural England, the RSPB and the Hampshire and Isle of Wight Wildlife Trust to identify any key issues and ways in which impacts can be mitigated. More detail on these matters will also be required to support any planning application on the site, so that impacts and proposed mitigation measures can be considered in detail.
Development could have a negative effect on the largely rural character of the area, in particular special character of Portsdown Hill. This should be avoided.	The Council acknowledges that development will affect the character of the area. However, the Council is committed both to delivering further housing, as well as to ensuring that quality of life remains high.
Development could have significant effect on heritage assets, including Fort Purbrook; Neolithic Barrow and site Anglo-Saxon Cemetery north of Portsdown Hill Road. This should be avoided.	Impact on historic structures and their setting will be noted as a development constraint in the Local Plan allocation. The Council is liaising with its archaeological advisers to determine what archaeological investigations are needed prior to development.
Development will have significant effect on the already busy highway network in the area (strategic and local roads).	The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport, to assess and provide solutions to any capacity issues in the network.
Walking and cycling should be encouraged.	Agree. Information on how the Council encourages active travel can be found at <a href="http://www.havant.gov.uk/cycling/active-travel-study">www.havant.gov.uk/cycling/active-travel-study</a> .
Questions over likely/best access to the site, including considerations of road safety.	Access points to the site have not yet been determined. This will emerge as details of the layout are developed.
Development could lead to loss of privacy; buffer needed between existing and new development.	The Council acknowledges that development will affect the character of the area and could have an impact on existing residents. However, the Council is committed both to delivering further housing, as well as to ensuring that quality of life remains high. The design and layout of future development will be required to consider the privacy of existing residents.

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Development likely to cause light pollution.	Policy DM18 (Protecting New Development from Pollution) of the Local Plan (Allocations) seeks to minimise all kinds of pollution. This policy requirement will be reviewed through the Havant Borough Local Plan 2036. The Council, does however, acknowledge that development in undeveloped areas will always lead to additional light in the area at night time. However, modern street lighting is designed to minimise light pollution.
Development could affect property prices.	This is not a matter that the Local Plan can consider.
Doctors, health centres, hospitals and other health services are already strained. Development can only be supported with infrastructure improvements.	The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the Clinical Commissioning Group and the NHS to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.
Local schools are already strained. Development can only be supported with infrastructure improvements.	The Council is aware of residents' concerns regarding education provision. The Council is working closely with Hampshire County Council as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.
Other community services and facilities (leisure etc.) are already strained. Development can only be supported with infrastructure improvements.	An Infrastructure Delivery Plan will accompany the Local Plan and will review what infrastructure is needed to support the plan.  The Council will seek to ensure that high quality, new open spaces are provided as part of new developments. The Council also charges developers under the Community Infrastructure Levy, and uses funds to provide community infrastructure.  Through Local Plan policies, the Council seeks to protect community facilities wherever possible. It should be noted, however, that publicly run facilities are under severe budgetary pressures and all Councils are reviewing the viability of these services and facilities. In addition, many leisure facilities are private businesses, and the Council cannot force these to be set up or remain open. However, if opportunities do arise and the Council is able to help enable the provision of facilities the Council will assist where appropriate.
Infrastructure should be delivered before development takes place.	A key part of the drafting of the Local Plan is to identify the infrastructure needed to make

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	<p>the development of sites sustainable.</p> <p>Smaller items of infrastructure, which are needed to make a development work, will be funded by developers through legal agreements with the Council. These are generally delivered alongside the development, so they are operational when the development is occupied.</p> <p>In terms of strategic infrastructure, in a climate of extremely limited resources, forward funding of infrastructure is not always possible. However, having a plan in place will allow the Council to bid for funds for strategic infrastructure in order to bring these forward at the earliest opportunity.</p> <p>Throughout the Local Plan preparation process, the Council is also in continuous dialogue with the providers of infrastructure, such as utility companies, Hampshire County Council for highways and schools, and the NHS. It should be noted, however, that it is the responsibility of these bodies to bring forward the infrastructure they deem necessary to meet the needs of the population.</p>
<p>Social housing should not all be in one development area.</p>	<p>The Housing Statement does not imply that this is being suggested, and the Council agrees that a mixture of affordable and market housing evenly distributed throughout each site is preferable.</p>
<p>Questions employment prospects for new residents</p>	<p>As well as planning for housing, the Council, the Partnership for South Hampshire and the Solent Local Economic Partnership are working to attract employers to the sub-region and ensure land is available for employment floorspace. Some residents in new developments will work in the Borough and some in the wider sub region; some may be retired.</p>
<p>Site suitable for smaller homes than suggested in Gerald Eve report</p>	<p>The Gerald Eve Report, the Strategic Sites Financial Feasibility Study, does not seek to predetermine the mix of properties on the site. Rather it makes reasonable assumptions on likely mix of properties to test the viability of development.</p>
<p>Seriously concerned that the further proposed sites will lead to a direct loss of habitat functionally linked to the Special Protection Area (SPA). Due to scale of individual housing developments or proximity to SPA further mitigation measures may be required in addition to a per-dwelling contribution through the Solent Recreation Mitigation</p>	<p>The Council is committed to continuing engagement in the Solent Recreation Mitigation Project and the definitive mitigation strategy and to implement that strategy once it is approved. The Council is also committed to the Solent Waders and Brent Goose Strategy and is actively engaged in its review to ensure that decisions regarding habitat functionally linked to the SPA are made in the light of the most robust and up to date data.</p>

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Partnership Strategy.

It is acknowledged that the potential impact of development on wildlife needs to be considered. The Council is in ongoing discussions with bodies such as Natural England, the RSPB and the Hampshire and Isle of Wight Wildlife Trust to identify any key issues and ways in which impacts can be mitigated. More detail on these matters will also be required to support any planning application on the site, so that impacts and proposed mitigation measures can be considered in detail. The HRA and SA will need to demonstrate that there are workable and deliverable mitigation options available for the housing allocations put forward in the local plan.

Urgent need for better understanding of the network of sites supporting Brent Geese and waders and protect accordingly. Further work is required before the housing sites can be considered further.  
Southern part of Campdown site has recorded use by Brent Geese. Clarity is needed but its proposal for housing is inappropriate.

The Housing Statement will be updated to highlight where development is proposed on sites which have any likelihood of Brent Goose/wader use. The Habitats Regulations Assessment (HRA) should highlight menu of options and explore whether there is a mitigation option that can be accommodated within the site without harming site deliverability.

<b>Proposed Modifications to the Housing Statement</b>		
<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Para 3.15, 3.16, Page 11, Page 12, Page 13 (including diagram), Page 14 and Guiding Principle 5	Remove reference to Campdown as a strategic site; leaving the Area Between Denvilles and Emsworth being known as the only strategic site.	To recognise that there are two distinct areas within the current site boundary. GP5 to be removed as a strategic site and divided into two separate allocations: <ul style="list-style-type: none"> <li>• Land east of College Road (UE70)</li> <li>• Land north of Fort Purbrook (UE72)</li> </ul>
Annex A Section 2 site maps	To reference Sites UE70 and UE72 within the Waterlooville Section.	See above.
Local Plan	Highlight need for school places as development requirement.	To ensure school places are delivered.
Local Plan	Highlight in development requirements likely presence of clay and need to explore prior extraction within the developable area.	To ensure that minerals resources are not needlessly sterilised.
Local Plan	Highlight in development requirements presence of safeguarded waste site.	To ensure that mitigation can be included and development does not prejudice the safeguarded site.
Local Plan	Note in development requirements that site is situated within Groundwater Source Protection Zone 1Cs (SPZ 1Cs), located at depth beneath the Lambeth Group. Need to be aware of pollution pathway in the Havant & Bedhampton Springs and that SUDS schemes, foundation design and ground investigation information will need to be approved.	To ensure groundwater pollution is prevented.

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Objection to the identification of the site; development of large greenfield sites is not suitable or sustainable.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. Any site specific issues and constraints that can be mitigated will be set out in the development requirements in the site allocations in the Local Plan, and developers will be expected to demonstrate how these can be addressed.
Other sites/areas should be fully considered before this site is developed e.g. Regeneration of urban areas and brownfield sites; sites in other Boroughs with a greater choice of land.	<p>There is no overarching National or Regional Housing Plan. The Council works collaboratively with its neighbouring authorities through the Partnership for Urban South Hampshire (PUSH). The partners are committed to working together to address housing and other needs across the area (see also Guiding Principle 6 in the Housing Statement). The Council also works with its neighbouring authorities that are not in PUSH under the Duty to Cooperate.</p> <p>In terms of sites in Havant, background evidence has been published which shows that all areas in the Borough have been comprehensively assessed:  <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the Housing Constraints and Supply Analysis<sup>21</sup> .</p> <p>The Core Strategy and Allocations documents remain in place and identify brownfield sites for development, and Guiding Principle 3 confirms that previously developed sites will be considered positively. It is not possible, however, to meet the Borough's housing need on brownfield sites alone.</p>
Support for identification of strategic sites generally.	Support noted.

<sup>21</sup> <http://www.havant.gov.uk/local-plan-2036-housing-constraints-and-supply-analysis-pdf-127-mb>

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Support principle of proper planning of the area.	Support noted.
Support Charrette/masterplanning approach.	Support noted.
Support identification of strategic site.	Support noted.
Plans need more impact studies/evidence.	The Housing Statement is an interim statement, which sets out a direction of travel and forms the starting point for the Local Plan Review. This will be fully evidenced and formally examined before adoption.
Statement should acknowledge that there could be an opportunity for short term development sites to come forward within the proposed strategic sites (those not required to deliver infrastructure for wider site).	Do not agree. The Council is of the opinion that the site and its infrastructure needs must be tackled comprehensively to ensure the best outcomes. A Charrette-led masterplanning approach is planned which will allow residents and other stakeholders to have an input into the way the site might develop.
The number of dwellings proposed for the area/the site is too high (especially when considered with recent developments); unfair for one area to take such a huge amount of development.	The Council must assess housing needs and development sites across the Borough. Given the high level of need and the limited supply of available land, it is not possible to apportion development evenly between different parts of the Borough.  The capacity of the Denvilles - Emsworth Site has been professionally assessed through the <a href="#">Havant Strategic Developments Areas; Financial Feasibility Study</a> .
Accept need for homes in principle.	Support noted.
Area is already overcrowded.	It is acknowledged that South Hampshire is heavily populated. However, significant housing need remains. Provided development is well planned and supported by infrastructure, it is considered that there is further capacity for development.
Do not accept the need for further homes – questions over	The OAN is based on the best available evidence and was undertaken by an independent

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Objectively Assessed Need (OAN) work and Government Policy on house building.	consultant. Housebuilding is one of the Government's top priorities, and the NPPF makes clear that Local Plans should meet the full OAN for their area. Even with all the sites put forward in the Housing Statement, the full OAN will not be met.
The OAN figures were established before the EU referendum, and should be now be reviewed.	The OAN is based on the best evidence available at this moment in time. It is too early to anticipate future migration patterns, as the exact conditions of Britain's exit from the EU remain uncertain, and it is not feasible to delay the production of the Local Plan until further details emerge. In any case, it should be noted that the housing sites put forward for inclusion in the new Local Plan do not meet the full OAN, so any reduction in international migration is unlikely to mean the site allocations put forward are not needed.
The Council is too readily accepting further development in the Borough.	Addressing housing need is not something which can be ignored. If the Council does not continue positively planning for the future, the Government will take that role out of the Council's hands and their overarching aim is to get more homes built. The Council therefore considers the best way forward is to accept what cannot be changed: there is a high housing need and that the NPPF requires local authorities to seek to meet that need. From this starting point, the Council can then focus on the detailed aspects to make sure that the development that does take place is sustainable and well-integrated into local communities and provides the infrastructure that is needed to support it.
Plans should be delayed – Current Local plan is still fit for purpose, and HBC appear to be guessing future requirements.	New evidence has emerged on the housing need for the area, so there is a need to review the plan. The NPPF requires the Council to draw up plans over a long time horizon of 15 years or more, so as to consider future requirements
Gaps between settlements (Denvilles & Emsworth) should be protected to maintain their distinctiveness.	The Council does not have a policy to protect gaps. However, development requirements on site layout will be included in the site allocation in the Local Plan to ensure that the development does not result in the coalescence of distinct settlements.
PUSH Position Statement states importance of Gaps.	PUSH Position Statement S1 states that strategic countryside gaps between settlements

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities. This principle deals with gaps so significant that they are of sub-regional importance. The only gap specifically listed is the Meon Valley (Fareham Borough). The Council does not consider the site represents a gap of sub-regional importance. Development requirements on site layout will be included in the site allocation in the Local Plan to ensure that the development does not result in the coalescence of distinct settlements.
Allocation is contrary to Policy AL2/current/previous policy on development outside urban areas.	The identification of this site forms part of a review of the Local Plan, which will include a full review of all current policies.
This land should be designated as Green Belt.	National Planning Guidance on the Green Belt <sup>22</sup> is clear the extent of Green Belt across the country is already established, and that new designations should only be made in exceptional circumstances. It is extremely unlikely that the land in question would qualify.
Land is good quality agricultural land that should be protected.	The NPPF expects local planning authorities to seek to use areas of poorer quality land in preference to that of a higher quality, where significant development of agricultural land is demonstrated to be necessary. However a balance must be struck with the requirement to meet identified housing needs in the Borough. Some loss of higher quality land cannot therefore be avoided.
Area should be kept for sports provision.	It is unrealistic to expect all of the land in the strategic site to be allocated for sports provision. The Council, does, however, have an expectation that green infrastructure will be provided on the site and the extent and nature of this is one of the aspects to be

<sup>22</sup> <http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/9-protecting-green-belt-land/>

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	explored further through the proposed Charrette/masterplanning work.
Development is contrary to the Emsworth Design Statement, adopted by HBC.	Since no details of the development are yet available, it is too early to say whether or not it is contrary to the Emsworth Design Statement. A Neighbourhood Plan is being prepared for Emsworth which may or may not take forward or amend the contents of the design statement. It will be possible to take account of the principles in the Design Statement in the Charrette/masterplanning work. It should be noted, however, that the area covered by the Design Statement only covers part of the strategic site.
If site is to be developed and large gap is lost, there should be a substantial buffer/gap/planting between development and existing properties.	The Housing Statement acknowledges that 'the development will need to be laid out in such a way that there remains clear distinction between the settlements of Emsworth, Denvilles and Warblington after completion of the development'.
Concerns over loss of trees and open spaces <i>per se</i> and for quality of life/health/ leisure, recreation and tourism benefits.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. However, the Council is keen to ensure that where possible, trees are retained within new development, and high quality, new open space is incorporated within the design and the layout of new developments.
Development could have significant impact on wildlife/ecology - rich flora and fauna will be lost.	It is acknowledged that development of the site will have an impact on wildlife. The Council is in ongoing discussions with bodies such as Natural England, the RSPB and the Hampshire and Isle of Wight Wildlife Trust to identify any key issues and ways in which impacts can be mitigated. More detail on these matters will also be required to support any planning application on the site, so that impacts and proposed mitigation measures can be considered in detail.
Corridor to Chichester Harbour and the South Downs should be maintained.	
Proximity to and Impact on Warblington Meadows SSSI and the AONB appears to be disregarded.	The HRA and SA will need to demonstrate that there are workable and deliverable mitigation options available for the housing allocations put forward in the Local Plan.
Development could have a negative effect on the rural/semi-rural	It is acknowledged that the character of the area will change, given the proposed scale of

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
character of the area. Loss of semi-rural landscape cannot be replaced by open space in a development.	development.
High density development is not in keeping with the area.	The assessment of site capacity has assumed 35 dwellings per hectare on the site. This is not considered 'high density' development and is comparable to the density at the Copseys Nursery Fields site in Denvilles, and the development at Hampshire Farm.
Proposal will destroy local communities/erode village life and cause people to move away from the area.	The Council acknowledges that further development will affect the character of the area. However, the Council is committed both to delivering further housing, as well as to ensuring that quality of life remains high.
There should be requirements for sustainable design.	The Government has abolished the Code for Sustainable Homes and has severely limited Councils' ability to seek ambitious levels of sustainable construction. However, sustainable construction requirements have largely been subsumed under Part L of the Building Regulations.
Questions over likely/best access to the site, including considerations of road safety and increase in traffic on local roads and junctions.	Access points to the site have not yet been determined. This will emerge as details of the layout are developed.
Suggestions for specific improvements to the highway network (for safety and/or capacity).	Comments made regarding specific roads and junctions have been noted and will be considered further as the Local Plan is progressed. Any improvements deemed necessary will be set out in the development requirements for each site or considered as non-development related improvements.
Development could lead to a loss of privacy for existing residents.	The Council acknowledges that development will affect the character of the area and could have an impact on existing residents. However, the Council is committed both to delivering further housing, as well as to ensuring that quality of life remains high. The design and layout of future development will be required to consider the privacy of existing residents.
Development could lead to poorer quality of life for existing residents/prevent quiet enjoyment of property.	

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Concerns over increase in crime and anti-social behaviour.	If new developments are well designed and well integrated with existing communities there is no reason that crime and anti-social behaviour should increase.
People should be protected as well as wildlife.	Planning must balance the needs of people and wildlife.
Warblington Level Crossing is particularly affected by congestion and delays – improvements are urgently needed. Full bridge or pedestrian bridge suggested.	There is currently a funding shortfall for the Warblington Level Crossing. Other funding options are being explored; this includes a CIL bid, the outcome of which will be determined in February 2017.
Development will have significant effect on the already busy highway network in the area (strategic and local roads).	The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport to assess and provide solutions to any capacity issues in the network.
Concerns over emergency access.	
Proposed junction on the A27 will not solve congestions problems.	
Proposed junction on the A27 may relieve congestion in the area.	
Object to junction on the A27 on the basis of impact on the character of the area/increased traffic in the area.	
Proposed junction on the A27 could make the A27 dangerous and /or more congested.	
Suggestions for location of A27 Junction and/or route of link road.	
Public transport is inadequate – improvements to bus service, train service and train stations needed.	

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	service providers to ensure they are aware of proposed levels of development, and to seek to improve services and facilities.
Concerns over air quality/pollution/noise from increased traffic.	The Council will explore the issue for the Local Plan and work with Natural England on the results of modelling and any necessary avoidance and mitigation measures.
Doctors, health centres, hospitals and other health services are already strained. Development can only be supported with infrastructure improvements.	The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the Clinical Commissioning Group and the NHS to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.
Local schools are already strained. Development can only be supported with infrastructure improvements.	The Council is aware of residents' concerns regarding education provision. The Council is working closely with Hampshire County Council as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.
Other community services and facilities (leisure etc.) are already strained. Development can only be supported with infrastructure improvements.	<p>The Council will seek to ensure that high quality, new open spaces are provided as part of new developments. The Council also charges developers under the Community Infrastructure Levy, and uses funds to provide community infrastructure.</p> <p>Through Local Plan policies, the Council seeks to protect community facilities wherever possible. It should be noted, however, that publicly run facilities are under severe budgetary pressures and all Councils are reviewing the viability of these services. In addition, many leisure facilities are private businesses, and the Council cannot force these to be set up or remain open. However, if opportunities do arise and the Council is able to help enable the provision of facilities the Council will assist where appropriate.</p>
Important the development should include local shops, a pub etc.	The Housing Statement acknowledges that as well as housing, the development should

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Key issues raised by residents and other stakeholders	HBC response
	include a local centre.
Disagree with development requirement for local centre.	The Council considers it important that in large scale development, local facilities are provided, both as a focus for the community, and to avoid unnecessary trips by car.
Developers should pay for/provide the infrastructure needed.	Developers provide or pay for infrastructure through S106 Legal Agreements and/or the Community Infrastructure Levy.
Welcome mention of open space.	Support noted.
Infrastructure should be delivered before development takes place.	<p>A key part of the drafting of the Local Plan is to identify the infrastructure needed to make the development of sites sustainable.</p> <p>Smaller items of infrastructure, which are needed to make a development work, will be funded by developers through legal agreements with the Council. These are generally delivered alongside the development, so they are operational when the development is occupied.</p> <p>In terms of strategic infrastructure, in a climate of extremely limited resources, forward funding of infrastructure is not always possible. However, having a plan in place will allow the Council to bid for funds for strategic infrastructure in order to bring these forward at the earliest opportunity.</p> <p>Throughout the Local Plan preparation process, the Council is also in continuous dialogue with the providers of infrastructure, such as utility companies, Hampshire County Council for highways and schools, and the NHS. It should be noted, however, that it is the responsibility of these bodies to bring forward the infrastructure they deem necessary to meet the needs of the population.</p>
Development could affect water quality in Ems tributary and harbours.	The Environment Agency (EA) has raised no concerns which would prevent the strategic sites coming forward. Nevertheless, the Council will continue to consult the EA as plans

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	progress, to ensure that water quality is fully considered.
Concerns over issues/flood risk on the site or affecting neighbouring properties/capacity of the sewerage network.	<p>It is not expected that any part of the site which lies within Flood Zones 2 or 3 will be developed. Flooding and drainage will be considered as proposals develop and it is expected that appropriate mitigation will be proposed in accordance with national and local flood risk policies. These require that development should not increase flood risk elsewhere.</p> <p>With regard to wider flood risk issues, the Planning Policy Team is working closely with the Eastern Solent Coastal Partnership and the Environment Agency to determine how future development will be affected by flood risk.</p>
Provision/upgrade of utilities.	The Council is aware of the residents' concerns regarding utilities provision. Utility providers (water, gas, electricity) have a statutory obligation to provide services to new development. The Council works with these providers to ensure they are aware of proposed levels of development so that they can plan accordingly for new development.
Concerns over noise/dirt/traffic during construction phase.	It is accepted that there will be some disturbance during the construction phase. Details of measures to mitigate such impacts are generally secured by means of condition at the planning application stage. As such it is not considered a valid reason to prevent development from coming forward.
Unlikely that development will address affordability issues.	The Council is not in a position to control the prices developers demand for homes. The

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Key issues raised by residents and other stakeholders	HBC response
	Council can, however, try to improve the supply of new homes by identifying sites suitable for development. It can also seek a proportion of affordable homes <sup>23</sup> (Social rented, affordable rented and intermediate housing) in developments.
Affordable housing should be provided elsewhere.	There is a significant need for affordable homes in the Borough and they must therefore be considered in all new developments.
Development could affect property values.	This is not a matter which can be considered or addressed through the planning process.
Need for archaeological investigations – may be Roman or Bronze Age artefacts.	The Council is liaising with its archaeological advisers to determine what archaeological investigations are needed prior to development.
Development could affect heritage assets.	Impact on historic structures and their setting will be noted as a development constraint both during the masterplanning process and as part of the Local Plan allocation which will include identified development requirements.
Parkland setting of Southleigh Park House should be protected – landscape and historical assessments needed.	
40% of houses should meet needs of young families.	Given the nature of the sites and the characteristics of the Borough, most of the homes built are likely to be family sized homes. In recent years there has been a shift from smaller dwellings to family sized ones – see information contained within Annual Monitoring Report 2015 <sup>24</sup> .

<sup>23</sup> As defined by Annex 2: Glossary of the National Planning Policy Framework

<http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/annex-2-glossary/>

<sup>24</sup> <http://www.havant.gov.uk/sites/default/files/documents/AMR%202015%20Final.pdf>

## GP5: Strategic Site – Area between Denvilles and Emsworth

117 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Where will occupiers of new properties work?	As well as planning for housing, the Council, the Partnership for South Hampshire and the Solent Local Economic Partnership are working to attract employers to the sub-region and ensure land is available for employment floorspace. Some residents in new developments will work in the Borough and some in the wider sub-region; some may be retired.
Development of this area not expected when bought property.	Planning must respond to changing circumstances. There is now a requirement from the Government to plan for OAN of an area. This is necessitating a review of the current Local Plan, and a need to consider all sites again for their development potential.
New properties and site in general must have adequate parking.	The Core Strategy includes a policy on parking standards in new development (Policy DM14). <a href="#">A Parking Supplementary Planning Document (SPD)</a> was adopted on 27th July 2016. This policy requirement will be considered through the Havant Borough Local Plan 2036.
Increased/improved provision for cyclists.	New development is expected to make provision for infrastructure through CIL and site specific S106 obligations. If it is considered that there is a need for improvements to pavements/cycle routes associated with the development, these will be considered as part of the planning process.
Strategic sites are slow to come forward. The Council should continue to promote development on a wide range of sites to ensure a continuous supply of housing land.	The timescales of strategic sites are acknowledged. It is for this reason that a number of smaller urban extension sites have been identified for early release.
There should be a vote on including the site or not.	HBC elected Members will make the decision whether to include the site in the Local Plan or not, taking into account the background evidence and information, and the representations made by the local community and other stakeholders
Need confirmation that no Compulsory Purchase Orders will be	The Council considers that the site must be planned and developed comprehensively. While it is not anticipated that it will be necessary, the Council is willing to using CPO

## GP5: Strategic Site – Area between Denvilles and Emsworth

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### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
needed.	powers if necessary to bring about the comprehensive delivery of the site.
Will site be delivered in phases?	This is a large site, and it is therefore likely that it will be developed in phases. However, what is vital is that it is planned comprehensively, so that a coherent development emerges and infrastructure needs can be addressed.
Should include bungalows to meet needs of elderly and free up family homes.	The mix of housing that is developed is determined largely by market forces. However, the Core Strategy supports a mix of housing types, and specifically acknowledges the housing needs of the ageing population, and sets out what requirements will be made from developers to supply affordable housing. Housing mix will be considered as part of the development requirements for the allocation through the Havant Borough Local Plan 2036.
Key issues raised by statutory consultees	HBC response
<b>Highways England:</b>	
Support comprehensive approach to development.	Support noted.
Before principle of new junction can be agreed, should be early engagement to understand impact on A27 and wider SRN. Design Manual for Roads and Bridges (DMRB) standards required.	The Council has commissioned a Transport Assessment to assess further possible strategic highways infrastructure requirements, and will work with the Highway Authority and Highways England to consider which proposals offer the best solutions to traffic alleviation around the Borough.
<b>Historic England:</b>	
Site includes Grade II Listed 1 and 2 Eastleigh Road and setting of other listed buildings - should be respected in masterplan/brief. Consideration of listed Southleigh Park House/clock tower building.	Impact on historic structures will be noted as a development constraint both during the masterplanning process and in development requirements noted in the Local Plan allocation.

## GP5: Strategic Site – Area between Denvilles and Emsworth

117 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<b>Hampshire County Council:</b>	
Concerns over the capacity of the highway network. There is no evidence or supporting detail of how the development will link to the existing highway network and if the highway network can cope.	The Council has commissioned a Transport Assessment to assess further possible strategic highways infrastructure requirements, and will work with the Highway Authority and Highways England to consider which proposals offer the best solutions to traffic alleviation around the Borough.
Impact on/provision of community facilities & services. The site will require new primary school; site could generate around 500 primary children, so a school for up to 630 pupils will be sought (3ha of land of a regular size, free from encumbrances and flat).	It is noted that a school will be needed for this site. This has been taken into account in considering the viability of developing this site, and will be taken into consideration during masterplanning work.
Minerals Safeguarding: Site likely to be underlain by sand and gravel. Prospective developers should undertake a mineral assessment and explore opportunities to use the minerals. This should be highlighted in the plan.	Havant Borough Council will continue to work with Hampshire County Council and will continue to incorporate the policies of the Hampshire Minerals and Waste Plan (2013). The likely presence of sand and gravel, and the need for further investigation into whether prior extraction is feasible will be written into the development requirements for this site.
<b>Chichester District Council:</b>	
Welcome comprehensive approach	Support noted.
Recognise cross boundary issues: highway/transport issues, and request that Chichester District Council (CDC) are kept informed, particularly in respect of transport studies and assessments.	The Council will continue to share information and work with CDC as plans progress.
Wastewater issues - capacity at Thornham should be monitored and Chichester District Council would like to be kept informed of future work on wastewater.	

## GP5: Strategic Site – Area between Denvilles and Emsworth

117 responses were received regarding this topic

### Consultation Responses

#### Key issues raised by residents and other stakeholders

#### HBC response

#### Portsmouth Water PLC:

Situated within Groundwater Source Protection Zone 1Cs (SPZ 1Cs), located at depth beneath the Lambeth Group. If this is breached, this would open up a pollution pathway to the Havant & Bedhampton Springs.

Portsmouth Water has no objection in principle to development at site. However given the risk to abstraction from the Havant and Bedhampton Springs, request to be consulted at the outset of any associated planning application in the future. In particular, this concerns;

- Appropriate use of SUDS (no deep borehole infiltration; surface water drainage strategy to be submitted);
- Piling foundations (must not breach Lambeth Group formation; foundation design to be submitted);
- Contaminated land (ground investigation to be submitted).

To be noted in development requirements. Portsmouth Water and Environment Agency will be consulted on any planning application on the site.

<b>Proposed Modifications to the Housing Statement</b>		
<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Local Plan	Note consideration of impact on historic structures and their setting as a development requirement.	To ensure historic structures are not adversely affected by development.
Local Plan	Write likely presence of sand & gravel, and the need for further investigation into whether prior extraction is feasible into development requirements.	To ensure that minerals resources are not needlessly sterilised.
Local Plan	Note in development requirements that site is situated within Groundwater Source Protection Zone 1Cs (SPZ 1Cs), located at depth beneath the Lambeth Group. Need to be aware of pollution pathway in the Havant & Bedhampton Springs and that SUDS schemes, foundation design and ground investigation information will need to be approved.	To ensure groundwater pollution is prevented.

**GP6: Duty to Cooperate**  
9 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
The suggestion that the shortfall of 1,322 homes will need to be addressed by other authorities is optimistic and unachievable. The shortfall should be found within the Borough.	Havant Borough Council has been thorough in its search for sites to meet the objectively assessed need. It has left “no stone unturned” in identifying suitable housing sites. This is set out in more detail in the Housing Constraints and Supply Analysis. Therefore, it will not be possible to meet the shortfall within the Borough. In accordance with paragraph 178 of the NPPF, the Council will be working with other local authorities to help meet the shortfall.
In accordance with the NPPF, more dependence should be directed to the re-use of brownfield land in urban centres and windfall sites.	Urban areas, including Havant Town Centres have been considered. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the <a href="#">Housing Constraints and Supply Analysis</a> . The Local Plan (Core Strategy) and Local Plan (Allocations) documents remain in place and identify brownfield sites for development, and Guiding Principle 3 confirms that previously developed sites will be considered positively. It is not possible, however, to meet the Borough’s housing need on brownfield sites alone.
Havant Borough Council is pushing sites in unsustainable locations. The sites will promote out commuting, high levels of car ownership, contrary to the NPPF and current local plan policies.	There is a high housing need in Havant Borough and the NPPF requires local authorities to seek to meet that need. From this starting point, the Council has considered sites for residential development across the Borough. The sites identified in the Housing Statement are those which the Council considers can help meet this high housing need, through sustainable development. Having established the principle in the Housing Statement, the Council can then focus on the detailed aspects to make sure that the development which does take place is sustainable and well-integrated into local communities and provides the infrastructure that is needed to support it.
Concerns over ecology. Brent Geese will be displaced, contrary to the NPPF and damage to bat habitats would contravene EU directives.	Adopted local plan policy DM23 is in place to ensure that sites which are used by Brent Geese are protected from development, or that appropriate mitigation measures are put in place. Where species or habitats are protected through legislation, appropriate measures will be taken throughout the local plan and development management process, in accordance with that legislation.
There should be a more joined up approach with neighbouring Councils, particularly in respect of infrastructure.	The Council is proactively working with neighbouring authorities and within PUSH to ensure a joined up approach. Havant Borough Council continues to work with Hampshire County Council and the Solent LEP in respect of infrastructure delivery and remains committed to the objectives set out in the Infrastructure Memorandum of Understanding

	(June 2013) which was agreed by the local authorities in Hampshire.
The Council will need to work with neighbouring authorities to meet full OAN, particularly to address cross boundary strategic issues and unmet housing need.	The National Planning Policy Framework (NPPF) states in paragraph 159 that authorities must seek to meet the full objectively assessed need (OAN) for housing in their area and in paragraph 178, that "public bodies have a duty to cooperate on planning issues that cross administrative boundaries". Housing markets cross local authority boundaries and Havant Borough Council (HBC) falls under the wider Portsmouth HMA. HBC's membership of and work with PUSH contributes to discharging the duties in the NPPF. The Council also works closely with neighbouring authorities to the east, to address cross boundary issues such as transport and education, in Chichester District and West Sussex.
<b>Key issues raised by statutory consultees</b>	<b>HBC response</b>
<b>Portsmouth City Council:</b>	
The process of dealing with the identified shortfall of 1,322 dwellings is unclear given that no option for meeting with level of need within Havant Borough are put forward for consideration as part of this consultation.	Guiding Principle 6 makes clear that the Council is committed to working through the Partnership for Urban South Hampshire to address housing need across the housing market area, including in Portsmouth. This will continue as the plan is developed.
<b>Hampshire County Council:</b>	
Impact on/provision of community facilities & services - If sites cannot be found in neighbouring authorities and HBC has to find further sites to meet its need, another 420 primary places (2FE primary school) will be needed. HBC should engage with HCC at the earliest opportunity.	It is considered that all sites which are deliverable or developable under the definitions in the NPPF have been considered. However as the plan develops, HBC are committed to working closely with HCC to further investigate the likely educational requirements arising from the proposed new development.
<b>Chichester District Council:</b>	
Chichester District Local Plan Review will assess capacity for meeting any unmet housing needs from Havant Borough.	Noted. As well as working with PUSH, HBC are committed to working positively with Chichester District Council to assess the capacity to meet housing need.

## Sites at Long Copse Lane (UE39, UE50 and UE67)

119 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Concerns that Long Copse Lane and Hollybank Lane cannot take additional traffic (capacity and safety concerns). Access is narrow (single track), there are no footpaths, there are blind bends, poor street lighting, and are used as a walking route by school children, cyclists, dog walkers and equestrians.	The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport to assess and provide solutions to any capacity issues in the network.
Concern over capacity of the highway network in wider area (A259; A27 etc.).	The Council will continue to work with HCC as Highway Authority to consider local issues regarding access and road safety to inform the most appropriate means of access for the site. Any planning applications would also have to demonstrate that the site can be accessed satisfactorily and safely.
It will not be possible to alter the highways layout to accommodate the additional traffic. Alterations would further damage landscape.	Impacts on the landscape, as well as the impact on the amenity of existing residents will be considered further as part of that work. Detail will be presented to the Council and considered as part of any planning application.
<p>Questions over likely/best access to the sites, including considerations of road safety and increase in traffic on local roads and junctions.</p> <p>Suggest access to Long Copse sites from Emsworth Common Road would be preferable; and/or opening up Redlands Lane.</p> <p>Suggest that Redland House Site should be accessed via Long Copse Lane and not via Redlands Lane (unmade footpath); Footpath section of Redlands Lane should be protected from encroachment by cars - seeking confirmation that the concrete bollards at the entrance to the footpath are to remain.</p>	
Concern over road safety at already dangerous junctions at both ends of the lane.	
Construction of site would be impossible as large vehicles would not be able to negotiate the sharp bend.	Access arrangements during site construction will be considered as part of a Construction Management Plan as part of any planning application.

## Sites at Long Copse Lane (UE39, UE50 and UE67)

119 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Concerns over disruption during construction phase.	It is accepted that there is likely to be some disturbance during the construction phase. However, this is not considered a valid reason to prevent the principle of development coming forward. Access arrangements, time restrictions and other mitigation measures will be considered as part of a Construction Management Plan at the application stage.
Proposed quantum of development/densities too high for location.	Further assessments will have to be submitted as part of any planning application(s), including traffic and ecology, to determine the site's viability and the suitability for the number of homes.  As highlighted on page 61 of the Local Plan (Core Strategy) the density of new housing will depend on its design and appropriateness to its location. It is not intended that density requirements should be too prescriptive as it is often a difficult balance between maximising the use of the land and reflecting surrounding built character and the amenity of neighbouring residents. Therefore, this is best assessed for individual planning proposals through the application stage.
Number of dwellings proposed for the Redland House site (5) is too high for the site.	
Site is outside the urban areas identified in Adopted Local Plan and therefore contrary to current Policies CS17 and AL2.	In order to address the Borough's high housing need it is inevitable that all undeveloped areas that are free from significant constraints are considered for development. It is acknowledged that the site lies outside the urban area. Guiding Principle 4 in the Housing Statement proposes that existing policies regarding the urban area should not apply to the sites listed in Table 2 as these sites are considered to be capable of delivering sustainable development. As part of the review of the Local Plan, the urban boundary will have to be redrawn to include new allocation sites.
Sites are contrary to Guiding Principle 3 in the Housing Statement (which states that brownfield land will be prioritised).	Urban areas, including Havant Town Centres have been considered. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the <a href="#">Housing Constraints and Supply Analysis</a> . The Local Plan (Core Strategy) and Local Plan (Allocations) documents remain in place and identify brownfield sites for development. Guiding Principle 3 confirms that previously developed sites will be considered positively. It

## Sites at Long Copse Lane (UE39, UE50 and UE67)

119 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	is not possible, however, to meet the Borough's housing need on brownfield sites alone.
Contrary to current Local Plan – plan should not yet be reviewed.	It is acknowledged that the Local Plan is being reviewed sooner than might have been anticipated. This has become necessary because new evidence has emerged on the housing need for the area. The Council has recently lost an appeal against its refusal to permit a housing development, which calls into question whether the Local Plan can be considered up to date. There is therefore an urgent need to review the Plan in order to retain some measure of control over local decision making.
Support for identification of Redlands House Site – there are no constraints to delivery.	Support noted.
Development only acceptable up to Wraysbury Park Drive (accept UE39, but not UE50).	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints are considered for development. Developers will still have to demonstrate how each site can deliver an acceptable scheme in terms of design, layout, density, impact on the surrounding area, impact on ecology, transport and access and other material planning considerations.
Long Copse is one of two roads in the Borough that have been designated as roads of special rural character.	Long Copse Lane was designated as having special character in the Havant Borough District-Wide Local Plan 1996-2011. This plan has been superseded by the Local Plan (Core Strategy) and Local Plan (Allocations) documents where the designation was not carried forward.
Redlands Lane is part of the 'Ancient Sussex Border Path'.	Development would not remove the route.
Development of the site would set a precedent for more development along Long Copse Lane.	The Local Plan must be shown to be deliverable when examined by the Independent Planning Inspector. As a result, only land which the owners have indicated is available for development has been included. A great deal of Long Copse Lane is also in Chichester District.

## Sites at Long Copse Lane (UE39, UE50 and UE67)

119 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Negative impact on the (semi) rural character of the area - would be out of character with existing surroundings; impact on beautiful landscape.	It is acknowledged that the Havant Landscape Capacity Study finds that these sites are located within areas assessed as having low or medium low capacity to accept change. Encroachment of urban character into adjacent rural areas is identified <del>within</del> as a key issue, but it is important to acknowledge this analysis does not preclude development and is one consideration in the balance as to whether development should be supported, along with other considerations including housing need. Development may be deemed acceptable where mitigation could be provided for associated impacts on landscape character and ecology. These issues will be identified in the development requirements for the sites.
Objection to the site is supported by the Landscape Sensitivity and Capacity Study.	
Loss of semi-rural landscape cannot be replaced by open space in a development.	The Council accepts that formal open spaces provide a different experience from semi-rural landscape although developments on the urban fringe, such as at West of Waterlooville, include semi-rural open spaces such as meadows to provide a link to the rural areas beyond.
Object to loss of buffer between urban area and South Downs National Park.	These sites are within reasonable proximity of the South Downs National Park Boundary, but are not immediately adjacent to, nor considered visible from within the National Park.
Object to encroachment onto/impact on Hollybank Woods/ Southleigh Forest and Forest of Bere.	The sites do not encroach onto these areas. It is acknowledged that they are close to, but not within the boundary of, the designated Site of Importance to Nature Conservation (SINC) of Hollybank Woods.
Gaps between settlements should be protected to maintain their distinctiveness.	The Adopted Local Plan does not contain a specific gaps policy. However, development requirements on site layout will be included in the site allocation in the Local Plan to ensure that the development does not result in the coalescence of distinct settlements.
Concerns over loss of trees, woodland and green space <i>per se</i> and for their health and leisure/recreation benefits for people.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. However, the Council is keen to ensure that where possible, trees are retained within new

## Sites at Long Copse Lane (UE39, UE50 and UE67)

119 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	development and high quality, new open space is incorporated within the design and the layout of new developments.
Doctors, health centres, hospitals and other health services are already strained. Development can only be supported with infrastructure improvements.	The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the Clinical Commissioning Group and the NHS to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.
Local schools are already strained. Development can only be supported with infrastructure improvements.	The Council is aware of residents' concerns regarding education provision. The Council is working closely with Hampshire County Council as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.
Other community services and facilities (leisure, shops etc.) are already strained. Development can only be supported with infrastructure improvements.	<p>The Council will seek to ensure that high quality, new open spaces are provided as part of new developments. The Council also charges developers under the Community Infrastructure Levy, and uses funds to provide community infrastructure.</p> <p>Through local plan policies, the Council seeks to protect community facilities wherever possible. It should be noted, however, that publicly run facilities are under severe budgetary pressures and all Councils are reviewing the viability of these services. In addition, many leisure facilities are private businesses, and the Council cannot force these to be set up or remain open. However, if opportunities do arise and the Council is able to help enable the provision of facilities the Council will assist where appropriate.</p>
Development could have significant impact on wildlife/ecology - rich flora and fauna will be lost.	It is acknowledged that development of greenfield sites will have some impact on wildlife on the sites affected. The Council is having ongoing discussions with bodies such as Natural England, the RSPB and the Hampshire and Isle of Wight Wildlife Trust to identify any key issues and ways in which impacts can be mitigated. More detail on these matters

## Sites at Long Copse Lane (UE39, UE50 and UE67)

119 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	will also be required to support any planning application on the sites, so that impacts and proposed mitigation measures can be considered in detail.
Hedgerows and mature trees should be retained if site is developed.	The impact of development on hedgerows and trees will be considered at the application stage. A number of Tree Preservation Orders have been made in the area, and there is detailed legislation regarding the protection of hedgerows <sup>25</sup> .
Other sites should be developed – sites with less impact.	Urban areas, including Havant Town Centres have been considered. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the <a href="#">Housing Constraints and Supply Analysis</a> . The Local Plan (Core Strategy) and Local Plan (Allocations) documents remain in place and identify brownfield sites for development. Guiding Principle 3 confirms that previously developed sites will be considered positively. It is not possible, however, to meet the Borough's housing need on brownfield sites alone. A large amount of greenfield sites have also been considered. The NPPF is clear that housing need must be met unless it would be contrary to the NPPF to do so. It is not considered that there is justification under the NPPF for resisting the principle of development at Long Copse Lane.
Concerns over air quality/pollution/noise from increased traffic.	The Council will continue to explore this issue for the Havant Borough Local Plan 2036 and ensure any necessary avoidance and mitigation measures are included in the developer requirements.
Development will lead to poorer quality of life for existing	The Council acknowledges that further development will likely affect the character of the

<sup>25</sup> Hedgerow Regulations 1997

<https://www.gov.uk/Government/publications/hedgerows-retention-and-replacement-notices-the-appeal-procedures>

## Sites at Long Copse Lane (UE39, UE50 and UE67)

119 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
residents/prevent quiet enjoyment of property.	area. However, the Council is committed both to delivering further housing, as well as to ensuring that quality of life remains high.
Impact on Westbourne.	
Any new open space created would only benefit residents in the new development.	This assertion is not substantiated, since details of the nature or location of the open space are not yet available. It is true that developers are only required to make provision for infrastructure to serve their development, but generally this would not prevent other residents using the facility and the open space must be provided as public open space, not restricted to the residents of the development.
Need to consider Bechstein Bats.	HBC is collaborating in the development of a Bechstein's Bat Planning Protocol which will be published in 2017. This document will provide further information on the expected survey and mitigation requirements for developments where impacts are likely. This will be included in the development requirements in the Havant Borough Local Plan.
Need for homes should be balanced against NPPF para 109 'the planning system should contribute to and enhance the natural and local environment'.	Agreed - planning must balance the needs of people and wildlife. The accompanying Sustainability Appraisal <sup>26</sup> shows how sustainability considerations have been weighed up against each other.
There is poor public transport service in the area – residents in new development would have to drive	Half-hourly bus services are available from New Brighton Road, whilst Emsworth Railway Station, linking to Havant, Portsmouth and London is 1.5km to the south. Providing new development at a suitable density enables a market to form for public transport provision. This will continue to be explored through the full plan Transport Assessment and liaison with public transport providers. If appropriate, provision of public transport infrastructure,

<sup>26</sup> <https://www.havant.gov.uk/localplan/regulatory-requirements>

## Sites at Long Copse Lane (UE39, UE50 and UE67)

119 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	such as bus stops, will be included in the developer requirements for the site.
HBC's statement is that these sites are 'deliverable, developable, free from constraints and that sustainable development can be achieved'. However, the remoteness from meaningful services and inadequate highway infrastructure makes sustainability questionable.	It is acknowledged that town centre locations are more sustainable than greenfield sites, and the Council will continue to encourage and promote development in built up areas which are close to facilities. However, it is not possible to meet the Borough's housing need in urban areas alone, and the sites put forward through the housing statement are considered to meet the requirements of sustainable development under the NPPF.
Concerns over the impact on property values.	This is not a matter which can be considered or addressed through the planning process.
Emsworth has already seen a lot of development in recent times.	The Council accepts that a high level of development had taken place in the Borough in recent years. However, housing need remains high. The Council is committed both to delivering further housing, as well as to ensuring that quality of life remains high.
Complaints that Hampshire Farm Development has not delivered the community benefits that were promised.	The Hampshire Farm development has provided a great deal of onsite infrastructure including extensive open space and allotments as well as over £1 million in contributions towards offsite infrastructure. Discussions are continuing regarding the community provision element of the promised benefits to ensure its delivery.
Concerns over drainage issues/flood risk on site, on access to site and affecting neighbouring properties/capacity of the sewerage network.	Flooding and drainage will be considered as proposals develop and it is expected that appropriate mitigation will be proposed in accordance with national and local flood risk policies. These require that development should not increase flood risk elsewhere. The Council will continue to consult the Environment Agency regarding flood risk on the site.
Accept need for new homes on principle.	Noted.
Plan alleviates requirements of future migrants at expense of existing residents and natural beauty and attractions of local areas.	The Strategic Housing Market Assessment takes into account a number of factors in determining housing need, including household formation, economic growth and population change. In terms of population change, both migration (within the UK and

## Sites at Long Copse Lane (UE39, UE50 and UE67)

119 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	international) and natural change (births minus deaths) are considered, and the figures do show a high level of past trends in population change due to migration into the area. The objectively assessed need that Councils are required to address is informed by both types of population change, and it is not possible to plan only for the needs of the population of the Borough. It should be noted that the Council cannot control who buys property in the area. It is likely that on any development, it will be a mixture of people from within and from outside the Borough.
The area is at the top of a hill and is thus not suitable for those with limited mobility.	It is up to individual potential occupiers to assess whether the area is suitable for them.
At the other end of Long Copse Lane, West Sussex has been recently subject to a planning decision which found in favour of a much reduced housing density. It would seem inappropriate to polarise the West Sussex and Hampshire ends of the same lane through a disjointed and insular approach.	While Councils do co-operate on cross boundary issues, it is up to each individual authority to determine the appropriateness of development in their area, through the plan making and decision making processes.
Support identification of site, and general approach taken to Housing Statement.	Support noted.
Site UE39 is available, deliverable and developable with no legal constraints to development.	Support noted.
UE50 and adjoining land can deliver housing relatively quickly - SHLAA states developable but not deliverable - not the case as there are no major obstacles.	Support noted.
Objection to omission of additional land from UE50. Inclusion of land between UE50 and UE39 would remove gap, provide	The area to the north of Long Copse Lane was identified in the sieving process that is described in the Housing Constraints and Supply Analysis (July 2016) as an area with

## Sites at Long Copse Lane (UE39, UE50 and UE67)

119 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
comprehensive site and be Green Infrastructure led.	potential for development being without significant environmental constraints. During the 'Call for Sites' land was put forward in separate parcels so that a comprehensive approach to site identification was not possible in the Draft Local Plan Housing Statement. That additional land has since been put forward in responses to the publication of the Draft Local Plan Housing Statement which extend and fill gaps between the sites. This would enable a comprehensive approach and assist with resolving such as access issues to the overall area.
Questions over validity of PUSH OAN work.	The OAN is based on the best available evidence and was undertaken by an independent consultant using a nationally prescribed methodology.
Selection process has not been subject to rigorous testing and would fail the tests of soundness at examination.	HBC considers that it has comprehensively assessed the development potential for housing of sites in the Borough. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the <a href="#">Housing Constraints and Supply Analysis</a>  Paragraphs 1.6 and 1.7 explain that the Housing Statement forms the first formal step in the Local Plan preparation process. The Housing Statement sets out a direction of travel and forms the starting point for the Local Plan review, which will be fully evidenced and formally examined before adoption.
Hollybank House is important listed building - development here would severely compromise its setting.	It will be noted in the development requirements for the site. Applicant will have to demonstrate how the setting of the listed building has been considered, and that development does not cause substantial harm.
Loss of agricultural land - high quality.	The NPPF expects local planning authorities to seek to use areas of poorer quality land in preference to that of a higher quality, where significant development of agricultural land is demonstrated to be necessary. However a balance must be struck with the requirement to meet identified housing needs in the Borough. Some loss of higher quality land cannot

## Sites at Long Copse Lane (UE39, UE50 and UE67)

119 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	therefore be avoided.
Key issues raised by statutory consultees	HBC response
<b>Chichester District Council:</b>	
SHLAA contains no visual assessment.	Background evidence has been published on site constraints in a combination of the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> , the <a href="#">Housing Constraints and Supply Analysis</a> and the <a href="#">Landscape Capacity Study</a> .
Should be aware of ancient woodland in Chichester District.	The presence of ancient woodland near the site will be noted in the development requirements for the site.
<b>Historic England:</b>	
Should consider setting of Grade II Listed Hollybank House.	It will be noted in the development requirements for the site. The applicant will have to demonstrate how the setting of the listed building has been considered, and impact minimised in line with regulatory requirements and the NPPF.

**Proposed Modifications to the Housing Statement**

<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Local Plan	Note Grade II Listed Building Hollybank House near UE50 and UE39 in development requirements.	To ensure that the setting of the listed building is fully considered and to ensure that development does not cause substantial harm.
Local Plan	Note presence of ancient woodland near the site in the development requirements for the site.	To ensure impacts on woodland can be properly considered.
Local Plan	Note that landscape character and ecology impacts must be mitigated.	To ensure development does not cause significant adverse visual or ecological impact on the landscape.

## UE02b: Land north and west of Selangor Avenue

Planning Application – APP/16/00774

17 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>The site formed part of the strategic gap in 2007 and was outlined in the Havant Gaps Review 2012 as not suitable for development. The proposed site was dismissed previously at a Public Inquiry due to the adverse effects on the strategic gap.</p>	<p>Havant Borough Council (HBC) is aware that UE02b Selangor Avenue was “not recommended for development” in the Havant Gaps Review (2012). The 2012 Review was informed by previous Landscape Character Assessment work. The high landscape value was based on the locally important landscape features and particularly for the contribution to physical separation between the adjacent urban areas of Havant and Emsworth. Nevertheless, there has been a change in central Government policy towards housing; this is driving the development of sites not previously considered appropriate, as there is now a higher housing target with limited sites available for development.</p> <p>With this, decisions for development in greenfield/urban extension sites will now be considered in accordance with Guiding Principle 4.</p>
<p>Development of this site goes against Policies AL2 and CS17.</p>	<p>Guiding Principle 4 in the Housing Statement proposes that Policies CS17 and AL2 should not apply to this site, as this site is considered to be capable of delivering sustainable development.</p>
<p>Concern is raised over the proximity of the development to the high pressure gas main and the 24 hour access requirement for it. Barratt’s plan will not be adequate as the gas main cannot run underneath properties and to move the gas main would not be economically viable.</p>	<p>The Council is aware of the concerns residents have raised regarding the provision of utilities. Utility providers (water, gas, electricity) have a statutory obligation to provide services to new development. The Council works with these providers to ensure they are aware of proposed levels of development so that they can plan for new development accordingly.</p> <p>Discussions are ongoing between the developer and the relevant authorities regarding the gas main.</p>
<p>Existing sewage utilities are working at full stretch; heavy rainfall exacerbates the problem and causes sewage to be pumped into Chichester Harbour several times a year.</p>	<p>Southern Water has been consulted on all the proposals in the Housing Statement. No objections have been raised. A development requirement for connection to the sewerage system at the nearest point of adequate capacity may be required.</p>
<p>Congestion will increase further on the A259, Selangor Avenue,</p>	<p>The comments made regarding specific roads and junctions have been noted. As an</p>

## UE02b: Land north and west of Selangor Avenue

Planning Application – APP/16/00774

17 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Victoria Road and increase the tailback from the Southleigh Road level crossing.	application has been submitted to the Council for this site, consultation with the County Council as Highway Authority and Highways England has commenced. This will inform whether any changes are required to the scheme which has been submitted.
The additional traffic feeding onto Havant Road and limited vision from parked vehicles will cause danger to cyclists and vehicles.	
The site acts as a noise buffer between the A27 and Selangor Avenue.	A noise report has been submitted with the planning application and the Council's Environmental Health Team have been consulted.
The proposed A27 Junction will not alleviate congestion.	The Council will continue to support a new junction from the A27, unless evidence arises that this is not feasible. It is considered that the proposed junction is essential in unlocking the development potential of the wider strategic site to the north of the A27 but is likely to have benefit to those living close by as well. The Council has commissioned a full plan Transport Assessment to assess further possible strategic highways infrastructure requirements, and will work with the Highway Authority and Highways England to consider which proposals offer the best solutions to traffic alleviation around the Borough.
The proposed A27 junction should be in place before development takes place.	<p>The Council has commissioned a Transport Assessment to assess further possible strategic highways infrastructure requirements, and will work with the Highway Authority and Highways England to consider which proposals offer the best solutions to traffic alleviation around the Borough.</p> <p>In terms of strategic infrastructure, in a climate of extremely limited resources, forward funding of infrastructure is not always possible. However, having a Plan in place will allow the Council to bid for funds for strategic infrastructure in order to bring these forward at the earliest opportunity.</p> <p>The proposed A27 Junction will be situated in the 'Area between the Denvilles and Emsworth' Strategic Site and is therefore subject to the development of that site. Due to the size of this proposed allocation, it is likely that the housing proposed on the site will</p>

## UE02b: Land north and west of Selangor Avenue

Planning Application – APP/16/00774

17 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	come forward in phases.
Accept need for homes in principle.	Comment noted.
Support affordable housing.	New development is expected to provide between 30% and 40% affordable housing. This can be in a variety of formats and will usually be determined in accordance with the Council's Housing Service and with affordable housing providers.
Oppose affordable housing.	The Council is not in a position to control the prices developers demand for homes. The Council can, however, try to improve the supply of new homes by identifying sites suitable for development. It can also seek a proportion of affordable homes (Social rented, affordable rented and intermediate housing) in developments.
The proposed development will put a strain on school places.	The Council is aware of residents' concerns regarding education provision. The Council is working closely with Hampshire County Council as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.
The proposed development will put a strain on the capacity of GP surgeries, hospitals and the ability of emergency services.	The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the South East Hampshire Clinical Commissioning Group to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.
The current infrastructure is inadequate for the current population due to past developments.	A key part of the drafting of the Local Plan is to identify the infrastructure improvements/additions required to make proposed sites sustainable.

## UE02b: Land north and west of Selangor Avenue

Planning Application – APP/16/00774

17 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	<p>In terms of strategic infrastructure, in a climate of extremely limited resources, forward funding of infrastructure is not always possible. However, having a plan in place will allow the Council to bid for funds for strategic infrastructure in order to bring these forward at the earliest opportunity.</p> <p>Smaller items of infrastructure, which are needed to make a development work, will be funded by developers through legal agreements with the Council. These are generally delivered alongside the development, so they are operational when the development is occupied.</p>
<p>Infrastructure must be delivered before development.</p> <p>This will help secure adequate public transport and ensure employment from local industries and job providers.</p>	<p>Throughout the Local Plan preparation process, the Council is also in continuous dialogue with the providers of infrastructure, such as utility companies and public transport providers, HCC for highways and schools, and the NHS. It should be noted, however, that it is the responsibility of these bodies to bring forward the infrastructure they deem necessary to meet the needs of the population.</p> <p>With regard to public transport; the Council is aware of the concerns residents have raised regarding the provision of public transport. The Council does not itself provide public transport services, but liaises with rails and bus service providers to ensure they are aware of proposed levels of development, and to seek to improve services and facilities.</p>
Loss of greenspace	<p>In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. However, the Council is keen to ensure that where possible, high quality, new open space is incorporated within the design and the layout of new developments.</p>
<p>The area has an abundance of wildlife and is apart of a nature conservation area and green corridor, which connects Chichester Harbour with Southleigh, Stansted Forest and the South Down National Park; it is thus essential to green infrastructure.</p>	<p>No overriding issues have been identified that would prevent allocation from coming forward.</p> <p>It is acknowledged that development of greenfield sites will have some impact on wildlife on the sites affected. The Council is having ongoing discussions with bodies such as</p>

## UE02b: Land north and west of Selangor Avenue

Planning Application – APP/16/00774

17 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	<p>Natural England, the RSPB and the Hampshire and Isle of Wight Wildlife Trust to identify any key issues and ways in which impacts can be mitigated.</p> <p>More detail on these matters will also be required to support any planning application on the sites, so that impacts and proposed mitigation measures can be considered in detail.</p>
Impact on AONB.	The design and layout of future development will be required to consider the visual impact on the AONB and will need to be assessed as part of the developer's considerations.
Loss of agricultural land.	The NPPF expects Local Planning authorities to seek to use areas of poorer quality land in preference to that of a higher quality, where significant development of agricultural land is demonstrated to be necessary. However, a balance must be struck with the requirement to meet identified housing needs in the Borough. Some loss of higher quality land cannot therefore be avoided.
Selangor Avenue is situated on a floodplain and is built upon clay soil. There is a need for flood alleviation infrastructure, otherwise the situation will worsen or be passed on to other areas.	The Environment Agency (EA) has no objection to the proposed development as it is not located within Flood Zones 2 or 3, and does not affect the designated main river. Nevertheless, the EA welcome the change in the proposed surface water drainage system which no longer includes the diversion of the designated main river through the proposed development site. With this, further information/clarification on proposed infiltration techniques and allowances for climate change, in regard to surface water drainage, are required and ongoing discussions are taking place.
The development of the site should be suspended until a 'bigger picture' is made clear.	New evidence has emerged on the housing need for the area, so there is a need to review the plan. The NPPF requires the Council to draw up plans over a long time horizon of 15 years or more, so as to consider future requirements.
Development will destroy the Emsworth identity and community, as	The Council acknowledges that further development will likely affect the character of the

## UE02b: Land north and west of Selangor Avenue

Planning Application – APP/16/00774

17 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
the village will become a suburb/sprawl of Havant.	area. However, the Council is committed both to delivering further housing, as well as to ensuring that quality of life remains high and that community identity remains.
Development should be in keeping with the area; new developments of 2-3 storey housing are out of character in an area of bungalows.	Policy CS9 of the Core Strategy (2011) refers to housing developments and the need to be in keeping with the character of the area. This policy will remain upon the adoption of the Housing Statement.
Number of dwellings for the area is too high.	<p>The National Planning Policy Framework (NPPF) states that Local Planning Authorities should set out their own approach to housing density to reflect local circumstances.</p> <p>As highlighted on page 61 of the Core Strategy (2011); the density of new housing will depend on design and appropriateness to its location. As a guide, the following minimum density thresholds have been developed using the Havant Borough Townscape Landscape and Seascape Character Assessment and the levels of accessibility to a range of facilities:</p> <ul style="list-style-type: none"> <li>• High density – minimum of 60 dwellings per hectare.</li> <li>• Medium density – minimum of 45 dwellings per hectare.</li> <li>• Low density – up to 45 dwellings per hectare.</li> </ul> <p>Where the quality of design justifies it, much higher densities could be achievable. It is not intended that density requirements should be too prescriptive as it is often a difficult balance between maximising the use of the land and reflecting surrounding built character and the amenity of neighbouring residents. Therefore, this is best assessed through individual planning proposals through the application process.</p>
Light, privacy and outlook of current residents will be lost.	The planning process is not able to protect views, however, the design and layout of future development will be required to consider the amenity of existing residents.

## UE02b: Land north and west of Selangor Avenue

Planning Application – APP/16/00774

17 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Current residents are concerned about employment opportunities for new residents.	<p>The Council recognises that a balance between housing provision and employment need must be retained.</p> <p>The current development at Dunsbury Hill hopes to create around 3,000 jobs for the Borough.</p>
Concerns over impact on property prices.	This is not a matter which can be considered or addressed through the planning process.
Strategic Site 2 'Area between Denvilles and Emsworth' should be developed in preference to this site.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development.
The developer has supported the site as a higher number of dwellings will go further to meet the OAN and address the Borough's shortfall. They have supplied a plan for vehicle, pedestrian and cycle route/access. Please see planning application APP/16/00774.	The Council received the planning application on Wednesday 27 <sup>th</sup> July 2016 and the application was validated on 1 <sup>st</sup> August. The application is currently going through the standard development management process.
Key issues raised by statutory consultees	HBC response
<b>Hampshire County Council:</b>	
In regard to mineral safeguarding, HCC believe the site is likely to be overlain by sand, gravel and clay. Therefore, prospective developers should undertake a mineral assessment and explore opportunities to use the minerals.	<p>HBC will continue to work with Hampshire County Council and will continue to incorporate the policies underlain in the Hampshire Minerals and Waste Plan (2013).</p> <p>Prior extraction of minerals to avoid sterilisation by development is not always feasible or practicable and it is acknowledged that investigation may be required at individual site level before development proceeds to determine whether it is appropriate for prior extraction or if the merits of development outweigh the safeguarding.</p>

<b>Proposed Modifications to the Housing Statement</b>		
<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Local Plan	Highlight in development requirements likely presence of sand, gravel and clay and need to explore prior extraction within the developable area.	To ensure that minerals resources are not needlessly sterilised.

## UE28: Littlepark House

9 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
The allocation for 47 houses is not economically viable. The Council should consider a wider area for development.	There has not been sufficient evidence submitted that residential development is suitable across the wider area of the site. The remaining area is covered by Tree Preservation Orders (TPOs) and designated as a Site of Importance for Nature Conservation (SINC). The number of dwellings is based on a density of 35 dwellings per hectare, which is considered appropriate for this location. The full extent of the site will be further considered as part of the preparation of the new Local Plan.
Concerns over the access to the site via narrow roads (e.g. Oakwood Avenue). The site should be extended to Scratchface Lane to allow for better access.	The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport, to assess and provide solutions to any capacity issues in the network.  At this stage, it has not been demonstrated that the site can be extended south to allow access onto Scratchface Lane, given TPO and SINC constraints.
Concerns over the impact on trees (TPOs) and wildlife.	The Council recognises TPO and SINC designations in the vicinity of the site and as such, does not propose to extend the developable site into the surrounding woodland at this time.
Residents in the area experience flooding to their properties and are concerned that this will increase following development.	The site lies within Flood Zone 1. Any site specific issues will be addressed through the planning application process.
A decision was made to not allocate the site in the previous Havant Borough Local Plan (Allocations).	The change in national policy following the adoption of the NPPF means that the Council is required to identify more sites for housing. This has initiated a review of the Adopted Local Plan and those which are now proposed for residential development are considered to be in accordance with the NPPF.

**Proposed Modifications to the Housing Statement**

<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
N/A	None.	It is not proposed to extend the site at this stage as there is insufficient evidence to show that this can be achieved given the constraints on the site.

## UE30: Land south of Lower Road Bedhampton

126 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Support for Council's approach to ensuring a five year supply of housing land and inclusion of site for 50 dwellings.	Support of developer noted.
Need called into question by Brexit: likely to reduce immigration; housing needs and permissions should be put on hold until Brexit effects considered.	The OAN is based on the best evidence available at this moment in time. It is too early to anticipate future migration patterns, as the exact conditions of Britain's exit from the EU remain uncertain, and it is not feasible to delay the production of the Local Plan until further details emerge. In any case, the housing sites put forward in the Housing Statement do not meet the full OAN, so any reduction in international migration is unlikely to mean the site allocations put forward are not needed.
Reference to previous proposals for 250 dwellings, reduced to 50 dwellings. Site was previously considered suitable by HBC for no more than 15 dwellings. Not demonstrated, apart from Government directive to build more houses, how situation has changed.	Previous editions of the SHLAA included the land south of Lower Road (a larger area) as 'developable' with a capacity for 250 dwellings but indicated that access through the conservation area could limit large scale residential development. The Local Plan (Allocations) included the site as an allocation but as a frontage development for only 15 dwellings to the east of Manor Farm. The omission from the final Plan was supported by the Inspector's Report following examination.
Site previously rejected as unfeasible for housing development. Residents unhappy as 'they have fought these proposals before'. Site was previously discounted as unsuitable and residents promised recently would not be developed.	That situation has changed as the Council is now planning for the next period up to 2036 and following the adoption of the NPPF, it is necessary to meet the full need for housing. The current plan has a time horizon to 2026 with housing targets that were set in 2010; however, national planning policy expects local plans to have a 15-year time horizon. The Council has a duty to keep the policies of the Local Plan, and the evidence upon which they are based, under review and up to date. This includes those that make provision for housing to meet future needs. Regardless of the time horizon of the plan, failure to identify and maintain a continuous five year supply of housing land will make the Borough vulnerable to planning applications and decisions to grant permission being taken out of the hands of the Council.
Accept need for new homes in principle but this area is not suitable	While some of the other locations being considered for future development may be more suitable they can not cater for the level of housing need that is expected to arise within the

## UE30: Land south of Lower Road Bedhampton

126 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>for the proposed development.</p> <p>There are other more suitable, less sensitive, locations.</p>	<p>Borough over the period to 2036.</p>
<p>Why was the decision made not to build houses where Wickes and Aldi are located, but instead to allow a retail park?</p>	<p>The Wickes and Aldi developments lie within the area of the defined Havant Town Centre. While residential development can take place in town centres, often in mixed use schemes on upper floors, national planning policy expects local planning authorities to promote competitive town centres that provide customer choice and a diverse retail offer.</p>
<p>Recently there was an application for 8 houses in Lower Road which was rejected by the Council and the decision upheld at appeal.</p>	<p>The Council does not have a record of such an appeal decision in the Bedhampton area. The respondent may be referring to the previous Local Plan examination and Inspector's report following the examination of the plan and consideration of the land south of Lower Road as an omission from that edition of the plan.</p>
<p>Concerns over quality of life and residential amenity for reasons below. How will we be compensated?</p>	<p>The Council acknowledges that further development will affect the character of the area. However, the Council is committed both to delivering further housing, as well as ensuring that quality of life remains high. The views from some properties on Lower Road will be affected by the development of this site. The planning process is not able to protect views. However, the design and layout of future development will be required to consider the amenity of existing residents. By taking a proactive approach to planning future development there is a much greater chance that measures to ameliorate the effects of development can be negotiated to the benefit of both existing and future residents.</p>
<p>Alternative brownfield sites not identified. Other areas should be developed e.g. Regeneration opportunities in Leigh Park.</p>	<p>Opportunities within the urban areas have already been considered and significant brownfield development is being planned for. The Core Strategy and Allocation documents remain in place and identify brownfield sites for development including at Leigh Park.</p>

## UE30: Land south of Lower Road Bedhampton

126 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant is the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the Housing Constraints and Supply Analysis <sup>27</sup> however new opportunities for brownfield sites are very limited. Guiding Principle 3 of the LPHS confirms that previously developed sites will be considered positively. It is not possible, however, to meet the Borough's housing need on brownfield sites alone.
Development is contrary to Local Plan Policy AL2.	Due to the significant scale of future housing needs within the Borough these cannot be accommodated within the existing settlement boundaries therefore it will be necessary to review and redraw the boundaries of Policy AL2 to include additional site allocations.
Concerns over capacity of highway network and the cumulative effect of recent developments in Bedhampton (Hawthorne Mews & One Eight Zero) and the proposed development at Forty Acres. In particular the Rusty Cutter Roundabout, Bedhampton Hill, B2177 and Belmont Roundabout at top of Brookside Road; and further away the (A3(M), M27, A27 feeds and Harts Farm Way, are already congested particularly in rush hour.	The NPPF states that: 'Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.'  The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, including the cumulative effects of other development proposals, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport to assess and provide solutions to any capacity issues in the network. The Council continues to promote travel by modes other than the private car and through developments is seeking the means to improve cycling facilities and the network.
Extra 100 vehicles will increase difficulties turning into/out of Brookside Road. Brookside Road is used by visitors to Bidbury Mead Recreation Ground. Would need to reconfigure Belmont	Comments made regarding specific roads and junctions have been noted, solutions are being investigated and will be considered further as the Local Plan is progressed.

<sup>27</sup> <http://www.havant.gov.uk/local-plan-2036-housing-constraints-and-supply-analysis-pdf-127-mb>

## UE30: Land south of Lower Road Bedhampton

126 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>Roundabout. No proposals put forward to address this impact. Lower Road is a Category D road. Kings Croft Lane is a single track road.</p>	
<p>Consider access onto Rusty Cutter Roundabout. Lower Road should be blocked to the east of the junction with Lodge Road and opened onto the Rusty Cutter Roundabout. Development needs a new primary access (same way as for Nursery Road development).</p>	<p>The Rusty Cutter Roundabout was altered in conjunction with developments at Harts Farm Way. Due to the number of existing arms into the roundabout, the distances between them and the need for traffic to cross lanes to enter and exit the roundabout it is not possible to add an arm to connect Lower Road to the roundabout.</p>
<p>Traffic planning laws do not permit opening the cul-de-sac end of Lower Road onto the motorway feeder route and roundabout at the Rusty Cutter.</p>	
<p>Highways Report should be challenged. Will survey data used to support proposal be made public?</p>	<p>Survey data is collected by Hampshire County Council as Highway Authority for input into traffic model. Havant Borough Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, including the cumulative effects of other development proposals, and establish what mitigation measures are needed. The report of this will be published alongside other studies as part of the evidence base for the new Local Plan.</p>
<p>Concern over road safety; additional traffic will increase risk of accidents. Road narrow and no possibility to widen without compulsory purchase. No continuous pavement in particularly on bend, blind bends, parked cars, area used by elderly people from residential home, wheelchair users and cyclists (Lower Road is part of cycle network linking coastal route to Portsmouth), not safe for children to walk or cycle to school or park. No prospect for improvement to cycle route. Asked for speed humps in past but refused. Dangerous corner at Brookside Road/Lower Road</p>	<p>New development is expected to make provision for infrastructure through CIL and site specific planning obligations and highways agreements. If it is deemed that there is a need for improvements to (pavements/cycle routes) associated with the development, these will be considered as part of the planning process. Any improvements deemed necessary will be set out in the development requirements for each site.</p> <p>Lower Road does present challenges due to the bends, lack of pavement along part, constraints on road widening and the need to minimise the impact of traffic management measures on the conservation area.</p>

## UE30: Land south of Lower Road Bedhampton

126 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
junction.	
Concerns over access to site, including by emergency vehicles. Road not wide enough for two way traffic due to parking. Our property has no off-road parking. Bottom end of Brookside Road is used as a car park. Limited off-road parking along Lower Road so cars parked on road.	Large vehicles e.g. Refuse lorries already use Lower Road to access existing properties. Parking restrictions may be necessary to aid traffic flow and safety. Solutions to additional off-road parking could be sought through development.
New build developments often have very limited parking and don't allow commercial vehicle parking which will impact on surrounding roads that are already constrained for parking.	Havant Borough Council will continue to apply the evidence-base standards set out in the Parking SPD (July 2016): <a href="http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary">http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary</a> <a href="#">This policy requirement will be considered further through the Havant Borough Local Plan 2036.</a>
Concerns over infrastructure – general. Improvements will be necessary. Infrastructure must be delivered before development.	Throughout the Local Plan preparation process, the Council is in continuous dialogue with the providers of infrastructure, such as utilities companies, Hampshire County Council for highways and schools, and the NHS. It should be noted, however, that it is the responsibility of these bodies to bring forward the infrastructure they deem necessary to meet the needs of the population. Improvements will be necessary and these are being planned in advance of development. However funding streams and development phasing can mean infrastructure being delivered alongside, rather than in advance of development, to be operational by the time the development is occupied.
Concerns over utilities, particularly sewage facilities.	The Council is aware of the residents' concerns regarding utilities provision. Utility providers (water, gas, electricity) have a statutory obligation to provide services to new development. The Council works with these providers to ensure they are aware of proposed levels of development so that they can plan accordingly for new development.

## UE30: Land south of Lower Road Bedhampton

126 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	With regard to waste water infrastructure – see comments from Southern Water later.
Impact on/provision of community facilities and services – schools, GPs, hospital capacity.	<p>The Council is aware of residents’ concerns regarding health care provision. The Council is working closely with the South East Hampshire Clinical Commissioning Group to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.</p> <p>The Council is aware of residents’ concerns regarding education provision. The Council is working closely with Hampshire County Council as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.</p>
No plans published for increasing school places at Bidbury Infant and Junior Schools.	HBC’s Havant Strategic Infrastructure Delivery Statement (May 2014) identifies a need for an additional classroom at Bidbury Infant School and two additional classrooms at Bidbury Junior Schools by 2020, to be provided through a combination of developer and HCC funding.
Negative impact on character of the area of Old Bedhampton rural feel of area, peaceful, tranquil, quietness, and pleasant village. Old Bedhampton is oldest settlement in the Borough.	Development is not proposed within the conservation area itself although to access the site vehicular traffic generated by the development would pass through.
Development is contrary to Local Plan Policy CS11.	Various aspects of Policy CS11, concerned with protecting and enhancing the special environment and heritage of the Borough, are dealt with alongside more detailed comments below. This matter will also be considered further through the Havant Borough Local Plan 2036.
Building houses so close would destroy the essence of the special ‘charming’ character of the Old Bedhampton Conservation	The NPPF in its core planning principles states that, ‘planning should ... take account of the different roles and character of different areas ...’

## UE30: Land south of Lower Road Bedhampton

126 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>Area/historic buildings and church. Highway improvements would destroy the nature of the conservation area. The proposal goes against the primary principles of planning which should ensure development is 'in keeping with the character of the surrounding area and should conserve or enhance the setting of the adjacent conservation area'.</p> <p>Paragraph 72 of the Local Plan (Allocations) Inspector's Report (July 2014) recognised that the conservation area 'is a strong factor weighing against development'.</p>	<p>Core Strategy Policy CS11.4 states that 'Planning permission will be granted for development that, Protects and where appropriate enhances the Borough's statutory and non-statutory heritage designations by appropriately managing development in or adjacent to conservation areas ...'. This policy requirement will be considered through the Havant Borough Local Plan 2036.</p> <p>The Local Plan (Allocations) Inspector's Report July 2014 stated that 'the sites proximity to Old Bedhampton Conservation Area through which it would be accessed is a strong factor weighing against development.' At that time other more suitable sites were proposed for allocation to meet the local housing needs such that the impacts of the development outweighed the need for this particular site. However, that situation has now changed.</p>
<p>Damage to trees in conservation area caused by large lorries.</p>	<p>There are a limited number of trees within the Conservation Area that are protected and these are situated within the curtilage of properties rather than being within the boundary of the highway although their canopy may hang over the road in places.</p>
<p>Concerns over impact on ecology and nature conservation, including Brent Geese (fields are a known feeding ground) and other wildlife: Deer, foxes, Old Manor Farm Bats; buzzard and Red Kite; newts and slow worms seen in Lower Road; wildlife will be disturbed and their habitat destroyed.</p>	<p>The Local Plan (Allocations) Inspector's Report July 2014 stated that 'uncertainty of impact on biodiversity' (and other factors: Conservation area and agricultural land) 'justify the non-allocation of this site'.</p> <p>Development of greenfield sites will likely have some impact on wildlife on the sites affected. The Council is having ongoing discussions with bodies such as Natural England, the RSPB and the Hampshire and Isle of Wight Wildlife Trust to identify any key issues and ways in which impacts can be mitigated.</p> <p>Environmental impact assessment of proposals will identify any specific populations and further studies required as necessary at the planning application stage. This will be ensured where species are protected by other legislation requiring developers to survey and propose detailed mitigation measures which can include such as the installation of bat boxes on dwellings and translocation of protected species.</p> <p>The site is designated uncertain for Brent Geese and waders and Policy DM23 of the Local</p>

## UE30: Land south of Lower Road Bedhampton

126 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	Plan (Allocations) applies. This policy requirement will be considered through the Havant Borough Local Plan 2036. 3 years worth of survey data is required to determine the importance of the site, to the satisfaction of Natural England.
Development of Lower Road could prejudice development of employment site BD11. Employment allocation BD11 to south is an 'Important site for Brent Geese and/or waders'. UE30 could provide mitigation for this loss of habitat on BD11 and elsewhere.	The Havant Winter Bird Survey 2012-2015 indicates that despite site UE30 having high suitability for grazing and roosting, due to it being a large arable field (bare or stubble in winter) with good visibility and low disturbance, there are no recorded sightings of either Brent Geese or waders during the 3 survey winters.
Concern over loss of open fields, greenspace, last accessible rural area. Should take opportunity to use area as 'Dedicated Open Space Area' and make Old Bedhampton Village place to enjoy. Bidbury Mead is vital outdoor space. Lower Road Field falls within Local Plan provision for dedicated open space for residential enjoyment or as a community allotment. Children play in stream.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. However, the Council is keen to ensure that where possible, high quality, new open space is incorporated within the design and the layout of new developments.  The area to the south of Lower Road, both north and south of the railway line is not of high landscape value being assessed by the Landscape Capacity Study as having medium capacity for change.
Proposal leaves half of field unused and likely future target for further development. Development will not stop at 50 dwellings.	The field is not part of the current open space provision or allocated as such in the Local Plan. In fact there is no public right of way or access to this land at present. The nearest public footpath is part of the network that runs from Bedhampton Road, past Bidbury Mead (protected Local Green Space) and across the railway and A27 to Broadmarsh Coastal Park via Mill Lane.  Previous proposals by the developer/landowner included a much larger area with a capacity for 250 dwellings however it has since been acknowledged that development should be restricted to a lower number due to the impact of traffic on the conservation area. While the intentions of the landowner for the remaining area of the field are unknown there is potential to explore the use of remaining undeveloped areas for green infrastructure, for public open space and/or nature conservation.
Site is in an Area of Outstanding Natural Beauty (AONB).	The site lies outside of the Chichester Harbour AONB.

## UE30: Land south of Lower Road Bedhampton

126 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Concerns over loss of prime agricultural land where still grow crops annually. Remaining fields will become inaccessible to farm machinery and commercially unviable.	The NPPF expects local planning authorities to seek to use areas of poorer quality land in preference to that of a higher quality, where significant development of agricultural land is demonstrated to be necessary. However a balance must be struck with the requirement to meet identified housing needs in the Borough. Some loss of higher quality land cannot therefore be avoided.
Object to urban sprawl and loss of Portsmouth/Havant Green Buffer/picturesque buffer between built up areas. Won't tell where boundaries begin and end. Overdevelopment in area.	The Council no longer has a policy to protect gaps. However, development requirements on site layout will be included in the site allocation in the Local Plan to ensure that the development does not result in the coalescence of distinct settlements.
Concerns over air quality/pollution/noise.	The Council will explore the issue of air quality for the new Local Plan and work with partners on the results of modelling and any necessary avoidance and mitigation measures.
Concerns over noise, dirt and traffic during construction phase. Vibration could affect listed buildings along the route.	There will be some disturbance during the construction phase. However, this is not considered a valid reason to prevent development from coming forward. Details would be required to be submitted at the planning application stage regarding proposed mitigation measures, for consideration by the Council's Environmental Health Team. Conditions can be attached to planning permission for such as requirements for wheel washing to prevent mud on roads and to limit hours of operation of construction sites.
Concerns over flooding – addition of hard paved areas and housing will reduce soakage and increase risk of flooding. Fields at bottom of Brookside are on the edge of a designated Flood Zone. Fields south of Lower Road have flooded in the past in periods of heavy rain. Lower Road between last two corners regularly floods during heavy rainfall. Also flows down slope at end of Lower Road and collects in front of Manor Farm properties. Drainage can't cope now.	Flooding and drainage will be considered as proposals develop and it is expected that appropriate mitigation will be proposed in accordance with national and local flood risk policies. These require that development should not increase flood risk elsewhere.

## UE30: Land south of Lower Road Bedhampton

126 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Site is in Aquifer Protection Zone/concerns over water quality: no assessment of how this resource will be protected, including during excavation and building works.	HBC will continue to consult with Portsmouth Water regarding planning applications which are made in any of the Source Protection Zones (SPZs).  See comments from Portsmouth Water later.
Site is very close to railway line.	The railway line adjoins the southern boundary of the site so detailed design and layout will need to take account of this e.g. Noise attenuation.
What kind of houses would be built?	Policy CS9 expects development to provide a mix of dwellings types, sizes and tenures which help to meet identified local housing need. These policy considerations will be reviewed through the Havant Borough Local Plan 2036.
Support affordable housing but these houses won't be affordable. Properties would be expensive and do nothing to help those in need of low-cost accommodation.	Policy CS9 also expects sites of this size to deliver on average 30-40% affordable housing on site unless a lesser requirement is justified on viability grounds. These policy requirements will be reviewed through the Havant Borough Local Plan 2036.
Detriment caused will be disproportionate to benefit gained from this development.	Planning for new development involves balancing the need for the development with the impacts of the development, ensuring that the impacts can be mitigated or are not so severe as to justify refusal of planning consent.
Concerns over impact on property prices. Development would devalue existing properties.	The Government's objective in encouraging new house building is to make property more affordable for the majority. While residents may raise objections to development in their neighbourhood for fear that it will adversely affect house prices in the vicinity, this is not a matter that planning law and policy requires the local planning authority to take into account when planning for new residential development or determining planning applications.
Landowner trying to get rich quick.	In identifying a supply of sites it is necessary to ascertain from landowners that the land is either available now or there is a reasonable prospect that it will be available for development within the plan period. The landowner's motives for making the land available

## UE30: Land south of Lower Road Bedhampton

126 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	are not a planning matter.
Key issues raised by statutory consultees	HBC response
<b>Southern Water:</b>	
With regard to waste water infrastructure there is none crossing the site. The developer would need to make a connection at the nearest point of adequate capacity. This is not a constraint to development providing there is Planning Policy support for the provision of the necessary local infrastructure. We would therefore seek inclusion of the following policy wording for this site: <i>'Development proposals must provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.'</i>	Noted. Wording would be incorporated in the list of developer requirements.
<b>Portsmouth Water:</b>	
Land south of Lower Road, Bedhampton is in very close proximity to SPZ 1. Portsmouth Water has no objection in principle to development at this site however given the risk/link to abstraction from the Havant and Bedhampton Springs we request that we are consulted at the outset of any associated planning application in the future to ensure the safeguarding of public water supply.	The existence of Groundwater Special Protection Zone 1 is acknowledged. The Council will continue to consult and work with Portsmouth Water regarding planning applications which are made in any of the SPZs.
<b>Environment Agency:</b>	
Some locations around Havant and Bedhampton are particularly	To be noted in development requirements. Portsmouth Water and Environment Agency will

## UE30: Land south of Lower Road Bedhampton

126 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>sensitive in terms of groundwater (SPZ 1) as they are a significant drinking water resource. It is essential that development is undertaken in a way that does not impact on this either during construction or in perpetuity when completed.</p>	<p>be consulted on any planning application on the site.</p>
<p><b>RSPB:</b></p>	
<p>The proposed housing site is identified in the 'Solent Waders and Brent Goose Strategy' (SWBGS) (2010) as 'uncertain'. Erosion of this network of sites due to insufficient information is not acceptable. Further work is required to address the issues raised in the 'Status of SWBGS Sites in Havant Borough' (July 2016) before the proposed housing sites can be considered further.</p>	<p>Where sites are designated 'uncertain' for Brent Geese and waders, Policy DM23 of the HBLP (Allocations) applies. This policy requirement will be considered through the Havant Borough Local Plan 2036. Three years worth of survey data is required to determine the importance of the site, to the satisfaction of Natural England.</p>

### Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
<p>None.</p>		

## UE52: Land adjoining 47 Portsdown Hill Road

5 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Impact on nature conservation: site is part of a Site of Importance for Nature Conservation (SINC) where Policy CS11.3 applies. The Policy states that planning permission will be granted for development that has particular regard to the hierarchy of nature conservation designations in the Borough. Field is home to family of Roe Deer and part of wildlife passage through to shoreline.	Part of the SINC has already been built on through development of Local Plan allocation UE5. The area was designated a SINC in 2005 due to it being an important site for Brent Geese however the Havant Winter Bird Survey 2012-2015 only recorded waders as seen on this land in January 2013. The S106 agreement associated with the planning consent <sup>28</sup> for the adjoining triangle of land to the east requires that the southern irregularly shaped field is retained as arable land with rotational farming over a four year period for mitigation for Brent Geese (even though they were not seen when surveyed during winter 2013/14 - they were observed in significant numbers between 1995 and 1998) and Lapwings (albeit infrequent use during the survey period).
Impact on setting of adjacent listed building which would be harmed and not outweighed by development of 5 dwellings. 'Sunspan' concept design to take advantage of sun and views.	See Historic England response below.
Impact on gap: development would diminish character of local landscape and separation of settlements.	Development would reduce the size of the gap along Portsdown Hill Road by part filling in where frontage development extends along the road from Bedhampton westwards.
Loss of high grade agricultural land.	The NPPF expects local planning authorities to seek to use areas of poorer quality land in preference to that of a higher quality, where significant development of agricultural land is demonstrated to be necessary. However a balance must be struck with the requirement to meet identified housing needs in the Borough. Some loss of higher quality land cannot therefore be avoided.

<sup>28</sup> Reference APP/14/00232 permitted 5<sup>th</sup> November 2014.

## UE52: Land adjoining 47 Portsdown Hill Road

5 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Access to site from Portsdown Hill Road previously refused due to weight of traffic.	Consideration must be given to physical access to the site such that new access can be created with suitable levels and visibility splays, and off-site traffic management measures if necessary, to ensure highway safety for all road users.
Noise pollution from traffic.	Any development close to a road can be affected by traffic noise and can be addressed through design at the planning application stage.
Key issues raised by statutory consultees	HBC response
<b>Historic England:</b>	
Object to allocation. Site adjacent to Grade II Listed Sunspan House skewed to maximise views over Portsmouth. Development of the site will be in its setting and allocation might block view.	Position, type and detailed design of dwellings will be critical to addressing concerns over impact on the adjoining listed building. It is considered that five dwellings would be challenging to achieve without significant harm to the setting of the Grade II Listed Sunspan House. Whilst a yield of less than five on the site will likely be achievable, this would mean that the site should not be specifically identified in the SHLAA or Local Plan Housing Statement, as such the site will be removed.

### Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
Table 2	Remove from Housing Statement.	Undetermined whether indicated 5 dwellings can be accommodated without significant effect on the setting of the adjacent listed building.

## UE53: Land east of Castle Avenue

15 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
The land is unstable.	The developer will be required to demonstrate that the land is stable for development through appropriate geotechnical analysis in support of a planning application.
The proposed new housing will downgrade the quiet/suburban/semi-rural character of the area.	The Council acknowledges that further development will likely affect the character of the area. However, the Council is committed both to delivering further housing, as well as to ensuring that quality of life remains high.
The proposed site is contrary to Policy CS9.4 which states planning permission will be granted for housing proposals that will: 'Achieve a suitable density of development for the location, taking into account accessibility to public transport and proximity to employment, shops and services in addition to respecting the surrounding landscape, character and built form.'	<p>Upon the adoption of the Housing Statement, this policy will remain. Policy CS9 is best assessed through individual planning proposals, through the development management process, when a proposed plan and layout has been put forward for review.</p> <p>The National Planning Policy Framework (NPPF) states that Local Planning Authorities should set out their own approach to housing density to reflect local circumstances.</p> <p>As highlighted on page 61 of the Local Plan (Core Strategy); the density of new housing will depend on design and appropriateness to its location. As a guide, the following minimum density thresholds have been developed using the Havant Borough Townscape Landscape and Seascape Character Assessment and the levels of accessibility to a range of facilities:</p> <ul style="list-style-type: none"> <li>• High density – minimum of 60 dwellings per hectare.</li> <li>• Medium density – minimum of 45 dwellings per hectare.</li> <li>• Low density – up to 45 dwellings per hectare.</li> </ul> <p>Where the quality of design justifies it, much higher densities could be achievable. It is not intended that density requirements should be too prescriptive as it is often a difficult balance between maximising the use of the land and reflecting surrounding built character and the amenity of neighbouring residents. Therefore, this is best assessed through individual planning proposals through the application process.</p>
The number of homes for the area of the site is too high and will be double the density of Castle Avenue.	

## UE53: Land east of Castle Avenue

15 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
The proposed site goes against the Local Plan (Core Strategy) to protect undeveloped gaps between Emsworth and Havant.	The Council does not have a policy to protect gaps. However, development requirements on site layout will be included in the site allocation in the Local Plan to ensure that the development does not result in the coalescence of distinct settlements.
To compensate for loss of green space, an open space corridor between the old and new developments should be designated as a safe haven for wildlife.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. However, the Council is keen to ensure that where possible, high quality, new open space is incorporated within the design and the layout of new developments.
There is a variety of wildlife and birdlife seen on the site; their habitat should be protected.	<p>No overriding issues have been identified that would prevent allocation from coming forward.</p> <p>It is acknowledged that development of greenfield sites will be likely to have some impact on wildlife on the sites affected. The Council is having ongoing discussions with bodies such as Natural England, the RSPB and the Hampshire and Isle of Wight Wildlife Trust to identify any key issues and ways in which impacts can be mitigated.</p> <p>More detail on these matters will also be required to support any planning application on the sites, so that impacts and proposed mitigation measures can be considered in detail.</p>
The back gardens of Castle Avenue properties and the proposed site regularly flood due to a spring in the field and a high water table. The drainage problem will get worse as a result of new housing, as shown by the ground remaining waterlogged for longer since the Manor Farm/Nursery Fields development. Therefore, drainage must be addressed as part of development.	<p>Flooding and drainage will be considered as proposals develop and it is expected that appropriate mitigation will be proposed in accordance with national and local flood risk policies. These require that development should not increase flood risk elsewhere.</p> <p>With regard to wider flood risk issues, the Planning Policy Team is working closely with the Environment Agency and Hampshire County Council to determine how future development will be affected by surface water flood risk and what protection and mitigation measures can be put into place.</p>
Traffic will increase in residential areas as commuters will travel to	The comments made regarding specific roads and junctions have been noted and will be considered further as the Local Plan is progressed. Any improvements deemed necessary

## UE53: Land east of Castle Avenue

15 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Havant Road and the A27.	will be set out in the development requirements for each site. The Council has also commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport to assess and provide solutions to any capacity issues in the network.
New developments must have adequate parking as to not spill into surrounding streets.	Havant Borough Council (HBC) will continue to consult the evidence-base standards set out in the Parking SPD (July 2016):  <a href="http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary">http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary</a>
Access to site should be to the north and not in Castle or St George's Avenue.	HBC is unable to comment on access points at present as there are no firm plans. Nevertheless, comments made regarding potential access points to new developments have been noted and will be considered further as the Local Plan is progressed.
The long-overdue footbridge at the Warblington Crossing is needed for safety and to reduce pedestrian and cyclist congestion.	There is a shortfall in funding for the Warblington Level Crossing and other funding options are being explored; this includes a CIL bid, the outcome of which will be determined in February 2017.
The Castle Avenue/Emsworth Road junction is already dangerous for pedestrians and cyclists. Increased congestion along Emsworth Road will affect the busy cycle network along an already narrow road where vision is limited by parked cars.	The comments made regarding specific roads and junctions have been noted and will be considered further as the Local Plan is progressed. Any improvements deemed necessary will be set out in the development requirements for each site.
Noise cancelling techniques are needed to combat the likely increase in noise levels, especially if homes built near to the A27.	Any site specific issues and constraints that can be mitigated will be set out in the development requirements in the Local Plan and developers will be expected to demonstrate how these can be addressed.

## UE53: Land east of Castle Avenue

15 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
The privacy of Castle Avenue and St George's Avenue residents will be lost.	The privacy of properties on Castle Avenue and those on the end of St George's Avenue will be affected by the development of this site. The design and layout of future development will be required to consider the privacy of existing residents.
There has been no provision for GP surgeries.	The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the South East Hampshire Clinical Commissioning Group to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.
There has been no provision for schools, especially a secondary school.	The Council is aware of residents' concerns regarding education provision. The Council is working closely with Hampshire County Council (HCC) as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.
There should be an improved local outside space for children behind UE53.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. However, the Council is keen to ensure that where possible, high quality, new open space is incorporated within the design and the layout of new developments.
The landowner supports the site and confirms the land is available.	Support noted.
Concerns over noise/dirt/traffic during the construction phase.	It is accepted that there will be some disturbance during the construction phase. Details of measures to mitigate such impacts are generally secured by means of condition at the planning application stage. As such it is not considered a valid reason to prevent development from coming forward.

## UE53: Land east of Castle Avenue

15 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
There is the potential to increase house prices if development is to a high standard.	This is not a matter which can be considered or addressed through the planning process.
There is support for affordable housing; however, these are often still too expensive for first time buyers.	<p>New development is expected to provide between 30% and 40% affordable housing. This can be in a variety of formats and will usually be determined in accordance with the Council's Housing Service and with affordable housing providers.</p> <p>The Council is not in a position to control the prices developers demand for homes. The Council can, however, try to improve the supply of new homes by identifying sites suitable for development. It can also seek a proportion of affordable homes (Social rented, affordable rented and intermediate housing) in developments.</p>
Accept need for homes in principle, but this site is unsuitable.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development.
Why is the whole area east of Castle Avenue (UE53) not being developed?	The site in question is UE02a. See separate table titled 'Sites not in the Plan'.
Key issues raised by statutory consultees	HBC response
<b>Hampshire County Council:</b>	
In regard to mineral safeguarding, Hampshire County Council (HCC) believes the site is likely to be underlain by sand and gravel. Therefore, prospective developers should undertake a mineral assessment and explore opportunities to use these minerals.	<p>HBC will continue to work with HCC and will continue to incorporate the policies underlain in the Hampshire Minerals and Waste Plan (2013).</p> <p>Prior extraction of minerals to avoid sterilisation by development is not always feasible or practicable and it is acknowledged that investigation may be required at individual site level before development proceeds to determine whether it is appropriate for prior extraction or if the merits of development outweigh the safeguarding.</p>

## UE53: Land east of Castle Avenue

15 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<b>Portsmouth Water:</b>	
<p>Portsmouth Water has stated that the site is located in Groundwater Special Protection Zone (SPZ) 1C and has no objection in principle to development on this site.</p> <p>However, given the risk/link to abstraction from the Havant and Bedhampton Springs, they request that they are consulted at the outset of any associated planning application in the future, to ensure the safeguarding of public water supply.</p>	<p>HBC will continue to consult with Portsmouth Water regarding planning applications which are made in any of the SPZs.</p>

### Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
<b>Local Plan</b>	Highlight in development requirements likely presence of sand and gravel and need to explore prior extraction within the developable area	To ensure that minerals resources are not needlessly sterilised.
<b>Local Plan</b>	Note in development requirements that site is situated within Groundwater Source Protection Zone 1Cs (SPZ 1Cs), located at depth beneath the Lambeth Group. Need to be aware of pollution pathway in the Havant & Bedhampton Springs and that SUDS schemes, foundation design and ground investigation information will need to be approved.	To ensure groundwater pollution is prevented.

**UE55: Southleigh Park House**  
7 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
<p>Welcome positive approach of Housing Statement and for landholding to be included. Owner confirms UE55 is available for early release. Redevelopment would enhance setting of listed building and deliver new homes.</p>	<p>Support and availability of site for early release is acknowledged.</p>
<p>Site should not be listed as greenfield but previously developed.</p>	<p>The NPPF definition of previously developed land includes, 'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed infrastructure.'</p> <p>Amend Table 2 and supporting text to acknowledge 'previously developed land'. Nonetheless, the site remains outside of the settlement boundary as defined by Policies CS17 and AL2.</p>
<p>Site capacity significantly exceeds indicative 35 dwellings.</p>	<p>Further work will be needed to confirm whether the indicative number of dwellings is achievable within the setting of the listed buildings (main house, Coach House, Clock Tower Building and Lodge – all Grade II - and Dairy) to avoid substantial harm to Listed Buildings and the TPO trees. Additional assessment will be required to ensure the retention of the listed buildings is viable. The indicative yield of 35 dwellings is an initial precautionary assessment pending more detailed information and studies.</p>
<p>Under current proposal for up to 95 dwellings with the house converted into flats and the remainder (about 85 dwellings) in the grounds to the north will result in an undesirable density of housing.</p>	<p>See above. The proposal for a considerably larger number of dwellings than the 35 included in Table 2 of the Housing Statement is currently under consideration. Some information is already in the public domain through a Development Consultation Forum held on 1 September 2016 and on the Council's Website.</p>
<p>Concerns over road capacity and safety should be resolved before any further development permitted in the area. Eastleigh Road is used as a 'rat run' between the A27 and A3M. Respondent suggests cutting Eastleigh Road at a point south of Southleigh Park</p>	<p>An assessment of traffic impact on the local road network is required which will take account of the amount and nature of the traffic already generated by the current occupier of the site.</p>

**UE55: Southleigh Park House**  
7 responses were received regarding this topic

**Consultation Responses**

House so that the two ends form cul-de-sacs but retain a link for pedestrian and cyclists, or discouragement measures are needed.	The cumulative impact of traffic will be considered through a full plan Transport Assessment. Part of the updated evidence base.
Parkland area to south of Southleigh House should be protected from development that would erode the strategic view from Southleigh Park House and affect development viability.	The 'Denvilles-Emsworth' Strategic Site will require green infrastructure and public open space to be part of the overall development proposals. The disposition of land uses would be determined through a masterplan so that the layout of development and open areas within the area would take account at that stage of features such as the Grade II listed Southleigh Park House at that stage.
Development north of Southleigh Road could cause flooding problems in lower lying areas to the south.	HBC is continuing to work closely with the Environment Agency and HCC as Lead Local Flood Authority to understand the cumulative flood risk of developments and deliver solutions to mitigate risks. Those agencies are also consulted on individual planning applications.
<b>Key issues raised by statutory consultees</b>	<b>HBC response</b>
<b>Historic England:</b>	
Southleigh Park House and Clock Tower Building are Grade II Listed buildings. These should be retained and their setting respected in any masterplan/development brief, allocation policy or development proposals for this site.	The importance of protecting, and where appropriate enhancing, the Borough's listed buildings is recognised through Local Plan (Core Strategy) Policy CS11.4. This policy will be reviewed through the Havant Borough Local Plan 2036.  As stated above, further work will also be needed to confirm whether the indicative number of dwellings is appropriate within the setting of the listed buildings (main house, Coach House, Clock Tower Building and Lodge – all Grade II - and Dairy) and the TPO trees. Additional assessment will be required to ensure the retention of the listed buildings is viable.
<b>Hampshire County Council:</b>	
Minerals Safeguarding: Site likely to be underlain by sand & gravel. Prospective developers should undertake a mineral assessment	Prior extraction of minerals to avoid sterilisation by development is not always feasible or practicable and it is acknowledged that investigation may be required at individual site level

**UE55: Southleigh Park House**  
7 responses were received regarding this topic

**Consultation Responses**

and explore opportunities to use the minerals.	before development proceeds to determine whether it is appropriate for prior extraction or if the merits of development outweigh the safeguarding.
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**Portsmouth Water PLC:**

<p>SPZ 1C - Groundwater Special Protection Zone 1C Portsmouth Water has no objection in principle to development at this site. However given the risk/link to abstraction from the Havant and Bedhampton Springs, we request that we are consulted at the outset of any associated planning application in the future to ensure the safeguarding of public water supply.</p>	<p>The existence of Groundwater Special Protection Zone 1C is acknowledged. The Council will continue to consult and work with Portsmouth Water regarding planning applications which are made in any of the SPZs.</p>
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**Proposed Modifications to the Housing Statement**

<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
3.10	Insert 'and previously developed' after 'greenfield'.	The curtilage of Southleigh Park House falls within the definition of previously developed land as set out in the NPPF.
Table 2	Insert 'and previously developed' after 'greenfield'.	As above.

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
The site is vital to maintain the identities of Havant and Portsmouth, or in particular Bedhampton and Farlington, and prevent urban sprawl.	The Council no longer has a policy to protect gaps. However, development requirements on site layout will be included in the site allocation in the Local Plan to ensure that the development does not result in the coalescence of distinct settlements.
The Partnership for Urban South Hampshire (PUSH) Spatial Position Statement (June 2016) seeks to protect gaps.	PUSH Position Statement S1 states that strategic countryside gaps between settlements are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities This principle only deals with gaps so significant that they are of sub-regional importance. The only gap specifically listed in that statement in this respect is the Meon Valley (Fareham Borough). However, the Council does not consider the site represents a gap of sub-regional importance. Development requirements on site layout will be included in the site allocation in the Local Plan to ensure that the development does not result in the coalescence of distinct settlements.
PUSH is a non-statutory body.	The Council acknowledges that PUSH is a non-statutory body. However, the NPPF states in paragraph 159 that authorities must seek to meet the full OAN for housing in their area, and, in paragraph 178, that “public bodies have a duty to cooperate on planning issues that cross administrative boundaries”. Housing markets cross local authority boundaries, and HBC falls under the wider Portsmouth HMA. HBC’s membership of and work with PUSH contributes to discharging the duties in the NPPF.
Questions over Objectively Assessed Need (OAN).	House building is one of the Government’s top priorities, and the NPPF makes clear that Local Plans should meet the full OAN for their area. Even with all the sites put forward in the Housing Statement, the full OAN will not be met.
The Objectively Assessed Need (OAN) is based on pre-Brexit projections.	The OAN is based on the best evidence available at this moment in time. It is too early to anticipate future migration patterns, as the exact conditions of Britain’s exit from the EU remain uncertain, and it is not feasible to delay the production of the Local Plan until further details emerge. In any case, it should be noted that the housing sites put forward for inclusion in the new Local Plan do not meet the full OAN, so any reduction in international

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	migration is unlikely to mean the site allocations put forward are not needed.
The proposal goes against the Havant Gaps Review 2012.	<p>The Havant Gaps Review (2012) was informed by previous Landscape Character Assessment work. Nevertheless, due to a higher housing target, along with limited sites for development in the Borough, the Council has had to review its stance. With this, decisions for development in greenfield/urban extension sites will now be considered in accordance with Guiding Principle 4.</p> <p>The Havant Landscape Capacity Study<sup>29</sup> identifies Forty Acres as lying within the 'Open Lower Harbour Plain' and the 'South Moor and Broadmarsh Coastal Park'. The report places a particular emphasis on the restoration of landscape character for this area, with specific reference to the visual impact associated with major transport corridors. The guidance recommends restriction of development adjacent to the harbour edge to maintain the natural development free character of Langstone Harbour, but does not make similar provision for other parts of the character area.</p>
Is it possible to buy the land, in order to stop it being developed and turn it into open space/playing fields?	It would be for the individual or group to approach the landowner.
Policies AL2 and CS17 should be upheld.	It is not proposed that policies AL2 and CS17 be deleted. Rather it is proposed through General Principle 4 in the Housing Statement that these policies should not apply to the sites listed in Table 2, as these sites are considered to be capable of delivering sustainable development.
The loss of green space in the area will affect health and	In order to address the Borough's housing need it is inevitable that all undeveloped areas

<sup>29</sup> <https://www.havant.gov.uk/localplan/evidence-base>

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
community activities.	that are free from significant constraints need to be considered for development. However, the Council is keen to ensure that where possible, high quality, new open space is incorporated within the design and the layout of new developments.
The capacity of gas, electricity and water supply utilities are over-stretched.	The Council is aware of the residents' concerns regarding utilities provision. Utility providers (water, gas, electricity) have a statutory obligation to provide services to new development. The Council works with these providers to ensure they are aware of proposed levels of development so that they can plan accordingly for new development.
Telephone and broadband provision in the area is poor.	Broadband provision will continue to be provided under Part R of the Building Regulations, see link below:  <a href="https://www.gov.uk/Government/consultations/new-part-r-of-the-building-regulations">https://www.gov.uk/Government/consultations/new-part-r-of-the-building-regulations</a>
The capacity of Budds Farm Wastewater Treatment Works is being over-stretched. As a result, heavy rainfall leads to foul water drainage and sewage discharges into Langstone Harbour.	The Council is aware of the concerns residents have raised regarding the provision of waste-water provision and the concerns over the capacity of Budds Farm. Utility providers have a statutory obligation to provide services to new development. The Council will continue to consult and work with Southern Water to ensure that new development is incorporated into their future business planning.
The new properties should have solar power.	The Government has abolished the Code for Sustainable Homes and has severely limited Councils' ability to seek ambitious levels of sustainable construction. However, sustainable construction requirements have largely been subsumed under Part L of the Building Regulations.
The current infrastructure is not good enough to cope with the current population.	A key part of the drafting of the Local Plan is to identify the infrastructure improvements/additions required to make proposed sites sustainable.  In terms of strategic infrastructure, in a climate of extremely limited resources, forward funding of infrastructure is not always possible. However, having a plan in place will allow

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>Infrastructure improvements should be delivered before development takes place.</p>	<p>the Council to bid for funds for strategic infrastructure in order to bring these forward at the earliest opportunity.</p> <p>Throughout the Local Plan preparation process, the Council is also in continuous dialogue with the providers of infrastructure, such as utilities companies and public transport providers, HCC for highways and schools, and the NHS. It should be noted, however, that it is the responsibility of these bodies to bring forward the infrastructure they deem necessary to meet the needs of the population.</p>
<p>The money obtained through Section 106 agreements should be used towards infrastructure improvements necessary for the local area.</p>	<p>The money obtained through section 106 contributions can only be spent in accordance with the relevant section 106 legal agreement.</p>
<p>Congestion has increased due to recent developments; one accident can lead to gridlock.</p>	<p>The comments made regarding specific roads, junctions and pedestrian routes have been noted and will be considered further as the Local Plan is progressed. Any improvements deemed necessary will be set out in the development requirements for each site.</p>
<p>Traffic lights at the approach to the Rusty Cutter roundabout from Forty Acres, as well as a yellow junction box are required.</p>	
<p>There should be traffic lights at the entrance to Forty Acres.</p>	
<p>Motorists travelling to Portsmouth, via the Rusty Cutter roundabout, use the inside lane and then cut across at the last minute.</p>	

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>The Rusty Cutter roundabout has inadequate pedestrian and cycle crossing/routes over the A3 and A27 slip roads.</p>	<p>HBC will continue to support HCC's initiative on School Travel Planning<sup>30</sup>.</p>
<p>It is not safe for school children to cross the Rusty Cutter roundabout in order to get to school.</p>	
<p>The Residents Committee conducted an independent assessment of the Rusty Cutter Roundabout a few years ago and found it not fit for purpose. Therefore, traffic surveys must be conducted.</p>	<p>The Housing Statement represents the first part of the Local Plan process. The NPPF states that evidence to support the plan should be proportionate to the stage of the plan process. It would not be reasonable at this stage to expect a full (traffic) assessment.</p> <p>However, appropriate levels of assessment will be required to support the site allocation as it progresses through the Local Plan process.</p> <p>The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport to assess and provide solutions to any capacity issues in the network.</p>
<p>An increase in traffic will lead to a rise in air pollution which will affect residents' health and quality of life.</p>	<p>The Council will explore the issue for the Local Plan and work with its partners on the results of modelling and any necessary avoidance and mitigation measures.</p>
<p>An increase in traffic will lead to a rise in noise pollution which will affect residents' quality of life.</p>	<p>Any site specific issues and constraints that can be mitigated will be set out in the development requirements in the Local Plan and developers will be expected to</p>

<sup>30</sup> <http://www3.hants.gov.uk/servicesforschools/school-travel-planning.htm>

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	demonstrate how these can be addressed through a planning application.
The Rusty Cutter Roundabout requires more than one pedestrian crossing in order to access public transport facilities and reduce further congestion from reliance on cars.	The comments made about specific roads, layout, junctions and pedestrian routes have been noted and will be considered further as the Local Plan is progressed. Any additions/improvements necessary will be set out in the development requirements for each site.
The new development must come with adequate parking to prevent vehicles from being parked outside the properties of current residents.	Havant Borough Council (HBC) will continue to consult the evidence-base standards set out in the Parking SPD (July 2016): <a href="http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary">http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary</a> <a href="#">This policy requirement will be considered through the Havant Borough Local Plan 2036.</a>
The proposed A27 junction will not ease the burden of a huge development.	The Council will continue to support a new junction from the A27, unless evidence arises that this is not feasible. The Council has commissioned a Transport Assessment to assess further possible strategic highways infrastructure requirements and will work with the Highway Authority and Highways England to consider which proposals offer the best solutions to traffic alleviation around the Borough.
There is a lack of public transport in the area.	The Council is aware of the concerns residents have raised regarding the provision of public transport. The Council does not itself provide public transport services, but liaises with rails and bus service providers to ensure they are aware of proposed levels of development, and to seek to improve services and facilities.
Westways and East Lodge Park would be unsuitable access points to the new development.	HBC is unable to comment on access points at present as there are no plans to consult. Nevertheless, comments made regarding suggestions/objections to potential access points to new developments have been noted and will be considered further as the Local Plan is

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
An access from Havant Road would be dangerous.	progressed.
An access from Havant Road would be less disruptive; the existing farm shop access has been suggested.	
Portsmouth City Council (PCC) should be consulted on the impact of local services.	HBC will continue to work with Portsmouth City Council (PCC) and will consult with them through every stage of the process.
Police and Fire Services are over stretched.	The Council consults with the emergency services on major development proposals. As the Local Plan progresses, the Council will continue to work with these services to help identify need. However, the provision and location of fire, ambulance and police stations is the responsibility of the emergency services and not the Council.
Waste facilities are over stretched.	Household Waste Recycling Centres are operated in the Borough by Veolia on behalf of HCC. In early 2016, HCC carried out consultation with all stakeholders including local authorities and residents. As part of this consultation, HCC have not raised any concerns regarding the capacity of waste facilities.  For further information, please see: <a href="http://www3.hants.gov.uk/mineralsandwaste/infrastructure.htm">http://www3.hants.gov.uk/mineralsandwaste/infrastructure.htm</a>
Leisure facilities are over stretched.	The Council will seek to ensure that high quality, new open spaces are provided as part of new developments. The Council also charges developers under the Community Infrastructure Levy, and uses funds to provide community infrastructure.  Through Local Plan policies, the Council seeks to protect community facilities wherever possible. It should be noted, however, that publicly run facilities are under severe

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	budgetary pressures and all Councils have to review the viability of these services. In addition, many leisure facilities are private businesses, and the Council cannot force these to be set up or remain open. However, if opportunities do arise and the Council is able to help enable the provision of facilities the Council will assist where appropriate.
There has been no plan made for additional services for doctors surgeries, hospitals and dentists.	The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the South East Hampshire Clinical Commissioning Group to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.
The current schools are at capacity.	The Council is aware of residents' concerns regarding education provision. The Council is working closely with HCC as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.
A new school is necessary for the area.	
A school catchment area review is necessary as children are forced to attend Havant Schools that are not within walking distance instead of schools in the Portsmouth catchment area which are nearer.	
The footpaths around the Rusty Cutter Roundabout are in disrepair.	New development is expected to make provision for infrastructure through CIL and site specific S106. If it is considered that there is a need for improvements to pavements or the road surface or if crossings are needed, which are associated with the development, these will be considered as part of the planning process.
The road surface around the Rusty Cutter Roundabout is inadequate and liable to subsidence and cracking.	
Pedestrians could gain safe access to the proposed site and current bus stop if Havant Road had a pelican crossing and a	

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
pavement on its south side.	
Community safety is a 'key priority' for HBC, however, it has not been 'embedded from the beginning of the development process' as promised by the Core Strategy in 2011.	Community safety remains a priority of HBC. The consultation of the Housing Statement is only the first stage of the Local Plan review. Safety considerations will be reviewed as planning applications are received. HBC will continue to consult with the Crime Prevention Design Advisor where appropriate.
Concerns over increased traffic during the construction phase; a 30mph speed limit has been suggested.	It is accepted that there will likely be some disturbance during the construction phase. However, this is not considered a valid reason to prevent development from coming forward. A Construction Management Plan will be developed and agreed with the developer to provide mitigation measures to minimise disruption during the construction phase.
The construction phase will contribute to health problems, especially coughing from the dust produced.	As with all planning applications, if development was to take place, then the developer would be requested by Havant Borough Council (HBC) to advise the Environmental Health Pollution Team of HBC as to what measures would be put in place for the control of any dust that might emanate from the development site. This is in order to protect the occupants of nearby residential properties from dust pollution.
The south section of the site is in Flood Zones 2 and 3 (CS15). Any development near the site will increase water runoff and exacerbate the existing problem and lead to flooding in adjacent areas, i.e. The Farlington Marshes SSSI and East Lodge Farm.	It is not expected that any part of the site which lies within Flood Zones 2 or 3 will be developed. Flooding and drainage will be considered as proposals develop and it is expected that appropriate mitigation will be proposed in accordance with national and local flood risk policies.
Climate change and sea-level rise may exacerbate the flooding problem as the site is low-lying.	With regard to wider flood risk issues, the Planning Policy Team is working closely with the Eastern Solent Coastal Partnership and the Environment Agency to determine how future development will be affected by flood risk and what protection and mitigation measures can be put into place.

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
A full flood investigation must be carried out.	The Housing Statement represents the first part of the Local Plan process. The NPPF states that evidence to support the plan should be proportionate to the stage of the plan process. It would not be reasonable at this stage to expect a full flood assessment. However, appropriate levels of survey and assessment will be required to support the site allocation as it progresses through the Local Plan process. HBC will continue to consult with the Environment Agency (EA) and all relevant organisations as appropriate.
Development within a Flood Zone will affect home insurance of new and current residents.	Insurance is not a matter which can be considered or addressed through the planning process.  Nevertheless, flood risk is a planning matter. As in line with the NPPF, development will be avoided on Flood Zones 2 and 3.
Policies Map 7 (of Allocations Plan) shows UE68 within the area of 'development in the coastal zone'. In order for development proposals to be accepted within the coastal zone, 7 tests of Policy DM9 are required.	Planning applications that are received by Havant Borough Council (HBC) will only be granted permission for development in the coastal zone providing they address all 7 criteria set out in DM9 (Please see page 135 of the Local Plan (Core Strategy). This policy requirement will be considered for inclusion in the Havant Borough Local Plan 2036.
The site acts as a green corridor for wildlife which links the Forest of Bere, Portsdown Hill, Langstone Harbour (SPA & SAC) and the Farlington Marshes (SSSI). Development would lead to habitat damage in the surrounding area via wildlife displacement and the removal of established flora and fauna.	No overriding issues have been identified that would prevent allocation from coming forward.  It is acknowledged that development of greenfield sites could have some impact on wildlife on the sites affected. The Council is having on-going discussions with bodies such as Natural England, the RSPB and the Hampshire and Isle of Wight Wildlife Trust to identify any key issues and ways in which impacts can be mitigated. The Council will continue to follow all applicable national policy and regulatory requirements regarding protected species.  More detail on these matters will also be required to support any planning application on the sites, so that impacts and proposed mitigation measures can be considered in detail.

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
An environmental/biodiversity impact study must be carried out.	The Housing Statement represents the first part of the Local Plan process. The NPPF states that evidence to support the plan should be proportionate to the stage of the plan process. It would not be reasonable at this stage to expect a full assessment. However, appropriate levels of survey and assessment will be required to support the site allocation as it progresses through the Local Plan process.
Policy CS11 (Protecting and Enhancing the Special Environment and Heritage of Havant Borough) sets out 11 requirements that need to be satisfied for development proposals. One of these requirements states particular regard must be given to Sites of Importance for Nature Conservation (SINC).	The site is not designated as a SINC; please refer to the Proposals Map associated with the Local Plan (Allocations). The presence of notable and protected species however would be a material planning consideration in its own right. Policy CS11 will continue to be upheld and any planning application received will continue to be examined against the 11 requirements as set out in the Local Plan (Core Strategy) policy (2011).
Sections of the site should be set aside as a nature reserve.	There are sections of the site which either have a gas main running underneath or are situated in Flood Zones 2 and 3. These parts of the site cannot be used for housing development and may provide an opportunity to deliver biodiversity improvements.
Hedgerows should be constructed to act as transport corridors for current wildlife.	It is acknowledged that development of greenfield sites will likely have some impact on wildlife on the sites affected. The Council is having on-going discussions with bodies such as Natural England, the RSPB and the Hampshire and Isle of Wight Wildlife Trust to identify any key issues and ways in which impacts can be mitigated.  More detail on these matters will also be required to support any planning application on the sites, so that impacts and proposed mitigation measures can be considered in detail.
Protected and endangered species are found on this site.	The legal requirements regarding protected and endangered species, along with the guidelines set out in the Habitat Regulations Assessment (HRA) will continue to be upheld. HBC will continue to consult with Natural England (NE) on the matter.
In Policies Map 7, the northern half of the site is marked as	The site is designated uncertain for Brent Geese and waders and Policy DM23 of the HBLP (Allocations) applies. This policy requirement will be considered through the Havant

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
'uncertain' for Brent Geese and waders; this relates to Policy DM23.	Borough Local Plan 2036. Three years worth of survey data is required to determine the importance of the site, to the satisfaction of Natural England.
The 'Agricultural Land Classification Map for London and the South East (ALC007)' (published by Natural England, August 2010) shows a proportion of the site to be classified as Grade 1 Agricultural Land. Statement 112 of the NPPF states that LPAs 'should seek to use areas of poorer quality land in preference to that of higher quality'.	The NPPF expects local planning authorities to seek to use areas of poorer quality land in preference to that of a higher quality, where significant development of agricultural land is demonstrated to be necessary. However a balance must be struck with the requirement to meet identified housing needs in the Borough. In addition, all poorer quality agricultural land has either already been developed upon or being proposed for development; therefore, loss of higher quality land cannot be avoided in order to meet the objectively assessed need.
The site is still used to grow crops and will be needed to feed our growing population.	Moreover, as the eastern and southern sections of the site cannot be developed upon due to the gas main and Flood Zone designation; it is an ideal opportunity to use part of the site for open space, as well as allotments due to the high grading of the soil.
The One Eight Zero development offers 46 plots but only utilises less than 50% of the available land. Are more homes are planned for this site (i.e. between Fortunes Way and One Eight Zero) or can it be used as alternative to Forty Acres?	Development on the site between One Eight Zero and Fortunes Way is not being considered as part of this Housing Statement. The land in question contains a high pressure gas main and is secured as part of the One Eight Zero. As a result, it is not available for, nor suitable for development.
There have already been a high number of dwellings built in this area (i.e. One Eight Zero); the residents were tolerant to this site, but oppose development on Forty Acres.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development.
Accept need for homes in principle, but the site is unsuitable for 300 homes.	The appropriate traffic assessments and ecological surveys will be required to be carried out to determine the site's viability and suitability for 300 homes.
Forty Acres should be the last resort for development once all other	

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
available, more suitable areas are used.	
The constraints to this development are vital considerations and more important than meeting Government housing targets.	
The flat space of the site would be suitable for an air ambulance to land.	This would be a matter for the commissioning body – no response has been received suggesting this item from the relevant stakeholder
Crime rates increase in areas when social housing is built.	If new developments are well designed, well laid out and well integrated with existing communities there is no reason that crime and anti-social behaviour should increase.
The proposed development will produce an overcrowded environment and thus destroy the rural, peaceful and sought after location.	The Council acknowledges that further development will affect the character of the area. However, the Council is committed both to delivering further housing, as well as to ensuring that quality of life remains high.
The community events currently operating on the site will be forced to stop.	The Council acknowledges that alternative sites will need to be found. Nevertheless, the site is private property and its use for community events is at the discretion of the landowner.
The development must not exceed two storeys.	It is not possible for HBC to comment specifically as no planning applications have been received for review. Nevertheless, any new development must be in keeping with the character of the area; this includes built form.
Support for affordable housing.	New development is expected to provide between 30% and 40% affordable housing. This can be in a variety of formats and will usually be determined in accordance with the

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Social housing should not all be in one development.	<p>Council's Housing Service and with affordable housing providers.</p> <p>The Council is not in a position to control the prices developers demand for homes. The Council can, however, try to improve the supply of new homes by identifying sites suitable for development. It can also seek a proportion of affordable homes (Social rented, affordable rented and intermediate housing) in developments.</p> <p>Policy CS9.3 Housing aims to ensure mixed communities.</p>
Residents are not convinced that the homes will genuinely be affordable; examples of One Eight Zero providing premium accommodation.	<p>The Council is not in a position to control the prices developers demand for homes. The Council can, however, try to improve the supply of new homes by identifying sites suitable for development. It can also seek a proportion of affordable homes (Social rented, affordable rented and intermediate housing) in developments. The One Eight Zero Development included affordable housing.</p>
The proposed development will devalue current property prices and raises questions over changes to Council Tax banding.	<p>This is not a matter which can be considered or addressed through the planning process.</p>
The views, which residents paid a premium for, will be lost.	<p>The views of properties surrounding the site will be affected by the development. The planning process is not able to protect views; however, the design and layout of future development will be required to consider the amenity of existing residents.</p>
The new housing should be built nearer to the motorway to maintain a gap between Westways and the new builds.	<p>Havant Borough Council (HBC) is unable to comment on specific points regarding the site as there are no planning applications currently submitted. Nevertheless, the comments made have been noted and will be considered further as the Local Plan is progressed.</p>
The developer states that the land is available, achievable and deliverable. The Masterplan shows that constraints can be overcome.	<p>Noted.</p>

## UE68: Forty Acres

161 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
There has been a lack of input in the Masterplan/concern for the community of West Bedhampton.	The masterplan being referred to was created by a developer and not the Council. A masterplan is not a planning application. Any application received for the site will be subject to the development management process, whereby residents will be able to comment on the specific details of the plan. Pre-application consultation and a Development Consultation Forum will also be encouraged by the Council.
Support site.	Support noted.
The proposed site goes against Policies CS1, CS11, CS15, CS20, DM8, DM9 and DM11.	Upon the adoption of the Housing Statement, these policies will remain. Therefore, any planning application received would need to demonstrate how these policies will be upheld.
The Portsdown Hill Project means that Forty Acres is a 'no go' area. Therefore, there should be no building in the Bedhampton/Farlington Border.	The Portsdown Hill Countryside Management Project aims to conserve and enhance the natural beauty, wildlife and amenity of the countryside area. Nevertheless, this does not refer to the site UE68 Forty Acres.

### Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
Local Plan	Mention in the development requirements that the site is partially within Flood Zones 2 and 3.	To ensure that flood risk is minimised.

## Hayling Island development in general

265 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>Accept need for new homes but Hayling Island is a unique situation – recognised at Core Strategy by Inspector.</p>	<p>The Council recognises the unique characteristics of Hayling Island, which have been emphasised through the public consultation on the housing statement. The Inspector noted the access issues at the Core Strategy Examination. Having regard to the comments received, the Council is proposing to amend the proposed sites to exclude them from early release in the Housing Statement. This is so that further work can take place regarding the single access route onto Hayling Island and any necessary mitigation measures can be included in the allocations for those sites.</p>
<p><b>Flooding</b></p>	
<p>Site specific flooding due to removal of trees and hedgerows as well as the clay soil.</p> <p>Concerns over flooding on Hayling Island generally and the condition of flood defences.</p> <p>Concerns over the impact of flooding on access points either side of Hayling Bridge.</p> <p>There is localised flooding in St Marys Road.</p> <p>Concerns over poor drainage, which is inadequate and leads to flooding in winter. Development will make drainage worse as developing fields removes natural soakaway defence.</p>	<p>It is not expected that any part of the site which lies within Flood Zones 2 or 3 will be developed. Flooding and drainage will be considered as proposals develop and it is expected that appropriate mitigation will be provided in accordance with national and local flood risk policies. Where specific drainage issues are identified, the developer will be expected to address these to ensure that on-site drainage provision is appropriate.</p> <p>With regard to wider flood risk issues, the Planning Policy Team is working closely with the Eastern Solent Coastal Partnership and the Environment Agency to determine how future development will be affected by flood risk and to ensure that appropriate safeguards are in place to prevent any increase in flood risk to existing properties.</p>

## Hayling Island development in general

265 responses were received regarding this topic

### Consultation Responses

Flood defences are in a poor state of repair. This increases coastal erosion and impacts on the Hayling Billy Trail.

The Planning Policy Team is working closely with the Eastern Solent Coastal Partnership and the Environment Agency to determine which, if any, flood defences need to be improved to make future development and access to and from the Island, safe.

#### Impact on tourism

Congestion on the roads puts visitors off visiting the island. Visitors are attracted by the rural character found on Hayling Island.

The Council acknowledges that further development will affect the character of the area. However, the Council is committed both to delivering further housing, as well as to ensuring that the quality of the environment remains as high as possible, for both residents and visitors. Congestion is recognised as a key issue and the Council proposes further work on this before allocating any more greenfield sites for development.

Concerns over the capacity of the highway network, particularly in respect of the single access via the bridge and road. A second bridge is needed.

The proposals will have a negative impact on the character of area. Proposals to consider should include:

- A one way system
- Widen West Lane, Northney
- Fund Hayling Ferry
- Reduce fares on public transport at peak times
- Mini roundabout needed at top of West Lane
- Hedges along West Lane should be cut back

The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport, to assess and provide solutions to any capacity issues in the network.

Comments made regarding specific roads and junctions will be considered further as the Local Plan is progressed. Any improvements deemed necessary will be set out in the development requirements for each site.

The Council acknowledges that there is only a single point of access onto and off Hayling Island. Although there is a great deal of data regarding this single access, further assessment is required to understand traffic movements on and off the Island. Following consultation on the Housing Statement, it is evident that this is one of the key issues for residents on the Island.

Comments made regarding specific roads or junctions will be considered further as the Local Plan is progressed. Any improvements deemed necessary will be set out in the development requirements for each site.

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<p>Concerns over the impact of congestion, especially when a vehicle breaks down or there are horses, bikes or refuse vehicles using the road.</p> <p>30mph speed limits have the effect of reducing the traffic flow.</p>	
<p>Little can be done to improve highway capacity.</p>	
<p>West Lane is over used and dangerous.</p>	
<p>The proposed junction on the A27 will not provide a solution to the overloaded single road on Hayling, particularly in light of proposals for further development on Hayling Island.</p>	<p>The Council will continue to support a new junction from the A27, unless evidence arises that this is not feasible. The Council has commissioned a Transport Assessment to assess further possible strategic highways infrastructure requirements, and will work with the Highway Authority and Highways England to consider which proposals offer the best solutions to traffic alleviation around the Borough, including Hayling Island.</p>
<p>Utilities (gas, electricity, water supply) cannot cope with extra demand</p>	<p>A key part of the drafting of the Local Plan is to identify the infrastructure needed to make the development of sites sustainable. Smaller items of infrastructure, which are needed to make a development work, will be funded by developers through legal agreements with the Council. These are generally delivered alongside the development, so they are operational when the development is occupied.</p> <p>In terms of strategic infrastructure, in a climate of extremely limited resources, forward funding of infrastructure is not always possible. However, having a plan in place will allow the Council to bid for funds for strategic infrastructure in order to bring these forward at the earliest opportunity.</p> <p>Throughout the Local Plan preparation process, the Council is also in continuous dialogue with the providers of</p>

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	<p>infrastructure, such as utility companies, Hampshire County Council for highways and schools, and the NHS. It should be noted, however, that it is the responsibility of these bodies to bring forward the infrastructure they deem necessary to meet the needs of the population.</p>
<p>The health centre and GP facilities need improving. Facilities are full and it is very difficult to get an appointment.</p>	<p>The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the Clinical Commissioning Group and the NHS to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.</p>
<p>Better facilities are needed for young people.</p>	<p>While the planning system can allocate land for certain types of development, the extent to which a particular use takes place on a site, is largely market led. A number of discussions have taken place over the years regarding the provision of a cinema and other leisure uses in the Borough. However, given the proximity to facilities in neighbouring cities such as Portsmouth and Chichester, providers have determined that there is not the market for a cinema in the Borough.</p> <p>However, if opportunities do arise and the Council is able to help enable the provision of facilities for young people, particularly on Hayling Island, the Council will assist where appropriate.</p>
<p>Concerns over the impact on ecology. Brent Geese, Slow Worms, Stag Beetles and Crested Newts have all been seen on various greenfield sites on the island.</p>	<p>No overriding issues have been identified that would prevent allocation from coming forward. However, it is acknowledged that development of greenfield sites could have some impact on wildlife on the sites affected. Nonetheless, the Council will continue to follow national policy and the appropriate regulations regarding the protection of species. The Council is having ongoing discussions with bodies such as Natural England, the RSPB and the Hampshire and Isle of Wight Wildlife Trust to identify any key issues and ways in which impacts can be mitigated.</p> <p>More detail on these matters will also be required to support any planning application on the sites, so that impacts and proposed mitigation measures can be considered in detail.</p> <p>The site is designated uncertain for Brent Geese and waders and Policy DM23 of the HBLP (Allocations) applies. This policy requirement will be considered through the Havant Borough Local Plan 2036. Three years worth of survey data is required to determine the importance of the site, to the satisfaction of Natural England.</p>
<p>Concerns over the loss of agricultural land, including Grade 1 Farmland at</p>	<p>The NPPF expects local planning authorities to seek to use areas of poorer quality land in preference to that of a higher quality, where significant development of agricultural land is demonstrated to be necessary. However a balance must be struck with the requirement to meet identified housing needs in the Borough. Some loss of higher quality land cannot</p>

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Station Road.	therefore be avoided in Havant Borough.
Negative impact on the character of the area and the loss of natural beauty and rural character.	The Council acknowledges that further development will affect the character of the area. However, the Council is committed both to delivering further housing, as well as to ensuring that quality of life remains high. The Council will continue to have regard to the findings of the Landscape Character Assessment and seek to locate development where there is the greatest capacity for landscape change.
400 homes at Rook Farm is unsustainable.	Figures provided at this stage are indicative. The Council will continue to work with developers, statutory undertakers and the community as proposals progress, to enable sustainable schemes to come forward.
Concerns over the impact of new out of the town shopping centre in Havant, on travel on and off the island.	<p>Attractive retail provision in Havant will undoubtedly act as a draw to residents across the Borough and forms an important part of the offer available to residents and visitors.</p> <p>The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. This may include exploring opportunities for better retail provision on the island. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport to assess and provide solutions to any capacity issues in the network.</p>
Lack of employment and alternative modes of transport mean that people drive on and off the island.	The Council is committed to retaining and where possible, creating employment sites throughout the Borough. Appropriate sites will continue to be allocated in the new local plan. However, the Council also recognises the residents' concerns regarding employment on Hayling Island and will continue to explore opportunities for greater provision, such as that currently being developed on Station Road. In addition, patterns of travel will be assessed as part of the full plan Transport Assessment to ascertain whether there are any mitigation measures which can be incorporated into the plan.
Concerns over road safety due to the quality and quantity/lack of pavements.	As proposals progress, the Planning Policy Team will continue to work with the Council's Development Engineer and the Highway Authority, to identify and mitigate the effects of development which impact on road safety.
Reference to comments made at Goldring Appeal.	While comments made during the Goldring Close Appeal remain valid, addressing housing need is not something which can be ignored. If the Council does not continue positively planning for the future, the Government will take that role out of the Council's hands and their overarching aim is to get more homes built. The Council therefore considers that the

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	<p>best way forward is to accept what cannot be changed: that there is a high housing need and that the NPPF requires local authorities to seek to meet that need. From this starting point, the Council can then focus on the detailed aspects to make sure that the development that does take place is sustainable and well-integrated into local communities and provides the infrastructure that is needed to support it.</p>
<p>A greater proportion of development is being allocated to Hayling Island than elsewhere in Borough.</p>	<p>In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. The <a href="#">Housing Constraints and Supply Analysis</a> identified sites suitable for development. The Council has an obligation to meet housing need for the Borough and this need should be met by sites which are suitable, not by proportioning development between the five areas.</p>
<p>The Hayling Billy Trail needs upgrading.</p>	<p>The Council recognises that improvements can be made to the Hayling Billy Trail, which would help improve its attractiveness not only as a leisure route, but also for active travel and commuting. The Council will continue to explore opportunities for funding to help make these improvements, through developer contributions and grant funding.</p>
<p>The closure of the waste facility on Hayling Island means that residents need to travel off the island for waste recycling facilities.</p>	<p>Household Waste Recycling Centres are operated in the Borough by Veolia on behalf of Hampshire County Council. In early 2016, HCC carried out consultation with all stakeholders including local authorities and residents. Hayling residents raised concerns that sites may shut down. However this was not the case and the site at Fishery Lane remains open, although there are new operating procedures.</p>
<p>More development will increase parking on roads.</p>	<p>Havant Borough Council (HBC) will continue to consult the evidence-base standards set out in the Parking SPD (July 2016):</p> <p><a href="http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary">http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary</a></p> <p>This policy requirement will be considered further through the Havant Borough Local Plan 2036.</p>
<p>Better facilities are required for cyclists to encourage use. Cyclists currently use the roads which adds to congestion.</p> <p>There are no cycle facilities in the</p>	<p>The Council recognises that improvements can be made to the Hayling Billy Trail, which would help improve its attractiveness not only as a leisure route, but also as a cycle commuting route. The Council will continue to explore opportunities for funding to help make these improvements, through developer contributions and grant funding.</p> <p>The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed, including cycle provision. The Council</p>

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north of the island.	will continue to work with the County Council as highway authority, as well as Highways England and providers of public transport, to assess and provide solutions to any capacity issues in the network.
Concerns over the impact of demographics. A high proportion of older people on the island increases pressure on the health centre. Post hospital care not sufficiently funded	The Council is working closely with the South East Hampshire Clinical Commissioning Group (CCG) to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.
No thought to decreasing emissions to tackle climate change.	<p>The operational carbon emissions and energy requirements of new homes are not aspects that the planning system can influence anymore; this is the remit of the Building Regulations.</p> <p>In terms of emissions from extra traffic from new development, the Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as highway authority, as well as Highways England and providers of public transport to assess and provide solutions to any capacity issues in the network. This work will also highlight any opportunities to reduce emissions and help tackle climate change, through new or improved alternative modes of transport.</p>
Consideration should be given to developing other areas e.g. unused industrial areas and brownfield sites such as New Lane, Havant.	Urban areas, including New Lane, Havant, have been considered. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the <a href="#">Housing Constraints and Supply Analysis</a> . The Core Strategy and Allocations documents remain in place and identify brownfield sites for development, and Guiding Principle 3 confirms that previously developed sites will be considered positively. It is not possible, however, to meet the Borough's housing need on brownfield sites alone.
Open space is needed.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. However, the Council is keen to ensure that where possible, high quality, new open space is incorporated within the design and the layout of new developments.
New homes should be for those in	New development is expected to provide between 30% and 40% affordable housing. This can be in a variety of formats

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genuine housing need.	and will usually be determined in accordance with the Council's Housing Service and with affordable housing providers. The Council is not in a position to control the prices developers demand for homes. The Council can, however, try to improve the supply of new homes by identifying sites suitable for development. It can also seek a proportion of <a href="#">affordable homes</a> (Social rented, affordable rented and intermediate housing) in developments.
Concerns over emergency access and provision, given that the fire and police station have closed.	The Council consult with the emergency services on major development proposals. As the Local Plan progresses, the Council will continue to work with these services to help identify need. However, the provision and location of fire, ambulance and police stations is the responsibility of the emergency services and not the Council.
How will emergency access be achieved if the bridge is closed?	The Council has liaised closely with the South Coast Ambulance Service to understand provision of services in the event that the bridge is closed. Hayling Island has a number of first responders, who are able to attend in emergency situations. In addition, both air and sea rescue facilities exist, which can be used if a road vehicle is unable to get to the island.
Concerns over the impact on schools.	The Council is aware of residents' concerns regarding education provision. The Council is working closely with Hampshire County Council as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.
Can the Council stop homes being bought as second/holiday homes?	The planning system is unable to influence who purchases a property.
The plan should consider specialist accommodation for the over 60s.	The Council seeks to offer a range of house types, to cater for all demographics, through the allocation of a range of development sites. However, the provision of specialist housing is largely market led. Notwithstanding this, in recent years Hayling Island has seen a number of retirement developments, broadening the offer available.
Concerns over the impact on Chichester and Langstone Harbour.	The Council is working closely with Natural England, the Langstone Harbour Board and Chichester Harbour Conservancy to assess and where appropriate, mitigate the effects of development on these areas. However, both harbours are subject to a number of environmental designations, which afford a high level of protection, notwithstanding

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	future development.
Havant Borough Council has not estimated future car use on and off the island correctly.	The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as highway authority, as well as Highways England and providers of public transport, to assess and provide solutions to any capacity issues in the network.
There are sewerage issues in Selsmore Road.	No greenfield development is proposed within the vicinity of Selsmore Road and therefore, issues cannot be addressed as part of the consultation on the Housing Statement. Any existing issues should be addressed through Southern Water in the first instance.
Concerns over the impact of noise, dirt and pollution during the construction phase.	As with all planning applications, if development was to take place, the developer would be requested by Havant Borough Council (HBC) to advise the Environmental Health Pollution Team of HBC as to what measures would be put in place for the control of any dust that might emanate from the development site. This is in order to protect the occupants of nearby residential properties from dust pollution.
Public transport is unable to cope. There is an unreliable and infrequent bus service. Even the 15 minute service is struggling to cope.	The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport to assess and provide solutions to any capacity issues in the network.
Sites allocated in the plan now will be built in next 5 years, generating even more demand by 2036.	The Council has an obligation to address its OAN up to 2036. It is not yet known what the housing requirements will be beyond this period.
The population increases significantly over the summer months, leading to increased congestion.	The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport to assess and provide solutions to any capacity issues in the network. It is expected that the impact of summer traffic will be considered as part of this assessment.

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<p>Concerns over bridge safety, particularly as the bridge carries the weight of utilities (pipes, cables) as well as cars.</p> <p>HCC statistics show that 25-27,000 vehicles are now crossing the bridge per day, whereas it was only built for 9000 crossings per day.</p>	<p>Hayling Bridge is the responsibility of Hampshire County Council as Highway Authority and is subject to appropriate maintenance.</p>
<p>New housing alone does not create communities.</p>	<p>The Housing Statement is the first step in producing a new Local Plan and focuses specifically on housing. However, as the plan develops, other aspects such as open space, green infrastructure, employment, retail and community provision will be incorporated to help enable sustainable communities develop.</p>
<p>The character of the rural/urban fringe is changing.</p>	<p>The Council acknowledges that further development will affect the character of the area and that previously rural areas will become more urbanised. However, the Council is committed both to delivering further housing, as well as to ensuring that quality of life remains high. The Council will continue to have regard to the findings of the Landscape Character Assessment and seek to locate development where there is the greatest capacity for landscape change.</p>
<p>Have marine plans been taken into account?</p>	<p>Many of the objectives set out in the South Marine Plan Areas Options Report correspond with Council Objectives, for example Objectives 14 and 15: Promotion of activities which improve socio-economic conditions and support for opportunities for employment, investment, regeneration. It is expected that as both plans progress, greater alignment and cross reference will occur. Officers from Havant Borough Council, through the Solent Forum, will continue to play an active role in the development and implementation of the South Central Inshore and Offshore Marine Plans.</p>
<p>Are Hampshire County Council content with the proposals?</p>	<p>Hampshire County Council have been consulted on the proposals, particularly in respect of education and transport. Where appropriate, HCC have commented on the proposals and HBC will consider these comments as proposals develop. Havant Borough Council will continue to work closely with HCC as the plan progresses.</p>
<p>Has Southern Water agreed that there is capacity within the sewerage</p>	<p>The Council has worked closely with Southern Water, whom has not raised any objections to the proposals. As with the adopted Allocations Plan, where appropriate, development requirements will be included to ensure connection at the</p>

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system?	nearest point of capacity.
The Council should consider a 30mph speed limit in Northney to stop the area being used as a 'rat run'.	Comments made regarding specific roads and junctions will be considered further as the Local Plan is progressed. Any improvements deemed necessary will be set out in the development requirements for each site.
The plan should consider car ferry to Eastney.	The introduction of a car ferry to Eastney is not practical. High costs are a significant factor in the development of a ferry as well as significant shore infrastructure and changes to the nearby highway network. In addition, a car ferry departing from the Sinah Area would attract a large number of vehicles to one of the most sensitive parts of the island, where there are a large number of environmental and nature conservation designations.
Have the emergency services been consulted over the plans?	To confirm, the Emergency Services have been consulted.
Why not use vacant dwellings to meet housing need?	<p>Housebuilding is one of the Government's top priorities, and the NPPF makes clear that local plans should meet the full OAN for their area. Even with the use of all vacant buildings in the Borough, the full OAN will not be met by a large distance.</p> <p>The recent Government figures outlined 985 vacant dwellings in Havant Borough in 2015. Nevertheless, of these 985, only 248 dwellings are considered as 'long-term vacants'; i.e. vacant for longer than 6 months. Local Authorities have limited power to intervene in relation to private land. The remaining 737 vacant dwellings are the result of the natural housing market flow (i.e. people moving home, individuals passing away etc.).</p>
Concerns over quality of life, views, amenity and privacy.	The views of some properties will be affected by the development of sites allocated in the Housing Statement. The planning process is not able to protect views. However, the design and layout of future development will be required to consider the amenity (including privacy) of existing residents.
Developers should sell land to those offering community services, not housing.	Landowners will usually only offer land for development if sufficient profit can be achieved. The highest profit will usually be obtained through residential development. The NPPF requires that the Borough Council assume reasonable profit for developers and landowners when assessing the deliverability of sites. The Council cannot insist that land is sold for community purposes, but where appropriate, can seek to achieve community facilities in association with residential

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	development through developer contributions (S106 and CIL).
Hayling Island is capable of meeting future housing need together with associated infrastructure. There are, benefits associated with this location, due to its proximity with Portsmouth.	Noted. However, at this point, the Council believes that further work is required regarding highway capacity and infrastructure provision before greenfield sites are allocated for residential development on Hayling Island.
The Council should consider shared pedestrian/cycle routes as in Germany.	The design and layout of developments will be considered further as proposals progress. However, the Council is committed to maximising opportunities for walking and cycling throughout the Borough.
The presence of Brent Geese has not been adequately assessed.	Where a site is designated uncertain for Brent Geese and waders, Policy DM23 of the HBLP (Allocations) applies. Three years of survey data is required to determine the importance of the site, to the satisfaction of Natural England.
<p>Infrastructure is needed before development can take place. The role of S106 should be fully explored.</p> <p>The Council promised a full infrastructure review as part of the Goldring application/appeal, but this has not happened.</p>	<p>A key part of the drafting of the local plan is to identify the infrastructure needed to make the development of sites sustainable.</p> <p>Smaller items of infrastructure, which are needed to make a development work, will be funded by developers through legal agreements with the Council. These are generally delivered alongside the development, so they are operational when the development is occupied.</p> <p>In terms of strategic infrastructure, in a climate of extremely limited resources, forward funding of infrastructure is not always possible. However, having a plan in place will allow the Council to bid for funds for strategic infrastructure in order to bring these forward at the earliest opportunity.</p> <p>Throughout the local plan preparation process, the Council is also in continuous dialogue with the providers of infrastructure, such as utilities companies, Hampshire County Council for highways and schools, and the NHS. It should be noted, however, that it is the responsibility of these bodies to bring forward the infrastructure they deem necessary to meet the needs of the population. Moving forward, a Borough-wide Infrastructure Delivery Plan will be developed to assess infrastructure needs.</p>
Caravan parks should be used for	The characteristics of caravan parks are often such that they are not suitable for permanent accommodation – building

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permanent housing.	structure, room sizes, washing facilities. In addition, caravan parks on Hayling Island are an important attraction for visitors, boosting the local economy; their loss should be resisted.
Concerns over the impact on nearby hospitals.	The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the Clinical Commissioning Group and the NHS to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.
Concerns over the closure of community facilities including pubs, night clubs, hotels and leisure facilities.	Through Local Plan policies, the Council seeks to protect community facilities wherever possible. Where land or a building is no longer required for its original purpose, policies exist to ensure opportunities for other uses are considered before it is permitted for a non-community use. However, the Council cannot insist a community use remains in business where it is no longer profitable or viable.
Concerns over the Oysters development in West Town due to disruption during construction and site specific flooding issues.	It is acknowledged that there will be some disturbance during the construction phase. However, this is not considered a valid reason to prevent development from coming forward. Any concerns regarding a specific site should be raised with the developers or the Council's Development Management Team, as should site specific flooding issues.
The community needs time to create a Neighbourhood Plan.	The progress of the Local Plan cannot be delayed as it is likely that planning applications will be submitted for the proposed developments without an appropriate, positive framework in which to assess them and secure the required supporting infrastructure. However, the Council does support the production of Neighbourhood Plans and where appropriate, will work with communities to progress these.
No Sustainability Appraisal (SA) has been produced.	A full SA has been produced to support the Housing Statement: <a href="http://www.havant.gov.uk/localplan/regulatory-requirements">http://www.havant.gov.uk/localplan/regulatory-requirements</a>
A single access at Station Road and Rook Farm is not acceptable.	Comments made regarding specific roads and junctions have been noted and will be considered further as the Local Plan is progressed. Any improvements deemed necessary will be set out in the development requirements for each site.

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<p>There were no comprehensive plans at the public exhibitions.</p>	<p>The Housing Statement is the first stage in the preparation of the Havant Borough Local Plan 2036. At this stage, site allocations are intended to show where new development can go. The purpose of the exhibitions was to consult on these proposed allocations, not detailed proposals. There will be further opportunities to comment on proposals as the plan progresses, during which, further detail may become available. However, it is not expected that detailed proposals will be available until a planning application is submitted.</p>
<p>Houses sell to people outside Hayling Island.</p>	<p>The planning system cannot influence who buys houses.</p>
<p>There are sink holes in Rails Lane, Hayling Island.</p>	<p>This is outside the scope of the Housing Statement Consultation.</p>
<p>The value of existing homes will decrease.</p>	<p>This is not a planning consideration.</p>
<p>Houses should be provided which tempt people to downsize and free up housing space elsewhere.</p>	<p>The Council seeks to offer a range of house types, to cater for all demographics, through the allocation of a range of development sites. However, the provision of a particular type of housing is largely market led. Notwithstanding this, in recent years Hayling Island has seen a number of retirement developments, broadening the offer available and making downsizing a realistic option.</p>
<p>The propensity for retirement homes does not achieve balance.</p>	<p>The Council seeks to offer a range of house types, to cater for all demographics, through the allocation of a range of development sites. However, the provision of a particular type of housing is largely market led. Notwithstanding this, in recent years Hayling Island has seen a number of retirement developments but this has been balanced against an increase in non-retirement housing as well.</p>
<p>Concerns regarding dangerous parking around Mill Rythe School.</p>	<p>The Council acknowledges the difficulties arising from parking close to schools. Work is ongoing to try and improve the situation by raising awareness of the dangers involved and by providing alternative methods of transport to schools.</p>
<p>Concerns over the design of new development, particularly regarding</p>	<p>Any plans associated with a particular development are at this stage, indicative unless a full planning application is submitted. As proposals progress, the Council will work with developers to ensure appropriate densities and high</p>

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density and the lack of open space	quality, useable open spaces are provided. Given the high housing need in the Borough, the Council is required to ensure the efficient use of all new development sites, while creating sustainable communities with appropriate open space and amenities.
Why are houses being built for young people if they have to leave the island for employment?	The Council is committed to retaining and where possible, creating employment sites throughout the Borough. Appropriate sites will continue to be allocated in the new local plan. However, the Council also recognises the concerns of residents regarding employment on Hayling Island and will continue to explore opportunities for greater provision. In addition, patterns of travel will be assessed as part of the full plan Transport Assessment to ascertain whether there are any mitigation measures which can be incorporated into the plan.
The current situation is particularly bad for pedestrians in the Stoke Area on Hayling Island.	Infrastructure improvements can be required to support new development, but new development cannot be expected to correct existing deficiencies. As no new development is planned in the Stoke Area, it will not be possible to improve the footpaths through contributions raised by development in the Housing Statement.
There are very few useful shops on Hayling Island (clothing, shoes, furniture)	The planning system cannot determine the type of occupier in a retail unit.
Why wasn't the Hayling Island constraints paper published?	The findings of the Hayling Island constraints paper have been incorporated into the Havant Borough Housing Constraints and Analysis Paper: <a href="https://www.havant.gov.uk/sites/default/files/documents/Housing%20Constraints%20and%20Supply%20Analysis%20-%20FINAL.pdf">https://www.havant.gov.uk/sites/default/files/documents/Housing%20Constraints%20and%20Supply%20Analysis%20-%20FINAL.pdf</a>
There is a bottleneck at Langstone (The Langbrook and industrial estates)	The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport, to assess and provide solutions to any capacity issues in the network.
The proposals will result in an increase in crime and anti-social	It is not clear why an increase in housing on Hayling Island would have a direct impact on levels of crime and anti-social

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behaviour	behaviour.
Has there been/will there be a survey to assess the drainage of surface water?	The Housing Statement represents the first stage in the preparation of the Havant Borough Local Plan 2036. The NPPF states that evidence to support the plan should be proportionate to the stage of the plan process. It would not be reasonable at this stage to expect a full assessment of site conditions. However, appropriate levels of survey and assessment will be required to support the site allocation as it progresses through the local plan process and as part of any planning application submitted.
<b>Key issues raised by statutory consultees</b>	<b>HBC response</b>
<b>Environment Agency:</b>	
Concerns over flooding - access/egress Hayling Island and impact given lack of services on Hayling Island.	<p>Havant Borough Council has worked with the Environment Agency to consider the impact of flood risk on future development, specifically around the access points either end of Langstone Bridge. Future predictions show that flooding at either end of the bridge is likely to increase over time unless new flood defences are put in place.</p> <p>The Council considers that it is appropriate to consider this issue further and work with the Environment Agency and the Eastern Solent Coastal Partnership, before allocating any greenfield sites for development on Hayling Island. For this reason, it is proposed to remove all Hayling sites from Table 2 in the Housing Statement (see below) and not earmark them for early release.</p>

<b>Proposed Modifications to the Housing Statement</b>		
<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Guiding Principle 4: Table 2.	Delete sites from Table 2.	<p>Consultation on the Housing Statement has demonstrated that key issues regarding new development on Hayling Island remain unresolved. These include flooding, highway capacity, the single access over the bridge, health, education and the provision of utilities.</p> <p>Further work is required to determine the full extent of these issues and whether they can be resolved, facilitating further development on Hayling Island. Until the Council has a further understanding of these issues, reference to all the Hayling Island sites in Table 2 will be deleted and they should not be earmarked for early release.</p>

## Rook Farm General

36 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
The junction of St Marys Road/Church Road and Tournurbury Lane is already busy, leading to concerns over road safety, particularly for school children.	The Council will continue to support a new junction from the A27, unless evidence arises that this is not feasible. The Council has commissioned a full plan Transport Assessment to assess further possible strategic highways infrastructure requirements, and will work with the Highway Authority and Highways England to consider which proposals offer the best solutions to traffic alleviation around the Borough.
Concern that the A3023 and the Hayling Bridge are the only access routes onto/off the island. Congestion will get worse with the proposed development.	<p>Comments made regarding specific roads and junctions will be considered further as the Local Plan is progressed. Any improvements deemed necessary will be set out in the development requirements for each site.</p> <p>The Council acknowledges that there is only a single point of access onto and off Hayling Island. Further work is required to understand traffic movements in this respect. Following consultation on the Housing Statement, it is clear that this is one of the key issues for residents on the island. It is considered appropriate given the strategic nature of the A3023 link that the Hayling Island Sites not be earmarked for early release.</p>
Resident suggests that a bridge is constructed from the west of the island to Portsmouth.	Langstone Harbour is subject to a number of environmental designations. These constraints, together with the high cost of a new bridge linking the island to Portsmouth, mean that this is unlikely to be a realistic option in terms of feasibility and viability. It should also be noted that any access on/ off the island in the Sinah area will undoubtedly increase traffic pressures in this area.
The Rook Farm sites are used by Brent Geese.	Part of the site is designated uncertain for Brent Geese and Waders and Policy DM23 of the Local Plan (Allocations) applies. This policy will be considered further through the Havant Borough Local Plan 2036. Three years worth of survey data is required to determine the importance of the site, to the satisfaction of Natural England.
Concerns over flooding as fields have drainage ditches and water courses for excess rainfall to filter out of area. Development will lead to localised flooding if these ditches and courses are removed or altered.	It is not expected that any part of the site which lies within Flood Zones 2 or 3 will be developed. Flooding and drainage will be considered as proposals develop and it is expected that appropriate mitigation will be proposed in accordance with national and local flood risk policies.

## Rook Farm General

36 responses were received regarding this topic

### Consultation Responses

Concerns over the capacity of the sewage system.	Southern Water has been consulted on all the proposals in the Housing Statement. No objections have been raised. A development requirement for connection to the sewerage system at the nearest point of adequate capacity may be required.
Concerns over utilities, particularly water pressure, which is too low on Hayling Island.	The Council is currently consulting with Portsmouth Water regarding water pressure on Hayling Island. However, at this stage, it is not considered that this is a valid reason to delay/avoid the allocation of sites on Hayling Island.
Concerns over gas and electricity supply to the island.	The Council is aware of the residents' concerns regarding utilities provision. Utility providers (water, gas, electricity) have a statutory obligation to provide services to new development. The Council works with these providers to ensure they are aware of proposed levels of development so that they can plan accordingly.
There is insufficient infrastructure on Hayling Island.	In addition, concerns have been raised regarding highway, flood defence, education and health infrastructure. Again, the Council is working with infrastructure providers to address these concerns. Given that the provision of infrastructure is one of the key concerns raised as part of the Housing Statement consultation, it is proposed to delay the allocation of sites on Hayling Island, in order that the Council can carry out further work on infrastructure provision.
More trips are being made to Havant to dispose of rubbish.	Household Waste Recycling Centres are operated in the Borough by Veolia on behalf of Hampshire County Council. In early 2016, HCC carried out consultation with all stakeholders including local authorities and residents. Hayling residents raised concerns that sites may shut down, however this was not the case and the site at Fishery Lane remains open, although there are new operating procedures.
Concerns over the loss of agricultural land.	The NPPF expects local planning authorities to seek to use areas of poorer quality land in preference to that of a higher quality, where significant development of agricultural land is demonstrated to be necessary. However a balance must be struck with the requirement to meet identified housing needs in the Borough. Some loss of higher quality land cannot therefore be avoided.
Concerns over the loss of green space.	In order to address the Borough's housing need, it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. However, the Council is keen to ensure that where possible, high quality, new open space is

## Rook Farm General

36 responses were received regarding this topic

### Consultation Responses

	incorporated within the design and the layout of new developments.
Concerns over the impact on ecology. The presence of foxes, bats, deer, voles, shrews, field mice and wild birds is noted.	No overriding issues have been identified that would prevent allocation from coming forward. Whilst some of the species are afforded legal protection, there are generally mitigation measures available which mean that development can be accommodated without an adverse effect on the species in question. More detail on these matters will be required to support a planning application.
Concerns over emergency access.	The Council will continue to work with relevant services (Building Control, Highway Authority and where appropriate, the Emergency Services) to ensure new development meets the required standards. However, as the design and layout of the proposals is yet to be determined, it is not possible at this stage to provide any more detail in respect of this.
Residents on Hayling Island already have long waiting times for GP appointments.	The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the Clinical Commissioning Group and the NHS to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.
Concerns over the impact on schools and nurseries.	The Council is aware of residents' concerns regarding education provision. The Council is working closely with Hampshire County Council as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.
Concerns over the provision of fire, ambulance and police services.	The Council has liaised closely with the South Coast Ambulance Service in respect of the proposals on Hayling Island, particularly surrounding any flood risk issues. No objections have been raised. As proposals progress, the Council will continue to consult with the emergency services.
Green field sites should not be built on. Brownfield sites should be considered instead.	Urban areas, including Havant Town Centre and sites on Hayling Island have been considered and brown field sites are included as allocations in the Adopted Local Plan. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the <a href="#">Housing Constraints and Supply</a>

## Rook Farm General

36 responses were received regarding this topic

### Consultation Responses

	<p><a href="#">Analysis.</a> The Core Strategy and Allocation Plan documents remain in place and identify brownfield sites for development. Guiding Principle 3 confirms that previously developed sites will be considered positively. It is not possible, however, to meet the Borough's housing need on brownfield sites alone.</p>
Concerns over the erosion of the green belt between Elm Grove/Mengham and West Town and the encouragement of further development stretching to Sandy Point.	The Council does not have a policy to protect gaps. However, development requirements on site layout will be included in the site allocation in the Local Plan to ensure that the development does not result in the coalescence of distinct settlements.. There is no designated greenbelt in Havant Borough.
Concerns over fumes and pollution from traffic near schools.	The Council promotes alternative means of transport wherever possible. The capacity of the road network on Hayling Island has been a key concern of residents during the consultation on the Housing Statement (please see responses above for more detail).
New cycle routes are needed. The old bridge could be used and Government grants should be considered.	<p>The Council is keen to promote cycling on Hayling Island and throughout the Borough. A comprehensive cycle network already exists but the Council recognises that there are ways in which this can be improved. The Council's Civil Engineering and Landscape Team has been successful in securing grants to implement the provision and enhancement of cycle routes and will continue this work as the plan progresses.</p> <p>The provision of a second bridge to accommodate cyclists is likely to be a costly proposal, which would also be subject to numerous environmental constraints. However, the transport issues affecting Hayling Island are well known and the Council need to consider the best way in which to address this. Proposals to alleviate this issue will be considered as work on the plan progresses.</p>
There are other more suitable sites on Hayling Island. It seems that Brent Geese take preference over people.	<p>In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development.</p> <p>Brent Geese do have a high level of legal protection, which the Council cannot ignore. A large part of north Hayling is functionally linked to the Chichester and Langstone Harbour Special Protection Area. This, coupled with the extent to which sites have been promoted for development, is why large parts of north Hayling remain free from proposals for new housing.</p>
WW2 Ordnance was dropped at Rook Farm. Surveys will be	Survey work, where appropriate, will be carried out before development commences.

## Rook Farm General

36 responses were received regarding this topic

### Consultation Responses

required.	However, this is the responsibility of the developer and not something which the Council would carry out. However this will be highlighted in the development requirements.
Welcome support of allocation.	Noted.
The closure of services/shops on the island mean that people need to travel off Island.	It can be difficult for the planning system to influence the type and size of retail units in a particular location. However, an increased population is likely to provide increased demand for a better range of retail outlets. The Council will work with retail providers to explore opportunities for better retail provision.
The number of dwellings on the site is too high.	Any plans which have been submitted at this stage are indicative. As the local plan progresses, discussions with developers will continue to ensure an appropriate density. However, the high housing need in the Borough means that the Council will be working to ensure the efficient use of development sites.
Concerns over the impact on the grade 2 listed St Marys Church.	Any plans which have been submitted at this stage are indicative. However, it will be a development requirement the layout and design of any future development has regard to the listed building itself and it's setting. Consultation with the Council's Conservation Officer will be essential.

**Proposed Modifications to the Housing Statement**

<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Guiding Principle 4: Table 2	Delete allocation from Table 2.	<p>Consultation on the Housing Statement has demonstrated that key issues regarding new development on Hayling Island remain unresolved. These include flooding, highway capacity, the single access over the bridge, health, education and the provision of utilities.</p> <p>Further work is required to determine the full extent of these issues and whether they can be resolved, facilitating further development on Hayling Island. Until the Council has a further understanding of these issues, reference to all the Hayling Island sites in Table 2 will be deleted and they should not be earmarked for early release.</p>
Local Plan	Development requirements to include the need to ensure that site is free from WWII Ordnance.	Potential for WWII Ordnance highlighted through the consultation.
N/A	No change – however concerns regarding specific junctions close to the development to be raised with the Highway Authority.	N/A.

**UE17: South of Rook Farm**  
3 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
<p>The area is already used as 'rat run' for West Town, Beach Road, Elm Grove and Church Road. The developments will generate additional traffic.</p>	<p>The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport, to assess and provide solutions to any capacity issues in the network.</p> <p>Comments made regarding specific roads and junctions have been noted and will be considered further as the new Local Plan is progressed. Any improvements deemed necessary will be set out in the development requirements for each site.</p>
<p>Parking on Cherrywood Gardens and St Mary's Road makes it dangerous to exit driveways.</p>	
<p>The area suffers from surface water flooding which will only be exacerbated with new dwellings. There is localised flooding in existing gardens. Where will the water drain to?</p>	<p>Flooding and drainage will be considered as proposals develop and it is expected that appropriate mitigation will be proposed in accordance with national and local flood risk policies.</p>
<p>Concerns over the impact on ecology/nature conservation. There is evidence of Brent Geese, deer, wild birds and bats in the area. The consultee would expect a bat survey to be carried out before any development is planned.</p>	<p>No overriding issues have been identified that would prevent the allocation from coming forward. More detail on these matters will be required as the proposal progresses, including any appropriate surveys. The Council will continue to follow the applicable regulations and national policy regarding protected species.</p> <p>Where a site is designated uncertain for Brent Geese and waders, Policy DM23 of the Local Plan (Allocations) applies. 3 years worth of survey data is required to determine the importance of the site, to the satisfaction of Natural England.</p>
<p>Concerns over the negative impact on the character of the area, which would affect the residents in the immediate vicinity and across Hayling Island. An increase in traffic would deter day trippers and holidaymakers.</p>	<p>It is inevitable that the character of the area will be altered by the proposed allocations. However, by planning in a comprehensive and co-ordinated manner, it is expected that key features including landscaping and open space can be incorporated into new proposals, resulting in better developments</p>
<p>There are not sufficient employment opportunities on the Island to cope with the volume of proposed new homes.</p>	<p>The Council is committed to retaining and where possible, creating employment sites throughout the Borough. Appropriate sites will continue to be allocated in the new Local Plan. However, the Council also recognises the concerns of residents regarding employment on Hayling Island and will continue to explore opportunities for greater provision.</p>

**UE17: South of Rook Farm**  
3 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
Concern over the impact on/provision of community facilities & services. Doctors surgeries and schools are already oversubscribed.	<p>The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the South East Hampshire Clinical Commissioning Group to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.</p> <p>The Council is aware of residents' concerns regarding education provision. The Council is working closely with Hampshire County Council as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.</p>
There are Insufficient supermarkets/shops on the island resulting in shopping being carried out elsewhere. This is generating more traffic.	<p>It can be difficult for the planning system to influence the type and size of retail units in a particular location. However, an increased population is likely to provide increased demand for a larger supermarket on the Island. The Council will work with retail providers to explore opportunities for better retail provision.</p>
<p>Concerns over the loss of Grade 2 Agricultural Land. Land should be maintained in farming use to meet the needs of an increasing population.</p> <p>This is fertile land used for growing crops. This year the field was ploughed and not planted until March/April and so far, there has been no flooding.</p>	<p>The NPPF expects local planning authorities to seek to use areas of poorer quality land in preference to that of a higher quality, where significant development of agricultural land is demonstrated to be necessary. However a balance must be struck with the requirement to meet identified housing needs in the Borough. Some loss of higher quality land cannot therefore be avoided.</p>

<b>Proposed Modifications to the Housing Statement</b>		
<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Guiding Principle 4: Table 2.	Delete allocation from Table 2.	<p>Consultation on the Housing Statement has demonstrated that key issues regarding new development on Hayling Island remain unresolved. These include flooding, highway capacity, the single access over the bridge, health, education and the provision of utilities.</p> <p>Further work is required to determine the full extent of these issues and whether they can be resolved, facilitating further development on Hayling Island. Until the Council has a further understanding of these issues, reference to all the Hayling Island sites in Table 2 will be deleted.</p>

**UE35: North of Rook Farm**  
2 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
The land was rejected for development in the last local plan. The reasons for rejection must still be valid?	Housebuilding is one of the Government's top priorities, and the NPPF makes clear that local plans should meet the full Objectively Assessed Need (OAN) for their area. Since the adoption of the Local Plan (Core Strategy) (2011), the OAN for Havant Borough has increased. In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development.
Concerns over the impact on ecology and nature conservation. Brent Geese use the site and there is evidence of deer, wild birds and bats in the area.	No overriding issues have been identified that would prevent the allocation from coming forward. More detail on these matters will be required as the proposal progresses, including any appropriate surveys.
Consultee would expect a bat survey to be carried out before any development is planned.	Where a site is designated uncertain for Brent Geese and waders, Policy DM23 of the Local Plan (Allocations) applies. This policy requirement will be considered through the Havant Borough Local Plan 2036. Three years worth of survey data is required to determine the importance of the site, to the satisfaction of Natural England.
Concerns over the loss of Grade 2 Agricultural Land. This land should be maintained in farming use to meet the needs of an increasing population.	The NPPF expects local planning authorities to seek to use areas of poorer quality land in preference to that of a higher quality, where significant development of agricultural land is demonstrated to be necessary. However, a balance must be struck with the requirement to meet identified housing needs in the Borough. Some loss of higher quality land cannot therefore be avoided.
Concerns over the capacity of the highway network and the creation of extra traffic.	The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport to assess and provide solutions to any capacity issues in the network.

**UE35: North of Rook Farm**  
2 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
<p>Concerns over flooding. This area suffers from surface water flooding, which will only be exacerbated with new dwellings.</p> <p>Where will the water drain to? Will existing properties be dramatically affected?</p>	<p>Flooding and drainage will be considered as proposals develop and it is expected that appropriate mitigation will be proposed in accordance with national and local flood risk policies.</p>
<p>Concerns over the impact on/provision of community facilities &amp; services. Doctors surgeries and schools are already oversubscribed.</p>	<p>The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the South East Hampshire Clinical Commissioning Group to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.</p> <p>The Council is aware of residents' concerns regarding education provision. The Council is working closely with Hampshire County Council as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.</p>
<p>There are insufficient supermarkets and shops on the island, resulting in shopping being carried out elsewhere. This is generating more traffic.</p>	<p>It can be difficult for the planning system to influence the type and size of retail units in a particular location. However, an increased population is likely to provide increased demand for a larger supermarket on the Island. The Council will work with retail providers to explore opportunities for better retail provision.</p>
<p>Concerns over the negative impact on the character of the area. This will affect the residents in the immediate vicinity and across Hayling Island.</p>	<p>It is inevitable that the character of the area will be altered by the proposed allocations. However, by planning in a comprehensive and co-ordinated manner, it is expected that key features including landscaping and open space will be incorporated into new proposals, resulting in better developments.</p>
<p>An increase in traffic would deter day trippers and holidaymakers.</p>	

**UE35: North of Rook Farm**  
2 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
There are not sufficient employment opportunities on the Island to cope with volume of proposed new homes.	The Council is committed to retaining and where possible, creating employment sites throughout the Borough. Appropriate sites will continue to be allocated in the new Local Plan. However, the Council also recognises residents' concerns regarding employment on Hayling Island and will continue to explore opportunities for greater provision.

**Proposed Modifications to the Housing Statement**

<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Guiding Principle 4: Table 2.	Delete allocation from Table 2.	<p>Consultation on the Housing Statement has demonstrated that key issues regarding new development on Hayling Island remain unresolved. These include flooding, highway capacity, the single access over the bridge, health, education and the provision of utilities.</p> <p>Further work is required to determine the full extent of these issues and whether they can be resolved, facilitating further development on Hayling Island. Until the Council has a further understanding of these issues, reference to all the Hayling Island sites in Table 2 will be deleted.</p>

**UE63: West of Rook Farm**  
1 response was received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
Concerns over the capacity of the highway network and the creation of extra traffic.	The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport, to assess and provide solutions to any capacity issues in the network.
Concerns over flooding. The area suffers from surface water flooding which will only be exacerbated with new dwellings. Where will the water drain to and will existing properties be dramatically affected?	Flooding and drainage will be considered as proposals develop and it is expected that appropriate mitigation will be proposed in accordance with national and local flood risk policies. These require that development should not increase flood risk elsewhere.
Concerns over Brent Geese. There is evidence of Brent Geese, deer, wild birds and bats in the area. The consultee would expect a bat survey to be carried out before any building is planned.	No overriding issues have been identified that would prevent allocation from coming forward and it is considered possible that avoidance and mitigation measures can be provided within the development. More detail on these matters will be required as the proposal progresses however.  Where a site is designated uncertain for Brent Geese and waders, Policy DM23 of the HBLP (Allocations) applies. This policy requirement will be considered through the Havant Borough Local Plan 2036. Three years worth of survey data is required to determine the importance of the site, to the satisfaction of Natural England.
Concerns over the negative impact on the character of the area. This will affect the residents of the immediate vicinity and across Hayling Island. An increase in traffic would deter day trippers and holidaymakers.	It is inevitable that the character of the area will be altered by the proposed allocation. However, by planning in a comprehensive and co-ordinated manner, it is expected that key features including landscaping and open space will be incorporated into new proposals, resulting in better developments.
There are not sufficient employment opportunities on the Island to cope with the volume of proposed new homes.	The Council is committed to retaining and where possible, creating employment sites throughout the Borough. Appropriate sites will continue to be allocated in the new Local

## UE63: West of Rook Farm

1 response was received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	Plan. However, the Council also recognises the concerns of residents regarding employment on Hayling Island and will continue to explore opportunities for greater provision.
Concerns over the impact on/provision of community facilities and services. Doctors surgeries and schools are oversubscribed.	The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the South East Hampshire Clinical Commissioning Group to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.
There are insufficient supermarkets/shops on the island resulting in shopping being carried out elsewhere. This generates more traffic.	<p>The Council is aware of residents' concerns regarding education provision. The Council is working closely with Hampshire County Council as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.</p> <p>It can be difficult for the planning system to influence the type and size of retail units in a particular location. However, an increased population is likely to provide increased demand for a larger supermarket on the Island. The Council will work with retail providers to explore opportunities for better retail provision.</p>

**Proposed Modifications to the Housing Statement**

<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Guiding Principle 4: Table 2.	Delete site from Table 2	<p>Consultation on the Housing Statement has demonstrated that key issues regarding new development on Hayling Island remain unresolved. These include flooding, highway capacity, the single access over the bridge, health, education and the provision of utilities.</p> <p>Further work is required to determine the full extent of these issues and whether they can be resolved, facilitating further development on Hayling Island. Until the Council has a further understanding of these issues, reference to all the Hayling Island sites in Table 2 will be deleted.</p>

## UE18: Station Road

38 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>Flooding – close to Flood Zones 2 and 3 – high water table due to clay.</p>	<p>The site lies within Flood Zone 1, although a number of consultees have noted regular winter flooding on the site, possibly due to the high water table and clay soils. Any site specific issues and constraints that can be mitigated will be set out in the development requirements in the new Local Plan and developers will be expected to demonstrate how these can be addressed.</p>
<p>Concerns over coastal erosion.</p>	<p>The site is located within proximity of the coast adjoining Langstone Harbour. However, properties along North Shore Road are situated between the site and the coastline, making it unclear how the development would have an impact on coastal erosion at this point.</p>
<p>Capacity of waste water network – question capacity and integrity with extra material from site</p>	<p>Southern Water has been consulted on all the proposals in the Housing Statement. No objections have been raised. A development requirement for connection to the sewerage system at the nearest point of adequate capacity may be required.</p>
<p>Impact on ecology including Brent Geese, impact on Hayling Billy Trail as a habitat and ecology of Langstone Harbour.</p> <p>Local habitation would be affected by ground works if these developments were to take place. One resident has submitted a table of all the different wildlife seen, it is divided into categories of birds, butterflies/moths, insects and other.</p>	<p>The site is designated uncertain for Brent Geese and waders and Policy DM23 of the Local Plan (Allocations) applies which will be reviewed through the Havant Borough Local Plan 2036. Three years worth of survey data is required to determine the importance of the site, to the satisfaction of Natural England.</p> <p>Prior to development, a full ecological survey would be required to establish the extent of wildlife on the site. The assessment would be expected to inform proposals and mitigation in respect of any species which are protected and would be affected by the proposals.</p>
<p>Busy junction onto Sinah Lane. Cars parked on Sinah Lane have the effect of making it a single carriageway.</p>	<p>The Housing Statement represents the first part of the local plan process. The NPPF states that evidence to support the plan should be proportionate to the stage of the plan process.</p>
<p>Has a traffic assessment taken place?</p>	<p>The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation</p>

## UE18: Station Road

38 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	measures are needed. The Council will continue to work with the County Council as Highway Authority, as well as Highways England and providers of public transport, to assess and provide solutions to any capacity issues in the network.
Concerns over road safety.	Comments regarding the suitability of pavements in the vicinity are noted and if appropriate, improvements to existing and/or new pavements could be required as part of the proposal.
Insufficient cycle provision on the island. Danger to cyclists and pedestrians where there are no (or narrow curb) areas on Station Road	The site is located within close proximity of the Hayling Billy Trail, which is part of the National Cycle Network. Comments have been received suggesting the existing surface does not make it suitable as a year round cycle route. New development is expected to make provision for infrastructure through CIL and site specific S106. If it is considered that there is a need for improvements to cycle routes, these will be considered as part of the planning process.
A single access into the site is proposed. The design should accommodate two way traffic and traffic calming.	Comments made regarding specific roads and junctions have been noted and will be considered further as the new Local Plan is progressed. Any improvements deemed necessary will be set out in the development requirements for each site.
More development on the island will impact the ability to get on/off the Island given the single access over the bridge.	The Council acknowledges that there is only a single point of access onto and off Hayling Island. Further work is required to understand traffic movements on and off the island. Following consultation on the Housing Statement, it is evident that this is one of the key issues for residents. The Council will be considering the best way to address these concerns through the new Local Plan.
Concerns over the quality, quantity and suitability of the pavements, particularly between Furniss Way and West Town shops.	New development is expected to make provision for infrastructure through CIL and site specific S106. If it is considered that there is a need for improvements to pavements associated with the development, these will be considered as part of the development process.

## UE18: Station Road

38 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Concerns over the loss of agricultural land and the/impact of Brexit on agriculture.	<p>It is too early to anticipate the impact on agriculture as a result of Britain's exit from the EU and it is not feasible to delay the production of the new Local Plan until further details emerge.</p> <p>Notwithstanding this, the NPPF expects local planning authorities to seek to use areas of poorer quality land in preference to that of a higher quality, where significant development of agricultural land is demonstrated to be necessary. However a balance must be struck with the requirement to meet identified housing needs in the Borough. Some loss of higher quality land cannot therefore be avoided.</p>
Concerns over the loss of green space on the island as a result of the proposed development.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. However, the Council is keen to ensure that where possible, new, high quality open space is incorporated within the design and layout of new developments.
Concerns over lack of health provision on the island. There are limited services and facilities and it can take a long time (several weeks) to get a GP appointment.	The Council is aware of residents' concerns regarding health care provision. The Council is working closely with the South East Hampshire Clinical Commissioning Group to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities.
Concerns over education provision. Is there enough capacity and adequate provision in existing schools?	The Council is aware of residents' concerns regarding education provision on Hayling Island. The Council is working closely with Hampshire County Council as the Local Education Authority to determine how these concerns can be addressed through the planning process. If appropriate, developer contributions will be sought for the provision of new/improved facilities. The County Council has assured HBC that it has already taken into account urban extension sites in terms of school place planning.
Concerns over the impact on utilities in general, as a result of	The Council is aware of the residents' concerns regarding utility provision. Utility providers (water, gas, electricity) have a statutory obligation to provide services to new development.

## UE18: Station Road

38 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
additional development.	The Council works with these providers to ensure they are aware of proposed levels of development so that they can plan accordingly.
Concerns over the impact on character of area. The development is not in keeping with the existing landscape character.	<p>The southern part of Hayling Island is characterised by a mix of landscape types, including developed areas, open space and coastline. Site UE18 (Station Road) is already developed on three sides. Although the Landscape Character Assessment (LCA) shows that the site is part of a wider area where the capacity for change is low/medium, the LCA does go on to say that contained development may be possible. The site itself is shown as the least sensitive landscape area within the wider parcel and therefore acceptable to change.</p> <p>While development of this site will alter the character of the area in this location, this has to be balanced against the need to meet housing need in the Borough.</p>
Concerns over the impact of development on the character of the Hayling Billy Trail, given that the route is so close to the proposed development.	The proximity of the site to the Hayling Billy Trail is seen as a positive attribute, contributing towards the sustainability of the site and providing an alternative mode of transport for future residents. Given that the route is intended for walking and cycling, the impact of extra use should not adversely affect the character.
Concerns over air quality/pollution/noise as a result of the proposed development.	As the site is located in an already developed part of the Island, it is not considered that development will have a significant impact.
Concerns over disturbance and pollution during the construction phase.	It is accepted that there will be some disturbance during the construction phase. However, this is not considered a valid reason to prevent development from coming forward.
Concerns over the impact on the amenity of the area.	The views of properties on Sinah Lane and North Shore Road will be affected by the development of this site. The planning process is not able to protect views; however, the design and layout of future development will be required to consider the amenity of existing residents.

## UE18: Station Road

38 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
North Hayling should be developed as well as, or instead, of this site.	In order to address the Borough's housing need it is inevitable that all undeveloped areas that are free from significant constraints need to be considered for development. Constraints analysis showed that North Hayling is significantly more constrained than southern Hayling, particularly by environmental designations; principally its use by waders and Brent Geese associated with the Solent Special Protection Areas. In addition, the Council is only able to consider land which has been promoted for development by the landowner. These two factors combined means that no suitable sites in north Hayling were identified.
Other sites should also be considered, for example the land adjacent Station Theatre, Pullingers and the Hayling Billy Pub.	Urban areas have been considered. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the <a href="#">Housing Constraints and Supply Analysis</a> .  The Core Strategy and Sites Allocations documents remain in place and identify brownfield sites for development, and Guiding Principle 3 confirms that previously developed sites will be considered positively. It is not possible, however, to meet the Borough's housing need on brownfield sites alone.
Concerns over emergency access, given that there is no police or ambulance station on the island.	The Council recognises the absence of facilities for those emergency services on Hayling Island and has been working with the South Coast Ambulance Service (SCAS) to ensure they are aware of the proposals outlined in the Housing Statement. Although there is no station on Hayling Island, the Island is served by a First Responder Unit. In addition, the Ambulance Service is able to respond to calls on the Island within prescribed timescales. However, the need for a base on the Island to act as a standby point, has been identified by SCAS and should be considered as part of the wider healthcare provision on the island, as proposals are taken forward.
Concerns over water pressure as water pressure on parts of the	The Council is currently consulting with Portsmouth Water regarding water pressure on Hayling Island. However, at this stage, it is not considered that this is a valid reason to

## UE18: Station Road

38 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
island is already too low.	delay/avoid the allocation of sites on Hayling Island.
Concerns over the provision of utilities as broadband and phone signals are already weak.	Broadband provision will continue to be provided under Part R of the Building Regulations, see links below: <a href="https://www.gov.uk/Government/consultations/new-part-r-of-the-building-regulations">https://www.gov.uk/Government/consultations/new-part-r-of-the-building-regulations</a>
The affordability of new dwellings is a concern. New dwellings at the Oysters development are not affordable at £245,000+.	New development is expected to provide between 30% and 40% affordable housing. This can be in a variety of formats and will usually be determined in accordance with the Council's Housing Service and with affordable housing providers.  The Council is not in a position to control the prices developers demand for homes. The Council can, however, try to improve the supply of new homes by identifying sites suitable for development. It can also seek a proportion of affordable homes (Social rented, affordable rented and intermediate housing) in developments.
Some homes backing onto the site are affected by a covenant not allowing development within 50ft of these dwellings.	This will need to be investigated further and considered as part of the design and layout of the site.
There is a requirement for an Environmental Impact Assessment and full compliance with national and international legislation.	Full compliance with national and international legislation will be required.
The site is suitable, available and achievable within next 5 years.	The Council accepts that there are certain aspects of this site which make it deliverable in the shorter term. However, there are still a number of wider issues affecting development on Hayling Island which remain unresolved. Any further development will put additional pressure on an already strained highway network, the impacts of flooding and the affect this has on the access to and from the Island need to be fully considered and the impact on services, infrastructure and utilities requires investigation.  For these reasons, the Council does not consider that the site should be considered for development ahead of the adoption of the new Local Plan and full consideration of these

## UE18: Station Road

38 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
	issues.

### Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
Guiding Principle 4: Table 2.	Delete site from Table 2.	<p>Consultation on the Housing Statement has demonstrated that key issues regarding new development on Hayling Island remain unresolved. These include flooding, highway capacity, and the single access over the bridge, health, education and utilities provision.</p> <p>Further work is required to determine the full extent of these issues and whether they can be resolved, facilitating further development on Hayling Island. Until the Council has a further understanding of these issues, reference to all the Hayling Island sites in Table 2 will be deleted.</p>

**Sites not in the plan**  
20 responses were received regarding this topic

**Consultation Responses**

Key issues raised by residents and other stakeholders	HBC response
<p>Object to <b>Land North of the A27</b> (UE02a) being excluded.</p> <p>Site of 4.35ha net could be developed for about 200 homes separately via the existing agricultural access or comprehensively with Land East of Castle Avenue (UE53 to the west). UE02a would be able to deliver housing within the first 10 year period, either in conjunction with UE53 or following completion of housing on that site. Site specific surface water strategy would be devised and wintering bird surveys undertaken.</p>	<p>This site lies to the south of the railway line and the proposed Denvilles-Emsworth Strategic Site. The strategic site will require a new access to the A27 which could have an impact upon site UE02a.</p> <p>This site is currently designated as an 'Uncertain Site for Brent Geese and/or Waders'. Surveys undertaken during the winters of 2012/13 and 2013/14 found no sightings of either Brent Geese or waders and so the area was not surveyed during winter 2014/15. Substantial areas of bare arable ground and pasture such as this have potential for roosting and foraging, depending on the level of disturbance. Further surveys will therefore be needed to confirm the status of the site for foraging and roosting habitat and the presence or absence of over-wintering birds. No data has been submitted to demonstrate that this constraint can be overcome.</p> <p>The site lies within the Hampshire Minerals and Waste Plan 'Minerals Consultation Area' where the potential for prior extraction before development will need to be investigated.</p> <p>The Landscape Capacity Assessment indicates this area (including UE53 to the west) to have 'medium' capacity for change. Although the gap between the settlements of Havant and Emsworth is narrowest at this point there is clear separation formed by the A27 which forms the divide and prevents coalescence. Detailed design and layout including open space can also maintain the distinctive character of settlements.</p> <p>The suggested scale of development would result in a density of 46 dwellings per hectare which is relatively high for an urban extension however areas for public open space and green infrastructure have been excluded from the gross area of 7.3ha.</p> <p>This site could be included in the pre-submission Havant Borough Local Plan 2036 and considered comprehensively with the land to the west (UE53 Land East of Castle Avenue). However, this will be subject to satisfactory evidence to demonstrate that the site is not used by Brent Geese and/or waders and the extent to which it may be affected by the A27 link to the Denvilles-Emsworth Strategic Site. Appropriate survey work will need to be undertaken therefore this should be considered as having potential for inclusion in the new</p>

**Sites not in the plan**  
20 responses were received regarding this topic

**Consultation Responses**

Key issues raised by residents and other stakeholders	HBC response
	Local Plan rather than for early release through the final Housing Statement.
<p>Other areas/sites should be developed:</p> <p>The resident does not understand why the whole of the area east of Castle Avenue (UE53) is not being developed, as well as the area south of the A27, north of the railway and east of North Street.</p>	<p>See above regarding land east of UE53.</p> <p>The area to the south of the A27, north of the railway and east of North Street has been considered as part of the strategic site between Denvilles and Emsworth.</p>
<p><b>Hazleton Woods</b> should be considered for development. It is a site on the edge of a built up area (to the north of Padnell Grange) within reasonable distance to facilities and amenities in Cowplain; it is not in a strategic gap. It was considered suitable in previous draft versions of the local plan but not allocated in favour of higher ranked sites which have since been developed. Whilst site is a Site of Importance for Nature Conservation (SINC) (designated by HBIC following survey in 2008) it is not considered to be of such ecological interest to withhold a housing allocation.</p> <p>Site includes areas of poor grassland mixed with scrub and used for some time for horse grazing. Landowner is willing to undertake full ecological survey. Site is subject to a Tree Protection Order (TPO) but scheme could be designed around trees and root protection areas. Suitable access can be achieved subject to agreement with other landowners.</p>	<p>The site lies between the rear of housing along Greenfield Crescent and the Borough boundary, being separated from Waterloo Golf Course by the Sheepwash Road Bridleway Track. The Landscape Capacity Assessment indicates this area to have 'medium/high' capacity for change but suggests leaving this area undeveloped as a buffer to the nature reserve and an open setting to the public right of way.</p> <p>A new survey would be required to confirm, or otherwise, the ecological quality of the site and the current relevance of the SINC designation and whether any development is possible given the Woodland Protection Order. This, together with the access being in third party control leads to a low prospect of the site being developable.</p>
<p>Other areas/sites should be developed - the residents suggest the <b>land to the south west of Emsworth on the Havant Road</b> which is adjacent to the motorway and so provides direct access. This would provide easy access to Havant, Emsworth and all of their amenities. Developing that land would have limited impact on the area. Easy access to motorway, as well as bus and rail links to</p>	<p>This area to the south of the A259, from Wade Court in the west to Emsworth in the east was considered for its development potential but subsequently discounted. It was considered by the Landscape Capacity Assessment to have low capacity to accept change. It includes areas of the high risk Flood Zone 3 with potential for inundation via the estuary watercourses so also lies within the defined Coastal Zone (Policy DM9). The whole area is indicated as having high quality agricultural soils (Grades 1 and 2) and lies within</p>

**Sites not in the plan**  
20 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
<p>other south coast destinations and London.</p> <p><b>Land West of Emsworth</b> (opposite Brookfield Hotel), Havant Road (UE11) is suggested by developer to help to meet needs of ageing population and should be considered as part of a comprehensive and detailed assessment of appropriate locations for development as part of a new Local Plan based on a reviewed spatial strategy. Technical surveys and advanced works have been undertaken in respect of the site to demonstrate its deliverability in the short term.</p>	<p>the Hampshire Minerals and Waste Plan Consultation Zone due to deposits of sharp sand and gravel. There are two Conservation Areas; at Wade Court and at Warblington Hamlet including the farmland surrounding the St Thomas a Becket's Church and remains of Warblington Castle (Scheduled Monument). Across the area there are some 'uncertain' sites and also one 'important' site for Brent Geese and waders.</p> <p>Immediately to the west of Emsworth and south of the Havant Road A259 is an area which is not identified for Brent Geese and waders. While most of UE11 is a SINC and a large part lies within the higher risk Flood Zone 2 and some Zone 3, the northern part of previously submitted site UE11 was resubmitted in the 2016 Call for Sites and is the subject of a representation on the Housing Statement. This northern section, Nore Farm Paddock, covers an area of 3.5ha. The owner's agent suggests a capacity of 120 dwellings at 35dph however capacity would be reduced by the presence of Flood Zone 2/3 on the eastern part and the need for SUDS. Capacity would therefore be more in the region of 50-100 dwellings. Importantly however it is within the Chichester Harbour Area of Outstanding Natural Beauty (AONB). It was not considered to be suitable for development, and was discounted within the Strategic Housing Land Availability Assessment (SHLAA) (July 2016) for this reason.</p> <p>Paragraph 115 of the NPPF states that 'great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty'. It goes on to say that these designations have the highest status of protection in relation to landscape and scenic beauty. It is considered that development of this area would have a detrimental impact on the quality of this important landscape.</p> <p>The technical surveys stated to have been undertaken by the developer have not been made available to HBC.</p>
<p>Other areas/sites should be developed:</p> <ul style="list-style-type: none"> <li>- in Emsworth, the horse's field opposite existing housing would be preferable, as it does not close the Havant/Emsworth Gap</li> </ul>	<p>See above. Part of larger UE11 that is not in the SINC.</p>

**Sites not in the plan**  
20 responses were received regarding this topic

**Consultation Responses**

Key issues raised by residents and other stakeholders	HBC response
<p>The site at <b>Southmere Field, Langstone Road</b> (UE54) should be included as a sustainable residential allocation in the Local Plan Housing Statement. Further information on site description, designations, flood risk, accessibility, Brent Geese (including extract from Havant Winter Bird Survey 2012-2015) and, pipeline provided with representation. The 3.7ha site is capable of delivering approximately 100-120 dwellings, within 5 years through a 2.5 year build programme.</p>	<p>This site is a meadow on the western side of Langstone Road.</p> <p>The Landscape Capacity Assessment indicates this area to have 'medium/high' capacity for change and suggests that most of the site is considered further for possible future growth.</p> <p>However it lies within an area that is 'uncertain' for Brent Geese and waders. It was assessed in the SHLAA (July 2016) with a capacity of 14-50 dwellings on 2.83ha but recorded as undevelopable as the Winter Bird Survey 2012-2015 found positive sightings of waders on part of the site.</p> <p>Highways issues will be considered further as the Local Plan is progressed. The Council has commissioned a full plan Transport Assessment to assess the impacts of the proposed development on the highways network, and establish what mitigation measures are needed.</p>
<p>Strongly oppose development at <b>Southmere Field, Langstone Road</b> (site UE54 in SHLAA). It is Grade 1 agricultural land (cattle grazing) which should be protected as per NPPF. Also concerns over the capacity of the highway network (A3023) and impact on Mill Lane Conservation Area.</p>	<p>Mill Lane Conservation Area adjoins the site to the south. Development will need to be designed sensitively, through the position, scale, orientation and density of buildings and through planting and open space, to minimise impact on the conservation area.</p> <p>The site lies within the Hampshire Minerals and Waste Plan 'Minerals Consultation Area' where the potential for prior extraction before development will need to be investigated.</p> <p>A gas pipeline crosses the site which does not preclude development but will reduce the capacity of the site as it requires an easement – area to be kept free of development.</p> <p>Conclusion: This site could be included in the final Local Plan Housing Statement; however, this will be subject to satisfactory evidence to demonstrate that the site is not used by Brent Geese and/or waders and the extent to which it may be affected by other constraints including the conservation area. Appropriate survey work will need to be undertaken therefore this should be considered as having potential for inclusion in the in the new Local Plan rather than for early release through the final Housing Statement.</p>

**Sites not in the plan**  
20 responses were received regarding this topic

**Consultation Responses**

Key issues raised by residents and other stakeholders	HBC response
<p><b>154 London Road, Waterloooville</b> (Goodwillies Timber Yard) (W63).</p> <p>Landowner wishes site to be included in new Local Plan. Site likely to be available in next 5-10 years and should be referred to as 154 London Road and not Goodwillies Timber Yard.</p>	<p>This site is currently allocated in the Local Plan (Allocations Plan) under Policy WA1, site reference W63 (Goodwillies Timber Yard), for 96 dwellings on an area of 3.37ha. It was, however, discounted in the SHLAA (July 2016) as 'unavailable' due to lack of evidence that the existing business intends to relocate or consolidate.</p> <p>This allocation can be carried forward into the new Local Plan 2036 and references to it amended to read 154 London Road.</p>
<p>Cowplain Evangelical Church is running out of space to accommodate worshippers and wider community activities at existing site (Durley Avenue). Church seeking expansion of existing site or new site. Suggest land at corner of <b>Grassmere Way and Tempest Avenue</b> (approx. 0.52ha). Understand that this is Council owned open space but not a high value open space. Land swap could facilitate development of part of the Mission Lane Car Park to the rear of the church, both physically and because demand/ use will decrease if the church moved away.</p>	<p>The Housing Statement will only identify sites suitable for residential development. However, sites for other uses will be considered as part of the update to the Local Plan. If the suggested land swap is feasible and viable then redevelopment of the vacated site and land to the rear will be looked at as part of the new Local Plan.</p>
<p><b>Gas site at Downley Road</b> should be allocated for residential/ retail development in the new Local Plan 2036. The site of about 0.29 ha is located within an established industrial location between New Road and Downley Road and has access from both roads. There are requirements associated with the previous use of the site to remediate the site upon cessation of use. The cost of this, including dismantling the disused gas holder, may result in significant costs which would require value from future land uses to fund this process. Redevelopment for alternative uses would remove the Health and Safety Executive Planning Advice for Developments near Hazardous Installations (HSE PADHI) Zone</p>	<p>Policy CS17 concentrates new development within the urban areas and protects existing employment sites (Policy DM3). This site (SHLAA site L150) has been considered but assessed as unsuitable for residential development due to being located within an employment/industrial area and separated from existing residential development. As Policy DM3 allows sites to be considered for other purposes where they are financially unviable for class B purposes, it will be looked at as part of the update to the Local Plan 2036. Brownfield sites within the existing urban area would not be identified in the Local Plan Housing Statement in any case.</p>

**Sites not in the plan**  
20 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
limitations on surrounding development opportunities.	
<b>Emsworth Holder Station, 69 North Street</b> , should be allocated for residential/retail development in the new Local Plan 2036. The site of about 0.4ha includes the disused gas holder which detracts from the amenity value of this part of the town. There are requirements to remediate the site the cost of which would require value from future land uses to fund these works. . Redevelopment for alternative uses would remove the HSE PADHI Zone limitations on surrounding development opportunities.	The site lies to the north of the Emsworth District Centre. It is bounded by a mix of industrial and residential properties on Seagull Lane to the north, North Street to the west and Palmer's Road to the south. The River Ems lies to the east and its flood plain overlaps the site. This site (SHLAA site EM42) has been considered and assessed as developable due to being located within a mixed employment/residential area and adjoining the District Centre. As Policy DM3 allows sites to be considered for other purposes where they are financially unviable for class B purposes, it will be looked at as part of the new Local Plan since brownfield sites within the existing urban area are not identified in the Housing Statement.
<b>L145 SSE Site, Bartons Road</b> is allocated for housing (90 dwellings) in Local Plan (Allocations). However, a mixed use scheme has been considered and there is demand for a purely employment scheme. This demand should be taken into account when reviewing the Local Plan. A site specific policy which is flexible would be welcomed.	The Housing Statement deals with potential housing sites outside of the existing settlement boundaries. As an existing allocation within the Local Plan under Policy LP1 this can be reviewed as part of the new Local Plan. The request is noted for future action.
Shouldn't be building on green space - <b>Dunsbury Hill Farm</b>	Dunsbury Hill Farm is an existing allocation within the Local Plan (Core Strategy) where planning permission has been granted and development is already taking place. The Draft Local Plan Housing Statement does not affect this. It is ultimately necessary to ensure that jobs as well as new homes are planned for.
The target of 47 houses at <b>Littlepark House</b> is too low to make a meaningful contribution to need and is not viable taking account of the costs of relocating existing residence and businesses. Areas of woodland previously cleared for development (housing to the east	While the area occupied by Littlepark House, timber yard and printing factory (SHLAA site UE28) has been included in the Draft Local Plan Housing Statement (LPHS) the surrounding area of Littlepark Wood including that west of A3(M) SHLAA sites UE29a and UE29b are currently designated as protected woodland and SINC. Further investigation

**Sites not in the plan**  
20 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
<p>and supermarket to the north) and where land drained for development lowering of water table has affected quality and sustainability of remaining woodland. Area surrounding Littlepark House (UE29a) should also be considered.</p> <p>Land west of A3(M), <b>Littlepark Wood</b> (UE29b) borders Strategic Site 1 (Campdown) and should be included in the Plan for housing and development.</p>	<p>would be needed to review the basis and current merits of these designations and assess whether there is any potential for allocation for development through the new Local Plan. No such assessment was provided as part of the consultation submission. Further assessment will take place to inform the development of the new Local Plan.</p> <p>The woodland to the west of the A3(M) adjoins the 'Land East of College Road', which is no longer being included as a Strategic Site.</p>
<p>The owners of <b>Funland Amusement Park</b>, which forms part of the allocation <b>HY45 Beachlands</b> in the Local Plan (Allocations), wish the site to be carried forward into the new Local Plan.</p>	<p>Comments noted. This allocation will be reviewed for carrying forward into the new Local Plan.</p>
<p><b>Leigh Park</b> regeneration should be considered. Some system build stock has limited (30 year) life and layouts are outdated with incidental open space and garage courts taking up unproductive space.</p>	<p>The opportunity to regenerate and improve Leigh Park Centre is considered in the adopted Havant Borough Local Plan (Allocations) but further potential is limited due to the location and level of owner occupation within the area. To make best use of the land would require large scale clearance, compulsory purchase of owner occupied properties and relocating existing residents to enable redevelopment. The new Local Plan will review existing allocations and also seek to maximise potential in these areas.</p>
<p>Approach to town centres could be applied to other shopping areas with affordable housing above large supermarket car parks.</p>	<p>In reviewing the Local Plan all opportunities will be explored to maximise the use of land with willing landowners, and on Council owned land through a review of the use and quality of such as car parks and open spaces.</p>
<p><b>Helmsley House, Bartons Road</b>, is available for development - large detached property (now flats) on 2ha site. No constraints other than TPOs.</p> <p>Nearby allocations mean Helmsley House will no longer perform gap function. Site suitable for range of residential/mixed uses either</p>	<p>This site is surrounded by on three sides by existing Local Plan allocations and is separated from the proposed strategic development by the access road serving the 'Land south of Bartons Road' site to the south. As such it would not functionally relate to the strategic site and is more suited to development in isolation. Although the grounds of this large former house, extending to some 2 ha, are well wooded there are only a small number of TPO trees on the site.</p>

**Sites not in the plan**  
20 responses were received regarding this topic

**Consultation Responses**

Key issues raised by residents and other stakeholders	HBC response
in isolation or in conjunction with the strategic site.	A small corner of the site lies within the Hampshire Minerals and Waste Plan 'Minerals Consultation Area' but the area is minimal. Therefore the site is virtually unconstrained by designations and the Landscape Capacity Assessment indicates this site (new SHLAA site UE75) has potential for development. For these reasons the site is considered to be suitable for development; however as a newly submitted site it has not been subject to consultation and is therefore appropriate for inclusion in the new Local Plan, rather than for early release through the Housing Statement.
Flood issue Investigations are ongoing but part of the <b>land East of Westbourne Avenue, Emsworth</b> (site UE27 in SHLAA) is in Flood Zone 1. A development of around 30 dwellings could take place on this with vehicular access proposed from Westwood Close. Footpath 73 through the site could be improved to be used in all weather conditions.	The SHLAA (July 2016) discounted the long swathe of land to the east of Emsworth, up to the Borough boundary running north to south between the Westbourne Road and the A27, due to potential flood issues, size and shape of the site. Only a very small part of this large area is not within the River Ems Flood Plain; most is in Flood Zones 2 or 3. While only development of the small area is proposed it is not clear whether the land required for the proposed access from Westbourne Close is in the control of the site owner. Further investigation of this and the true extent of the Flood Zone is therefore needed.
<b>Northney Marina</b> (site UE49) has been appraisal incorrectly and discounted by the SHLAA which suggested that this site has uncertainty over its suitability. This is based on two incorrect assertions (flood risk and impact on harbour nature designations). Preliminary discussions with statutory consultees demonstrate that this is not the case, therefore the robustness of the SHLAA process is called into question.  A proposal for a mixed-use development on a brownfield site has been prematurely discounted. Following discussion with the	The Northney Marina site on Hayling Island is currently in mixed use as a marina. The submission to the Call for Sites suggests that the site of some 4ha could be redeveloped for mixed uses including 30-40 dwellings. Although the site is within Flood Zone 1 the access lies within Flood Zone 3. The site is within the Chichester Harbour AONB which is a high level constraint so would be discounted if it was currently undeveloped however the site constitutes previously developed land. The submission suggests that redevelopment of this site could fund improvements to the sea wall at Sparks Marina. The Solent LEP Waterfront Sites Study <sup>31</sup> considers the Northney Site to be the most important of the boat yards/marinas on the Island, to be supported for ongoing marine and maritime uses. This

<sup>31</sup> Solent Local Enterprise Partnership – Maritime Futures: Solent Waterfront Sites (September 2015)

**Sites not in the plan**  
20 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
Harbour Conservancy, development has the ability to enhance the character and appearance of the site and improve public accessibility to the Harbour's edge.	site is affected by the wider considerations pertaining to Hayling Island so in any case is subject to further studies and investigations and not suitable for early release.
Other areas/sites should be developed: <ul style="list-style-type: none"> <li>a minor settlement to the west of Clanfield or east of the A3 roughly opposite to Clanfield would solve many of the county's requirements.</li> </ul>	Land west of Clanfield or East of the A3 roughly opposite Clanfield is outside Havant Borough. Whilst it may have potential it would not help address Havant's objectively assessed housing need or reduce the need to identify sites within the Borough.
<b>Land near Hulbert Road</b> is currently unoccupied and has better vehicle access.	The precise area of land, or particular sites, was not identified by this respondent. Sites were submitted through the Call for Sites that have been considered in the SHLAA but discounted as unsuitable for housing various reasons. These include site L01 Land fronting Hulbert Road (SE of Asda roundabout) as mainly wooded with limited potential on remainder which has been reduced by the remodelling of the roundabout; and UE69 Land East of A3(M) which would be better suited to non-residential uses due to its location and isolation.
<b>New Lane.</b> The light-industrial units are designed for short life span and could be used for affordable housing.	It is important to protect existing employment sites in order to provide jobs for existing and new residents and create sustainable communities. Such sites would only be considered if there is clear evidence that there is no market for such uses and marketing of the site for other employment uses had been unsuccessful. Policies in the Adopted Local Plan (Core Strategy) that seek to safeguard employment land will be considered for inclusion in the new Local Plan. Also, where individual industrial units are in need of redevelopment it wouldn't be appropriate for environmental and amenity reasons to allow piecemeal residential development to be interspersed with and surrounded by industrial/employment uses.
Some of the companies in the <b>Langstone Technology Park</b> are leaving the site, so this will free up some brownfield sites to be used as an alternative to the proposed greenfield sites.	
There is potential for the South Downs College to merge with Havant College which could mean a surplus of college land.	The colleges are considering their futures and how they may best be organised to meet the future demands on their services. If land at either site becomes surplus to requirements it

<b>Sites not in the plan</b> 20 responses were received regarding this topic	
<b>Consultation Responses</b>	
<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
	can be considered through the review of the Local Plan.

<b>Proposed Modifications to the Housing Statement</b>		
<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Section 3	Land North of A27 (UE02a) to be highlighted as having uncertain potential for development. Further assessment will be required as to the suitability of the site for development through the Local Plan 2036.	Appropriate survey work will need to be undertaken and the proposal subject to consultation.
Section 3	Southmere Field, Langstone Road (UE54) to be highlighted as having uncertain potential for development. Further assessment will be required as to the suitability of the site for development through the Local Plan 2036.	Appropriate survey work will need to be undertaken and the proposal subject to consultation.
Section 3	Helmsley House (UE75) to be highlighted as having uncertain potential for development. Further assessment will be required as to the suitability of the site for development through the Local Plan 2036.	New site identified that is suitable for development but should be subject to consultation.

## What parts of the Adopted Local Plan do you consider work particularly well?

8 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Supports the aims of the Adopted Local Plan, however the Draft Local Plan Housing Statement is light in detail.	Support noted. The Housing Statement is intentionally light in detail as it is an interim framework to support decision making while the new Local Plan is being developed.
Replacement of the old workshops opposite Tesco in Havant Town Centre with retail units has provided a great success and moved the shopping centre westwards. Good to see new developments in central Havant.	Support noted. The new Local Plan will address the future direction of the Borough's town centres in more detail, supported by a full evidence base.
Accepting of the need for homes in principle – no particular issue with the allocation document, building will happen where the market needs it.	Support noted.
Policies AL2 and CS17 should be kept - preservation of remaining gaps important to Havant's identity as a semi-rural Borough/ important for demarcating settlements and ecology. Otherwise might as well be one single urban sprawl. Reducing gaps to a minimum will not serve the purpose for which they are intended.	It is not considered possible to retain the full text of Policies CS17 and AL2 and the same urban area boundaries in the new Local Plan. The need for housing is simply too high for this to be possible.
<p>Policies AL2 and CS17 must be retained in any replacement Local Plan – Solent City concept implicit without these gaps is not acceptable now nor in the future. NPPF makes it clear that it is not acceptable to squander large greenfield sites for development.</p> <p>Proposed focus on greenfield land unsustainable: does not promote Government pledges on a low carbon economy – development must be focussed as near as possible to sustainable transport nodes, chances for regeneration in urban areas neglected, will not provide good affordable housing where people want to live and work – affordable housing need very high and greenfield sites will do little to meet that need, poor provision of infrastructure – greenfield sites will</p>	<p>It is not considered possible to retain the full text of Policies CS17 and AL2 and the same urban area boundaries in the new Local Plan. The need for housing is simply too high for this to be possible.</p> <p>It should be noted that the planning of greenfield sites through a Local Plan gives an opportunity to make sure that supporting infrastructure is provided with the development and sustainable travel principles are incorporated into the scheme. The proposals in the Housing Statement (particularly Guiding Principle 3) will be carried forward into the new Local Plan, promoting development on brownfield sites wherever possible. Nonetheless, given the high development costs associated with brownfield sites, full affordable housing provision is often not provided. Development costs are generally lower on greenfield sites and full provision of</p>

## What parts of the Adopted Local Plan do you consider work particularly well?

8 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
not provide solutions to infrastructure deficiencies but will exacerbate problem.	affordable housing is generally provided.
Will extra houses trigger need for Havant Thicket Reservoir and the upheaval this would cause during construction?	See response to Portsmouth Water's comment below.
Following policies should continue unmodified: CS4, CS5, CS15, CS17, CS20, AL1 (move to Core Strategy), AL2 (overall move to Core Strategy with detail in annex or supplementary document), AL4 (move to Core Strategy) AL5 (move to Core Strategy), AL6 (split - second sentence in Core Strategy, first sentence in annex), AL7, AL8, DM1, DM2, DM5, DM6, DM7, DM9, DM13, DM14, DM15, DM16, DM17, DM18, DM19, DM20, DM21, DM22, DM23, DM24, DM25.	Noted. The specific policies will be reviewed as part of the development of the new Local Plan and the views of the respondent will be specifically considered at that time.
Key issues raised by statutory consultees	HBC response
<b>Portsmouth Water PLC:</b>	
Supports the inclusion of Havant Thicket Reservoir as a strategic site under CS18 and AL6 – request this remain the case in HBLP 2036. Text on pages 92-94 of Core Strategy and pages 17-18 of Allocations Plan remains remain appropriate and should be retained.  Acknowledges the inclusion of sites H14 (Portsmouth Water Headquarters) and H18 (Portsmouth Water Land) as strategic sites under policy HB1. Requests that this remains the case under the new Local Plan.	Support and views regarding specific sections of text noted. Within the Housing Constraints and Supply Analysis, the Havant Thicket allocations are specifically earmarked as being subject to constraint and so not available for development. Further engagement with the Environment Agency will be required regarding the need for Havant Thicket Winter Storage Reservoir. Nonetheless, in the interests of the long-term sustainability of the Borough and wider southeast region, its reallocation through the new Local Plan is supported at this point.  Sites H14 and H18 remain allocated sites.

## What parts of the Adopted Local Plan do you consider work particularly well?

8 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<b>Hampshire County Council:</b>	
Continues to support Policy CS7 and supporting text of DM1.	Support noted.

### Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
Local Plan	The issues raised will be considered further in the production of the Havant Borough Local Plan 2036.	N/A.

## What parts of the Adopted Local Plan could be improved?

7 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>Would be better to have one Local Plan rather than 'Core Strategy' and 'Allocations Plan'. It might also be appropriate to have an annex containing policies or information that changes more frequently as this would be less confusing.</p>	<p>It is agreed that having two parts of the Local Plan can be potentially confusing. This reflects the previous 'Local Development Framework' way of producing Local Plans. It is proposed the new Local Plan would be a single document.</p> <p>Detailed information that can change frequently can be included in 'Supplementary Planning Documents' and the Council has produced a number of these to support the Adopted Local Plan, such as on car parking standards. These will continue to be used, with more produced if necessary, to provide detailed information on how specific policies will be implemented.</p>
<p>Propose modification of policies as follows:</p> <p>CS1 - update reference to Public Service Village</p> <p>CS2 &amp; CS3 - take account of revised thinking on employment land and combine</p> <p>CS6 - combine with CS4 and update reference to Public Service Village</p> <p>CS7 - add reference to providing community facilities (meeting places, sports)</p> <p>CS8 - include permeability</p> <p>CS9 - amend to reflect SHMA</p> <p>CS10 - Update reference to DPD</p> <p>CS11, CS12 and CS13 - combine</p> <p>CS14 - perhaps better as a regional policy?</p> <p>CS16 - merge with CS8</p>	<p>Noted. The specific policies will be reviewed as part of the development of the new Local Plan and the views of the respondent will be specifically considered at that time.</p>

## What parts of the Adopted Local Plan could be improved?

7 responses were received regarding this topic

### Consultation Responses

<p>CS18 - update to reflect latest thinking</p> <p>CS19 - combine with CS21, update point 8</p> <p>AL3 - Review points 3 and 4, move to Core Strategy</p> <p>DM3</p> <p>DM4</p> <p>DM10 - should also discourage development in existing areas of pollution</p> <p>DM11 - strengthen and combine with DM12</p> <p>DM12 - combine with DM11</p> <p>DM13 and 14 - combine</p> <p>DM17 - suggests amending to include the following wording – ‘Hazardous installations will be identified in the adopted Proposals Map. The Council will take into account the need for incentivise and fund decommissioning as part of any redevelopment proposal through higher value land uses’.</p>	
<p>East Street (in a Conservation Area) is neglected and in need of renovation. Redevelopment for residential (potentially flats on ground floor, duplexes above), would bring activity on eastern side of town and keep North Street and West Street buoyant. Car parking will need to be provided.</p>	<p>Agreed. The future of East Street will need to be carefully considered in the Havant Borough Local Plan 2036 given the noted westward shift of Havant Town Centre.</p>
<p>Meridian Centre’s north side is dark and uninviting. Can this space be devoted to opening up the centre and providing seating? Would former car park space be big enough for a cinema? Effect could be transformative to the town.</p>	<p>The owners of the Meridian Centre will be a key stakeholder in the development of the new Local Plan and the future of Havant Town Centre. A key consideration of the plan will how to boost the town centre and the future of the Meridian Centre is part of that.</p>

## What parts of the Adopted Local Plan could be improved?

7 responses were received regarding this topic

### Consultation Responses

<p>Brent Goose and Wader Site H08 is also Site BD11, which is allocated for employment. If land is to be developed there will need to be an extensive wildlife appraisal. Seems unlikely this could be achieved within the site but could be achieved by suitable measures on H05A (UE30 Land South of Lower Road).</p>	<p>Allocation BD11 is part of the Local Plan (Allocations) which itself was subject to a Habitats Regulations Assessment (HRA). This assessed the impact of the allocation on the Solent Special Protection Areas and the supporting habitat such as that found on site BD11. This will be re-examined as part of the HRA of the new Local Plan and, if necessary, suitable mitigation measures would be sought to support the proposed development.</p>
<p>The type of homes should be reconsidered – American style condominium complex developments would provide a smaller footprint but would provide enough housing.</p>	<p>A mix of development types and sizes will be needed to provide for the full range of housing needs. Denser apartment complexes, potentially using a private rented sector model can be particularly suitable on brownfield, town centre locations with good transport links.</p>
<p>Policy CS16 should become fully inclusive of all groups in the community. It should include dwellings which are ‘fully inclusive by design’ with measures such as space to turn, adequate sized bathrooms, downstairs bedrooms, internal lifts and structural materials for overhead hoist tracks fitted. Even if 10% of new homes or at least single storey homes were built with this in mind.</p> <p>Concepts of equality and full inclusivity should continue to be incorporated through the design (section 7.39-7.53).</p>	<p>This will be investigated further as part of the policy review process. Under the Government’s Housing Standards Review, there is a limit on what can be achieved through the planning process in this area. This policy requirement will be considered further through the Havant Borough Local Plan Review 2036.</p>
<p>Road and pavement design should be linked to one single guidance document, i.e. ‘Manual for Streets’</p>	<p>The HBLP 2036 needs to be able to provide consistent advice for developers into the long term. Unfortunately as Manual for Streets could be updated, it would not be prudent to simply refer to one document, however a more general term such as ‘relevant national guidance’ would by its nature refer to Manual for Streets and any potential replacement.</p>
<p>There is a huge emphasis on exercise and outdoor travel for able-bodied people, especially cycle paths. This is OK to a point providing the rules are correctly followed as to pavement widths and signage implemented to BS8300 or RNIB standards.</p>	<p>This will be investigated further as part of the policy review process. When new developments are built, highways, footpaths and other access routes are generally not adopted by Hampshire County Council and so specific standards used vary more.</p>

## What parts of the Adopted Local Plan could be improved?

7 responses were received regarding this topic

### Consultation Responses

Key issues raised by statutory consultees	HBC response
<b>Portsmouth Water PLC:</b>	
When the Core Strategy was adopted, the route of associated pipeline from Havant and Bedhampton Springs to the south side of reservoir was not received. As the route is now approved, there is the opportunity to merge the two allocations.	Noted.
<p>In relation to groundwater quality (CS11, section 7.07), Portsmouth Water state that “groundwater protection is crucial in providing a reliable water supply for Havant Borough”. This should be specified in policy wording.</p> <p>CS13 (Green Infrastructure) should make reference to the chalk aquifer that underlies the whole of Havant Borough as it provides an essential ecosystem service.</p> <p>CS15 (Flood and Coastal Erosion Risk) should make reference to infiltration boreholes as an example of inappropriate sustainable drainage systems across Havant Borough as they represent potential groundwater pollution pathways. Specific wording supplied.</p>	The review of the Local Plan will include a review of all current policies.
<p>Special Protection Zones (SPZs) are listed under ‘known constraints’ for a number of sites in the Allocations Plan. However there are some omissions, the following sits are associated with SPZs and should be captured in ‘known constraints’ tables:</p> <ul style="list-style-type: none"> <li>• HO6, Warblington School Field (off New Lane), SPZ1c</li> <li>• UE3a, Land north of Bartons Road, SPZ1c</li> <li>• UE3b, Land south of Bartons Road, SPZ1c</li> </ul>	Havant Borough Council will continue to consult with Portsmouth Water regarding planning applications which are made in any of the SPZs. The site profiles will be updated with the relevant information.

## What parts of the Adopted Local Plan could be improved?

7 responses were received regarding this topic

### Consultation Responses

- UE4, Strides (Manor) Farm and Copseys Nursery, SPZ1c
- UE33, Eastleigh House, Bartons Road, SPZ1c
- UE43, Havant Garden Centre, Bartons Road, SPZ1c
- BD14, Solent Road North, SPZ1
- H10/BD30, Market Parade, SPZ1
- H22/H72, East Street, SPZ1c
- H69, former Oak Park School, SPZ1.

#### Hampshire County Council:

For consistency, it would be helpful if the criteria regarding an appropriate marketing process in DM3(2) could also be applied to Policy DM2.

This will be investigated further as part of the policy review process, however consistency of approach towards marketing across policies would initially appear a pragmatic way forward.

### Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
Local Plan	The issues raised will be considered further in the production of the Havant Borough Local Plan 2036.	N/A.

## Are there any areas which are not covered in the Adopted Local Plan which the Havant Borough Local Plan 2036 should address?

7 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Quality of building is questionable and small. Internal space standards should be carried forward.	The Adopted Local Plan does not contain minimum space standards. The Havant Borough Local Plan 2036 will review this, in line with the Housing Standards Review, to ensure the issues of addressing housing need and providing high quality, sustainable developments are balanced.
Prevent second home-ownership, especially in new developments near the harbour.	This is not a matter which can be considered or addressed through the planning process.
Include provision for self-build and co-building.	In line with the requirements of Section 1 of the Self-Build and Custom Housebuilding Act 2015, the Council keeps a register, additional details on this process can be found at <a href="https://www.havant.gov.uk/planning-and-environment/planning-policy/self-build-and-custom-housebuilding">https://www.havant.gov.uk/planning-and-environment/planning-policy/self-build-and-custom-housebuilding</a> . The need for any specific policies in the Local Plan 2036 regarding self-build and/or custom build will be considered further through the Havant Borough Local Plan 2036.
Encourage 'green' and experimental design.	This matter will be considered through the Havant Borough Local Plan 2036.
Need to ensure adequate large, natural areas left for recreation, small safe areas for children and allotments	Green infrastructure and open space are required on all larger housing developments under the Adopted Local Plan. The open space provision will be considered through the Havant Borough Local Plan 2036.
Need to consider health risks of diesel pollution and stress of road noise in development near A27 and other major routes.	Policy DM18 (Protecting New Development from Pollution) currently manages issues such as noise and air pollution. These matters relating to the adopted policy requirements will be considered through the Havant Borough Local Plan 2036.
Need to ensure there is good public transport provision to schools,	Policy DM11 (Planning for More Sustainable Travel) addresses sustainable travel through

## Are there any areas which are not covered in the Adopted Local Plan which the Havant Borough Local Plan 2036 should address?

7 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
surgeries, shops, workplaces etc. Should be safe, preferably separate pedestrian and cycle paths.	new developments. These matters relating to the adopted policy requirements will be considered through the Havant Borough Local Plan 2036.
Should consider provision of community facilities and buildings for increase in households. Difficult for community uses to grow when set against high housing need and residential land values.	Agree that a thriving, sustainable community needs housing, employment and community facilities. The community facility needs of the different parts of the Borough will be addressed through the review of the Infrastructure Delivery Plan.
Must take further account of any impact on the South Downs National Park (SDNP). Omission would be in breach of National Parks and Access to Countryside Act. Light pollution must be considered in areas neighbouring or adjoining the SDNP to be in accordance with the emerging policies on light pollution and the NPPF.	It is agreed that the impact on the nearby National Park must be considered. This will be explored further as the Havant Borough Local Plan 2036 is progressed.
The Local Plan should include a policy that requires development not to prejudice development of a larger site (Fareham has a similar policy). Such a policy would promote comprehensive development and would be applicable where sites are in a number of ownerships. The policy would encourage landowners to work together to achieve comprehensive and sustainable development.	This issue will be considered further in the preparation of the Havant Borough Local Plan 2036. It is agreed that, given the high housing need, it is vital that development sites are used efficiently with little or no 'space left over after planning'.
<p>The Local Plan (Core Strategy) was written before the Public Sector Equality Duty came into force and full implementation of the Equality Act. Therefore, without these referenced or considered, the Core Strategy comes over as discriminatory. Focuses on 0-18 and 65+ age groups with little focus on those in-between. Given emphasis on independent living, this group will need somewhere to live; as a result there is direct or indirect discrimination.</p> <p>Plan fails to take account of the huge changes occurring in the disability and adult services sectors where those with disabilities forced</p>	<p>The new Local Plan will be subject to a full Integrated Impact Assessment in accordance the Equality Act. However in line with the Equality Duty, the needs of all equality groups will be considered as the plan is put together to ensure that there is neither direct nor indirect discrimination in any of the proposals or policies.</p> <p>Certainly meeting housing need includes meeting the different kinds of needs for housing – this can range from accommodation for older people, care homes and housing for the disabled. This matter will be considered through the Havant Borough Local Plan 2036 which will include development requirements for site allocations.</p>

**Are there any areas which are not covered in the Adopted Local Plan which the Havant Borough Local Plan 2036 should address?**

7 responses were received regarding this topic

**Consultation Responses**

<b>Key issues raised by residents and other stakeholders</b>	<b>HBC response</b>
<p>into a regrettably unfriendly community.</p> <p>Funding cuts to community-based services in the NHS and Social Services are making situation worse. Residential homes being closed by Unitary and County Councils with no matching provision created to house them.</p>	<p>The Council has already been and will continue to work with Hampshire County Council's Adult Care Team to ensure that any need for care homes, nursing homes or other specialist types of residential development are accommodated within the new Local Plan.</p>

**Proposed Modifications to the Housing Statement**

<b>Section/Paragraph</b>	<b>Proposed Change</b>	<b>Reason for Change</b>
Local Plan	The issues raised will be considered further in the production of the Havant Borough Local Plan 2036.	N/A.

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
The new Local Plan did not appear in property searches.	The allocations in a Local Plan only appear on property searches once it has been adopted. However, property searches made following the Cabinet decision to consult on the draft Local Plan Housing Statement made reference to the review of the Local Plan and directed readers to the Havant Borough Local Plan 2036 page on the website.
<p>The timing and length of the consultation period was inadequate. Consulting in the summer period will limit the number of representations received. Organisations were unable to devote as much time for a detailed scrutiny and HBC's intentions were questioned.</p> <p>Is the rush an attempt to limit stakeholders' representations?</p>	<p>A Regulation 18 consultation does not have any specific time/length constraints. The timing/length was determined given the objectively assessed need (OAN) and the Council's aim of continuing to positively plan for the future of the Borough.</p> <p>The consultation generated 826 individual responses from residents, resident groups and statutory bodies, of which 620 (75%) were from people who had not responded to a consultation on planning policy or the Local Plan previously.</p> <p>In comparison, the equivalent consultation on the Local Plan (Allocations), which took place from December 2012 to January 2013, only generated 641 individual responses. As such, the recent consultation generated more response than previous, similar ones and the vast majority of responses were from people who had not responded to a previous consultation on a Local Plan.</p>
The next stage must not be rushed and be consulted outside of the schools holiday period.	<p>A Regulation 18 consultation does not have any specific time/length constraints. The timing/length was determined given the objectively assessed need (OAN) and the Council's aim of continuing to positively plan for the future of the Borough.</p> <p>Suggestion noted however it is difficult to avoid school holidays. Please view our website for details on <a href="#">Public Consultations</a>, both previous and upcoming.</p>

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>There was little promotion about the consultation and public exhibitions before and during the consultation period.</p> <p>A number of residents were unaware of the public consultation and exhibitions.</p>	<p>The Council undertook a variety of promotional tools to spread awareness of the public consultation period and public exhibitions. These included: 1) a range of printed material available online, at the plaza and every library; 2) 85 site notices; 3) posters in Havant and Waterlooville Town Centres; 4) a media briefing prior to the publication of Cabinet papers; 5) meetings with resident associations prior to the publication of Cabinet papers; 6) 2 specific meetings for residents who own or lease property inside strategic site 2; 7) a specific website page; 8) an extensive social media campaign; 9) Facebook adverts; 10) the Local Plan newsletter; and 11) 2094 letters and 1590 emails sent out to statutory consultees, organisations and residents who have asked to be kept updated about planning policy and the Local Plan.</p> <p>From this, the webpage had 8,132 views by 5,860 people. The posts on Havant Borough Council's (HBC) Facebook page were displayed on 6,025 accounts and generated 253 clicks and 335 reactions, comments and shares. The Facebook promotion which also took place to those who do not specifically follow the Council displayed adverts about the Local Plan on 50,768 accounts and generated 2,071 website clicks. In comparison, previous HBC campaigns have received around 1,000 clicks.</p> <p>The 826 individual responses received (see two rows above) demonstrate a high level of response and that the consultation strategy chosen by the Council was successful.</p>
<p>The consultation period should have been moved back so that promotion for the consultation could have been included in the next edition of 'Serving You'.</p>	<p>Havant Borough Council (HBC) understands that 'Serving You' is a useful tool for promotion and outlining new information. Nevertheless, given the circumstances at present in regard to not having a 5-year housing supply; it was not deemed appropriate to push back a consultation period for one publication, when a number of other promotional tools were available. Given the nature of Serving You, the lead-in times are long and so it was not practicable to use this method.</p>

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>Havant Borough Council (HBC) has consistently produced a poor response on matters of local importance. As a result, residents feel excluded from planning policy decisions and instead feel such decisions are imposed on them.</p>	<p>Planning policy by nature deals with principle rather than detail. As such, there are matters, such as access and road layout, which cannot be answered directly until a planning application is received and reviewed. As this is the first stage in the Local Plan update, it is important to outline the housing need and commence the process of identifying suitable sites. HBC will continue to inform residents as the process develops.</p>
<p>Questions were not answered at the exhibitions, therefore another one should be held.</p>	<p>HBC apologises to any residents who still feel that their questions have not been answered, however, all of the exhibitions were well-staffed with officers available to answer questions. Our contact details can be found on our website. We recommend calling or emailing us so that we can discuss any questions and queries further.</p> <p>We are aware of some of the subject content that we were unable to answer directly; examples include access and road layout. In this instance, we were unable to comment as there has been no planning application submitted. The Council are committed to answering questions in an open, honest and transparent way. This does sometimes mean that questions cannot be answered as the information is not yet available.</p>
<p>HBC should cease granting permissions for blocks of flats for the elderly that carry substantial annual maintenance charges and instead promote flats that are sold as freehold.</p>	<p>The mix of housing that is developed is determined largely by market forces. However, the Local Plan (Core Strategy) supports a mix of housing types, and specifically acknowledges the housing needs of the ageing population. It sets out what requirements will be made from developers to supply affordable housing. This matter will be considered further through the Havant Borough Local Plan 2036.</p> <p>The Council does not control annual maintenance charge rates and flats are very rarely sold as freehold.</p>

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Printed information was only available at the exhibitions.	<p>The documents of 'Why Build?', 'Where next for housing in Havant Borough', 'FAQs' and the Draft Local Plan Housing Statement were also available in physical folder packs at the Public Service Plaza and every library in the Borough. All of the documentation, information and exhibition banners that were available in physical format at the exhibitions were also available on the Council's website in PDF format.</p> <p>Please view: <a href="http://www.havant.gov.uk/localplan">http://www.havant.gov.uk/localplan</a></p>
Every household in the Borough should have been mailed a copy of the exhibition material. The failure of HBC to do this calls for a Judicial Review.	<p>The consultation material was available to everyone in the Borough by visiting their local library, the Public Service Plaza or by coming to one of the seven exhibitions that were held. There is no requirement to send documents to every household in the Borough in the regulations that manage the Local Plan preparation process.</p>
The maps in the documents at the exhibitions were not up-to-date or incorrect.	<p>The maps on the exhibition banners had a base date of 1<sup>st</sup> March 2015 as this was the most up-to-date data available at the time of production of the Draft Local Plan Housing Statement, although it is acknowledged that this could have led to some confusion at the exhibitions as the site status may have moved on.</p> <p>A small number of errors in the banners were highlighted to officers at the exhibitions, for which the Council apologises. An error in 'Where Next for Housing in Havant Borough' was also brought to the Council's attention early in the consultation process where a site was missing a label. This was corrected the same day and the printed copies of the material included the label.</p>

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
The underlying need for additional housing is presented in an advisory capacity and not as a formal policy document.	The Council acknowledges that PUSH is a non statutory body. However, the National Planning Policy Framework (NPPF) states in paragraph 159 that authorities must seek to meet the full objectively assessed need (OAN) for housing in their area, and, in paragraph 178, that “public bodies have a duty to cooperate on planning issues that cross administrative boundaries”. Housing market areas cross local authority boundaries, and Havant Borough Council (HBC) falls under the wider Portsmouth HMA. HBC’s membership of and work with PUSH contributes to discharging the duties in the NPPF.
The information boards and supporting documents were clear, concise, detailed and easy to read. The expertise of the HBC representatives was also praised.	Thank you for your comments. Havant Borough Council (HBC) aims to deliver information in a clear, transparent and open way and welcomes any suggestions for improvement.
The concept of paragraph 1.3 to either accept the housing proposals or have a national body enforce it is not acceptable in a democratic society.	If the Council does not continue positively planning for the future, the Government will take that role out of the Council’s hands and their overarching aim is to get more homes built. The Council therefore considers that the best way forward is to accept what cannot be changed: that there is a high housing need and that the NPPF requires local authorities to seek to meet that need. From this starting point, the Council can then focus on the detailed aspects to make sure that the development that does take place is sustainable and well-integrated into local communities and provides the infrastructure that is needed to support it. To go against the acts and sections specified in paragraph 1.3 would require a change to the national approach, which can potentially be enacted by democratically elected Members of Parliament.
The areas of land which landowners have not agreed to sell for development should be regularly updated and clearly identified on the maps.	When planning for development, it is standard practice to positively identify potential land for development and not vice versa.

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Developers will ignore the conditions/criteria raised from this consultation, as they are only interested in profits.	The Council will highlight a number of requirements to developers regarding this consultation. The developer is then required to demonstrate how these issues will be addressed when they submit a planning application.
Site Notices were inadequate.	Site notices were placed in 85 locations close to the proposed urban extensions and strategic sites. Nonetheless, they were used as one of many tools to promote the public consultation period and exhibitions. They contained all of the relevant information on one 'easy-to-read' page in colour. In addition, residents have commented before that too many site notices is the equivalent of littering. Therefore, a balance was required.
CIL rates should be taken out of the Council's hands and set on a national scale in line with local property prices. An additional levy should be imposed on the seller of the land/developer. This would return much needed infrastructure funds to the Council.	This comment refers to national regulations on CIL. Under the current CIL regulations, CIL rates are set locally.
Havant Borough Council will not listen to the comments made.	Havant Borough Council (HBC) will continue to listen to all comments received. The Draft Local Plan Housing Statement has been updated as appropriate from the representations made by residents during the public consultation period.
All this will achieve for the Council are new business rates to compensate for those lost from the old town.	Business rates are charged on most non-domestic properties (i.e. shops, offices, pubs etc.). The local authority in whose area the business property is located collects the business rate and pays the total income from all business properties to the Government. The Government then redistributes the national income to individual authorities as appropriate. Therefore, the proposed housing developments will not contribute towards the Council's collection of business rates.

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>The PUSH Spatial Position Statement was published in June 2016 and the Housing Statement in July 2016. This means there was only four weeks of preparation; it is not possible to give just consideration in such a short time frame.</p>	<p>Havant Borough Council's (HBC) work with PUSH means that HBC was aware of the objectively assessed need (OAN) figure before June 2016 – indeed the first PUSH SHMA was published in 2014. Therefore, preparation did occur before June 2016 and also informed the PUSH Spatial Position Statement.</p>
<p>The draft Local Plan Housing Statement only identifies sites approved by the Council; the public have been given no other sites to consider during the Council's investigation.</p>	<p>There is no obligation to present options at the Regulation 18 stage. The Council is confident that it has explored and comprehensively assessed all the reasonable alternatives for development in the Borough. Background evidence has been published at <a href="https://www.havant.gov.uk/localplan/evidence-base">https://www.havant.gov.uk/localplan/evidence-base</a> . Particularly relevant are the <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> and the <a href="#">Housing Constraints and Supply Analysis. These will form part of the evidence to demonstrate the soundness of the plan at examination.</a></p>
<p>The call-for-sites should have been more widely publicised so that residents could have suggested sites and were pre-warned that large scale development was being planned.</p>	<p>The 'Call-for-Sites' process allows for landowners to come forward with their own land which is available for development. Resident's who had requested to be updated on the progress of local plan matters were emailed the Local Plan Newsletter including the relevant information on the 'Call for Sites'. Printed copies of the newsletter were also available at the Public Service Plaza.</p>
<p>The evidence base is scheduled for completion in Q1 of 2017; this implies the allocations are approved before the evidence-base is finalised. This is dangerous and not logical.</p>	<p>A series of evidence-based documents were published on 25<sup>th</sup> July 2016 alongside the Draft Local Plan Housing Statement. The proposed allocations have not yet been approved. Please refer to the website for the specific Cabinet and Full Council dates.</p> <p>Paragraphs 1.6 and 1.7 explain that the Housing Statement forms the first formal step in the Local Plan preparation process and is an interim step between the Adopted Local Plan and the Local Plan 2036. It is acknowledged that the Housing Statement will have less weight than a Local Plan, but it sets out a direction of travel and forms the starting point for the Local Plan 2036, which will be fully evidenced and formally examined before adoption.</p>

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>The adoption of the Housing Statement in Q4 of 2016 is too soon and implies that the consultation is not meaningful and will not lead to changes.</p>	<p>The consultation period is meaningful as it allows Havant Borough Council to engage with residents and find out their views. The comments raised during the consultation period are being used to inform changes to the Local Plan Housing Statement before it is considered by Cabinet and Full Council for adoption. The need to adopt the Housing Statement is to ensure that the Council, in collaboration with communities, is continuing to positively plan for the future of the Borough and ensure a continuous supply of housing land, in line with NPPF requirements.</p>
<p>If housing is so important, then why was planning permission given for a hotel adjacent to the ASDA roundabout? Was it a S106 arrangement?</p>	<p>The hotel is included in the overall vision for Dunsbury Hill Business Gateway and is outlined in the planning permission which has already been granted. It is considered that the hotel will be complementary to the future needs of the Business Park.</p> <p>The Council must retain a balance between housing demand and employment/economic need.</p>
<p>Havant Town Centre is characterless and has a lack of cultural awareness. Town centre regeneration is needed throughout the Borough.</p>	<p>Policy CS6 (Regeneration of the Borough) in the Core Strategy (2011) outlines the need for developments which positively contribute to the social, economic and/or physical regeneration of the whole Borough. The policy specifically outlines focus on five areas of the Borough, of which Havant Town Centre is one area. On the adoption of the Housing Statement, this policy will remain.</p>

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>Infrastructure improvements should come before development.</p>	<p>A key part of the drafting of the Local Plan is to identify the infrastructure needed to make the development of sites sustainable.</p> <p>Smaller items of infrastructure, which are needed to make a development work, will be funded by developers through legal agreements with the Council. These are generally delivered alongside the development, so they are operational when the development is occupied.</p> <p>In terms of strategic infrastructure, in a climate of extremely limited resources, forward funding of infrastructure is not always possible. However, having a plan in place will allow the Council to bid for funds for strategic infrastructure in order to bring these forward at the earliest opportunity.</p> <p>Throughout the Local Plan preparation process, the Council is also in continuous dialogue with the providers of infrastructure, such as utility companies, Hampshire County Council for highways and schools, and the NHS. It should be noted, however, that it is the responsibility of these bodies to bring forward the infrastructure they deem necessary to meet the needs of the population.</p>
<p>Infrastructure improvements are required opposite to the new site at Berewood in Waterlooville.</p>	<p>The development around Berewood is not yet complete. Additional infrastructure will be included as the development continues its phasing approach.</p>
<p>All of the retirement homes being built in Havant and Waterlooville will mean many homes will be released and can be used as alternatives to new builds.</p>	<p>The Council agrees with the statement, nevertheless, the housing need is so great that additional sites are required for development.</p>

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
In recent years, planning permissions have been granted to characterless buildings and 'cheap eyesores'.	The Council deals with applications individually as they are received and seeks to negotiate, where possible, with the developer regarding design. Policy CS16 regarding high quality design from the Core Strategy (2011) will remain following the adoption of the Housing Statement. By accepting the principle, that these development sites are needed, it enables the Council and communities to have more influence over matters such as design.
The Local Plan Housing Statement is not accompanied by a detailed evidence base and Sustainability Appraisal.	The draft Local Plan Housing Statement has been accompanied by a number of evidence-based reports, including a Sustainability Appraisal. These documents were published on 25 <sup>th</sup> July 2016 and can be found at: <a href="http://www.havant.gov.uk/localplan/evidence-base">http://www.havant.gov.uk/localplan/evidence-base</a>  The Sustainability Appraisal can be found at: <a href="http://www.havant.gov.uk/localplan/regulatory-requirements">http://www.havant.gov.uk/localplan/regulatory-requirements</a>
The wording of the consultation was confusing as the Council referred to the Allocations Plan and also the 'adopted Local Plan' which is known as the Core Strategy.	Havant Borough Council apologises for any confusion. The adopted Local Plan is both the Core Strategy (2011) and the Allocations Plan (2014). However there are occasions when it is necessary to refer to either one or other of those plans. Moving forward, there will only be one plan: The Havant Borough Local Plan 2036, which will reduce confusion.
The haste is justified from the perceived threat of speculative applications as a result of McCarthy & Stone Appeal.	The Council has recently lost an appeal against its refusal to permit a housing development as HBC does not have a 5 year housing supply due to the new OAN figure. This has called into question whether the Local Plan can be considered up to date. There is therefore an urgent need to review the plan in order to retain local decision-making.
The term affordable housing is misleading, as the recent cheapest new homes built require more than the average income in the Borough.	The Council is not in a position to control the prices developers demand for homes. The Council can, however, try to improve the supply of new homes by identifying sites suitable for development. It can also seek a proportion of <a href="#">affordable homes</a> (Social rented, affordable rented and intermediate housing) in developments.

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Hampshire is being robbed of its greenfield sites to produce homes for people who work 80 miles away (i.e. in London). Homes should be built for people who need them in Havant, for Havant families.	The Strategic Housing Market Assessment takes into account a number of factors in determining housing need, including household formation, economic growth and population change. In terms of population change, both migration (within the UK and international) and natural change (births minus deaths) are considered, and the figures do show a high level of past trends in population change due to migration into the area. The objectively assessed need that Councils are required to address is informed by both types of population change, and it is not possible to plan only for the needs of the population of the Borough. It should be noted that the Council cannot control who buys property in the area. It is likely that on any development, it will be a mixture of people from within and from outside the Borough.
A number of the proposed sites are in Green Belt areas.	There is no Green Belt designation in Havant Borough.
In the Local Plan, groups with one of the nine protected characteristics are not mentioned, yet Gypsies, Travellers and Showpeople are mentioned even though they do not have one of the nine characteristics.	As highlighted in paragraph 6.31 on page 63 of the Core Strategy (2011); Local Authorities are required under the Housing Act 2004 to include Gypsies, Travellers and Travelling Showpeople in their accommodation assessments. Therefore, as the Local Plan outlines allocated sites for housing, it is appropriate to make reference to Gypsies, Travellers and Travelling Showpeople.  This is highlighted in the National Planning Policy Framework (NPPF) (2012) and the Government's 'Planning Policy for Traveller Sites' document (August 2015).  Havant Borough Council (HBC) will continue to plan for and meet the needs of all residents, including those groups who possess one of the nine protected characteristics.

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>Libraries are quoted as community assets, however, even after refurbishment; they still fail to be fully accessible; i.e. the primary disabled toilet in Waterlooville Library is on the top floor and is impossible to access by wheelchair due to the positioning of the doorway.</p>	<p>Libraries are a function of the County Council.</p> <p>The example used is a matter regarding building regulations and cannot be influenced through planning.</p>
<p>The emphasis on spending money in the Borough on "problem areas" is short-sighted. The money has been spent on community facilities, such as; playgrounds, older children activities, training opportunities, community safety opportunity etc. This is because these areas, by their virtue of their slow increase in home ownership are improving themselves; it is leaving the other less deprived areas to 'wither on the vine' and these will become additional trouble spots in the future. It leads to a breakdown in community spirit when people, who feel they are 'paying for everything' through their unsubscribing Council Tax and other levies, are getting nothing back.</p> <p>i.e. play equipment and fencing in one area of Purbrook are run down, compared to more deprived areas which have had new equipment installed.</p>	<p>It is unclear which projects are being referred to, therefore, an overview of all funding options is documented below:</p> <p>Infrastructure provision through S106 will usually be related to the development from which the contribution was derived and will therefore generally be spent in the immediate vicinity. The Council has adopted a CIL Spending Protocol which sets out how the Council will decide where CIL income should be spent. As yet, only a very small proportion of CIL income has been allocated to projects.</p> <p>Regarding other forms of spending; in times of ever decreasing resources, it is important for the Council to maximise opportunities for grant funding from all sources. The Council has been active in securing funding for infrastructure projects throughout the Borough. However, grant funding is often more readily available to tackle issues in more deprived areas and this may be why it appears that there is more investment in these parts of the Borough.</p> <p>Notwithstanding this, the Council is working with stakeholders to encourage investment across the Borough, which may be through developer contributions, grant/public funding or through private investment.</p>

## Other comments

56 responses were received regarding this topic

### Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<p>The creation of the Borough Design Guide for accessibility, as already discussed and published by Manchester City Council in partnership with the City's Access Group, should also be referenced in the Local Plan.</p> <p>An innovative move forward would be the establishment of a "community design and pre-planning approval panel'. The panel would inform the content of the design guide on a regular basis and also form a single point of contact for the entire list of SCI groups. The Panel can be formed by an annual election process, along with minimal requirements for specific representative skill types. This could be a major resource to developers, who could be encouraged to contribute towards the cost of running the panel. This approach is in harmony with the Localism Bill and could also replace advisory roles that have been lost through mandatory budgeting savings, i.e. Equalities and Access Officer.</p>	<p>Havant Borough Council (HBC) cannot reference the Design Guide for Manchester City Council as this would have been created in relation to that specific area. The Council has its own <a href="#">Borough Design Guide Supplementary Planning Document</a>. This includes the concept of Design Panels.</p> <p>Additionally there is already the Development Consultation Forum process for individual developments. These meetings are public and anyone is welcome to attend. Please view our website for the times and locations of upcoming Development Consultation Forums: <a href="http://www.havant.gov.uk/planning-and-environment/planning-services/view-planning-applications-and-planning-decisions/development-consultation-forums">http://www.havant.gov.uk/planning-and-environment/planning-services/view-planning-applications-and-planning-decisions/development-consultation-forums</a>. Pre-application consultation with the community is also strongly promoted to potential applicants.</p> <p>In addition, comments regarding specific applications can be submitted through the standard application process. Comments must be made in writing either via letter or through the public access webpage on the Council's website: <a href="https://planningpublicaccess.havant.gov.uk/online-applications/">https://planningpublicaccess.havant.gov.uk/online-applications/</a></p>

### Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
Initial explanation at beginning of the document, and then consistent use throughout.	It should be specified that the current adopted Local Plan is both the Core Strategy (2011) and the Allocations Plan (2014).	Residents site that they found the wording confusing with regard to what the adopted Local Plan was.





# Draft Havant Borough Local Plan 2036

## Consultation responses and the proposed way forward

### **Purpose of the report**

1. The purpose of this report is to provide an overview of the response that were received to the consultation on the Draft Havant Borough Local Plan 2036 and to set out the Council's proposed way forward.
2. This report has been prepared and informally considered by members. It has not been subject to formal Cabinet or Council approval. It should be clarified that the responses will still need to be formally considered as part of the Cabinet and Council consideration of the Local Plan. This provides the necessary open and public discussion and the opportunity for deputations from stakeholders on how the consultation comments have been taken forward. Nonetheless, informally considering the responses provides officers with the necessary clarity to keep moving forward with the Local Plan and make the necessary changes.

### **The journey to this point**

3. The Council has been preparing a new Local Plan, the Havant Borough Local Plan 2036, since early 2016.
4. The first stage in the preparation of the new Local Plan was the preparation and subsequent adoption of the Local Plan Housing Statement. This was consulted on in the summer of 2016 and adopted by the Council that December. The next significant milestone in the plan's preparation took place at the start of 2018 with the consultation on the Draft Havant Borough Local Plan 2036.
5. The Council has taken a positive approach to the future development of the Borough and the Draft Local Plan reflects that vision: meeting the need for development in a way that will boost economic growth and making sure that the Borough is an attractive place to live work and invest. Nonetheless, it is important to fully consider all three arms of sustainable development and make sure that in meeting the need for development, this does not happen in such a way that detracts from Havant as a place to live or the quality of the Borough's important natural and historic environment.

### **The consultation on the Draft Local Plan**

6. Consultation on the Draft Havant Borough Local Plan 2036 took place from 8<sup>th</sup> January to 16<sup>th</sup> February 2018. The Council engaged widely using a variety of different methods over and above the minimum consultation requirements within budgetary constraints, in accordance with its commitments in the [Statement of Community Involvement](#):
  - **Council website** - The Local Plan page on the Council's website was regularly updated in advance of, during and following the close of the consultation with a copy of the consultation document, and supporting material including evidence base documents were clearly signposted. The Local Plan

page also provided clear instructions on how to respond to the consultation via the online survey, email and post.

- **Leaflets and booklets** - The Council produced a series of informative content, available online and in printed form at the exhibitions to help residents to learn about what the Draft Local Plan says and how to engage in the consultation:
    - *Draft Local Plan Consultation* - a folded leaflet giving a brief overview of the key priorities of the Draft Local Plan and encouraging residents to contribute to the consultation. These were handed out at exhibitions and included details of where all the information could be found so that word could spread about the consultation
    - *Where Next for the Environment* - setting out how the Local Plan aims to protect and enhance the environment
    - *Where Next for Commerce and Town Centres* - setting out the bold vision for the future of the Borough's town centres, employment areas and for Hayling Island seafront
    - *Where Next for Housing* - setting out the Draft Local Plan's approach to housing across the Borough
    - *Where Next for Infrastructure* - setting out how the Council is working with infrastructure providers to accommodate economic growth and development whilst also improving the Borough's infrastructure networks
  - **Exhibition/Displays** - Residents were invited to attend nine exhibitions throughout the borough. A series of banners were on display with Council officers on hand to listen to concerns and answer questions from members of the public. Hard copies of the consultation material, and the evidence base documents were also available to view.
  - **Social Media** - Promotion on the Council's own accounts. There was also a Facebook campaign to promote the consultation on the Draft Local Plan, including posts encouraging residents to attend public exhibitions being held across the borough during the consultation period.
  - **Mailout** - the Council keeps a mailing list of those who have asked to be kept up to date on the Local Plan. An email or letter was sent to everyone on that mailing list.
  - **Site notices** - At least two site notices were put up for each of the proposed development sites in the Draft Local Plan. These highlighted that the site was proposed for development (and included a site plan), links to the consultation material and details of the dates, times and locations of the public exhibitions.
  - **Press Release(s) and briefing** - These were issued in the run up to the Cabinet meeting in December 2017 and at the start of the consultation.
  - **Community Networks/Forums** - Council officers attended and presented the proposals at a number of different community and resident association meetings and were available for questions following this.
7. The Council wishes to thank those residents' groups, interested parties and individuals who helped to spread the word about the consultation and encourage people to come to the exhibitions and find out more about what the Draft Local Plan proposes.
8. The exhibitions (figure 1) were very well attended, showing the enthusiasm and interest in the Local Plan amongst the Borough's residents.
9. The Local Plan webpage ([www.havant.gov.uk/localplan](http://www.havant.gov.uk/localplan)) was viewed a total of 12,895 times during the consultation period with a peak of 850 views on 9<sup>th</sup> January. This was the most viewed page on the Council's website after bin collections (potentially due to the Christmas collection dates running into January).
10. The Facebook promotion was displayed on 58,030 Facebook accounts generating 198,211 impressions (the number of times it appeared on a newsfeed). Of those who engaged on Facebook (a 'like',

comment or click through to the website), the most popular age bracket for women was 45-54 and for men it was 25-34. This generated 5,675 clicks through to the Local Plan webpage.



**Figure 1: Stride Centre exhibition**

11. The email bulletin was sent out to 2,804 people and was delivered to 2,792. A total of 1,421 recipients (51%) opened the email and 327 (12%) then clicked on a link to further information on the consultation directly from the email. This is not as strong an open and click rate as was hoped for, although it is the first time that email communication has been monitored in this way. In the future, further reminder emails will be sent to try and boost the overall response through email.

### **Consultation comments received**

12. Through the consultation, stakeholders were encouraged to use an online survey to respond to the consultation. This was designed to focus thoughts on what specific policies or sites there were concerns with and what changes should be made. Submissions by letter and email were also accepted. In order to process the content of the letters and emails, these were manually added to the questionnaire to create one dataset of responses. The 'specific consultation bodies' in the regulations (these are set out in the Statement of Community Involvement) have been kept separate and will be published separately.

13. A total of 505 individual responses were received to the consultation providing comments across 111 different policies, topics and questions. This is lower than the number who responded to the Local Plan Housing Statement, although the comments were generally more substantive in nature. The spatial distribution of where people responded from is shown in figure 2, highlighting that there are areas of the Borough from which proportionally far more responses are received. It should be noted though that the key consideration is what people have said, not how many have said it.

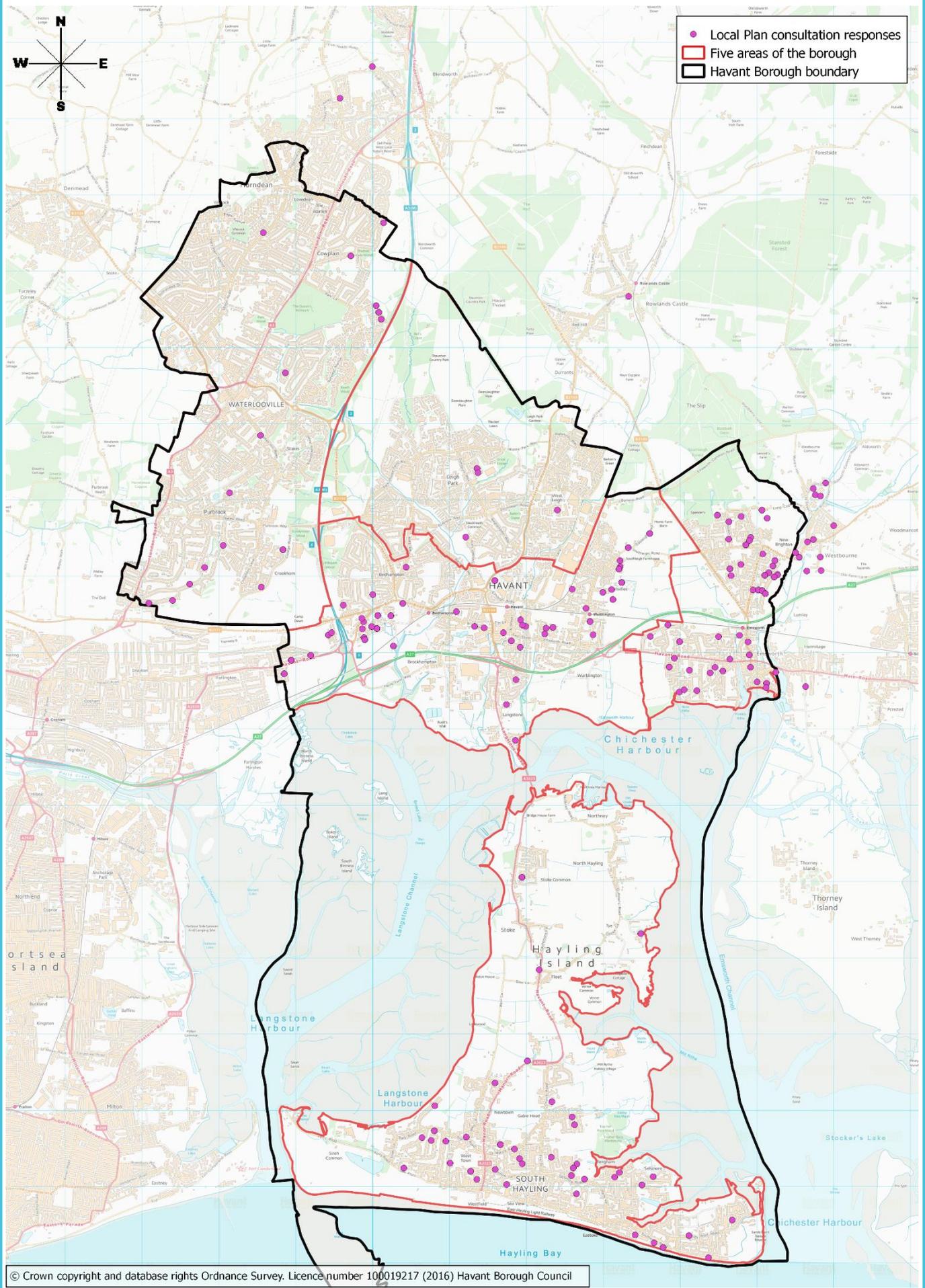
14. Two petitions were received through the consultation. These are treated as consultation responses.

15. The first petition is titled "Petition to Havant Borough council regarding the removal of Site H22 (UE30) in the Borough Council's Housing Statement 2036". This petition has 1,785 signatures. The petition sets out "We, the undersigned, petition Havant Borough Council to remove site H22 (UE30, Land south of Lower Road) from any future consideration as a housing in their Local Plan 2036 for one, some or all of the following overriding reasons:

- The damage it will cause to the historic and landscape setting of the Old Bedhampton Conservation Area
- The irritable harm it will cause to the ancient heritage of this part of the Borough
- The detrimental change that development will bring to the amenity and character of the area
- The added dangers that will arise on the blind corners and shared roadway of Lower Road and at the mini roundabout junction on Bedhampton Road as a result of the significant additional traffic using the bends and making right turns into Brookside Road
- The failure to comply with government guidance and the core principle of protecting heritage assets contained in paragraph 132 of the National Planning policy Framework and Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- The ability to provide 50 houses on other less sensitive sites
- The precedent that would be set for future further development in this area
- Any public good that might be generated would not outweigh the harm and danger that would arise from development.

16. The second petition is titled "Full infrastructure review in area of 40 Acre Farm prior to planning submissions". It has 3,458 signatures. The petition sets out "We the undersigned feel strongly that Any planning permission on 40 Acre farm should be halted until the Local Plan 2036 submission to Government That the development process should be halted until a full site and surrounding infrastructure review ,with all applicable bodies, be carried out in line with Schedule 4 of T&C planning That all development should be halted until the publication of the NSSMP Priority Action No.2 & No.3 with regards to the site being identified as High suitability for Brent geese and Waders in a previous Havant Council survey. That all development consultations be halted until the developers claims of school catchment areas have been verified and safe access to catchment schools for children on foot assured. That full post-construction costings of maintenance, health and Safety issues of the proposed SuDS are identified, analysed and reported. That any other points brought up during public consultations or private correspondence be minuted and made available for public discussion prior to any planning decision being made." It should be noted that the text above, which was submitted to the Council, is slightly different to the original change.org petition, though addresses most of the same points. The original petition is at <https://www.change.org/p/havant-borough-council-full-infrastructure-review-in-area-of-40-acre-farm-prior-to-planning-submissions>.

Figure 2: consultation responses received



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## **Summaries of the consultation responses**

17. Officers have read and considered each and every consultation response that has been received via the online survey, email and post. These have then been summarised to give an overview of the issues and considerations that were raised on each policy to inform a discussion as to how the Council should proceed. The number of comments submitted for each policy or topic is also highlighted to give a broad indication of the amount of people who have responded on that policy<sup>1</sup>.
18. It is necessary to provide a summary of the key comments raised as opposed to simply presenting the original representations. If all of the original comments were put forward then, for some policies, readers could understandably struggle to extract the salient points and key messages given the amount of responses that the Council have received. In order to make sure that the key messages are clear, and a discussion can take place regarding changes to each of the policy areas, a great deal of summarising has been necessary. The Council will publish copies of the original responses from specific (statutory) consultation bodies, which includes Government agencies and neighbouring local authorities.
19. The proposed approach moving forward for policy is set out consistently:
- i. Establishing whether there are any comments made which necessitate a reconsideration of the principle of whether the site would constitute sustainable development or a fundamental review of the policy or whether substantial changes are likely to be needed to a topic based policy;
  - ii. What matters should be considered further following the comments that have been received; and
  - iii. The justification why, for some comments, a change is not necessary or appropriate.
20. It should be noted that this report does not set out precisely what changes would be made. It does however importantly set out what matters need further consideration to create the Pre-Submission Havant Borough Local Plan 2036. The summaries also indicate what matters do not require further consideration and why. In preparing the Pre-Submission Havant Borough Local Plan 2036, officers will consider carefully those specific matters and engage further with Members as appropriate. Cabinet and Council will then need to formally decide how to proceed based on the recommendations of officers.

## **Key changes being considered**

21. For almost all of the policies, some changes are being considered. However for some, the principle of including the policy or site needs to be given further consideration. These are:
- H10 - Land at Westwood Close
  - H22 - Land South of Lower Road
  - H30 - Northney and Sparkes Marinas
22. There are also a number of proposed new sites for development that have been submitted. These are:
- |                                       |                                 |
|---------------------------------------|---------------------------------|
| ▪ Hayling Island College Sports Field | ▪ Rook Farm                     |
| ▪ Southmere Field, Langstone          | ▪ Mengham Estate                |
| ▪ Brockhampton West                   | ▪ Land south of Long Copse Lane |
| ▪ Hazelton Wood                       | ▪ Land south of Havant Road     |
| ▪ Land at Hulbert Road                | ▪ Land North of Oysters         |

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<sup>1</sup> Please note that these figures should be considered approximate as they do not include statutory consultees or any comments that were made erroneously in the box for a different policy.

23. Maps of the proposed new sites for development are provided as Appendix 1 of the consultation response tables. These sites will need to be screened for constraints<sup>2</sup> and subject to regulatory assessments<sup>3</sup> in order to establish whether they would constitute sustainable development.
24. In the Draft Local Plan, the Council also committed to undertaking further consultation regarding the potential development of Langstone Technology Park. As such, this key site for the future of the Borough's economy will be included in the pre-submission consultation.

### **Evidence base**

25. The Draft Local Plan was based on an extensive evidence base. However, that evidence base was not complete. The following studies will need to be completed:
- Housing Need (link to the Government's new methodology when finalised)
  - PUSH Integrated Water Management Strategy
  - PUSH Air Quality Assessment
  - Borough Wide Transport Assessment
  - Hayling Island Highway and Transport Infrastructure Assessment
  - Playing Pitch, sport and recreation strategy
  - Havant Borough Biodiversity Strategy (an update to the 2011 Biodiversity Action Plan)
  - Strategic Flood Risk Assessment Phase II
  - Catchment study of the River Ems (being produced by the Environment Agency)
  - Solent Waders and Brent Goose Strategy (being produced by Hampshire Wildlife Trust)
  - Tourism assessment
  - Housing Density Analysis
26. In addition to this, the following studies will need to be updated to inform the Pre-Submission Local Plan.
- Site screenings (to assess potential new sites)<sup>4</sup>
  - Strategic Housing Land Availability Assessment
  - Employment Land Review
  - Sustainability Appraisal
  - Habitats Regulations Assessment
  - Integrated Impact Assessment
  - Housing Constraints and Supply Analysis
  - Infrastructure Delivery Plan

### **Next steps**

27. The Havant Borough Local Plan 2036 comes at a critical juncture for the Borough. There is a large need for regeneration and economic growth, particularly in the town centres and on Hayling Island seafront, all of which need to adapt to economic challenges of the 21<sup>st</sup> century.
28. Nonetheless, it is necessary to remember that this Local Plan is, in reality, the last significant role of the dice in terms of sizeable new greenfield development sites. In taking a positive approach to development, it is essential that Havant does not lose what makes it successful in the first place - the Local Plan needs to build on Havant's success rather than take a step backwards. That is not to say that difficult decisions do not still need to be made nor that significant development on greenfield sites

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<sup>2</sup> All sites are screened for potential impact on heritage, archaeology, ecology, environmental health, flooding and drainage.

<sup>3</sup> Sustainability Appraisal, Habitats Regulations Assessment and Integrated Impact Assessment.

<sup>4</sup> All potential development sites are screened for access & permeability, ecology, archaeology, pollution and contamination, heritage, drainage.

can or should be avoided. However the Council will seek to make sure that the benefits of development do outweigh any identified impacts when considering development sites.

29. In preparing the Havant Borough Local Plan 2036 (HBLP 2036), the Council has been bold in its approach. Moving forward, it is proposed to maintain this bold approach to preparing the Local Plan so that it is in place as soon as is practicable. The next formal stages are the pre-submission consultation, followed by the submission of the Local Plan to Government for examination.

30. The proposed timetable moving forward is:

	2018				2019			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Development of evidence base	█							
Consultation on the Draft Local Plan	★							
Consideration of the consultation comments	█							
Preparation of the pre-submission Local Plan		█						
Pre-submission consultation					★			
Submission of the plan to the Secretary of State						█		
Examination (including hearing sessions)							★	
Receipt of Inspector's report and adoption								█

31. The interest in the Local Plan amongst the community is clear. As such, the Council intends to send out more newsletters moving forward, keeping residents and other stakeholders updated with the work that is going on.

**Concluding remarks**

32. The Local Plan is a key corporate priority for the Council. The Adopted Local Plan is out of date and the need for the Havant Borough Local Plan 2036 to be prepared as swiftly as possible is clear.

33. The consultation on the Draft Local Plan was successful and thanks should be extended to everyone who took the time to understand what is proposed in the Draft Local Plan and submit their views. A large number of points were raised which need consideration to make sure that the Local Plan is the best possible strategy for the future of the Borough.

# Draft Local Plan consultation summary tables

May 2018

Corrections made 11 July 2018 and 8 November 2018



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# Introduction sections

## Chapter 1 - Introduction

89 responses were received regarding the overall vision and strategy of the Draft HBLP 2036. These have been split between the summary tables for Chapters 1 and 2 where appropriate. Responses regarding specific policies and/or allocations have been moved to the relevant summary tables, a note and link to these are provided in the table below.

### Summary of key comments raised by residents and other stakeholders

#### WHAT IS A LOCAL PLAN? (Paragraphs 1.1 to 1.5)

Paragraph 1.1 - "Safeguarding" the environment should be replaced with "improving" as the former places the wrong emphasis when present levels of environmental pollution are not good.

#### WEIGHT OF THE DRAFT LOCAL PLAN (Paragraphs 1.18 to 1.19)

Question as to what the purpose of a "draft" plan is if it only has "limited" weight; this indicates developers will follow the previously used process of appealing against planning refusals.

Concern regarding the wording and weight to be applied; this should be deleted to avoid issues of soundness. A reference to the NPPF (or repetition of wording) would be sufficient to explain weighting.

Paragraph 1.18 is not in line with the NPPF as:

- It affords "*limited*" weight; this is beyond the wording in paragraph 216 of the NPPF
- It will be a "*material consideration*"; if a decision-taker concludes that a plan is at a very early stage, or there are significant unresolved objections, then he/she can conclude that no weight should be applied at all.

Paragraph 1.18 - "*the development plan remains that set out in paragraph 1.8*", however this paragraph refers to the Pre-Submission Plan.

#### EVIDENCE BASE (Paragraphs 1.20 to 1.22)

The Council's response to concerns regarding infrastructure through the production of an Infrastructure Delivery Plan (IDP) is welcomed and supported.

Many residents' concerns regarding specific developments relate to road access.

It is requested that the Council conduct a further consultation on the Infrastructure Delivery Plan (IDP), when the Transport Assessment is available, to ensure that it adequately addresses the road network issues.

Paragraph 1.22 - Without such important evidence bases, there is no point commenting on the Hayling Island aspects of an incomplete and doubtful plan.

Paragraph 1.20 to 1.22 - There is no reference to any historic environment evidence here or on the Council's supporting evidence webpage. It is expected that the Council should have an adequate, up-to-date and relevant historic environment evidence base and show how this has informed and influenced the plan.

Question as to whether the Council has historic environment evidence (e.g. list of locally important heritage assets, surveys of Grade II listed buildings at risk etc).

Representations regarding the Infrastructure Delivery Plan (IDP) and the Hayling Island Highway and Transport Infrastructure Assessment can be found in the summary table entitled "Evidence Base - Infrastructure Delivery Plan".

#### THE NATIONAL AND REGIONAL CONTEXT (Paragraphs 1.25 to 1.31)

Paragraph 1.27 - It is inaccurate and invidious of the HBLP 2036 to just emphasis housing supply as a key focus of the NPPF; environmental issues are no less significant. Paragraphs 7 and 8 of the NPPF should also be referenced.

The PUSH Spatial Position Statement (June 2016) talks positively about the need to create and maintain strategic countryside gaps - Local Plans need to identify such gaps.

Representations regarding Figure 18 (Settlement boundaries) can be found in the summary table entitled "E10 - Landscape and Townscape"

Representations regarding Campdown can be found in the summary table entitled "H41 - Land east of College Road, Campdown"

### **THE JOURNEY OF HAVANT BOROUGH (Paragraphs 1.32 to 1.50)**

Paragraphs 1.32 to 1.40 are welcomed.

Paragraphs 1.32 to 1.46 - It should be added that the historic street layout, cultural functions and tourism have contributed towards the area's sense of place.

Paragraph 1.35 - There is no evidence of parchment-making in Havant as far back as 1215. Submitted comments include evidence of parchment making from 17<sup>th</sup> century onwards.

There should be references to Emsworth, Bedhampton, Hayling Island, Langstone, Cowplain, along with agriculture and forestry inland, and not just Havant Town.

The plan omits any mention of the ancient Bedhampton settlement; this is a '*blind spot*' and emphasises that this important heritage asset has been overlooked/failed to be recognised.

Do not quote ridiculously old statistics which cannot be true for Hayling residents. With the closure of so many businesses in Havant Xyratex/Seagate, Colt, Langstone Technology Park is ghostly. We have lost a huge number of professional jobs to be replaced by retail parks, hotels which mostly pay minimum wage! In 2011, 40% of Havant borough residents worked within 5km of their home.

The plan will not comply with paragraphs 29-31 of the NPPF as:

- Work with neighbouring authorities regarding cycling provision has not been addressed

There is no recovery plan to resolve the minimised maintenance of off-road cycle routes (e.g. Bridleways 123, 28 and the Hayling Billy Trail)

### **HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with the introduction chapter as proposed in the regulation 18 draft with wording amendments, including those necessary simply to update the text to be relevant to the Regulation 19 draft. A breakdown of amendments to be considered, and comments where no changes are considered necessary, is provided below on a section-by-section basis.

#### **a) What is a Local Plan (Paragraphs 1.1 to 1.5):**

[Government guidance on Local Plans](#) outlines the role of a local plan and how it is a basis for safeguarding the environment. Consider how the wording could be amended to reference the guidance or whether the suggested wording may be more appropriate.

#### **b) Weight of the Draft Local Plan 2036 (Paragraphs 1.18 to 1.19)**

The comments made refer to the specific weight of a Regulation 18 draft. This will be updated as a matter of course as part of the preparation of the Regulation 19 draft.

#### **c) Evidence base (Paragraphs 1.20 to 1.22)**

**Infrastructure Delivery Plan (IDP) and Transport Assessment (TA):** evidence base studies are generally not subject to consultation in and of themselves. Nonetheless, there will be an opportunity to consider, through the Pre-submission consultation, whether the findings of those studies have been incorporated into the Local Plan in a sound way.

**Historic Environment:** The proposed key sites and allocations in the Draft HBLP 2036 have been screened for heritage and archaeological potential - these can be found in Section 2 of the [Summary of Site Screening Work \(December 2017\)](#) evidence base document. In addition, the Council's [Annual Monitoring Report \(AMR\)](#) provides a section on built heritage (pages 33 to 34) including references to the breakdown of heritage assets in the Borough and how the number of historic buildings at risk is decreasing. Consider how

references to these documents could be made in proposed policy E9 (Historic Environment and Heritage Assets) rather than this section of the HBLP 2036.

**d) The National and Regional Context (Paragraphs 1.25 to 1.31)**

The PUSH Spatial Position Statement supports strategic countryside gaps, but it is not considered that any gaps of 'sub-regional significance', nor of 'fundamental local importance' exist in the Borough, which would outweigh the need for housing. It is acknowledged that undeveloped gaps were protected by policies in the adopted Local Plan. However, in the new HBLP2036 it is no longer possible to continue this protection, as there are not enough brownfield sites and sites within the existing urban area to meet the Borough's housing need. Therefore, greenfield sites outside of the existing urban area have had to be considered for development. With this, proposed Policy E10, aims to prevent the coalescence of distinct settlements where possible.

Consider how paragraph 1.27 may be amended to reference the three dimensions to sustainable development (economic, social and environmental) as outlined in paragraphs 7 and 8 of the NPPF.

**e) The Journey of Havant Borough (Paragraphs 1.32 to 1.50)**

The [Havant Borough Profile \(January 2018\)](#) provides a breakdown of the birth and growth of the Borough's five areas; Emsworth, Havant & Bedhampton, Hayling Island, Leigh Park and Waterlooville. This evidence base includes the characteristics submitted by residents. Consider how the section may be amended to:

- Include a summary of how the five areas were born and have grown rather than solely focusing on Havant Town
- Incorporate the submitted comments regarding evidence of parchment making and the uncertainty over whether Havant parchment was used for the Magna Carta (1215)
- Explicitly state how the Borough's history has contributed to its sense of place

## Chapter 2 - Vision and Delivery Strategy

89 responses were received regarding the overall vision and strategy of the Draft HBLP 2036. These have been split between the summary tables for Chapters 1 and 2 where appropriate. Responses regarding specific policies and/or allocations have been moved to the relevant summary tables, a note and link to these are provided in the table below.

### Summary of key comments raised by residents and other stakeholders

#### GENERAL

The previous local plan was adopted in 2016 and supposed to be valid until 2026; changing the Local Plan to accommodate this development goes against the principle of having a local plan.

The Council does not care about the people of Havant and their views/opinions.

Ironically, the Council has committed sites that may have been successfully refused as applications.

The overall impression is that the plan is rushed and lacks certain detail (i.e. transport and infrastructure).

It is unbelievable that at a time of constraint/austerity, the Council has either the internal staff or money to pay external consultants to produce a verbose, repetitive document of 'wishy-washy' generalisations.

If my staff had presented a plan of this kind they would have 'been sent packing'.

The planning process took a self-inflicted credibility blow by permitting an unplanned supermarket on a greenfield site.

Concern that despite petitions from hundreds of residents and the Council's Planning Committee unanimously refusing development, such developments are allowed on appeal by the Planning Inspectorate.

The need for a Local Plan is recognised, it will enable the Council to control development/return control to councillors who are accountable to residents, and prevent inappropriate proposals.

Support to the Council's endeavour to have an up-to-date Local Plan in place in view of:

- Potential changes to the National Planning Policy Framework (NPPF)
- Potential changes to standard methodology for calculating housing numbers
- The Council's vulnerability to unplanned development based on no 5-year housing land supply

The policies address many resident concerns; it should provide a good basis for managing development.

Concern that policies will not be enforced, or they will be cast aside when inconvenient - i.e. strategic gaps.

Concern that a plan which addresses all key element required by the NPPF will place too great an emphasis on housing and economic development.

There is a lot of cold, technical detail (e.g. maps, figures and data). People will not see the plan as bold and exciting because they will not be able to look beyond the headlines (i.e. housing numbers).

Further thought should be given to what the journey to 2036 will look and feel like, i.e. bring life to the plan by presenting a range of examples of various stages in their lives.

The plan needs overarching "2036 Goals" which all development must contribute to, for example:

- Reduce Havant Borough's impact on the environment
- Make Havant one of the best places to live and visit
- Reduce commute times by 2036

The vision and strategic priorities do not reflect the three dimensions of sustainable development (economic, social and environmental) as set out in Paragraph 8 of the NPPF.

*Representations regarding the Emsworth Gap/Area between Denvilles and Emsworth can be found in the summary table entitled "KS5 - Southleigh"*

## **LOCAL PLAN HOUSING STATEMENT (LPHS) (DECEMBER 2016) & PREVIOUS CONSULTATIONS**

The successful appeal by McCarthy & Stone (2016) galvanised the Council into hastily producing new housing numbers ahead of the HBLP 2036.

Despite over 800, mostly critical comments, the LPHS was approved by the Council.

The LPHS did not meet the regulatory requirements of a Local Plan regarding consultation and examination.

The Draft HBLP 2036 draws heavily from the LPHS; this casts doubt on the extent to which the Council has assessed and understands the deliverability of the allocations now proposed.

The Draft HBLP 2036 does not appear to be supported by any broad assessment of possible alternatives.

There was no "Issues and Options Consultation". This would have given the local community a better opportunity to evaluate alternative possibilities and make an informed choice. It is important that alternative strategies proposed in response to this regulation 18 consultation are given very careful consideration.

## **WHAT WILL HAVANT BE LIKE IN 2036? (Paragraphs 2.7 to 2.27)**

The BBC published a nation-wide study in 2017 which showed 46% of land in Havant Borough is built on compared to Chichester (4%), East Hampshire (5%), Winchester (4%) and Fareham (38%).

There is no mention of safeguarding heritage in the six overlapping strategic priorities; this disregards the Council's duty. The plan would have more claim on being a "positive strategy" if the role and significance of heritage had reference in some of the other key aspects of the plan.

Paragraph 2.7 - Disappointing that there is no reference to the environment - historic or natural.

### **a) New housing meeting the varied needs of residents for affordability and type:**

The Partnership of Urban South Hampshire (PUSH) has pressured the Council to take on a larger proportion of government housing when the land space in Havant is more restricted than other Boroughs.

The PUSH mindset aims to increase Hampshire's economy; they see building more homes as a pre-requisite to a growing workforce. Artificial intelligence (AI) and robotics will lead to fewer jobs.

The plan needs to consider the policy interventions set out in the White Paper (February 2017).

The Government has demanded the intensification of housing toward the South East while other regions need support for both housing and industrial/commercial development (e.g. the "Northern Powerhouse").

The London-centric Government have no regard to quality of life, local circumstances, history or nature.

The Council claims housing numbers are set by central government; however, government sources confirm they are the responsibility of the local councils.

The critical analysis of local housing need related to existing major areas of employment is missing.

Residents feel the Council lacks the conviction to stand up and protect their wellbeing and the environment.

Questions as to why the Council has not protested/tried to negotiate with central government.

Question raised as to where the Council's Brownfield Register is located.

The Council has, perhaps, been encouraged by the New Homes Bonus.

No account has been taken of Brexit.

Increasing housing supply without first controlling land prices will not solve the housing crisis.

The scale and density of building is alarming and will lead to continuous urban sprawl along the south coast.

Whilst we may have an ageing population, to counter this local young families are only supposed to be having 1.2 children - it must balance out somewhere without the need to urbanise every non-protected piece of land in the Borough.

There is no indication of how adjacent Boroughs and dealing with their respective housing plans.

There is a massive shortage of housing; the Council should get on and facilitate home building.
The Council should look at the waste of unused and outdated industrial sites within the Borough.
The design and building of new houses should be sympathetic to the area so that generations take pride.
The plan needs to ensure developers provide a mix of dwellings, including affordable homes, starter homes, affordable elderly accommodation/retirement flats, extra care housing for older people and bungalows (2 to 3 bedrooms) with small gardens
The Borough will become a retirement village/dormitory/commuter area for Portsmouth, London and Surrey.
Housing should be planned in the north of the Borough where there is suitable infrastructure (i.e. A3(M)).
The plan needs to include provision for custom and self-building, co-housing and co-operative housing; land on larger sites should be reserved for this purpose.
There is an unrealistic reliance on housing delivery from larger strategic sites to meet the identified need. Given the complex land assembly and infrastructure requirements involved in bringing forward these larger sites, they cannot be relied upon to address all of the short-term delivery issues.
Paragraph 2.10 - This is a positive statement and is supported
<i>Representations regarding housing trajectory and types of sites to come forward first can be found in the summary table entitled "H1 - Housing need, supply and brownfield sites"</i>
<i>Representations regarding Affordable/Social Housing and the Hampshire Homes Register can be found in the summary table entitled "H2 - Affordable Housing"</i>
<i>Representations regarding housing density (both in and outside the countryside) can be found in summary table entitled "H3 - Housing Density and Mix"</i>
<i>Representations regarding the need for Council-run care and nursing homes can be found in the summary table entitled "Evidence Base - Specialist Housing Analysis"</i>
<b>b) New employment, education and training opportunities to boost the economic growth and address the skills gap:</b>
Pleased that the plan considers retail and employment opportunities.
The need to develop business and employment opportunities is understood; however, this should not be at the cost of existing communities.
Concern that there is not enough space allocated for employment sites to produce sufficient jobs for the proposed level of housing.
Concern that the Borough has the lowest application rate to universities in the country; this should be noted in the plan and must be addressed if the area is to have a skilled workforce.
<i>Representations about Havant Town are covered in the summary table entitled "KS1 Havant Town Centre"</i>
<i>Representations about Dunsbury are covered in the summary table entitled "KS6 - Dunsbury Park"</i>
<b>c) New infrastructure improvements to support communities and businesses:</b>
Pleased that the plan considers education and healthcare.
<b>Trains:</b> There should be a plan/policy to encourage the use of the four railway stations.
A pedestrian/cycle network should be identified in the plan.
The plan needs to recognise that people drive; it should not be presumed that people will use public transport, walk and/or cycle.
<b>Transport assessment:</b> The plan cannot be signed off without the Transport Section/Plan; this should define specific measures that will be done to improve driving conditions, reduce commute times (set an objective to achieve by 2036), the volume of traffic/gridlock and sufficient public transport.
The proposed level of housing will increase numbers commuting out the Borough for work.

The Council needs to provide good and ample parking.
There is no mention of traffic at the Rusty Cutter roundabout or school places.
Will a school bus be provided for the schools recommended in the plan?
Paragraph 2.17 - Add reference to Bus Rapid Transport (BRT) regarding bus-based public transport.
<i>Representations about the A27 junction are covered in the summary table entitled "KS5 - Southleigh"</i>
<i>Representations about congestion/gridlock of specific roads/routes are covered in the summary table entitled "IN2 - Improving Transport Infrastructure"</i>
<i>Representations about air pollution are covered in the summary table entitled "E20 - Amenity and Pollution"</i>
<i>Representations about the A3023, Hayling Bridge and Hayling Infrastructure are covered in the summary table entitled "Hayling Island General"</i>
<b>d) New focus on the regeneration of the Borough's town centres and Hayling Island Seafront:</b>
The Council needs to rethink their strategy by focusing higher levels of growth in urban and town centre areas, working with local landowners/stakeholders and agreeing regeneration briefs with access to education, employment, healthcare, transport and retail for truly sustainable development.
The Council's support for the regeneration of Hayling Island Seafront and the identification of the island as a leisure destination is endorsed.
The priorities need to support the wider role of tourism as it makes a significant contribution to the economy.
The plan needs a chapter defining "Attractions and Leisure Developments" to define the types of features the Borough requires and thus promote an active and healthy populous to reduce the cost on the state.
Paragraph 2.19 - No more housing should be built until infrastructure and transport is deemed adequate.
<b>e) Celebrating Havant's natural environment, sunny climate and South Downs-Solent location whilst addressing climate change:</b>
This section should also reference to the historic environment.
Equal amount of attention and protection should be given the environment and green spaces.
Numerous places in the Borough do not have protection; this should be looked at again.
Development will result in damage/harm to nature and people through pollution, water and waste treatment demands, traffic congestion and lost of most versatile agricultural land.
New development must include green spaces/green infrastructure and achieve separation from traffic, along with newly planted trees and hedgerows so that residents benefit from clean air, wildlife and wellbeing.
The Victorian ethos of providing parkland and green corridors should be emulated.
There should be no development south of the A27 so to preserve the rich coastal wildlife habitat.
The Council appears to be building as many as it can irrespective of the impact on the character and sustainability of its landscapes.
The Council should focus on sustainable brownfield sites and needed urban regeneration; this will preserve the wildlife, habitats and much-loved countryside.
There is resentment and distrust in the planning system as strategic gaps have been removed.
Development in the countryside/rural fringes whitewashes the local plan policies; it demonstrates bad planning and a weak/cynical planning authority pushing housing in areas of perceived lower objection levels.
Although housing pressures are acknowledged, the countryside envelope should still be preserved as to: <ul style="list-style-type: none"> <li>• Maintain the separate identities of communities</li> <li>• Protect habitats for endangered species</li> <li>• Protect urban areas from flooding</li> </ul>

- Protect the provision of open space for recreation and enjoyment of the countryside
- Protect and manage water quality
- Prevent the irreversible and adverse impact on the character of semi-rural areas
- Prevent out-commuting and high levels of car ownership

*Representations about Land north of Long Copse Lane (H6) and Land at Westwood Close (H10) can be found in their respective summary tables*

The plan hints to a new biodiversity document with the term “Action Plan” replaced with “Strategy”; a plan is usually a series of specific steps whereas a strategy merely signposts the direction of travel.

There is no real acknowledgement that developers must demonstrate net benefits to biodiversity.

A condition of planning should be that an ecological clerk of works is appointed on all major sites.

The plan says little about achieving a balance between housing provision and conserving natural assets.

As a sea-facing community, the Borough is likely to be in the front line of climate change/sea level rise.

Planting more trees and hedges can manage climate change and remove carbon from the atmosphere.

Trees replanted by developers are often dwarf varieties which are less robust for carbon storage.

Importance of adaptation/mitigation to climate change mentioned; however, few specific examples proposed.

There are no allocations for building renewable energy capacity, i.e. charging points.

The Council should have an objective/mandate to reducing the impact on the environment which includes:

- Solar photovoltaic panels
- Solar street lights
- The use of ground source heat pumps
- All developments to be carbon neutral

Waste recycling will become more of an issue with an increasing population.

Paragraph 2.22:

- This should be revised to identify the role tourism accommodation has in the Borough for driving economic growth and how this can be further promoted
- Reword first sentence to include ‘*and tourism opportunities*’
- Add to the end of the paragraph, ‘*as well as taking wider opportunities to support tourism in the Borough, in recognition of its contribution to economic growth. This will include promoting tourism accommodation*’.

*Representations about Home Quality Mark (HQM) can be found in the summary table entitled “E8 - Low Carbon Design”*

*Representations about the Sustainability Appraisal (SA) can be found in the summary table entitled “Evidence Base - Sustainability Appraisal”*

## **DEVELOPMENT STRATEGY (Paragraphs 2.28 to 2.40)**

There is no mentioned of safeguarding heritage; this disregards the Council’s duty.

Caution is urged not to be over reliant on previously developed sites, otherwise this will bring significant risk and may undermine the plan’s capacity to bring forward new housing in the short-term.

Pleased to see the commitment to driving and delivering sustainable development and the recognition of the finite amount of undeveloped land available.

Paragraph 2.29:

- The Council should stand up to central government and reduce the number of homes
- Development should comprise one and two-bedroom properties only

- Development should be built cheaply so that young people can afford them and when sold on should only be reserved for other young people looking to buy
- Development on prime agricultural land should not be included
- The purchasing of second homes and/or several houses to rent should be prevented
- Existing second home owners should pay increased Council Tax to help pay for social care

Paragraph 2.31 - Support for focusing development close to existing services/facilities (i.e. town centres)

Paragraph 2.35:

- Pleased to see acknowledgement of high quality environment and that the plan seeks to protect biodiversity value and the benefits this has for residents
- The benefit of the natural environment to the local population must not compromise those species and habitats which form this very environment
- Areas of high quality biodiversity value, within and outside designated nature conservation areas, must be protected
- Access to nature conservation areas must be managed so that damage is not caused by increased recreational pressure
- Should also be acknowledgement of the role of the historic environment

Paragraph 2.38 - Expand reference to safeguarding sites to include wider south Hampshire Bus Rapid Transport (BRT) routes, i.e. cross-Borough, route to Portsmouth and any necessary land on Hayling Island.

Paragraph 2.39 - It is hoped that the Council has considered the locations of the existing ecological networks when deciding which greenfield sites are to be developed.

*Representations about timing of infrastructure can be found in the summary table entitled "IN1 - Effective Provision of Infrastructure"*

*Representations about the area between Denvilles and Emsworth are covered in the summary table entitled "KS5 - Southleigh"*

*Representations about Castle Avenue are covered in the summary table entitled "H16 Land east of Castle Avenue"*

*Representations about the Appendix 4 (Infrastructure Solutions) are covered in the summary table entitled "Evidence Base - Infrastructure Delivery Plan (IDP)"*

## **POLICY DR1 (Delivery of Development & Regeneration)**

The strap lines '*leaving no stone unturned*' and '*open for business*' have encouraged landowners and developers to declare a permanent open season for development.

The historic environment could be made more explicit in the plan, this would be in line with the NPPF.

Support for the Council's '*open for business*', proactive and collaborative approach.

Support in general terms, especially criteria h), i) and j).

Criteria i) and j) acknowledge the 'pitfalls' of the proposed development strategy; it is questionable whether the Council has the capacity and resources to lead the simultaneous implementation of multiple large-scale urban redevelopment projects.

Add that all developments should provide safe and suitable access for all modes of transport and should not cause significant impacts on the local or strategic road network that cannot be managed or mitigated.

It is requested that the policy also mentions identified and suitable brownfield land across the Borough (i.e. Former BAE Systems Park).

The regeneration sites should be listed under a separate bullet point to KS5 Southleigh as they are a different approach to development.

The market demand for growth in Havant should be considered in assessing a planning application.

**a) A renewed focus on brownfield regeneration:**

Support proactive approach and possible use of Compulsory Purchase Orders (CPOs).

The HBLP 2036 will fail to boost the supply for housing as the plan relies on constrained and/or complex previously developed sites.

The focus on regeneration and redevelopment is appropriate; however, to meet housing need in the short-term and maintain a 5-year housing land supply, additional greenfield sites should be brought forward.

The Council should concentrate on urban regeneration as this will preserve green areas.

**b) Pre-application engagement and expectations of the development industry**

Paragraph 2.53 - It is stretching the truth to claim that Development Consultation Forums (DCFs) provide residents with a chance to influence proposals; DCFs are meetings held in public and not public meetings.

There should be a more inclusive approach beyond the DCF; i.e. a forum that allows direct engagement between communities and the developer to produce schemes that work for both.

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with the chapter and Policy DR1 as proposed in the regulation 18 draft with wording amendments. This includes factual updates and those which would be necessary simply to update the text for the Pre-Submission Local Plan.

A breakdown of amendments to be considered, and comments where no changes are considered necessary, is provided below on a section-by-section basis.

**General**

The Council will consider whether the text should be amended to include a clearer reference to the three dimensions of sustainable development as set out in Paragraph 8 of the NPPF.

**What will Havant be like in 2036? (Paragraphs 2.7 to 2.27)**

The Council will consider whether the text should be amended to clarify and further highlight a positive strategy to the historic environment and the Borough's heritage.

a) New housing meeting the varied needs of residents for affordability and type - consider whether the text/plan should be amended to include greater clarity regarding the Council's approach to custom and self-build, co-housing and co-operative housing

b) New employment, education and training opportunities to boost economic growth and address the skills gap - consider whether the text should be amended to include a reference to the Borough's low education and university application rates, and how the plan will help address this

c) New infrastructure improvement to support communities and businesses (Paragraph 2.15 to 2.17) - consider whether the text should be amended to include a reference to Bus Rapid Transport (BRT) to paragraph 2.17

d) New focus on the regeneration of the Borough's town centres and Hayling Island Seafront - consider whether the text should be amended to include a reference to the wider role of tourism and the contribution it makes to the economy. In addition, further investigate whether there is a need for additional research in respect of tourism and the visitor economy to inform the Regulation 19 HBLP 2036.

e) Celebrating Havant's natural environment, sunny climate and South Downs-Solent location whilst addressing climate change - consider whether the text should be amended to include a reference to the historic environment and the suggested wording additions to Paragraph 2.22.

**Development Strategy (Paragraphs 2.28 to 2.40):**

The Council will consider whether the text should be amended to include wider south Hampshire Bus Rapid Transport (BRT) routes (i.e. cross-borough route to Portsmouth and any necessary land on Hayling Island) in the reference about safeguarding sites in Paragraph 2.38 and further emphasis on the historic environment.

**Policy DR1 (Delivery of Development and Regeneration)**

The Council will consider whether the text should be amended to include a more explicit reference to the historic environment.

**b) Pre-application engagement and expectations of the development industry (Paragraphs 2.48 to 2.53)**

The Council will consider whether the text should be amended to include further clarity on what the DCF process entails and residents' expectations.

**Comments where no change is considered necessary**

The Adopted Local Plan (the [Local Plan \(Core Strategy\) \(March 2011\)](#) and the [Local Plan \(Allocations Plan\) \(July 2014\)](#); this is out of date. This was established as fact through a planning appeal in August 2016. If the Council does not adopt a new local plan, development will be allowed at appeal and so occur in a piecemeal fashion without the necessary infrastructure to support the development.

**The Local Plan Housing Statement (LPHS):** this is not a Development Plan Document (DPD). It is a position statement as to which sites the Council considers could deliver sustainable development to address the Borough's housing need. The statement only identifies potential sites, it does not allocate them for development. Both the LPHS and the Draft HBLP 2036 have been supported by Sustainability Appraisals (SA). The SAs assessed the suitability of sites and potential alternatives.

**Brownfield register:** The Brownfield Register can be found on the Council's [Strategic Housing Land Availability Assessment \(SHLAA\) and Brownfield Register webpage](#).

**Issues and options:** whilst an issues and options consultation was not carried out, this is not necessary under the regulations and it is considered that the completion of a full draft plan has allowed key stakeholders, residents, developers, consultants and agents to influence the specific details of the emerging plan. The Sustainability Appraisal shows very limited options to accommodate the need for development in Havant Borough, giving an issues and options consultation only limited value.

**Housing need and the impact of Brexit:** the need for housing is made up of natural changes to the population and migration, both domestic and international. However, 95% of the Borough's residents are British. The population is naturally rising and together with an increasingly elderly population, this creates additional housing need. The Government's new standard methodology to calculate housing need is based on past trends; with this, the Government have confirmed that the projections set out in the September 2017 "planning for the homes in the right places" consultation took into account a substantial fall in net immigration following Brexit in March 2019. The Government has made it clear that significantly boosting the supply of new housing is a national priority. This will not change as a result of Brexit.

**Evidence base on transport:** the Borough-wide Transport Assessment (TA) and the Hayling Island Highway and Transport Infrastructure Assessment are underway. The findings of these assessments will be used to update the emerging plan, along with Policy IN2 and the Infrastructure Delivery Plan (IDP). The

findings of the TA will be informed by the modelling work taking place on junctions and roads around the Borough including the Rusty Cutter roundabout. The Pre-Submission Local Plan 2036 will not go out to public consultation until these infrastructure studies are completed. Although it is recognised that residents drive, it is important to emphasise and encourage the use of sustainable transport methods such as the railway, bus, cycling and walking. As set out in this chapter, the plans strategy focuses on high density housing in town centres which will maximise the use of services which exist and the higher public transport accessibility such as the railway.

The Council has been in discussions with Hampshire County Council (HCC) as Lead Education Authority regarding school places. This is explained in more detail in the Infrastructure Delivery Plan (IDP). There has been no need for a school bus highlighted through this work.

**Meeting development need through higher densities:** the Council is proposing a strategy for higher residential densities in the town centres. More specifically, Havant and Waterlooville Town Centres (KS1 and KS2) and Leigh Park District Centre (KS3) have been highlighted for regeneration opportunities, of which, residential redevelopment is proposed.

**Stopping development whilst the evidence is completed:** the Council cannot stop all development so that the Transport Assessment (TA) and the Hayling Island Highways and Transport Assessment can be completed. Developers are free to submit development proposals at any time. This is why the Council considers it necessary to push forward with the Local Plan as swiftly as possible.

**Net biodiversity gain:** the Havant Biodiversity Strategy is underway and will incorporate the findings of the Solent Waders and Brent Goose Strategy (2018), the ecological mapping work undertaken by the Local Nature Partnership (LNP) and an audit of all the local ecological conservation designations in the Borough. From these, it is anticipated that the strategy will be able to outline any potential ecological/wildlife corridors as well as suggestions of how to achieve net biodiversity gain at the Borough-wide and micro-level.

**Strategic and countryside gaps:** the PUSH Spatial Position Statement supports strategic countryside gaps, but it is not considered that any gaps of 'sub-regional significance', nor of 'fundamental local importance' exist in the Borough, which would outweigh the need for housing. It is acknowledged that undeveloped gaps are included in the Adopted Local Plan. However, in the new HBLP2036 it is no longer possible to continue this protection, as there are not enough brownfield sites and sites within the existing urban area to meet the Borough's development needs. Therefore, greenfield sites outside of the existing urban area have had to be considered for development. With this, proposed Policy E10, aims to prevent the coalescence of settlements and maintain settlement identity.

**Inclusion of the key sites in five year supply calculations:** the housing numbers proposed in KS1, KS2 and KS3 are not included in the Council's 5-year supply. As areas of search, it is considered that Havant and Waterlooville Town Centres and Leigh Park District Centre are developable over the plan period. In their individual policies, the Council has stated that it will develop master plans for these key sites to take forward the principles in the Local Plan into more detailed frameworks.

**Commercial scale low and zero carbon energy and carbon neutral homes:** the Housing Constraints and Supply Analysis shows the limited opportunities for development. As such, the focus for low and zero carbon energy will be within the settlement boundaries. This includes the use of roofspace for solar photovoltaic energy, which is supported through Policy E8. The Council is also undertaking a feasibility study into the use of Combined Heat and Power to serve the Civic Campus. New homes built today are significantly more energy efficient than those built before 2001 due to changes in Building Regulations. In the past, it has been possible for Local Planning Authorities to require significantly enhanced energy efficiency and zero carbon homes (generally through the Code for Sustainable Homes. This is no longer the case. Nonetheless, the Local Plan is proposing to require a standard of energy efficiency 19% above Building Regulations, the maximum allowed by Government.

# Key sites

## KS1 - Havant Town Centre

23 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The review rightly identifies the problems found not only in Havant, but in other town centres nationally.

Support for the regeneration of Havant Town Centre providing that historic assets are protected and enhanced. The regeneration of the town centre should be made a priority in any sequential approach to development.

Support for criteria a), b) and j) as these are part of a positive strategy for the conservation, enhancement and enjoyment of the historic environment as required by Paragraphs 126 and 157 of the NPPF.

Support to the Council's commitment to maintaining and enhancing the Borough's heritage assets.

Criterion b) - It is suggested that the following wording is added: '*enhance and conserve the historic environment*'.

Piecemeal conversions have undermined the area's conservation values; the Draft HBLP 2036 suggests little change.

Support for the use of Compulsory Purchase Orders (CPOs) on vacant plots (i.e. adjacent to the Post Office). Vacant plots should be the priority for redevelopment.

Questions raised how the Council will take enforcement action against landowners of derelict buildings.

Support for social hub and leisure units such as restaurants, cafes (not just fast food) and niche retail.

Paragraph 23 of the NPPF promotes tourism in town centres.

Support for greater housing provision in this central area to meet local needs, examples cited of how this approach has helped regenerate centres in Manchester and Salford.

The proposed 750 net new homes should be a minimum target.

The delivery of 750 net new homes is aspirational and requires detailed plans; uncertainty over the deliverability of KS1.

A forceful vision should be adopted.

Concerns over reduction in town centre parking, with suggestion for greater evening car parking for restaurants - this could be done by negotiating the use of the retail area car parks for longer periods in the evening.

The streets around the centre of Havant are used by commuters, people who work in the centre of Havant and in the retail areas, residents and visitors. There is not currently enough parking.

Suggestion to:

- Remove double and single-yellow lines to increase parking provision and act as de-factor traffic calming
- Introduce a comprehensive parking zone programme with parking permits and parking restrictions
- Include planning conditions that developments must have employee parking
- Encourage employers to pay for parking season tickets in the two-multi-storey car parks.

The current town centre layout does not provide an integrated shopping experience.

There are too many eyesores, unimaginative and distinct post war buildings which present a poor image.

### **PEDESTRIAN & CYCLE LINKS:**

It is requested that development protects and, where possible, enhances Havant Footpath 51 (southern section of retail hub) and the Shipwrights Way (Market Parade).

Amend criterion c) to include "pedestrian and cycle connectivity".

Suggestion to provide a raised walkway over the traffic for people walking between Havant Town, Tesco and M&S to reduce traffic queues.

Suggestion to develop from Havant Bus Station through to West Street (opposite McDonalds) to allow natural footfall from Havant Railway Station to Solent Road.

#### **ROAD NETWORK:**

Add road names to Figures 4a and 4b.

Concerns over increased traffic; the town centre becomes gridlocked every day at 11am and 4pm.

Criterion d):

- It is unclear whether the criterion is referring to the main B2149 Park Road North/South or the off-road pedestrian and cycle routes. The main corridor must reflect the fact it runs through the town centre where pedestrians and cyclist have priority.
- Need to reference potential Bus Rapid Transport (BRT) route to town centre and bus station.

Criterion i) - Amend to include "a transport assessment".

Paragraph 3.9 - Suggestion to add that development proposals should improve access by walking, cycling and bus. The Bus Rapid Transport (BRT) route needs to be highlighted as part of the solution to dealing with the proposed housing allocations.

Havant Bus Station no longer functions well and is ill-positioned as it blocks the traffic from the Meridian Centre Car Park. The possibility of relocation should be explored with Hampshire County Council (HCC).

It is requested that any potential adverse impact to the safe and efficient operation of the Strategic Road Network (SRN) is appropriately considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013.

#### **RETAIL HUB:**

The construction of the Central Retail Park was meant to include a subway from Wickes to Havant Park and street lighting next to the stream but neither have materialised.

The Retail Hub is soulless and could rapidly become abandoned warehouses.

The Solent Road development is successful and reads the changing retail market.

#### **HISTORIC CORE:**

Support for greater connectivity between the historic core and the retail hub.

The construction of the Meridian Centre in the 1990s did little to enhance the town as a shopping destination.

Suggestion to reconfigure the first floor of the Meridian Centre for leisure activities (i.e. cinema).

Havant, as a centre, lost its identity with the closure of its market.

The historic core provides an opportunity to provide a shopping area with character hosting independent shops and cafes.

Paragraphs 3.14 and 3.17 - The historic nature, attractiveness and sense of place should be presented as assets and an opportunity within a positive and proactive heritage strategy/vision as implied in paragraph 1.41.

It should be explained in the supporting text that development near the crossroad is likely to encounter archaeological remains. There should be a requirement for these to be preserved in situ.

Suggestion to create an Artisan Courtyard to showcase local skills (e.g. brewing, baking, craft-making, pop-up gallery etc). This would help engender local entrepreneurship and improve the visitor experience.

#### **RAILWAY FOOTBRIDGE:**

The bridge has continued to decline.

Hampshire County Council (HCC) removed the funding for a replacement bridge in 2008.
The road and railway crossings should be made a primary objective.
It is requested that a firmer indication is given in the plan for when the bridge will be replaced rather than just linking it to development in the future.
<b>MARKET PARADE:</b>
Market Parade provides a poor representation of Havant to visitors exiting Havant Railway Station.
Support for the regeneration of Market Parade.
The decision to grant permission for APP/14/01225 was a mistake. This has now expired and there is no longer an appetite for development.
Objection to the proposed tall landmark building and high-rise development in general. This would be out of character of the town centre and will set a precedent for further exceptions.
Suggestion that a height limit of 7-8 floors is placed on the proposed tall building as to prevent the historic centre being unbalanced.
Suggestion that the area currently used as a temporary car park is instead developed into a public transport hub including a Railway Station forecourt area.
The Parking SPD does not apply the two car parking spaces per two-bedroom dwelling near Havant Train Station - I urge you to consider how people who buy or rent any such apartments will park. Alternatives to car parking, i.e. car sharing schemes, should be considered.
<b>EAST STREET:</b>
The plan fails to specify how East Street will be developed.
No objection to new homes in East Street. East Street is a mess and should be developed - the Council should force developers to act or buy the site themselves and develop it directly.
The regeneration of East Street provides an opportunity for a pilot community-led housing approach (e.g. Liverpool and Leeds).
Support for the removal of East Street from Havant Town Centre's boundary.
Objection to the removal of East Street from Havant Town Centre's boundary as it is at the heart of the community and is a contradiction to Paragraph 3.7
East Street should be included in the "Historic Core" sub-heading of the policy; which should also be amended to ' <i>The traditional town centre focused on East Street, North Street, South Street and West Street - offering smaller retail units, cafes and restaurants</i> '.
East Street should be included in the new master plan for the centre.
It is unclear if the buildings in Pallant (rear of East Street) would still be in the town centre.
The Council should have contacted the 20 business owners along East Street regarding the removal of the street from the Town Centre. All services and businesses along the street should be encouraged to remain.
East Street already has an established service sector with a mix of retail, leisure and housing (photos submitted).
Nos 21 and 24 East Street are now in state of disrepair since their conversion from office to residential.
The historic buildings along East Street need to be protected.
Representations about the Gazebo Garden can be found in the summary table entitled "H24 - Car Park behind the Bear Hotel and East Street".
<b>CIVIC CAMPUS:</b>
Objections to building 300 of the 750 proposed homes by the Civic Centre due to erosion of green space and impact of increased traffic.

## HBCs proposed way forward for Regulation 19 HBLP2036

There have been no fundamental matters raised which indicate that the policy and the level of residential redevelopment proposed in the town centre is not deliverable or should not be allocated in the HBLP 2036. Proceed with the policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to include:

- The suggested wording amendments/additions for Paragraphs 3.9, 3.14 and 3.17
- The suggested wording amendments/additions for criteria b (public realm), c (pedestrian connectivity), d (accessibility) and i (digital communication)
- Road names on Figures 4a and 4b
- A requirement that any adverse impact on the Strategic Road Network (SRN) is considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013
- Requirements that development protects and, where possible, enhances Havant Footpath 51 and the Shipwrights Way
- A requirement that any archaeological remains must be preserved in situ

From the comments received, it may be appropriate to either create a new policy which outlines the vision for East Street (excluding site H24) or include it within the town centre (KS1) for residential development to guide the transition of East Street from its current town centre role to a new edge of centre role.

The following detailed matters are for consideration at the planning application stage and are covered by policies in the Local Plan and supporting Supplementary Planning Documents (SPDs):

- Improving Transport Infrastructure (IN2)
- Housing Density (H3)
- Historic Environment and Heritage Assets (E9) regarding the protection of listed and historic buildings
- Parking (Havant Borough Parking SPD - July 2016)

Comments where no change is considered necessary:

- The Council has very limited powers to take enforcement action against landowners of derelict buildings
- The flexible approach of the policy would not prevent tourist facilities from coming forward in the future
- The housing numbers proposed are not included in the Council's 5-year housing supply. As an area of search, it is considered that they will come forward for development later in the plan period
- **Master Plan:**
  - It is specified in Paragraph 3.10 of the Draft HBLP 2036 that "the Council will develop a new Master Plan for the Town Centre taking forward the principles in the Local Plan into a more detailed framework". This will help prevent piecemeal development and, instead, provide a coordinated vision for the town centre. As such, the following will be considered at the master planning stage:
    - Provision of an integrated shopping experience with pedestrian/cycle routes
    - The visual representation and design of the town centre (including Market Parade)
    - The height of the tall landmark building in Market Parade
    - The linkages between public transport (please note it would not be viable, nor deliverable to relocate the Havant Bus Station)
    - The location and extent of car parking (depending on demand)
- **Retail Hub:**
  - There is already a subway from Wickes to the north-west corner of Havant Park (by Havant Cricket Club and Changing Rooms)
- **Historic Core:**
  - A market takes place along West Street every Tuesday and Saturday

- Paragraph 3.17 highlights that on the first floor of the Meridian Centre “there is an opportunity to explore alternative non-shopping uses that provide community or leisure facilities”; the policy would, therefore, not prevent a cinema and other leisure uses coming forward
- **Railway Footbridge:**
  - The enhancement and/or replacement of the railway footbridge will require a source(s) of funding; the future redevelopment of Market Parade will contribute towards this
- **Market Parade:**
  - Although planning permission for APP/14/01225 has expired, the Council’s vision still includes a tall landmark building reflecting its accessible location
- **East Street:**
  - The units along East Street are in private and not public ownership; therefore, the community-led housing approaches being carried out in Liverpool and Leeds would not be possible here
  - If it is deemed appropriate to continue with the removal of East Street from the town centre boundary, it would not mean that current businesses would have to leave. The removal would simply release the street from planning restrictions associated with a town centre location and, as such, would allow vacant units to be converted to residential dwellings at ground floor level.
  - The section of the Pallant adjacent to the south of Waitrose would remain in the town centre boundary
- **Civic Campus:**
  - It is envisaged that the 300 homes proposed will be built in the footprint of the Havant Police Station, Her Majesty’s Courts Service and Hampshire Probation Service, BT Telephone Exchange and the Jobcentre Plus (Department for Works and Pensions Office) once these public services have either been successfully relocated due to being surplus to requirements. As such, most of the redevelopment will take place on brownfield land with very limited green space lost.

## KS2 - Waterlooville Town Centre

10 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for the regeneration of Waterlooville Town Centre.

Support for greater housing provision in this central area to meet local needs, examples cited of how this approach has helped regenerate centres in Manchester and Salford.

The regeneration of the town centres should be made a priority in any sequential approach to development.

There is evidence of socio-economic benefits for seeking a residential component of a wider regeneration strategy.

There is uncertainty around the deliverability of KS2 due to viability concerns, land assembly negotiations and others. The policy should not be relied upon to provide new dwellings.

It is suggested that a master plan exercise is undertaken to help realise the potential of this under-utilised area.

Paragraph 23 of the NPPF promotes tourism in town centres.

#### **RESIDENTIAL DEVELOPMENT & DENSITY:**

Concerns over insufficient parking, density and height of development; high-rise would be oppressive and ugly.

The capacity of 600 new dwellings could be increased through design and density if appropriate.

Waterlooville shopping precinct should be demolished and replaced with housing. Existing shops could be relocated to the more modern shopping area west of Waterlooville.

#### **RETAIL:**

Support for Criterion j). Clarification that the "primary shopping area" refers to the primary frontages outlined in Figure 5b.

Criterion k) - this is too restrictive given the rapid changing nature of retail.

Criterion l) - it is inappropriate as a matter of principle to preclude residential uses within the primary shopping area.

#### **PEDESTRIAN & CYCLE LINKS:**

Amend Criteria b) and gg) to include cycle connectivity.

Amend Criterion c) to include a reference to the need for a cycle route through the town centre which avoids the mains roads around the town centre.

The cycle provision to the town centre is poor and feels unsafe when crossing Maurepas Way.

The pedestrian link between St George's Walk (Area 1) and Wellington Retail Park (Area 3) is unsuitable due to steep steps; the long footway is also exposed to all weather conditions.

Suggestion to restore the old slope adjacent to St George's Hall to the original layout which is covered.

The pedestrian section of London Road is run-down, poor quality and has no atmosphere or character.

In line with the aspirations of the Hampshire Countryside Access Plan, it is requested that the following amendments are made to Criterion gg):

- Development that improves the connectivity of Swiss Road, St George's Walk, London Road and across Maurepas Way to Berewood and Havant Footpath 11 to encourage pedestrian flow.
- Development which protects and enhances Havant Footpath 10.

#### **ROAD NETWORK:**

Add road names to Figures 5a and 5b.

It is requested that any potential adverse impact to the safe and efficient operation of the Strategic Road Network (SRN) is appropriately considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013.

Although there may be fewer privately owned cars by 2036; there will still be a large number in the intervening period.

An improvement in the layout of the encircling road network is required to integrate the town centre with its surroundings.

The transport issues facing Waterlooville and the previous investment in the Star Bus priority (previously A3 Zip) service are not mentioned.

There is a need to maintain good bus penetration into the town centre, enhance the bus facilities and improve cycle access (especially within the pedestrianised area of London Road). The removal of the St George's Walk bus stops and relocation to a proposed "transport interchange" in an edge of centre location is not supported.

It is requested that the references to the "new transport interchange" and the removal of St George's Walk bus stops are deleted.

Alterations to the bus stops and bus priority will need to be consulted with HCC and the bus operators.

#### **HBCs proposed way forward for Regulation 19 HBLP2036**

There have been no fundamental matters raised which indicate that the policy and the level of residential redevelopment proposed in the town centre is not deliverable or should not be allocated in the HBLP 2036. Proceed with the policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to:

- Include references to cycle connectivity in criteria b (connectivity), c (accessibility) and gg (improving pedestrian flow)
- Include Havant Footpaths 10 and 11 in criterion gg (pedestrian flow)
- Clarify that criterion j is referring to the "primary shopping frontage" as outlined in Figure 5b
- State that any adverse impact on the Strategic Road Network (SRN) is considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013
- Add the road names to Figures 5a and 5b
- Include a reference to the transport issues facing Waterlooville Town Centre at present, along with the previous investment in the Star Bus priority service
- State that any alterations to the bus stops and bus priority must be consulted with Hampshire County Council (HCC) and bus operators
- Incorporate a new direction for the transport interchange and the St George's Walk bus stops

The following detailed matters are for consideration at the planning application stage and are covered by policies in the Local Plan and supporting Supplementary Planning Documents (SPDs):

- Landscape and Townscape (E10)
- Housing Density (H3)
- Parking (Havant Borough Parking SPD - July 2016)

Comments where no change is considered necessary:

- The housing numbers proposed are not included in the Council's 5-year housing supply. As an area of search, it is considered that the site is developable over the plan period
- In relation to Wellington Retail Park, the National Planning Policy Framework (NPPF) (Paragraph 23) sets out what Local Planning Authorities (LPAs) should do to promote competitive town centre environments. In doing so, the policy outlines areas for residential-led regeneration in other parts of

the town centre and has made it clear which uses will be permitted within the primary and secondary frontages

- It is specified in Paragraph 3.31 of the Draft HBLP 2036 that ‘*the Council will produce a more detailed master plan to facilitate the implementation of this policy*’. As such, the following will be considered at the master planning stage:
  - The layout of the road network which encircles the town centre and how to improve their integration with the centre
  - The provision of bus and cycle access and safety in the town centre
  - The pedestrian/cycle link between St Georges Walk (Area 1) and Wellington Retail Park (Area 3).

## KS3 - Leigh Park District Centre

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for regeneration of the area

Master planning would be appropriate. Such a proposal could only take place as a co-ordinated scheme for redevelopment, which would need to retain and support the viability of the retail area, as well as provide an enhanced public realm.

Concern raised over lack of available feasibility analysis and associated uncertainty over delivery of dwelling numbers proposed

There is greater scope to improve the public realm to the South of Park Parade to increase the attractiveness of the area to passers-by.

Retail units should be repositioned to front on to main roads so that passers-by are aware of their existence

Park Parade could be opened to traffic and provide on-street parking to allow passengers into the heart of the shopping centre.

### HBCs proposed way forward for Regulation 19 HBLP2036

There have been no fundamental matters raised which indicate that the policy and the level of residential redevelopment proposed in the district centre is not deliverable or should not be allocated in the HBLP 2036. Proceed with the policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to include:

- A requirement for master planning/cohesive development which may also address;
  - Include provision of public realm improvements in specific areas
  - Provide on street parking and access for vehicles through Park Parade
  - Reposition shop frontages to front onto main roads

Comments where no change is considered necessary:

- The housing numbers proposed are not included in the Council's 5-year housing supply. As an area of search, it is considered that the site is developable over the plan period.

## KS4 (General) - Hayling Island Seafront

56 responses were received regarding policy KS4

### Summary of key issues raised by residents and other stakeholders

Support for regeneration of the seafront.

Comments on coastal defense and flooding:

- Flood defences on the seafront are inadequate and the Council's coastal protection policy should be revisited.
- Adequate sea defences should be designed into the plan for Hayling seafront.

Comments relating to tourism:

- Reference to the decline in tourism is not backed up by quantifiable data with regard to visitor numbers nor is there evidence of the need to cater for day or long term tourists only.
- Visitors are attracted by the unspoilt nature of the seafront and losing this will deter visitors which may affect local businesses and their ability to operate.
- Public Art is unlikely to draw in new tourists.
- The street scene should be consistent and conducive to tourism.
- Excessive parking charges act to discourage visitors.

Further development of the seafront or visitor attractions will increase pressure on the A3023 which is already beyond design limit:

- Development should only go ahead if there is sufficient road infrastructure to take extra traffic.
- Until the results of the TA are known any development should not be considered feasible or deliverable.
- Congestion on the A3023 is the cause of decline in tourism.

Development of the seafront will not benefit the island and increase the strain on existing infrastructure.

Comments on local sustainable transport infrastructure and accessibility:

- Public transport links should be established to allow easy movement between Eastoke Corner, Beachlands and the Westbeach area. Particularly connections to the Hayling Ferry should be considered. Plans should ensure that future sustainable transport links (including Hayling Railway) are protected within the plan.
- Free access should be maintained along the entire length of the seafront promenade.
- Ensuring that the Hayling Ferry is maintained is crucial to link the accommodation on offer in Hayling to the attractions available in Portsmouth.
- Greater consideration should be given to wheelchair accessible access to the seafront.
- Running, walking and cycling are key leisure activities that should be promoted. Loss of carparks that access the seafront routes will lessen accessibility for these users who bring economic gain to the Island.

Comments on design and character:

- Building flats and shops will not improve the look of the seafront and will spoil views of the sea.
- Policies should be modified to ensure that development of characterless buildings is prevented.

There should be no further development of the beachfront but the crescent by the funfair should be upgraded/refurbished.

Comments on ecology:

- Development of the seafront will mean further loss of habitats for waders and Brent Geese.
- Concern over recreational disturbance to areas designated for nature conservation value. Robust mitigation measures should be included.

All carparks need resurfacing.

Be more specific about plans to develop Council owned land.

Current development plans provide for limited land area for leisure activities. Funding and more creative plans should be sought/developed to maximise the land available for leisure activities.

With regard to the councils plan for 'leisure facilities' I would echo the comments of Richard Coates in the Hayling Islander. These development are all about further housing. It would be sad to the only car park on Southwood Road with direct access to the sea scape lost to housing. Less mobile citizens would really see a great loss by the removal of this area, HBC also loose a regular income for a short term gain. I really do wish the leisure plan was more insightful and innovative, given the pedigree and fantastic environment we have.

A tidal swimming pool on Hayling Seafront, a nice prom (accessible for all abilities) along some of Hayling beach for easy walking by the sea, a basic pier (funded via the Hayling developments), would be superb. The latter could be used to weatch windsurfing events etc.

A museum celebrating Hayling as the Birthplace of Windsurfing would be an excellent fulcrum and this enhanced profile will give a worldwide status to the Island.

**Comments about specific Hayling Island Seafront regeneration sites- please see table on 'Hayling Island Seafront (Creek Road), (Eastoke Corner), (Beachlands), and (West Beach)'.**

**Comments involving the wider Hayling area - please see table on 'Hayling General'**

#### HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage.

The Draft Local Plan clearly acknowledges the unanswered questions on transport, and indicates that development proposals on Hayling Island and Langstone should continue to be resisted. The site allocation policies included within the Draft Local Plan are only intended to provide a starting point on the detailed points that should be considered on the site, and do not change the Council's position that development proposals on these sites should be resisted whilst uncertainties remain regarding vehicular transport. There is a large text box above every proposed allocation on Hayling Island setting this out.

The policy as proposed in the regulation 18 draft should proceed, with wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses, as well as comments received on specific sites within the scope of the Hayling Island Seafront Regeneration Policy (KS4).

In addition, consider whether policy should be amended to:

- Create greater scope for the provision of leisure activities in line with Policy E3
- Promote full accessibility to the seafront areas for all users
- Strengthen wording relating to design considerations within regeneration zones (SPD/design guide)
- Include any flood defence schemes proposed by the Eastern Solent Coastal Partnership where they fall within regeneration zones
- Consider whether any increase in tourism will require further mitigation due to recreational disturbance.
- Provide greater support for future expansion of the Hayling Railway

Further evidence that may be required:

- Tourism analysis to assess visitor patterns and needs.
- Parking study to confirm the use of council owned carparks and their financial sustainability

Comments where no change is considered necessary:

Flood risk has been identified as a possible constraint to development. Details of any mitigation required under policy E12 will be considered at the point of any application for development of the site.

Ecological matters have been identified. Details of any mitigation required under policy E15 will be considered at the point of application for development of the relevant site.

The background section of the policy notes the mixed character of the seafront and the need to preserve the existing character where possible.

Parking charges are not a matter that the Local Plan can consider.

Allocations within the Draft Local Plan are aimed to give guidance on the principle of development on the site and a framework for assessing planning applications. Further detail with regard to the proposed development of the sites will be provided at the point of any planning application.

Any development of public realm improvements and capital investment projects will be considered at application stage once funding arrangements and available funds are fully explored.

## KS4 (Phase 1 Creek Road) - Hayling Island Seafront

56 responses were received regarding policy KS4 (all sites)

### Summary of key comments raised by residents and other stakeholders

Support of development of underused NAB carpark.

Both the NAB carpark and Community Centre carpark are used and should be retained.

- Concern raised as to where parking will be provided for users of the community centre.
- Parking benefits local businesses and loss of parking will result in loss revenue for local businesses.

Access through the NAB car park site to the beach is important.

The community centre is currently cheap to run, re-provision of the community centre may make it more expensive to users.

Site is prone to flooding and should not be developed for housing/further sea defences are required. Will a permanent pumping station be included to prevent issues of flooding should they occur?

Publicly accessible toilets should be retained.

Concern over provision of affordable housing and associated anti-social behaviour.

Ownership of boundaries and maintenance of such should be confirmed.

The island is short of recreational facilities for children and the playpark should be retained to ensure a safe area for play.

Building homes in this area is unsuitable due to distance from local amenities.

A water refilling station should be included in the policy.

### HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage.

No site specific matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The policy as proposed in the regulation 18 draft should proceed, with minor wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses. In addition, consider whether policy should be amended to:

- Further consider the need to redevelop the community centre
- Provide parking for current carpark users with particular regard to impact on local businesses
- Retain a safe playing area for children
- Include a requirement for publicly accessible toilets to be retained
- Provide for continued public access to the beach front at the NAB car park location
- Provide a water refill station as part of any publicly accessible development

Comments where no change is considered necessary:

- Affordable housing would be required in line with Policy H2
- Ongoing maintenance of any new development is secured through policy IN4
- Flood risk has been identified as a possible constraint to development. Details of any mitigation required under policy E12 will be considered at the point of any application for development of the site

## KS4 (Phase 2 Eastoke Corner) - Hayling Island Seafront

56 responses were received regarding policy KS4 (all sites)

### Summary of key comments raised by residents and other stakeholders

Site is prone to flooding and should not be allocated for housing.

Publicly accessible toilets should be retained.

Eastoke Corner is increasingly important to the island's visitor package.

Eastoke Corner is important to the future of the Hayling Railway.

The road network at Eastoke Corner should be rationalised to allow for landscaping and pedestrian use as well as carparking.

The Plaza area should have designated seating areas and be available for local vendors, particularly when music events are taking place. A tourism strategy can be developed through pop-up stalls without permanent structures being needed.

The Hayling Railway building is out of keeping with the area/unattractive and should be re-sited.

The Council should enforce a more visually pleasing outlook for the Hayling Railway.

Eastoke Corner already provides good facilities and redevelopment will not enhance the area.

Parking should be retained outside the Rails Lane Shops to ensure no adverse effects on local businesses.

Instead of reconfiguring the highway the existing layout should be enhanced with trees in the central part of the highway.

The need for a water re-fill station should be included in the policy.

Artwork on building walls would enhance the visual value of the area.

Understanding of the use of this area by waders and Brent Geese is vital to ensure appropriate mitigation is provided.

**Comments about specific Hayling Island Seafront regeneration sites or the regeneration of the seafront in general - please see tables on 'Hayling Island Seafront (Creek Road), (Westbeach), (Beachlands) and (General)'.**

**Comments involving the wider Hayling area - please see table on 'Hayling General'**

### HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage.

The Draft Local Plan clearly acknowledges the unanswered questions on transport, and indicates that development proposals on Hayling Island and Langstone should continue to be resisted. The site allocation policies included within the Draft Local Plan are only intended to provide a starting point on the detailed points that should be considered on the site, and do not change the Council's position that development proposals on these sites should be resisted whilst uncertainties remain regarding vehicular transport. There is a large text box above every proposed allocation on Hayling Island setting this out.

The policy as proposed in the regulation 18 draft should proceed, with wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses, as well as comments received on specific sites and the general approach within the scope of the Hayling Island Seafront Regeneration Policy (KS4).

In addition, consider whether policy should be amended to:

- Provide a requirement for publicly accessible toilets to be retained
- Include provision of a water refill station
- Retain parking outside the Rails Lane Shopping area
- Provide greater clarity as to the future of the Plaza area, provide greater certainty as to the tourism strategy for the area
- Remove the Hayling Railway building from the site allocation area

Comments where no changes are considered necessary:

- The design of the Hayling Railway building has been approved and built prior to the higher design standard expected in the designated regeneration zone
- The design standard of new development in the regeneration zone is considered in the Hayling Seafront (General) Summary
- Flood risk has been identified as a possible constraint to development. Details of any mitigation required under policy E12 will be considered at the point of any application for development of the site
- Mitigation related to Brent Geese and Solent Waders is set out in Policy E17

## KS4 (Phase 3 Beachlands) - Hayling Island Seafront

56 responses were received regarding policy KS4 (all sites)

### Summary of key issues raised by residents and other stakeholders

The existing fun fair is a key attraction to both residents and tourists and sustains tourism in the area and as such should not be re-developed.

Re-development of the funfair will remove the destination for the Hayling Railway and may affect its popularity.

Development is contrary to policy E14 with regard to development in a Coastal Change Management Area. If more development is built to the west then this will have to be protected at additional cost.

If the funfair closes then re-development of the area should be for open space and could include elements such as boating lake, gardens, seating areas, tea rooms and unusual shops.

Due to the location, development of this area will result in upmarket high cost housing.

Support for development of the site for housing, leisure and retail.

The site is suitable to accommodate greater housing numbers. Allocating the site for up to 150 dwellings will:

- Make it possible for the site to meet the associated infrastructure costs
- Allow more efficient development of the site in line with policy H3
- Further help meet the Council's housing need
- Allow greater scope for the site to provide some form of landmark in design terms

Development of the area for housing is out of keeping with the character of the seafront.

Question raised as to whether the funfair can be deemed unviable with regard to current policies DM2 and DM3.

Plans should include provision of a new visitors centre and space for educational purposes/field trips.

The funfair does not provide a negative first impression for visitors as suggested at paragraph 3.74.

Support for tourist accommodation including a hotel and self catering units.

The approach to Beachlands seafront should be unconstrained by buildings but instead use landscaping and publically accessible water features to enhance the coastal setting.

A more diverse food and drink offering in smaller intimate retail spaces would be more effective in attracting year round useage.

If the funfair is lost then an alternative attraction of equal effectiveness must be provided in the form of an aqua centre.

It is disappointing to see that the Council is using the loss of the National Watersports Association (NWA) to upsell Beachland.

**Comments about specific Hayling Island Seafront regeneration sites or the regeneration of the seafront in general - please see tables on 'Hayling Island Seafront (Creek Road), (Eastoke Corner), (West Beach) and (General)'.**

**Comments involving the wider Hayling area - please see table on 'Hayling General'**

### HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage.

The Draft Local Plan clearly acknowledges the unanswered questions on transport, and indicates that development proposals on Hayling Island and Langstone should continue to be resisted. The site allocation

policies included within the Draft Local Plan are only intended to provide a starting point on the detailed points that should be considered on the site, and do not change the Council's position that development proposals on these sites should be resisted whilst uncertainties remain regarding vehicular transport. There is a large text box above every proposed allocation on Hayling Island setting this out.

The policy as proposed in the regulation 18 draft should proceed, with wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses, as well as comments received on specific sites and the general approach within the scope of the Hayling Island Seafront Regeneration Policy (KS4).

In addition, consider whether policy should be amended to:

- Adjust the developable area in-line with Coastal Change Management Areas and give further consideration to coastal management processes
- Include provision for a replacement visitor centre
- Ensure the approach to the seafront is unconstrained by buildings so that the connection and view to the sea can be maintained
- Include provision for greater leisure facilities on the site

Comments where no change is considered necessary:

- Exclusion of housing and other commercial development on the site would make funding of public realm improvements unfeasible
- Retention of the funfair is outside of the control of the Local Authority
- Affordable housing will be required in accordance with policy H2. The cost of market housing will be defined by the market conditions at point of sale
- Provision of diverse food and drink offerings is already provided for in the plan. The exact provision will be market-led
- Reference to the requirements of the existing tourism policy are not applicable in regard to the Draft Local Plan. Policies within the draft plan are expected to supercede the currently adopted policies

## KS4 (Phase 4 - Westbeach)- Hayling Island Seafront

56 responses were received regarding policy KS4 (all sites)

### Summary of key comments raised by residents and other stakeholders

Support for development that benefits watersports users.

Development should occur as quickly as possible.

Consideration should be made to beach hut owners when making planning decisions.

The removal of sea defences has led to beach huts being damaged.

Use of the carpark by motorhomes and during events restricts local users and beach hut owners.

Windsurfers do not need extra facilities.

Watersports users bring limited economic benefit to Hayling Island.

Development of this area should incorporate a wider range of activities such as swimming and indoor sports.

Concern that the area designated as a regeneration zone includes a large area of Sinah Common with no explanation of the reason.

There is no evidence that watersport users have been consulted as to their needs.

The west beach sea front is not ideal for water sport beginners and is limited to certain tides etc so consideration needs to be given to what other facilities are there for people that are visiting that are not water sports enthusiasts or are spouses/partners or children of water sports enthusiasts that do not participate themselves.

If a suitable good quality campground with appropriate parking, storage and drying facilities with beach access were available there would be more likelihood of watersport tourists staying longer, and campground revenues would benefit the island financially and in terms of employment.

**Comments about specific Hayling Island Seafront regeneration sites or the regeneration of the seafront in general - please see tables on 'Hayling Island Seafront (Creek Road), (Eastoke Corner), (Beachlands) and (General)'.**

**Comments involving the wider Hayling area - please see table on 'Hayling General'**

### HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage.

The Draft Local Plan clearly acknowledges the unanswered questions on transport, and indicates that development proposals on Hayling Island and Langstone should continue to be resisted. The site allocation policies included within the Draft Local Plan are only intended to provide a starting point on the detailed points that should be considered on the site, and do not change the Council's position that development proposals on these sites should be resisted whilst uncertainties remain regarding vehicular transport. There is a large text box above every proposed allocation on Hayling Island setting this out.

The policy as proposed in the regulation 18 draft should proceed, with wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses, as well as comments received on specific sites and the general approach within the scope of the Hayling Island Seafront Regeneration Policy (KS4).

In addition, consider whether policy should be amended to:

- Adjust the area designated as a regeneration zone

- Ensure provision of parking designated for beach hut users
- Include further provision for non-watersport uses in proposed development
- Include any requirements of coastal change management that may arise from further development
- Provide additional accommodation facilities

Comments where no change is considered necessary:

- The economic benefit provided by watersport users has not been defined. However, the provision of facilities promotes healthy living which is a key Council priority. Additionally the 'Hayling Island Seafront (General)' table states that the need for more tourism evidence should be considered.
- The consultation process has allowed watersport users to make representations. There is support for the extra facilities proposed
- Planning must consider the needs of all users, not just beach hut owners

## KS5 -Southleigh + Masterplan

68 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### **Principle of Allocation / its extent and phasing**

Object to / regret the loss of this site to development.

Support allocation.

One of few remaining greenfield sites in the area.

Object based on loss of the gap between Havant and Emsworth - these communities should retain their separate identities / remain separate from each other and from Portsmouth / avoid continuous coastal development.

The Council gave assurances that there was no intention to develop land between Denvilles and Emworth / the Council signed an agreement that the gap would stay forever.

Need to understand evidence and funding for this development.

Site is categorised as best and most versatile agricultural land and should not be allocated.

This area is currently a green field site consisting of countryside, trees and hedgerows, and this development would be out of character with the current surroundings.

It would result in the loss of open spaces, countryside and natural habitats (TPOs and mature trees, Bechstein bats, there are common reptiles and nesting birds on this site, high quality hedgerows on this site).

This site has a stated capacity for 2000+ homes with plans to be developed in a sustainable manner. It is therefore wrong to build only half capacity here and instead make up government target shortfall with a cherry-picking approach picking on piecemeal developments that greatly impact on the community.

Site is totally unsuitable for development; More suitable sites for development need to be found which will have far less impact on the surrounding environment and have an infrastructure capable of supporting the proposed developments.

Emsworth should be protected as a fishing village.

Consider that the GVA viability evidence supporting the masterplan is incomplete - viability tests need to confirm potential returns from the proposed development more accurately. (detailed suggestions made).

#### **Extent and Phasing**

Suggest parcel of land to the west of Horndean Road should form a stand-alone allocation.

Land to the south of the A27, which will be made accessible through the infrastructure delivery associated with the A27, could come forward separately.

Support for exclusion of Coldharbour farm from site area

Large sites often deliver fewer homes and at a slower rate than originally envisaged. Suggests the over allocation of sites to ensure that the housing requirement can be delivered as a minimum.

The GVA viability report has errors of detail and does not address phasing. Viability is not demonstrated by the GVA report and further work is needed

Number of dwellings proposed should be reduced

Infrastructure must be delivered before the development

Development must be restricted if the A27 junction does not proceed

There is scope to increase the density of housing on this site, to make infrastructure delivery more viable and avoid development on smaller more sensitive sites in the area

Council have already ignored their policy for comprehensive development on this site by allowing development on Land West of Horndean Road
Support requirement for a comprehensive scheme for the strategic site, as it will result in a more cohesive development and ensure adequate services, amenities and infrastructure are provided.
If of 2100 units scheduled for Southleigh only 1100 would be delivered by 2036, is it beyond the scope of the HBLP to allocate land for development beyond the 1100 units?
We are aware there is uncertainty about the rate of development across the District as a whole. In particular, it is evident that the site known as Southleigh has serious infrastructure issues.
Site yield assumes that this strategic site can only drip feed 50+ houses per year during the plan period. 100 a year should be assumed. This would also support infrastructure provision.
<b>Transport and other Infrastructure</b>
Concern over increased traffic in the area, especially on Southleigh Road and the area around Warblington crossing gates, as well as strategic road network more generally, exacerbating existing congestion.
Concern over road safety at Warblington School.
Site Opportunities and Constraints should include opportunity to provide a development which focuses on the use of sustainable non-car modes to access and move around the site.
Point d i) Need to ensure that the delivery of a 'sustainable community' includes transport sustainability and positively plans for walking, cycling and public transport.
A relief road is urgently required.
Need for a broader review of the use of Warblington train station and facilities, to cope with increased demand from the Southleigh site, including the current lack of any layby for pickup/drop off, a footbridge for pedestrians and absence of any toilet facilities.
HBC must be clear on the commitment of public funding and public delivery of the A27 junction. This is fundamental to the masterplan vision. It is also fundamental to clear knowledge of intended phasing of new homes and other infrastructure.
It is absolutely vital that the junction onto the A27 is actually built.
The new link road is a priority. This road should be built before any new developments in the Southleigh area are given planning permission. It will relieve a huge amount of pressure on the existing roads.
Policy should include clear trigger for the delivery of a Junction from the A27 (suggest early phases of the development).
Schools, doctors and hospitals are at capacity.
The Local Plan should not prescribe one single outline application for Southleigh, but rather apply the principle of a Development Brief that can guide the submission of phased schemes.
Landowners/developers are going to make significant profit - land value uplift should be captured for the good of the community; Government must be lobbied for this.
Pressure on infrastructure (community, social, transport) - How will improvements be infrastructure be funded?
The idea of another junction to/from the A27, which would mean two junctions within a kilometre of each other, is not plausible.
How will developers be compelled to deliver the infrastructure?
Ahead of the Revised Draft Local Plan and/or a planning application submission Highways England would like to work with the council to assess the deliverability of the Southleigh site and the proposed new access onto A27. Given the potential impact of the development on the A27 it would be expected that any potential adverse impacts to the safe and efficient operation of the SRN be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3, as well as the NPPF and Circular 02/2013. To date, Highways

England have not seen any evidence that a new access onto the A27 to facilitate growth at Southleigh is deliverable and could be designed in conformity with the Design Manual for Roads and Bridges. We would welcome further discussions on this policy. Until this has been done, there is a risk that the policy would not be sound if growth at Southleigh is reliant upon a new access onto the A27 to be deliverable.

HCC support the use of a Masterplan for the site in order to coordinate land-use and transport and to ensure that the delivery of a 'sustainable community' includes transport sustainability and positively plans for walking, cycling and public transport. However there is no evidence that the provision of bus routes to serve the site is a commercial proposition for the local bus companies or that the development can deliver cycling and walking connections to the local shops, facilities and railway stations which therefore puts into question the whole tenet that a development of this number of dwellings can actually be sustainable in transport terms and not rely solely on the private car.

Point d iv) Evidence has not yet been provided (in the form of the borough wide Transport Assessment or planning application TA) to prove that a new junction on the A27 is needed. In addition there is no guarantee that the development of 2,100 dwellings can fund and deliver a new access to the A27 therefore if the junction is essential for the development then additional ways to fund the junction will need to be investigated.

Point d viii) There is also no evidence that providing additional bus routes to serve the site is a commercial proposition for the bus companies.

Concerns over drainage implications for Chichester Harbour - development should not result in pollution of the Harbour or flooding problems in the area.

The south east section of this site is designated as a Flood Zone.

Flood attenuation ponds should be managed to avoid mosquito problem and the associated health risks.

Maintenance of SuDS by community / management companies could be problematic.

Concern about flood risk / High water table / presence of springs makes surface water drainage problematic.

The Environment Agency has previously raised concerns regarding this site and some of the issues around flood risk and specifically flood storage. The site opportunities and constraints refer to areas of Flood Zone 2 and 3, in addition to land which is safeguarded for flood storage needed to reduce the probability of flooding to properties in Selangor Avenue. It is not clear, however, how these constraints have been taken into account in assessing the suitability of the site for development, or in shaping the policy requirements. We strongly recommend that the Local Plan better reflects the flood risk both in the policy wording and supporting text/evidence base documents. The flood easement area should remain free of development and any supporting flood risk management infrastructure, including surface water management (attenuation basin and other sustainable drainage measures).

We will look at any proposals for development to ensure that there is no increase in flood risk to downstream properties or further burden on public expenditure from increased maintenance and operation of publicly maintained structures.

Taking account of the above we would suggest that the assessment of the site and its policy within the sustainability appraisal is drawn into question in relation to objective 5 (reduce flood risk). We would not agree that the site and its criteria are going to have a positive effect on flood risk. As it currently stands it is likely that the effective will be a negative one.

#### **Other issues causing concern**

No faith in proposed plans, as recent developments have been poorly planned and many promised improvements have not been delivered (eg Warblington foot bridge; traffic calming; insufficient parking; play spaces).

There is no consideration of the impact on the lives of the existing residents.

Concerned about noise impact of spine road.

Concern that development will interrupt green corridors and restrict wildlife movement from the coast to the South Downs.
Concern over sufficient consideration being given to wildlife (incl trees, hedges, open spaces) in design, development and maintenance of the site.
Concern over loss of privacy / noise nuisance / reduced quality of life/ loss of peace & quiet / reduces security in existing adjacent developments.
<b>Development Requirements / Masterplan details</b>
The status of the masterplan is unclear (lack of clarity and justification). It does not provide enough clarity and direction for prospective developers. In order for the document to have significant weight, it should be subject to formal public consultation and be itself formally adopted as policy.
Supports the proactive approach of Havant BC in producing masterplan.
From a connectivity point of view, it should be considered that Emsworth Station could be used as a transport link with regards to getting to/from the Southleigh site. Network Rail should be consulted.
Natural England strongly recommends that a comprehensive ecological mitigation strategy is secured for the site that achieves net biodiversity gain and this requirement should be included in the policy text.
Would like public house included on site.
Masterplan should include facilities and activities for older children / young people.
Would like walking links to the coast directly south of the site.
There is a missed opportunity in having a clear walking / cycle / road routes to Emsworth & Havant train stations that would encourage people not to use their cars to commute to work.
Proposed green space in the Southleigh Master Plan should receive protection from any further development by being appropriately designated.
Public open space within the site should take pressure off Chichester Harbour, in particular it should be designed to be attractive to dog walkers.
Spine road should pass through proposed local centre to support the businesses.
Site should be developed using the principles of shared space for cars, cyclists and pedestrian.
Consideration should be given to requiring a secondary school.
Support requirement for primary school.
Will a school bus be provided for the school recommended in the plan?
Consideration should be given to requiring a doctor's surgery.
Criterion d does not currently make reference to the use of land to the south of the A27 for commercial and highways services uses, as set out on the Masterplan.
Open space should be in the middle of the site, separating the two communities.
Open space should have wild elements, not just orderly man-made open space.
Homes will not be affordable to local people.
Why high density housing here? Other areas are far less developed.
Support for requirement to contain community food growing provision.
Suggest part of site should be specifically for affordable / low cost housing for first time buyers.
Sufficient parking (for visitors as well as occupiers) must be provided.
Lack of attention to existing heritage features (listed buildings).
There should be an amnesty strip around existing houses.

Support that masterplan on East side of Eastleigh Road has tempered the desire to obtain the best views for the developer of Southleigh House with those of existing residents.
Detailed suggestions made for alignment of the spine road.
Extra Care should be provided in site
Green areas should be more fairly and evenly spaced out on the new development. The current plans seem to show a significant bias of areas to the East. Area of green on the west side should be widened and a significant corridor created.
Question final masterplan option - suggest that more people wanted a separate settlement.
The original parkland to the south of Southleigh Park House must be protected from inappropriate development that would harm the setting of the listed building and the open character of the historic parkland.
Historic England welcome criteria b i and d xii of Policy KS5, but consider that the Policy should require the retention of the properties on Eastleigh Road and the settings of all the listed buildings (grade II listed 1 and 2, Eastleigh Road, and is potentially within the setting of the grade II listed East Leigh Farmhouse, the barn to the to the west of the Farmhouse, Southleigh Park House and the Clock Tower Building in Southleigh Park) to be respected in any masterplan/development brief, allocation policy or development proposals for this site in accordance with the protection afforded to designated heritage assets by the Framework. HE would also like to see a requirement in the Policy for proposals to actually be informed by the Heritage (Impact) Statement.
Given the acknowledged “high potential for previous unidentified archaeological deposits”, a detailed archaeological assessment should also be required with a planning application and, if not included within the Master Plan principles, Policy KS5 should include a requirement that, wherever possible, archaeological remains are preserved in situ, preferably within areas of open space. Has reference been made to the Hampshire Historic Landscape Assessment?
Density of development here should be taken into account when further North Emsworth development is under consideration.
Masterplan lacks rationale and justification for the link road.
Given function of spine road, it seems unlikely that this road will ever be as suggested in masterplan.
There is no justification for the route of the spine road and no alternatives discussed.
Number of units should be increased South of Southleigh Road to decrease density in northern half of site
Existing cul-de-sacs should not be opened up as through roads.
Roads in Manor Farm development are privately owned and maintained. Pedestrian and cycle links to/from Southleigh would cause upkeep and liability issues for private individuals.
If flats are to be built, the flats are central to the development or along the motor way for ease of access to major roads.
Local centre should be more central to the development.
Concerned about suggestion of higher density development close to existing farmstead.
Support capping of Eastleigh Road in Masterplan.
There are potentially major conflicts between the implementation of a new engineered link road for commercial traffic with associated infrastructure, and (i) residential amenity, (ii) the safe east-west movement of pedestrians and cyclists across Southleigh, and (iii) the protection of the historic parkland. There is no estimate of the volume of traffic that may use the road.
Little consideration has been given to traffic coming from Denvilles (Southleigh Road) and heading north and west. Since this traffic cannot use Eastleigh Road it will go along the blue neighbourhood street that is proposed to the NW of Eastleigh Road. The new road is likely to become a rat-run, just like Eastleigh road is now.

The site has no existing on-site rights of way. HCC suggest that a requirement of development at this location should be the development of high-quality multi-user routes in green corridors going both east-west and north-south, linking into the existing rights of way network, where appropriate. In addition, Havant Footpath 71 crosses the south-eastern corner of the site, providing a convenient crossing under the A27. Providing additional cycle access rights over this route will help support sustainable travel between Emsworth, Southleigh and permissive routes across Southleigh Forest. HCC therefore request that this policy is amended to protect this route, and provide additional pedestrian/cycle links to it, where possible.

The creation of 2,100 new homes within 1.25-3km of Staunton Country Park, which is a HCC Countryside Site, will substantially increase the recreational pressure upon this asset. To mitigate for this impact, we request that a substantial contribution towards enhancing the country park form part of the allocation policy.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The site is capable of delivering around 12% of the housing need for the plan period. The council is satisfied that the evidence base supports an allocation for a site yield of around 2,100 dwellings, which was based on extensive masterplanning work. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether and how the policy and/or the masterplan should be amended to:

- Address the concerns of the Environment Agency and others regarding flood risk, flood storage and drainage. The Council will work closely with the Environment Agency to improve the evidence base and the policy to resolve these concerns
- Require a comprehensive ecological mitigation strategy and achieve net biodiversity gain
- Protect green spaces provided within this development from future development
- Make clearer reference to the intended use of the Land to the south of the A27
- Make clearer reference to the need to retain heritage assets
- Bring forward deliverable solutions to site access and permeability

The trajectory (AMR 2017) shows 100 dwellings per annum for Southleigh in years 2025/26, 2026/27, 2027/28, and 800 for 2028/29 - 2035/36 giving a total of 1,100 in the plan period.

It remains the Council's ambition to deliver a comprehensively planned scheme for this site and avoid further parcelling off of smaller sites. While this approach remains fundamental to planning of this site, it is acknowledged that phasing is crucial to the successful delivery of large sites. Therefore, there is a need to consider further how phasing and triggers can be reflected better in the evidence base (viability assessment and masterplan) and in the policy itself, or through additional planning documents. Any such phasing plan will also have to consider the delivery of infrastructure relative the timing of development phases.

The Infrastructure Delivery Plan (IDP) which accompanies the Local Plan looks specifically at the infrastructure needs of the Southleigh site. Infrastructure items that need to be delivered on site, such as the primary school, have been identified in the policy, so that developers have the clarity from the outset that they will be expected to provide them within the development. In terms of transport infrastructure, the impact of this development on the surrounding areas, and any mitigation measures, including the proposed A27 junctions and link road are being examined through the Borough wide Transport Assessment (TA), which will inform the next version of the plan.

The following detailed matters raised in the comments, while being considered in the masterplan, are also for consideration in further detail at the site planning stages and are covered by policies in the Local Plan:

- Detailed design (E6 and E7)
- Provision on site open space and wider green infrastructure (E2)
- Landscape and Townscape (E10)
- Transport and Parking (IN2)
- Site specific impacts on the road network (IN3)

- Access and through routes (IN3)
- Residential amenity / Noise (E6 / E20)
- Wildlife / Ecology (E15 / E18)
- Solent Special Protection Area (E16)
- Historic Environment and Heritage Assets (E9)
- Drainage and Flood Risk (E12 / E13)
- Affordable Housing and Housing Density and Mix (H2 / H3)

## KS6 - Dunsbury Park

4 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Policy is supported including extension to include the 3<sup>rd</sup> phase.

Dunsbury Park business development looks excellent.

The local MP and council leadership are promising thousands of high end new jobs from Dunsbury Park on the basis of one translocation of a distribution centre of a Havant based business (Fat Face). Some residential development on Dunsbury Park site could save greenfield sites elsewhere in the borough.

Phase 3 has potential to conflict with the success of the woodland & protected species mitigation / compensation strategy for Bells Copse and Havant Thicket - need to consider in-combination effects on woodland and protected species.

Phase 2 has capacity to provide up to 15,000 sq. m (increase from 10,000 sq. m).

Relaxation on use class restriction is supported and reflects current s73 application under consideration.

There is a need for sufficient transport links to/from Dunsbury Park.

Need to recognise the importance of the motorway bridge over the A3(M) as a green infrastructure route, with a large residential population within a 4.5km cycling catchment west of the motorway and potential for health and wellbeing benefits.

Amend (i) (viii) to refer to the need to; enhance green infrastructure routes between Havant Thicket Reservoir, Dunsbury Park and Cowplain.

Improvements to cycle infrastructure could increase the number of journeys to work by these means.

Policy should be strengthened to require cycle access to active travel routes (other than Park Lane).

Recommendation for a comprehensive mitigation strategy to ensure that net biodiversity gain and appropriate mitigation is required for Bechstein's bat and hazel dormice. Need to ensure the importance of this site within wider ecological corridor for woodland and wetland habitats.

Need to integrate mitigation measures for Bechstein bats within the design and layout, including existing bat corridors.

Mitigation measures for Bechstein's bat are not tested - need for long-term monitoring.

Welcome requirement for Heritage Statement but would like to see a requirement in the policy for proposals to be informed by the Heritage (Impact) Statement

Given the potential impact of the site on the A27, it is requested that any potential adverse impact to the safe and efficient operation of the Strategic Road Network (SRN) is appropriately considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013.

Add poor access for walking and cycling as a site constraint, with no link from the site westwards across A3(M) towards Waterlooville by foot, cycle or bus.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor amendments.

In addition, consider the following:

- Whether the part of the policy relating to Phase 2 should be amended to allow for up to 15,000 sq. m of employment floorspace.
- Reference the bridge crossing on the A3(M) as an important pedestrian and cycle route in the Site Opportunities and Constraints.

- Reference the potential to enhance pedestrian and cycle links in the Site Opportunities and Constraints.
- An additional criterion to ensure the safe and efficient operation of the SRN.
- Whether there is a need to amend the policy to reflect the significant archaeological potential of phase 2, and include developer requirements for mitigation.

Explore whether policy should be strengthened to refer to / require improvements to provide access to other active cycle routes.

The forthcoming Havant Biodiversity Strategy will consider the importance of this site within the wider ecological corridor for woodland and wetland habitats informed by the ecological network mapping work undertaken by the Local Nature Partnership (LNP). The policy as proposed, including the developer requirements will therefore be updated to reflect and incorporate the recommendations of the forthcoming Havant Borough Biodiversity Action Plan (BAP) as appropriate.

Investigate whether there is a need for long-term monitoring measures for the Bechstein's bat with the mitigation measures proposed in accordance with E18. Consider whether there is a need to strengthen the policy wording relating to mitigation measures as part of the overall design and layout of the proposed development.

Comments where no change is considered necessary:

As well as meeting objectively assessed housing needs, the Draft Local Plan must also meet the Borough's employment floorspace need of 82,780 square metres (as set out through Policy C1). Dunsbury Park is a strategic employment site of sub-regional and local importance which has the potential to meet a significant proportion of the Borough's employment floorspace requirements, and is accessible from the A3(M).

There are various provisions within the S106 agreement and Framework Travel Plan attached to the outline consent (reference. APP/12/00338) which are designed to improve pedestrian and cycling links to and from the adjoining residential areas. This includes pedestrian and cycle links to the south and east of the site towards Leigh Park and an A3(M) footpath/cycleway to the west towards Waterlooville.

The Travel Plan requires the development plots to maximise opportunities for travel to the business park and hotel development by means other than the private car. Accordingly, criterion i. x. of the policy requires a Travel Plan for each plot and/or phase to be submitted in line with the Framework Travel Plan. The Framework Travel Plan also sets out a strategy for cycling to encourage staff to cycle to work.

## KS7 - Havant and South Downs College

5 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Increasing the capacity of the college is supported.

Increased requirement for public transport.

Havant Bridleway 28 and Havant Footpath 26c adjoins South Downs College. HCC request that this policy be amended to require additional pedestrian/cycle links to the local rights of way network, where possible.

Add that development at both campuses must support sustainable travel modes with excellent pedestrian and cycle links and bus facilities.

Havant Campus - Add to criterion f. and 'promotes access by walking and cycling through the provision of shared off-road routes and improved crossing facilities on the B2149 Petersfield Road and Petersfield Road/New Road roundabout'.

South Downs site - Add to criterion g. and 'promotes access by walking and cycling through providing off-road shared use cycle routes, an improved pedestrian route from the site to Crookhorn bus stops including a signalised crossing facility at the college entrance'. Also need to improve bus stop facilities on College Road and work with bus companies to ensure the site is adequately served by a number of bus routes.

Havant Bridleway 28 and Havant Footpath 26c adjoins South Downs College. To support sustainable travel, HCC request that this policy be amended to require additional pedestrian/cycle links to the local rights of way network, where possible.

Support efforts to address the skills gap through draft Policies KS7 and KS10 requiring high quality design in the provision of new and improved educational facilities, and an inspiring built environment.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether it would be appropriate to secure developer contributions towards improved pedestrian and cycling routes and bus facilities/stops as part of the development and redevelopment at the two campuses.

In addition, investigate opportunities to strengthen sustainable transport links at, and between the two campuses in collaboration with Havant and South Downs College.

## KS8 - Havant Thicket Reservoir

6 responses were received regarding this topic

### Summary of comments raised by residents and other stakeholders

Support principle of the reservoir and pipeline route.

Concern over residual flood risk to development downstream and the reservoir should therefore be justified sequentially in terms of its location, and catchment-wide flood probability and consequences understood and mitigated.

The route of the proposed pipeline follows, to a large degree, the route of existing main rivers. Any works within 8 metres of a main river require a Flood Risk Activity Permit from the EA.

Impacts upon the rights of way network and nearby country park should be considered. Any diversions should provide a high-quality route.

A comprehensive mitigation strategy will be required for this development to achieve net biodiversity gain and address the site's constraints which include impacts to ancient woodland, Bechstein's bat and hazel dormice and to ensure the strategy secures landscape scale biodiversity enhancements. Mitigation measures should be in place at the earliest opportunity. There is potential for this site in combination with KS6 to significantly impact the viability of the local Bechstein's bat population.

Concern that the current wording of Policy E18 may create a barrier to obtaining planning permission for the Havant Thicket Reservoir. The development of KS8 will not be able to show no net loss of woodland; instead Portsmouth Water's mitigation strategy would be focused on ensuring that connectivity is maintained between the woodland blocks north and south of the proposed reservoir by planting a new woodland strip east of the reservoir and enhancing boundary hedgerows.

The Park and Garden is Grade II\* Registered, not a Grade II\* listed building as the third bullet point states.

Points (l) should be headed "Natural and rural character and historic significance".

The construction of this proposed reservoir would result in the loss of part of the historic Avenue, part of the Registered Park and Garden, and Conservation Area. Whether this loss would amount to "substantial" harm and whether the public benefits of this proposal are such as to outweigh the harm are matters for full and proper consideration if and when a formal planning application is submitted, and full details of the proposed reservoir and associated infrastructure are known, but at this stage we object to Policy KS8 based on the site shown on Figure 14a.

Points (h) and (i) of the policy should be amended to give more flexibility over potential access arrangements.

Concern that wording of policy suggests blanket ban on development in the pipeline buffer zone. Proposed wording change.

More information should be included in the draft Plan on when Havant Thicket Reservoir will be needed.

The area to the west of the reservoir should be included for regeneration e.g. the flats on Swanmore Road

Parts of the thicket could be developed to provide leisure and a visitor centre to make it a destination in its own right

New leisure activities such as a viewing tower or bridge at the reservoir, canoeing/dingy sailing and club house (in partnership with local schools and colleges), and walks around the new reservoir, maybe a café.

A walking/cycling route along the new pipeline to the reservoir should be defined now.

Section 3.118 should be expanded to consider the impact of the Borough as a whole, with provision for housing, which will enhance the environs of the reservoir, and bring possibly more mixed income residents to an area which is one of the most deprived wards in the Borough, as well as planning for the leisure development of the site.

The site supports features of significant biodiversity interest including priority species and habitats.

Previous survey work has shown that Bechstein's bat utilise KS8 for foraging; a maternity roost has been recorded using parkland trees adjacent to the site also.

Whilst Portsmouth Water do not predict a deficit in the period covered by the Water Resources Management Plan (meaning that construction of the reservoir would not be necessitated) their capacity to supply water depends upon their resources remaining available.

Supportive of moves to embed resilience, and to deliver regional solutions to water shortfalls which would prevent other potentially damaging schemes being required elsewhere.

The scheme could make a valuable contribution towards ensuring that water resources across the south east are more secure and more sustainable.

Points (i) and (j) in the policy are supported.

#### **HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider the following:

- Whether flood risk has been adequately addressed
- Full and proper consideration of the loss of part of the historic Avenue, part of the Registered Park and Garden, and Conservation Area
- Point (j) should reference Rights of Way and ensure new path provision is of high quality
- Whether an ecological mitigation strategy should be required and specifically referenced in the policy
- Greater flexibility in points (h) and (i) over potential access arrangements
- Whether the wording related to the pipeline route should be amended
- Amend point (l) to "Natural and rural character and historic significance"
- Amend site opportunities and constraints to reflect correct designation of Park and Garden

Comments where no change considered necessary:

Flood Risk Activity Permits are not within the remit of the Local Plan to address.

The final paragraph in Policy E18 is considered to comply with the Habitats Regulations which a planning application for the reservoir would have to meet.

The timing of the delivery of the Havant Thicket Reservoir is a matter for Portsmouth Water and is not considered necessary to reference this in the policy or supporting text.

The Council do not routinely allocate swathes of privately owned residential areas for redevelopment. Therefore, it would not be considered appropriate to allocate Swanmore Road and surrounding areas for redevelopment.

Leisure facilities are specifically referenced in the policy. Whilst a visitor centre is not explicitly mentioned, it would be supported through the policy. Other leisure activities are not precluded by the policy and would be supported in principle.

The policy requires that regeneration opportunities arising from the new pipe works enhance cycle and pedestrian accessibility.

Concerns regarding ecology will be addressed through an Environmental Impact Assessment (EIA) and Environmental Statement.

## KS9 - Berewood and Wellington Park

2 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The inclusion of the key site is welcomed.

Suggestion that number of dwellings in the policy is amended to approximately 3,000 new dwellings to reflect approved outline consent for Berewood.

Flexibility needed to allow for market changes over the course of the build out programme and minor changes to the previously approved scheme.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider whether policy should be amended to make reference to 'about 3,000 new dwellings' to reflect the above, and for the purposes of consistency throughout the plan.

## KS10 - Langstone Technology Park

5 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Lack of detail in relation to proposed development.

Reference to 'pocket homes' in news article.

Concern in relation to traffic impact and journey times.

Need for sufficient transport links to/from Langstone Technology Park.

Highways Assessment is not yet complete - need to assess cumulative impact of development.

Consideration should be given to the use of the Harts Farm way entrance.

Support increasing employment opportunities on a brownfield site.

The available car parking area should be highlighted, and options considered for the most efficient use of this space.

Highways England will review any future consultation once it is available.

Paragraph 3.135 - Delete 'public transport hubs' and replace with to 'better connect it to Havant town centre and Havant railway and bus stations'.

Add need to promote access by all sustainable modes including the Bus Rapid Transport bus route.

Support efforts to address the skills gap through draft Policies KS7 and KS10 requiring high quality design in the provision of new and improved educational facilities, and an inspiring built environment.

Access to Langstone Technology Park could be improved by slip roads direct onto the A27.

### HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage.

There have been no site-specific constraints which have been raised which indicate the site is not deliverable or should not be allocated in the HBLP2036.

As the local planning authority, the Council will also need to independently determine an appropriate and sustainable framework for the delivery of the site including access considerations, and balancing the aspirations of the landowners, owners, tenants and communities. As such there will be substantial revisions to the policy as proposed in the regulation 18 draft of the HBLP 2036, which will incorporate the recommendations from the transport analyses.

# Infrastructure

# IN1 - Effective Provision of Infrastructure & Infrastructure Delivery Plan

33 responses were received regarding IN1 and 16 responses were received regarding the IDP

## Summary of key comments raised by residents and other stakeholders

### Amount of thought given to / evidence provided on Infrastructure

The Infrastructure Delivery Plan remains incomplete until the Highways Assessment is published, critically appraised and solutions, not just mitigation, identified and implemented. Further consultation on IDP requested once Transport Assessment has been completed.

This plan is not thought out properly. Do the people who put planning forward not speak to the local people who know the area?

Object to development / concern about effect proposals for new housing will have, not only on traffic but also on schools, health provision, etc. and whether sufficient thought has been given to these issues.

The part of the report which talks of infrastructure is very mild in tone

Building homes on greenfield land takes away land needed in future for infrastructure

PUSH must continue to establish the cumulative effect of numerous new developments and the considerable increase in population over time in the entire PUSH region so that the wider infrastructure is put in place in a timely fashion.

The limited number of community projects included will only come to fruition on the back of revenues made available by developers to HBC. Therefore the plan is devoid of major infrastructure projects such as:

- Cultural and entertainment centres
- Open town centre meeting places to see and be seen in, including worthy architecture
- Rapid transport networks
- Railway and secondary road improvement and expansion

In previous developments very little was done to create communities. The result of this are characterless morasses of rather unspectacular houses. What plans are there to create community centres, shopping areas, schools and health centres? What are the plans for full and proper staffing, given that there is already a national problem with recruitment to these professions?

The local plan should be about ensuring the current local population enjoy the same, if not better, conditions than that of the past and not just wholly focused on new housing.

So many new houses & flats in the area but what about extra doctors surgeries & hospitals, police & schooling

The Council is pursuing housing over the environment to obtain government revenue, to the detriment of the Borough.

### Policy IN1

Infrastructure should be in place or in parallel with new development.

Page 74 bullet point f: it is essential that SuDS systems are adequately maintained, so it is good that maintenance is part of the policy.

Southern Water supports the inclusion of Policy IN1, which effectively addresses the need for new development to consider the provision of the infrastructure necessary to support it.

IN1 could be more explicit in its support for utility providers to deliver the strategic level (as opposed to just local level) infrastructure needed to accommodate growth in general, throughout the district (wording suggested)

Add reference in policy to the need for development proposals requiring a full transport assessment. Eg Planning permission will be granted where it can be demonstrated that .... A full Transport Assessment for the new or improved infrastructure has been submitted as determined by the Highway Authority.

HCC welcome that point a.iii. makes reference to public rights of way. HCC do however request that reference is also made to recreational facilities, such as Staunton Country Park and Staunton Farm.
Hampshire County Council as a landowner and a public service provider support the intention to work in partnership, with specific reference to 4.11 (ii) - new and expanded schools
Support for 4.11 viii on Green Infrastructure
This policy is supported in general terms however the Council must ensure that any infrastructure improvements sought are directly related to the development and meet the CIL regulations. The CIL 123 list should be updated as required.
Support for inclusion of sports and recreation facilities within the types of infrastructure that the council will either seek on site provision of or contributions to off-site provision to make the development acceptable. Playing Pitch Strategy once adopted should be used as the basis for guiding such contributions or on-site provision as it will constitute a robust and up to date assessment of need for sport for the area
Policy IN1 (vi) Transport is useful, but minor adjustments around a specific site does not deal with the fundamental problem of the overall capacity of the road or its ability to handle any increase in load.
The emphasis on providing the necessary infrastructure before, or simultaneously with, new development is wholeheartedly supported. We recognise that some infrastructure, rather than preceding a development comes about as the result of increased need stemming from, amongst other things, an increase in population. Hence the retention of land to support infrastructure improvements such as for doctors' surgeries and education facilities is supported. This must be rigorously enforced and not fall victim to the need to demonstrate a 5y housing land supply. It is important that this does not apply simply to infrastructure devoted to that development but includes the wider infrastructure requirements across the local area.
Support for aims of IN1, but policy could be clearer on the expectations for infrastructure planning
There is a great deal of information in the proposed plan on what should be done, guidelines to be followed but much less on solutions to obvious problems
The policy states that planning permission will be granted for development that meets on-site and/or off-site infrastructure requirements including for water supply, waste water and sewage disposal. In terms of water supply this should include consideration of solutions such as rainwater harvesting and grey-water recycling. As well as significantly reducing the use of treated drinking water, such interventions can deliver additional benefits for localised water management by reducing volumes of runoff or discharges of waste water from a site.
West Sussex County Council support the reference in Policy IN1 to timely on-site and off-site delivery of infrastructure, which includes transport, education, social infrastructure and emergency planning. However, it is considered that this policy should set out the need for phasing development where required to bring forward required infrastructure and state that Havant Borough Council will work with partners in the delivery of infrastructure, which could include providing mitigation outside of the Borough.
Policy / supporting text should acknowledge cross county boundary impacts
Highways England is supportive of policies IN1, IN2 and IN3, which align with the principles of NPPF, its soundness requirements, and Circular 02/2013 and will help to mitigate any impacts of Key Sites 1 and 2 on the SRN.
The Environment Agency supports the inclusion of green and blue infrastructure in this policy and in the supporting text the requirement for developments of 5 or more new homes to be accompanied by a comprehensive infrastructure delivery statement. This should help ensure that relevant infrastructure is provided in the right place at the right time.
IN1 a iii Green and Blue infrastructure should explicitly include cycling and walking
4.6 a Transport and highways should explicitly include cycling and walking.
Amendments suggested to policy and 4.14 to clarify that brownfield sites listed in policy H1 area also considered to be 'allocated sites' for the purposes of this policy (wording suggested)

It is noted that proposed housing allocations do not clearly indicate that infrastructure requirements will need to be fulfilled in the granting of planning permission with the exception of Southleigh and those developments which border or are near to Morelands School.

The Education and Skills Funding Agency welcomes reference within the plan to support the development of appropriate social and community infrastructure, and in particular draft Policy IN1

### **IDP: General Comments**

The infrastructure plan failed to fulfil both my hopes and expectations. I would have like to have seen a clearer and more insightful vision, here, both in terms of social and technical infrastructure.

Maps and diagrams should be used to illustrate the planned provision of infrastructure

Appendix 4 titled 'Infrastructure Solutions' contains significant risks in the column titled 'funding shortfalls'. These shortfalls are (a) incomplete in places and (b) where they are known the overall total is already a substantial amount of money. I also note that some of the timeframes listed go beyond 2036.

### **Early Years**

The borough council is asked to note that for every 500 homes approximately 44 new early years places will be required for children aged between 2 and 4. This number could potentially be doubled to meet the demand from working parents who may require places for very young children aged 0 and 1 and for the Government's 30 hours childcare policy. Therefore these numbers are a minimum.

Where smaller developments are noted of typically less than 50 units it is probable that early year's needs can be met by existing provision. For larger developments, consideration should be given to seeking developer contributions that include the provision of early year's places. HCC assume these are covered under the council's policy IN1.

### **Education**

The Education and Skills Funding Agency notes that significant growth in housing stock is expected in the borough. This will place additional pressure on social infrastructure such as education facilities. Ensuring there is an adequate supply of sites for schools is essential.

The Education and Skills Funding Agency supports the principle of Havant Borough Council safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary

In light of skills challenge in the area, it would be helpful if the council (in partnership with the county council) produced a spatial analysis of primary and secondary school performance and social deprivation against proposed areas of housing growth and the provision of new and improved educational facilities. While developer contributions will only pay for new school places generated by the housing development, the improvement of educational facilities may also benefit the local population.

The Education and Skills Funding Agency welcomes the detailed analysis of existing school capacity, ability to expand, needs arising from development and the costs of provision, as set out in the Infrastructure Delivery Plan (IDP). This comprehensive assessment is considered to be a strong basis for the education requirements set out in draft Local Plan policies.

In light of the infrastructure challenges often faced when delivering large schemes (KS5 Southleigh) and delays these can cause in housing delivery, the Council may be interested in emerging Education and Skills Funding Agency proposals for forward funding schools as part of large housing developments. We would be happy to meet to discuss this opportunity at an appropriate time.

Draft site allocation Policies H15, H41, H44 and H45 all require an appropriately scaled contribution to the expansion of Morelands Primary School or the provision of a new primary school. The Education and Skills Funding Agency welcomes this approach, but recommends an update to the supporting text to ensure consistency between the Local Plan and the IDP. At present, the supporting text for the policies refers to the need either for an expansion of Moreland School or the provision of a new primary school within one of the development sites. However, the IDP states that Moreland School can only expand to two forms of entry, while land owned by the borough council and currently used as informal open space would be available for

further expansion of Morelands School to the three forms of entry required as a result of these housing developments. The next version of the Local Plan should reflect the latest position agreed with the county council

While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The ESFA therefore recommend the Council consider highlighting in the next version of the Local Plan that: - specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that - requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.

Hampshire County Council as a landowner and a public service provider support the intention to work in partnership, with specific reference to 4.11 (ii) New and expanded schools are planned in conjunction with Hampshire County Council, in liaison with the individual schools.

Consider that estimate of pupil space needs in Emsworth (Table 4, Local Plan) is an underestimate. Suggest estimate should be based on survey of school children at Redlands Grange.

### **Emergency Services**

The emergency planning is a joke and needs someone to be accountable for developing it! Currently it's a list of nice to haves.

Police have not performed well in the past.

### **Green & Blue**

The Victorian ethos of providing parkland for all residential areas should be emulated.

Havant should develop its own 'Green Chain' as in London

### **Health**

With the amount of houses planned north of Emsworth any new doctors' surgery at Redlands Grange will be oversubscribed before it opens and that means there will still be a need for a surgery in the centre of Emsworth.

Key concern for Clinical Commissioning Group is to ensure that workforce is available to meet the needs of any additional population forecasts. The model of care is changing in order to meet unprecedented demand and in recognition of the fact that GPs are a scarce resource. This influences the way that health services are being commissioned.

Acute hospitals are under significant pressure to meet demand; however, we are fortunate that Havant residents have the high quality modern Oak Park Community Clinic and access to local community (nursing home) beds.

In order to meet the additional demand on health services that new housing will bring, Clinical Commissioning Groups would wish to apply for s106 or CIL Contributions on individual schemes on behalf of local GP practices, to enable targeted infrastructure improvements for existing local practices to ensure that quality of service is not compromised. Whilst the Department of Health funds population growth on a retrospective per head basis, this forms part of the allocation of funding which the CCG receives annually. Infrastructure to support health services is not budgeted as part of the allocation given to CCGs.

Capital funding for health infrastructure in the NHS is incredibly scarce and difficult to secure, therefore obtaining funding through planning obligations is critical to meet the needs of the healthcare infrastructure which is and will be required to meet demand for services. To achieve this, the Council is requested to amend its CIL Regulation 123 List in order to secure developer contributions through future planning obligations.

Borough population is increasing, but health provision is reducing. As part of the plan it should be possible to investigate the provision of 'incentivised GP practices', as pioneered by the Docklands Development Corporation

The crying need in Emsworth right now is for more GPs, a bigger, better surgery and more NHS dentists.
<b>Social</b>
Why is Emsworth Library moving back on your agenda? The central town site is perfect for people using it and if you want to move it to the Community Centre, which as you mention, is a busy place with lots going on, the library with its number of users will not have sufficient room. And that's before you bring a lot more people in.
<b>Transport (Please also see table for IN2: Improving Transport Infrastructure)</b>
Cycling should be encouraged - important for health; more attention should be paid to cycle networks
Investing in foot/cycle/public transport is essential but highway improvements are also needed.
Spine Road at Southleigh must come before development
Warblington Crossing is problem
Suggest paved public footpath along Portsdown Ridge
Where are the studies for the congested hotspots today? Current infrastructure must be improved before more homes can be considered
Local roads will not cope with all the extra houses planned around the Emsworth area, bearing in mind that the majority, which will come from the east and the north, will have to go through Emsworth, to access the A27.
One for the Highways Agency, there needs to be another access onto the A27 midway between Emsworth and Chichester, which would ease some of the increasing amount of traffic coming from the east.
Concerned regarding traffic congestion and air quality across the Borough and particularly where there is poor air quality around schools
The Havant Bus Station no longer functions well. The development of the Central Retail Park and the additional traffic lights that were needed together with increasing traffic generated by many new developments is causing long delays. As the plan runs to 2036 we feel that HCC should be looking at the possibility of relocation this very busy bus station in a less congested area.
Two well used cycle routes (Farlington Marsh / Eastern Road route into Portsmouth and NCN2 to Chichester) have problems including: Cycling accidents and narrow cycle track width on Eastern Road, difficult crossings of Rusty Cutter Junction, parking on cycle Lanes in North Emsworth, street parking in Westbourne Centre and a narrow partly on road cycle route along Southleigh Road. Both routes however help to reduce car use and enable many people to maintain better health and fitness.
Cycling access to schools has improved. Several new sections such as on Milton Road are good standard routes but it's still work in progress with a long way to go.
An overview of the present cycleway construction situation is given on pages 125 to 130 of the draft Infrastructure Delivery Plan - comments provides various statistics to improve this section
It's clear that high levels of cycling are possible in Havant. To achieve them radical changes will be needed in attitudes to cycling, standards and amounts of infrastructure provision in both Havant and surrounding districts and the development of a more comprehensive strategic network of cycle routes for commuting across the Portsmouth conurbation, including Havant.
The draft local plan doesn't suggest user capability levels or related construction standards for routes being proposed. If facilities are to be designed user requirements and construction standards are essential starting points. Local Transport Notes and Sustrans guides are useful starting points.
Community needs are likely to include: 1. Areas where young children can learn to cycle and get experience cycling. These would be off road in safe and reasonably flat locations. At present Havant Thicket plus some parks and off road routes, meet some but not all needs in the borough.

2. Routes to secondary school safe for all 11 year olds who have passed Bikeability level 2. Only 3 or 4 secondary schools in the borough have partial networks of adequate routes;
  3. Routes, from residential areas to utility destinations, where the majority of adults feel safe to cycle. Cycling routes to work, must be, fast, clean, direct and be safe. Few utility journeys in the borough have appropriate infrastructure. Problems include busy junctions, especially roundabouts, road crossings, fast traffic travelling too-close, broken up surfaces, repeated changes of route layout, (including on shared pavements where poor infrastructure can cause friction with walkers), unexpected narrowing of roads and rough, wet and muddy off road routes.
  4. Routes on which 12 to 14 year olds with Bikeability 2 could cycle unaccompanied, across town. (Only a few, off road and shared pavement routes are good enough to enable this group to cycle widely.)
- The above types of routes would enable most leisure cyclists to cross the Borough.

There are insufficient safe, direct, clean and continuous cycle routes across the borough connecting residential areas with town centres, employment sites, leisure centres and schools. Gaps in provision prevent or reduce many people's opportunities to cycle.

Highways England would welcome the opportunity to work with HBC to discuss the next steps in the development of the IDP and the Local Plan, to make sure that they are sound and that any identified mitigation (e.g. the new junction on the A27) has a reasonable prospect of delivery within the timescales of when the growth is planned. Once any further transport impacts of the Local Plan sites develop, the IDP should set out any SRN mitigation required to deliver the Local Plan development. For background, you may be interested to read "The Strategic Road Network Planning for the Future" which is a guide to working with Highways England on planning matters. Please see:  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/461023/N150227\\_-\\_Highways\\_England\\_Planning\\_Document\\_FINAL-lo.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227_-_Highways_England_Planning_Document_FINAL-lo.pdf)

### **Utilities**

We are concerned about capacity at Budd's Farm Waste Water Treatment Centre where there are frequent notified discharges at times of high rainfall.

Some of the additional development proposed in the plan will rely on foul drainage being treated at the Thornham Wastewater Treatment Works. Chichester District Council notes that the Habitat Regulations Assessment assumes that an upgrade to accommodate the additional development is feasible. Whilst in normal circumstances the Council could consider requesting Havant Borough Council to carry out further work, a current evidence base study to support the Chichester Local Plan is underway and will look at the cumulative impact of development on Thornham Wastewater Treatment Works. If necessary, officers will meet with officers from Havant Borough Council to discuss the implications of this study when it is available.

Appendix 4 | Infrastructure Solutions: In the booklet on infrastructure it states Budds Farm Sewage Treatment Works has the capacity to cope with today's demand, this is not true. Between 29 December 2017 and 6 January 2018 untreated sewage was released into Langstone Harbour from Budds Farm through lack of storage facilities. Stated reason was rainfall but there wasn't an unusually high amount of rainfall in that period. This shortfall in storage capacity must be rectified before the Draft HBLP 2036 is adopted or large developments are approved  
 Concerned about capacity at Budd's Farm Waste Water Treatment Centre where there are frequent notified discharges at times of high rainfall.

The Infrastructure Delivery Plan needs to be updated to reflect the fact that Portsmouth Water do propose to deliver the Havant Thicket Winter Storage Reservoir in the Local Plan period to 2036. Suggested text updates suggested.

### **Other Matters**

Emsworth Neighbourhood Plan Forum would expect that Emsworth would receive its share of CIL monies to be produced from the various developments in Emsworth.

### **Hayling Island (please also see 'Hayling Island (General)' table)**

On Hayling there is not enough infrastructure in place to keep building houses (roads, water mains, doctors, provision for young people; pressure on the environment)

Unlimited increased development and therefore added population on Hayling Island is unsustainable into the future. Hampshire Highways have to be compelled to accept that there is a limit to the amount of traffic that the existing road system and bridge can sustain. There should be a moratorium on development projects and the identification of potential sites on Hayling Island, until the Infrastructure study is completed to the satisfaction of Hayling residents and its findings implemented. This should be incorporated within the plan. Hayling's unique status as an Island and therefore not part of the Havant Borough mainland should be a central theme of the plan

Funding must be secured to safeguard future of Hayling Ferry

There is no mention of integrated transport at the Hayling Ferry

Increased cycling and Hayling Ferry would reduce traffic on A3023

Infrastructure Plan for Hayling must be agreed (and where appropriate implemented) before decisions on housing development are made (including one road, sewage, water pressure, schools, doctors and dentists, shopping, habitat)

Problems on A3023 don't only affect Hayling, they also affect Langstone

Can't see any plans for leisure facilities - suggest HBC should include this in the regeneration project

A significant area of Hayling Island lies at or below sea level, and is forecasted to be at significant risk of flooding as a result of climate change. We find it difficult to reconcile the aggressive blanket-building proposals for an area of high vulnerability where the sustainability of its infrastructure into the future is not certain.

There are four projects concerning the Hayling Island coast which are not understood by us. They can be found in Appendix 4 of the Local Plan (pages 354 and 355.) Three of these are intended to flood areas of the Island coast as new wetlands. We are told that they are in compensation for harbour encroachment by development elsewhere in the Solent area. We are also told that the projects have been approved, but no certification or project plans have been made available or published. The four projects are currently unfunded, with a projected cost of £8.1 million. These proposals seem to have been approved without any Island representation.

Use and transparency of CIL: Will CIL money from Hayling developments be ring fenced for Hayling. How will this information be available in an easy and transparent format for Island residents.

#### **HBCs proposed way forward for Regulation 19 HBLP2036**

A comprehensive Infrastructure Delivery Plan accompanies the Local Plan. It was published in draft alongside the Regulation 18 draft plan in order to allow representations to be made. The IDP will be reviewed, taking into consideration the comments on individual infrastructure requirements summarised in this table. A final version of the IDP will be published, and will inform the final version of policy IN1.

There is clearly support for inclusion of a policy in the plan governing the effective provision of infrastructure. Proceed with policy as proposed in the regulation 18 draft, with wording amendments to clarify what the expectations of the council are both of its partners, statutory providers and developers.

It should be noted that the spending of CIL funds is not linked to the development that the charge is collected from. How and where CIL funds are spent is a decision for the Borough Council in accordance with the adopted Spending Protocol. See

<http://www.havant.gov.uk/sites/default/files/documents/CIL%20Funding%20Protocol%202017.pdf>

## IN2 - Improving Transport Infrastructure

36 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Transport Assessment / Evidence Base

HCC as local highway authority raise a holding objection to the Local Plan until such time as the Local Plan Transport Assessment has been finalised and the strategic impacts of the proposed allocations, specifically Southleigh KS5, have been adequately assessed with evidence that any unacceptable impacts can be adequately mitigated.

HCC supports the methodology of HBC in preparing a borough-wide Transport Assessment (TA) and the use of the strategic model known as the Sub Regional Transport Model (SRTM) to assess the wider transport impacts of the strategic disposition of proposed development across the Borough.

The Draft Local Plan should be delayed until the results of the Borough Wide Transport Assessment and Analysis of the Transport Network on Hayling Island are available. It is unacceptable to proceed without details on transport proposal. People must be given the opportunity to comment on the results of the study once they are available.

It is impossible to make meaningful comments on Local Plan without this information.

Question whether the road network can accommodate the additional load

It is important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. Infrastructure and development policies should be planned at the same time, in the Local Plan.

The Transport infrastructure is missing from the plan - the single most import improvement that could be made to Havant and Hayling Island

As the requisite Assessments have yet to be completed, it is not possible to fully identify and quantify the required infrastructure investments. Accordingly, the Council cannot be certain that its proposed allocations are appropriately located and capable of delivering infrastructure solutions. This casts doubt as to the veracity and robustness of the Plan's delivery and housing strategies.

Havant Borough Council should assess the cumulative impact of development on the road network, and should the proposals in the Havant Local Plan have a significant adverse impact on the road network (strategic road network and the local road network) in Chichester District, then appropriate mitigation should be identified along with the funding to deliver it.

Havant Borough Council should establish the emissions that will result from an increase in traffic as result of the proposals in the plan and assesses the cumulative impact (in conjunction with other plans and proposals in the area) of nitrogen deposition on the statutorily protected habitats as part of the Habitat Regulations Assessment.

The draft Local Plan addresses the need to provide road improvements within the development areas but it fails to look at the impact beyond the Borough's boundary. There appears to be no strategic assessment of the impact of all these developments on the wider area.

Increased requirement for public transport for students and staff from a wide catchment area for Havant and South Downs college must be included in the emerging transport assessment.

It is clear that the council accepts that existing residents will suffer from the significantly increased traffic, but the plan does not offer a clear solution on how to alleviate the situation. Perhaps residents would support the plan more positively if there was a clear commitment on how traffic hazards, congestion and air pollution will be avoided.

In the past, when answers were being sought for the traffic problems to the west of the LTP, the Borough organised a study group - the Broadmarsh Travel to Work Study. Perhaps this approach should be adopted for the LTP Master Planning Team given the affect their work might have on the A3023. The Community as well as business interests should be involved in such a significant development.

Cycling should be a key component of the integrated transport assessment
<b>Transport Strategy - Policy IN2</b>
Highways England is supportive of policies IN1, IN2 and IN3, which align with the principles of NPPF, its soundness requirements, and Circular 02/2013 and will help to mitigate any impacts of Key Sites 1 and 2 on the SRN.
Policy / supporting text should acknowledge cross county boundary impacts
IN2 b is supported
Hampshire County Council as Local Highway Authority, needs to consult with Highway England and West Sussex CC to develop a strategic plan as a matter of urgency for the area
Para 4.22 - the statement on shifting to a 'low carbon economy by encouraging sustainable modes and patterns of travel' is very vague. There should be targets for a modal shift of travel to sustainable and active travel alternatives.
Everyday cycling is an essential part of meeting the Council's sustainability goals. The Council must set the overall vision for an integrated cycling infrastructure across the whole borough, not just in small development pockets.
There should be a policy to make developers connect up their housing estates with dual use paths to at least 3 other compass points, to encourage more active travel.
Para 4.34 - Compliance with 'Manual for Streets or other recognised guidance and standards' should be mandatory, otherwise developers will do as they please to maximise their profits.
Development cannot be expected to solve problems which already exist. However, it is reasonable to expect that development mitigates its own impact on the borough's road network.
As well as the question of additional vehicles there will need to be improved public transport links both North-South and East-West
Planning of cycling and walking infrastructure comes over as being ad-hoc. There is no evidence of a strategic approach as to how walking and cycling might be increased. Havant needs a Local Cycling and Walking Implementation Plan (LCWIP). Not having one would automatically disqualify Havant from many future central funding streams.
In accordance with national policy, Highways England look to HBC to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We would be concerned if any material increase in traffic were to occur on the SRN because of planned growth within the Havant borough, without careful consideration of mitigation measures. It is important that the Local Plan provide the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the A3(M) and the A27.
As neighbouring Highway Authority Portsmouth City Council is keen to work with Havant Borough Council as Local Planning Authority and Hampshire County Council as Highway Authority on any future proposals for Bus Rapid Transit across south east Hampshire and to ensure they are appropriately reflected in emerging Local Plans.
The local plan needs a positive statement in the text about developing public transport through Bus Rapid Transit (BRT). HCC supports the delivery of a BRT network in SE Hampshire with routes to Havant, Waterlooville, QA hospital, Portsmouth and Fareham and the opportunity to serve the proposed strategic housing site at Southleigh (KS5). To support BRT provision in the borough there needs to be a specific policy to replace previous policy AL5 (Cross borough rapid transit) rather than a general reference to bus travel within the Improving Transport Infrastructure policy (IN2).

There are inconsistencies in the way transport matters are addressed. There needs to be some generic policy wording which can be applied to all the site allocations to ensure that they:

- a) have a transport statement/assessment;
- b) promote sustainable travel by all modes and are accessible by pedestrians and cyclists;
- d) mitigate the impacts of additional traffic on the highway network, environment, air quality and amenity;
- e) secure on site and/off-site highway improvements or financial contributions.

### **A27 Junction**

The new A27 Junction that is planned for Southleigh will take some of the commuter traffic created by Southleigh new housing. It is not likely to make any effect on the demands of traffic to Havant or the North.

There can be no development prior to the new junction being funded and agreed

Unforeseen consequences should be considered carefully. For example, the proposed new spine road/A27 junction may well alleviate (for a period) traffic flows in the centre of Havant, but we should not overlook the potential detrimental effects. These could include: A marked increase in through traffic from the A3 via Rowlands Castle to the A259 and the new junction via the B2148 which already has a poor accident record (HBC website); An additional strain on country roads north of the A27 when A27 is closed (and the effect of traffic trying to negotiate Chichester from north to south to regain the A27); The difficulties for local residents to access the spine road once it becomes a major thoroughfare; The use of 'rat runs' through the neighbourhood streets.

Highways England would like to work with the council to assess the deliverability of the Southleigh site and the proposed new access onto A27.

HBC still needs to demonstrate that the junction:

- Is needed
- Can be designed in conformity with the Design Manual for Roads and Bridges
- Is deliverable, i.e. can be funded by the Southleigh development, or other funding mechanisms
- Would not negatively affect flows along the A27 and A3(M)

It should either be acknowledged in the plan that the plan will not be deliverable without this junction, or alternative mitigation for the transport impacts of development should be identified.

New slip road would only increase more traffic on an already congested road

The possible new A27 junction and relative roads may help but even that is probably going to exit in the town in an area of narrow, cluttered roads.

### **Specific Areas**

**(NB for Hayling Island please see the 'Hayling Island (General)' table)**

Concern raised over capacity of the following roads and areas, in light of development proposals:

- Concern over cumulative impact of development along the A259 corridor in Havant and West Sussex
- Access to A27 from Emsworth town centre. This is very narrow and already congested
- Southleigh Road / Warblington level crossing
- Park Road North. This is very congested at the best of times due to the four sets of traffic lights
- Emsworth - North Street - Railway Bridge - Horndean Road
- Hordean Road corridor (B2148/B2149) from Emsworth to Rowlands Castle (and link to Hordean and A3(M); in particular junctions with Southleigh Road, Bartons Road, New Brighton Road, Emsworth Common Road
- A3023 particularly at the Langstone Roundabout on the A27 and the turn into the Langstone Technology Park

Plan must consider how people travel to and from Emsworth Town Centre

Parking in Emsworth, Havant and Waterlooville is not easy and car use is being discouraged. Local parades of shops do not fill all requirements.

Leigh Park is well served by buses and it is easy to get to Emsworth and Waterlooville from the town centre.

The Denvilles/Southleigh/Horndean Road area is lacking public transport and a car is essential if you are older or have mobility problems.

It is requested that HBC works with EHDC and HCC Highways to ensure that suitable improvements are made to the B2148 and B2149 route between Emsworth and Horndean using some of the developers' contributions to ensure the safety of road users and pedestrians alike.

Westbourne is increasingly being used by traffic flowing from Emsworth and the eastern areas of Havant on route to Chichester or Rowlands Castle, the A3M and beyond. The level of traffic generated by the Southleigh proposal will add to this growing volume of traffic passing through the village. Westbourne Parish Council would argue strongly that the findings of the TIA may require mitigation measures to be funded by the strategic development at Southleigh in order to deter and control traffic passing through Westbourne Village.

The road junction into Emsworth station is dangerous and should be reviewed

The use of Emsworth station has dropped from 500,000 to 250,000 journeys per year; this is due to Southern Rail disputes and the Council switching off the lights going north (residents feel unsafe)

### **General comments on transport matters**

Transport is a serious problem in the borough.

Delays damage businesses and therefore the local and national economy.

Cycle routes that are also pedestrian routes are dangerous. They should be separated.

The present roads are in a dreadful condition, residential, and trunk roads - like a third world country now.

With this increased traffic, pollution is another serious problem.

The 21st century population is reliant on its cars, vans and lorries for transport. Therefore the road network is, alas, crucial to a thriving and growing economy.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

The majority of the comments on this policy relate to concerns about highways and transport in the borough, and the impact that additional development will have, as well as the fact that the transport evidence has not been completed.

As was noted in the draft HBLP 2036 in the introduction to Policy IN2, the evidence base to inform the transport package to accompany the Local Plan has not been completed.

The Council will continue to work with Hampshire County Council and Highways England to complete the evidence base. The results of the Borough Wide Transport Assessment (TA) and the Hayling Island Highway and Transport Infrastructure Assessment will be reflected in next draft of the Local Plan. At this stage the 'Improving Transport Infrastructure' policy and the infrastructure Delivery Plan will set out the key schemes identified both through Hampshire County Council Strategic Planning and those identified in the full plan TA as being necessary to mitigate and support the development proposals in the Local Plan.

## IN3 - Transport and Parking in New Development

12 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Support

Support for IN3 - The draft Policy adopts a flexible approach towards transport and parking to respond to the characteristics of the development proposed. The draft policy is consistent with national policy, in particular paragraphs 32 and 35 of the NPPF which seek to ensure significant transport impacts are mitigated and sustainable transport is implemented where possible.

Highways England is supportive of policies IN1, IN2 and IN3, which align with the principles of NPPF, its soundness requirements, and Circular 02/2013 and will help to mitigate any impacts of Key Sites 1 and 2 on the SRN.

#### Evidence Base

Micro simulation should be put out for public scrutiny

Paragraph 4.43 - support the development of a Paramics (or other simulation) model for other key pinch points of road infrastructure in the Borough where traditional traffic analyses are unlikely to capture the full spectrum of effects of new development. Traditional traffic flow modelling does not sufficiently represent the range of congestion effects that occur whereas simulation will be able to better capture the reality of current (and future) delays and congestion.

#### Parking and other standards

Council should aim for higher standards in parking than national standards

Policy IN3 (c) and 4.35 - Draft refers to "Provision for parking in line with Council Standards". What is the government guidance on which the Parking Supplementary Planning Document 2016 is based and is it the latest guidance? HDLP 2036 IN3 must mandate parking provision (as a minimum) in compliance with the latest DoT guidance at the date of adoption of the Plan.

What parking & safety measures have been put in place for additional cars & cycles?

Encourage sufficient parking to be allowed for in the new estates.

For those that have more space, two parking spaces 'side-by-side' is very attractive compared to two 'back-to-back'

People often use their garage for storage instead of parking. They are valued storage spaces.

Do not support provision of car ports instead of garages.

When requiring travel plans and access plans and related documents from developers, there should be a loose standard adopted to direct the types of consideration required. For example, the use of census data is helpful within each ward to consider how much parking may be required against how much change to bus routes requires consideration. Having established the need for adapted housing, this needs to drive the number of enforceable accessible parking spaces.

New estates often forbid parking of trade vehicles, pushing them into adjacent roads. This makes the new estate sound attractive but places an unfair burden on existing communities and must be explicitly prevented. It is suggested that all new developments should be required to provide a minimum level of parking for trade or commercial vehicles within the site. It is proposed that the Parking SPD, as part of the Local Plan 2036, is amended and Policies IN3 and IN4 which cover parking and Management Plans urgently need to reflect the requirement to provide such parking. Element c) of the policy needs to set a clear expectation that new development must not lead to parking for the development over-spilling into adjacent, existing roads.

Allowing houses to be built without adequate parking around the station has meant that local residents use up all the car parking at the station rather than passengers.

Para 4.34 reference to Manual for Streets or other recognises guidance and standards: Change “or” to “and”. Reason developers should not be encouraged to ignore national or local guidance or standards.
‘Shared space’ should be eliminated to safely separate pedestrians from motor vehicles.
Where a higher proportion of elderly or disabled people may live, there should be wider pavements allowing safe shared use.
There must be proper planning for dropped kerbs, correct gradients, maximum levels of crossfall
<b>Encouraging alternative modes</b>
E-bikes should be specifically mentioned, and a positive statement made that all references to cycling automatically include and encourage e-bikes.
Cycle parking facilities and security get very little mention, but they are essential to encouraging modal shift in transport, and are very easy and cheap to provide, if required and planned at the outset. They should apply to all types of development - residential, shopping, leisure facilities and commercial / commuting environments. Secure cycle parking is essential, especially for employees. This should be made mandatory for other employers.
Criterion K: Electric Vehicle charging infrastructure is not justified. Strongly object to this requirement, as no suitable evidence or justification has been produced to support it (need; cost /viability implications)
Support IN3 h (as far as it goes)
Support 4.36, but will require significant improvements in design standards and focusing to meet user needs if cycling is to increase
HCC supports the requirement that all new development should reduce the need to travel through promoting sustainable transport modes and by making the layout of the site accessible by walking, cycling and public transport with connections to existing networks.
This policy needs more supporting text in How the policy Works section especially on sustainable transport modes.
<b>Mitigating Impacts</b>
Paragraph 4.43 - How can the simulation possibly give accurate answers for each developer if the model is unaware of all developer intentions? The likely outcome is that early development will be favoured and late developers will struggle that’s assuming that the model is updated for each development which I doubt.
IN3(a) sets the bar too low to ensure that the negative impacts of new developments on the road infrastructure are prevented. Requiring developers to only show that they can mitigate impacts to below a 'severe' level is unacceptable. At the very least the criteria should be 'moderate' rather than 'severe' impacts. There is also a need to formally define these criteria lest the Council wants to end up arbitrating on the definition of terms.
What constitutes a 'mitigation measure' should be constrained to specific physical changes to the road infrastructure (junctions, traffic lights, etc.). This will help limit artificial claims about the percentage of car owners, journeys and propensity to travel by sustainable modes of transport that developers seem to claim in planning submissions for new developments.
We consider that, as currently worded, the policies in the plan should be capable of providing transport infrastructure improvements in West Sussex to mitigate the transport impacts from proposed development in Havant. (specifically IN3)
Should change ‘severe’ to ‘significant’ impacts on the network in paras 4.40 and 4.42
We welcome point i. of this policy regarding rights of way, but request amendments to text to support enhancements to the network, where appropriate. In addition, HCC request that major developments submit a ‘PROW Assessment’, demonstrating how the development will seek to protect and enhance the local rights of way network, including providing new routes, where appropriate.
<b>HBCs proposed way forward for Regulation 19 HBLP2036</b>

Proceed with policy as proposed in the regulation 18 draft, and consider wording amendments to:

- Consider how the council can limit restrictions on parking (eg of trade vehicles) on new estates imposed by developers in order to prevent effects on nearby roads
- Strengthen the encouragement of and provision for sustainable modes of transport
- Set out more clearly the evidence base to support requirements for electric vehicle charging infrastructure
- Require full mitigation of all expected highway impacts, without unproven reliance on modal shift (while still requiring sustainable transport measures and travel plans to better the situation)
- Require Public Rights of Way assessments for major developments

Comments where no change is considered necessary:

- National planning policy does not require any particular parking standards. These may be set locally. However, this is too detailed a matter for the Local Plan. Therefore, this policy requires compliance with the standards, which are set in Supplementary Planning Documents (currently the SPD adopted in 2016). The Council is currently considering a review of its Parking Standards SPD. If such a review takes place, there will be opportunity for to comment on the standards proposed.
- National Planning guidance is clear that Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

## IN4 - Future Management and Management Plans

4 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Concern regarding the shift in responsibility to private management companies for maintenance of common parts.

Out-sourcing has proved to be a false economy and difficult/expensive to remedy if it fails

Concern that policy E22 refers to 'whole life management and maintenance' with regard to ground water pollution or overflow into controlled water which is lacking in policy IN4

Effective management cannot be provided on a site by site basis:

- There should be a clear masterplan for blue and green infrastructure (including management) against which the council can assess future development plans
- The sensitive ecology of Havant water courses as they impact on the sustainability of Chichester Harbour cannot be presumed adequately managed if dealt with on a site by site basis by differing commercial management companies
- The 'common parts' include systems where there is a need to ensure that cumulative impact is assessed

The management of sustainable drainage systems is a concern

Questions raised with regard to:

- The expertise of developers to deliver effective management
- Is money held back until the Sustainable Urban drainage scheme has proved itself over at least one annual cycle
- How will private management companies work in practice as their performance is dependent on regular monitoring. Will this impact on saleability of houses
- Will questions over drainage and maintenance affect household insurance
- How is regular maintenance of common parts guaranteed

There should be some caveat in the policy to restrict excessive price rises by management companies.

A local residents panel should be set up to assist in monitoring implementation so that ongoing management is based on implementation of details approved through the application process

All the sites in Emsworth have flooding issues and the future management of the sites/management plans are lacking in practical detail.

Covenants placed on new developments (e.g. Manor Farm/Nursery Fields, Denvilles) which state that parking of commercial/camper vans overnight on the estate is prohibited has led to upset as such vehicles have to find alternative parking down adjoining roads. The Council should insist on developers providing separate adequate provision for commercial/camper van parking on all new estates.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to include:

- Amending the wording to reference whole life management and maintenance
- Whether a new policy to provide master planning for blue and green infrastructure is required
- If Sustainable Drainage bonds should be retained until one annual cycle has been completed rather than until completion of the works
- A requirement for on site parking for commercial vans/camper vans or a restriction on covenants that remove the ability for parking of these vehicles within the curtilage of proposed properties

Comments where no change is considered necessary:

Concerns with regard to the current process for management of common parts is noted. This policy seeks to provide greater surety with regard to the management of the common parts of future development.

The maintenance of common parts in new development is now the responsibility of private management companies. This is a result of Councils seeking to provide services in a cost-effective manner.

The elements and maintenance requirements that are the responsibility of private management companies are secured by legal arrangement where necessary. However, the continued maintenance and performance would also be subject to a separate legal agreement that prospective owners would agree to prior to purchase of the property.

During the assessment process for Sustainable Drainage Systems, regard is given to contamination into watercourses. There should be no cumulative impact arising from the management of common parts unless agreed by bodies such as the Environment Agency.

Due to fluctuating operating costs (labour, materials, equipment etc) it is not appropriate to cap price rises that a private management company may impose. However, the policy allows for change in managing agent should the majority of residents feel this is appropriate.

The Council monitors whether and how applicants discharge planning conditions and requirements in legal agreements. This is public information and so any one can access it. However to create a residents panel is not seen as necessary as it would simply replicate this function of the Council.

The management of flood risk in new development is considered within Policy E12. Drainage infrastructure in new developments is considered in Policy E13.

# The Environment

## E1 - Health and Wellbeing

10 responses were received regarding this topic

### Summary of comments raised by residents and other stakeholders

#### General

Policy E1 is welcomed.

There is no mention of leisure facilities which can be important for quality of life and mental wellbeing, particularly for adolescents.

The previous Health Policy (CS1) included 'educational and life chances' for young people which HCC suggest should be mentioned in policy E1.

Point b. mentions 'good urban design' and 'easy access' - the six elements of the TCPA [Healthy Weights Environment resource](#) may be useful guidance for this.

Hollybank Recreation Ground should be included as a strategic open space as it is a popular and well-used community asset and destination facility.

Paragraph 5.8 is confusing. Rewording suggested.

It is not completely correct that 'The local Havant Health Profile 2017 shows that these areas of health are worse than the England average'. Rewording suggested.

Paragraph 5.12 should require developments to be designed to be permeable. Rewording suggested.

Proposed policy is in line with the principles contained within Sport England's 'Active Design' guidance - a cross reference would be useful.

Development in Havant borough should be designed in line with the Active Design principles to secure sustainable design.

Hayling Island Beachlands area is not one of the most deprived areas in Hampshire. This is an outrageous false claim and a statement that the council is using to propose its regeneration.

#### Access to the coast

Point (d) should include an exception saying that access to the coast should not be specifically encouraged where this would increase disturbance to internationally designated Chichester and Langstone Harbours SPA.

Point 12 of policy CS1 which relates to moorings, berths, jetties and slipways in the Harbours or on Hayling waterfront, has been removed. This makes an important point about the moratorium on moorings and berths and the restriction on new jetties or slipways unless they are essential for public use, as reflected in the Conservancy's Planning Principles PP1 'Intertidal Structures' and PP12 'Limits on Marinas and Moorings' - it should be reinstated.

#### Sustainable Transport

Cycle racks/storage facilities need to be provided in all public spaces, to further encourage active travel.

Direct link between heavily congested roads, lack of cycle infrastructure and poor public health due to sedentary lifestyles and environmental pollution. Increased traffic from new housing will further discourage cyclists and result in a decrease in cycling and a failure to encourage more active travel.

Sustainable transport needs to go wherever people go, point (d) should be amended to reflect this.

Point (g) should include 'provide opportunities to learn to cycle in a safe environment'.

#### Open Space

The threshold for requiring open space on new developments should be lower than 50.

Paragraph 5.12 supported.

The quality of open space and environmental quality that encourages and enhances well being includes the historic environment, being both quality and sense of place, sense of community and a destination motivation for recreation walks.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- Leisure facilities should be referenced
- Educational and life chances for young people should be referenced
- A requirement for new developments to be 'permeable' should be included
- The list of strategic open spaces under point (f) is fit for purpose
- There should be a requirement for development to be designed in line with Sport England's Active Design guidance
- Point (d) should include an exception saying that access to the coast should not be specifically encouraged where this would increase disturbance to internationally designated Chichester and Langstone Harbours
- Point 12 of policy CS1 which relates to moorings, berths, jetties and slipways in the Harbours or on Hayling waterfront should be reinstated

Comments where no change is considered necessary:

Cycle racks/storage facilities are dealt with in the Parking SPD

The threshold of 50 dwellings for requiring on site open space is dealt with by Policy

Paragraph 5.7 does not say that Hayling Island Beachlands is one of the most deprived areas in Hampshire. It says Havant is one of the most deprived areas in Hampshire and that Beachlands is an area of focus for the Council.

## E2 - Green Infrastructure

18 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### General

Support for policy, particularly points (b) i. and ii.

Principle of multi-functional green infrastructure and the idea of green infrastructure as a network is supported.

The role of heritage and the historic environment in green infrastructure should be referenced in the policy and paragraph 5.20.

With the increase in development pressure within the Borough, it is very important for the Proposals Map to identify potential areas or zones where GI will play a significant role in preventing the coalescence of settlements, retaining local landscape character, addressing the setting of the AONB, maintaining ecological corridors and networks as well as preventing the fragmentation of habitats and species. Any development within these zones would need to ensure the above measures have been addressed.

The Local Plan is too balanced towards human recreational needs at the expense of biodiversity survival needs.

The current wording of Policies E2, E3, and E4 are unsound as it not effective in being sufficiently flexible to respond to the needs of public service providers and local stakeholder's plans.

Supporting text should acknowledge the role of Section 77 of the School Standards and Framework Act 1998 regarding the development of surplus school playing fields to rationalise land holdings as a means of financing recreational and educational improvements.

There should also be a policy to state that native species of trees and shrubs should be used in landscaping of new green infrastructure and planting carried out to screen development.

Inconsistency between Policy E2 and the supporting text, in relation to green infrastructure and open space. The terms have been used interchangeably. Policy E2 and its supporting text need to clearly differentiate between the more environmentally-focused green infrastructure networks and the more community-focused open space, in order to be consistent with national policy. Such an approach will provide clarity in the interpretation of the policy with respect to the determination of a planning application.

Green spaces are required to form a network if the quality of the environment is to be protected and enhanced.

Definition of green and blue environment is needed.

Blue and Green Infrastructure Masterplans are required.

Policy in conflict with H1 as the magnitude of allocated sites will do nothing towards aim of protecting green infrastructure.

#### Ecology

Recommended that the role of GI to maintain and enhance the biodiversity of the Borough is fully explored and opportunities identified to maximise the benefits of the GI for both people and wildlife.

Policy E2 should be strengthened to ensure biodiversity enhancement is secured and measures to enhance wildlife areas and strengthen ecological corridors are incorporated.

The Council should use ecological network mapping in order to establish where such networks may function best for wildlife.

Sanctuary areas for wildlife should be maintained, such as high tide wader roosts, woodlands and open grassland in order for sensitive species and fragile habitats to co-exist with people.

Recreational disturbance is one of the primary causes of disturbance for wildlife. With an increasing population, people will seek out more tranquil places for recreations, thereby disturbing the more sensitive species and habitats.

### **Open Space Requirement**

Requirement for more green spaces to be provided is supported.

Flexibility should be added into the delivery of new green infrastructure on developments of 50 dwellings or more. The policy should allow for the payment for offsite contributions which could be used to provide an improvement to an existing facility or wider project. The policy as drafted will result in a proliferation of smaller play areas with limited play value.

The council should consider the open space requirement at a lower threshold than 50+ households.

Para 5.26 doesn't make sense - all developments on Hayling have been on greenfield sites and there is no compensating provision for residents.

### **Management of Open Spaces**

Policy does not include proactive improvement measures in the management of green infrastructure.

The policy should emphasise how neglected green areas could be sensitively enhanced to cater for wildlife and recreation.

The policy should also contain provision for management of open spaces, hedgerows etc so that they continue to function ecologically and remain attractive.

### **Sustainable Transport**

Welcome reference to wildlife corridors but cycling corridors not mentioned.

Support for the development of the GI network for the Borough to help ensure there are improved links to less sensitive open space areas by public transport, walking and cycling and look to directing recreational pressure away from more sensitive areas.

The Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 75 of the NPPF.

### **Recreation**

The significant increase in population will clearly result in an increased demand to make use of activities such as sailing, cycling and horse riding. There is no indication on how specifically the demands will be managed.

Regeneration is included in the plan. Some of this should include the swings/slides etc. in Hayling Park as it's looking very sad and neglected.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- Heritage and the historic environment could be referenced
- A requirement should be included for native species of trees and shrubs to be used in landscaping of new green infrastructure and planting carried out to screen development
- The use of the terms 'green infrastructure' and 'open space' need clarification
- Definitions of blue and green environment should be included
- Whether a new policy to provide master planning for blue and green infrastructure is required
- The role of green infrastructure to maintain and enhance the biodiversity of the Borough is fully explored
- The policy could be strengthened to strengthen the requirement for biodiversity enhancement
- The open space requirement is appropriate

- The policy should make reference to maintenance and enhancement of open spaces
- A criterion to protect and enhance public rights of way and National Trails should be added.

Comments where no change considered necessary:

- The impact on landscape and the AONB is covered by policies E10 and E11 whilst the Biodiversity Strategy (update of BAP) will look at ecological corridors and networks. The proposals map illustrates geographically the application of policies in a development plan but it wouldn't be appropriate to go into the level of detail suggested regarding green infrastructure.
- It is recognised that it is important to protect green infrastructure, however, this does not outweigh the housing need. Policy E2 seeks to ensure the protection of existing green infrastructure in combination with housing delivery.
- Ecological mapping will be explored in the Biodiversity Strategy
- Sanctuary areas for wildlife are considered in policy E15
- Strategies to mitigate recreational disturbance are set out in Policy E16
- Paragraph 5.26 talks about the standards for new open space provision on development sites which will help address the loss of greenfield sites
- Criterion (b)ii. seeks to improve linkages in the green infrastructure network wherever possible by improving accessibility by walking and cycling and providing wildlife corridors
- Increased demands on sailing/ cycling/ horse riding are not relevant to this policy
- Developer contributions may be used to improve open spaces including play parks
- The approach to planning obligations will be considered through the Draft Charging Schedule and the Regulation 123 list
- It is not considered that local public service providers should be exempt from the requirements of Policies E2, E3 or E4

## E3 - Sports and Recreation

5 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for policy.

Watersports should be supported in Hayling Island to make it a destination for healthy lifestyles and sport.

Cycling and walking should be explicitly listed as sports and recreations.

5.44 references 'Open Space Sports and Recreation Study' but it is unavailable.

Clarification needed on criterion (c) to ensure it fully complies with Para 74 of NPPF.

Work ongoing on Playing Pitch Strategy (PPS) supported - once complete it should inform development of the Local Plan. PPS should be referenced in policy or footnote.

Recognition of the importance of educational sites in contributing to sports facilities and the associated issues in terms of community access is supported

The Local Plan to acknowledge that commercial sports (not retail) are a legitimate use on Industrial and Business parks creating employment as well as inputting into the local economy

The current wording is unsound as it not effective in being sufficiently flexible to respond to the needs of public service providers and local stakeholders plans.

Supporting text should acknowledge the role of Section 77 of the School Standards and Framework Act 1998 regarding the development of surplus school playing fields to rationalise land holdings as a means of financing recreational and educational improvements.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- Watersports on Hayling Island should be specifically referenced
- Amendments to criterion (c) (loss of sports and recreation facilities) are necessary

Comments where no change is considered necessary:

- Policy E1 seeks to maximise opportunities for walking and cycling
- The Open Space, Sport and Recreation Study is currently underway and will be available for the Regulation 19 consultation.
- The location of commercial sports facilities on industrial and business parks will be considered in the employment policies (see tables on policies C1 and C2).
- It is not considered that local public service providers should be exempt from the requirements of Policies E2, E3 or E4.

## E4 Local Green Spaces

35 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

**Please also see table on 'Is there another site which should be noted as a Local Green Space designation'.**

Support the policy.

There are worryingly few green spaces protected by the policy.

The current wording of Policies E2, E3 and E4 are unsound as in not effective in being sufficiently flexible to respond to the needs of public service providers and local stakeholders' plans. Supporting text addition suggested.

These [Local Green Spaces] do not get enough attention with many areas omitted. More attention should be paid to the protection and regeneration of woodland, meadows and hedgerows. With the increased population envisaged current facilities will be overused, there will be more pollution from increased traffic.

The Council should observe the criteria shown.

We request the following spaces to be added to the list which we intend to include in the Emsworth Neighbourhood Plan: The Emsworth Victoria Cottage Hospital Garden; 3 allotment sites in Emsworth at Warblington Road, Washington Road and Redlands Grange; "Horse Fields" (opposite Brookfield Hotel); 2 Recreation Grounds (Horndean Road & Soughleigh Road); Ems Valley Corridor (East Hampshire Strip/Sussex Border Path field east of Westbourne Avenue).

East Hampshire Strip/Sussex Border Path field east of Westbourne Avenue meets the criteria for a designated green space and we have received numerous representations requesting that it is designated as such. We would therefore like to include this site as a designated green space in the Emsworth Neighbourhood Plan and request that HBC does the same in its Local Plan.

Comments in relation to Westwood Close (Policy H10):

- Multiple requests for policy H10, land at Westwood Close be removed from the Draft Local Plan be added to Policy E4 as a new Local Green Space
- Increasingly important given the scope of development in nearby areas.
- It fully meets the criteria required to be classified as a Local Green Space (E4).
- Should be formally designated as Sussex Border Path Green Space - this would strengthen the vulnerable nature of the gap between Havant and West Sussex
- If the Council determine the application, they will in effect rule out the residents' request to include it in the list of Local Green Spaces - this request was presented in good time through the consultation process of the Draft Local Plan. The application for planning consent ought not to take precedence over the consultation period and subsequent consideration of all requests.
- The Green Corridor should be recognised as a LGS as it fulfils the details of beauty, historic significance, recreation, wildlife and is a recognised right of way through this tract of land.
- One of the few green spaces left between Westbourne and Emsworth and an important green corridor / safe country walk between the two villages.
- The area selected to build new homes is inappropriate and would result in an unnecessary destruction of wildlife habitat. It is a vital habitat for a wide range of birds, small mammals, insects, stream life and plants, and mature trees and hedgerows which provide wildlife with homes.

The green sites to the east and the strip through the centre of the Southleigh Masterplan should be retained - we have been reassured that if they are well used for recreation they will be safe from further development. Even if it is not fully used by people - it provides one of the last remaining wildlife corridors connecting the South Downs to the Harbour AONB/SSSI/SINC.

It is understood that the areas listed in the Draft Local Plan may be extended, but the draft policy written around them appears to be woolly and exposed to potential challenges by developers offering facilities in exchange for more houses.

Existing neglected assets, requiring enhancement to provide improved accessibility, recreation opportunities and effective wildlife corridors.

Addition to the Local Green Spaces designations would boost local appreciation of them as assets in close proximity to the community, and places of beauty, wildlife and tranquillity especially if managed appropriately by residents' Friends of Group. Havant Borough Tree Wardens, in partnership with TCV (The Conservation Volunteers), the Tree Council and Borough arboriculturalists, would be happy to support this sort of community activity:

Gundymoor Wood, St Clares Wood, Stakes Coppice, Hurst Wood, Purbrook Woods and Covert Grove should be designated Local Green Space (LGS) to raise their status in the borough, encourage local custodianship and the formation of Friends of Groups to manage and care for these woodland fragments.

Sites required to preserve existing recreational and amenity demand, or to ensure either future provision for increased population or to reduce impact on coastal routes or to ensure recreation where people live:

Old Victoria Cottage Hospital Garden, Emworth; Southleigh Recreation Ground; Eastern edge from north to south of Southleigh Strategic site; Sussex Border Path/East Hampshire Gap, grazing land east of Westbourne Avenue/Westwood Close; Allotments at Warblington Road, Emworth; Allotments at Washington Road, Emworth; Allotments at Redlands Grange; Fields south of Havant Road (opposite Brooklands Hotel) known as Horse Field H22A); Fields along the Solent Way between Emworth and Warblington (H23F and H23E); Land around Warblington Church and Farm (H23 C & D).

Those sites which are designated currently (as LGS) should remain so

#### **HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft, with wording amendments.

Whilst the identification of sites as a local green space would be likely to give them a greater profile and raise the community's awareness of them, paragraph 77 of the NPPF is clear that the designation should only be used "*where the green area is demonstrably special to a local community and holds a particular local significance.*" The Council will consider the suggested sites and whether they should be designated as Local Green Spaces as defined by Policy E4 of the Regulation 19 HBLP 2036.

Comments where no changes are considered necessary:

Many respondents raised concern that green spaces were not protected by the policy - however, green and other open spaces would already be protected by Policy E2 (Green Infrastructure), which makes clear that development proposals that would result in a loss of open space as defined on the Proposals Map, will normally be refused. It identifies the exceptional circumstances in the loss of open space may be permitted. A number of respondents have raised concern in relation to the loss of the open space from the new development at Southleigh (see table KS5 - Southleigh).

It is not considered that local public service providers should be exempt from the requirements of Policies E2, E3 or E4.

The NPPF also allows local authorities to designate green space for special protection as Local Green Space. It would afford additional protection by ruling out new development other than in very special circumstances (emphasis added). However, paragraphs 76 and 77 of the NPPF are also clear this designation should not be applied to most green areas or open space - hence the identified list of sites set out in the policy.

The forthcoming Havant Biodiversity Strategy will consider the importance of wider ecological corridors for woodland and wetland habitats informed by the ecological network mapping work undertaken by the Local Nature Partnership.

Various sites are proposed for inclusion in the Emsworth Neighbourhood Plan. Whilst the suggested sites will be considered further through the HBLP 2036, national guidance enables local communities to designate Local Green Spaces through neighbourhood plans so long as they are in broad conformity with the local plan.

Several respondents have also requested the removal of land at Westwood Close (H10) as a housing allocation, and its designation as a Local Green Space in line with E4. Notwithstanding the high housing need in the borough, the principle of development on this site is being further considered (please see the response table for Policy H10).

## E5 - Hermitage Stream

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for this policy.

Point (d) which proposes additional links to the local rights of way network is supported.

Concern that the construction of the Havant Thicket Reservoir pipeline will impact on the Hermitage Stream cycle path.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with potential wording amendments. Consider whether the policy should refer to the pipeline route and associated works.

## E6 - High Quality Design

13 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for the policy.

Policy E6 (or other Policy if more suitable) must require developers to demonstrate the compliance of their designs with latest central or local government guidance on building safety in force when HBLP 2036 is adopted.

Although some flexibility built into each criterion, it is suggested the policy includes a clearer statement requiring consideration of how the criteria should be applied to each application on a case-by-case basis.

Green areas are welcome. However, there should be consideration of design to discourage anti-social behaviour in these spaces.

Criterion C vi draws reference to loss of outlook. Outlook is not a material condition and it would be unlawful for the Council to suggest that this were a material consideration in the determination of applications.

Cycle parking should be required to be covered within para d. (x).

Potential adverse impacts on the South Downs Nation Park should be referenced and considered further. Whilst Havant borough does not directly adjoin the SDNP, there can be knock-on impacts further afield from development within the borough. All local authorities bear a statutory duty to "have regard" to the purposes of National Parks when making decisions that will affect their setting.

The Emsworth Design Statement (2008), which was approved by HBC, should be taken into account, particularly section 3.

It is also important to follow through with a properly integrated road and pavement design, eliminating 'shared space' to safely separate pedestrians from motor vehicles, and where a higher proportion of elderly or disabled people may live, there should wider pavements, allowing shared use for cyclists, motorised scooter and pedestrian usage, clearly signposting speed limits for mobility scooter users (4mph) along with advisory limits for cyclists. There must be proper planning for dropped kerbs, correct gradients, maximum levels of crossfall (eg gradient for slope from house boundary to roadway).

A mix of housing design (external) should be encouraged in developments.

We would advise that all development, not just the non-householder development, should integrate with existing local landscape features and characteristics of the area protecting and enhancing local wildlife, biodiversity and ecology

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- To require long term cycle stores to be covered
- There is a need for greater flexibility for case-by-case considerations
- Reference to consideration of the impact on the setting of the SDNP should be made
- A greater requirement for integrated road and footway design is necessary as part of point c. (v).
- The point at d. (iii) regarding crime and anti-social behaviour should be replicated in the residential part of the policy
- The point at d. (v) regarding landscape features and ecology should be replicated in the residential section of the policy
- The policy should require a suitable mix of design types in new development

Comments where no changes are considered necessary:

- Building safety (construction) is generally considered within the Building Regulations and not through the planning system.
- The policy already requires local design statements to be considered at paragraph E6(b)
- Loss of outlook/overshadowing is a material planning consideration where it is to the detriment of residential amenity (though not loss of view as such)

## E7 - High Quality New Homes

7 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for policy relating to adaptable dwellings.

Residential garden size should be given greater consideration. Particularly social units which tend to primarily house families with children.

No evidence has been presented to demonstrate that space standards are a necessity in Havant. This is required by the Planning Practice Guidance.

Requiring space standards has not been assessed with regard to viability. Additionally, there may be a knock on impact related to the affordability of housing.

A transition period may be required so that developers can factor the increased cost into future land acquisitions.

Question raised with regard to how the accessibility standards will be enforced.

The Council should be working with existing providers, local groups and Adult Services' Departments within the County Council to identify the level of need in both the social and private housing sectors, and such figures should then be used to determine the degree of housing which should be built to a standard much closer to the point of adaptation.

30% adaptable dwellings is too low. This should be increased to 80% in line with Eastleigh Borough Council

Optional water standards should be adopted as Portsmouth Water will now be distributing water supply to a greater extent. This will create possible water supply stress in the borough.

The Council would only have knowledge of a disabled person if they were on the Council Housing list. This would not account for disabled people who were looking to buy private housing.

No consideration has been made to topography and developers may design a development to make it 'appear' to be inaccessible and therefore argue that the requirement for adaptable properties is not needed.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- A requirement for residential garden sizes should be provided within the policy
- The percentage of M4(2) dwellings required should increase
- The optional water standard should be included

Comments where no changes considered necessary:

The Council's 'Specialist Housing Analysis' sets out that space standards are necessary in Havant to help address the effect smaller homes can have on the physical and mental health of occupants.

The space standards have been assessed as part of the whole plan viability assessment. It is considered that no transition period is necessary as the viability assessment is based on current land values. Its inclusion in the Draft Local Plan gives landowners and housebuilders sufficient notice to prepare.

The policy proposes that accessibility and adaptability standards will usually be secured via a pre-commencement condition when granting planning permission. Should the dwellings not be provided in line with a planning condition, enforcement action may be taken to require the developer to make the necessary alterations.

The Council works with many statutory and non-statutory bodies including Hampshire County Council Adult Services, Occupational Health and social housing providers. The information provided by bodies such as

these, along with the whole plan viability assessment, have helped inform the proposed requirements. This information has included non-personal data with regard to the projected need for adaptable and adapted dwellings in both the affordable and private market.

## E8 – Low Carbon Design

12 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The policy and its purpose of low carbon, well-designed, good quality and energy efficient homes is supported/endorsed.

Paragraph 5.86 is supported.

It is encouraged that the optional water efficiency requirement of 110 litres per person per day is adopted; as one fifth of household energy is used to heat water, increased water efficiency will reduce carbon emissions.

Some water companies have worked with Councils to offer discount on connection fees for developers who go further than the 110 litre requirements (e.g. installing smaller baths, additional water saving devices etc.)

To provide essential services and adapt to change in the regulatory process, flexibility is requested for public bodies.

Criteria a) to e) – Broadly supported in principle.

Criterion d) – Amend to “*where possible, the development is intended to provide low or zero carbon energy*”.

Criterion f):

- Amend to include “*or equivalent*” after BREEAM reference
- Add “*for some development proposals, it is recognised that it will not always be appropriate to seek to meet these standards and in such circumstances, it will not be necessary to provide financial or technical advice*”

Objection to the policy.

New building methods are more expensive; new housing must be both affordable to residents and attractive to developers.

It is more difficult for proposals which seek to extend existing floorspace to achieve such criteria.

The policy should not be unnecessarily restrictive; otherwise it may undermine the overarching strategic priorities of the plan being met.

The policy should be aspirational rather than a requirement; change to read “*proposals for residential development will be encouraged to achieve....*”.

The policy has not been subject to the required viability testing (Paragraph 173 of the NPPF).

Paragraph 2.2.4 of the Local Plan and CIL Viability Study (November 2017) states that no sensitivity testing was carried out regarding Code for Sustainable Homes (CfSH) or zero carbon.

Paragraph 95 of the NPPF supports energy efficiency improvements but does not categorically require them.

Criterion g):

- Should be deleted
- The Ministerial Statement allowed local planning authorities to set policies at Code 4 of the CfSH until the Deregulation Act had been introduced
- Section 43 of the Deregulation Act 2015 removes Part (1)(c) of the Planning and Energy Act 2008 which allowed local authorities to set energy efficient standards that exceed building regulations
- Applicants are only required to meet Part L of the Building Regulations; requirement above this is in direct conflict with national policy and standards
- Could be reworded to give greater weight to proposals which exceed building regulations
- Should be revised to allow flexibility regarding viability; this would be consistent with criterion f)

Home Quality Mark (HQM) may go some of the way towards replacing the withdrawn Code for Sustainable Homes. However; take up by companies, nationally, is mostly among SMEs rather than large corporate building companies.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to include:

- Further clarity in the supporting text about how applicants will be expected to meet enhanced energy efficiency standards
- An acknowledgment in the supporting text that other third-party assessments are available and that the use of these will need to be discussed with the Council through pre-application meetings
- That the Council will give greater weight to proposals which exceed criterion g)
- Flexibility regarding viability within criterion g) to be consistent with criterion f)

The optional water efficiency requirement of 110 litres per person per day has been considered under Policy E7 (High Quality New Homes).

Comments were no change is considered necessary:

- All applicants will need to show compliance with the policy regardless of whether or not they are a public body
- The Council considers that there is already sufficient flexibility regarding criterion f); we disagree with the suggested wording amendment that some development proposals should not have to provide financial or technical advice, as this would undermine the policy completely
- Criterion g) can be met without using new building methods
- Section 43 of the Deregulation Act has not yet been enacted. In addition, local plans have been adopted since 2015 which include higher efficiency standards above building regulations on the basis that they are viable
- The Local Plan and CIL Viability Study – Draft Report (November 2017):
  - Enhanced energy efficiency standards (the equivalent of Code 4) were considered viable in the study, please see paragraphs 2.2.2 and 2.2.3 (page 24)
  - Paragraph 2.2.4 stated that no sensitivity testing was carried out in relation to higher efficiency standards (i.e. above Code 4); however, as set out in the summary table for the Local Plan and CIL Viability Study, this will now be considered

## E9 - Historic Environment and Heritage Assets

5 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for policy.

Support the section on Historic Environment and Heritage Assets, particularly Policy E9. We consider that this satisfies the requirement of paragraph 157 of the National Planning Policy Framework for local plans to *include strategic policies to deliver the conservation and enhancement of the historic environment*.

Consider it important for local plans to include a more detailed policy or policies for the different types of heritage assets setting out the characteristics of each type of assets that the Council will expect development proposals to conserve and enhance, in order to provide an indication of how a decision maker should react to a development proposal as required by paragraph 154 of the NPPF.

Consider that a development management policy (or policies) is necessary as part of the positive strategy for the conservation and enjoyment of, and the clear strategy for enhancing, the historic environment required by the NPPF. This should include criteria for assessing the potential impact of development proposals on the significance of all relevant heritage assets.

Note that paragraph 5.105 states that "*The Council has a positive strategy for conservation and enjoyment of the historic environment*". However, other than indicating that it will "appropriately manage development and determine planning applications.....", the Council does not explain what its positive strategy actually is.

We look to local plans to contain commitments to positive measures for the historic environment e.g. a programme of completing and reviewing conservation area appraisals, the implementation of Article 4 Directions where the special interest of a conservation area is being lost through permitted development, the completion of a list of locally important heritage assets or a survey of grade II buildings at risk. We see no indication of the Council proposing or committing to undertaking any of these proactive measures.

Whilst we acknowledge and welcome clause (b) of Policy E9, we consider that the Plan should specifically address the issue of heritage assets at risk as required by the National Planning Policy Framework.

Paragraph 5.107 of the Draft Local Plan states "The council has a positive strategy for the conservation and enjoyment of the historic environment in line with NPPF". This sentiment must be measured against the content of the document.

Concern that paragraph 5.103 is not strong enough to preserve heritage in the Borough.

Concern about previous demolitions that have occurred and heritage assets in disrepair (see photos on original rep). Havant Borough Council should make use of its enforcement powers and something to the effect should be included in the draft Plan to prevent this from happening.

Concern that the requirement to protect, conserve and enhance the historic environment is too vague and therefore ineffective. To be consistent with national policy the wording should be aimed directly at heritage assets rather than the more broad historic environment.

Criterion (a) of policy E9 goes unjustifiably beyond NPPF in stating "Protect, conserve and enhance", without specifying the significance of the heritage asset, so is not consistent with national policy.

The policy should also include the phrase 'where appropriate' in criterion (a). Rewording suggested.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- The plan should include a more detailed policy approach for the different types of heritage assets
- A clearer strategy for the historic environment should be explored
- The plan should include commitments to positive measures for the historic environment
- The plan should address the issue of heritage assets at risk

Comments where no changes considered necessary:

This is a criteria based policy which assesses the impact of development on heritage assets. The Council considers that it is generally compliant with the NPPF

The policy sets out the council's approach to the historic environment.

The preservation of the Borough's heritage assets is not solely reliant on Paragraph 5.103, it is for the policy as a whole to do that.

The HBLP 2036 is unable to address previous developments and demolitions.

Paragraph 126 of the NPPF requires local planning authorities to have a positive strategy for the conservation and enjoyment of the historic environment as a whole. Therefore, references to the protection, conservation and enhancement of the historic environment are considered appropriate. The policy also addresses heritage assets.

Paragraph 126 of the NPPF states that heritage assets should be conserved in a manner appropriate to their significance. This infers that all heritage assets should be protected to a certain degree. Therefore, it is not considered that criterion (a) goes beyond this as it does not specify the extent to which any heritage asset should be protected, conserved or enhanced.

The NPPF recognises that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Therefore, it is considered that conservation of all historic assets should be explored. It would undermine the policy to include the phrase 'where appropriate' in criterion (a).

## E10 - Landscape and Townscape

9 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The PUSH Spatial Position Statement June 2016 supports strategic countryside gaps. Figure 18 shows the Draft HBLP2036 fails to identify a single gap between settlements

The infilling of the gap between Havant and Emsworth would be regrettable as it would be harmful to the identity of those settlements and the rural setting of the AONB;

Settlement boundary around Northney Marina is not logical, as it is isolated from other settlement areas

Principles of CS2 and AL17 of the current Local Plan, (prioritising development on previously developed land and protecting the undeveloped gaps between settlements) should be reinstated

Havant Borough is already one of the most built on in the UK. 5.112 sounds extremely hollow in this context. HBC should do more to resist small windfall sites, which do enormous damage to the local sense of place and distinctiveness, reduce recreational opportunities and sense of wellbeing, and put further pressure on our environmentally challenged water courses and further diminish our "rich and diverse natural environment" (HBC Draft Local Plan 5.171) and biodiversity.

Object to the use of settlement boundaries to arbitrarily restrict suitable development from coming forward on the edge of settlements. This does not accord with the positive approach to growth required by the NPPF. Suggest a much more flexible approach towards development adjacent to settlement boundaries.

E10 b - In addition to these criteria, there may be locational reasons for a development to be outside defined settlement boundaries, such as an extension to an existing operation that already exists outside the settlement boundary. Suggest additional criterion

Recreational access to undeveloped areas and the coast should not increase disturbance to the SPA; Criteria (a)(v) and (c)(ii)

Support for this policy / presumption against new development outside settlement boundaries is strongly supported.

Proposals for the use of settlement boundaries (criterion b) would have greater prominence in a separate or clearly headed Policy

Policy text should make it clear the lists comprise 'or' criteria and that development proposals do not have to comply with all of them to satisfy the policy overall.

Historic England welcome and support policy, although consider that it is rather light on townscape considerations. This would be an opportunity to refer again to Conservation Area Character Appraisals and Management Plans, as in the supporting text of paragraph 5.117, which we welcome and support.

The landscape has an historic content that contributes to character and local distinctiveness which could be overtly acknowledged in para 5.115.

HCC support point a.v. of this policy.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments.

In addition, consider how the policy may be amended to

- Protect designated nature conservation sites more clearly from recreational disturbance (criteria (a)(v) and (c)(ii)), although it should be noted that draft policies E15-E18 contain considerable protection
- Add 'and' or 'or' to criteria lists, to clarify whether all or individual criteria apply
- Highlight 'settlement boundaries' in the policy title
- Include additional references and provisions in relation to historic features in the landscape
- Include additional references and provisions regarding townscape

Comments where no change is considered necessary:

The PUSH Spatial Position Statement supports strategic countryside gaps, but it is not considered that any gaps of 'sub-regional significance', nor of 'fundamental local importance' exist in the Borough, which by themselves would outweigh the need for housing.

It is acknowledged that undeveloped gaps were protected by policies in the adopted Local Plan. However, in the new HBLP2036 it is no longer possible to continue this protection, as there are not enough brownfield sites and sites within the existing urban area to meet the Borough's housing need. Therefore, greenfield sites outside of the existing urban area have had to be considered for development. Figure 18 draws the settlement boundaries around existing developed areas, and the proposed allocations in the draft HBLP2036, and E10 seeks to manage development outside of these areas (windfall sites).

The settlement boundaries on figure 18 are defined by the existing built-up areas together with the allocations in this plan. As Northney Marina is an allocation in this plan (H30), it would be inconsistent to exclude it from the settlement boundaries.

Disagree that E10 is too restrictive. The plan takes a positive approach to development, and it is not unreasonable to set criteria that development should comply with if it is outside of the areas identified for development. It is not considered that proposals on the edge of settlements or extensions to existing operations should be excepted from meeting these criteria.

It is not considered necessary to split out settlement boundaries into a separate policy, as there is a clear link to landscape and townscape quality.

## E11 - Chichester Harbour AONB

4 responses were received regarding this topic

### Summary of key issues raised by residents and other stakeholders

Not all relevant paragraphs of the NPPF have been referenced in the supporting text.

Plan fails to reference important documents with an influence on the AONB (eg SPD; Landscape Assessment)

Support for this robust policy / support stand-alone policy.

It is very important that landscape issues are appropriately considered with regard to the setting of the AONB and locally valued landscapes through the use of high quality design and green infrastructure.

Policy should cover development affecting the AONB, as well as development within the AONB.

Plan of AONB (Figure 19) is difficult to read.

HBC should consider whether there are areas of tranquillity within the AONB and wider Borough. If so, these should be identified and provided appropriate policy protection.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy, largely as proposed in the regulation 18 draft, with amendments, such as improved mapping and referencing of relevant 'where else to look' documents.

In addition, consider how the policy may be amended to include:

- Its application to developments that affect the setting of the AONB, as well as developments within it.
- Identification of areas of tranquillity.

## E12 - Managing Flood Risk in New Development

5 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Residents are concerned about flooding, because of springs, the high water table and level of proposed development.

Support in principle the importance of reducing the risks of flooding to protect people and property.

Support statement (5.137) which encourages developers to consider ways in which their development can reduce flood risk overall.

Supporting text (5.149) should be more flexible - while it should acknowledge that Flood Zone 1 is preferred, policy should not resist development in Flood Zones 2 and 3 in principle.

Together with E20 'Amenity and Pollution', this policy should be part of co-ordinated Blue Infrastructure Master Plan.

It is not clear how sites will be made to deal with issue of flooding and future maintenance of any mitigation measures.

Past developments and current proposals do not inspire confidence that flood risk will be addressed effectively.

SuDS should also be reflected in this policy as well as in E13.

The Environment Agency (EA) supports the inclusion of this policy and sees it as essential given the flood risk in the borough from a variety of sources.

In relation to the requirement in 5.135 to provide a Flood Risk Statement, the criteria under which a Statement is required should be clearer.

In paragraph 5.139 it states that the sites allocated for development in this plan have gone through the sequential test as part of the plan's sustainability appraisal. The EA is not satisfied that the evidence used to make these judgements is comprehensive enough. We therefore do not consider that the flood risk sequential test has been adequately demonstrated at this time.

The Local Lead Flood Authority (Hampshire County Council) suggests that Policy E12 criteria b. be amended by omitting 'from rivers or the sea' as this excludes other sources of flooding such as surface water. In respect to this point paragraph 5.133 currently states 'As well as tidal flooding from the borough's 48km of coastline, there are areas that are subject to flooding from streams, surface water run-off and rising ground water.'

There is little in the plan or the evidence base regarding a plan for flood protection for Hayling.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments.

In addition, consider how the evidence base can be improved to satisfy the flood risk sequential test for the site allocations in the plan.

Comments where no change is considered necessary:

- Various pieces of evidence and policies in the Local Plan deal with elements of blue infrastructure. However, the Council considers that an entire blue infrastructure master plan is outside the scope of a local plan.
- Paragraph 5.135 already sets out the circumstances under which a Flood Risk Statement would be required
- The approach to development in Flood Zones 2 and 3 is based on national planning guidance
- It is acknowledged that there is some overlap between the matters dealt with in policies E12 (Flood Risk) and E13 (drainage) it is not necessary to repeat provisions, as the plan must be read as a whole
- Future management and maintenance is dealt with in Policy IN4

- The reference to rivers and the sea in criterion b is accurate, as it refers to what is shown on the Environment Agency's flood zone mapping
- Coastal defences are covered by the Infrastructure Delivery Plan and are supported through policy E14 'Areas of Coastal Change'

## E13 - Drainage Infrastructure in New Development

4 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

It is not acceptable that residents' associations and/or individual householders should become responsible for the management of SuDS, green space, land set aside for biodiversity mitigation and a range of other infrastructure features with little knowledge of how these features should be maintained.

Policy should encourage developers to work with Southern Water to extend sewerage provision to any nearby properties presently on private sewerage systems.

How will ongoing compliance to ensure ongoing maintenance and servicing of flood defences put in place be checked?

Southern Water support the principle aim of this policy, which is to reduce flood risk, as well as the detailed requirement for developers to connect to the nearest point of adequate capacity and take account of any existing underground infrastructure that may be present within the site.

Portsmouth Water welcomes this policy, and in particular paragraph 5.144.

Para 5.148 should be amended to include additional reference to Groundwater Source Protection Zones (SPZs).

The Environment Agency notes the intention to replace Policy CS15 and DM25. Currently, the wording of CS15 (policy and supporting text) appears to be inconsistent - is the minimum requirement of the policy that there is no net increase in surface water (as in para 5.142), or is it that there is a reduction in rates/volumes unless it can be proven that this is not possible (as in para 5.143 in line with DM25, and for which there is a justification and need in certain areas due to the pressure on the existing drainage infrastructure). We would suggest that the first bullet in the policy should be amended to become more aspirational and look to reduce runoff below pre-development rates with some justification required where this is not possible. There are areas of the borough, such as Emsworth, where a reduction is really important.

Policy E13 will replace Policy CS15 in the Havant core Strategy. CS15 included the statement that 'Priority should be given to incorporating Sustainable Drainage Systems (SuDS) to manage surface water drainage, unless it is proven that SuDS are not appropriate.' This is consistent with the approach in the NPPF. However, this is no longer the case with the draft Policy E13, as all references to SuDS are now contained in the supporting text that explains how the policy works (paras 5.147 and 5.148). Hampshire County Council suggests that the old wording is retained in the actual policy wording of Policy E13.

Page 74 bullet point f: it is essential that SuDS systems are adequately maintained, so it is good that maintenance is part of the policy.

Surface water management and the provision of sustainable drainage systems are frequently contentious matters especially in areas of fluvial flooding. The successful installation of SuDS is dependent on contractor's competence.

Policy should be clearer that SuDS may not be appropriate in Groundwater Source Protection Zones (SPZs), and that risk assessments should be required.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, and consider wording amendments to:

- remove any inconsistencies between the policy and the supporting text
- consider which elements best sit in the policy itself or in the supporting text.

Comments where no change is considered necessary:

- Developers cannot be compelled to rectify pre-existing problems
- Ongoing compliance and maintenance can be covered in legal agreements (see also policy IN4).
- Paragraph 5.148 already extensively qualifies that SuDS are not appropriate everywhere.

## E14 - Areas of Coastal Change

2 responses were received regarding this topic

### Summary of key issues raised by residents and other stakeholders

This policy and plan for Beachlands under KS4 is contradictory

Policy should also promote that coastal areas identified as not being suitable for development should be used in flood risk management schemes which work with natural processes

Support North Solent Shoreline Management Plan to provide flood protection in the Langstone area and thereby protect the A3023 Langstone road and road bridge to Hayling island.

HCC support point b.1.e) of this policy.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft. However, also

- Review boundaries to remove any overlap between Coastal Change Management Areas in E14 and site boundaries in KS4, to remove apparent contradiction
- Consider whether policy should be amended to make reference to flood risk management schemes which work with natural processes

## E15 - Ecological Conservation

17 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The policy is welcomed/supported.

The policy is endorsed as it is a positive approach to considering development proposals close to or within areas of ecological value and supports the use of mitigation where necessary.

The policy is compliant with Paragraph 113 of the NPPF; local authorities are required to weigh decisions on ecological sites against their importance and contribution to the wider ecological network.

The presumption against development involving the loss of biodiversity/natural features is agreed.

The Lawton Report (2010) highlighted the need for a step-change in the approach to wildlife conservation; the Council should embrace the natural environment by outlining the protection and enhancement of biodiversity within the Borough as a key asset which underpins the local plan.

National Planning Policy requires proposals to deliver no net loss in biodiversity; the Council should look to deliver net biodiversity gains as a minimum.

The Government's 25 Year Environmental Plan sets out a commitment to halt current biodiversity decline and ensure existing requirements for net gain for biodiversity are strengthened in national planning policy.

The definition of conserving biodiversity includes '*in relation to a living organism or type of habitat, restoring or enhancing a population or habitat*' - in other words, delivering net gains.

Recent studies show that much of the wildlife outside of protected areas is declining.

Development is reducing the amount of green open space available for residents and wildlife; it is hard to imagine where mitigation could be provided. It appears to be an empty promise swept under the carpet.

It is recommended that the policy includes the protection of irreplaceable habitats, such as ancient woodland and aged/veteran trees. Standing advice from Natural England and the Forestry Commission has been produced.

There should be a policy to protect as many existing natural features, i.e. trees and hedgerows, as possible.

It would be welcomed if the Council provided a greater willingness to avoid impacts in biodiversity, such as;

- The routine use of pre-emptive TPOs on likely development sites
- The use of hedgerow regulations for protection purposes
- Measures to prevent the increasing fragmentation of habitats in the Borough

The Borough lost more trees than it planted in 2015/16.

The following are required to ensure an effective collaboration between the Council and local conservation groups; the Havant Borough Tree Wardens (HBTW) are willing to provide support to facilitate the production of these:

- **Tree Strategy** - an effective strategy must be put in place that maximises the benefits trees and woods can deliver to local communities
- **Havant Borough Biodiversity Action Plan** - an update is long overdue.

Table 5 - The specific international and national conservation designations in the Borough should be listed.

Paragraph 5.173 - Add "*water resources provided by the Borough's groundwater reserves, springs and rivers, necessary to provide a water supply to the area's homes and businesses*".

Criterion b):

- Reference to net gain in biodiversity is supported
- Amend to '*the development results in a net gain in biodiversity*'
- Biodiversity is not a tangible/measurable entity, replace with '*improvements to wildlife habitat*'

Criterion c):

- Pleased to see the inclusion of this criterion

- As adopted policy DM8 has been lost, the wording should be strengthened to “*and new wildlife corridors implemented around development, which should incorporate existing trees and natural features into the overall design*”

Criterion d):

- Most trees are not the subject of a TPO so are vulnerable to loss
- “*Replacement tree of at least equal value*” is hard to measure so should be replaced with “*replacement tree of a native species and of suitable maturity*”.

Criterion j):

- Should be deleted; development cannot outweigh the value of SINC and LNRs
- Add that “*the site incorporates native species planting in a submitted landscaping scheme*”
- In line with paragraph 5.174, amend to “*where the benefit of the development can be shown to clearly outweigh the substantive nature conservation value of the site and the impact cannot be avoided or mitigated, compensation will be provided*”.

A criterion should be added relating to the protection of the water environment (wording submitted).

Suggestion that the policy and supporting text includes a requirement for all planning applications to be accompanied by a Biodiversity Mitigation and Enhancement Plan (BMEP) that has been approved by a Hampshire County Council (HCC) Ecologist.

A metric to evaluate the loss and gain of biodiversity through development to assess avoidance, mitigation and, where necessary, compensation measures (which is already used by many local authorities) would also ensure the Council delivers its obligations under the NERC Act.

The field west of Southmoor (which should be designated as a LNR if applicable), Southmere Field, Langstone Meadows (already designated local green space) and fields south of Wade Court/Lane form a linked network/wildlife corridor that should be preserved.

A key mechanism should be to establish the creation and maintenance of functioning ecological networks.

Suggestions made for TPOs of specific individual trees.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to:

- Further emphasise the protection and enhancement of biodiversity as a key priority of the local plan
- Include a specific list of international and national conservation designations in the Borough in conjunction with Table 5, although this could be better placed in the forthcoming Havant Biodiversity Strategy
- Include a requirement to protect ancient woodland and aged/veteran trees as set out in the standing advice published by Natural England and the Forestry Commission, either as a criterion in this policy or in a stand-alone policy
- Include a requirement regarding the protection of the water environment, either as a criterion in this policy or in a stand-alone policy
- Include a requirement for BMEPs
- Include and map ecological corridors, where appropriate, once the Havant Borough Biodiversity Strategy is completed and its findings are available

In addition to the above, further investigation and discussion with Natural England is required to ascertain whether and how a biodiversity metric could be used.

As stated in the summary table for Policy E16 (Solent Special Protection Areas), Policy E15 will also need to consider the adverse effects of development, in terms of water quality, light intrusion and noise, on the integrity of European sites.

Comments where no change is considered necessary:

**1) Havant Borough Biodiversity Strategy:**

The update to the Havant Borough Biodiversity Action Plan (BAP) is underway and its working title is the Havant Borough Biodiversity Strategy. The emerging strategy will incorporate the updated Solent Waders and Brent Goose Strategy, the ecological mapping work of the Local Nature Partnership (LNP), an audit of all the local conservation designations in the Borough along with the recommendations of the Government's 25 Year Environmental Plan. It is anticipated that the strategy will then be able to identify key ecological/wildlife corridors and recommend strategies to achieve net biodiversity gain at both the Borough and micro-level. The findings of the strategy will be used to inform the Pre-submission Local Plan 2036.

The benefits that trees and woodlands provide to local communities and ecological networks will be considered through the Biodiversity Strategy.

**2) General:**

- The Council surveyed the trees within most of the proposed development sites and made TPOs (where appropriate) prior to the sites' potential consideration in the plan was made public.
- The fragmentation of habitats is addressed in the policy (see criterion c)

## E16 - Solent Special Protection Areas

9 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The policy is supported.

The Partnership for Urban South Hampshire (PUSH) Joint Committee endorsed the Solent Recreation Mitigation Strategy in December 2017; each authority must now approve the strategy by 1<sup>st</sup> April 2018.

Paragraph 5.192:

- The text should state that the SPA of relevance is the Chichester and Langstone Harbours SPA
- The SPA is also designated in recognition of its breeding terns (Little, Common and Sandwich)
- Although the predominant interest is during the winter and migration periods, the summer is also relevant
- It is stated that Figure 23 illustrates the SPAs; however, it shows the 5.6km zone of influence.

Paragraph 5.193 - This does not appropriately reflect the legislation and should be amended to read: "*The Habitats Regulations [Footnote 46] set out the sequence of steps to be taken by the competent authority when considering authorisation for a plan/project that may have an impact on a European site and its species before deciding to authorise that project. Avoidance and mitigation measures can be considered by the Council (as the competent Authority under the regulations). The competent authority shall agree to the project only after having ascertained that it will not adversely affect the integrity of the SPA and its species*".

Paragraph 5.194 - Amend to "*an acknowledged issue for any new residential development....*"

Paragraph 5.197:

- Amend reference to the interim strategy for accuracy (amended working submitted).
- It is premature to state that the strategy has been successful, suggested amendment to paragraph submitted.

Paragraph 5.198 - The aim should be to maintain access but not increase it.

Paragraph 5.199 - While it may be preferable to be straightforward or cost-effective, this reference is misleading and should be removed.

Footnote 46 - This should be referenced as the Conservation of Habitats and Species Regulations 2017.

Criterion a) - Amend to specify that the financial contribution is in line with the Solent Recreation Mitigation Strategy

Criterion b) - Amend to read "*.... development supported by evidence that it will avoid or mitigate any likely significant effect on the SPAs*".

In the final paragraph of the Policy Box add "*either alone or in combination with other plans or projects*".

Request that all allocation policies within the 5.6km zone of influence state that "*mitigation for recreational disturbance is provided in line with policies E16 and E17*".

Sites which are in close proximity may need to provide mitigation measures in addition to making a financial contribution; this should be reflected in the policy and supporting text, as well as individual site allocations.

Alongside Natural England, both the Langstone Harbour Board and the Chichester Harbour Conservancy should be consulted.

The policy only addresses increased recreational disturbance due to new housing; however, due to potential risks and impact pathways some development may need to consider other impacts such as those on water quality, light intrusion and noise etc. To address this, development policies should have additional text to state that development will only be permitted where "*the development includes measures to avoid and mitigate any adverse effect on the integrity of European sites*".

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to include:

- A map which shows all three Special Protection Areas (SPAs) along with the 5.6km buffer.

It is envisaged that this policy will seek to mitigate recreational impact on the SPA (the policy title may need to be amended to reflect this). Therefore, the suggestion that the policy should have regard to other adverse effects (i.e. water quality, light intrusion and noise) on the integrity of European sites, should be considered as part of Policy E15 (Ecological Conservation).

Comments where no change is considered necessary:

- Havant Borough Council's Cabinet approved the Solent Recreation Mitigation Strategy, along with its implementation from 1<sup>st</sup> April 2018 onwards, unanimously on 7<sup>th</sup> February 2018
- The HRA considers whether on-site measures may be needed alongside a contribution to the strategic project. This has led to several references in site allocations to this. This matter will be continue to be assessed through the HRA process.
- The policy has been drafted in line with the Solent Recreation Mitigation Strategy, the strategy seeks to actively encourage coastal visitors, but so that visitors enjoy their time in a responsible manner rather than restricting or preventing access to the coast
- All the sites proposed for allocation are in the 5.6km zone of influence; therefore, a developer requirement that states mitigation for recreational disturbance is provided in line with this policy for all sites may not be required
- Natural England are the government's adviser for the natural environment in England and are thus a statutory consultee for certain types of planning applications. Both the Langstone Harbour Board and the Chichester Harbour Conservancy are not statutory consultees; however, they are both welcome to comment on whichever applications they wish to

## E17 - Brent Goose and Wader Feeding and Roosting Sites

11 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The policy is welcomed and supported.

The Solent Wader and Brent Goose Strategy is finalised; minor wording changes will be required.

Support for the adoption of land as permanent wader and Brent Goose refuges. It is recommended that the potential refuge areas are identified on the Proposals Map.

Support for the flexible approach taken to mitigate any impact development on the support areas.

The policy is compliant with Paragraph 113 of the NPPF which establishes a requirement for local authorities to weigh decisions on development affecting protected wildlife against their importance and contribution they make to the wider ecological network.

Submitted wording amendments for paragraphs 5.210, 5.211, 5.213 and 5.217.

It is critical that the network of sites available to Brent Geese and waders is future proofed to account for climate change and coastal erosion. The Solent Wader and Brent Goose Strategy is being updated; it is anticipated that future important sites will be considered, this will need to be reflected in the HBLP 2036.

It is welcomed that the individual site allocations highlight the need for mitigation in line with Policy E17.

All sites identified as affecting wader and Brent Geese should consider in their design and layout:

- The need to ensure any aim to improve access or provide open space are considered holistically, to ensure areas used by the birds or proposed as mitigation and not undermined by recreational disturbance
- That access management should be identified as a necessary consideration with Policy E17

Under both Core and Primary Support Areas, wording should be included to reflect the importance of the Core and Primary Support Areas and how it is envisaged that any development that is likely to impact these sites would be considered as part of the Local Plan process.

The classifications in some areas do not reflect survey findings; e.g. sites which surveys have shown to be unused are listed as Secondary Support Areas.

The policy should be amended to set out that any loss of habitat must be replaced prior to development but it cannot require it to be evidenced that it works.

No evidence has been produced to support the need for an 80-year management commitment for mitigation areas. This is more than previous requirements, i.e. 25 years.

Disagreement that in-perpetuity can be defined as 80 years and that it is not an appropriate interpretation of the legal requirements. Suggestion to change criteria e) and g) to '*for a minimum of 80 years by a legal agreement*'.

The policy only allows for financial contributions for mitigation on low use and uncertain sites, this should be amended to allow a contribution for all circumstances if it can be demonstrated it has wider benefits.

There is no legal or policy basis for the assumption that proposals with the potential to impact upon sites forming part of the Brent Goose supporting habitat network will require a project level Habitats Regulations Assessment (HRA).

The assertion that the network of supporting habitat sites are effectively part of the SPA is incorrect and baseless. Although it plays a supporting role, the sites have not been deemed of sufficient importance to be brought within the Natura 2000 network of sites. Losses to the network should not be considered synonymous with losses to the SPA.

There is no clear definition of how the proposed hierarchy of supporting habitat sites have been derived and how particular sites are attributed to different classifications. There is limited evidence for the designation of Land at St Mary's Road (Land at Rook Farm) is a Core Area.

## CORE AREAS:

Criterion c) - Amend typo.

The policy and its supporting text are contradictory in relation to Core Areas; the later asserts that it is not considered feasible to provide avoidance and mitigation measures yet the policy states it is possible in exceptional circumstances.

It is unclear why there is a requirement for any mitigation areas to be in close proximity to the supporting site being lost; it is apparent from the current Solent Waders and Brent Goose Strategy (SWBGS) that birds will use any site in the vicinity of the SPA that provides foraging opportunities.

It is unclear why the provision of a greater area of mitigation land is required for the loss of Core Areas when the same requirement does not apply to the loss of Primary Support Areas.

Wintering Bird Surveys undertaken on Land at Rook Farm (between November 2017 and February 2018) have not recorded any Brent Geese utilising the site due to its current management regime (ploughed field). Where a site is unavailable for at least one winter due to standard agricultural management practices, and this does not result in any significant impact to the SPA populations, then a site is not essential to the continued function of the SPA.

## PRIMARY SUPPORT AREAS:

Proposed site H31 was used as a mitigating area for the Oysters development so should not be built on.

Disappointment in seeing sites identified as Primary Support Areas included in the Draft HBLP 2036.

Questions raised as to why Southern Water's Budds Farm Waste Water Treatment Works (WTW) is a "Primary Support Area" (Figure 24).

Paragraph 5.222:

- This needs to be revised to reflect that until a mitigation package has been considered for the loss of a primary support area, that it is not possible to confidently conclude that this opportunity exists.
- Amend second sentence to read '*While the use of these sites may on occasion pass the threshold for classification as the Core Sites, development on parts of these sites may be acceptable*'.
- Amend third sentence to read '*It is considered that there may be opportunities for these sites to feasibly secure mitigation to ensure the long-term preservation and enhancement of the Brent Goose and Wader network, which will be considered on a case-by-case basis*'.

Paragraph 5.223:

- It is agreed that the mitigation package must be "robust".
- It would be inappropriate to lose a primary support area to secure the maintenance of a nearby core site; it is requested option i) is deleted.

Objection to the provisions of Policy E17 and the strict requirements it sets for development proposals coming forward on wader and Brent Geese feeding and roosting sites.

It is recommended that the policy text and associated maps for H31 and H41 outlines the nature, size and scale of mitigation that will be required to ensure that appropriate measures can be adequately secured by any forthcoming planning application. This may include the extent of the proposed refuge area as well as essential criteria that will need to be included in the costed management plan such as habitat management, fencing, screening (ditch and fencing) of adjacent footpaths, interpretation and viewing platforms as necessary.

Insufficient evidence and rationale has been provided for the assignment of the proposed site designations.

## SECONDARY SUPPORT AREAS:

Further clarification is needed regarding the role of Secondary Support Areas prior to criterion f). Suggestion to include the following paragraph: '*Secondary support areas offer a supporting function to the core and primary support ecological network. These sites become important when wader or Brent Geese populations are higher or when the habitat is in suitable management. The use of sites by Brent Geese varies between*

years as a result of a number of factors including population size, breeding success of the previous summer and number of juvenile birds”.

#### **LOW USE & UNCERTAIN SITES:**

It is strongly recommended that Low Use and Uncertain Sites are treated separately; this should be reflected in the policy and supporting text to provide greater clarity.

It is important that low use sites are not undervalued and that the proposed text provides greater clarity regarding the need to consider the potential role of these sites now and going forward.

Further clarification is needed regarding the role of Low Use/Uncertain Sites prior to criterion h). Suggestion to include the following paragraph: “*All Low Use/Uncertain sites have recorded use by Brent Geese Waders and have the potential to be used if managed appropriately and therefore in all cases proportionate mitigation / enhancement measures will be required*”.

Both Low Use and Uncertain sites will have evidence of use of at least one record since the winter 2006/07, therefore it is recommended that criterion h) is amended to ‘*If it can be shown that neither Brent Geese nor waders no longer use....*’

The survey requirements to demonstrate that the land is not used by waders and/or Brent Geese are again three continuous years (previously two was often accepted), during such time the site must be kept in a suitable condition for use by waders and Brent Geese. It would not be lawful of Havant to impose restrictions on how landowners manage their land with the threat of refusing development in the future. This element needs removing from the policy to ensure it is sound.

Figure 24 - The map has recently been modified, HIWWT can provide replacement.

#### **HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft with wording amendments, along with an update to Figure 24 once the Solent Waders and Brent Goose Strategy (2018) has been published. In addition, consider whether the policy should be amended to include:

- Any future important sites (due to climate change)
- The suggested deletion of option i) of paragraph 5.223, which offers the possibility of mitigating development on a primary support area by improving a nearby core site
- Further clarification about the role of Secondary Support Areas [it may be more appropriate to include such wording within paragraph 5.228 rather than prior to criterion f) as suggested]
- Further clarification about the role of Low Use/Uncertain Sites [it may be more appropriate to include such wording within paragraph 5.230 rather than prior to criterion h) as suggested]
- The identification of the potential Brent Goose Refuges on Figure 24 and Proposals Map
- The scale, size and nature of mitigation required on any primary support areas allocated for development in the HBLP 2036 [please note: this will be included in the upcoming Havant Biodiversity Strategy]
- Wording in the supporting text which clarifies that development on core and primary support areas has been and is being considered as part of the Local Plan process.
- Clarity over whether development on Core Areas is not feasible or if it is possible in exceptional circumstances
- Budds Farm WWTW boundary will be redrawn to remove the built areas of the facility within data and maps in the finalised strategy. This specific change will be reflected in the Pre-Submission Local Plan.
- An amendment to clarify that the effectiveness of mitigation would not need to be proved prior to the commencement of house building but that it should follow the best scientific information at the time

It has been suggested that all allocated sites in the plan identified as affecting Solent waders and Brent Geese should consider, in their design and layout requirements, the access management and location of open space so that mitigation is not undermined by human recreational disturbance. Whilst the Council agrees with this suggestion, we do not believe that it is appropriate to reference this in every site allocation

which affects Solent waders and Brent Geese. Instead, this should be included in the policy and supporting text of this policy (E17).

Further investigation is required to ascertain whether in-perpetuity can be defined as 80 years or whether an explicit statement that mitigation must be secured for a minimum of 80 years by a legal agreement is necessary.

**Comments where no change is considered necessary:**

It is appreciated that the content of this policy could have been confusing given that it was not based on a published Solent wide approach as previous policies have been. However it was prepared in line with the emerging Solent Waders and Brent Goose Strategy and in consultation with Natural England. The updated Solent Waders and Brent Goose Strategy (2018) is being prepared and will be published in due course and will inform the Pre-Submission version of the Local Plan.

The Council will use the updated strategy, along with further ecological work from the Local Nature Partnership (LNP) and the Hampshire Biodiversity Information Centre (HBIC) and evidence of previous mitigation measures (e.g. Oysters, Hayling Island), to ascertain appropriate ecological/wildlife corridors in the Borough within the Havant Biodiversity Strategy. The scale, size and nature of the proposed Brent Goose Refuges, along with the mitigation required for any Primary Support Areas allocated for development in the HBLP 2036 will also be outlined in the biodiversity strategy and future revisions of this policy.

Due to the high need for housing in the Borough, it is not possible to avoid development on two Primary Support Areas (H31 and H41). As such, it is important that these sites, and their status for Solent waders and Brent Geese, are identified in the local plan so that appropriate mitigation which contributes to the wider solent wader and Brent Goose network is secured.

The Council disagrees with the suggestion that financial contributions for mitigation should be allowed for all circumstances and not just for the development of low use and uncertain sites. To protect and, where possible, enhance the solent wader and Brent Goose network, it is vital that physical mitigation is provided upfront. Moreover, for comments regarding survey requirements for low use and uncertain sites, it should be noted that the emerging Solent Waders and Brent Goose Strategy (2018) has significantly reduced the amount of uncertainty relating to the use land by these species. The Council will also continue to survey sites to improve further certainty.

The Council considers that the loss of sites which are confirmed as functionally linked to the SPA requires assessment under the Habitats Regulations. These species are the qualifying criterion for the SPA designation. These feeding and roosting sites are, therefore, functionally linked to the SPA and, as such, are worthy of the level of protection as set out in the wording of this policy. Furthermore, the HRA handbook states that, regarding any species listed in Annex I of the Birds Directive (and regularly occurring migratory species not listed in Annex 1), competent authorities are required “*to strive to avoid pollution or deterioration of the habitats of such species outside the area of classified SPAs*”.

From the above, the Council asserts that there is a legal/policy basis that potential impact upon sites forming part of the Solent Wader and Brent Goose network would require a project level Habitats Regulation Assessment (HRA). Please see [advice from Natural England regarding functionally-linked land the consideration of a HRA](#) as well as Regulation 63 of the Conservation of Habitats and Species Regulations 2017.

## E18 - Protected Species

5 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for the policy.

Paragraph 5.236 - This should include a reference to Solent Waders.

Paragraph 5.249 - Regarding Havant Thicket Reservoir (KS8), there is concern that Portsmouth Water may be seen as having ‘*deep pockets*’ to fund ongoing monitoring to confirm no overall harm to the species.

Previous survey work has shown that Bechstein’s bat utilise KS8 for foraging; a maternity roost has been recorded using parkland trees adjacent to the site also.

Concern that the current wording may create a barrier to obtaining planning permission for the Havant Thicket Reservoir (KS8). The development will not be able to show no net loss of woodland; instead Portsmouth Water’s mitigation strategy would be focused on ensuring that connectivity is maintained between the woodland blocks north and south of the proposed reservoir by planting a new woodland strip east of the reservoir and enhancing boundary hedgerows.

It is important to ensure robust monitoring of mitigation measures is carried out as mitigation measures for a species which is known to avoid artificial illumination (Bechstein’s bat) are untested.

Criterion f) - Suggestion to add that the removal of individual trees should also be avoided. This because previous surveys have identified roosts within standard trees within fields with Bechstein’s bats foraging in adjacent woodland. This is similar on the continent where the species is associated with parkland-type habitat.

It is recommended that the HBLP sets out a strategic approach to plan positively for the creation, protection, enhancement and management of networks for biodiversity and protected species.

It is recommended that ecological corridors are established in the forthcoming Havant Biodiversity Strategy to enhance wildlife links:

- From the proposed Brent Goose refuge at Broadmarsh north along the A3(M) corridor (encompassing H15 and H41)
- From the coastal area south of Warblington, through KS5 and the Emsworth Common through multifunctional green infrastructure
- In the north of the Borough as identified by the Bechstein’s bat area

No support for the final paragraph in the policy box as this provides developers with a ‘get out’. Suggestion to replace with ‘*Where the above measures cannot be met planning permission will be refused*’.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments. The forthcoming Havant Biodiversity Strategy will consider how to incorporate the recommended ecological corridors once the Council has received the ecological network mapping work undertaken by the Local Nature Partnership (LNP). The incorporation of the LNP’s work will also help inform the positive strategic approach, recommended above, for the creation, protection, enhancement and management of the Borough’s ecological networks and its protected species.

Comments where no changes are considered necessary:

The final paragraph in the policy box is considered to comply with the Habitats Regulations.

## E19 - Best and Most Versatile Agricultural Land

10 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for the policy.

The policy should include a map or a list of areas which contain BMV agricultural land.

New agricultural land classification (ALC) surveys may be required for sites allocated in the plan.

It is strongly recommended that appropriate agricultural land and soil surveys are undertaken for sites on BMV agricultural land so that the land of highest agricultural quality is retained as areas of open space within a development's master plan.

BT&W v SSCLG and Gladman Developments Ltd [2016] EWHC2 concluded that Paragraph 112 of the NPPF cannot be characterised as a policy which indicates that "development should be restricted" within the context of Paragraph 14 of the NPPF (and associated footnote 9).

There is no justification to refuse permission on sites that constitute BMV agricultural land.

Sites of BMV agricultural land should not be developed.

Agricultural land should be sold to the Council at the original designated agricultural cost for the benefit of Local Council owned housing in order to provide homes for the homeless.

Objection to the on-site community growing provisions (e.g. allotments) as part of onsite open space requirements as the Site H28 will result in a net increase of 45 and not 50 dwellings.

Southleigh (KS5) is allocated for development, yet perversely, Policy E19b now protects BMV land.

It cannot be right to use prime agricultural land to build new homes; once this land is built on it will never again be available to grow food. With uncertainty over Brexit, we may need all our agricultural land.

The use of prime agricultural land for housing on Hayling Island is short-sighted given then local food production is healthy and helps cuts down heavy lorry deliveries.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to:

- Clarify that criterion a) requires that greenfield sites allocated for 50 dwellings or more (gross), which contain BMV agricultural land, must include community food growing provisions as part of the open space required under Policy E2
- Include a link to the sources used to ascertain a site's agricultural land classification (ALC) as listed in Appendix 2 in the Sustainability Appraisal of the Draft Local Plan 2036 (December 2017)
- Include a requirement that agricultural land and soil surveys are undertaken for sites on BMV agricultural land to ascertain the location of the highest quality soil and, thus, inform the location of open space and community food growing provisions

Comments where no change is considered necessary:

When considering sites suitable for allocation, the Council has sought to prioritise brownfield sites and greenfield sites of lower agricultural quality. However, the available evidence is that the majority of land in the Borough is of the best and most versatile (BMV) quality. Therefore, the allocation of housing sites of BMV agricultural land is unavoidable if the Borough is to meet its housing need. In order offset the loss of BMV agricultural land, the policy identifies a need for development on land of BMV quality to include community growing provisions (such as allotments) as part of the open space provision. Please note,

criterion b) refers to unallocated greenfield sites, therefore the criterion would not apply to the development of Southleigh (KS5).

It is considered that as the HBLP 2036 is aiming to meet and exceed the Borough's objectively assessed need (OAN) for housing, best and most versatile (BMV) agricultural land should be safeguarded in line with paragraph 112 of the NPPF. It is not explicitly stated that planning permission will automatically be refused on unallocated greenfield sites. The wording of the policy states that permission on unallocated greenfield sites containing BMV agricultural land is '*likely to be refused*' and '*unlikely to be supported*'. This indicates that there is still some scope for flexibility if further material considerations arise.

The Local Plan cannot require land to be sold to the council to provide housing.

## E20 - Amenity and Pollution

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support policy as amenity is important for visitors so that they are not deterred.

Reference possible adverse impact of lighting glow on South Downs National Park.

Tranquillity and associated visual and noise intrusion mapping should be referenced.

Lighting requires careful planning and monitoring to ensure local areas are safe and there are minimal impacts on wildlife and their corridors. The Borough should play its part in preventing light pollution.

South Downs International Dark Sky Reserve is less than 10 miles from the Borough's boundaries.

HCC support this policy.

HBRA are concerned regarding traffic congestion and air quality across the Borough and particularly where there is poor air quality around schools such as Park Road South next to Bosmere School as this is likely to worsen with additional traffic movements in the Borough as new housing and employment sites are developed.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with minor wording amendments.

Further evidence required:

A sub regional assessment of air quality following proposed development is underway which will examine the impacts on human health and include recommendations for mitigation.

Comments where no change is considered necessary:

The NPPF is clear that planning policies should be focused on the acceptable use of the land (rather than environmental control processes). The policy considers light and any significant negative effect on 'the wider environment', both in terms of the national park and habitats.

In terms of potential impacts on tranquillity, it is considered that the policy already sets out an appropriate approach to the assessment of noise.

Visual impact considerations are adequately addressed through policies E6 (High Quality Design) and E10 (Landscape and Townscape) policies.

## E21 - Contamination

2 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Welcomes the policy and appreciates acknowledgement to material risk to groundwater.

Support the inclusion of this policy.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments.

## E22 - Aquifer Source Protection Zones

2 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The policy should be broader and also deal with the ecological needs of watercourses

The policy does not integrate surface water management considerations

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft.

Comments where no change is considered necessary:

- Consideration of the ecological impact of development is provided through policy E15
- Consideration of surface water management is provided through policies E13, E20 and IN4 as well as through individual site allocation policies

# Housing

# H1 - Housing Need, Supply and Brownfield Sites

18 responses were received regarding this topic

## Summary of key comments raised by residents and other stakeholders

### Housing Need/Target

The identified housing requirement should be accommodated in the Local Plan, unless there are policies elsewhere in the National Planning Policy Framework that provide strong reasons for restricting development.

Support for approach to meeting housing need and meeting Objectively Assessed Need (OAN).

Support the intentions of Policy H1 to exceed the average annual requirement for new homes in Havant Borough when assessed against the PUSH OAN (2016 SHMA update) and the PUSH Spatial Position Statement.

Evidence of a shortfall of identified capacity to meet needs in the Portsmouth housing market area of almost 4,200 homes. Would continue to urge Havant Borough Council to actively seek opportunities to identify additional potential for housing provision in line with the PUSH Position Statement.

Concern that there is a significant unmet need which is not being effectively planned for in the HMA and which is unlikely to be met. Implications for Duty to Cooperate and Test of Soundness.

Concern that the proposed distribution of housing set out in the PUSH Spatial Position Statement sets housing significantly lower the needs assessment for both the Portsmouth and Southampton HMAs.

Use of Government's proposed standard methodology for housing need supported.

Support for committing to the higher annualised requirement from Government proposed methodology for calculating housing need although this is subject to change and cannot be given full weight until it is adopted.

The Council should be mindful about any changes that arise to the Government's methodology as currently proposed before its introduction.

The PUSH Position Statement's policy H1 suggests that *'local authorities should actively seek opportunities to identify additional potential for housing provision to address the shortfall against the objectively assessed need through the local plan process'*. It appears that the Plan has sought to do this and this approach should be maintained in view of the wider needs of the PUSH area.

Policy in line with PUSH Position Statement Policy H1.

Greater clarification in simple terms of how the figures are derived would be welcome.

Question over validity of the total housing need.

There should be a greater level of scrutiny of the figures rather than taking these at face value.

Objection to the housing number in the draft Local Plan on the basis that Havant is being expected to take considerably more than its own indigenous need should suggest. This has a knock-on effect on the number of greenfield sites required.

Concern that none of the PUSH calculations or reports on housing numbers have been subject to public consultation or scrutiny by an independent inspector.

Derivation of the figures in the PUSH Spatial Position Statement and how it differs from calculations of the PUSH SHMA is not clear and has not been subject to consultation.

Concern that people are being double counted (between neighbouring authorities) due to calculations for household growth including an element of encouraging people into the Borough to drive economic growth.

New OAN proposal from DCLG include uplift of 32% over ONS demographic forecasts to address affordability. Concern expressed that house pricing is not only driven by supply and demand.

If exceeding demographic demand did bring down house prices, firstly the builders would stop building (as their profits would slump) and secondly every existing house owner would be in negative equity. And we would be back to a sub-prime crash again as in 2007.
Figure of 9,549 dwellings for 2016-2036 equates to 477 dpa, higher than all other alternative scenarios and again a 32% increase over the demographic requirement.
There are new demographic projections since the OAN draft calculation and from ONS due in 2018 which could change those currently being used. The latest 2016-based population projections released by ONS show that by mid-2041, populations are projected to be lower than in the 2014-based projections in all broad age groups with the exception of those in their early 50s to early 70s.
The evidence behind housing requirement, where are the people coming from? Are we housing other people moving from other boroughs? A lot of talk about ageing population and whilst this may be accurate to a degree, to counter this local young families are only supposed to be having 1.2 children, it must balance out somewhere without the need to urbanise every last non protected piece of land in the borough?
The housing requirement should be expressed as a 'minimum', with the policy being reworded to include the wording "at least".
If a 5 percent buffer is applied to the identified housing need figure for the Plan-period (i.e. 9,260) then the supply required would equate to 9,723 dwellings. The supply identified in Table 6 would fall short of this.
Concern that a significant proportion of the housing need is to be delivered through Southleigh strategic site.
Moving base date to 2016 has meant previous shortfall has been ignored.
Housing shortfall should be addressed in the first five years of the plan. Further allocations are needed to ensure housing requirement is delivered in plan period and to give the plan sufficient flexibility.
Concerns that the recent under delivery of housing in the borough may have suppressed household formation for the years that the new household projections will project forward.
The plan presents a housing allocation which at face value looks like a decrease from 11,500 to 9,500, but the baseline has moved from 2016 to 2018 so the Plan is actually an increase over the original plan for the period 2016-2036. The Hayling Island Plan, for example, has risen from 550 to 999.
<b>Buffer</b>
Justification for a buffer not acceptable.
Support for buffer.
The Local Plan should ensure that sufficient headroom exists to accommodate future amendments to the methodology in addition to flexibility that will be required in relation to the application of the relevant buffer.
<b>Housing - General</b>
Less sensitive sites have been coming forward with higher numbers than in the draft Local Plan. Therefore, more sensitive sites don't need to be allocated.
The Draft Plan cites several examples of planning permission given for small developments. This is disingenuous and should not be taken as precedent for large neighbouring developments of 50+ houses.
Support for initiative to build on brownfield sites wherever possible.
Number of houses proposed on brownfield seems low compared to greenfield.
The Council should be more proactive and identify derelict or non-performing industrial sites for housing.
Bringing forward a greater number of greenfield sites is likely to facilitate the provision of a wider range of housing types and sizes (in accordance with paragraph 50 of the NPPF and SHMA).
Care should be taken over impact of development on environments/ecosystems.

Most housing allocations are within the 5.6km 'zone of influence'. Each policy should include reference to Policy E16.

Support of inclusion of L152 in Policy H1, however, they should be excluded from the necessity to provide Site Specific Infrastructure Delivery Statements if they are 5 or more units, or clarification they are all classed as 'allocated sites'.

Concern that the reliance on previously developed land and other constrained sites has the potential to impede and delay delivery.

The Council have failed to robustly justify the inclusion of a number of sites which are not proposed for allocation (but which are listed within draft Policy H1) within their claimed housing supply.

The plan should be amended to allow the development of additional smaller sites (5-10 dwellings) where housing delivery can be achieved earlier in the 5-year period.

Concern over neighbouring authorities putting lots of development on Havant's borders despite them having plenty of other land (Winchester and Chichester) and it all becoming a little too joined up - why is pressure not put on these boroughs to resolve their problems rather than soak them into the Havant area?

Number of homes in Emsworth should be substantially lowered. Emsworth will become less attractive, dull and an amorphous mass of urban development.

### **Policy Wording**

Wording of H1 (c) not clear - relationship between text and table not explained. Status of sites in table not clear.

Policy H1 should refer to the 'Brownfield Register', noting that sites listed in the Register are 'in-principle' suitable for redevelopment.

It is not clear how the supporting text (para 6.19) relates to draft Policy C2 Protection of Existing Employment Sites. Emerging Policy C2 sets out specific criteria specifying in what circumstances employment land may be redeveloped for alternative uses. Yet paragraph 6.19 simply states that "Land allocated for industrial or commercial use can be used for Starter Homes where this land is underused or unviable for those purposes". This is a very general statement, which implies that a lower evidential threshold for assessing the acceptability of a proposed change of use, would apply where Starter Homes were proposed. Yet, the Draft Local Plan contains no other Policy references to Starter Homes.

### **Windfall**

Inclusion of garden land in windfall assessment is not consistent with national policy and should be removed.

Windfall/unplanned development are putting increased pressure on infrastructure. This is not being managed formally.

Projected windfall figures are incorrect - they should be based on historical data.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft, with potential wording amendments. In addition, consider whether:

- The housing requirement should be expressed as a minimum
- Further explanation is needed regarding status of sites in the Table in H1
- The Brownfield Register should be referenced
- Reference to starter homes on underused or unviable industrial and commercial sites should be referenced
- Any shortfall or oversupply from 2011 to 2016 should be set out, although this may be better expressed in the SHLAA

Comments where no change considered necessary:

- The draft HBLP2036 makes provision for sufficient housing sites to meet the identified need.
- The Council will continue to work with other authorities within the Portsmouth Housing Market Area under the Duty to Cooperate with regard to any unmet housing need
- By the time the HBLP2036 reaches submission stage the Government's standard methodology will most likely be finalised and will be able to be given full weight. This will be reviewed as the plan progresses.
- Paragraphs 6.3 to 6.5 explain how the housing target was derived
- The total housing need is based on the Government's draft standard methodology
- The Government's standard methodology for calculating housing need means that the approach to determining housing targets is consistent across the country. Therefore, it is considered that the figures included in the PUSH SHMA and Spatial Position Statement are no longer the most up to date and referenced in the Local Plan only for background information.
- Concerns regarding the Government's methodology are beyond the remit of the HBLP2036
- ONS projections of household growth should be the demographic baseline for every local authority area form the baseline for the Government's methodology for calculating housing need. The consultation document indicates that the most recent official projections should be used.
- The 9,549 figure includes a buffer which is required by the NPPF to allow sufficient flexibility to adapt to rapid change
- There is no requirement to apply specifically a 5% buffer to the housing need figure
- Whilst Southleigh provides a significant proportion of our identified housing supply, the HBLP2036 includes a range of site types and sizes to ensure housing delivery in both the short and long term
- The 11,250 figure represents the total Objectively Assessed Housing Need (OAN) between 2011 and 2036 that was identified in the SHMA. This was superseded by the Government's proposed standard methodology for calculating housing need. The new methodology shows there is an annual requirement of 463 net new homes in the Borough from 2016. This gives a total need figure of 9,260 from 2016 to 2036 (the plan period). The base date of the Local Plan is 2016 and has not moved to 2018. The 9,549 figure is the number of homes the plan will deliver to meet the need of 9,260 with a buffer to allow for flexibility (this is a requirement of the NPPF).
- All sites that have been assessed as being suitable for development were included as allocations in the Draft HBLP2036.
- Whilst some sites have already come forward with higher numbers than in the plan, some have come forward with less. Achieving a greater number of dwellings of some sites does not justify the removal of other more sensitive sites as the housing need is a minimum plus we are required to have a buffer to allow for sufficient flexibility to adapt to rapid change.
- Existing planning permissions do not set a precedent for large neighbouring developments. Each site is assessed on its individual merits through the Strategic Housing Land Availability Assessment (SHLAA) and the Sustainability Appraisal (SA)
- Sites are required to be available for development in order for us to allocate them. In addition, it is important to protect employment sites to secure jobs in the area as well as meeting our housing need.
- The Council has sought to maximise the potential of previously developed land or brownfield sites.
- The plan includes polices relating to environmental protection
- The plan is designed to be read as a whole so it not considered necessary to reference E16 in every allocation.
- Whilst there are a number of brownfield sites allocated that tend to be more constrained, there are also a number of greenfield sites. It is considered that this mix will ensure continued housing delivery in the Borough.
- Sites listed in Policy H1 are allocations on brownfield sites which are free from site specific constraints. They carry the same weight as sites with specific allocations. Therefore, it is correct that these are included in our housing supply figures.
- The plan includes a mixture of site sizes. Efforts have been made to allocate sites of 5-10 dwellings, however, it is dependent on what sites are available.
- Surrounding authorities are in the same position in terms of having to meet their housing need.

- Since the draft Local Plan was published the Government has proposed changes to the NPPF regarding starter homes. The plan will be updated to reflect this once the NPPF has been finalised.
- The NPPF is not supportive of the inclusion of garden land as windfall development but the Council believe there is clear evidence and policy support that supply from this source will continue
- Windfall sites are under the same obligations as allocated sites in that they must pay CIL which feeds into infrastructure delivery. Housing completions, including windfall sites, are continually monitored and reviewed in terms of housing supply.
- The windfall allowance has been calculated based on an analysis of previous windfall/unidentified residential development in the five areas of Havant Borough from 2006/07 to 2016/2017

## H2 - Affordable Housing

23 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

30% would see a reduction in current affordability levels which are set at 30-40% of new developments (Policy CS9). HCC would welcome retention of 30-40% of new developments for affordable homes. Would value an increase on 20% rented and intermediate housing provided in the town centres to ensure that those living in affordable housing have good access to local amenities and work opportunities.

Concerns that affordable housing is not being provided / affordable housing requirement is negotiated away by the developer.

Subsidising new housing and disguising the subsidy by calling it "affordable housing" does little more than maintain the very high prices in the South East for unsubsidised new building.

Provision of social housing will not be adequate and local families will be reliant on private sector rented housing.

Concern that the commuted sum towards the provision of offsite affordable housing (when providing social housing on site is not viable) is too low.

Making a payment to the Council for affordable housing will be no use to Emsworth as there will be no further space to build.

Products are not affordable - plan should secure affordable houses which are truly affordable for local people.

Concern that the price of new homes is almost 11 times more than the average annual income, so many local residents excluded from living in the town in which they were raised. Help to Buy and similar schemes help some people to get onto the property ladder but also push up prices.

Those on the Hampshire Homes Register and in temporary accommodation are unlikely to benefit from the homes envisaged in the Draft Local Plan (DLP). It is not clear how many of the new homes will be affordable to rent (or buy). In any event developers have the option of buying their way out of affordable provision. The rentals sector has been left mainly to private landlords where rents are up to twice the cost of buying a home and often exceed the limit of housing benefit.

The term "affordable housing" is frequently used when justifying a proposal, but the definition of that word is too ambiguous and widely abused. The mass housing market is the creation of volume house builders, who generally seek easy schemes on greenfield sites to maximise profit with the minimum of effort. This emphasis is misguided and should be resisted.

Provision of affordable housing in the Borough is led by market housing through HBC's percentage requirement for affordable housing delivery on sites. HBC do not build and manage new affordable housing stock and as a result the Borough publish high demands for general housing growth to meet the affordable housing needs artificially pushing proposed allocation numbers up and exposing unsuitable areas to development.

The tenure split should be flexible rather than a 70/30 split - changes recommended to ensure consistency with national policy.

The standard split of 70% affordable rent and 30% intermediate is outdated and no longer supported by Registered Social Landowners. Amendment required to reflect the allowance for discounted market housing and shift towards provision of Starter Homes to provide balanced mixed communities. Tenure split should be on a site by site basis rather than default 70/30 split.

Concern that an off-site financial contribution may be accepted in lieu of on-site provision.

Support for off-site affordable housing contribution on constrained sites.

The policy does not provide for the delivery of Starter Homes.

Viability should be determined on a case by case basis.

Overemphasis on the principle of development viability and concerns over willingness to accept reduced affordable housing requirement

The policy should provide flexibility to enable the Council to consider a reduced level of provision where development is unviable.

Reference to 'open-book' assessment should be included within the body of the policy - clarification on what is needed should be included within the supporting text.

40% affordable housing target should apply in the Emsworth Neighbourhood Plan area.

A lower threshold than 11 dwellings should be set.

A suggestion that the Stamp Duty holiday should be extended to shared ownership properties.

A suggestion to reduce CIL or planning fees for affordable homes as an incentive to developers.

Social housing should be kept separate from market housing - concerns over litter and vandalism.

A more realistic affordable housing target (10%) should be set for retirement housing.

Support for an affordable rent to buy model.

Suggestion for self-build plots on larger developments to enable skilled trades' people who are unable to buy their own homes but have the skills to build one.

In order for the plan to be sound, as considered against the tests of soundness set out in paragraph 182 of the NPPF, the Council should ensure the following actions are taken: That the affordable housing requirement in lower value areas be reduced to reflect the viability evidence.

#### **HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider how the policy may be amended to include the following criteria:

- Set out the Council's approach to the consideration of a reduced affordable housing requirement on viability grounds
- Clarify how affordable home ownership products including Starter Homes will be considered, having regard to the Revised NPPF consultation proposals
- An additional criterion to cover a reduced affordable housing requirement for retirement/sheltered housing, informed by the findings of the Local Plan and CIL Viability Study

Affordable housing is currently defined as in Annex 2 of the National Planning Policy Framework. The policy and supporting text will need to be revisited pending forthcoming changes to national guidance.

Comments where no change is considered necessary:

Though the Core Strategy policy (CS9) currently identifies a range of 30-40%, the council is only able to secure 30% affordable housing on the vast majority of developments, but viability will vary with site-specific circumstances. This is reflected in the findings of the Local Plan and CIL Viability Study which indicates the majority of developments would be able to support a 20% affordable housing requirement in Havant, Waterlooville and Leigh Park town centres, and a 30% affordable housing requirement outside of the town centres.

Paragraph 6.31 of the supporting text confirms that there is a very strong presumption that affordable housing will be provided by the developer on the development site. Only in exceptional circumstances where justified by robust viability evidence, the Council will consider accepting a financial contribution in lieu of on-site provision. It is considered that this approach will make sure that wherever possible affordable housing is provided on site, whilst providing for an appropriate degree of flexibility where this is not practicable. Criteria c of the policy indicates that the tenure of affordable housing is split 70% rented and 30% intermediate (shared ownership), and that the appropriate split will be negotiated on a site by site basis

based upon the latest evidence of locally identified needs. The Council considers this to be an appropriate tenure split based on the advice and guidance from Registered Providers.

Affordable housing will be primarily secured through market housing-led schemes. As drafted, it is considered that the policy provides a more clear and robust framework for securing affordable housing provision that is currently provided through the Core Strategy (2011). The policy approach has been informed by feedback received from Members' at Local Plan Panel and the Members' Local Plan workshop meetings. Any changes proposing additional flexibility will be considered with that approach in mind.

The Draft Local Plan has been informed by the Government's proposed methodology for calculating housing need takes affordability into account. The Council has considered sites across the borough for allocation to meet the Borough's housing need. The suitability of site allocations has been considered through the Council's SHLAA and Sustainability Appraisal.

Paragraph 6.26 confirms the affordable housing requirement is a minimum. As drafted, the Plan affords sufficient flexibility to enable the Emsworth Neighbourhood Plan to set an increased affordable housing requirement in broad conformity with the Local Plan.

Under national policy, the Council is not able to require affordable housing on sites of less than 11 dwellings.

The interaction between affordable housing provision and CIL is considered through the Local Plan and CIL Viability Study.

The even distribution and integration of affordable housing across the development in line with Policy E6 is an appropriate approach, and a key principle in securing sustainable communities.

Stamp Duty and planning fees are not matters for the Local Plan to consider.

### H3 - Housing Density and Mix

11 responses were received regarding this topic

#### Summary of key comments raised by residents and other stakeholders

Support of policy.

Smaller properties are more affordable and should be encouraged, particularly on larger strategic sites.

Quality smaller homes are needed to meet downsizing requirements.

A larger amount of flexibility should be considered for housing mix to reflect specific requirements relevant to an individual application.

The housing mix should not be applied to every site but rather reconstituted as an overarching target, to be achieved on average, and on an on-going (Borough-wide) basis. Over provision for 2 bed properties in high density town centre dwellings should be reflected by a lower need for 2 bedroom dwellings in lower density schemes.

Concern that an overprovision of smaller units over the plan period may occur.

The private mix of housing should be market led. Developers will build a mix of housing that is most in demand for that area.

Building large detached and semi-detached homes does not meet the local housing need. Housing development should be suitable for people who need them such as key workers, public services staff, OAP's. Building larger homes should only be allowed once those needs are met.

Housing should meet all needs including those for 5 and 6-bedroom houses.

The ratio of "starter" and smaller homes is too low.

The density of development requirement is too prescriptive. The density of a scheme should be based on a holistic and well evidenced understanding of the capacity of the site.

The density of sites does not account for site constraints or viability considerations.

35% of the housing mix being two bedroom homes is not justified and no evidence has been produced to support this policy.

The development densities of sites proposed in countryside locations are excessive and in no way represent the locality.

#### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to increase the flexibility of the criteria based on site specific circumstances.

Comments where no change is considered necessary:

Affordable home products are dealt with in Policy H2.

Smaller homes (as measured by bedroom size) are already encouraged within the policy and are considered appropriate.

The proposed housing mix for development sites is underpinned by comprehensive evidence contained in the Council's "Specialist Housing Analysis". The proposed mix would not result in an overprovision of smaller properties when viewed over the plan period and in line with the projected changes in demographics.

The need for a specific housing mix has been considered with reference to relevant data. It is considered that the housing mix proposed by developers would represent property types that would generate the most profit. This may not be the same as the housing mix required to create a sustainable housing mix.

The density of proposed allocation reflects the desire of the Council to meet its housing need by ensuring the most efficient use of land to meet housing need. By making the most efficient use of land less development will be required in countryside areas.

## H4 - Housing for Older People, People with Specialist Medical Needs and Annexes

9 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for policy.

It should be made clear that "it is not intended that new provision should be limited to the sites identified in the Local Plan".

The Government have made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.

Annexes could be an innovative solution initially used for the younger family members needing a home and later for the older occupants as they downsize and would benefit from the younger family at hand to provide care. There is a shortage of this type of accommodation.

"Extra care housing in itself can include sheltered housing, care homes and nursing homes". HBRA feels that statement above in the draft Plan is not correct. Extra-care is housing that also provides personal care sometimes round the clock care. Sheltered is the older model of housing with an alarm system and a manager who may live on site but more often visits the scheme on a daily basis. Personal care is not provided by the scheme but can be purchased from a care provider.

As currently proposed, part (c) of this policy is unclear, and further clarification of what constitutes 'a locally identified need' would be beneficial. The provision of this type of housing should be to meet the needs of the Borough as whole and should not be restricted to a local area.

There should be a specific requirement for a developer to provide extra care housing for any development with over a specific number of units. This will enable mixed communities to be created in which older people can participate and be looked after.

There is no reference to the evidence base that supports the policy. The evidence base should account for current or future numbers of disabled people, their likely age breakdowns, housing needs and other vital demographic factors such as the predicted need for the provision of institutional style accommodation, extra-care housing, residential or nursing homes.

We would suggest that the second criterion should be amended as follows; "The location is appropriate, taking into account the accessibility of facilities, services and public transport, and the needs of older people" This adjustment would ensure that the policy can respond more precisely to proposals for 'extra care' developments, which often provide a wide-range of facilities (well in excess of those provided by traditional retirement-living schemes).

The language and understanding is very dated, not to mention quite insulting as it uses the very outdated medical model of disability rather than the prevailing social model.

The policy is discriminatory.

It is suggested that HBC invests, together with the NHS and HCC Social Services in care and nursing homes for the increasing, and increasingly ageing, population. Throughout the borough. Do not rely on the private sector.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- The policy should provide further clarity that new provision of housing for older people is not limited to sites identified in the local plan
- Sheltered housing should be considered as 'extra-care' housing
- Suggested wording amendments regarding definitions are appropriate

- The policy relating to annexes should be adjusted to support development of this type of accommodation for younger people

Comments where no changes are considered necessary:

It is considered that the policy addresses the housing requirements of groups with specific needs in combination with other policies within the draft plan.

It is considered that part c of the policy is sufficiently clear. Where there is a need for specialist housing in a local area planning permission will be supported where all other relevant policy requirements are also satisfied.

In order to ensure that there is not an over-provision of housing for older people in any specific area, it is considered that requiring extra care housing on any site over a certain threshold is not appropriate.

Havant Borough Council, along with other organisations such as the NHS and Hampshire County Council work together to provide care and nursing provisions for the ageing population. The policy does not restrict any form of non-private care provision.

## H5 - Gypsies, Travellers and Travelling Showpeople

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Policy of meeting identified need is welcomed.

Unmet need in neighbouring authorities should be acknowledged as an 'identified need' within the terms of policy H5, allowing a permissive approach to be taken towards any sites that may come forward and which meet the requirements of policy H5.

Paragraph 10 of Planning Policy for Traveller Sites sets out national guidance and requires that criteria based policies should be set to guide decisions "where there is no identified need." Thus the first criterion to policy H5 which requires a need to be established before favourable consideration can be given to a Traveller site is unacceptable in its present form. Either the first criterion should be removed, or a separate policy should be added to deal with the criteria to be applied where no overriding need exists.

Concern that Policy H5 is unsound.

Policy fails to meet requirements of the NPPF and Planning Policy for Traveller Sites.

No site is identified and therefore the draft Local Plan 2036 fails to meet the requirement to identify land to meet the need in the first five years.

Other policies within the draft Local Plan 2036 such as E10 (Landscape and Townscape) should be applied in the selection of a site for allocation.

Existing unauthorised site would fail to meet the test of soundness as it is not consistent with Government policy.

Requirement for local connection in Para 6.57 is contrary to the Government's Planning Policy on Traveller Sites (paragraphs 11 and 24[e]) and conflict with the Duty to Cooperate by preventing traveller needs from being met where they cannot be accommodated an adjoining authority.

We would welcome an additional criterion in Policy H5 requiring development to accommodate gypsies, travellers and travelling showpeople not to have any adverse effects on the significance of heritage assets, as part of the positive strategy for the conservation and enjoyment of, and a clear strategy for enhancing, the historic environment as required by the NPPF.

### HBCs proposed way forward for Regulation 19 HBLP2036

The policy will need substantial revision for the Regulation 19 HBLP2036. Permission for a single pitch on Long Copse lane was granted on appeal (APP/X1735/W/3156978). This will need to be reflected in the policy in the Regulation 19 HBLP2036. Unmet need from neighbouring authorities needs to be considered further as well as compliance with national policy.

Comments where no changes are considered necessary:

- It is not considered necessary to reference the historic environment in the policy, unless any allocation could directly impact on a specific heritage asset.

## H6 - Land north of Long Copse Lane

23 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Objections to the site being developed for housing and requests to remove the site from the HBLP 2036.

There are sequentially preferable sites which should be allocated for development to meet housing need instead of H6.

The other sites proposed in Emsworth are considered to have a greater capacity for housing delivery than indicated in the plan. The removal of H6 would not impact on the proposed housing numbers if the densities of other sites were increased.

**Representations regarding discounted SHLAA sites in Emsworth can be found in the summary table entitled "Evidence Base - SHLAA".**

Redlands Grange has not been shown on the map.

Request that affordable housing is provided on site.

Suggestion to lower the site capacity to 10 dwellings.

Suggestion that the proposed number of homes is reallocated to Southleigh (KS5).

Suggestion that the development is coordinated and phased/staggered.

Suggestion that the development is off set from Long Copse Lane via open areas for paths and drainage.

It is strongly recommended that a prospective developer undertakes a minerals assessment and contact a local minerals operator to allow for mineral related opportunities to be fully explored with HCC.

Support for the site being developed for housing.

The principle of agreeing an overall master plan is accepted by the landowners; the suggestion that development will come forward in phases is also welcomed.

An initial master plan demonstrates that 260 dwellings can be accommodated within a design concept that is based on ecological buffers and swathes of open space running through the site.

The site naturally falls into two zones; west and east of the track leading to the Old Dairy Farm. While it would be appropriate to work within a master plan for the whole allocation so that it is planned comprehensively, there is no reason that these two sections cannot come forward under separate planning application phases. They have separate access points and can be developed separately under an approved master plan concept.

Additional land to the north-west of the site has become available that will enable a more comprehensive scheme; no additional dwelling numbers are proposed, instead it will improve the overall scope for landscape buffering and open space provision. It is requested that the site area is adjusted accordingly (plans submitted).

### **LOCAL GAPS & LANDSCAPE:**

Development will transform one of the most rural and beautiful areas into one of the most highly developed; therefore, altering the character of the area.

The site is outside of the urban area (Policies AL2 and CS17 of the Adopted Local Plan) forming a strategic green gap; development will lead to urban sprawl and set a precedent for further development in the area.

The promotion of sites in unsustainable countryside locations whitewashes existing Local Plan policies to safeguard and enjoy the countryside.

The proposed density does not represent the countryside/semi-rural location.

The site is in a semi-rural area, effectively in the countryside and, in accordance with the NPPF, '*conserving and enhancing the natural environment*', development should not take place.

The site forms part of the local gap between Emsworth and Westbourne, as well as a buffer to the South Downs National Park.

The site forms part of Landscape Character Area 21 (Southleigh Forest) in the Landscape Character Assessment Sensitivity Report 2007, more specifically, sub-areas 21.3 and 21.4:

- **21.3 (Hollybank Woods)** has a Low Capacity for development because of high landscape sensitivity; development would have a negative impact on landscape/visual and settlement characteristics.
- **21.4 (West and South of Hollybank Woods)** has a Medium/Low Capacity for development as development would encroach on the river valley landscape, have a negative impact on visual characteristics.

Development would conflict with Policies E2 (Green Infrastructure) and E10 (Landscape and Townscape).

#### **HERITAGE:**

The site is adjacent to Redlands Lane which forms part of the Ancient Sussex Border Path.

The site is in the setting of the Grade II Listed Hollybank House; development would conflict with Policy E9 and Paragraph 133 of the NPPF.

The agent has stated that the setting of the listed buildings on adjacent land will be protected through the appropriate arrangement of buildings, open space and landscaping.

#### **BIODIVERSITY & OPEN SPACE:**

This is a highly constrained greenfield site consisting of countryside, trees, hedgerows and close to ancient woodland. Development would result in the loss of open spaces, natural habitats, access to the countryside and would also prevent the ability of the natural environment to mitigate against pollution.

Concern over the impact of noise and air pollution on biodiversity.

The agent has stated that the adjacent woodland will be protected by an appropriate buffer and that the TPOs will be incorporated into the layout of the site.

The site is covered by many Tree Preservation Orders (TPOs).

The agent has stated that the trees (which do not have TPOs) and hedgerows within the site will be retained for the most part.

There are high quality hedgerows on and surrounding the site.

The agent has stated that:

- The species' existence, along with the requirements of buffers and bat corridors, around the site is recognised
- The wooded copse will be retained as habitat to support the maternity roost; new woodland and foraging areas are proposed to connect the bat areas

A Bechstein's bat maternity roost is within the vicinity of the site; there is little evidence of successful mitigation, as such, the development would conflict with proposed policy E19 (Protected Species).

Recommendation that detailed surveys are carried out to ascertain the status of Bechstein's bat in the area.

There is potential for badgers, dormice, birds and reptiles to be on or immediately surrounding the site.

Hollybank Wood is a SINC and should be protected.

Support for the additional parcels of land since the site identification in the Local Plan Housing Statement; this will help provide greater scope for green infrastructure, especially the proposed primary bat corridor down the eastern edge.

Positive comments regarding the open space provided on the Redlands Grange development.

It is requested that the site is made into a community green space.

The landowners of former site UE39 (now encompassed within H6) state that Policy E2 would not apply to their parcel of land as they could only accommodate 25 dwellings.

#### **SURFACE WATER FLOODING & DRAINAGE:**

Concern that Water Authorities do not tend to adopt Sustainable Urban Drainage Systems (SuDS).

Concern development would create greater flooding problems in the area and downstream.

Concern development would affect water quality.

There are known surface water drainage and groundwater flooding issues in the area, including along:

- Long Copse Lane (comments that surface water flooding has increased since the Redlands Grange development was built);
- Redlands Grange (despite incorporation of SuDS), and;
- Oak Tree Drive.

The main sewer feeds into a junction by the garages along Long Copse Lane (Culvert No 7752).

Suggestion for a surface water runoff and sewer plan, along with a new sewer connection with an east-to-west flow and the capturing of rainfall onsite.

The policy requirement to reduce surface water runoff is supported. It is suggested that managing flood risk at its source (i.e. on site) is the most appropriate risk management technique and that contributing to a flood alleviation scheme should be supplementary rather than an alternative.

The site is in Flood Zone 1; the agent has stated that the master plan will be informed by a surface water drainage strategy that incorporates SuDS at the lower parts of the site and connects to the surrounding drains at greenfield discharge rates.

#### **INFRASTRUCTURE:**

The policy does not include early years or related infrastructure.

The hospital and local schools are at full capacity and are unable to handle the estimated number of people from sites H6 and H14.

There is a lack of suitable and sustainable infrastructure to support the level of development.

The site is relatively isolated:

- The nearest community infrastructure is in Westbourne.
- The nearest bus stop is a 15-minute walk away.
- The above will lead to greater car usage.

The proposed convenience store is:

- Not realistic, justified or viable as local provision is more than adequate.
- The existing retail hierarchy is mature; quantum spend and catchment analysis does not warrant additional retail development.
- Would impact on the area due to delivery lorries.

Objection to the criterion regarding a new convenience store and request for its removal from the policy.

#### **ACCESS, TRAFFIC & ROAD SAFETY:**

Comments that access to the site is dangerous as the narrow, right-angled, blind bend from Hollybank Lane to Long Copse Lane, as well as Long Copse Lane being a single-track country road, is used by walkers (including school children), cyclists and equestrians.

The site's proximity to Redlands Lane will also create dangers for drivers, walkers and cyclists using this route.

Construction vehicles were stuck at the top of Hollybank Lane during the Oak Tree Drive development.

Improvements to the right-angle bend will require third party land.

Suggestion for an off-road access to Hollybank Woods for walkers, cyclists and equestrians to be provided.

Suggestion for a roundabout where Long Copse Lane and Wraysbury Park Road meet.

Support for road widening providing that drainage ditches are included within the site.

Objection to road widening as;

- Residents along Long Copse Lane could lose part of their driveways; reducing ability to park off-road;
- This would destroy trees and hedgerows (this conflicts with Policy E15), and;
- This would alter the character of the lane.

The junction layout of Long Copse Lane with North Street (Westbourne) falls short of the requisite highway standards.

Highway infrastructure to support development of the scale proposed would require highway corridors of a minimum 5.5m carriageway with a minimum 1.8m footway to at least one kerb line; this is not achievable.

There are no suitable and realistic means of controlling traffic movements to mitigate any highway safety risks; this would bring complications in providing appropriate turning areas and associated traffic movements.

The agent has stated that a sensitive scheme can be achieved for widening of Long Copse Lane in places that protects the existing character.

Local roads (especially Long Copse Lane) would not be able to cope with the additional traffic generated from this development during and after construction.

It is requested that an overflow car park for residents is created during the construction phase.

The agent has stated that access is proposed from Long Copse Lane and will utilise two vehicular accesses.

#### **RIGHTS OF WAY NETWORK:**

Suggestions of pedestrian paths and nature trails being incorporated into the site.

It is requested that the development provides a multi-user link to Havant BOAT 66a, a multi-user route across the site, along with a pedestrian link/crossing from the site to Havant Footpath 67 (southern side of Long Copse Lane).

It is requested that a developer contribution is paid to HCC towards enhancing the local rights of way network.

#### **HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to include:

- An amendment to the site boundary to incorporate the newly submitted parcel of land to provide greater provisions of open space and landscape buffering
- A requirement that a multi-user route across the site is provided which connects with Havant BOAT 66a and Havant Footpath 67
- A requirement that a contribution is paid towards the enhancing the local rights of way network in line with HCC's request
- An additional point in the site opportunities and constraints that road widening, in places, may be subject to third party arrangements
- An additional point in the site opportunities and constraints that the site is within a sensitive landscape location as outlined by the Landscape Capacity Study (May 2015)

- The deletion of criterion f) (convenience store)
- An amendment to criterion j) to state that development provides a drainage solution onsite and that a contribution is supplementary rather than an alternative
- Amendments to the policy following the completion of the SFRA Phase II

**The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:**

- Green Infrastructure (E2)
- High Quality Design (E6)
- High Quality New Homes (E7)
- Historic Environment and Heritage Assets (E9)
- Managing Flood Risk in New Development (E12)
- Drainage Infrastructure in New Development (E13) including a requirement for development to connect to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water
- Ecological Conservation (E15) regarding trees, hedgerows and SINCs
- Protected Species (E18) regarding Bechstein's bat
- Affordable Housing (H2)
- Housing Density and Mix (H3)

**Comments where no change is considered necessary:**

**General:**

- **Density and other sites in Emsworth** - A consistent methodology has been used to calculate the potential site capacity for each site proposed for development in the Draft HBLP 2036. This has taken into consideration the constraints and setting of specific sites where appropriate. For this site, a relatively large proportion of the land will be needed for open space and mitigation for Bechstein's bat.
- **Coordination of development** - The site could be brought forward in phases, providing that a master plan was granted outline permission, as explained in paragraph 6.61.
- **Minerals** - The site's location in the Mineral Safeguarding Area (MSA) has been highlighted in the site opportunities and constraints and a requirement has been included (criterion h) which states that opportunities for prior extraction are explored with Hampshire County Council (Lead Minerals Authority).

**Local Gaps and Landscape:**

The PUSH Spatial Position Statement supports strategic countryside gaps, but it is not considered that any gaps of 'sub-regional significance', nor of 'fundamental local importance' exist in the Borough, which would outweigh the need for housing. It is acknowledged that undeveloped gaps were protected by policies in the adopted Local Plan. However, in the new HBLP2036 it is no longer possible to continue this protection, as there are not enough brownfield sites and sites within the existing urban area to meet the Borough's housing need. Therefore, greenfield sites outside of the existing urban area have had to be considered for development. With this, proposed Policy E10, aims to prevent the coalescence of distinct settlements where possible.

The Havant Landscape Capacity Study (May 2015) has been used, along with all other evidence available and submitted, to assess whether the site should be allocated. It is acknowledged that H6 is located within areas which were assessed as having low and/or medium capacity to accept change in the Landscape Study and that the study recommends that parcels 21.3 and 21.4 are not taken forward for potential growth. The findings of the landscape study are one consideration of many in the planning balance as to whether

development should be supported. The Council considers that development may be deemed acceptable where mitigation could be provided for the identified impacts on landscape character.

### **Heritage:**

The site's proximity to Hollybank House and Redlands Lane (Ancient Sussex Border Path) has been highlighted in the site opportunities and constraints; a requirement to preserve and, where possible, enhance the character and setting of the former is specified under criterion kb) of the proposed allocation policy. In addition, any future application would have to demonstrate how it would meet the requirements of proposed Policy E9 (Historic Environment and Heritage Assets).

### **Biodiversity & Open Space:**

The existence of Bechstein's bat, and other documented species above, has been highlighted in the site opportunities and constraints. The proposed policy outlines a requirement that any future proposal must include appropriate mitigation measures, including buffers, in line with proposed Policy E18 (Protected Species). In addition to this, the protected trees and high-quality hedgerows have been highlighted in the site opportunities and constraints along with design and layout requirements to retain and integrate them into any future scheme (criteria kc and kd).

Comments that proposed Policy E2 (Green Infrastructure) would not apply to smaller sections of H6 are not supported by the Council. It is important to stress that the Council no longer views H6 as a combination of separate landownerships but as one comprehensive site. The Council has made it clear that a comprehensive master plan of the whole site (H6) is essential to consider the site's constraints, context and landscape character. As such, an outline application would need to be approved for the whole site (H6), which includes adequate open space provision, so that phased development can come forward in accordance with the master plan in the form of reserved matters applications.

Regarding the fact that H6 is a greenfield site, the Council has considered sites across the Borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations. The Council cannot designate the site as a local/community green space as it is an extensive tract of land (please see paragraph 77 of the NPPF). However, the established network of natural habitats in the Borough will be outlined as part of the review on the Havant Borough Biodiversity Action Plan (BAP); this will be available in due course and will inform the proposed site allocations for the Pre-Submission Local Plan 2036.

### **Infrastructure:**

The current and future capacity of local schools, health facilities, public transport and early years infrastructure have been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP).

### **Access, Traffic and Road Safety:**

The construction impact of the development will be managed, as far as is possible within the limits of regulations.

The Borough-wide Transport Assessment (TA) is currently underway and will be available in due course. The TA will assess the impacts of all development proposed in the Draft HBLP 2036 on the highways network and establish what mitigations measures are needed. In addition, the proposed allocation policy states that an applicant will need to supply a Transport Assessment and Travel Plan for the site to support any future planning application. The Council will work with Hampshire County Council (as lead Highway Authority) to assess the impact road widening and the development (as a whole) on factors such as; the landscape, road safety and existing resident amenity. This will be dealt with at the application stage when greater details are known about road and pavement widths etc.

## H7 - Land at Selangor Avenue

6 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Object to the infilling of an important green gap which separates Emsworth from Havant and contributes to the rural setting of the AONB.

Object to revised planning application currently being considered (including objection to reduction in number of dwellings compared to the 2017 resolution to grant permission).

In combination with proposals for Southleigh (KS5), development here will deprive the area of Green Space.

Public transport services are limited.

Support the allocation.

Concern about increase in traffic and parking in surrounding roads.

Concern about surface water drainage; roads already flood.

Proposal will affect well being and quality of life of existing residents.

There is a permissive route from Havant Road down to Havant Footpath 56, which is part of Wayfarers Way / Solent Way. A Definitive Map Modification Order (DMMO) claim has been placed on this route and is awaiting investigation. Should development come forward on this site, HCC request that a developer contribution be provided towards surfacing this route, should it be made into a right of way.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. There is resolution to grant planning permission, demonstrating that development of this site is deemed acceptable by the Local Planning Authority. Proceed with policy as proposed in the regulation 18 draft, or remove policy of development commenced in the meantime. If scheme does not proceed to implementation, review the need to make any amendments to the policy.

A number of respondents consider that the developer should not be allowed to revise a scheme already subject to a resolution to grant planning permission. This view is noted, but the council is obliged to consider amendments to schemes before permission is granted or new applications on land already subject to planning permission.

## H9 - Land west of Coldharbour Farm

4 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for the continued allocation of the site for 53 dwellings.

It is the intention of the developer to submit an application and commence development of the site before the HBLP 2036 is anticipated for adoption.

Criterion a) is considered appropriate.

Criterion b) should be deleted as Hampshire County Council (HCC) raised no objections to the previous application (APP/14/00360) which stated that due to the site's limited size prior extraction of the underlying mineral resource would not be viable.

Criterion c) requires clarification as to whether the contribution towards a flood alleviation scheme will be secured via the Community Infrastructure Levy (CIL).

Criterion eb) should be deleted as on-site allotments in addition to private and other public open space would exceed the relevant standard.

Criterion ec) is dependent on securing third party land outside of the applicant's control. Suggestion that the requirement is amended to provide a safe pedestrian and cycle link to the boundary of land under the applicant's control.

The outline planning permission (APP/14/00360) has now expired and although a rearrangement of the parking layout was approved in August 2016 (APP/16/00496), no further activities have been progressed to suggest that the site is likely to come forward quickly.

No early years or related infrastructure has been included.

Suggestion that Havant Footpath 71 (adjacent to eastern boundary) is upgraded to a multi-user route with a similar connection between the footpath and Southleigh (KS5).

The policy requirement to reduce surface water runoff is supported. It is suggested that managing flood risk at its source (i.e. on site) is the most appropriate risk management technique and that contributing to a flood alleviation scheme should be supplementary rather than an alternative.

Given the proportion of the site that is at risk of flooding, the consideration of climate change impacts should be fully assessed. Proposed development should be accommodated without locating buildings, structures or drainage infrastructure within areas at risk of flooding.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to include:

- An amendment to criterion c) to state that development provides a drainage solution onsite and that a contribution is supplementary rather than an alternative
- Amendments to the policy following the completion of the SFRA Phase II
- A design and layout requirement to upgrade the existing Havant Footpath 71 to a multi-user route and provide a multi-user link from the footpath to Southleigh (KS5) (either by the developer or via a developer contribution)
- That criterion ec) (right of way linking to the service station) is subject to third party arrangements

Further investigation is also required to ascertain whether HCC would agree with the suggestion to remove criterion b) (mineral extraction).

Comments where no change is considered necessary:

- Any flood alleviation contribution would be secured through a S106 agreement.
- In line with Policy E2 and E19, community food growing provisions would need to be provided as part of the public open space provision rather than in addition to it. Therefore, criterion eb) does not exceed the relevant standard.
- The capacity and future growth of early years infrastructure has been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP).

## H10 - Land at Westwood Close

154 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Principle of development

Support for the principle of development and identification of the site as both 'deliverable' and 'developable'.

The Draft Local Plan proposes more housing than is needed. This site should be rejected.

Together with other nearby recent and proposed developments, it'll be too much.

Emsworth has made a significant contribution to housing provision in the Borough already.

This amount of homes would not make a dent in the housing target

This development would not be affordable.

The site is protected green land that is nor earmarked for development in the Government's current proposals.

Why can't the 49 homes be built in Havant Town Centre, over shops to encourage footfall?

If development continues at this pace, there will be one conurbation from well west of Havant to Chichester.

There is insufficient need to justify this development.

The last set of housing supply figures omitted any allowance for windfall sites.

The Housing Statement sets out strategic sites to meet housing need. This site was not included.

The shape, size and residential yield of the site questions the need and justification for it.

The NPPF must be taken into account and statements in the framework highlight the site should not be developed.

The housing numbers lost through the deletion of this site could be regained through increasing density on the Southleigh strategic site and urban sites close to the town centres and Victoria Cottage Hospital and Gas Holder site. This is a more sustainable and strategic approach than using sensitive greenfield sites at the edge of the urban area.

Site is noted as 0.97ha - the developable land is larger than this and so the yield of the site is more than 35 and approximately 49.

#### Flood risk general

It is likely that climate change would be a key consideration in assessing the suitability of this site for development, upon which there is no information currently available. Given the uncertainty, we would suggest that more information is required before it can be demonstrated that this site can be allocated, to ensure that there is no increase in flood risk to new or existing development.

Nearby residents could sue Havant Borough Council if flooding takes place.

New homes would be damp.

The tests showed a low water table but tests were done in October.

Previous boreholes show a high water table/ High level of the water table makes this area waterlogged, particularly in the winter months.

Site was rejected in 2013 due to flood risk and nothing has changed since then.

Climate change will increase the flood zones and lead to higher rainfall, exacerbating flood risk

Does not comply with NPPF in relation to not increasing flood risk elsewhere.

Environment Agency may have a model which allows testing of impact of climate change.

Would lead to pollution into the river.

Any application Flood Risk Assessment (FRA) should look at hydrological impacts on surrounding properties.
Application FRA should be subject to expert scrutiny by HBC.
Housing should not be built in the floodplain.
We would only need a 1 in 100 year storm or heavy rainfall for there to be flooding - floods in 1994 hit the national media.
The risk of flooding in Emsworth will be greater if this site is developed.
Do not believe the developer understands the complexity of the water table
Footpath 73/Sussex Border Path has flooded in the past, making it impassable.
The site has previously been discounted in the Strategic Housing Land Availability Assessment on the basis of flood risk.
<b>Fluvial flood risk</b>
The site lies directly adjacent to (and partially within) an area of Flood Zone 2 & 3. Properties adjacent to the River Ems have had a long history of flooding. This has driven a study currently being undertaken by the Environment Agency to establish a better understanding of flood risk from the River Ems. This study is likely to change our understanding of the extent of the floodplain and as a result indicate areas where the storage of flood water may be desirable.
It is part of the River Ems floodplain.
Removal of floodplain area would affect nearby properties and those further north in Emsworth.
The land is designated as zones 1, 2 and 3 for flooding.
Blockage of bridge close by could lead to further flood risk upstream, including on the site.
There may not be flooding in the field, but there would be further downstream.
The River Ems has flooded this land when it has been in spate.
In surveys in 2013, the land was classified as flood zone 3.
If the development is built and flood risk is increased downstream, will be seeking recompense from Havant Borough Council for damages caused.
Noted that the highest recorded level of River Ems is 1.04m, however it is stated that once the level reaches 0.80m there would be a possibility of flooding
Whilst the site is in flood zone 1, it borders flood zone 3 and so there is significant potential for flood risk to such a vulnerable site.
The improved southward flow and new sluice gates at Lumley mean that this site is sandwiched into a mini flood plain.
If the river flow is held at Constant Springs even temporarily then the water will back up into this field and potentially into properties.
Environment Agency flood zones do not take into account climate change. EA recommend an increase of between 45% and 105% in river flow over 100 years.
The site suffers from high groundwater levels and sub-surface run-off water, this means there is a greater risk of flooding than its zone 1 status suggests.
Unlikely that the new homes could get house insurance as they would be too close to the River Ems.
The site boundary abuts the extent of flood zone 1. However flood zones are regularly reviewed and subject to change due to climate change increase.
The site is adjacent to a stream corridor and a zone of high flood risk probability.

Suggested wording to criteria c to remove unwanted trade-off as it could infer that a contribution towards flood alleviation could be sought in lieu of provision of a surface water run off solution.
Highlights the Emworth Flood Risk Strategy's aim to make the most of opportunities to reduce flood risk in the future.
The site sits above a secondary aquifer and is prone to flooding every winter.
<b>Surface water flood risk</b>
Field is a depression so it is a natural soakaway.
New residents would experience waterlogged gardens.
What will be done to manage water that soaks off in the field to the stream?
The site is a water meadow and so for much of the year it is a bog.
There have been problems involved in the Redlands Grange/Hampshire Farm development for flooding and drainage - land is waterlogged despite the holding pond.
Surface water already backs up along Westwood Close.
The area has historic drainage capacity issues.
SuDS success depends on contractors' competence and the avoidance of performance defects, which sometimes happens.
SuDS success reliant on regular maintenance and monitoring. Significant concerns how regular servicing would be guaranteed on unadopted roads.
<b>Geological stability</b>
Soil is silt and London Clay - not sufficiently stable to build houses.
Field is a depression.
<b>Public right of way</b>
The diverted route would need to overcome any flooding/drainage concerns, be surfaced to HCC Countryside Service design standards and a commuted sum provided for its future maintenance. In addition, HCC request that a developer contribution is provided towards enhancing Footpath 73.
The Sussex border path has existed since the middle ages - surely this route should be sacrosanct.
Footpath 73 popular. Moving it to the east would make it impassable in winter. Would contradict NPPF requirements regarding rights of way.
Moving the footpath closer to the river will make it impassable during the winter as it will be waterlogged.
Making the footpath unusable in the winter months is unacceptable when people are recognising the need to exercise more.
Although the plan is to re-route the path, the whole place will change and urbanise.
When there is snow, this can be the only safe route into Emsworth.
Ems Valley is an important green corridor linking Chichester Harbour with the South Downs - further development would diminish the essence of this green corridor.
Concern regarding the impact physical health due to the impact on the Sussex Border Path. Do not take away one of the only remaining spaces for healthy, outdoor fitness in Emsworth, forcing people into a car to find open space.
The proposal for H10 seems to be in complete conflict with paragraph 5.13. The green space with the Sussex Border Footpath running through it is very important to people's wellbeing. I think your policy should acknowledge concern/ statistical information about the increasing incidence of people developing mental health problems.

Local residents have been able to walk unhindered on the site for 20+ years without having to stick to the footpath.
Nearby homes have had rear access onto the site for 20+ years. This could be formalised as a prescriptive easement in accordance with land registry procedure.
Diversion of the path would destroy the site's amenity value.
<b>Landscape, gaps, open space and tranquillity</b>
Development would remove an undeveloped peaceful and tranquil area.
The field are a green belt site - there must be plenty of brown sites that could be used instead.
The field is a public amenity - will lose one of few country walks left in Emsworth.
Field forms a natural green corridor or gap between Emsworth and Westbourne/Hampshire and West Sussex.
Green areas around Emsworth are rapidly disappearing.
Important view of Westbourne Church would be removed.
Should be designated as the Sussex Border Path Local Green Space.
Will impact on village look and feel.
Site is close to Chichester Harbour AONB.
Chichester District Council are identifying the land opposite as an area of natural beauty - why are HBC not doing the same?
Will change the character of the area and effectively join Emsworth and Westborne.
This is a historical area.
Please stop this beautiful countryside being destroyed!
Our children also need to grow up in a village and town where they understand the importance of retaining green spaces.
Fulfils no other purpose than destroying another piece of countryside
Recent adopted Land Use Designations state that the field is Open Land and is a Heritage Environment.
The site is currently a safe, natural playground for children to make dens, climb trees and be in a natural area.
The field is beautiful with the buttercups in full flower.
With mental health issues increasing, we all need the natural environment to remain as unspoilt as possible.
Westbourne cannot afford to lose this wonderful amenity.
The Ems Valley is an historic County boundary between Hampshire and West Sussex.
If development is permitted, the remaining area closer to the River Ems should be designated as a Local Green Space.
Landscape Character Assessment highlights the area as having medium to low capacity for change due to encroachment on the river valley landscape, erosion of the gap. The study concludes by saying that no part of this area is taken forward for development due to its open landscape being particularly sensitive part of the pasture landscape to the Forest of Bere and River Ems.
<b>Local green space</b>
The development site should be identified as a Local Green Space.
<b>Transport, parking and access</b>
Westwood Close too narrow and unsuitable for traffic growth.

People would have to drive to get to Emsworth Town Centre.
Site couldn't be accessed by delivery vans/emergency vehicles.
Westwood Close would be unsuitable for HGVs if minerals had to be extracted prior to development.
Would be a significant increase in traffic near the site.
The extra traffic will generate noise and pollution
The road infrastructure cannot cope with another 49 houses
There has been a huge impact on traffic nearby from Redlands Grange/Hampshire Farm
Increase in traffic will make queues inevitable.
Vehicle movements in and an out of the site will be in excess of 200 a day.
There is inadequate parking already on nearby streets.
The proposed access is unacceptable. Westwood Close is already suffering from additional car movements from Redlands Grange.
Used to having children play in the street as it is a quiet cul-de-sac. Concerned that a child could be run over.
How is it intended to have this area policed? Hampshire Farm/Redlands Grange has led to an increase in anti-social behaviour and crime.
Concerns regarding highway safety following several incidents and near misses in the vicinity.
The proposed site plan shows an access road with no footpath at the site entrance - this is not acceptable.
<b>Ecology</b>
Has high ecological value for many different species.
Are more common species not important?
Could interfere with Environment Agency project to get migratory fish back into River Ems.
Site used by Bechstein's Bat - maternity roost likely to be present.
Birds of Prey use the area.
The development would lead to a loss of wildlife.
We are out of touch with nature in this modern world and we will all lose out by concreting over wild spaces.
The fields here are unique being unmanaged grazing with no disturbance from agriculture. This attracts many species of birds, mammals and invertebrates.
Site is part of a wildlife corridor from Thorney Island to the South Downs
This is the eastern extent of Salmon being found in any river - if development goes ahead this species will be lost.
Understand the need for more housing but not to the detriment of the local environment.
Brook Meadow is a designated Site of Importance for Nature Conservation (SINC).
River Ems contains an important population of Water Voles.
Retention of hedgerows would be preferable to the use of fencing to preserve ecological value.
The 'gap' provides a corridor for free movement of wildlife.
The site contains oak trees that have existed for 200+ years.
Part of the Westbourne Chalk Streams to Compton Biodiversity Opportunity Area.
<b>Agricultural land</b>

It is an important remaining area of farmland.
<b>Site specific constraints and matters</b>
The number of homes proposed is excessive.
Value of adjacent properties would be significantly reduced.
Will impact on quality of life.
Clarification sought on the site area being considered.
The scheme presented has no aesthetic value, designed to maximise profit. At odds with Policy E6.
Westwood Close residents would experience increased noise, disturbance and headlights shining into homes.
Low traffic volumes and lack of through-routes attracted people to live in Westwood Close.
Westwood close residents would suffer loss of privacy, noise, outlook and overlooking.
Only gain is a good financial profit for the developer.
Scheme is a commercial exercise which overrides the wishes and needs of the local and wider community
The proposal by the developer is 25% more homes than the draft Local Plan, this would be overdevelopment.
Support for criteria a, b and di-ii.
Point d,iii should not impose prescriptive limitations on the design and layout relating to tree retention in the absence of a detailed aboricultural assessment, which could be provided with a planning application. The Local Plan should not be prescriptive about limitations on the site. Removal or rewording suggested.
<b>Infrastructure</b>
Concern over impact on infrastructure, particularly primary care, hospitals and education.
There is a main sewer in the field.
There are no extra schools and shops planned.
What will be done regarding the sewage? Old, overloaded pipework already struggles.
Emsworth's infrastructure is bursting at the seams.
<b>Affordability</b>
The development will be out of the price range of young people who need affordable housing
<b>Construction impact</b>
There will be noise, traffic and mud during the construction phase.
<b>Residential amenity</b>
Westwood Close would be the access road. This would take away privacy, peace and quiet - the reason for living in the road.
Properties on Westbourne Avenue have all had back access over this land since they were built. This should not be taken away.
Currently enjoy a tranquil and rural outlook and this would be ruined by the proposed urban sprawl.
Will affect residents outlook towards Westbourne and Westbourne Avenue will be overlooked as well as rear gardens.
Proposed houses would be cramped.
<b>Neighbourhood plans and impact on Westbourne</b>

The proposed allocation is inconsistent with the near complete Neighbourhood Plan for Westbourne. Once complete, this would form part of the statutory development plan for this area. The area of the Ems Valley in West Sussex is designated in the Neighbourhood Plan as a Local Gap.

Draft Emsworth Neighbourhood Plan Policy L5 states *"Housing development proposals of a non-strategic nature will only be permitted if they do not impinge on the current gaps between Emsworth and its neighbouring settlements, nor encroach on the protected landscape area to the north-east or the waterfront area to the south"* and also states *"Protecting green gaps between settlements will retain the landscape quality with benefits to wildlife, leisure, recreation and mental wellbeing"*.

The artificial administrative boundary is used cynically to push development right to the boundary without consideration of the community that live the other side of the 'line'.

#### **Windfall sites**

Seems that the site may have been construed as a windfall site. Windfall sites by definition is normally previously developed land which is not applicable in this case. This is not brownfield land.

#### **HBCs proposed way forward for Regulation 19 HBLP2036**

The Council is aware of the site constraints but has had to consider the site allocation given the high housing need. Nevertheless, the Council will further consider the suitability of the site for development, particularly regarding flood risk. The Council will work closely with the Environment Agency to improve the evidence base and make any necessary changes to the policy approach.

The Draft Local Plan indicates there are sufficient sites to accommodate the need for housing together with a reasonable buffer. This would not change if this site (and others where the principle of residential development is being further considered) is not allocated. On this basis, it is appropriate to further consider the principle of residential development on this site after the relevant discussions with statutory stakeholders has taken place.

Notwithstanding the above, if the allocation is to still proceed in the future, consider whether the policy should be amended to:

- Acknowledge underlying clay / poor permeability in site opportunities and constraints and include a requirement for a geological study and/or drainage strategy
- Be more flexible regarding the incorporation of trees into the design.

Whilst the need to reroute Footpath 73/the Sussex Border Path is not in itself a reason to restrict development. However the policy could be amended to stipulate that the diversion should be to the east of the development's built form to maintain the rural character of the route and the view to Westbourne. It could also be stipulated that the design and construction of the rerouted route prevent waterlogging during the winter, for example by making it a boardwalk at this point.

The presence of a main sewer will be further investigated and, if necessary, incorporated into any allocation.

The suggestion that the site be designated as a Local Green Space is addressed in the relevant policy (E4).

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- IN1 - Effective Provision of Infrastructure
- IN2 - Improving Transport Infrastructure
- IN3 - Transport and Parking in New Development
- E6 - High Quality Design
- E7 - High Quality New Homes
- E10 - Landscape and Townscape, regarding the separate identity of settlements
- E12 - Managing Flood Risk in New Development
- E13 - Drainage Infrastructure in New Development

- E15 - Ecological Conservation
- E18 - Protected Species, regarding Bechstein's bat
- E19 - Best and Most Versatile Agricultural Land
- E22 - Aquifer Source Protection Zones
- H2 - Affordable Housing

Comments where no change is considered necessary:

- The need for housing is Borough wide. As such, the Council must carefully look at all sites that could be suitable for development and cannot thus cap the amount of development to take place in Emsworth. Government is clear on the need to significantly boost the supply of housing and everywhere must play its part.
- The Council is already proposing significant development in Havant Town Centre and other key brownfield sites. This will accommodate a great deal of the Borough's housing need but these sites cannot meet the need for housing alone.
- Whilst the Environment Agency are reviewing this as part of the study into the River Ems catchment, the site is currently in flood zone 1.
- The fact that existing properties currently have rear access onto the site is not a matter for the Local Plan
- When considering which greenfield sites are suitable for allocation, the council has sought to prioritise sites of a lower agricultural quality. However, the available evidence is that the majority of land in the borough is of the best and most versatile quality (BMV). Therefore, the allocation of housing sites on BMV is unavoidable if the borough is to meet its housing need. In order offset the loss of BMV, the policy identifies a need for the development to include community growing provisions such as allotments as part of the open space provision.
- The PUSH Spatial Position Statement supports strategic countryside gaps, but it is not considered that any gaps of 'sub-regional significance', nor of 'fundamental local importance' exist in the Borough, which would outweigh the need for housing.
- There is no green belt in Havant Borough.
- Whilst the site clearly has ecological value, this can be preserved and potentially added to through development.
- It is accepted that Westwood Close currently serves only a handful of properties and is a cul-de-sac. Whilst the latter point would not change through development, the road would inevitably become far busier and the tranquillity of the Close would change which could affect, for example, the ability for children to use the street for play. Whilst this is of course regrettable, it would not in itself result in an unacceptable impact on highway capacity or safety and be a reason to restrict development.
- Any impact on property prices is not a material planning consideration.
- The proposed site is not within the area of the Westbourne Neighbourhood Plan.
- The Emsworth Neighbourhood Plan is not yet made and would need to be in line with the Local Plan.

## H11 - North Street Gas Site

2 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

No immediate comment - will wait to see details of any proposed development.

The site can deliver more than 15 dwellings.

The requirement of the policy to reduce surface water runoff is welcomed. Suggest the most appropriate way of managing flood risk is at source, i.e. on site, and that contributing to a flood alleviation scheme should be supplementary rather than alternative method of risk management.

Climate change would likely be a key consideration in assessing the suitability of this site for development, upon which there is no information currently available. More information is required to demonstrate that the allocation of this site is appropriate and that the proposed level of development can safely be achieved.

This development will generate additional footfall on Havant Footpath 72 to the north of the site. HCC therefore request a developer contribution towards enhancing this route.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. Subject to the suitability of the site being considered further through a Phase 2 of the Strategic Flood Risk Assessment (SFRA), the council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft with wording amendments and revisions to reflect and incorporate the recommendations of the SFRA Phase 2. In addition, consider the following amendments:

- Amend criterion (c) to confirm there is an on-site requirement to provide a drainage solution that reduces surface water run-off on site in line with Policy E12; and that in addition, a developer contribution may be sought towards a flood alleviation scheme where deemed necessary
- Add a developer requirement to require contributions towards the improvement of the footpath as a result of the additional footfall generated by the development.

Comments where no change is considered necessary:

Whilst the site promoter has not submitted any details of the proposed scheme through the Draft Local Plan, the Council expects applicants to work collaboratively with the community at an early stage (DR1). As part of this, the Council encourages applicants on major, significant and sensitive sites to engage with the community before a planning application is submitted.

All allocations in the Local Plan are set out as 'about' rather than minimums or maximums. Depending on the size and type of properties proposed through a planning application, it could be that different numbers of homes are achieved.

## H12 - Victoria Cottage Hospital

11 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Suggest inclusion of garden between site and A259.

Relocation of Emsworth Surgery onto this site / a new Health Centre / Healthy Living hub / temporary post-hospital care should be supported.

Support Sheltered Accommodation / Extra Care Housing / Care Home.

Support housing allocation.

Support mixed use for housing and community use.

A greater number of homes / higher density could be achieved.

There is no robust evidence to justify that the community use is still required on site.

If healthcare use is not possible, support community use, not housing or commercial use.

Existing building should be retained or a similar building provided to improve North Street area.

Cottage Hospital was paid for by Emsworth Residents - their views as to its future should be respected.

HBC should work with the CCG and other partners to strengthen the role this site has to make to providing care and support to older people in the area.

It is a lost opportunity that there is no plan to knock down the former cottage hospital in North Street in Emsworth and redevelop the site. The building is a brutalist faux Victorian mess and has been an eye-sore for at least 40 years. There is no reason to not redevelop the site.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments.

In addition, consider whether policy should be amended to include the garden land to the south.

Comments where no change is considered necessary:

- The policy allows for both housing and community uses, which could include accommodation for the elderly and / or health care uses.
- The heritage value of the building has been assessed by the Council's conservation officer and found not to warrant a requirement to retain the building as, although the building itself appears to have Victorian elements, it has been heavily altered over time.
- The site yield is based on a desktop estimate of a possible scheme with community uses on the ground floor and flats above. No evidence has been submitted that suggests that a higher number of dwellings would be suitable here. The number in the allocation does not preclude a future developer demonstrating that a different number is acceptable.
- The policy allocates the land for development, which could include replacement of the building.

## H13 - Land at Fowley Cottage

7 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

It is within the settlement boundary but visible from the shoreline footpath and the water. Therefore development should be sympathetically designed to ensure the setting of the AONB is conserved and enhanced. A bullet should be added to 'design and layout'

The policy recognises the risk of flooding to the site, but does not acknowledge the impact of climate change, which will result in a much greater proportion of the site being at risk of flooding over the development lifetime. You should be satisfied that this will not compromise the ability of the site to safely accommodate the number of dwellings proposed.

Would expect development at this location to provide a direct pedestrian link to the Havant Footpath 56, which forms part of the Solent Way / Wayfarer's Way, and runs along the southern boundary of the site.

Allocation does not highlight impact on residents in Beacon Square or Curlew Close or Clovelly Road.

Development would increase surface water flood risk.

Site is home to wildlife, including Bechstein's Bat.

Potential harm to TPO trees.

A shallow sewer crosses the site.

Loss of open space adjacent to the AONB's coastal path.

Preamble refers to site being adjacent to the AONB but this is not picked up in the policy.

Should be a maximum of seven houses, not about seven.

Concern over the location of the access.

How will this meet criteria for affordable housing?

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider the following:

- Highlight that the site has ecological value, including potential for Bechstein's Bat and so an ecological assessment would be needed
- Requiring an arboricultural assessment to support any planning application
- Highlight that the site should consider the setting of the Chichester Harbour AONB
- How the issue of residential amenity should be addressed, potentially by removing the specific reference to Warblington Road and so widening out the issue to all neighbouring properties
- Consider whether access should be provided directly from the site to Footpath 56.
- Clarify the site yield, bearing in mind climate change impact to tidal flood zone.

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Access (IN3)
- Drainage (E13)

#### Comments where no change is considered necessary:

The allocation as drafted acknowledges the sewer that crosses the site and requires an easement over it. As a result, it is considered that this issue is already addressed.

All allocations in the Local Plan are set out as 'about' rather than minimums or maximums. Depending on the size and type of properties proposed through a planning application, it could be that different numbers of homes could be achieved.

Given the size of the site, no specific affordable housing would be provided. This is in line with national policy in the NPPF and the Council is not able to change this.

## H14 - Land to the rear of Redlands House

4 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Objection to the site being developed for housing as it is unsuitable.

Redlands Grange is next to H14 and has not been shown on the map.

Redlands Grange, H6 and H14 will convert the north-east corner of the Borough from one of the most rural to one of the most highly developed areas.

The site is outside of the urban area (Policies AL2 and CS17 of the Adopted Local Plan). It is on semi-rural land, effectively in the countryside and, in accordance with the NPPF, "*conserving and enhancing the natural environment*", no development should take place.

The area is currently greenfield consisting of open spaces, countryside, natural habitats, trees and hedgerows; development would result in the loss of these amenities and be out of character with the surrounding area.

The site's development would conflict with Policy E19 (Best and Most Versatile Agricultural Land).

There is a large maternity roost of Bechstein's bat to the north of the site; there is little evidence of successful mitigation measures to protect this species.

There is the potential for badgers, dormice, birds and reptiles to be on or surrounding the site.

The site is adjacent to Redlands Lane which forms part of the Ancient Sussex Border Path; development will create dangers for drivers, walkers and cyclists using this route.

Request that a direct pedestrian link is included from the site to Havant Footpath 67 (Redlands Lane) and a contribution is provided towards its maintenance as to mitigate for increased footfall.

Access to the site is constrained:

- Long Copse Lane and the north of Hollybank Lane are single tracks with no footpaths
- Development (in combination with H6) will result in extra cars along the roads stated above
- Past observations of construction vehicles stuck at the top of Hollybank Lane during the Oak Tree Drive development.

The hospital and local schools are at full capacity and are unable to handle the estimated number of people from sites H6 and H14; the nearest school is also quite a distance away.

The site is isolated with the nearest bus service a 15-minute walk away; this will encourage greater car usage.

There are known surface water drainage issues and groundwater flooding problems in the area; this includes the recent Redlands Grange development which has incorporated SuDS.

The policy requirement to reduce surface water runoff is supported. It is suggested that managing flood risk at its source (i.e. on site) is the most appropriate risk management technique and that contributing to a flood alleviation scheme should be supplementary rather than an alternative.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to:

- State that development provides a drainage solution onsite and that a contribution is supplementary rather than an alternative (criterion c)
- Delete the reference that the site is greenfield and replace with alternative wording, such as "this is large housing in substantial grounds" rather than brownfield
- Include a design and layout requirement that the development includes a direct pedestrian link from the site to Havant Footpath 67 (Redlands Lane) along with a maintenance contribution as requested by HCC

The following detailed matters are for consideration at the planning application stage and are covered by policies in the Local Plan:

- Access (IN2 and IN3)
- Ecology (E15)
- Flood risk and drainage (E12 and E13)

Comments where no change is considered necessary:

- Redlands Grange is shown in the south-east corner of Figure 35
- The Council is proposing a renewed approach to the regeneration of brownfield land; however, it will not be possible to meet the Borough's housing needs from brownfield and greenfield sites in the Borough's existing urban boundary (Policies AL2 and CS17) alone. Therefore, sites outside of the existing urban area have had to be considered for development. This was addressed in the consultation on the Local Plan Housing Statement in 2016
- It is considered that the site contains Grade 4 agricultural land; this is not BMV agricultural land therefore draft Policy E19 does not apply
- The potential for the wildlife, including Bechstein's bat, has been highlighted in the site's opportunities and constraints (page 188) and has been referenced as part of the developer requirements
- The established network of natural habitats in the Borough will be outlined as part of the review on the Havant Borough Biodiversity Action Plan (BAP) which will be available in due course.
- The current and future capacity of the local schools and health facilities, along with public transport capacity and future growth, have been reviewed as part of the Borough-wide Infrastructure Delivery Plan (IDP)

## H15 - Forty Acres

29 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

A petition with 3,458 signatories with the following covering letter: "Full infrastructure review in area of 40 Acre Farm prior to planning submissions. We the undersigned feel strongly that Any planning permission on 40 Acre farm should be halted until the Local Plan 2036 submission to Government That the development process should be halted until a full site and surrounding infrastructure review ,with all applicable bodies, be carried out in line with Schedule 4 of T&C planning That all development should be halted until the publication of the NSSMP Priority Action No.2 & No.3 with regards to the site being identified as High suitability for Brent geese and Waders in a previous Havant Council survey. That all development consultations be halted until the developers claims of school catchment areas have been verified and safe access to catchment schools for children on foot assured. That full post-construction costings of maintenance, health and Safety issues of the proposed SuDS are identified, analysed and reported. That any other points brought up during public consultations or private correspondence be minuted and made available for public discussion prior to any planning decision being made."

Support for housing development on the site.

Transport:

- High speed traffic would need to be discouraged on Havant Road and two or three central reservations should be provided to ensure safe crossing / traffic lights should be provided to aid safe crossing
- More speed limit signage is needed / speed limit should be reduced
- The A2030 is already unmanageable in the morning and evenings in relation to the Rusty Cutter roundabout
- Alterations to the Rusty Cutter roundabout will cost millions; is this financially viable?
- Trying to cross the Rusty Cutter roundabout by foot or cycle is already dangerous
- A pedestrian/cycle link underneath the A3(M) would link the development to Bedhampton station
- If left turn only out of the development this will create a rat run situation on local roads as cars attempt to return eastbound. A right turn option will be dangerous or increase congestion
- Concern over access design

Other infrastructure:

- Patients can not get appointments at local doctor surgeries. Drayton Surgery no longer accepts patients from Bedhampton.
- The high number of houses proposed in the area will increase pressure on local schools which are already full
- School runs will take more time and adversely impact working parents
- There is no safe way for children to be able to walk to school
- The proposal for Morelands school to be the assigned school for the area is massively concerning for someone considering a family - the walk over the hill to access this is over 50 minutes, it would necessitate a trip by car and completely goes against all of the national initiatives around walking your kids to school and reducing car journeys and pollutants to protect the environment.
- A new school should be required on the site
- Welcome the approach in the policy regarding education infrastructure. However supporting text should be updated to ensure complete consistency with the IDP, which states that Morelands School can expand to 3FE. The next version of the Local Plan should reflect the latest position agreed with Hampshire County Council.
- Queen Alexandra Hospital is already at breaking point
- The infrastructure associated with Forty Acre Farm needs to ensure the site is deliverable and any wider cumulative improvements should not restrict the delivery of the site. Contributions should be sought from surrounding developments to deliver the wider cumulative improvements
- This site is being pushed forward faster than it should and that more time be devoted to researching the infrastructure needs
- The need for Secondary School and College places has not been discussed

- Offsite water mains reinforcement will cause disruptions to local residents

#### Drainage:

- Flooding of the site is a concern
- Possible diversion of surface water into Westways should be addressed
- Proposed SuDS ponds in flood area 2 and 3 will be a breeding ground for mosquitoes - how would issues such as these be monitored and remedied?
- The sea water flood plain is designated as a “high level constraint” by the Environment Agency
- The area is a “flood risk area from surface water” - The fields currently act as a natural ‘sump’ absorbing surface water. With any development the ‘sump’ will disappear
- There is insufficient capacity within the foul sewage network to take the proposed discharge from the site
- In 1980 a planning application at Forty Acres Farm was refused by HBC, for a housing development, due to a sewage reason and unsatisfactory disposal of foul and surface water
- Any SuDS features must be outside of the flood zone to be effective

#### Ecology:

- Brent Geese are present on the proposed development site, the nature reserve area proposed by the railway line will not protect the geese.
- A new survey should be conducted using local residents and independent sources who have the time to monitor the site and report accurately. All development should be halted until the publication of the North Solent Shoreline Management Plan (NSSMP) Priority Action No.2 No.3 is completed
- Bats and deer are present on site. Any wildlife will be driven away by development
- A bat study was undertaken in 2016 showing four species of bat using hedgerows at the rear of Westways and within the site
- Brent Geese are not using the mitigation land next to the One Eight Zero Development, the mitigation proposed on the 40 Acre site is also unsuitable.
- HBC is working off an amber bird list which is 8 years out of date. During this time I have recorded 150 plus Brent Geese. Numbers and photographic evidence may be found on the Solent Birds web site.
- The evidence base is incorrect with regard to Brent Geese and waders. There are regularly 50+ birds feeding
- The nearby Farlington Marshes protected area may be impacted by development
- Figure 22. Map doesn't show Forty Acres as a Sites of Importance Nature Conservation (SINC) Hampshire Biodiversity Information Centre (HBIC) shows it as H04B & H04C

#### Health impacts arising from:

- Increased pollution and noise from more cars
- Lights from cars shining into bedroom windows due to raised ground level
- Higher ground level which will create higher building heights relative to surroundings, this will create less light for adjoining dwellings.
- Large dust clouds which may affect the quality of life of adjoining residents will result from construction works and re-grading.
- Pollution arising from the motorway and rail line affecting future residents of the development.

Further parking assessment should take place as distance to schools promotes car ownership and use - pedestrian access to Westways will make it easy for overspill parking to occur in Westways, particularly associated with the care home which does not have enough parking. Parking for a convenience store must be secured and appropriate.

The field is high quality agricultural land and no reference is made to this in the policy. Provision of allotments is not sufficient to offset the loss of agricultural land.

Tree screening proposed to the front of the development should be provided prior to any commencement to ensure this is established by the time building work is complete.

PUSH specifically states there should be separate identities between boroughs. The current gap between the two authority areas should remain. This gap is of particular importance as it is surrounded by commuting

routes of A27, A2030 (Havant Rd), A3M, and the London to Portsmouth and South Coast Railway Line. Forty Acres is easily visible from all these transport routes by hundreds travelling each day. So according to PUSH it should be preserved.

No mention is made in the plan of consultation with Portsmouth County Council.

To lose the last remaining green space at the bottom of the hill is irresponsible - Housing need should be balanced against the need to protect green spaces. Forty Acres is a local green space.

The potential for the site to accommodate a convenience store has been investigated in depth, provision of a convenience store is not feasible and reference to this should be removed from the policy.

The land should be used for sport provision and to generate a better green environment rather than housing.

Three storey buildings do not fit in the street scene.

The play space being located next to the SuDS ponds is unsafe.

To develop this site contradicts Councillor David Guest, Cabinet lead for Planning and Place-Making with regards to "...continued protection of the high quality environment that makes Havant an attractive place to live and work and visit". Residents feel HBC lacks the conviction to stand up and protect the wellbeing and environment of its residents and is bowing to central government.

Trees with TPO's would need to be felled in order for the development to proceed. Are these trees healthy and just deemed a casualty in order for development to proceed.

The general area has many instances of Late Iron Age and Roman settlement, which would be disturbed and lost. As a local historian, this concerns me.

#### **HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to:

- Provide greater certainty that safe access to local schools must be provided
- Include reference to the current agricultural use of the fields
- Remove the requirement for a convenience store
- Update references to reflect further discussions with Hampshire County Council which indicate that children arising from the Forty Acres will feed-into Bidbury Infant and Junior Schools (rather than Morelands School). This is subject to highway improvements to provide a safe and convenient route to the schools.

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (including parking) (IN3)
- Access (IN3)
- Future management (including SuDS) (IN4)
- Ecology (E15)
- Flood risk and drainage (E12 / E13)
- Residential amenity and pollution (E6 / E20)
- Archaeology (E9)
- Woodland, trees, hedgerows, TPOs (E15)
- Landscape and Townscape (E10)

The draft Infrastructure Delivery Plan (IDP) which was published alongside the regulation 18 draft of the Local Plan, identifies deliverable solutions for 30 different types of infrastructure with the notable exception of transport. The following matters raised are considered in detail through the draft IDP:

- **Transport** - Buses, walking and cycling
- **Green & Blue** - Open space and playing pitches, coast including flood risk management and defences, SUDS and other drainage systems, green routes including public rights of way and ecology including SPA
- **Social** including leisure (built sports facilities) and community centres
- **Health** - Primary care (GPs and health centres) and Acute care (hospitals)
- **Education** - Schools (primary and secondary)
- **Utilities** - Water supply, electricity, waste water and sewage disposal

Comments where no change is considered necessary:

Some of the comments made relate to the developer's proposals as presented in November 2017. These proposals may change, and will be considered against the relevant policies when an application is made.

The part of the site where housing development is proposed is located within Flood Zone 1, an area with less than 1 in 1000 year annual probability of sea or river flooding. Concerns raised in relation to flooding in this area are likely to be in relation to surface water flooding due to ground conditions and location. As above, an appropriate drainage strategy as part of any proposed development would be secured in accordance with the requirements of policy E12. A part of the southern area of the site is in flood zones 2 and 3. Any development vulnerable to flooding would be required to be located in flood zone 1.

When considering which greenfield sites are suitable for allocation, the council has sought to prioritise sites of a lower agricultural quality. However, the available evidence is that the majority of land in the borough is of the best and most versatile quality (BMV). Therefore, the allocation of housing sites on BMV is unavoidable if the borough is to meet its housing need. In order offset the loss of BMV, the policy identifies a need for the development to include community growing provisions such as allotments as part of the open space provision.

Although Hampshire Biodiversity Information Centre list the site as a SINC, this is incorrect. A SINC is a local designation and can only be applied by the Local Planning Authority. The site is likely to be termed a SINC by the Hampshire Biodiversity Information Centre due to its use by Solent waders and Brent Geese. This is highlighted in the Draft Local Plan through Policy E17. As such, appropriate protection of these species is already provided without the need for a SINC designation.

The proposed development is in line with the latest data regarding the Solent Waders and Brent Goose network, which has been put together in consultation with Natural England. As such, matters relating to NSSMP Priority Actions No.2 and No.3 are not applicable in this instance. The Eastern Solent Coastal Partnership are a partnership, including Havant Borough Council. The findings of the study will inform the future approach to coastal development and coastal defences in the Local Plan.

This Policy seeks to maintain the high-quality environment of Havant by effectively managing future development.

The PUSH Spatial Position Statement supports strategic countryside gaps, but it is not considered that any gaps of 'sub-regional significance', nor of 'fundamental local importance' exist in the Borough, which would outweigh the need for housing.

It is acknowledged that undeveloped gaps were protected by policies in the adopted Local Plan. However, in the new HBLP2036 it is no longer possible to continue this protection, as there are not enough brownfield sites and sites within the existing urban area to meet the Borough's housing need. Therefore, greenfield sites outside of the existing urban area have had to be considered for development. Figure 18 draws the

settlement boundaries around existing developed areas, and the proposed allocations in the draft HBLP2036, and E10 seeks to manage development outside of these areas (windfall sites).

## H16 - Land East of Castle Avenue

6 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Principle of Allocation

Support for this policy, which allocates UE02a and UE53.

Support Criterion b. which requires that the site is developed comprehensively, or if this is not possible, the development of one part must not prejudice the development of the other part.

Criterion b. pertains to matters that are private legal matters and do not fall within the remit of planning and as such part b of the policy should be removed from the policy. The two parts of the site (UE53 and UE02a) should be allocated individually.

Objection based on loss of the gap between Emsworth with Denvilles/Warblington and destruction of the identity of these communities / The Council gave assurances that there was no intention to develop land between Denvilles and Emworth.

The Council should be willing to be more robust in the protection of the Emsworth - Warblington gap as was the case in the prior local plan. No new evidence has been provided as to why the existing policy has been so conveniently ignored.

Do not disagree with any of the allocation site's opportunities and constraints identified by the Council.

#### Traffic & Transport

A single access point (off St George's Avenue) is insufficient.

Agree with suggestion that access should be taken from St George's Avenue (criterion h iv).

The need for traffic calming measures (criterion c) will be assessed through detailed transport work at the application stage.

Support need for traffic calming measures (criterion c).

Support requirement for new pedestrian and cycle access to Emsworth Road in the south-west of the site (criterion h v).

Support requirement h vi, to provide, or at least not prejudice pedestrian and cycle link under the railway line to provide easy access to Warblington station from Southleigh (criterion h vi).

Concerned about the effect of a very high increase in the volume of traffic from any new development through Castle Avenue, on to Southleigh Road, past Warblington School, and through the level crossing at Warblington Station.

Southleigh Road is already congested by the crossing and it is clear that extra traffic will lead to severe congestion around the school and backing up along Castle Avenue and Southleigh Road. Safety issues will arise particularly around the school.

If development goes ahead provide road access to the site which does not use St Georges Avenue Castle Avenue or Warblington Avenue as access routes.

Given the size and proximity of the site and its potential impact on the SRN, either individually or cumulatively, it is requested that any potential adverse impacts to the safe and efficient operation of the SRN be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

#### Character of the Area

The area of Castle Avenue/St Georges Avenue/ Warblington is a particularly quiet and high amenity value housing area of Havant which risks being compromised. The nature of such areas should be preserved in order to provide attractive housing environments for potential incoming residents.

The proposed number of dwellings is approximately double that on the similarly sized Castle Avenue, suggesting the development is out of keeping with the local area and will result in the construction of densely

packed houses with inadequate gardens and parking. The nature of any properties constructed must closely match the character and layout of the surrounding streets or else the number must be reduced.

The site itself, while physically close, is visually removed from the AONB due to being on the north side of the A27, and therefore is unlikely to have a significant impact on the setting of the AONB.

The large number of dwellings proposed and proximity to Chichester Harbour mean that the development is likely to contribute to recreational pressure within the Harbour and therefore the policy should include a criterion to ensure that this is addressed.

### **Infrastructure**

HCC state that no early years comment included.

There is insufficient space to provide adequate space for the provision of formal allotments. Policy wording should be amended to remove reference to allotments to provide flexibility for alternative methods of provision.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether policy should be amended to:

- Remove reference to some of the specific access points and/or mitigations measures as these will be determined by site specific transport assessment work at the application stage

Comments where no change is considered necessary:

- There is no need to split the site into two allocations, as the policy allows for the two parcels to come forward separately. This is a matter for the Local Plan as it is necessary to ensure that if the site comes forward through two applications, that it contributes collectively to a high quality development and provides the necessary infrastructure
- The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations, including on previously identified gaps between settlements
- The estimated site yield is based on a desktop exercise assuming a site yield of 35 dwelling per hectare. This is considered to be low density in current terms.
- Any need for early years provision has been addressed through the Infrastructure Delivery Plan
- No need to remove the specific mention to allotments, since they are an example of food growing; Applicants may demonstrate which specific type of food growing is the most appropriate for their site.

The following detailed matters raised in the comments are for consideration at planning application stage and are covered by policies in the Local Plan:

- Detailed design (E6 and E7)
- Landscape and Townscape (E10)
- Site specific impacts on the local road network (IN3)
- Access (IN3)
- Residential amenity (E6 / E20)
- Solent Special Protection Area (E16)

## H18 - Portsmouth Water Headquarters

2 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for policy.

Concerns over impact on traffic.

Proposed access to the site via Brockhampton Road is already heavily congested.

Concerns over impact on neighbouring properties in terms of overlooking and loss of privacy.

Concern over impact on community and ambience of established neighbourhood.

Parkland is over natural springs and unsuitable for building.

Concern that development will result in loss of views over grounds where there is an abundance of wildlife, trees and open park land.

Text regarding loss of trees should be amended for greater flexibility when considering site layout.

Use class of dwellings should be made flexible to include a mix of C3 and C2 uses.

The Pump House is to remain in operation and be maintained as a locally listed building and buildings adjoining the pump house need to be retained for operational reasons. The red line should be amended to reflect this (see rep). The site is still considered capable of delivering 120 homes (revised site area 2.83ha).

Since the proposed allocation includes a Locally Listed Building, text should be amended to read as follows: Preserves and/or enhances the character of the conservation area subject to appropriate planning balance.

Given how quickly any potential pollution could reach the drinking water supply in this area a construction method statement should be required.

The site is likely to be underlain by sand and gravel and therefore there is a likelihood that the site contains safeguarded minerals. Developers should undertake a minerals assessment.

No early years or related infrastructure has been included.

Given the proximity of the site and its potential impact on the SRN, either individually or cumulatively, it is requested that any potential adverse impacts to the safe and efficient operation of the SRN be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with potential wording amendments. In addition, consider the following:

- Amend site boundary
- Potential to provide both C2 and C3 uses
- Retain vehicular access to pump house
- Include reference to setting of locally listed building
- Require construction method statement (in point (a))
- Add minerals assessment to point (a)
- State that any adverse impact on the SRN is considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (IN3)
- Access (IN3)
- Ecology (E15)
- Woodland, trees, hedgerows, TPOs (E15)
- Heritage (E9)
- Residential amenity (E6, E20)

Comments where no change is considered necessary:

Development on land within Source Protection Zones is dealt with by Policy E22.

The capacity and future growth of early years infrastructure has been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP).

## H19 - Former Oak Park School

2 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The site allocation boundary is greater than the extent of Hampshire County Council ownership.

Concern that Government policy on local rent allowance has caused delay to site delivery.

HCC would expect any development at this location to provide high-quality pedestrian links to Shipwrights Way.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments.

In addition, consider the following:

- Review the site allocation boundary and amend site plan as appropriate
- Whether to include requirement to provide pedestrian and cycle routes to Shipwrights Way as part of the design and layout

Comments where no change is considered necessary:

Whilst concerns in relation to the timescales for the site delivery are noted - given the extant planning permission (reference APP/15/00303) is due to expire in December 2018, it is considered appropriate to retain the site as an allocation accordingly.

The Government's policy on local rent allowance is not a matter for the Local Plan to consider.

## H20 - Kingscroft Farm

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Developable area limited by flood risk constraints - potentially less suitable for residential development.

Deliverability of the quantum of new homes is doubtful.

It is requested that any potential adverse impacts to the safe and efficient operation of the Strategic Road Network (SRN) be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

Environment Agency welcome the requirement to provide sufficient easement to the Heritage Stream. The identified future risk of flooding has not been translated into the policy wording. More information is required before it can be demonstrated that this site can be allocated, to ensure that there is no increase in flood risk to new or existing development.

HCC supports criterion (b)(v) of this policy, which seeks to retain and enhances the existing right of way. An aspiration of the Hampshire Countryside Access Plan is to upgrade Havant Footpath 35 (which forms part of the Wayfarer's Walk) to a multi-user one from Brockhampton Road to Meyrick Road.

### HBCs proposed way forward for Regulation 19 HBLP2036

No matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. At this stage, the council is satisfied that the evidence base supports an allocation. However, given that much of the site is in future Fluvial Flood Zone 3, flood risk constraints will be considered further through Phase 2 of the Strategic Flood Risk Assessment (SFRA).

Proceed with policy as proposed in the regulation 18 draft, with wording amendments and revisions to reflect and incorporate the recommendations from the SFRA. In addition, consider the following:

- Review site capacity having regard to site-specific constraints and the site submission from the landowner.
- An additional criterion to ensure the safe and efficient operation of the SRN.
- Whether it is appropriate to include a developer requirement for a contribution towards the improvement of the footpath.

## H21 - Land West of Havant Crematorium

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support the allocation and the accompanying policy details

Object as site is in a strategic gap / outside the urban area / would result in the loss of open spaces, countryside and natural habitats

Schools, doctors and hospitals are at capacity

More suitable sites for development need to be found which will have far less impact on the surrounding environment and have an infrastructure capable

This greenfield site does not appear to be particularly affected by any constraints that would act to fundamentally prevent its development

Requirement for access arrangements to be coordinated (criterion c) means delivery of this site is unlikely to occur during the earlier part of the plan period.

H21f(i) states that there shall not be any residential development within 183m of the crematorium. However, the policy does not specify whether this is to be measured from the boundary or the structure itself. This point should be clarified as this has potential implications in relation to the extent of the available developable area.

East Hampshire District Council suggest that the map should be amended to clarify that the allocation is only for that part of the site that lies within Havant Borough. A dotted line to show the wider extent of the land ownership can be used to show the potential extension in East Hampshire District (which will be subject to the EHDC Local Plan Review).

HCC would expect development at this location to contribute towards high-quality multi-user links to Southleigh Forest and the Southleigh allocation to the south.

It is noted that the Land West of Havant Crematorium (H21) is smaller than criteria usually used for judging impacts on the mineral resource (3 ha), however when combined with a prospective development in the adjacent East Hampshire District Council area it becomes a more significant site of 6.28 ha, therefore HCC encourage prospective developers to undertake minerals assessment of this site prior to development.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments:

- Amend criterion (f)(i) to specify that the design and layout must meet the requirements of the Cremation Act 1905

In addition, consider whether to add requirements:

- to contribute to high-quality multi-user links to Southleigh Forest and the Southleigh allocation to the south
- to explore opportunities for the prior extraction of minerals

Comments where no change is considered necessary:

The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.

The Local Plan is underpinned by an Infrastructure Delivery Plan.

## H22 - Land south of Lower Road

72 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

A petition was submitted titled "Petition to Havant Borough council regarding the removal of Site H22 (UE30) in the Borough Council's Housing Statement 2036". This petition has 1,785 signatures. The petition sets out "We, the undersigned, petition Havant Borough Council to remove site H22 (UE30, Land south of Lower Road) from any future consideration as a housing in their Local Plan 2036 for one, some or all of the following overriding reasons:

- The damage it will cause to the historic and landscape setting of the Old Bedhampton Conservation Area
- The irreparable harm it will cause to the ancient heritage of this part of the Borough
- The detrimental change that development will bring to the amenity and character of the area
- The added dangers that will arise on the blind corners and shared roadway of Lower Road and at the mini roundabout junction on Bedhampton Road as a result of the significant additional traffic using the bends and making right turns into Brookside Road
- The failure to comply with government guidance and the core principle of protecting heritage assets contained in paragraph 132 of the National Planning policy Framework and Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- The ability to provide 50 houses on other less sensitive sites
- The precedent that would be set for future further development in this area
- Any public good that might be generated would not outweigh the harm and danger that would arise from development.

Objections to the site's development and requests to remove the site from the HBLP 2036.

The need of housing is understood; however, the site is unsuitable for development.

The public good that might be generated from development would not outweigh the harm and danger that would arise from development.

The Council should insist on the development of brownfield land, especially industrial land which is underused for development.

The area has '*done its bit*' for new housing; the Council has not improved the area's recent influx of new development through new services, road traffic management and/or upgraded amenities.

Existing residents have paid a premium to live in the area; the proposal has already stagnated property prices.

New housing in the area would not be affordable for the individuals who need them.

Suggestion to reduce the site capacity to 10 dwellings and set them back from the road.

Concerns that development will set a precedent for further development on adjacent fields and contribute to urban sprawl; along with comments regarding a "*concrete jungle*" and concerns regarding the erosion of local gaps and the merging of the area with Farlington and Drayton.

Previous consultations introduced policies whereby development between settlements should only be approved if it maintains the separate identity of settlements.

Concerns over the capacity of doctors, dentists, schools and utilities (i.e. drainage and water supply) in the area at present.

The Council and the Planning Inspectorate previously rejected the site's inclusion in the Local Plan (Allocations Plan) [July 2014] for 15 to 250 dwellings; the Council stated at the time that it was the least favoured site at the time. The Inspector's decision is a material consideration.

There is "contingency" within the Draft HBLP 2036 to remove the site; the ability to provide 50 dwellings could be achieved on less sensitive sites.

The development would increase the number of dwellings along Lower Road by two-thirds.

Recollections of how re-building homes in and around the Old Bedhampton Conservation Area was difficult due to restrictions on design, layout and materials.
Question raised as to why houses were not built on the Central Retail Park in Havant Town Centre when the option was available at the time.
The site is close to Langstone Harbour, an Area of Outstanding Natural Beauty (AONB).
The inclusion of this site renders the whole HBLP 2036 unsustainable.
Support for the site's allocation; the site is a sustainable location due to proximity to shops, public transport and pedestrian/cycle routes.
The site will include affordable housing to meet the LPA's policy requirement of 30%.
<b>FLOODING &amp; UNDERLYING AQUIFER:</b>
The road and site are low-lying and adjacent to a flood plain; the area regularly floods, as such development and tree removal will exacerbate this further.
Concerns over the proximity of the site to a natural spring.
Lower Bedhampton constitutes a vital aquifer for this area; the proposed sites falls within a Protected Zone.
Although the requirement to mitigate potential impacts to the solution feature and avoid contamination by pollutants is accepted, an objection is raised for the mitigation to be agreed with both Portsmouth Water and the Environment Agency. This duplicates the responsibility and risks a conflict between the public duties and private commercial interests of the water company.
<b>CONSERVATION AREA &amp; HERITAGE:</b>
The site would be accessed through the Old Bedhampton Conservation Area; this would increase traffic and destroy the historic heritage, landscape setting, character, amenity and tranquil feel of the area.
The Conservation Area's Appraisal states on page 5 that: <i>'An important aspect of the character of the Conservation Area is the relationship of the old village with the surrounding countryside and open spaces....the village still enjoys an open and undeveloped setting'</i> .
Questions raised regarding the timing of this proposal when a heritage consultancy has been commissioned with the agreement of the Council to report on the Old Bedhampton Conservation Area Appraisal. There were also concerns that this report will not be available until later this year.
The emerging Old Bedhampton Character Appraisal may result in the revisions to the boundaries of the Conservation Area and guidance on how to protect the area from detrimental impact of development outside its boundaries.
The area is associated with the poet John Keats due to his frequent visits.
The area should be viewed with pride as an example of conservation in action.
The landowner makes the land available to archaeological groups periodically (recent January 2018) to search and find artefacts and coins dating back to the Roman era.
Suggestion that the small-brick railway bridge should be investigated for archaeological and historical relevance.
Concerns over the foundations of the Elms (Grade II listed) from heavy traffic (both private and commercial); damage would undermine the expenditure made in the last two years to strengthen the building.
The Elms is not mentioned in Paragraph 6.104 of the HBLP 2036.
Development would be against the principles of Paragraphs 129 and 132 of the NPPF and Section 66(1) of the Planning Listed Buildings and Conservation Areas Act 1990; along with the principles to ensure development is in keeping with the character of the surrounding area.
Appeal decisions from elsewhere in England show that Inspectors feel that even when the harm to the setting of heritage assets would be less than substantial this would not be outweighed by the public benefit.

Development is contradictory to Paragraphs 5.105 and 5.109, along with Policies E9 (especially Criterion d) and E10 (especially Criterion a.i) of the Draft HBLP 2036.
Development is contradictory to the statements in the ‘ <i>where next for the environment</i> ’ booklet.
The original supplementary conservation area guidance recognised the area as having a rural character; Criterion f.ii) contradicts this as it refers to a semi-urban/rural setting.
The Landscape Character Assessment Sensitivity Report 2007 noted the winding alignment of the area’s roads and how the railway, A27 and A3 bypass have preserved the tranquil character of this historic core. It also notes that a key local issue will be preventing developing eroding the settlement character.
The Borough has limited cultural heritage; the area is important for tourism and education.
The Planning Officers have a professional duty to safeguard such heritage and ecological assets.
Questions raised regarding whether Historic England (HE) have been consulted.
The site will reflect and protect the historic context of the locality, including the Conservation Area and nearby listed buildings.
<b>BIODIVERSITY &amp; OPEN SPACE:</b>
The site is prime agricultural land and is used annually for growing crops.
The site and its surrounding hedgerows are used by wildlife including, foxes, deers, bird of prey (e.g. Buzzards and Red Kites), woodpeckers, kingfishers, geese and bats.
Proposed plans have been seen by residents from pre-application discussions (obtained via FOI); these include the removal of 40m of hedgerow which would be a contradiction of Paragraph 2.35 and the objective to protect or enhance the natural environment of the Draft HBLP 2036.
The site is identified as “important” for Brent Geese and Solent Waders.
The allocation appropriately highlights that the site is identified in the Solent Waders and Brent Goose Strategy; however, the RSPB urge that the update of the Strategy is consulted as further information on the use of this site is available.
Policy E18 (Figure 25) shows that the Bechstein’s bat area covers the site yet this is not listed under the constraints of the site.
Observations of bats, including Bechstein’s bat, in the area; development would break the continuous corridor/network of their habitat.
Concerns over the environmental impact the development will have on Bidbury Mead.
Concerns over the loss of open green space which is of natural beauty and valued by residents.
The site will include several diverse areas of open space provision and retention/protection of existing trees on boundaries.
Objection to criterion f.iii). The public open space should be located in the south part of the site. There is substantial tree buffering along the eastern edge of the site that already provides effective containment to the site and ensures screening to views from that direction.
<b>RIGHTS OF WAY:</b>
Suggestion that a link between the site and Havant Footpath 30 would be a benefit.
Request that a contribution is paid to Hampshire County Council (HCC) towards enhancing Havant Footpath 30.
Development should not compromise the ability of the agricultural access bridge to be used for future pedestrian/cycle access.
It is requested that any potential adverse impact to the safe and efficient operation of the SRN is appropriately considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013.

## ACCESS & TRAFFIC:

Access to the site is via a narrow, blind, triple bend with no pavements.

Road widening would not be possible due to the impact on the Old Bedhampton Conservation Area.

Access via the enclosed end of Lower Road is not possible due to current Traffic Planning Laws and the location of the A3(M), Tear-drop junction and Rusty Cutter roundabout.

Access via Kingscroft Lane is not possible as it cannot accommodate two-way traffic.

Pre-application discussions (obtained via FOI) show that the access is proposed from the middle of the lower road frontage. This will impact upon the "sunken lane" nature of Lower Road where mounding exists.

The pre-application proposal introduces kerbs; this will visually intrude into the landscape and character of the area. It also shows that there is no proposal for road widening of Lower Road or footpath on the north side.

Grass verges have already been damaged by parked cars and vehicles passing one another.

Questions raised as to whether the access has been discussed/consulted with the Highway Authority.

Brookside and Lower Roads are below modern road standards due to their age and location.

Concerns over the safety of pedestrians (including pushchairs, wheelchairs, children and older residents), cyclists and vehicle users, as increased traffic will increase the risk of accidents due to:

- Vehicles approaching the bends use the centre of the road;
- Parked cars forcing vehicles to travel on the wrong side of the road;
- Vehicles speeding around the bends;
- Close incidents between motorists with other vehicles and/or people already documented at present;
- Recollections of previous accidents;
- Pedestrians crossing the road diagonally;
- No footpaths on either side of Brookside Road and the triple, blind bends;
- The proximity of two residential care homes (The Lodge and The Elms), and;
- Restricted access for emergency vehicles around the site and impact on efficiency and speed of emergency services around the area due to increased traffic.

The above bullet points are not covered in the opportunities and constraints.

Lower Road forms part of the national cycle network and is highlighted as a "suggested link route" in the Havant Borough Cycle Network Map 2017.

Existing residents have difficulty accessing their drives at peak times.

In response to the Local Plan Housing Statement, residents arranged a film activity on the Lower Road bends; this showed peak movements occurring in the weekday evenings with numbers approaching the capacity identified for a "shared roadway" in Manual for Streets. Once movements exceed 100vph, the shared nature of the such streets no longer works well.

Vehicles are forced to turn left out of Nursery and Brookside Roads and go around the mini-roundabout in order to travel east of Havant Town Centre.

Brookside, Bedhampton and Bedhampton Hill (B2177) Roads are difficult junctions at present; development will cause greater congestion and queues around the Rusty Cutter roundabout, Broadmarsh junction and the A3(M).

The mini-roundabout cannot take more than one car and the filter lane to turn right into Brookside Road only has capacity for two to three cars; greater traffic will cause queues onto the mini-roundabout.

Concerns that greater congestion along the above roads will lead to Kingscroft Lane and Brookside Road also becoming congested as drivers will seek shortcuts.

Concerns over the increased air pollution.

Concerns over the environmental impact of heavy good vehicles during construction; statements that reverberations are felt along Bedhampton Hill Road at present.

Comments that the current excavation/water works along Lower Road have caused disruption.

Comments regarding the disruption caused by large trucks on the road and parked on verges during the implementation of the recent permission at 11 Lower Road. The workers ignored the rules applied to the Old Bedhampton Conservation Area.

The need to mitigate transport impacts (Paragraphs 4.31 and 4.41, along with Criterion b) of Policy IN3 of the Draft HBLP 2036) would be difficult for both H15 and H22.

Suggestion to identify an alternative access to the site, along with additional traffic lights and calming measures (i.e. speed bumps).

Speed markings on the roads are now fading/partially obscured.

Claims that access to the site, including surveys, have already been completed and approved.

Objection to the requirement of a Travel Plan (Criterion a.viii) due to limited amount of movement to be generated by the proposed site, the existing availability of public transport in the locality and the limited scope for further enhanced travel by non-car means beyond the site boundary.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

The Council is aware of the site constraints but has had to consider the site allocation given the high housing need. Nevertheless, the Council will further consider the suitability of the site for development, particularly regarding highways and heritage.

The Draft Local Plan indicates there are sufficient sites to accommodate the need for housing together with a reasonable buffer. This would not change if this site (and others where the principle of residential development is being further considered) is not allocated. On this basis, it is appropriate to further consider the principle of residential development on this site after further discussion with the relevant statutory stakeholders has taken place.

Notwithstanding the above, if the allocation is to still proceed in the future, consider whether the policy should be amended to:

- Include a reference to nearby listed buildings in the Site Opportunities and Constraints
- Include a requirement that mitigation will need to be provided in line with Policy E18 if Bechstein's bat is present on the site
- Include a requirement that development should not compromise access to the agricultural bridge
- Include in the site opportunities and constraints that there is an opportunity to provide a link between the site and Havant Footpath 30
- Include a requirement that a contribution is paid towards enhancing Havant Footpath 30
- State that any adverse impact on the SRN is considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013.

As specified in the summary table for proposed Policy E17, the Solent Wader and Brent Goose Strategy (2018) is currently being reviewed and will be published in due course. This will inform the Pre-Submission Local Plan.

The comments raised regarding the surrounding road layout and highway capacity will need to be addressed in a Transport Assessment (TA) and Travel Plan to support any future planning application. As such, consider whether further clarity on the expectations of these assessments is needed and whether more specific details should be included in the Site Opportunities and Constraints section.

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- IN2 - Improving Transport Infrastructure
- IN3 - Transport and Parking in New Development
- E2 - Green Infrastructure, regarding the provision of public open space on new developments
- E9 - Historic Environment and Heritage Assets
- E10 - Landscape and Townscape, regarding the separate identity of settlements
- E12 - Managing Flood Risk in New Development
- E13 - Drainage Infrastructure in New Development
- E15 - Ecological Conservation
- E17 - Brent Goose and Wader Feeding and Roosting Sites
- E18 - Protected Species, regarding Bechstein's bat
- E19 - Best and Most Versatile Agricultural Land
- E22 - Aquifer Source Protection Zones
- H2 - Affordable Housing
- H3 - Housing Density and Mix

Comments where no change is considered necessary:

- The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations
- The price of existing property is not a material planning consideration.
- The current and future capacity of the local schools, health facilities and utilities have been reviewed as part of the Borough-wide Infrastructure Delivery Plan (IDP)
- Langstone Harbour is designated as a SPA, SAC and SSSI; however, it is not designated as an AONB. The only AONB within the Borough is Chichester Harbour
- Historic England (HE) is a statutory consultee and have therefore been consulted on the Draft HBLP 2036; in their response, they have not commented on this site allocation. Their representation is available to view alongside these summary tables
- The emerging Old Bedhampton Character Appraisal, if adopted by the Council, will inform any future allocation policy for this site and will also be considered as a material consideration when determining any future planning application
- The Council has consulted with Hampshire County Council (HCC) as Local Highway Authority on the Draft HBLP 2036
- The small railway bridge is not in the site area, as such there would be no need for an archaeological and heritage assessment.
- The PUSH Air Quality Assessment is underway and, when finalised, will inform the local plan regarding appropriate mitigation
- The Council disagrees that the public open space should be in the south part of the site only; the lower density proposed for this site means that open space could be incorporated in both the eastern and western sections in order to provide a landscape buffer between the development and the Old Bedhampton Conservation Area, as well as the railway line
- Plans proposed at pre-application discussions are not necessarily the plans proposed as part of a planning application; in general, proposals will change from the pre-application as the applicant learns more about the site and its context/constraints
- The Council disagrees with the statement that a Travel Plan (Criterion a.viii) would not be required; both a Transport Assessment and Travel Plan will be required to support any future planning application
- The access to the site via a narrow, blind, triple bend with no pavements has been highlighted in the Site Opportunities & Constraints
- The environmental impact of construction will be managed, as far as is possible within the limits of regulations and, where appropriate, using planning conditions

## H23 - Littlepark House

2 response was received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Concern over the suitability of the site with regard to access and topography.

Littlepark Avenue suffers damage to grass verges by heavy vehicles - Question raised as to whether contractors relating to the site will be liable for damage caused.

Loss of any woodland is regretted but the need for more housing is understood.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft. In addition consider whether:

- A contribution to enhancement of footpath 28 is required

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Access (IN3)
- Woodland, trees, hedgerows, TPOs (E15)

Comments where no change is considered necessary:

Damage caused to the local highway (including verges) is a matter for the highways authority and is not a matter for consideration in the local plan.

## H24 - Car Park behind the Bear Hotel and East Street

17 responses were received regarding this topic

### Summary of comments raised by residents and other stakeholders

*Please also see comments relating to East Street in the KS1 Havant Town Centre table*

#### General

Supportive of regeneration in the area. Closed premises detract from the town centre.

Figure 45 shows the end of East Street and nearby areas, not just the Bear Hotel Car park and East Street.

Needs to be made clearer that this proposal includes East Pallant Car Park.

East Pallant Car Park is not a brownfield site.

Opportunities for achieving more housing at East Street include relocating the Royal Mail sorting office to an industrial site and the council compulsory purchasing nos. 5,7, 9 & 11 East St and 10a The Pallant.

Havant Footpath 108 and the Shipwright's Way are located within close proximity of this site. This development would generate additional footfall upon the local rights of way network. HCC therefore request that the allocation include a contribution towards enhancing the local rights of way network, which provides accessible recreational routes to the coastline.

The policy should reference being located in SPZ1/1c for the Havant and Bedhampton springs.

#### Character of the area

Concerns over impact on the character of the area.

Any development should be in keeping with the historic character of the area.

Development will obliterate historic gazebo.

Concerns that building homes near the Gazebo garden would make it less visible and negatively impact its setting.

More can be done to preserve and enhance the Gazebo Garden.

Front buildings should be retained.

#### Roads/Parking

Concerns over loss of parking, it is well used and required to serve nearby facilities/businesses as well as school pick up/drop off.

Concerns over traffic congestion on local roads.

The station car park is not easily accessible from this direction. More vehicles using Fairfield Road to cross the rail line would create large traffic queues outside the primary school.

Concerns that all new developments will be private roads with parking restrictions further adding to parking issues.

East Pallant is narrow with no suitable access for heavy vehicles.

Existing properties off East Pallant and to the rear of East Street need access for services: emergency vehicles, delivery vehicles, removals vans, dust and waste collection vehicles. The turning area and available space is already restrictive.

More parking needed.

#### Infrastructure

Concerns over sewage system and drainage.

Local schools are already oversubscribed.

Concerns over impact on health provision.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- The policy title should be amended for clarity
- A contribution to enhancement of footpath 108 is required
- The policy should reference being located in SPZ1/1c for the Havant and Bedhampton springs

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (including parking) (IN3)
- Heritage (E9)

Comments where no change is considered necessary:

- Hard landscaping, such as for a car park, constitutes development and therefore the land would be considered 'previously developed' or 'brownfield'.
- The plan does not preclude further housing development along East Street, however, sites must be available for development to be included in the Local Plan
- Any planning application would be required to be supported by a Heritage Statement which would address impact on heritage assets. Furthermore, Policy E9 sets out requirements in relation the historic environment.
- The policy requires the listed Buildings to be retained.
- The capacity and future growth of sewage, education and health infrastructure has been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP)

## H25 - Southleigh Park House

2 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Object to allocation based on:

- Site being in a strategic gap / outside the urban area
- area is currently in agricultural use
- loss of open spaces, countryside and natural habitat
- grade II Listed Buildings and their setting
- mature parkland (on the Hampshire register of Parks and Gardens) which is of great local importance
- protected trees on the site
- Bechstein's bat on the site
- there is an existing strong landscape boundary, including mature trees and hedgerows
- the site is in Groundwater SPZ 1c for the Bedhampton and Havant springs
- Schools, doctors, local hospital are full to capacity

More suitable sites for development need to be found which will have far less impact on the surrounding environment and have an infrastructure capable of supporting the proposed developments.

Figure of 35 is not justified and is not realistic from a delivery perspective.

Changes should be made to the wording of the policy in relation to the impact on the historic parkland of proposed development to the south.

The text refers to the site's proximity to a noise sensitive receptor, but provides no further detail.

Extensive survey work carried out to support the planning application revealed that bat activity on the site was relatively low. The text should reflect this.

The text refers to storage tanks formerly/currently present on site. The landowner is not aware of any such former use on site, and it is suggested that this is an error.

It is unrealistic to expect the retention of the protected trees (criterion d) given the number of trees on site and the challenges in bringing forward a viable development that protects and conserves the listed buildings.

The design and layout also requires highways works to the south side of Bartons Road and around the junction of Bartons Road and Horndean Road. This requirement should be more prescriptive regarding the extent of works.

Consideration should be given to the potential to address highway works as part of the wider redevelopment proposals in the area, as suggested in draft policy bullet 15 under Site Opportunities and Constraints.

HCC would expect development at this location to contribute towards high-quality multi-user links to Southleigh Forest and the Southleigh allocation to the south.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments.

In addition, consider whether policy should be amended to:

- Refer more extensively to the historic buildings and historic parkland
- Clarify the noise sensitive receptor
- Clarify the position regarding storage tanks
- Be more specific regarding the required highway works and multi-user links

Comments where no change is considered necessary:

- The protection of trees and protected species is a key planning aim and should remain in the policy; if they need to applicants will have to demonstrate why they cannot meet this requirement
- Site allocations must indicate an estimated yield. The yield is based on a desktop analysis of site capacity, which is consistent across all the sites in the plan. Indicative yields do not indicate a maximum, and applicants may demonstrate that a higher number is acceptable in planning terms.

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (IN3)
- Access (IN3)
- Ecology (E15)
- Woodland, trees, hedgerows, TPOs (E15)
- Aquifer Source Protection Zones (E22)
- Landscape and Townscape (E10)

The following matters raised are considered in detail through the draft IDP:

- Education
- Health Care

## H26 - Land end of Palk Road

1 response was received regarding this topic

### Summary of key comments raised by residents and other stakeholders

A replacement site plan has been submitted.

Reference planning permission for temporary open storage use.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments.

In addition, consider minor wording changes and revised site boundary submitted.

## H27 - Helmsley House

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Objection to the site being developed for housing as it is unsuitable.

The site is outside of the urban area (Policies AL2 and CS17 of the Adopted Local Plan) forming a strategic green gap; development will lead to urban sprawl and set a precedent for further development.

Development would result in the loss of open spaces, countryside and natural habitats.

The site is currently in agricultural use.

The site is close to East Leigh House which is a Grade II listed building.

The site contains two Tree Preservation Orders (TPOs).

There is the possibility that bats (including the protected Bechstein's bat) forage and/or roost on the site.

The hospital and local schools are at full capacity and are unable to handle the estimated number of people from sites H17, H21, H25 and H27.

Support for the site being developed for housing.

Suggested wording change to paragraph 6.123 regarding greenfield/brownfield classification as the site is a residential dwelling and its curtilage. Residential curtilage in the countryside are classified under the NPPF as brownfield land; see *Dartford Borough Council v Secretary of State for Communities & Local Government (CO/4129/2915)*.

Suggestion that the site could accommodate more than 15 dwellings.

Suggestion that a quarter of the site could be used for a care home.

The landowner has no knowledge of landfill on the site.

The landowner has been agreeing the principles of a joint access road and drainage with the owners of the adjoining site (which has the benefit of planning consent).

Suggestion that the development should contribute towards high-quality multi-user links to Southleigh Forest and Southleigh (KS5).

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to:

- Include a requirement that high-quality multi-user links are established from the site to surrounding sites which provide clear routes to Southleigh (KS5) and Southleigh Forest.
- Include a reference to East Leigh House in the design and layout requirements (the listed building has only been referenced in the Site Opportunity and Constraints so far)
- Delete the reference that the site is greenfield and replace with alternative wording, such as "this is large housing in substantial grounds" rather than brownfield
- Include a care home and/or greater dwelling capacity

The following detailed matters are for consideration at the planning application stage and are covered by policies in the Local Plan:

- Protected Species (E18)

Comments where no change is considered necessary:

- The site is not in agricultural use; the site consists of a large house and its outbuildings (now converted into five flats) along with its curtilage

- The two TPOs, and the possibility of Bechstein's bat, have been highlighted in the site's opportunities and constraints (page 224) and have been referenced as part of the developer requirements
- The Council is proposing a renewed approach to the regeneration of brownfield land; however, it will not be possible to meet the Borough's housing needs from brownfield and greenfield sites in the Borough's existing urban boundary (Policies AL2 and CS17) alone. Therefore, sites outside of the existing urban area have had to be considered for development. This was addressed in the consultation on the Local Plan Housing Statement in 2016.
- The established network of natural habitats in the Borough will be outlined as part of the review on the Havant Borough Biodiversity Action Plan (BAP) which will be available in due course
- The current and future capacity of the local schools and health facilities have been reviewed as part of the Borough-wide Infrastructure Delivery Plan (IDP)

## H28 - Fathoms Reach

14 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Comments about Hayling Island infrastructure - please see table on 'Hayling Island (General)'

Object to the on-site open space requirement including community growing provisions (e.g. allotments).

The allocation will result in a net increase of 45 dwellings - need to account for net loss of 5 dwellings.

Object to demolition of existing houses to enable development.

Loss of greenfield site / greenspace.

Property owners bought their properties on the promise that the amenity land would never be built on.

Concerns in relation to access / disturbance to residents.

Loss of green / natural space - used by wildlife, dog walkers, for ground water storage.

Loss of ecology, habitats and protected species including Brent Geese.

The site is very close to a core site for migrating birds - concerns in relation to potential disturbance.

Site should not be included until evidence base is complete.

TPO areas, trees and hedgerows should be protected.

Fathoms Reach is narrow and twisty and is a hazard to both motorists and pedestrians.

Potential for archaeology.

Flood risk and increase of flooding elsewhere.

Concern that developer will not implement the scheme in accordance with approved details.

HCC supports criterion (d) (iii) of this policy. HCC would also expect this development to enhance Havant Footpaths 90, 93 and 94 which provide a sustainable travel link between St Mary's Road, Manor Road and Church Road.

All of the site allocations are small scale and therefore unclear how any improvements identified on the A3023 will be secured and delivered given the impact of each individual site is likely to be less than the cumulative impact.

Delete reference to 'using the Hayling Island microsimulation model' following Transport Assessment in site requirements because all proposed allocations will have already been included in the HBC microsimulation model runs to 2036. There is not a need for the developer to run the model again for the same site allocation. Query whether developer can be required to use a specific transport model.

### HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and in the Langstone area. At this stage, no site-specific matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The policy as proposed in the regulation 18 draft should proceed, with wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses.

In addition, consider how the policy may be amended to take account of the following:

- A review of the site capacity and consider whether it should be adjusted to take account of the net loss of existing dwellings (5)
- The proposed approach to the on-site provision of open space (E2) including the site threshold.

- The presence of a stream bounding the north and eastern boundaries should be referenced in the Site Constraints and Opportunities
- The site's location adjacent to a Core Area for Brent Geese and Waders (E17) should be referenced in the Site Constraints and Opportunities
- The addition of a requirement for a developer contribution towards the improvement of the above development where necessary in order to mitigate the impact of the development

The Council will further consider its proposed approach to applicants using the microsimulation model in preparing site-specific Transport Assessments.

The following detailed matters are for consideration at planning application stage:

- Access (IN3)
- Site specific impacts on Fathoms Reach (IN3)
- Residential amenity (E6 / E20)
- Ecology (E15)
- TPO areas, trees and hedgerows (E15)
- Archaeology (E9)
- Flood risk and drainage (E12 / E13)

Further evidence required:

Once the borough-wide Transport and Hayling Island Highway and Transport Infrastructure Assessments are completed, the draft IDP will be updated to reflect and incorporate the recommendations from the transport analysis. This will inform the Regulation 19 version of the Plan.

Comments where no change is considered necessary:

Whilst it is necessary to demolish a number of existing residential properties to provide access to the site, the site will make a significant contribution to the supply of new homes.

The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.

It is noted that property owners may have been assured by a previous landowner that the land would never be built upon. The current landowner of the site has however, since promoted the land for housing development.

The site is adjacent to a Core Area for Brent Geese and Waders as defined by Policy E17. A project level Habitats Regulation Assessment to inform any package of avoidance and mitigation measures has therefore reflected in the site requirements in the policy.

The site is located within Flood Zone 1, an area with less than 1 in 1000-year annual probability of sea or river flooding - concerns raised in relation to flooding are likely to be in relation to surface water flooding due to the presence of the stream along the north and eastern boundaries of the site. As above, an appropriate drainage strategy as part of any proposed development would be secured in accordance with the requirements of policy E12.

The implementation of an approved scheme is not a matter for the Local Plan but is dealt with by the development management process.

## H29 - Land North of Selsmore Road

19 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Comments about Hayling Island infrastructure - please see table on 'Hayling Island (General)'.

Issues in relation to the public footpath:

- Impact on public viewpoints - adjacent to the AONB
- Well used by children, elderly, visitors, tourists, and dog walkers
- Used as a route to local schools and college
- Health and wellbeing
- Maintain character and nature of footpath

Loss of greenfield site - brownfield sites should be developed first, loss of horse grazing paddock.

Impact on the character / identity of the area - there has been enough development within South Hayling.

Loss of greenspace / opportunities for recreation.

Impact on the local road network.

Safety of access - proximity to bend on Selsmore Road/Salterns Lane.

Concerns in relation to flood risk and drainage - run off from adjacent farmland, high water levels, waterlogged land. Photographs submitted.

Pollution risk to aquifer.

Presence of sewers in this location.

Concerns in relation to sewers including road works and maintenance of pumping station.

Impact on Brent Geese and Waders - recreational disturbance to the harbour. Photograph submitted.

Loss of habitats, wildlife corridors and protected species.

Proximity to Ramsar site.

Mature Oak trees on the site should be protected - replacement would not be acceptable.

Reference to the Site's Opportunities and Constraints.

Residential amenity issues:

- Loss of outlook
- Additional noise and disturbance associated with traffic
- Potential for light pollution
- Impact on quality of life
- Residential home backs onto the plot

Concerns in relation to the AONB:

- Loss of views
- Need to provide green buffer
- Threat of development
- Environmental impact during construction
- Ecological importance of mudflats
- Support 'respond to the site's sensitive landscape location, in particular the setting of the AONB' criterion

Capacity of the site should be reduced.

Concern that developer will not implement the scheme in accordance with the approved details.

The policy and supporting text do not acknowledge the impact of climate change on the site, which causes flood extent to increase significantly beyond the present-day Flood Zones. You should be satisfied this will not compromise the ability of the site to safely accommodate the number of dwellings proposed.

HCC requests the retention of Havant Footpath 102 which runs along the western boundary of this site. In addition, there is an aspiration to upgrade the footpath to a multi-user route to provide a safe route to Mengham Junior School. HCC therefore request that this allocation provides a developer contribution towards this.

All of the site allocations are small scale and therefore unclear how any improvements identified on the A3023 will be secured and delivered given the impact of each individual site is likely to be less than the cumulative impact.

Delete reference to 'using the Hayling Island microsimulation' following Transport Assessment in site requirements because all proposed allocations will have already been included in the HBC microsimulation model runs to 2036. There is not a need for the developer to run the model again for the same site allocation. Query whether developer can be required to use a specific transport model.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage.

No site-specific matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. However, given that the impact of climate change means that the extent of present day Flood Zones are expected to increase significantly, flood risk constraints will be considered further through Phase 2 of the Strategic Flood Risk Assessment (SFRA). The policy as proposed in the regulation 18 draft should proceed, with wording changes and revisions to reflect and incorporate the recommendations from the transport analyses and the SFRA. In addition, consider the following:

- Subject to overwintering surveys in 2018/19 to establish whether SPA birds use the site, the inclusion of relevant policy criteria according to the level of impact on Solent Waders and Brent Geese, including the need for any mitigation in line with policy E17.
- Include reference to retention of existing footpath (102) which runs along the north-eastern edge of the site boundary. Also reference the opportunity to enhance this route in the Site Opportunities & Constraints, and consider whether a developer contribution to improve this route is necessary in order to make the development acceptable in planning terms.
- Examine the presence of sewers/sewer lines in this location and investigate the implications for the site capacity.
- Investigate the quality and value of the mature oak trees on the site. Policy E15 also requires the development to be informed and influenced by the presence of trees and woodlands on the site.

The following detailed matters are also considered at planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (IN3)
- Access (IN3)
- Ecology including Ramsar designation (E15)
- Flood risk and drainage (E12 / E13)
- Residential amenity (E6 / E20)
- Aquifer Source Protection Zones (E22)

The Council will further consider its proposed approach to applicants using the microsimulation model in preparing site-specific Transport Assessments.

Comments where no change is considered necessary:

The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.

The loss of a view is not a material consideration in decision-taking.

The implementation of an approved development is not a matter for the Local Plan but is dealt with by the development management process.

## H30 - Northney and Sparkes Marina

9 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Impact on the AONB:

- Object to allocation
- Site occupies a highly visible promontory within Chichester Harbour AONB.
- Buildings would be intrusively visible
- early consultation with Natural England and the Chichester Harbour Conservancy should take place to identify whether the landscape and ecological sensitivities can be addressed
- Key factor affecting the impact on the AONB is the scale of the development
- The principles of the required mitigation should be fully considered prior to the site's allocation.
- Paragraph 116 states that planning permission should be refused for major developments in AONBs except in exceptional circumstances and where it can be demonstrated they are in the public interest. The circumstances here are not exceptional or in the public interest.
- Recreational usage will adversely impact the landscape, scenic beauty and wildlife habitats

#### Impact on wildlife:

- Site is adjacent to Ramsar site and SSSI
- Policy appropriately highlights that this site is immediately adjacent to the SPA
- Policy appropriately highlights the proximity of sites identified in the Solent Brent Goose and Wader, but update of the Solent Brent Goose and Wader Strategy (2017) should be used for most up to date data, to meet requirements of criteria (e) and (m)
- Object to allocation on basis of ecological impacts on the various international, European and national nature conservation designations which surround the site; development would result in a significant increase in recreational disturbance, which would require significant mitigation and avoidance measures
- Development here would lead to disturbance during construction and recreational disturbance during occupation; suggestion that this could not be mitigated adequately to conserve the integrity of designated sites.
- Criteria e and i are currently the same; one should be changed to refer to the need to adhere to Policy E16 on disturbance mitigation
- Setting back the buildings (Criterion d.ii) would not necessarily help reduce disturbance - it would depend what was between the property and the foreshore. Best deterrent to use of the foreshore would be thick planting.

#### Loss of current uses (leisure and marine employment):

- Loss of amenities / 40 houses at Northney Marina must impact on the primary function and operation of the site for marina purposes.
- Object based on / concerned about the potential loss of marine employment (see Conservancy's Planning Principle PP02 'Safeguarding Marine Enterprise', together with the Marine South East report 'Chichester Harbour Marine-related Business Evaluation (2013)')
- Concerned about the potential loss of access by other water users

#### Flood Risk:

- Access to Northney Marina is at risk from flooding
- At Sparkes, the scope of development must be limited to repairs and sensitive flood protection
- Sparkes Marina: Any improvements planned to the sea walls may require a Flood Risk Activity Permit, and will need to be considered strategically in conjunction with other planned improvements in the vicinity
- The site lies in FZ1, but due to the susceptibility of the site to sea level rise, a progressively greater proportion of the site is at a high probability of flooding over the next 100 years. The Access is in FZ3. It may be possible to implement mitigation measures on site, using a combination of the sequential approach, land raising, construction of sea walls and building design, to manage risk to an acceptable level. It is, however, very likely that the site will be inaccessible during high tides.

The identified constraints and opportunities are acknowledged, and it is believed that the policy strikes a sensible and pragmatic balance between retaining and enhancing both marinas and making more efficient use of these brownfield sites.

Ground at Northney is largely dumped infill, and would need much remedial work to ensure trees were able to grow and survive.

Question the logic of the argument that the development would fund the refurbishment of the marina and repairs to the sea wall at Sparkes Marina.

Any building will cost a small fortune - it's an upmarket prime building site.

Traffic issues at both sites - access via narrow residential streets to Sparkes Marina particularly of concern.

HCC would like to see a footpath between Northney Marina and the surrounding rights of way and permissive network.

Support inclusion of policy H30 in the Plan.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

The Council is aware of the site constraints but has had to consider the site allocation given the high housing need. Nevertheless, the Council will further consider the suitability of the site for development, particularly regarding the impact on the AONB, the Chichester & Langstone Harbours SPA and flood risk.

The Draft Local Plan indicates there are sufficient sites to accommodate the need for housing together with a reasonable buffer. This would not change if this site (and others where the principle of residential development is being further considered) is not allocated. On this basis, it is appropriate to further consider the principle of residential development on this site after further discussion with the relevant statutory stakeholders has taken place.

Nonetheless, should the allocation in principle move forward, these matters (impact on AONB, impact on SPA, flood risk) will be revisited to inform any detailed changes which should take place to the policy text.

## H31- Sinah Lane

17 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Comments about Hayling Island infrastructure - please see table on 'Hayling Island (General)'.

Concerns over flooding and drainage:

- Water logged during the winter months / sustained period of bad weather
- Question effectiveness of flood devices which are designed to monitor flooding
- Site marginally above the Spring Tides high level water line
- Tidal movement below the surface which means that soakaways do not function
- The Billy trail restricts water distribution acting as an inland dam
- Development will potentially push surface water to the west and south towards existing properties.

Within an area subject to coastal erosion / close to foreshore which is not protected from sea egress

Issues in relation to the proposed SuDs solution:

- Concern in relation to pumping station and its maintenance and how the costs for this will be met
- Presence of mosquitos with large bodies of stagnant water
- Treatment of water with insecticide and related health concerns, given concerns at the Goldring Close development
- Concerns in relation to pollutants and related impact on wildlife
- SUDS need to be elevated above ground and water pumped to it, within the northern part of the site.

Concerns in relation to Brent Geese:

- Loss of a Primary Support Area
- Site should be categorised as a Core Area - concern that bird scarers were used to influence the results of surveys
- Site part of the mitigation strategy for the Oysters development - should be continually used for crop rotation to prove for the foraging and roosting of Brent Geese
- Fence has not been maintained to prevent dogs from disturbing wildlife -previously reported as a breach of an agreement by that developer.
- An appropriate mitigation solution should be secured in accordance with Policy E17

Impact on ecology and protected species.

Adjacent to AONB, SPA, Ramsar and SSSI.

Loss of grade 2 agricultural land / impact on the viability of the farm.

Loss of open space / area and views to the countryside - should be for all to enjoy not the chosen few.

Mains water pressure low.

Inadequate parking for non-resident vehicles.

Concern in relation to extra traffic going through West Lane / existing residential area.

There has been a significant increase in the amount of traffic on Manor Road - queues can last for several hours during the summer and school holidays.

Proposed development will cause most travellers to use West Lane which is a narrow country lane with hidden bends. It was never designed to cope with the proposed level of traffic.

Concerns in relation to highway safety:

- Single access crosses a pedestrian pavement on Sinah Lane,
- Roads and pavements to West Town and schools are narrow / do not have pavements
- Access would be via a single relatively narrow access between existing properties

There is no need for the development - the Oysters development has still not sold out. Developers should be challenged to develop existing sites where they have permissions first.

Development will not meet local housing need - questionable as to whether first time buyers will be able to afford the price.

Just because landowner wants to sell field it does not automatically make the land suitable for development.

Design of houses does not cater for large retired community customer base.

Proposed development out of character with the area - concern in relation to high proportion of terraced and semi-detached houses at a density of over 30 dwelling per hectare.

Query what type of properties are to be built in the Station Road area

Limited facilities and services in West Town - cannot cope with proposed 160 houses in Sinah Lane.

Potential for archaeology - Roman remains used in the construction of St Marys

There are no heritage assets within the site - a Heritage Statement is not required.

The Council should not insist on the use of the microsimulation model until it has been finalised, appropriately consulted upon and found to be robust.

All of the site allocations are small scale and therefore unclear how any improvements identified on the A3023 will be secured and delivered given the impact of each individual site is likely to be less than the cumulative impact.

Delete reference to 'using the Hayling Island microsimulation' following Transport Assessment in site requirements because all proposed allocations will have already been included in the HBC microsimulation model runs to 2036. There is not a need for the developer to run the model again for the same site allocation. Query whether developer can be required to use a specific transport model.

No early years or related infrastructure has been included.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage. No site-specific matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The policy as proposed in the regulation 18 draft should proceed, with minor wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses.

Part of the mitigation proposal for the Oysters site was to repair the broken fence line along the eastern side of H34C to prevent local residents walking their dogs through the field and disturbing geese. As such, there will be a requirement for any pedestrian and cycle route to take account of the potential disturbance to birds during the winter months. This should be possible provided the pedestrian and cycle route does not adjoin or pass through land to the north of the allocation site (H34C), and thereby avoiding potential disturbance to birds.

The Council will further consider its proposed approach to applicants using the microsimulation model in preparing site-specific Transport Assessments.

The following detailed matters are for consideration at planning application stage:

- Surface water, SuDs and drainage (E12) and associated maintenance (IN3)
- Solent Brent Goose and Waders (E17), as above.
- Ecology and protected sites (E15)
- Highway safety and parking (IN3)
- Design and layout (E6)
- Housing density and mix (H3)

The capacity of water supply, health and community facilities are considered in detail through the draft IDP.

Comments where no change is considered necessary:

The site is grade 3a agricultural land. When considering which greenfield sites are suitable for allocation, the council has sought to prioritise sites of a lower agricultural quality. However, the available evidence is that the majority of land in the borough is of the best and most versatile quality (BMV). Therefore, the allocation of housing sites on BMV is unavoidable if the borough is to meet its housing need. In order to offset the loss of BMV, the policy identifies a need for the development to include community growing provisions such as allotments as part of the open space provision.

The Council considers that Hayling Island is adequately served by services and facilities, albeit further provision could help to serve the community.

In meeting the borough's housing needs, policies H2 and H3 set out the Council's approach to securing homes of the right size and tenure, whilst Policy E7 sets out how the Council will secure suitable homes for a wide range of occupants.

Concerns raised in relation to surface water flooding due to the complex drainage system and coastal change referenced in the Site Constraints and Opportunities. Whilst an Area of Coastal Change (as defined by E14) lies immediately north of the end of North Shore Road, the site itself is not considered to be vulnerable to coastal change.

Detailed matters in relation to SuDs, including concerns in relation to mosquitoes and the use of insecticides, would be considered as part of any management plan and any associated management regime. As above, the Draft Local Plan includes a policy (IN4) sets out the proposed approach to the sustainable management and maintenance of such 'common parts'.

The site does not form part of the mitigation strategy for the Oysters development. Further overwintering surveys will confirm the intensity of the use of the northern part of H34c relative to the south (which includes the site allocation). In this respect, the developer will be required to provide suitable mitigation to the north of the allocation site in line with the site requirements and Policy E17. A comprehensive strategy for the creation of a Brent Goose refuge on the western side of Hayling Island will be considered further through the Council's emerging Biodiversity Strategy.

There is potential for previously unidentified archaeology of prehistoric and Roman date to be present on the site.

The capacity and future growth of early years infrastructure is considered through the Borough-wide draft IDP.

## H32 - Land north of Tournerbury Lane

12 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Comments about Hayling Island infrastructure - please see table on 'Hayling Island (General)'.

Proposes amendment to extend site allocation boundary.

Concerns in relation to the AONB:

- Impact on its setting
- Southern part of the site could form landscape buffer
- Impact on views from the public footpath
- Not possible to mitigate the impact of development

Set a precedent for development on land to the north.

Impact on Brent Geese and Waders:

- Reduced foraging options
- Need to protect these areas
- Disturbance to the SPA could not be adequately mitigated

Natural England supports policy requirement that mitigation for the Solent Waders and Brent Geese is provided upfront, prior to development and to the satisfaction. Mitigation is also required to address the indirect impacts on nearby Solent Wader and Brent Goose sites.

Concerns over flood risk and drainage:

- Soakaways have not had any effect on flooding
- Existing watercourses would find it difficult to cope
- Fields/areas around the Eastwood Close/Tournerbury Lane junction subject to flooding

Issues in relation to Tournerbury Lane/Church Lane junction:

- Over capacity with existing traffic
- Splayed junction does not lend itself to traffic light control
- Congestion exacerbated by delivery lorries to the Co-Op
- Additional traffic from the Halyards and Hayling Billy sites

Impact on protected species and habitats.

Archaeological potential.

Question whether social rented housing should be included.

Loss of greenfield site - brownfield sites could be developed first.

Storage of materials and builder's lorries and contractor parking will be an issue.

HCC support criterion (d) (iv) of this policy. There is an aspiration to upgrade Havant Footpath 88 to a multi-user route providing a sustainable travel link to the schools to the north.

All of the site allocations are small scale and therefore unclear how any improvements identified on the A3023 will be secured and delivered given the impact of each individual site is likely to be less than the cumulative impact.

Delete reference to 'using the Hayling Island microsimulation' following Transport Assessment in site requirements because all proposed allocations will have already been included in the HBC microsimulation model runs to 2036. There is not a need for the developer to run the model again for the same site allocation. Query whether developer can be required to use a specific transport model.

### HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains

uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage. No site-specific matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The policy as proposed in the regulation 18 draft should proceed, with minor wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses.

In addition, consider the following:

- Examine whether the site allocation boundary should be amended to reflect amended site plan submitted by the landowners' agent, including the opportunity to provide a buffer to the setting of the AONB.
- Reference opportunity to enhance footpath on the western boundary of the site in the Site Opportunities and Constraints.
- Whether there is a need to include a requirement for a developer contribution towards the indirect impacts on nearby Solent Wader and Brent Goose sites.

The Council will further consider its proposed approach to applicants using the microsimulation model in preparing site-specific Transport Assessments.

The following detailed matters are for consideration at planning application stage:

- Brent Geese and Waders (E17)
- Flood risk and drainage (E12)
- Site specific impacts on the local road network (IN3)
- Ecology (E15)
- Archaeology (E9)

Comments where no change is considered necessary:

Policy E10 sets out the exceptional circumstances in which the Council will permit development outside of the defined settlement boundaries (Figure 18) which will be refined further through the Regulation 19 version of the HBLP2036. Should the Council decide to amend the site boundary as per the submitted site plan, this will be publicised through the Pre-submission consultation.

Affordable housing should be secured as part of market housing-led schemes in accordance with policy H2 to achieve a mixed and balanced community.

The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.

Details of construction and associated arrangements are generally dealt with by the development management process.

## H33 - Manor Nurseries

7 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for the development.

The loss of trees, hedgerows and other green infrastructure has a detrimental effect on the landscape and wildlife. This creates a negative impact on the unspoilt nature of Hayling Island.

A mature tree has recently been felled.

Development of the site will result in the loss of agricultural land.

Insufficient weight has been given to infrastructure constraints - particularly road infrastructure.

The access to the site will be on a narrow B-road which is used by nursery children and elderly people visiting the church.

The density of the site proposed development is too high and should be halved.

A multi-user access route between Manor Road and West Lane should be provided.

Delete reference to 'using the Hayling Island microsimulation model' following Transport Assessment in site requirements because all proposed allocations will have already been included in the HBC microsimulation model runs to 2036. There is not a need for the developer to run the model again for the same site allocation. Query whether developer can be required to use a specific transport model.

### HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage. No site-specific matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The policy as proposed in the regulation 18 draft should proceed, with wording changes and revisions to reflect and incorporate the recommendations from the transport analyses. In addition, consider whether:

- A multi-user access route should be required to link Manor Road and West Lane

The Council will further consider its proposed approach to applicants using the microsimulation model in preparing site-specific Transport Assessments.

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (IN3)
- Access (IN3)
- Ecology (E15)
- Woodland, trees, hedgerows, TPOs (E15)

Comments where no change is considered necessary:

- The allocated density of the site is in line with Policy H3 which seeks to ensure efficient use of land for development
- When considering which greenfield sites are suitable for allocation, the council has sought to prioritise sites of a lower agricultural quality. However, the available evidence is that the majority of land in the borough is of the best and most versatile quality (BMV). Therefore, the allocation of housing sites on BMV is unavoidable if the borough is to meet its housing need

## H34 - Cabbagefield Row

3 responses were received regarding this topic

### Summary of comments raised by residents and other stakeholders

Proposed amendment to site boundary to include land to the north which could be used to help facilitate on site open space and ecological mitigation.

No early years or related infrastructure has been included.

Site should provide a multi-user link to Bridleway 121 and to Calshot Road.

Request that a contribution is paid to Hampshire County Council (HCC) towards enhancing the nearby Staunton Country Park to mitigate for increased recreational pressure.

There needs to be some text or new heading before this allocation as it is not on Hayling island but follows on directly from the Hayling sites.

Also need to check that the site meets the highway boundary.

Given the proximity of the site and its potential impact on the SRN, either individually or cumulatively, it is requested that any potential adverse impacts to the safe and efficient operation of the SRN be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft. In addition, consider the following:

- Investigate proposed site extension further. If site extension is deemed appropriate, then some minor wording changes will be necessary.
- Whether the policy should be amended to require links to Bridleway 121 and to Calshot Road
- Whether the policy should be amended to add to the developer requirements that a contribution is paid towards enhancing the Staunton Country Park in line with HCC's request
- State that any adverse impact on the SRN is considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013
- Check site meets the highway boundary.

Comments where no change is considered necessary:

The capacity and future growth of early years infrastructure has been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP).

## H35 - Former Colt Site, New Lane

1 response was received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Welcome development of 90 homes and employment space.

Social housing supported.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments.

## H36 - Dunsbury Way

4 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

No objection to the land being developed in principle.

Objection to the site being developed into a waste landfill site.

Support for the proposed allocation.

In 2006, residents who moved into the surrounding Proctor & Gamble redevelopment were informed that the site would be used for a GP surgery and nursery. Suggestion to build a new GP and/or dental surgery instead of residential dwellings.

The estate is *"like a concrete stranded whale as it is"*.

Objection to high-rise development of any kind.

Suggestion that any buildings over two storeys are situated closest to Dunsbury Way, along with any development near Little Hackets to be orientated to the side or opposite direction of the existing dwellings, as to not overshadow or overlook existing properties.

Suggestion for the provision of affordable housing to be situated along Dunsbury Way.

Support for retirement homes; preference for privately-owned retirement dwellings.

Observations of wildlife on the site, i.e. foxes, birds and bats.

Observation of noise pollution at present (i.e. working man's club).

Observation of anti-social behaviour at present.

Concern over medical impact the development would have on the community.

Concern that 70 dwellings is too much for the size of the land.

Questions raised by the landowner over the extent of the proposed boundary; recommendation to check for accuracy on the north-east side.

Request that a contribution is paid to Hampshire County Council (HCC) towards enhancing the nearby Staunton Country Park and Havant Footpath 502 to mitigate the increased recreational pressure.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The Council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. The policy should be amended to:

- Show the correct boundary, as stated by the landowner, in Figure 58.

In addition, consider whether the policy should be amended to:

- Include the requirement of a developer contribution (paid to HCC) for the enhancement of Staunton Country Park and Havant Footpath 502.

The following detailed matters are for consideration at the planning application stage and are covered by policies in the Local Plan:

- High Quality Design (E6) regarding reduced opportunities for anti-social behaviour, along with density, scale and appearance of development in respect of the surrounding area
- Ecology (E15) regarding wildlife observed on site
- Amenity and Pollution (E20) regarding noise pollution
- Affordable Housing (H2)
- Housing Density and Mix (H3)

Comments where no change is considered necessary:

- The land is not proposed for the development of a waste landfill site
- GP provision and future growth have been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP)
- Affordable housing should be evenly spread across a site and integrated with the rest of the development (in line with Policy H2)
- Retirement housing products also need to provide affordable units in line with Policy H2

## H37 - Riders Lane

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support for allocation.

Has been previous permission from Government for re-provision of statutory (but unused) allotments. This was as an extension of Stockheath allotments (south of the site). As such, policy should be updated to state that allotments could be provided wholly or partly of-site in the vicinity of the development.

Loss of biodiversity.

Land contaminated with asbestos.

Local issues with foul water drains.

Riders Lane South very narrow with unsafe turning onto Purbrook Way

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider the following:

- Whether replacement allotments could be provided close to the site
- Whether the policy should include specific reference to asbestos contamination

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Ecology (E15)
- Drainage (E13)
- Transport mitigation (IN3)

## H38 - Former SSE Offices, Bartons Road

1 response was received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Supportive of revised mixed-use allocation (reflecting the strong commercial interest in the site).

Request flexibility within the policy to allow for other employment generating uses and/or housing – need to allow flexibility for a variety of economic development to come forward to create further jobs. Suggested changes to the criteria in the policy to reflect this.

Allowing non-housing uses coming forward on the site would not lead to adverse implications in respect of five-year land supply or in meeting the overall housing need over the Plan period.

Non-housing uses on this longstanding employment site would sit better with the proposed builders' merchant.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider whether the policy should be amended to include:

- An allocation wholly for employment purposes (Classes B1, B2 and B8) including the builders merchant) considering whether such an allocation is likely to be more deliverable than for a mixed-use allocation.

As part of this, it will be necessary to further investigate the site's potential contribution to the development needs of the area.

Comments where no change is considered necessary:

As currently defined within the NPPF, 'economic development' includes those within B Use Classes, public and community uses, and main town centre uses (but excluding housing development). It is therefore considered that an allocation for 'economic development purposes' would result in an overly permissive site allocation. As above, however, it is considered appropriate to consider whether the site should be allocated wholly employment purposes.

## H39 - Strouden Court

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The policy is supported and no modifications are suggested.

Amend the reference in the Site Opportunity & Constraints to state that site is in SPZ 1c for Havant & Bedhampton Springs.

Request that a contribution is paid to Hampshire County Council (HCC) towards enhancing the nearby Staunton Country Park to mitigate for increased recreational pressure.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to include a contribution towards enhancing the Staunton Country Park in line with HCC's request.

## H40 - Land at Oakshott Drive

2 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The site was previously identified for housing but historically not taken forward by the landowner due to location of underground utilities and the potential negative impact on site capacity.

Support for the proposed allocation subject to an increase in potential capacity.

Suggestion of a three-storey flatted scheme, consisting 10-15 units.

Potential constraints include the cost of diverting both the existing footpath and underground utilities.

Request that a contribution is paid to Hampshire County Council (HCC) towards enhancing the nearby Staunton Country Park to mitigate for increased recreational pressure.

### HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the Havant Borough Open Space and Play Pitch Strategy which is underway. As such, there remains uncertainty as to whether the loss of open space may be an overriding constraint to development of this site at this stage. At present, no site-specific matters have been raised which indicate the site is not deliverable or should not be allocated in the HBLP 2036. The policy as proposed in the regulation 18 draft should proceed, with wording changes, and revisions to reflect and incorporate the recommendations from the Open Space and Play Pitch Strategy once it is available. The policy should be amended to:

- Reflect that the site was allocated in the Local Plan (Allocations Plan) under reference L46
- Highlight the underlying sewage/waste water infrastructure in the Site Opportunities & Constraints

In addition, consider whether the policy should be amended to:

- The revised proposal for a three-storey flatted scheme, consisting 10-15 units
- Add to the developer requirements that a contribution is paid towards enhancing the Staunton Country Park in line with HCC's request
- Add to the developer requirements that the footpath is diverted

## H41 - Land East of College Road

XXX responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Principle of development

Support for inclusion of the site - it is deliverable within the plan period. No showstopping constraints, majority of the units can be delivered in the plan's first five years.

Development should be reduced in size with more consideration given to retaining open space and views.

There is a rush to develop the site, was originally indicated as coming late in the plan programme.

Will be to detriment of local environment and everyday life of existing residents.

Site's capacity should be increased to in around 700 units - 560 units would be 20dph and conflicts with H3.

Should have development surrounded by woodland rather than a woodland surrounded by development.

#### Infrastructure

It is requested that any potential adverse impacts to the safe and efficient operation of the Strategic Road Network (SRN) be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

Only slightly smaller than the statutory need to provide a 1FE primary school.

Welcome the approach in the policy regarding education infrastructure. However supporting text should be updated to ensure complete consistency with the IDP, which states that Morelands School can expand to 3FE. The next version of the Local Plan should reflect the latest position agreed with Hampshire County Council.

Doctors surgery at Crookhorn already at capacity, as is Queen Alexandra Hospital.

Improvements will be needed to the transport infrastructure.

Where is the access road going to be?

Suggestions proposed for improving traffic flow in the local area to increase highway capacity.

What leisure facilities will be available to counteract any antisocial behaviour?

What employment prospects will there be for new residents?

Capacity check shows no need for water main reinforcement.

Lack of attention to education, particularly secondary.

Infrastructure to be delivered comprehensively - this should include early years.

Havant Footpath 26c and Havant Bridleway 28 (Scratchface Lane) pass through this site. Allocation should require the retention and enhancement of these routes. A high-quality multi-user route going east-west should be provided, linking College Road to Bridleway 28. Request that the allocation provide a contribution towards achieving a multi-user route from Bridleway 28 down to Portsdown Hill Road, which is an aspiration of the Hampshire Countryside Access Plan.

#### Landscape and heritage

It is a greenfield site which will result in significant change to the landscape of the area.

Will have a negative effect on the rural character of the area and the special nature of Portsdown Hill.

Landscape already partly degraded. Requires even more restraint to maintain what remains of its scenic, wildlife and historic value.

There will be no differentiation between Waterlooville, Portsmouth and the surrounding areas.

Developers should be subject to guidelines to make sure that the proposed development is not a blot on the landscape.

Do not consider the site to be on Portsdown Hill or particularly visually sensitive given that views in and out of the site are not prevalent.

Site is within the setting of Fort Purbrook Scheduled Ancient Monument. Any harm should ideally be avoided but certainly requires clear and convincing justification in the form of overriding public benefits. The relationship of the Fort to the area to the north, the anticipated direction of attack, is an important element of its significance. A detailed assessment of the contribution of the Fort and the likely impacts of development the Fort and its significance needs to be undertaken. This was previously requested before identifying any development areas in the vicinity of the Fort. As such, object to this allocation until such a detailed assessment has been undertaken and confirmed the proposed allocation would not have an unacceptable impact on the significance of Fort Purbrook.

### **Retail**

Demographics of the area and proximity of other stores has led to no interest in convenience stores.

### **Ecology**

Only part of the site is designated as a primary support area for Solent Waders and Brent Geese, other parts of site are secondary and low-use.

Site is a Primary Support Area for Waders and Brent Geese. Appropriate mitigation needs to be secured in line with E17.

Natural England strongly recommends a comprehensive ecological mitigation strategy (covering protected species and wider wildlife) is secured for the site that achieves net biodiversity gain. This should use a DEFRA metric to quantify the change in habitats at the site. Strategy will need to ensure the remaining wildlife areas and green infrastructure are significantly enhanced and support the wider ecological network in the Borough.

Early consultation with Natural England with regard to the site is recommended.

### **Open space**

Improvement needed to the recreation facilities opposite South Downs College.

Gardens should be large enough for children to play.

Play area to be sited centrally.

### **Littlepark Wood west**

Littlepark Wood west and Scratchface Lane trees should be protected as a nature reserve. Should not be part of the H41 area for urban extension. Gundrymoor Woods depends on the undisturbed link through these woods to Campdown.

Questions whether the part of the site north of Scratchface Lane is deliverable given its wooded nature.

Littlepark Wood and Scratchface Lane should not be used for development.

### **Constraints**

Site is in a sensitive location for archaeology and ecology.

Preserve existing trees and hedgerows on the site - disappointing that mature oaks already felled.

Pre-application response from Hampshire County Council's Minerals and Waste team highlights that there is only a small amount of mineral resource in the south of the site that is not of significance. This part of the policy should be removed.

The roman road does not have the same designation status as the roman villa. Reference to "enhancing" the site of the villa should be replaced with "responding". This will better reflect the approach in the latter part of the policy.

A roman road crosses the site. Development presents an opportunity to maximise the potential of the Roman villa and road. Not enough to defend the status quo.

### **Implementation of development**

Evidence that mitigation has been undertaken should be published. Should be checked when development is completed and a register kept by HBC. Information should be reported.

Impossible for developer of this site to influence timing and delivery of infrastructure on sites outside of its control. Could lead to a delay in the site coming forward. The section on coordination with nearby sites should be removed.

### **Flood risk**

Purbrook area is subject to local flooding and drainage issues - plans needed to make sure that development will not have a detrimental impact.

Site is in catchment for Bedhampton Brook, a 'main river',

### **Sports facilities**

There is no evidence to justify these facilities on the site. Recommend that this part of the requirement is removed.

Precious space should not be wasted on more sports facilities. There are some on the other side of College Road.

### **Other matters**

Questions whether any of the site was formerly used for landfill.

Planning applications should go to Chichester Harbour Conservancy and Langstone Harbour Board.

A foul water sewer crosses the site from Crookhorn to Bedhampton.

## **HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider the following:

- The status of Littlepark Wood in the plan and the overall site boundary
- The precise site area and any impact on the proposed residential yield of the site
- Whether the allocation should be specific about the location of access(es) and, if necessary, emergency access(es) to the site together with the wider coordination of infrastructure with nearby development sites
- Whether reference should be made to replacement of mature trees already felled
- Whether opportunities for prior extraction of minerals is still necessary following the further advice from Hampshire County Council Minerals and Waste team
- Whether references to the Roman villa and road should be amended
- The allocation as drafted would not prevent the site coming forward separately to other nearby sites. However, it is necessary to require the infrastructure impact to be considered in combination with other nearby sites. This is logical given the amount of development proposed in the Purbrook area. However, consideration should be given to changing "delivered comprehensively" to "assessed in combination"
- Clarify if necessary the potential for presence of landfill
- Clarify utilities which run across the site
- Whether references to the expansion of Morelands School need to be updated to reflect the latest position, bearing in mind that if for whatever reason the expansion is not completely possible, land may be required on this development site for a new school.

- Whether the submission of the 'ecological assessment' should be updated to an 'ecological mitigation strategy' in line with Natural England's suggestion.
- Whether any references to the management and mitigation of the development on the SRN are needed, following completion of the Borough Wide Transport Assessment.
- Whether specific reference to the nearby rights of way and the inclusion of an east-west route should be included
- Whether the development creates a need for a contribution towards achieving a multi-user route from Bridleway 28 down to Portsdown Hill Road.

Comments where further evidence is needed:

- Request detailed evidence of the marketing that has taken place for a convenience stores from the prospective developer in order to make a reasoned judgement as to whether this element of the allocation should remain.
- Following the completion of the Playing Pitch Strategy, a decision can be made as to whether there is a definitive need for new sports facilities on this site.
- The scale and location of mitigation for Solent Waders and Brent Geese should be clarified following further assessment and the publication of the Solent Waders and Brent Goose Strategy.
- Liaise directly with Portsmouth Water regarding the need for mains reinforcement.

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Drainage (E13)
- Site specific impacts on the local road network (IN3)
- General ecology (E15)
- Woodland, trees and hedgerows (E15)
- Transport mitigation (IN3)
- Design (including gardens) (E6)

Comments where no change is considered necessary:

The need for employment development is addressed through the Employment Land Review. This examines the sites available and their suitability for employment. There are sufficient available sites to accommodate the need for employment development in the Borough up to 2036.

The impact on the Borough's infrastructure networks is being comprehensively assessed through the Infrastructure Delivery Plan. This shows that there are deliverable solutions regarding early years, healthcare and primary education. The impact on secondary education of proposed development can be accommodated within the Borough's existing schools. For primary education, this would involve the expansion of Morelands School.

Leisure facilities are proposed within the Borough's town centres of Waterlooville and Havant as well as in a specific allocation at the former BAE Systems Park (C9). This is considered sufficient and concentrates leisure provision in the most accessible parts of the Borough.

The proposed location and its visual sensitivity requires the submission of a Landscape and Visual Impact Assessment and that the site responds to its sensitive location in landscape terms. It is appreciated that the development of the site will inevitably lead to a loss of a large amount of greenfield land, however this is necessary in order to meet the need for development in the Borough.

The Local Plan cannot influence when the site is likely to come forward.

Policy E15 already recommends early engagement with Natural England across the Borough. It is not necessary to repeat that for single allocations. It should be noted that there has been significant engagement with Natural England on this allocation prior to its publication.

Mitigation required under S106 agreements is already monitored (and the developer pays for this) and a completion notice issued where it has been confirmed that the mitigation has been completed in compliance with the relevant details. Completion notices are already made public. Similarly, mitigation secured by a planning conditions is monitored through the development management process. Where details of mitigation are supplied in compliance with the details of the condition a discharge of condition notice is issued. Discharge of condition notices are already made public. Should it be ascertained that conditions have not been correctly implemented, this will be investigated and appropriate action taken through the Council's Planning Enforcement Service.

## H42 - Woodcroft Farm

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

No early years or related infrastructure has been included.

It is expected that Havant Bridleway 1b (through the site), Restricted Byway 523 (eastern boundary) and Denmead Bridleway 42 (western boundary) are retained and enhanced.

It is requested that a contribution is paid to Hampshire County Council (HCC) towards works at Horndean BOAT 46.

Suggestion that one of the 2 bridleways or BOAT 46 is opened for cycling.

Suggestion of a cycle link to Victory Avenue so to complete the route to Horndean Town Centre.

Suggestion of cycle connections from the site to Horndean and Cowplain Secondary Schools, along with Waterlooville Town Centre.

Comment that Milton Road has a good quality cycle route to Hambledon Road providing connections to Berewood and Waterlooville Town Centre from National Cycle Route 222.

Support for a planned cycle link on Milton Road between Lovedean Lane and Hartplain Avenue as shown on the Havant Borough Cycle Network Map 2017.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to:

- Retain and, where possible, enhance Havant Bridleway 1b, Restricted Byway 523 and Denmead Bridleway 42.
- Include a developer contribution towards works at Horndean BOAT 46.

Comments where no change is considered necessary:

Regarding the suggested cycle connections outside of the site, in parallel with the Local Plan the Council are bringing forward the ongoing development of the Borough's cycle network via Community Infrastructure Levy (CIL) and other funding sources available. These suggestions will be considered in the future but will not be directly outlined in the Local Plan. Please note, that there are no plans to provide a signposted cycle network link at present along Milton Road (between Hart Plain Avenue and Lovedean Lane); the Havant Borough Cycle Network Map 2017 currently highlights this section of road as a "suggested route" for cyclists.

Finally, the capacity and future growth of early years infrastructure has been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP).

## H43 - Blue Star

5 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The revised policy is noted and supported.

The removal of the site from Waterlooville Town Centre's boundary, in order to allow residential development, is supported.

As the site is in a transitional area between Waterlooville Town Centre and Berewood, along with its location within the 300m "edge of centre" buffer zone around the town centre, it is suggested that a higher development potential of at least 150 dwellings, calculated from 75 dph (dwellings per hectare), may be appropriate in order to maximise the potential of the land.

The site is in a highly sustainable location with the potential to provide links between Waterlooville Town Centre and Berewood.

Criterion cii) is supported as the MDA (Berewood) has inadequate cycle access to the town centre. Further suggestion of a split-level access from the site to the town centre as to encourage cycling.

Amend the reference, regarding SPZs, in the Site Opportunity & Constraints to state that site is in SPZ 1c for Havant & Bedhampton Springs.

No early years or related infrastructure has been included.

The development should retain and enhance Havant Footpath 11 and upgrade it to a multi-user route if possible.

It is requested that any potential adverse impact to the safe and efficient operation of the Strategic Road Network (SRN) is appropriately considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. The policy should be amended to:

- State the correct SPZ 1c category for Havant & Bedhampton Springs
- Remove the reference to Policy H50 as this site was discounted in the Sustainability Appraisal

In addition, consider whether the policy should be amended to:

- Retain and enhance Havant Footpath 11 (and state the opportunity to upgrade it to a multi-user route)
- Include a requirement for links between the site and the town centre to encourage cycling
- Increase the capacity of the site to 150 dwellings to reflect the edge of centre ("transitional") location
- State that any adverse impact on the SRN is considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013

Comments where no change is considered necessary:

- The capacity and future growth of early years infrastructure has been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP)

## H44 - Land North of Fort Purbrook

12 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### The principle of development and general comments

Support for the allocation.

Replacement provision of the golf course would be needed to comply with Policy E3/development may make the golf course an uneconomic facility.

The two allocation areas are not actually linked, no access to western triangle.

Site should not be referred to as Campdown.

Site can come forward separately to the two nearby sites.

References to development and open space being in the east and west respectively should be deleted.

What employment prospects will there be for new inhabitants?

Planning applications should go to Chichester Harbour Conservancy and Langstone Harbour Board.

There is a rush to develop this site.

Will have an effect on house prices and desirability of the area.

#### Infrastructure

Welcome the approach in the policy regarding education infrastructure. However supporting text should be updated to ensure complete consistency with the IDP, which states that Morelands School can expand to 3FE. The next version of the Local Plan should reflect the latest position agreed with Hampshire County Council.

It is requested that any potential adverse impacts to the safe and efficient operation of the Strategic Road Network (SRN) be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

PCC may be able to provide land to assist HCC with their education priorities in lieu of a financial contribution.

Concern over impact on infrastructure, particularly healthcare and education (including secondary).

Allotment requirement is not applicable as that policy refers to land in agricultural use.

Allotments are stated as being required in the west of the development. Access, topography and tree layout may dictate this is better placed elsewhere.

Not clear what kind of open space would be provided - open green space or floodlit pitches.

Contribution to education could be land in lieu of a financial contribution.

Identifies the west for "open space" - it already is open space.

With all sites proposed in Purbrook, roads will not cope with increase in traffic.

Housing around Morelands school will cause issues at pick up and drop off time.

Should highlight providing car parking for Morelands School.

What leisure and community facilities will be available?

Infrastructure to be delivered comprehensively - this should include early years.

A permissive path runs from Havant Footpath 128, across the recreation ground to Copse Close. HCC would like to explore whether this route could be dedicated as a public right of way, and if so, HCC request that this allocation provide a contribution towards achieving this objective.

### Site specific constraints

Tree surveys are needed and TPOs put in place.

An arboricultural assessment would be needed as part of a planning application.

Sensitive for ecology, including Bechstein's Bat.

Where would access be?

Not clear what mix of homes there would be.

Properties in nearby roads suffer from surface water flooding, development will exacerbate this.

Will have a negative effect on the rural character of the area and the special nature of Portsdown Hill.

Landscape already partly degraded. Requires even more restraint to maintain what remains of its scenic, wildlife and historic value.

How will the elevation be taken into account?

### HBCs proposed way forward for Regulation 19 HBLP2036

As has been highlighted through the consultation, the site is used for sporting facilities and the need for these is currently being reviewed. This could potentially have a fundamental impact on the suitability of the site for development.

Through the Draft Local Plan it is clear that the Borough can provide sufficient sites to accommodate the need for housing together with a reasonable buffer. This would not change if this site (and others where the principle of residential development is being reconsidered) is not allocated. On this basis, it is appropriate to reconsider the principle of residential development on this site after the publication of the Playing Pitch Strategy.

Notwithstanding the above, if the allocation is still to proceed in the future, consider whether the policy should be amended to:

- Set out how the two sections of the allocation would be linked, given that the western one is landlocked and clarify whether both sections are needed
- Clarify the detail of the expansion of Morelands School. It could be pragmatic to allocate Morelands School for expanded educational facilities, including any section of this site that is needed for access and parking
- Include text regarding open space and allotments needs amending
- Require an arboricultural assessment to support any planning application
- Require a landscape and visual impact assessment to support any planning application
- Update the site opportunities and constraints should be updated to highlight that the site is partly in the Bechstein Bat area of search
- Highlight the extent of ancient woodland within the site and its impact on design and layout
- Update references to the expansion of Morelands School need to reflect the latest position, bearing in mind that if for whatever reason the expansion is not completely possible, land may be required on this development site for a new school.
- Whether any references to the management and mitigation of the development on the SRN are needed, following completion of the Borough Wide Transport Assessment.
- Include reference to upgrading the existing permissive route to a right of way

The following detailed matters raised are for consideration at planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (IN3)

- Access (IN3)
- General ecology (E15)
- Woodland, trees and hedgerows (E15)
- Transport mitigation (IN3)
- Housing mix (H3)
- Drainage (E13)

Comments where no change is considered necessary:

The allocation as drafted would not prevent the site coming forward separately to other nearby sites. However, it does require the infrastructure impact to be considered collaboratively with other nearby sites. This is logical given the amount of development proposed in the Purbrook area.

No specific employment provision is proposed on this site specifically as it is not considered a suitable site for employment provision. However, within the Borough as a whole, a large amount of new employment provision is being planned for.

Any impact on nearby property prices is not a matter which the Local Plan is able to take into consideration.

The site is proposed for development; however the Local Plan does not set out when the site should be developed.

The impact on the Borough's infrastructure networks is being comprehensively assessed through the Infrastructure Delivery Plan. This shows that there are deliverable solutions regarding early years, healthcare and primary education. The impact on secondary education of proposed development can be accommodated within the Borough's existing schools. For primary education, this would involve the expansion of Morelands School. The draft IDP shows no need for community facilities in this area.

## H45 - Former South Downs College Car Park

8 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Concerns in relation to the loss of the car park:

- College requires more car parking
- Car park not surplus to requirements
- Overspill parking on adjoining residential streets
- Vehicle movements / car parking associated with college facilities, including sports facilities and football pitch

It is the current college car park not the former.

Term time bus services only.

Increase in capacity of Camp Down site (from 350 to 560 dwellings) and cumulative impact of this site.

Adverse impact on Portsdown Hill / landscape.

Sensitive location in terms of archaeology and ecology.

Concern about the timing of the site coming forward for development.

Impact on the local environment.

Loss of green space.

Impact on existing residents.

The site is adjacent to a primary support area for Brent Geese and Waders.

Concern over relationship between the Council and the landowner.

Chichester Harbour Conservancy and the Langstone Harbour Board should be consulted.

It is requested that any potential adverse impacts to the safe and efficient operation of the Strategic Road Network (SRN) be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

Welcome the approach in the policy regarding education infrastructure. However supporting text should be updated to ensure complete consistency with the IDP, which states that Morelands School can expand to 3FE. The next version of the Local Plan should reflect the latest position agreed with Hampshire County Council.

Infrastructure to be delivered comprehensively - this should include early years.

Will have a negative effect on the rural character of the area and the special nature of Portsdown Hill.

Landscape already partly degraded. Requires even more restraint to maintain what remains of its scenic, wildlife and historic value.

### HBCs proposed way forward for Regulation 19 HBLP2036

There is a need to further investigate the extent to which the car park is used and the pattern of use pending the changes to the campus (following the merge with Havant College).

Should the college demonstrate there is adequate car parking retained within the revised campus boundary following an assessment of parking demand, it would be possible to proceed with the policy as proposed in the Regulation 18 draft, with potential minor wording amendments. In addition, consider the following:

- Amend the title of the site allocation to reflect the fact the car park is still in use
- Explore opportunities to improve public transport provision between the two campuses

- Whether references to the expansion of Morelands School need to be updated to reflect the latest position, bearing in mind that if for whatever reason the expansion is not completely possible, land may be required on this development site for a new school.
- Whether any references to the management and mitigation of the development on the SRN are needed, following completion of the Borough Wide Transport Assessment.

The following detailed matters are for consideration at planning application stage:

- Landscape (E10)
- Archaeology (E9)
- Ecology (E15)
- Residential amenity (E6 / E20)

Comments where no change is considered necessary:

Concern has been raised in respect of the cumulative impact of development of this site, and the East of College Road (H41) site. The policy requires infrastructure to be delivered across the site and nearby sites in a coordinated and timely manner accordingly. Existing infrastructure provision has also been considered in detail through the Draft Infrastructure Delivery Plan.

The allocation as drafted would not prevent the site coming forward separately to other nearby sites. However, it does require the infrastructure impact to be considered collaboratively with other nearby sites, including the capacity and future growth of early years infrastructure. This is logical given the amount of development proposed in the Purbrook area.

The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.

The site is adjacent to a primary support area for Brent Geese and Waders as defined by Policy E17. A project level Habitats Regulation Assessment to inform any package of avoidance and mitigation measures has therefore reflected in the site requirements in the policy.

The Council has objectively assessed the merits of this site and has considered that the site should be allocated for housing.

## H46 - Padnell Grange

7 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Site suffers from severe drainage issues (underlain by red clay) - geological study is needed.

Area has considerable traffic flow problems / junction is already congested / difficult to navigate due to parked cars - traffic assessment is needed; Existing problems should be addressed before new ones are added.

Proximity of school access is a safety concern.

Fundamental objection to inclusion of the site.

Amendment to site boundary suggested to include a small area of land to the north.

There is a lack of infrastructure in the area.

Development of the site would mean a loss of green space.

Development of the site would mean a loss of community buildings.

Allocation supported.

Buildings on the site do not have historic merit and should not be required to be retained.

Development of the site would not affect the Hazleton Common and Waterlooville SINCs.

Number of dwellings should be reduced.

Development can be achieved without affecting trees

Bat surveys have shown presence in low numbers, and Bechstein's Bat is understood to be present only on the other side of the A3(M)

Havant Footpath 127 runs across this site, while Havant Bridleway 22 (Sheepwash Road) connects to the site's north-east corner. We would expect development at this location to retain this right of way, and provide a high-quality link between the two routes, with a suitable green corridor. In addition, HCC request that the allocation include the provision of developer contribution towards enhancing Footpath 127, which provides a sustainable travel link to Park Lane and The Queen's Enclosure to the south.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments.

In addition, consider whether policy should be amended to

- Amend the site boundary
- Remove criterion (b), as it is the Heritage Statement required through criterion (a)(i) which will provide the evidence as to whether historic buildings on the site should be retained
- Acknowledge underlying clay / poor permeability in site opportunities and constraints and include a requirement for a geological study and/or drainage strategy under criterion (a)
- Require the retention of and a contribution towards rights of way

The following detailed matters raised in the comments are for consideration at planning application stage and are covered by policies in the Local Plan:

- Drainage
- Transport Assessment
- Heritage Statement
- Ecological Assessment
- Arboricultural Assessment

Comments where no change is considered necessary:

- The site has been shown to have capacity for around 85 dwellings. No change needed to dwelling number
- It is acknowledged that the site includes some open space. However, this is not formally public open space, and the site is considered to be previously developed land.
- The site does not include any community buildings

## H47 - Woodcroft Primary School

1 response were received regarding this topic

### Summary of comments raised by residents and other stakeholders

Proposed allocation of this site supported

It is considered that the sports facility/play space required by the policy has already been provided

Further clarity required over access to the Woodcroft Farm site - suggested wording provided

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider whether the policy should be amended to:

- No longer require a sports facility/play space
- Provide clarity over where access should be provided

## H48 - Land at Waterloo Golf Club

13 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The density of development proposed is excessive and out of balance with the character of the area and should be reduced to 20.

Possible restrictive covenant on proposed allocation.

Question raised as to whether the area of allocation is a protected green space.

The allocation is in a SINC and as such should be protected.

Bats, as well as other wildlife including; deer, owls, hedgehogs, grass snakes and slow worms are present on site. Development may have a huge impact on nature conservation.

Trees and shrubbery and brambles are already being removed on site without regard to any bat or bird habitats.

Removal of trees on site (particularly Black Poplars) may result in subsidence to existing properties.

TPO's are present on site.

The woodland included in the allocation acts as a noise buffer for existing residents.

Concerns that there is no safe access available to the site and the capacity of the wider road infrastructure.

Concerns over safety regarding construction traffic and increased traffic arising from the development. Particularly with regard to children.

Construction traffic will create dust and mud on roads

Quality of life and residential amenity will be affected by increased traffic.

Properties were purchased due to quite location and views over the golf course, development will lower property prices

The allocated area is particularly prone to extremes of drought and flooding due to clay geology and trees.

Flooding is a problem and extra houses and impermeable surfaces may dispel surface water into neighbouring properties.

There is not enough capacity in local schools or doctors' surgeries. There is a complete lack of infrastructure.

Loss of community buildings.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The Council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to:

- Change the boundary of the site to exclude the area of woodland

The following detailed matters are for consideration at the planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (IN3)
- Access (IN3)
- Ecology (E15)
- Flood risk and drainage (E12 / E13)
- Residential amenity (E6 / E20)

- Woodland, trees, hedgerows, TPOs (E15)
- Landscape and Townscape (E10)

Comments where no change is considered necessary:

- There are no community buildings within the allocation area.
- GP provision, school capacity and other infrastructure considerations have been assessed as part of the Borough-wide Infrastructure Delivery Plan (IDP)
- The site is located within Flood Zone 1, an area with less than 1 in 1000 year annual probability of sea or river flooding - concerns raised in relation to flooding are likely to be in relation to surface water flooding due to ground geology. As above, an appropriate drainage strategy as part of any proposed development would be secured in accordance with the requirements of policy E12. This would ensure there is no increase in surface water runoff from the development.
- Views are not protected within the planning system.
- Impact on property prices is not something the Local Plan can take into account.
- Removal of vegetation not protected by law on private land is the right of the landowner.
- Any subsidence created by works on site would not be a matter for the local plan but would be a separate legal matter between landowners.
- Although the area is designated as a Site of Importance for Nature Conservation (SINC) the allocation area has been screened for ecological value by the Council's Ecologist and is considered suitable for development once further surveys and mitigation have taken place as the ecological value is at the site's edges. The allocation policy requires further ecological survey work and identifies specific mitigation for known protected species.
- As any restrictive covenants have the potential to be removed by the signatories this is not a reason to consider the site undeliverable.
- The site is not identified as a protected green space. The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.

# Commercial development

## C1 - New Employment Provision

5 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

No reference to protect marine businesses from non-marine related employment and other uses as per Policy CS2 in the Core Strategy.

Class D2 sports uses should be acceptable on employment sites - both in terms of providing a sustainable working environment, an attractive area for business locate to, as well as generating employment opportunities.

Need to revise overall employment provision figures subject to revised capacity at Dunsbury Park.

Concern in relation to loss of marine-related floorspace at Northney Marina, and note its inclusion on figure 70 as an 'intensification opportunity' as well as its own settlement boundary to suit the proposed allocation.

It is requested that any potential adverse impacts to the safe and efficient operation of the Strategic Road Network (SRN) be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider how the policy may be amended to include:

- Protection of marine businesses and the Council's approach to the consideration of proposals resulting in the loss of marine-related employment
- Sufficient flexibility to support Class D2 sports uses on employment sites
- The safe and efficient operation of the SRN in relation to the proposed redevelopment and intensification of employment areas such as Harts Farm Way North

In addition, review total employment floorspace likely to be delivered, subject to any revisions of the site capacity at Dunsbury Park (KS6) and the inclusion of any further sites.

Comments where no changes are considered necessary:

Northney Marina (H30) is a mixed-use allocation for residential, employment and commercial uses. The redevelopment of the site will involve the redevelopment of redundant office floorspace. Whilst this will result in a net loss in office floorspace, this will be partly offset by gains in new office and commercial floorspace as part of the redevelopment of the site. However the principle of development on the site will be subject to further consideration (please see response to Policy H30 (Northney and Sparks Marinas)).

## C2 - Protection of Employment Sites

2 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

It would be helpful to list the 'established employment areas' with individual maps clearly showing each site.

Northney Marina should be included as an established employment area.

Concern that marketing requirements have been weakened.

No reference to importance of protecting marine-related employment sites.

Revised policy wording to include reference to 'economic development' use in place of 'employment development'.

There is no justification for inclusion of non-food retailing as an employment use.

Emerging Policy C2 sets out specific criteria specifying in what circumstances employment land may be redeveloped for alternative uses. Yet paragraph 6.19 simply states that "Land allocated for industrial or commercial use can be used for Starter Homes where this land is underused or unviable for those purposes". This is a very general statement, which implies that a lower evidential threshold for assessing the acceptability of a proposed change of use would apply where Starter Homes were proposed.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider how the policy may be amended to include:

- A list of established employment areas with accompanying maps included within the supporting text including the consideration of Northney Marina (H30) as an established employment area
- Clarification on the protection of marine businesses and the Council's approach to the consideration of proposals resulting in the loss of marine-related employment
- A criterion supporting retail (both food and non-food) and other complementary uses provided they are of a scale which is subservient to the main function of the employment area
- Clearer guidance on how the Council will consider proposals submitted under the Government's Starter Homes exception sites policy.

Whilst Northney Marina is already identified as a mixed-use allocation (H30) which only permits residential development where it will not adversely affect the primary function and operation of the site for marina purposes (nor result in the net loss of employment from the site), it is considered that it may be prudent to safeguard the marina from other non-marina uses in the long term.

Comments where no change is considered necessary:

As currently defined within the NPPF, 'economic development' includes those within B Use Classes, public and community uses, and main town centre uses (but excluding housing development). It is considered that economic development contains a broad range of uses which would result in an overly permissive policy if the scope was expanded outward to include all of these uses. As above, it is however, considered appropriate to include a criterion relating to small scale uses which are complementary to the function of the employment area.

It is suggested that marketing requirements have been weakened as they are not included within the policy itself. The policy wording is clear that a realistic and active marketing exercise is required, and it is considered appropriate to include the relevant marketing requirements within the supporting text.

### C3 - Land north of Solent Road

2 responses were received regarding this topic

#### Summary of key comments raised by residents and other stakeholders

Support for the site to be developed for Portsmouth Water's Headquarters.

Request to amend the site's boundary in accordance with the access and landownership creating a new site area of 1.708 ha.

Request to amend criterion b) in accordance with National Planning Practice Guidance (NPPG) paragraph 023 to read "*Brockhampton Conservation Area is preserved or enhanced*".

Request to amend criterion di) to read "*where possible, and subject to appropriate mitigation, retains and integrates the protected trees on the site*" so that other constraints (i.e. access) which may require the loss of trees is taken into consideration.

The policy should acknowledge the need for the development to be located outside of the areas at risk of flooding, and provide appropriate floodplain compensation. The flood risk issues are likely to provide significant limitations in terms of the scale of development deliverable on the site.

#### HBCs proposed way forward for Regulation 19 HBLP2036

Subject to the outcomes of the SFRA phase II, proceed with policy as proposed in the regulation 18 draft with any necessary amendments. In addition, consider whether the policy should be amended to include the suggested amendments to criteria b) and di), along with the proposed boundary alteration.

## C4 - Cowplain District Centre

1 response was received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The car parking allowed on the A3 through the centre is hazardous to cycle past, as such cycling to the centre feels unsafe.

There are numerous sheffield stands which are adequate for short-term cycle parking in dry weather. Suggestion to include covered and secure cycle parking to help improve all-weather use of the centre.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to encourage secured and covered cycle storage. The Council is producing a cycling strategy which will consider how the cycle network can be improved so that everyone can easily access and use shopping areas.

## C5 - Emsworth District Centre

4 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Parking in Emsworth is close to capacity and that greater provision is needed. Suggestion to include a two-tier parking scheme (like Havant Railway Station) on the Palmer's Road car park.

What sites has the Council identified for additional parking in Emsworth Centre?

Charity shops do not encourage shoppers.

More shops are closing, along with Emsworth's last bank; this has impacted upon local businesses.

Suggestion to co-locate the banks and run three desks and one venue.

Suggestion to promote the development of the Emsworth Victoria Cottage Hospital for a GP Surgery and other town centre services.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording changes.

Comments where no change is considered necessary:

- It is considered that Emsworth District Centre is well-served for parking and no sites have been identified for additional parking; however, there is nothing in the policy to prevent a two-storey car park or other parking options coming forward in principle if the demand is shown and it is viable.
- It is not in the remit of the HBLP 2036 to deter or promote specific shops and services (i.e. charity shops and banks). Instead the HBLP 2036 proposes frontages for certain uses as outlined in the Land Use Class Order 1987 (as amended).
- Emsworth Victoria Cottage Hospital has been proposed as its own allocation in the Draft HBLP 2036, please see Policy H12.

## C6 - Mengham District Centre

2 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Retail shops in the centre are decreasing and being replaced by offices, cafés and other eating places; this change is organic based on the population's changing needs.

The idea that the Council can influence the evening economy is a red herring as this is seasonal; except for the summer months, most establishments have few customers past 9:30pm.

Paragraph 7.58 states that the Council-owned car parks could be redeveloped for housing; this will close the gaps.

The arrival of Lidl appears to be a good thing and will help maintain a good mix of shops; however, this will not be enough if more people move onto the island.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments.

Comments where no change is considered necessary:

- By setting policies which guide the types of land class uses permitted within the primary and secondary frontages, the Council can help influence and improve the evening economy for both residents and visitors.
- The centre's three car parks are brownfield sites surrounded by retail and residential development. It is important to consider their redevelopment in the future in order to maximise their use to support the centre's health, i.e. for further retail units if a clear marketing need was identified, the extension of the health centre and/or residential development on brownfield land.

## C7 - Local Centres, Local Shops and Services

1 response was received regarding this topic

### Summary of key comments raised by residents and other stakeholders

It is important that clarification is provided within the wording of the policy to confirm that the 280 square metres does not represent a locally set impact threshold as envisaged by national planning policy.

In the absence of any robust consideration being undertaken to support a locally set threshold, it must follow that the default threshold set by national planning policy (i.e. 2,500 square metres) would apply.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments to clarify that the 280 square metres is not referring to the impact threshold envisaged by national planning policy. In addition, consider whether to amend the policy to specify that the Sequential Test will apply for any proposal of more than 280 square metres outside of the designated town, district and local centres, and that an Impact Assessment will be required for proposals over the national default threshold which are also outside designated centres.

## C8 - Food, Drink and Entertainment Uses

1 response was received regarding this topic

### Summary of key comments raised by residents and other stakeholders

There are no restrictions placed on Land Use Class A5 (hot food takeaways) despite the acknowledgement in Paragraph 7.88.

There is a growing body of evidence that proximity to hot food takeaways is associated with obesity.

It is encouraged that the Council use the policy to restrict the density of Land Use Class A5 in the Borough as per Government Guidance on [Health and Wellbeing](#).

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether further investigation into the health impacts of hot food takeaways should be undertaken and whether the Council could appropriately restrict the density of Land Use Class A5. To do this, further evidence will be required to justify the level of restriction.

## C9 - Former BAE Systems Park

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Support allocation but policy should be more flexible to allow wider uses (as permitted) - Local Plan should make a potential allowance for residential development.

Pedestrian / cycle route secured as part of Lidl scheme (ref. APP/15/00772) and should not be referenced.

Marketing should not be required as part of a planning application.

Query as to whether site in public ownership.

Query as to what new leisure facilities are planned.

Site plan should recognise this site as a mixed-use allocation not an employment allocation.

Inclusion of 'the site is within SPZ 1c / close proximity to SPZ 1c for Havant & Bedhampton Springs' under the 'Site Opportunities & Constraints'

Question as to whether the Council are aware that the Original Bowling Company have registered an interest in becoming part of a leisure development-park with the provision they are not a standalone (they require other leisure providers e.g. cinema and restaurants). The Council should open talks with the developer (Hargreaves) and the Original Bowling Company to find common ground. This is a crucial site with in Waterlooville and could be a jewel in the Local Plan for the Havant and Waterlooville area.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider the following:

- Investigate whether the pedestrian/cycle route linking the site with Wellington Park has been implemented
- Reference to the site's proximity to SPZ 1c for Havant & Bedhampton Springs
- In addition, amend Figure 77 to reflect the fact that this is site is a mixed-use allocation

Comments where no change is considered necessary:

It is considered that, as drafted, the mixed-use allocation for leisure (Class D2) and other main town centre uses is sufficiently flexible. Furthermore, the Havant and Waterlooville Town Centres Study (2017) recommends the site allocation is maintained for leisure uses. As such it is not appropriate to amend the policy to include a wider range of uses.

It is accepted the site promoter has continued to market the site and work collaboratively with the Council to bring the site forward for development. Whilst specific operators and businesses may well have expressed interest in occupying a unit on the site, this needs a lease to be agreed that is acceptable to all parties, including the site operator/developer, including the ability to generate a reasonable profit. However, as part of any planning application, the applicant will be required to provide a statement detailing the level and type of marketing undertaken and for what use etc. This should help to inform the type of proposed development form and uses on the site, including leisure provision.

The site is in private ownership.

## C10 - Tourism

7 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Comments about Hayling Island seafront regeneration - please see table on 'Hayling Island Seafront (General)'.

Emsworth, Staunton Country Park and Hayling Island have their own unique features and attract different types of tourism trade.

Housing development does not increase tourism or provide jobs.

Only reference to improving leisure facilities is a watersports centre.

Tourism facilities should be of high quality design.

Need for all year-round facilities.

Hayling ferry is important to provide access to and from the island.

Support new and improved tourism accommodation and facilities, including flexibility for changing market trends.

Need for greater flexibility for tourism at all scales - support should not be restricted to small scale.

More day visitors and housing will generate additional traffic.

Hayling Island requires a strategy for tourism.

Improved pedestrian and cycling routes.

Concern that loss of tourist accommodation and lack of facilities will deter tourists.

Paragraphs 23 and 28 of the National Planning Policy Framework (NPPF) promote tourism in rural locations, to support competitive rural economy.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider whether the policy wording could be amended to allow a greater degree of flexibility for the scale of tourism proposals.

In addition, investigate whether there is a need for additional research in respect of tourism and the visitor economy to inform the Regulation 19 HBLP 2036.

Once the borough-wide Transport Assessment is completed, the draft IDP will be updated to reflect and incorporate the recommendations from the transport analyses. This will inform the Regulation 19 version of the Plan.

Comments where no change is considered necessary:

The policy provides sufficient flexibility for all-year round facilities, having regard to changing market trends.

It is considered that the policy strikes an appropriate balance in terms of safeguarding tourism accommodation from non-tourism uses and providing flexibility where it can be demonstrated that there is no reasonable offer for tourism for accommodation purposes and there is available and suitable alternative accommodation (should the operator wish to relocate).

The Hayling Island Ferry as well as walking and cycling are considered in detail through the draft IDP.

## C11 - Protection of Existing Community Facilities and Shops

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

It is recommended that the policy distinguishes between commercially-run and publicly-owned or managed community facilities and, as such, that the policy adopts a similar approach to Policy SD43 in the Pre-Submission South Downs Local Plan.

Objection to the policy as it is too restrictive, inappropriate and unhelpful to public services.

The policy is restrictive and would harm the NHS's ability to improve the provision of healthcare services by increasing efficiencies (i.e. via the disposal of unneeded and unsuitable properties). A restrictive policy would prevent or delay the reinvestment of capital in modern and fit-for-purpose facilities.

It should be accepted that the NHS's testing and approval process provides sufficient evidence that a facility is neither needed nor viable for its current use or other community uses and that adequate facilities, which meet the needs of the local population, are or will be made available.

The loss of any County Council facility is preceded by a considered assessment that, where it provides a statutory public service, includes an alternative provision strategy that would satisfy criteria a), b) and c); however, in some circumstances there is no alternative provider, and/or the facility has become unsuitable.

The built facility can be so specific to a particular service that it is impractical to adapt it to an alternative community use. In such instances, and where the sale of a surplus facility is part of the County Council's ongoing reinvestment strategy, requiring an intensive exercise can impose unhelpful and unnecessary delay in securing funding for public services.

It is recommended that the policy distinguishes between commercially-run and publicly-owned or managed community facilities and, as such, that the policy adopts a similar approach to Policy SD43 in the Pre-Submission South Downs Local Plan.

Paragraph 7.106 - Request to include "*cultural facilities*" to the list uses outlined as community facilities. This would ensure consistency with Paragraph 70 of the NPPF.

Paragraph 7.109 - Request that the policy also applies to Land Use Classes D2 and Sui Generis. This would maximise protection for community facilities and be consistent with the NPPF and other Local Plans.

Paragraph 7.112 - Various suggested wording changes submitted to state that:

- Re-provision is the first priority;
- The NHS's Modernisation Strategy is an exception, and;
- The loss or change of use of existing community facilities will be acceptable if shown to be part of a wider estate regeneration programme and that such evidence would be accepted rather than evidence of marketing.

Criterion c) - This should be deleted as it undermines the policy. It is too permissive as it allows for no assessment as to whether there is sufficient capacity within the alternative facility to absorb displaced demand, neither does it determine whether the existing and alternative facilities are compatible.

Criterion c) - This should be replaced with "*adequate facilities are provided to meet the needs of the local population*".

In the last paragraph of the policy box, add: "*unless in the context of healthcare provision, the loss of facilities arises from an NHS Service Modernisation Strategy*".

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to incorporate a more flexible approach for premises providing public services using the suggested amendments provided in the first row above and Policy SD43 of the Pre-Submission South Downs Local Plan. If considered appropriate, amend the wording of the policy as appropriate. Also consider the suggested amendments to paragraphs 7.106 and 7.109 as to whether cultural and leisure facilities should be included.

# Other matters

## Additional policies that should be included in the plan

9 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Ecological approach to everything discussed.

Address the use/abuse of second homes. On Hayling there are a significant number of second (holiday) homes that are empty for significant periods. By discouraging (and/or adding to HBC revenue stream) second homes the housing "crisis" would be much reduced in many coastal areas.

With number of houses that are being built in the Waterlooville and Cowplain area, I feel we need some form of entertainment i.e. a cinema or theatre, bowling alley or any other idea that should come to mind. Is this in the plan at all?

Provide infrastructure and design guidance on plots for prospective self-build purchasers (which is the Australian model and controls land speculation). This is more beneficial for local contractors than giving huge parcels of land to a single large developer, which in turn is also better for the local economy.

HBRA feel there is scope for self-build development in the Borough particularly on the large sites and we ask the council to reserve some land for this purpose. There are many skilled trades' people in the Leigh Park, West Leigh and Warren Park areas unable to afford to buy a home but have skills to build one.

Our connection to the internet is very poor, and without cabling there is very little we can do about it. It is very short sighted to build any new housing these days without cabling for telecoms to the houses. Please insist that this is part of the standard for the future. Any plan for extending cable access to existing housing on the edge of residential areas (Redlands Grange) the future would also be appreciated.

Discouraging pre-emptive actions. There have been examples in the past of unscrupulous developers or landowners taking pre-emptive action to make a site more acceptable to development by destroying artefacts or green infrastructure which might have limited development. Is there room for a policy which denies development where such actions have taken place? This would in effect kill the "golden goose".

Natural England recommends that there is a policy to protect irreplaceable habitats such as ancient woodland and aged or veteran trees, to ensure their protection. Natural England and the Forestry Commission have produced standing advice on ancient woodland and veteran trees.

The emergent springs in the Borough are extremely significant in that they provide clean water supply from chalk aquifers to the north. This calls for a more coherent management plan for the Borough's 'blue infrastructure'. Management of this Blue Infrastructure (aquifers, water courses etc) must be centrally planned and coordinated, and any new development integrated into the central plan, and cater for Climate Change predictions.

### HBCs proposed way forward for Regulation 19 HBLP2036

The Council will consider the following in the production of the Regulation 19 HBLP2036:

- Whether a new policy to provide master planning for blue infrastructure is required (please also see summary table on Policy IN4)
- A requirement to protect ancient woodland and aged/veteran trees as set out in the standing advice published by Natural England and the Forestry Commission, either as a criterion in this policy or in a stand-alone policy (please also see summary table on Policy E15)

Comments where no change is considered necessary:

The Specialist Housing Analysis considers the need for self and custom build accommodation in the Borough. The Council is supportive of this way of building homes, particularly as a way for people to get on the ladder who otherwise might not be able to. However the level of CIL self-build exemptions compared to the number of entries on the Council's self-build register shows that there is already sufficient sites coming forward to meet the need for self and custom build housing in the Borough. As such, it is not considered necessary to identify specific sites or sections of larger sites for this purpose.

Policies E15 (Ecological Conservation), E16 (Solent Special Protection Areas), E17 (Brent Goose and Wader Feeding and Roosting Sites) and E18 (Protected Species) set out the Council's approach to the conservation and enhancement of ecology, wildlife and protected species in the Borough. These policies will be reinforced by the guidance and advice provided by the forthcoming Havant Biodiversity Strategy.

The Council does not consider it necessary to restrict the use of new builds to residents as their primary residence.

The former BAE Systems Park (Policy C9) in Waterlooville is allocated for mixed use development including leisure uses. The Council is supportive of delivering new and innovative leisure facilities which will be complementary to the town centre. In this respect, the applicant will be required to demonstrate the leisure operator demand has been fully explored in accordance with the requirements of the policy.

Paragraph 4.11 of the supporting text indicates that a key infrastructure requirement for the Borough is that *"All new development needs to be served by [the] fastest digital communication technology available."*

In considering the potential suitability of sites for allocation, site assessments have informed the basis of any designation or protection - for example, the identification of land as a Site of Importance for Nature Conservation or the serving of a Tree Preservation Order. However, ultimately, the landowner is free to manage the site as they wish. Any breaches of planning control would be a matter for the development management process.

## Evidence Base - Gypsy, Traveller and Travelling Showpeople Accommodation Assessment

1 response was received regarding this topic

### Summary of key comments raised by residents and other stakeholders

We do not accept the low level of need as established by the GTAA. We do not consider the assessment of need is sound.

Paragraph 10 of Planning Policy for Traveller Sites sets out national guidance and requires that criteria based policies should be set to guide decisions "where there is no identified need." Thus the first criterion to policy H5 which requires a need to be established before favourable consideration can be given to a Traveller site is unacceptable in its present form. Either the first criterion should be removed, or a separate policy should be added to deal with the criteria to be applied where no overriding need exists.

### HBCs proposed way forward for Regulation 19 HBLP2036

The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) provides a robust assessment of current and future need for gypsy, traveller and travelling showpeople accommodation in Havant Borough, and was prepared in accordance with Planning Policy for Traveller Sites (August 2015).

Since the GTAA was undertaken, permission for a single pitch on Long Copse Lane has been granted on appeal (APP/X1735/W/3156978). This will need to be reflected in the policy in the Regulation 19 HBLP2036. Please also refer to 'H5 - Gypsies and Travellers' summary table.

## Evidence Base - Integrated Impact Assessment

2 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Havant Borough Council's Integrated Impact Assessment includes a section on the impact on Public Health and Safety. For the reasons given above, it is very clear that this development (H22 Lower Road) will have a negative impact on public safety which and hence should not go ahead.

### Equality Issues in Local Plan

There are some major problems with both the approach taken in many domains, the wording used, and also the assumptions made leading to the facilities directed and requested. These issues which appear consistently throughout the document could result in a major legal challenge under the Equality Act (2010).

The language used in the document and the obligations potentially to be imposed for many housing developments identified in the local plan show a misunderstanding of the Equality Act.

The key flaw is that the plan calls for specific facilities for age groups, in most cases either children of the elderly. In addition, it mentions facilities for the community, but it is not explicit in defining the extent of 'community' as including all members. The 'Act' defines a number of groups with protected characteristics, the largest and most detailed group being those with disabilities and age IS one of those, but only in terms of a comparator, the 'elderly' are not a protected group in, and of, themselves any more than children are.

The Local Plan allocates a large number of specific areas for development. Each of these developments has specific design requirements, such as shops, funding for schools or local school growth, and sports or recreational facilities. In a significant majority of these developments there are specific requirements for community facilities for the elderly and plan areas for children. However, there are no requirements specified for disabled people who, of the groups specified, are the only group with protection under the Act. To avoid the potential of prosecution for discrimination, there would need to be a balance of facilities or specific requirements for disabled people. For example, community sporting facilities which include changing rooms should explicitly be required to accommodate accessible facilities.

While there are both national and indeed extended local standards for road and pavement designs under Hampshire Highways, these are rarely considered by the Authority at the time of approval because it can often take many years, if ever, before the roads within an estate are submitted for adoption, thus the Highways Authority will not take a close interest.

The same lack of interest also applies to other inspectors as well, such as Approved Building Inspectors, simply because it is unlikely that housing designs would need to be considered in close detail for modification during a period where building regulations are enforceable.

In order to avoid the risk of prosecution or failure to achieve approval from the relevant authorities due to discriminatory practices, there will regrettably need to be a considerable degree of modification to the wording in most sections and most pages.

As the primary disability group in the Borough of Havant, we are distressed at seeing the same, almost callous, attitude towards disabled people, not driven through intent, but simply by basic ignorance across many different departments and organisations all of whom assume that everything is someone else's problem.

### HBCs proposed way forward for Regulation 19 HBLP2036

An Integrated Impact Assessment (IIA) was undertaken for the draft HBLP2036. This showed that there would not be a disproportionate impact on any equality group, including the disabled. The Council will continue to subject future versions of the Local Plan to IIA in order to make sure that they will not have a disproportionate impact on any groups in society, including the disabled. However it should be noted that the accessibility of the built environment requires a careful approach to the issue through the planning system but also the full implementation of the Building Regulations, which is outside of the Local Plan's jurisdiction. However, the points raised will be considered further in order to make sure that the Local Plan goes as far as possible in creating accessible new developments.

The Council's engineering team have been involved in the drafting of the Local Plan allocations. Nonetheless, this is matter would need to be considered further at a planning application stage.

There are a number of policies, which specifically refer to the needs of the disabled such as Policy E6 High Quality Design, E7 High Quality New Homes and E1 Health and Wellbeing. These policies would apply to all developments.

## Evidence Base - Local Plan and CIL Viability Study

7 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

For the plan to be sound as considered against the tests of soundness set out in paragraph 182 of the NPPF, the Council should ensure the following actions are taken: The full impact of the policies in the plan are included in the viability assessment.

#### Town Centre Development

There appears to be a degree of contradiction between the findings of the study and the approach to affordable housing set out in the consultation document - dense flatted schemes would not necessarily be viable even were there a requirement for 20 percent affordable housing provision. We recommend the proposed tariff for town centres is revisited.

It would appear from the Council's evidence that 20% viability on town centre schemes could be unviable (see detailed comments about the viability margins). We would therefore suggest the Council considers a lower affordable housing target in these areas [Havant and Waterlooville] to reflect the aspirations of the plan and the evidence with regard to values and viability of such development.

#### Sheltered Housing and Retirement Accommodation

Use Class C2 care homes and extra care schemes were assessed on the basis that they would not benefit from a 'zero' CIL charge and would not be liable for affordable housing contributions. To create certainty and reduce potential for unforeseen viability issues, the status of such developments should be set out explicitly within Policies H2 and H4.

Concern that the weight of affordable housing contributions on retirement living or sheltered housing schemes falling into Use Class C3 could render such schemes unviable. Viability Study finds that even up-market schemes (in high-value locations within the Borough) are only marginally viable when a 20 percent tariff is sought. Such schemes would also be liable to make CIL payments.

Recommend differentiated CIL rates or affordable housing tariffs are considered for specialist forms of accommodation.

Concern that the level of affordable housing contribution for retirement and sheltered accommodation could make such developments unviable. The viability study indicates that such developments even when assessed at relatively high value points of over £4,000 per square metre are only viable at 20% affordable housing contributions in the higher value areas.

The costs of providing retirement and sheltered accommodation is distinctly higher with a high degree of common areas in such developments that are required but do not add any additional value to the units sold. The Council should carefully consider whether adjustments are needed to the affordable housing policy to reflect the different viability considerations affecting such accommodation.

The viability study has considered a limited assessment of "sheltered" or retirement housing and this type of development will struggle to meet the overall target for affordable housing and remain viable. The viability study suggests that only in the higher value areas will it be possible to even achieve the lower target for affordable housing. It would be more sensible, therefore, to set a more realistic target for affordable housing for Retirement Housing especially bearing in mind that these schemes will be developed on more difficult, constrained sites and with much higher development costs.

#### Electric Vehicle Charging Points

Strongly object to the requirements [in Policy IN3] for the provision of Electric Vehicle charging points. The Council's viability report allows for a figure of £500 per plot for charging points and concludes this will not have an implication on viability. In our experience the installation of charging points can cost over double this amount, which would have a negative impact of viability, and could adversely impact upon a schemes ability to provide for other policy requirements, such as affordable housing.

#### Low Carbon Design

Strongly object to Policy E8 (Low Carbon Design). The policy has not been subject to the required viability tests in accordance with paragraph 173 of the NPPF.

### **Space Standards**

It is necessary for the Council to demonstrate that applying the [space] standards would not affect the affordability of dwellings. The Local Plan Viability Study only considers the overall impact on viability, but applying space standards would most certainly result in oversized smaller product which in effect will result in housing provision being less affordable. The Council have not considered need or affordability.

### **Solent Recreation Mitigation Strategy**

Concern that the viability study does not appear to have accounted for contributions which will be required to satisfy the requirements of the 'Habitats Regulations' and mitigate impacts upon the Solent Special Protection Area (SPA). It is essential that all of the cumulative developer contributions are accounted for at plan making stage. Reference to the requirements of paragraph 174 of the NPPF.

It is not clear in the viability assessment whether the financial contribution relating to the Solent Special Protection Area has been included in the assessment of viability. The most recent Solent Recreation Mitigation Strategy has increased the mitigation required - it is essential that these costs are included in any viability assessment. Whilst on their own these costs are unlikely to affect viability it is important for the full cumulative impacts of Local Plan policies to be tested, especially where viability is marginal.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with Local Plan and CIL Viability Study to Regulation 19 HBLP 2036 with related clarifications and updates to the draft report. In addition, consider:

- Clarifying the affordable housing requirement for sheltered and retirement housing in Policy H2
- Whether there is a need to clarify the status of sheltered, retirement and other specialist forms of accommodation in the Draft Local Plan and the CIL Charging Schedule.
- Whether further evidence is needed to assess whether affordability in the local housing market can be maintained with the introduction of space standards
- Sensitivity testing in relation to higher energy efficiency standards as set out in Policy E8
- An assessment of the cumulative impact of individual section 106 costs

Comments where no changes are considered necessary:

The Local Plan and CIL Viability Study indicates that the affordable housing requirement within Havant and Waterlooville town centres is broadly deliverable. It is below the 30% affordable housing requirement which would apply elsewhere in the Borough, having regard to higher build costs in these locations. Recognising that viability varies in these locations, it is considered appropriate for the Council to set out a reduced affordable housing requirement as a starting point in negotiations.

In terms of CIL viability, the study recommends no differentiation be made for market-provided sheltered housing or similar developments.

The following policy considerations were included in the viability study:

- Nationally described space standard included and considered viable
- Low carbon design standards set out in Policy E8
- Electric vehicle charging points for new dwellings - makes only a marginal difference to development viability based on available information
- £3,000 per dwelling for s106 contributions - including a contribution for the Solent Recreation Mitigation Strategy in line with the newly adopted strategy

## Evidence Base - SHLAA

5 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

H6 (Land North of Long Copse Lane) - delivery will be slow due to constraints and requirement for comprehensive and coordinated masterplanning. Therefore, the site is likely to come forward in the middle to latter parts of the plan period. Trajectory over optimistic.

H7 (Selangor Avenue) - S106 still to be signed and conditions to be discharged first, therefore unlikely that first tranche of dwellings will be provide in 2019/20 as is suggested in trajectory.

H9 (Coldharbour Farm) - planning permission has expired, and no further activities have been progressed to suggest that the site is likely to come forward quickly. Delivery assumptions in trajectory unrealistic.

H15 (Forty Acres) - constraints on site and no planning application yet submitted, therefore the site will begin to deliver new dwellings more slowly than anticipated in the trajectory.

H16 (Land East of Castle Avenue) - policy states that development should not prejudice potential junction improvements to the A27 therefore not deliverable until this is known. Constraints relating to access, land ownership and noise/amenity. Identified constraints may also reduce developable area. Therefore, the site is not likely to come forward as anticipated in the trajectory and may well deliver fewer homes.

H17 (Land South of Bartons Road) - no reserved matter application submitted. Requirement in draft policy for access to be coordinated with Southleigh which may delay delivery. Phasing assumptions optimistic.

H18 (Portsmouth Water HQ) - constraints on site and complexity of delivery mean phasing assumptions in trajectory are overly optimistic.

H19 (Former Oak Park School) - whilst some conditions have been discharged and existing buildings demolished, construction has not commenced, it is unlikely that first completions will occur in 2018/19.

H21 (Land West of Havant Crematorium) - complications around coordination of development means that the site is unlikely to come forward in the earlier part of the plan period.

H22 (Land South of Lower Road) - the rigorous stipulations set out in the draft policy will require a creative design response, which will likely involve extensive negotiations with the Council. Accordingly, this site is unlikely to deliver within the earlier part of the plan period.

H24 (Car Park behind the Bear Hotel and East Street) - site extensively constrained so achieving a suitable scheme design will take time. The nature of the site also likely to result in unforeseen delays and complexities and has the potential to create viability issues. Redevelopment cannot be guaranteed and if it does come forward then it would likely be in the latter part of the plan period.

H28 (Fathoms Reach) - As with all the allocations on Hayling Island, the site is subject to findings of a Borough-Wide Transport Assessment and the Hayling Island Highways and Transport Infrastructure Assessment. Accordingly, the site cannot be considered deliverable at this stage.

H29 (Land North of Selsmore Road) - feasibility of the draft allocation remains uncertain in the absence of additional highways assessments. As such, the site cannot presently be regarded as deliverable.

H30 (Northney and Sparkes Marinas) - potential tension between the proposed residential elements and the engineering/ boat related employment uses. Site constrained (impact on SPA/ landscape/ heritage/ flooding) and there is little certainty over timing and deliverability of residential dwellings at these sites.

H31 (Sinah Lane) - ecological constraints and drainage issues. Doubts as to its deliverability as a result of potential highways and infrastructure capacity concerns, which have yet to be fully assessed.

H34 (Cabbagefield Row) - no planning application has been submitted despite being allocated for a number of years, therefore it is unlikely that the site will be brought forward quickly, with delivery more plausibly occurring during the latter part of the plan period.

H35 (Former Colt Site) - site extensively constrained. Trajectory suggests first tranche of dwellings will be completed in 2021/22 however, whilst Homes England have taken over the site, a planning application has yet to be prepared and submitted. The site should not be expected to deliver new homes in the short term.

H36 (Dunsbury Way) - the site potentially experiences ground quality and contamination issues. No planning application has yet been submitted and therefore unlikely that first tranche of dwellings would be completed in 2020/21 as suggested by the trajectory.

H37 (Riders Lane) - despite being allocated for a number of years no planning application has been submitted, question over whether this site can be relied upon to deliver.

H38 (Former SSE Offices) - whilst the site has been cleared, no planning application has been progressed. The apparent lack of urgency infers the potential for delays, which may be to the detriment of the trajectory.

H39 (Strouden Court) - site is occupied by residential dwellings, community and retail uses. Redevelopment on a site such as this will invariably involve protracted timescales and likely requires public sector subsidy. Whilst the proposal is supported in principle, the site should not be relied upon to deliver new dwellings.

H41 (Land East of College Road) - the trajectory ignores the complexity of the site, as well as the need to progress the scheme design, undertake pre-application discussions, achieve an outline planning permission, agree reserved matters and discharge conditions. All of which is likely to take a number of years to achieve. Accordingly, we consider that the trajectory for this site is overly optimistic, and unrealistic.

H42 (Woodcroft Farm) - in view of the outstanding requirement to discharge conditions, question over whether the first 20 completions will occur in 2018/19 as the trajectory suggests.

H45 (Former South Downs College Car Park) - policy requires site to be coordinated with H41, it may therefore be difficult to bring this site forward ahead of the larger allocation to the east. If this is the case then there is potential for delay and the site wont start delivering dwellings in 2021/22 as suggested in trajectory.

H46 (Padnell Grange) - constrained site and ambiguity of the developable area of the wider site does call into question that quantum of dwellings deemed achievable. No planning application has yet been submitted for the wider development of this site despite it having been allocated for several years. Site is likely to be relatively complex and challenging to bring forward. Accordingly, we suggest that the trajectory is overly optimistic in assuming that the first completions will occur in 2020/21.

H47 (Woodcroft Primary School) - no reserved matters submissions have yet been made and it is not clear how many planning conditions have yet to be discharged. Accordingly, the trajectory is considered to be overly optimistic in assuming that the first tranche of completions will be achieved in 2019/20.

H48 (Waterlooville Golf Club) - mitigation required in relation to SINC and proximity to A3(M) meaning the developable area is likely to be limited. The timing of the site's release will be contingent upon the business priorities of the existing occupier so unlikely that the site will be brought forward early in the plan period.

KS5 (Southleigh) - draft policy infers that the proposed allocation has the potential to deliver 1,100 dwellings within the plan period and a further 1,000 dwellings thereafter. However, the trajectory shows only 800 dwellings by 2035/36.

The SHLAA discounts 19 sites in the Emsworth area:

- Maisemore Gardens Green (EM02) is noted as having limited potential due to site constraints. It is an area of open land with a potential for at least 5 dwellings.
- Land adjacent to South Street Car Park (EM06) is noted as having limited potential. However even if a small area of the additional car park were to be included within the site it has the potential to deliver 8 dwellings.
- Greville Green Open Space (EM20) has the potential for 6 dwellings and retention of a reduced area of open space.
- Land east of 54 Long Copse Lane (UE46) could deliver 3 dwellings.

The discounted sites could deliver 22 additional dwellings.

Concern over trajectory including phasing assumptions and commencement dates. Consider that the plan would fail the test of soundness on this basis.

Land west of Emsworth (opp Brookfield Hotel, Havant Road) (UE11) - The very limited assessment undertaken via the preparation of the SHLAA seeks to dismiss the suitability of the site, without any evaluation of its sustainability. Similarly, the SHLAA evaluation gives no consideration to the extent of the harm (if any)

which development would actually cause to the AONB, bearing in mind that it is screened from the waterfront by dense vegetation.

Support for discounting Land North of Highbank Avenue (UE31) in the SHLAA on the basis that it retains the opportunity for a comprehensive development of this land in combination with land to the west, with access potential from London Road.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

The Strategic Housing Land Availability Assessment (SHLAA) forms an integral part of the evidence base that underpins the Havant Borough Local Plan. The SHLAA is a requirement identified in the National Planning Policy Framework (NPPF). It provides an assessment of land within the borough with potential for housing development by identifying sites, assessing their housing potential and considering when they are likely to be developed. It is reviewed and updated as the Local Plan progresses.

Phasing assumptions are regularly reviewed and based on up to date information that we have available, including from landowners and developers. The Council is satisfied with the phasing assumptions included in the SHLAA. Phasing and delivery assumptions will be updated prior to the Regulation 19 stage.

The trajectory (AMR 2017) shows 100 dwellings per annum for Southleigh in years 2025/26, 2026/27, 2027/28, and 800 for 2028/29 - 2035/36 giving a total of 1,100 in the plan period.

The AONB designation is a valid reason for discounting a site in the SHLAA.

## Evidence Base - Solent Waders and Brent Goose Strategy

1 response was received regarding this topic

### Summary of key comments raised by residents and other stakeholders

The Draft HBLP 2036 contains a document entitled "Solent Waders and Brent Goose Strategy (November 2010)" as part of its evidence base. This document is a high-level strategy document which does not include any quantitative data (i.e. maps of important Brent Goose sites); as such, it does not contribute anything to the plan.

The Local Plan (Allocations Plan) (July 2014) included a document entitled "The Status of Solent Waders and Brent Gosse Strategy Sites in Havant Borough". This document contains survey data from 2015/16; this shows much of the land in south Havant as important for Brent Geese. This information should be part of the evidence base for the HBLP 2036.

### HBCs proposed way forward for Regulation 19 HBLP2036

The updated Solent Waders and Brent Goose Strategy (2018) will be published in due course. The Draft Local Plan's approach to the Solent Wader and Brent Goose network was based on the emerging strategy. Once published, the strategy will inform the Local Plan as part of its evidence base. The data in the 'status of...' study has informed the new strategy.

## Evidence Base - Sustainability Appraisal (SA)

12 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

Questions raised over the integrity of the SA process.

It is felt that sites are looked at singularly; therefore, the combined effect is missed.

There should be an independent and critical oversight to discourage the view that the SA amounts to nothing more than a tick-box exercise.

In almost every case, the impact on green infrastructure, ecology, rising sea-levels and surface water flooding is documented as a matter to be resolved through mitigation.

The EA does not agree with many of the assessments against objective 5. The SA should be revisited once further evidence is available to inform decisions regarding the sustainability of sites in terms of flood risk.

The evidence base which underpins the plan is acknowledged as incomplete, the following need urgent action:

- Borough-wide Transport Assessment (TA)
- Hayling Island Highways and Transport Infrastructure Assessment
- Havant Borough Biodiversity Strategy
- PUSH Air Quality Assessment

### H22 - LAND SOUTH OF LOWER ROAD

Any appraisal that does not identify when a line has been crossed, that rules out development options, is itself unsustainable.

The Local Plan Housing Statement (LPHS) Sustainability Appraisal showed there was no account taken of the impact on the Conservation Area. The Council's Conservation Officer confirmed he was not consulted.

A state of the art Sustainability Appraisal should include social and cultural assessments; as such, any plan that does not safeguard and/or enhance heritage assets will be less sustainable.

### UE54 - SOUTHMERE FIELD

The site was identified as an "uncertain site" but is now a "discounted site" in the Draft HBLP 2036.

On 20<sup>th</sup> March 1980, a covenant was placed on the land to prevent future development; this should not be overturned.

It is sacrilege to destroy such a valued and irreplaceable piece of land with all its diversity for houses.

There are many more pieces of land available in the Borough for house building.

The Supreme Court in April 2017 made a landmark ruling relating to cases in Suffolk Coastal and East Cheshire Local Authorities - the upshot is that out of date policies for the supply of housing would not necessarily override environmental policies.

The site contains Grade 1 (BMV) agricultural land and is used for pasture and hay. The site forms part of Langstone's agricultural history.

The site is an ancient meadow which has not been ploughed nor artificially fertilised since Victorian times. Moreover, ancient meadows:

- Are highly threatened environments which have declined by 97% since WWII
- Are of conservation concern, as such the Wildlife Trust and Plantlife, with the patronage of the Prince of Wales, have banded together to recreate such meadowland

To support Central Government's "Green Future: Our 25 Year Plan to Improve the Environment", the site should remain an undeveloped meadow.

The site is categorised as "uncertain" and a Secondary Support Area for solent waders and Brent Geese in adopted Policy DM23 and proposed Policy E17 respectively.

The site's highly diverse flora is a rich food source and attracts much wildlife, including the red-listed Curlew, Lapwing and Oystercatchers.

The UK hosts up to 25% of the global population of Curlew. In addition, Curlew:

- Have declined nationally by 64% over the last 30 years
- Are at risk of global extinction/is "globally near-threatened"
- Are listed in the Birds of Conservation Concern 4 (BoCC4) report
- Require safe high tide resting and feeding grounds
- Are found on Southmere Field far more than any other of the Langstone shore
- Are shy so will require the whole field for solitude, resting and feeding; mitigation within residential development (i.e. retention of hedgerows and trees etc) will not suffice

A Wildlife Study has not yet been carried out for Southmere.

In November 2017, the EA submitted a planning application for the managed realignment at Southmoor. The protected 9+ hectares of grazing marsh (west of Southmere) is likely to attract more birds to the area, including Southmere Field.

The managed realignment at Medmerry (West Sussex) saw the numbers of Dunlin, Curlew, Oystercatchers and Redshank increased between 2014 and 2016.

The Langstone Harbour Board responded to the EA's application stating that high tide roost sites for wintering birds is a habitat most urgently required.

Paragraph 14 of the NPPF states that '*Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless specific policies in this Framework indicate development should be restricted*'. Footnote 9 clarifies such restrictions include Birds and Habitats Directives (Paragraph 119), SSSI and AONBs.

Paragraph 119 of the NPPF states that '*the presumption of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitat Directives is being considered, planned or determined*'.

It is not yet clear how the proposed EA managed re-alignment scheme, due to be implemented in 2018, would affect the area in terms of flooding; this will need to be monitored for some years to understand its effects on neighbouring land, i.e. Southmere Field.

The deep soil across the fields, high levels of organic matter and excellent porosity arising from the deep roots and earth worm activity means the field can return high amounts of water: the field acts as a sponge in winter and holding tank in the summer. Development would, therefore, increase flood risk.

It is believed that the pasture field west of Southmoor and adjacent to Southmoor Lane is designated as a Local Nature Reserve (LNR).

Southmoor, Southmere Field, Langstone Meadows and fields south of Wade Court/Lane form a linked network/wildlife corridor that should be preserved.

Southmere is a central part of the "green corridor" linking Broadmarsh Coastal Park with the Chichester Harbour AONB and, as such, Langstone and Chichester Harbours which are designated as a SPA, SAC and Ramsar site; the former is also an SSSI.

The Southmere Field "gap" emphasises the historic core of Langstone to the south and the predominantly post-1900 urban sprawl extension of Havant to the north.

The Mill Lane Conservation Area Appraisal (December 2017) states that the adjacent open areas form an important component of the setting of the conservation area and that the views into and out of the Conservation Area add to the character of the area.

There is an important visual and historical connection with Southmere Field and the Mill Lane Conservation Area to the south, where the associated former six-storey mill was worked until 1912. The whole field, therefore, forms the necessary setting for the Conservation Area.

The north wall delineates the northern boundary of the conservation area from the open field. This has a strong visual presence in views from Langstone Road separating the different character of these land uses.

The site makes a significant contribution to Langstone's sense of place, local distinctiveness, well-being and identity, as well as a vital part of the setting of the two Conservation Areas of Mill Lane and Langstone.

The Landscape Capacity Assessment indicates that Southmere Field (Land parcel 41.4) has a "medium-high" capacity for development; this assessment is unreliable as it does not consider the scale of passing public, the field as a recreational gap, the Hayling Billy Line and Solent Way/Wayfarers Walk, the importance of trees and vegetation, the high quality of approaching landscapes from the east, south and west, as well as the wildlife life value. As such, the visual and landscape sensitivity of the area is "high" or "substantial".

The Landscape Capacity Assessment has failed to understand the historical significance of the field and the link between the farmhouse to the north and Mill Lane Conservation Area to the south.

The site should be permanently deleted as it meets the criteria recorded in Policies E1, E2 and E4. These policies emphasise the importance of:

- Establishing and analysing data about air quality
- Green infrastructure to create, protect and enhance biodiversity
- Green spaces that relate and are special to the local community in terms of their beauty, historic significance, recreational value and tranquillity and/or richness of wildlife

The site is an important carbon sink helping to counter carbon dioxide emissions and absorbing some of the increasing traffic noise from the A3023.

Hampshire County Council's (HCC) October 2014 '*Strategy for Temporary Traffic Management at Street Works and at Works for Road Purposes A3023 Langstone and Hayling Island*' states:

- Traffic flows on the A3023 can be particularly heavy
- Any disruption to traffic flow on the A3023 within Langstone, and on the Hayling Island Bridge, impacts very quickly on other roads in the area because of the traffic sensitive nature of these routes
- Of greatest concern is the risk to traffic congestion tailing back into the A27 trunk road, leading to the hazard of stationary or slow-moving traffic on a high-speed dual carriageway

The combination of the regeneration of Havant Town Centre (KS1), Hayling Seafront (KS4) and Langstone Technology Park (KS10), along with proposed development on Hayling Island would lead to adverse impact on the wider road network around Langstone.

The Council has been informed that the site could accommodate 100 to 120 dwellings; such a scale would provide a limited scope for additional landscaping.

The SHLAA (December 2017) referenced the potential for 50 homes on the site. The loss of this greenfield site to 50 dwellings, with its excessive constraints, would be contrary to the housing density policy and could not be justified.

Development of the site would be contrary to proposed policies E10, E15 and E19 in the Draft HBLP 2036.

Development of the site would be contrary to Paragraphs 32 and 118 of the NPPF.

### **UE77 - LAND AT ROOK FARM**

Too often the SA process flags up negative aspects of development whilst not fully considering the positive aspects which could be brought about through new opportunities for housing development.

The findings of the SA for UE77 are broadly comparable to other proposed allocations on Hayling Island the development of UE77 has the potential to perform strongly against a number of sustainability objectives.

Objective 2 - Development would provide 81 affordable dwellings.

Objective 3 - Although the assessment notes uncertainty regarding the safety of the proposed site access, this would be resolved through further detailed design work and a Road Safety Audit.

Objective 4:

- The site has excellent public transport opportunities

- Although the assessment notes that future residents are likely to be dependent on the car, this is likely to be an inevitable finding of any housing site in the Borough

Objective 6 - The Council's Landscaping Team confirmed that they would have no objections to the site's development when responding to the previous application on the land. The uncertainty regarding development and nearby heritage assets could be addressed through a sensitive design proposal.

Objective 8 - the strong negative assessment is strongly contested:

- The SA has failed to acknowledge that a range of tried and tested mitigation measures could be implemented to address any impacts on common and notable species (i.e. bats, birds and reptiles)
- Objection to the ascertain that it would not be possible to identify a suitable mitigation package to address the impact of development on a Core Site for solent waders and Brent Geese

Objective 12 - Southern Water have previously confirmed there is sufficient network capacity to accommodate a housing scheme in this location. Development would maintain the site's greenfield run-off rate and appropriate mitigation would be provided to address any noise, water or air quality impacts.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

The Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help achieve relevant environmental, economic and social objectives. It should be stressed that the SA is an iterative process which will continue to evolve as the Local Plan continues to emerge.

Since the publication of the Sustainability Appraisal of the Draft Local Plan 2036 (December 2017), the Council has been in discussion with the Environment Agency (EA) about undertaking further evidence regarding flood risk. This information, once available, will be used to better inform the assessment of objective 5 of the SA and, as such, the HBLP 2036.

In addition to the above, the SA acknowledges that some assessments are still underway. The findings of these assessments will be used to inform further editions of the SA once they are available.

The above, together with the representations and evidence received during the consultation on the Draft HBLP 2036, will be used to inform the assessments of the next SA.

Please note, Southmere Field (UE54) was not allocated in the Draft HBLP 2036; however, the representations submitted will be used to inform any further assessments of the site in future editions of the SA as it was a site which was submitted for further consideration.

## Evidence Base - Havant and Waterlooville Town Centres Study (October 2017)

1 response was received regarding this topic

### Summary of key comments raised by residents and other stakeholders

There is a substantial amount in the document about pedestrian flow but no mention of cycling movement around the town centres.

Page 65 (Weaknesses, Bullet 3) - This is not surprising, cyclists have been made unwelcome as cycle access has been made difficult.

Page 66 (Opportunities, Bullet 1) - This is supported, but cyclists should also be included.

Page 66 (Threats, Bullet 6) - The distances from housing in Berewood to the town centre are long for pedestrians. A split-level crossing was originally planned, without this, it will be difficult for cyclists to cross Hambledon Road and Maurepas Way

### HBCs proposed way forward for Regulation 19 HBLP2036

The representations made about the town centres study mirror those made for Waterlooville Town Centre (KS2) and the Blue Star (H43). As such, please see the summary tables for KS2 and H43 to view the Council's proposed way forward.

## Evidence Base - Windfall/Unidentified Housing Development (August 2017)

1 response was received regarding this topic

### Summary of key comments raised by residents and other stakeholders

For the plan to be sound (see Paragraph 182 of the NPPF), garden land development should not be included in the windfall assessment.

### HBCs proposed way forward for Regulation 19 HBLP2036

The Council acknowledges that Paragraph 48 of the NPPF states that development of residential gardens should not be included in historic windfall delivery rates and expected future trends. However, the paragraph also states that *“Local planning authorities may make an allowance for windfall sites.... if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply”*. The windfall analysis shows that 7.5% (268 dwellings) of total net completions from 2006/07 to 2016/17 have been from the development of residential garden land. As such, the Council considers this as compelling evidence and justification for their inclusion in expected future windfall trends.

## Hayling Island (General)

51 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Comments about Hayling Island Seafront regeneration - please see table on 'Hayling Island Seafront (General)'.

Concerns in relation to local road network:

- Traffic congestion, gridlock - related journey times and delays
- Road safety - concerns in relation to visibility / road suitability, regular accidents, increase in crashes on bends and road casualty figures despite the introduction of 30mph speed limit.
- Visitor traffic during summer and weekends - need to conduct surveys during the summer
- Poor transport links
- Road links are over capacity
- Driver behaviour - not allowing cars in / out
- Roads cannot be widened without considerable cost
- Improvements to Tournerbury Lane not carried out
- Minor schemes to improve pinch points will do nothing to address the fundamental issue that the road has already reached saturation point.
- The A27 and A3023 cannot be widened and are already “clogged”.
- Has any survey been done to establish that the main road on Hayling Island can cope?

Many of the housing sites in the Draft Local Plan only appear to have one highway access point which is not acceptable as it will concentrate impacts and provides no second emergency access point. These will also cause local congestion points.

Average annual traffic flows are already in excess of Government thresholds for safe highway capacity and these thresholds are further exceeded in summer months when the Islands population increases, and additional trips are generated to access the Islands facilities. In the summer months residents already experience a minimum of 30 minutes delay in peak hours when seeking to travel to work off the Island. Delays at weekends and summer evenings can see traffic backing up along the whole length of the Islands main spine roads with delays of well over an hour experienced by residents and tourists.

The Authority should take a more holistic approach and consider what the area has to offer to its visitors and then build a robust and focused tourism strategy to deliver that vision. The 1996 partially implemented tourism marketing strategy should be revived with a focus on engendering carbon neutral sports, Sportif au Natural which would give the area a unique marketing edge. Hayling as the birth place of windsurfing could be used as a central theme of a wider embracing policy to encourage environmentally friendly sports.

A museum celebrating Hayling as the birthplace of windsurfing could be an excellent fulcrum and this enhanced profile will give a worldwide status to the Island.

Evidence shows there is much seasonal variation in the number of daily vehicle trips attracted to the seaside destinations and therefore the challenge is to maintain the resilience of the highway network for both residents and visitors.

Regeneration efforts will be irrelevant if visitors and residents can't get to/from Hayling Seafront.

No sustainability assessment appears to have been produced by Havant Borough Council to consider the implications highlighted in this report in relation to congestion and air quality issues.

Issues in relation to accessibility:

- Need for affordable bus service
- Limited bus services
- School buses cancelled
- Need for rapid transport network
- Improvements to secondary road network
- There is no longer a railway service

- Prioritise cyclists and pedestrians
- An effective network of off road cycle ways linking to all parts of the island is essential.
- A park and (cycle ride) from Havant together with an effective ferry service to Portsmouth could mitigate the damaging impact of an increased car visitor number on an already congested road system. A Boris bike scheme for this link and the Island could be self funding and be encouraged.
- A specific upgrade to the footpath from the Sinah Gunsite to Hayling ferry is required to be included in the plan.
- Need for sustainable / green transport options
- No direct bus service between West Town and Mengham
- Additional bus services may help in off peak periods but new services will be caught in the existing peak hour congestion.

#### Concerns in relation to access onto the island

- Single access on and off the island cannot cope
- Adverse impact on the A3023 as a result of development
- Traffic flows already in excess of capacity and cannot accommodate further traffic growth without very severe impacts.
- Affected by floodplain
- Single carriageway restricts traffic flow
- Rebuilding/dual carriageway would be expensive
- Delays caused by lorries / cyclists
- Potential to jeopardise access to emergency service vehicles
- Concerns in relation to condition of bridge / purpose originally intended - expect details of refurbishment to be included in transport work
- Second access needed including a second bridge adjacent to the present one
- Need second road onto Hayling (routing suggestion made)
- A bridge network in the area of the Hayling Ferry
- A new foot / cycle bridge
- Adverse impact on tourism
- Request to see traffic surveys
- Inspector's report on previous Local Plan recognised that "...growth on Hayling Island should be limited/restricted, to take account of .... access difficulties on the local road network at peak hours"

Hampshire County Council recognises the transport constraints of a single road access via the A3023 Langstone Bridge onto and off Hayling Island.

Before any further encouragement of housing or tourism the road access onto Hayling needs to be widened. Can Hayling cope with further car access without becoming gridlocked? Suggestions:

1. Widen the bridge by one lane and alternate the traffic two lanes on or two lanes off the island according to time of day. This would need to be done in conjunction with widening the central spine road (A3023) to avoid shifting congestion from one point to another.
2. Rebuild the railway (as DLR in London) from the old station (HIADS theatre) with frequent stops and car parks and terminating at Havant station. A network of mini-buses feeding the railway would lessen car use. Would people use it or still prefer to drive?
3. A complete rebuild of the bridge to include cycle, car, bus and rail lanes
4. Build a bridge on the line of the old rail bridge to take cycles, taxis, buses and emergency vehicles only
5. None of the above. Keep it difficult to get on and off to discourage further development and therefore overpopulation and congestion.

Cycling on the island but must improved but reservations in relation to the off road north / south cycle path.

1. Will it be street lit, enabling year-round use?
2. Will the surface be gritted in winter, again enabling all year use?
3. Will it be a fast route? If these considerations are not met, then commuters will remain on the road especially during the winter months.

Provision should be made for cyclists alongside the road network, with weekenders still able to access the Billy trail for a nice steady ride. The cost of developing a fast commuter route alongside the existing carriageway could easily be recouped from the planned developments. Cycling provision should be

facilitated by widening the main road so that it will be treated in winter, street lit and maintained as the main carriageway.

The island needs an additional:

- Road bridge (i.e. West Hayling to Southsea like the Poole Twin Sails Lifting Bridge)
- Pedestrian/cycle bridge between Hayling and Langstone

There is very limited potential to enhance local roads to accommodate existing and future predicted traffic flows. Small scale junction improvements may help provide local access to new development sites but will not address the severe constraints of Havant Rad and the Island's only bridge access.

Residents will want to know the rate of traffic increase over the years, and how the local road network will be affected once any housing, tourism and employment sites included in the Local Plan have been developed.

Detailed submission in respond of traffic conditions and impact of development.

It is not clear how any transport improvements identified on the A3023 through the specific Hayling Island transport modelling and borough wide TA will be secured or delivered.

Issues in relation to A3023:

- Speed limit recently reduced from 40mph to 30 mph
- Blind corners
- Narrow carriageway
- Visibility restricted by vegetation
- Inconsiderately parked vehicles
- Delays caused by lorries / cyclists
- Issues in relation to traffic light signals at various points
- Unsuitability of diversions via Northney Lane / Daw Lane - narrow country lanes
- Most bus stops not off the carriage way
- Adverse impact on tourism
- Need for a detailed future plan for A3023
- Traffic figures are still awaited
- Inability to cope with additional traffic must be considered in planning for additional homes
- There is nothing the Council can do to create additional capacity
- Access to the A3023 could be a reason as to why the Annual Watersports Festival has moved.

Delete reference to 'using the Hayling Island microsimulation model' following Transport Assessment in site requirements because all proposed allocations will have already been included in the HBC microsimulation model runs to 2036. There is not a need for the developer to run the model again for the same site allocation. Query whether developer can be required to use a specific transport model.

Issues in relation to West Lane:

- Blind corner adjacent to entrance on Havant Road
- Concerns in relation to amount of traffic
- Too narrow
- Need for bypass to reduce traffic through West Town

Issues in relation to cycle paths:

- Need for all weather surface on the Hayling Billy trail - not usable in wet or winter
- Improvements to cycle paths would have no significant impact on road congestion
- Plan does not reference improvements to pedestrian and cycle paths
- Suggestion for 2<sup>nd</sup> cycle route from Church Road to Northney

Parking issues:

- On-street parking
- Access for emergency vehicles
- Need for Electric Vehicle car charging points
- Trades vehicles parked on streets
- Visitors discouraged by Council run car parks

- Inadequate parking within new development

Issues in relation to Hayling Island ferry:

- Need for a bridge / car ferry from Southsea to Hayling Island
- Ferry is essential infrastructure
- Important for school children
- Forms part of the national cycle route
- Regular bus services to ferry essential
- Clarify HBC's intended arrangements for ensuring the Hayling ferry can continue to run
- There is no mention in the plan of integrated transport at the Hayling Island Ferry.

Concerns in relation to emergency services:

- Response times - attendance in good times
- Demographic - older people with related health care needs
- Potential to jeopardise access to emergency service vehicles
- Issues for access with narrow streets and congested roads
- 11 South Central Ambulance vehicles every 24 hours
- Concerns in relation to lack of policing - crime, vandalism and speeding

Concerns in relation to infrastructure:

- Infrastructure should be upgraded
- Existing infrastructure is at breaking point
- Current development under construction has not been considered
- Inadequate facilities for the population size
- Services cannot manage / cope
- Transport, utilities and logistics need to form part of the regeneration proposals
- Concern that impact of development cannot be adequately mitigated

Issues in relation to infrastructure review:

- Further infrastructure work should be undertaken before any further development takes place / any decisions are made
- Object to publication of Local Plan before the infrastructure review is completed / plan cannot be finalised
- Concerns that the infrastructure review is taking too long
- Residents should have the ability to comment on that completed review
- Mitigation solutions should be evaluated and implemented before any further development takes place
- Need for investment in infrastructure before development is permitted
- Unique geography of Hayling Island requires specific analysis
- The evidence base will not change the problems of further development on Hayling Island
- The infrastructure plan needs to be concise and understandable, and address all the opportunities and risks and present a road map for the future of the community
- Specific concerns about the review of waste water and primary health

The Borough-wide Transport Analysis/Assessment (TA) and the Hayling Island Highway and Transport Infrastructure Assessment is the critical missing piece of the plan.

The Infrastructure Delivery Plan should consider the mechanisms for funding transport schemes on Hayling Island.

Comments on the consultation:

- Conducted too early - it is felt that "residents are wasting their time"
- Consultation responses not taken into account
- A further focussed consultation should be held for housing allocations on Hayling Island

Comments in respect of the Hayling Infrastructure Advisory Committee:

- Offers to help examination of services have not been followed up

- Concern that traffic survey was not discussed or agreed with Advisory Group members
- The Group has not completed its work, dependent upon the production and publication of Hampshire County Council's Highways Assessment.

Hampshire County Council recognise that in the absence of the borough wide TA there is currently uncertainty as to whether the level of development proposed on Hayling Island is acceptable.

Comments in relation to approach to development on Hayling Island:

- Objections to further development on Hayling Island
- Concern there is no mechanism to stop development coming forward
- Plan will not limit or control development for the future
- Categorisation of Hayling will lead to piecemeal development and improvements to infrastructure
- Growth cannot be sustained / will put undue pressure on area
- Concerns in relation to overdevelopment
- Object to any development except for small scale infill development
- Housing development will adversely impact on Hayling Island
- Hayling Island cannot support more housing. It should be treated as a special case
- The plan lacks anything which might be seen as a core idea of what Hayling Island should be, other than a building site for new housing
- It is not supported that the housing plan has increased from 550 to 1000 new dwellings through to 2036
- The Cabinet Report (18<sup>th</sup> December 2018) states that until the uncertainties on Hayling Island and Langstone are fully answered, no further development, on top of that which has already been allocated should take place

Comments in relation to brownfield / windfall development:

- The Council has not taken windfall into account / underestimated the amount of further housing growth
- The focus on brownfield sites on Hayling is overstated; the percentage of brownfield content is tiny
- Question as to whether the accumulation of all current and anticipated "windfall" sites has been taken into account.

Impact on ecology, flora and fauna - detract visitors from the island.

Adverse impact on the Island's character.

Suggestions that Hayling Island should be treated differently from the rest of the borough due to its unique environment.

Concerns in relation to the impact on quality of life / residential amenity of existing residents.

Loss of agricultural land/greenspace, impact on the viability of farming.

Building on greenfields in South Hayling will not enhance rights of way / footpaths - it will turn a rural walk into a rural walk through a housing estate.

Comments in relation to open space / recreation:

- Inadequate / insufficient provision playgrounds / play parks
- Lack of facilities for different groups - young people, older people, and tourists
- Community facilities mainly for older people
- Suggestions for open air music venue / cultural and entertainment centres / open town centres meeting places
- Related impact on health

Issues in relation to watersports:

- Niche market
- Expensive
- All round activity (not just the summer)
- Visitors do not use existing facilities
- A campground would encourage visitors to stay for longer

New housing is not affordable / does not meet a housing need.

Issues in relation to education:

- Schools operating at full capacity, not enough school places
- No space to extend Mengham Primary School
- 17 and 18-year olds forced to travel off the island

Matters in relation to healthcare:

- Doctors and dentist surgeries are oversubscribed - not accepting any further patients
- Concerns in relation to wait for doctor's appointment, 2-3 week wait
- Concern that GP to patient ratio is not representative of the situation
- Concern that Queen Alexandra Hospital is not able to accommodate patients
- Ageing population and chronic illnesses mean that Hayling Island has unique requirements for healthcare
- Concerns in relation to poor air quality

Comments in relation to shopping provision:

- Inadequate shopping provision on Hayling Island (even now with the approved Lidl development)
- Shopping at Mengham and West Town is limited
- Banking facilities very limited
- Residents travel off the island for shopping and leisure

Comments in relation to water supply:

- Water pipes regularly burst due to flow and demand issues
- Holes in the road to sort water problems
- Low water pressure continues to be a problem

Concerns in relation to electricity supply, power outages.

Comments in relation to waste water:

- Concerns over sewage disposal / sewer system
- Only one pipeline off the island to the mainland
- Reliability of Victoria Road pumping station
- Pumping stations should be fitted with generators
- Concern that flood prevention projects require Government funding

Plans to flood three areas of Hayling Island (at Tournurbury, Northney and Stoke) because of development elsewhere in the Solent means:

- The island will be made even smaller
- It will be impossible to provide alternative habitat for wildlife

Limited employment opportunities mean that residents have to travel off the island for work, suggestion that Hayling Island is not suitable for younger people/first time buyers.

Comments in relation to planning gain:

- Community benefits should be secured alongside new development
- Developer contributions are not likely to be enough to solve infrastructure problem
- Council tax is not reinvested back into the island
- CIL should be used towards A3023 improvements
- Hayling Island hasn't seen any of the CIL money
- Developer contributions should be spent locally

### **HBCs proposed way forward for Regulation 19 HBLP2036**

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage.

The draft Infrastructure Delivery Plan (IDP) which was published alongside the regulation 18 draft of the Local Plan, identifies deliverable solutions for 30 different types of infrastructure with the notable exception of transport. The following matters raised are considered in detail through the draft IDP:

- **Transport** - Buses, walking and cycling, and Hayling Island ferry
- **Emergency services** - Ambulance and Police
- **Green & Blue** - Open space and playing pitches, coast including flood risk management and defences, SUDS and other drainage systems, green routes including public rights of way and ecology including SPA
- **Social** including leisure (built sports facilities) and community centres
- **Health** - Primary care (GPs and health centres) and Acute care (hospitals)
- **Education** - Schools (primary and secondary)
- **Utilities** - Water supply, electricity, waste water and sewage disposal

Further evidence required:

The Hayling Island Highway and Transport Infrastructure Assessment will provide a detailed analysis of the entire highway network on the island using a microsimulation. The results of this work will enable the Council to look at measures to maintain and improve the island's highway network functionality.

Once the borough-wide Transport and Hayling Island Highway and Transport Infrastructure Assessments are completed, the draft IDP will be updated to reflect and incorporate the recommendations from the transport analysis.

A sub regional assessment of air quality following proposed development is underway which will examine the impacts on human health and European sites.

The emerging Havant Borough Playing Pitch, Sport and Recreation Strategy will provide an assessment of the borough's sport and recreational facilities, and will inform the revised version of the IDP.

Investigate whether there is a need for additional research in respect of tourism and the visitor economy.

In addition to the above, the following policies in the Local Plan set out how proposals should respond to site-specific impacts through the development management process:

- Impacts on the local road network, using the microsimulation model (IN3)
- Ecology (E15)
- Flood risk and drainage (E12 / E13)
- Landscape and Townscape (E10)

Comments where no change is considered necessary:

As set out above, a draft version IDP was published alongside the regulation 18 draft of the Local Plan. The Council considered it necessary to consult on a draft version of the HBLP 2036 and IDP in advance of the transport work being complete for a number of reasons including:

- The existing Adopted Local Plan is out-of-date
- The Council does not have a five-year supply of housing
- Developers are already proposing development and looking to submit planning applications - such as the recent Developer Consultation Forum at Sinah Lane
- An appeal inspector (reference 3155488) was able to acknowledge the Council's progress on the Local Plan and its positive approach and dismissed the appeal as a result. Maintaining progress on the preparation of the Local Plan puts the Council in the best position to manage speculative development prior to the Local Plan's adoption.

The Draft Local Plan clearly acknowledges the unanswered questions on transport, and indicates that development proposals on Hayling Island and Langstone should continue to be resisted. The site allocation policies included within the Draft Local Plan are only intended to provide a starting point on the detailed points that should be considered on the site, and do not change the Council's position that development proposals on these sites should be resisted whilst uncertainties remain regarding transport. There is a large text box above every proposed allocation on Hayling Island setting this out.

The purpose of the Hayling Island Infrastructure Advisory Committee is to provide on the ground advice regarding infrastructure capacity on Hayling Island. Forthcoming meetings will have the opportunity to review the emerging findings of the Transport Assessment and sub-regional assessment of air quality.

Matters relating to transport and parking in new developments are considered as part of Policy IN3. The management of the Council's car parks is not a matter for the Local Plan.

The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.

When considering which greenfield sites are suitable for allocation, the council has sought to prioritise sites of a lower agricultural quality. However, the available evidence is that the majority of land in the borough is of the best and most versatile quality (BMV). Therefore, the allocation of housing sites on BMV is unavoidable if the borough is to meet its housing need.

In seeking to provide access to good-quality open space, Policy E2 also requires new open space alongside residential development of over 50 dwellings. Where larger allocated sites on BMV, the Draft Local Plan identifies a need for the development to include community growing provisions such as allotments as part of the open space provision in line with Policy E19.

Policy E1 promotes public health and enable people to live a healthy lifestyle by seeking to retain open spaces, including children's play spaces, which are valued by local communities.

Housing affordability continues to be a significant challenge across the borough, including Hayling Island. There is a need to increase the supply of homes to keep pace with the need for housing. Policies H2 and H3 set out the Council's approach to securing homes of the right size and tenure, whilst Policy E7 sets out how the Council will secure suitable homes for a wide range of occupants.

Developer contributions towards local infrastructure are secured through a combination of section 106 planning obligations and CIL. In terms of the latter, all developers are required to pay a proportional charge which is used towards the cost of infrastructure provision needed to support the development of the area. CIL is used to fund additional infrastructure at a borough wide scale, although there is freedom for a proportion of CIL is to fund smaller neighbourhood projects as well. The viability of the plan policies, alongside CIL is considered in detail through the Local Plan and Viability Study.

## Is there another site which should be noted as a Local Green Space?

35 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### **Please also see table on 'E4 - Local Green Spaces'.**

All allotments in the borough.

#### **Southleigh Strategic Site**

The eastern edge, and north to south of the strategic site, Southleigh.

The green strip through the centre of the Southleigh development - extending from Hollybank Woods.

#### **Emsworth**

The western corridor of the River Ems - fields between Westbourne and Emsworth.

Southleigh Road Recreation Ground.

Horndean Road Recreation Ground.

The Old Hospital Garden at the Victoria Cottage Hospital site.

Warblington Road allotments.

Allotments off Washington Road.

Redlands Grange allotments.

Victoria Road allotments.

"The Horse Fields"- opposite the Brookfield Hotel / fields south of the A259 which form part of Warblington Farm.

Fields along the Solent Way between Emsworth and Warblington (H23F and H23E).

Land around Warblington Church and Farm (H23C and H23D).

Southleigh Park.

Redlands Grange allotments and Warblington Road allotments at Washington Road.

Ems Valley Corridor (East Hampshire Strip/Sussex Border Path) including field east of Westbourne Avenue.

Land at Westwood Close (Policy H10) - also see 'E4 - Local Green Spaces' summary table.

#### **Leigh Park**

Stone allotments.

St Clares Wood, off St Clares Avenue

#### **Waterlooville**

Purbrook Woods, off Purbrook Heath Road

Gundymoor Wood, off Purbrook Way

Covert Grove (also known as Frenstaple Woods), off Frenstaple Way

Stakes Coppice, off Holst Way

Hurst Wood, off Dornmere Lane

#### **Hayling Island**

Hayling Billy Trail

Stoke Common and Stoke Woods

Northney Recreation Ground

Land east of Footpath 102, including Tournerbury Golf Course

Existing agricultural land to east and west of Northney village and Copse Lane

Existing agricultural land to east and east of A3023.

**HBCs proposed way forward for Regulation 19 HBLP2036**

The Council will consider the suggested sites and whether they should be designated as Local Green Spaces as defined by Policy E4 in the Regulation 19 HBLP 2036.

It should however be noted that the NPPF is clear that the designation should only be used where it is not an extensive tract of land (paragraph 77).

## Sites Not Included in the Plan

15 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### Sites put forward for housing

Hayling Island College Sports Field, Church Road, Hayling Island should be considered for residential development. Adjacent to UE47 so could add value there.

Southmere Field (UE54), Langstone should be considered for inclusion in the HBLP2036.

The old Post Office site on East Street would be an excellent location for older peoples housing.

Brockhampton West should be considered for employment uses.

Hazelton Wood (UE8), Cowplain should be considered for inclusion in the HBLP2036.

Rook Farm (UE77) should be considered for inclusion in the HBLP2036.

Mengham Estate (proposed extension to H29 Land north of Selsmore Road) should be considered for inclusion in the HBLP2036.

Land south of Long Copse Lane (UE46) should be considered for inclusion in the HBLP2036.

Land south of Havant Road (UE11) should be considered for inclusion in the HBLP2036.

Land North of Oysters, Hayling Island should be considered for inclusion in the HBLP2036.

#### Sites put forward for employment

Brockhampton West should be considered for employment uses.

#### Sites put forward for housing and employment uses

Land at Hulbert Road (UE69) should be considered for inclusion in the HBLP2036.

### HBCs proposed way forward for Regulation 19 HBLP2036

The suitability of the following sites for inclusion in the Regulation 19 HBLP2036 should be considered:

- Hayling Island College Sports Field
- Southmere Field, Langstone
- Brockhampton West
- Hazelton Wood
- Land at Hulbert Road
- Rook Farm
- Mengham Estate
- Land south of Long Copse Lane
- Land south of Havant Road
- Land North of Oysters

Comments where no change is considered necessary:

Whilst the Council would welcome the inclusion of the old Post Office site on East Street, the Council would need evidence to demonstrate that the site is available i.e. from the landowner/agent, in order to consider it for inclusion in the Regulation 19 HBLP2036.

## The way we are running the consultation

36 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

#### General

The Council does not wish to have lots of feedback on the Local Plan.

Consultation is a tickbox exercise.

Responses to previous consultation responses not taken into account.

The Council has made it difficult to respond - this has happened before and will happen again.

What was the point of the consultation evenings? The vast majority of people have been ignored.

Consultation orchestrated and weighted in HBC's favour.

Impossible to assimilate all the information during the consultation period.

Comments on the Draft Local Plan should bring about final changes to the document.

It should be shown that my and other local stakeholders feedback how you've taken this on board (rather than just tell us you have). Bring some trust back into our local politicians. We are not against change as residents, we just want the right kind of change and, as taxpayers who pay the salaries of our politicians and civil servants, our views treated with respect and real consideration.

Unfulfilled assurances and promises on other projects/policies, and subsequent changes to planning details after approval, leave local stakeholders with a mistrust and lethargy for the system, so also consult and publicise fully any subsequent changes.

#### Use of website

There is lots of detail and supporting evidence online.

The consultation excluded those who do not have access to the internet.

Difficult to make comments without access to a computer.

Older people do not have computers.

Could not find booklets on the website.

Local Plan is very difficult to view on a home computer, tablet or smartphone.

#### Online survey questionnaire

Found the online consultation survey difficult / unwieldy to use - think of an alternative app for next time.

Serious flaws in the way the survey is being conducted on the Council's website.

Concern that people are restricted to responding to specific aspects of the plan - there should be an opportunity to respond generally to the plan. Deliberate ploy to put people off responding.

Digital questionnaire makes it harder to comment on the whole of Hayling Island.

Feedback forms unwieldy and not addressing the "umbrella" view.

The questions are purposely asked in a way that the Council wants them to be answered.

Concern that people do not have computer skills to complete online survey.

The portal is an unwieldy vehicle to obtain individual views on the draft Local Plan.

The question needs to be reworded as it suggests the plan is going ahead. It would read "Assuming the plan is approved what change would you like us to make to improve the plan."

<b>Libraries</b>
Plan was behind the main desk in the library where no one could see.
There is no advertising to tell people plan is there and asking for feedback.
No display in libraries indicating booklets and draft Local Plan available.
The booklets were in a ring binder with the plan rather than separately.
<b>Mailout</b>
Local Plan mailout did not provide information about where or when the draft plan could be viewed - such as it being available in the local library.
<b>Advertising the consultation</b>
Concern that many people were unaware of the consultation taking place.
The council has not advertised the consultation repeatedly or widely enough.
There was nothing in the 'Serving You' publication.
All households should be notified of the public consultation.
Residents unable to respond to consultation they don't know about.
Unaware that exhibitions were taking place.
If HBC planning policy department was a private company it would go out of business because not enough people know they exist.
<b>Site Notices</b>
Few poorly placed and weather-beaten site notices.
Comments in relation to site notices for H48 - Land at Waterloooville Golf Club: <ul style="list-style-type: none"> <li>• [Only] a small site notice on a lamp post on Anvil Close to make residents aware seems to be very poor communication and underhand.</li> <li>• The development will affect every resident in Anvil Close and will directly impact on our property.</li> <li>• Most residents unlikely to see site notice on Grassmere Way unless they were on foot. Concern expressed in relation to method of notification.</li> </ul>
<b>Exhibitions</b>
The exhibition was very comprehensive, and staff polite and helpful.
Good impression from exhibitions - much money had been spent on this and considerable work done.
Representatives were very helpful and helped us to understand the local plan.
Clear and patient explanations were given.
[Portsmouth City] Council is grateful that a local plan consultation event was held within the city boundary at Farlington to provide an opportunity for Portsmouth residents to discuss the emerging Plan.
Older people unable to attend viewings due to transport.
Reading brochures/material in a noisy environment difficult.
The layout of the information boards was clear and easy to read.

The maps at the exhibition did not show two recent major developments on Hayling Island on the display maps.

The exhibition boards have a simple idea of what was planned, there were no key numbers and were squashed into diagrams/maps.

Advised printed copy of the exhibition banners were not available to take away.

### **'Where Next for.....?' Booklets**

An overarching booklet of the strategy plus separate booklets for each areas would have been more widely read.

Booklets useful but few copies were available for the public to take away.

There were no brochures available to take away.

Booklets are helpful but just a summary of the full draft.

### **Exhibition Venues**

Meridian Centre exhibition away from public footfall - leaflets could have been given out to public on the ground floor.

There was no exhibition in Old Bedhampton - suggested venues during the consultation period but was advised that it was "too late" to arrange a further exhibition. Concern that the Bedhampton community who do not drive or do not have access to the internet have been excluded.

A more public and accessible venue could have been found than The Church of the Resurrection.

### **Resident and other community group meetings**

Presentations and road shows from officers at residents' gatherings help.

Presentation in Emsworth good and HBC officers very helpful - 2 weeks to respond after the meeting was not long enough - not enough time to look at the plan in detail.

More should have been done to engage the public at interactive events led by local councillors.

### **Draft Local Plan consultation document**

The present format is not user friendly.

The 300 page document is a formidable challenge for any individual but especially elderly residents.

Local Plan is very large with complicated maps.

It would be clearer if the actual policies were prefixed with 'Policy'.

The legal status of 'How this Works' section should be clarified.

Locations of site allocations are difficult to determine by their description.

Concern that the draft Local Plan draws on the Housing Statement which was not subject to the same consultation processes required of a Development Plan Document such as an Examination-in-Public by an independent Inspector.

### **Evidence base**

Impressive library of comprehensive documents.

The absence of a Transport Assessment is regrettable - residents should see this prior to the Pre-Submission draft.

An incomplete evidence base means that the consultation is compromised and invalid.

### **Hayling Island**

It would be more helpful to have a complete plan just for Hayling to include all the infrastructure review.

HBC have failed with regard to Hayling Island in terms of outreach to young people, loss of tourist office is a missed opportunity for consultation with tourists, and lack of engagement with schools/colleges in promoting Hayling Island as an educational resource.

Information about the sustainability of Hayling Island was unavailable.

Time consuming to locate areas of the plan specific to Hayling Island - information buried in the 359-page document.

### **Suggestions to improve the consultation**

Leaflet drop would be helpful.

No information in the local newspaper - a page in a local publication would be helpful to make residents aware.

Ward councillors did not publicise the exhibition and exhibition with information through the letterbox - the residents' associations, Friends of the Earth, HBRA and CPRE Hampshire worked hard to publicise exhibitions and informed residents of local issues in the draft Plan and advised them how to respond.

HIRA always happy to post on social media, website, in the Islander as well as putting up posters on the Mengham Notice board.

Feedback forms would be helpful.

What strategy has been established to reach those still in education at secondary and sixth form level?

The next draft should show the changes made to the Jan 2018 version to make it easier to comment on.

Cabinet meeting was held the week before Christmas making it difficult for many people to attend.

### **HBCs proposed way forward for Regulation 19 HBLP2036**

This was the first time the Council has consulted on a full version of the Draft Local Plan (Regulation 18) following consultation on the Draft Local Plan Housing Statement (LPHS). Though a number of respondents raised concern that it was not widely publicised enough, there was a good response to the consultation.

There is considerable flexibility open to local planning authorities in how they carry out the initial stages of plan production, provided they comply with the specific requirements in regulation 18 of the Local Plan regulations on consultation. These can be summarised as follows:

- Notify certain bodies (that the LPA consider may have an interest in the subject of the local plan), and invite representations about what the plan should contain
- Notify and issue information to specific and general consultation bodies (as the LPA considers appropriate)
- Notification to residents and businesses as the Council considers appropriate.

Statutory consultees, organisations, residents' associations and other community groups were notified of the Draft Local Plan consultation as specific and general consultation bodies. Individuals and organisations on the local plan mailing list were notified, including those previous respondents to the Draft Local Plan Housing Statement consultation via email / letter. The written notification included detailed how interested

individuals/organisations could get involved with the consultation, including details of the public exhibitions, where copies of the Draft Local Plan and consultation materials were available to view, and how to respond to the public consultation.

As part of the consultation methods set out below, the Council produced high quality tiered content to ease accessibility into the Draft Local Plan such as the *'Where Next for... ?'* booklets. Such consultation materials are over and above the minimum statutory consultation requirements set out above, but the Council recognises the Draft Local Plan is a technical and complex document.

The Council engaged widely using a variety of different methods over and above the minimum consultation requirements within budgetary constraints, in accordance with its commitments in the [Statement of Community Involvement](#):

- **Council website** - The Local Plan page on the Council's website was regularly updated in advance of, during and following the close of the consultation with a copy of the consultation document, and supporting material including evidence base documents were clearly signposted.

The Local Plan page also provided clear instructions on how to respond to the consultation via the online survey, email and post.

- **Exhibition/Displays** - Residents were invited to attend nine exhibitions throughout the borough. A series of banners were on display with Council officers on hand to listen to concerns and answer questions from members of the public. Hard copies of the consultation material, and the evidence base documents were also available to view.
- **Press Release(s)** - On the Council's website as well as local newspapers.
- **Social Media** - A Facebook campaign to promote the consultation on the Draft Local Plan, including posts encouraging residents to attend public exhibitions being held across the borough during the consultation period.
- **Leaflets** - A summary leaflet explaining how residents and businesses could get involved together with a series of *'Where Next for...?'* booklets summarising key aspects of the Draft Local Plan were made available on the Council's website, as well as hard copies being available at the Public Service Plaza, all libraries at the borough and the public exhibitions.
- **Community Networks/Forums** - Council officers attended and presented the proposals at a number of different community and resident association meetings and were available for questions following this.

In addition to the above, site notices were displayed on or close to the site of all the draft allocations proposed in the Draft Local Plan, throughout the consultation period publicising the consultation and details of the public exhibitions.

The Council would also generally include an article in the *Serving You* magazine which is delivered three times a year to every household in the borough (Spring, Summer and Winter). There was no publication date within the consultation period - however, a short item highlighted the forthcoming public consultation on the Local Plan in the *New Year* in the Winter 2017 edition, another short article on the consultation included in the Spring 2018 edition of the magazine.

A number of respondents felt the online survey was overly prescriptive. However, Council officers have however considered each and every comment submitted in response to the consultation, including representations received via the online survey, email and by post.

The online questionnaire was designed to gather meaningful and constructive feedback on the Draft Local Plan. The format of the online survey therefore encouraged respondents to comment on the specific wording included in the plan to inform the Regulation 19 version of the plan. This was deliberate bearing in mind the technical nature of the Regulation 19 consultation will need to focus on the 'soundness' tests set out by Government.

At the Regulation 19 stage, the Council will consider publishing a 'tracked changes' version of the plan to show how it has been updated from the Draft Local Plan.

For the purposes of the next Regulation 18 consultation, consider the following:

- Promote the consultation in the borough's libraries using posters and other displays and make a small poster generally available to resident's groups, community centres and others to display.
- Making copies of 'Where Next' booklets, or other similar material, available to take away.
- Encourage members to promote the consultation.
- Improve the legibility of the consultation document including the site plans.
- Publish a copy of the local plan with tracked changes shown (this could also be relevant at the Regulation 19/pre-submission stage).
- Further engagement with young people.
- Reconsider exhibition venues

# Appendix 1

Site plans of sites not included in the plan







## Hayling Island Infrastructure Advisory Committee Terms of Reference

### **Purpose of the group**

The group is a committee to provide on the ground advice regarding infrastructure capacity on Hayling Island and its links to the mainland. The group will review information and evidence base being produced to inform the Havant Borough Local Plan 2036 and provide feedback on the results and conclusions of those studies.

### **Context**

The group is being formed in specific response to the Adopted Local Plan Housing Statement identifying that the infrastructure capacity issues raised through the 2016 consultation should be fully explored through the new Local Plan. The Housing Statement also highlights that the Council will continue to explore the sustainability of future development on the island through the Local Plan 2036 and its evidence base.

As such, the intention is to fully identify the infrastructure issues which new development could create and to explore what deliverable solutions to these there may be. This will be done by advising and critiquing the evidence base for the Local Plan.

### **Membership**

The group is made up of officers from Havant Borough Council, Hampshire County Council (as Highways Authority) and community groups representing Hayling Island and Langstone.

Hayling Island ward councillors, county councillors and the Cabinet Lead for Strategic Innovation, Infrastructure and Projects will also be invited to meetings. Cllr Michael Wilson will chair the group.

### **Working methods and meetings**

The group will meet approximately every two months and is hosted by Havant Borough Council at the Public Service Plaza. Havant Borough Council will circulate an agenda beforehand and organise the meetings.

Where relevant, other parties, such as infrastructure providers will be invited to attend meetings to input directly.

### **Sharing of information and resources, including confidential information**

All group members are happy to have their contact details (name and email address) circulated.

It is the nature of the issues that work is not yet complete, preliminary data and emerging ideas will be shared and openly discussed. As it is not yet complete, such material is unsuitable for public release and wider discussion. Group members are free to highlight that meetings took place however the content of those meetings and what was discussed must remain confidential.