

Supplementary Information

**HAVANT BOROUGH COUNCIL
COUNCIL
7 December 2016**

Dear Councillor

I am now able to enclose, for consideration at next 7 December 2016 meeting of the Council, the following supplementary information that was unavailable when the agenda was printed.

Agenda No	Item
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47	Cabinet Recommendation - Local Plan Housing Statement
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Deputation:

Members, there is good news and bad news. The bad news is that the Statement appears to be a 'knee jerk' reaction to the lack of a 5-year housing land supply. Consequently the Statement may have little value above providing a 'Developer's Charter'. It may **expose** the Council to a Judicial Review with all the consequent costs and delays. This is **bad** planning.

The **Good News** is that there the pressure is off. There is time to take some remedial action. The threat of a flood of 'planning by appeal' applications has not yet arisen. There is nothing in the pipeline yet and the government have no current plans to change the New Homes Bonus arrangements for the foreseeable future.

So, you can **defer** a decision and take more time to examine the evidence you have available and to gather more evidence on specific matters that have been identified in relation to some of the sites...to take a wider view than housing alone. You can consult specialists, like the Conservation Officer, who has been excluded so far. This can include public engagement with residents who support the need for more housing but have some concerns. It should make the Statement more **robust** and 'yes' it may result in a different conclusion on some sites.

So, the **Bad News**...

The Statement, if adopted, will have no statutory status. If it were subject to review by an Inspector my experience says it would be found **unsound**, either as a whole or in part. Inspectors are not meant to do the work of the LPA.

Looking at UE30 (Land at Lower Road) the Borough has...

- Failed its duty under Section 72 of Part II of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to preserve or enhance the character or appearance of such places... and
- Failed to follow the requirements of Section 12 of the NPPF in relation to the protection of heritage assets. LPAs cannot 'cherry pick' from this guidance.
- The Local Plan Inspector balanced the need for possible development of Lower Road against the availability of other land not so constrained. He identified safeguarding the Conservation Area as sufficient reason to exclude the land and this **material consideration** has been overlooked. The circumstances today are similar.
- Developing a substantial part of the adjacent historic coastal agricultural land will irrevocably destroy the setting of the Conservation Area. It is **not** sustainable development.

- You cannot reach the site without passing through the Conservation Area. This will exacerbate **known** safety problems. 2 Blind and 1 restricted view corners and very limited turning space from the main road are incapable of solution. To be advised otherwise is to **mislead** you. Recent surveys show that traffic will double through the Conservation Area. This will adversely impact on visitor safety and amenity and will destroy its character. Entry queues will double and back immediately onto the B2177/B2149 4-way mini roundabout where serious accidents have been recently recorded. No account has been taken that movement through the blind corners where the road is shared by all users will exceed the government guidance in Manual for Streets another **material consideration**.
- The Statement **ignores** parts of the evidence base available during its preparation on wildlife, evidence which has emerged since representations closed on traffic and the soon to be done review of the Conservation Area.
- An ecologist's report of July this year, commissioned by the Borough, identifies UE30 as suitable for providing mitigation measures that would enable development to proceed on land known to be significant for Brent Geese. Further surveys are currently taking place.
- The Local Plan identifies land opposite the A27 at Harts Farm Way (BD11) known to be **significant** for Brent Geese as employment (650 jobs). The real prospect of no opportunity for mitigation and losing these jobs could be an unintended consequence of having 50 dwellings on UE30. There are many more opportunities for housing than employment.
- The total number of dwellings suggested for early release sites significantly exceeds (by approximately 30%) what the report says is needed for a 5-year supply. UE30 is less than 4% of this and less than 0.6% of the total needed. Omitting UE30 will have **no** significant impact on housing delivery.

In conclusion:

Members often like analogies. Well, this is like fielding more players than you need to start a game, some of them have no kit, some of them are still to pass the medical and some would be better playing a very different sport.

I/we have a simple desire to see UE30 dropped altogether for the cumulative reasons I have outlined and I think a proper up to date review will provide this.

Thank you for listening.

Sites in Emsworth

I speak on behalf of the Emsworth Residents' Association.

According to the National Planning Policy Framework, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.

We believe that the environmental aspect of the NPPF is largely dismissed in the Sustainability Appraisal of the sites proposed for Emsworth. By ignoring this issue the planners are in danger of throwing out the environment baby in favour of keeping the economic bath water.

Although Havant Borough Council and developers may wish that the space can be found for these additional homes, we believe that the reality is radically different-that the space does not exist for such a number. Individual land owners may well be happy to offer sites for consideration, but if they are not inherently suitable for sustainable development being proposed does not suddenly make them suitable.

Consider those sites north and south of Long Copse Lane (UE39, UE50, UE67).

Long Copse Lane is a narrow winding single lane with no footpath. There is no public transport servicing that road, so the only transport would be private cars, to access the nearest facilities of Westbourne and Emsworth. Planners may well say that their sites are planned to be sustainable, and encourage walking and cycling, but such a dramatic increase in private transport would effectively deter walkers and cyclists from these sites on such a narrow country lane. Few-if any-parents would risk sending their children to school, either on foot or bicycle, down an unlit road which would also be used by rush hour traffic. This situation would be made even more dangerous in winter.

The other access to these sites would be by Hollybank Lane. There again, the additional traffic generated by the proposed 225 homes would at least double the existing traffic as it is the only access road from the sites apart from Long Copse Lane. Once they get to the end of Hollybank Lane onto Southleigh Road, and turning right to the Horndean Road, the increased traffic can easily congest that junction – especially if the site opposite, UE13, on the corner of Horndean Road and Southleigh Road, is eventually developed. Horndean Road is the principal north-south out of Emsworth, and one of the main routes to the A3.

Furthermore, we would add that the development of these sites would be contrary to the Borough Council's Core Strategy CS9 :

Para 4. 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;

When considering the Strategic Site 2 (land between Emsworth and Denvilles) and site UE02b (Selangor Avenue), the lack of environmental concern is even more compelling. These spaces act as

a vital green corridor, an essential link in open space running from the coast to the South Downs National Park.

What would bring additional families to Havant Borough? Employment? In this year, it has been announced that more than 1000 jobs will be lost. While various bodies, including the Borough Council, are talking positively about attracting other businesses to the area, the results have yet to be seen. It is worth considering that job losses are announced in the wake of, or calculated anticipation of, market changes. Job losses will take place. Job creation is often an aspiration for a better future, but mean nothing until those jobs are actually created and additional workers employed.

We believe that it would be better for the Council and the Borough in ensuring that the sites that they have already granted planning permission for (over 1700 in the Borough) are actually developed than just remaining as a statistic of outstanding permissions. People live in homes, not statistics. Getting these sites developed would go some way to providing some of the affordable homes that are desperately needed, rather than sourcing more sites that may not be developed for years.

Overall, this Local Planning Housing Statement is too ambitious in trying to find sites for an extra 4803 homes in the Borough. It is based on an overall figure of 11250 which was suggested – not demanded – by PUSH which aims to facilitate the ‘duty to cooperate’ amongst the membership. At the heart of the NPPF – and this is direct quote – “is a presumption in favour of **sustainable development, which should be seen as a golden thread** running through plan-making.”

When thinking of an ideal solution, the idea comes to mind of a whole new settlement to the north of Havant, with convenient access to the road network and railways. Such a new development could be planned from scratch with all the required infrastructure to be fully sustainable. However, it soon becomes clear that there is not the space for such a development in what is already a predominately urban borough.

What is lacking in space outside is also lacking within the Borough: there just is not the room for this number.

We fully understand that the Borough has to make a new Local Plan, but would urge you to look again at the figures and the sites. We are confident that a smaller number can be accommodated with a sound and realistic draft local plan that will reflect well on Havant Borough Council, a council that would have responsibly considered the needs of its constituents.