

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

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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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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) ¹ and the Housing Constraints and Supply Analysis ² .
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.

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

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

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<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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA)³ and the Housing Constraints and Supply Analysis⁴. 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>

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

⁴ <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 Analysis⁵ 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 Statement⁶ 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>

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

⁶ http://www.push.gov.uk/work/planning-and-infrastructure/push_spatial_position_statement_to_2034-2.htm

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<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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis¹. 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 Statement⁷.</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)⁸. The partner authorities are committed to working together to address</p>

⁷ http://www.push.gov.uk/work/planning-and-infrastructure/push_spatial_position_statement_to_2034-2.htm

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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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) ⁹ and the Housing Constraints and Supply Analysis ¹⁰ . 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

⁸ <http://www.push.gov.uk/>

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

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

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	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 ¹¹).
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) ¹² . 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 https://www.havant.gov.uk/complaints .
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

¹¹ http://www.push.gov.uk/south_hampshire_shma_final_report_16.1.14_.pdf

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

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	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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	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 ¹³ and a Mitigation programme through the Solent Recreation Mitigation Partnership (SRMP) ¹⁴ , and supports and uses the results of the Solent Waders and Brent Goose Strategy ¹⁵ , 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

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

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

¹⁵ 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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<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>

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
	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 ¹⁶ (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 ⁹ . In future, the Council may have to accept Starter Homes ¹⁷ as affordable housing due to proposed changes in national policy.

¹⁶ 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/>

⁹ 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/>

¹⁷ <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 ¹⁸ 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

¹⁸ 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 ¹⁹ . 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.

¹⁹ <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. https://www.havant.gov.uk/prosperity-havant

Key issues raised by statutory consultees	HBC response
Emsworth Neighbourhood Forum:	
<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"> • Process - need for new local plan and consultation period over summer • Impact on/provision of community facilities - schools, GPs • Concerns over infrastructure • Concerns over the capacity of the highway network • Scale of development • Concerns over impact on ecology/nature conservation • Loss of green space • Concerns over pollution • Affordability for local young people • Quality and design of properties • Accept need for homes in principle • Opportunities for new infrastructure and support for retailers • 	Comments are addressed individually above, or in other tables.

Key issues raised by statutory consultees	HBC response
South Eastern Hampshire Clinical Commissioning Group:	
<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>
Southern Gas Networks:	
<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>
Hampshire County Council:	
<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"> • A3023, Hayling Island • Park Road Corridor including Solent Road • Campdown development • Denvilles Development • Deliverability/Financing of major infrastructure proposals 	<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.
Southern Water:	
<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.
Highways England:	
Would welcome opportunity for continued engagement.	The Council is committed to continuing engagement with partners.
Chichester District Council:	
Welcomes approach in responding to evidence on housing need.	Support noted.
Environment Agency:	
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.
Natural England:	
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.

Proposed Modifications to the Housing Statement		
Section/Paragraph	Proposed Change	Reason for Change
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.	<p>Urban areas, including the Borough's town centres, have been considered. Background evidence has been published at https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis. 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.</p> <p>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.</p>
Brownfield sites have been dismissed for cost reasons.	
More focus should be placed on the regeneration of Havant Town Centre i.e. East Street.	<p>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.</p>
Government figures, from 2015, show that Havant has almost 1000 vacant dwellings; why are these properties not being used rather than building new ones?	<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 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 SHMA²⁰).</p>

²⁰ 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: https://www.gov.uk/Government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants
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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis . 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: http://www.havant.gov.uk/planning-and-environment/planning-policy/local-plan-core-strategy/annual-monitoring-reports 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"> • High density – minimum of 60 dwellings per hectare. • Medium density – minimum of 45 dwellings per hectare. • Low density – up to 45 dwellings per hectare. <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
Highways England:	
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 Local Plan Expert Group Report 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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis . 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

Key issues raised by residents and other stakeholders	HBC response
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 www.havant.gov.uk/localplan/evidence-base .

Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
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.	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: <ul style="list-style-type: none"> • Land east of College Road (UE70) • Land north of Fort Purbrook (UE72)
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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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 www.havant.gov.uk/cycling/active-travel-study .
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.

Proposed Modifications to the Housing Statement		
Section/Paragraph	Proposed Change	Reason for Change
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"> • Land east of College Road (UE70) • Land north of Fort Purbrook (UE72)
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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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: https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis²¹ .</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.

²¹ <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
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 Havant Strategic Developments Areas; Financial Feasibility Study .
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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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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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 ²² 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

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

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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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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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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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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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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 ²³ (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 ²⁴ .

²³ 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/>

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

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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 Parking Supplementary Planning Document (SPD) 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

117 responses were received regarding this topic

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
Highways England:	
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.
Historic England:	
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
Hampshire County Council:	
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.
Chichester District Council:	
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.

Proposed Modifications to the Housing Statement		
Section/Paragraph	Proposed Change	Reason for Change
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

Key issues raised by residents and other stakeholders	HBC response
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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis . 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.
Key issues raised by statutory consultees	HBC response
Portsmouth City Council:	
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.
Hampshire County Council:	
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.
Chichester District Council:	
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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis . 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 within 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 ²⁵ .
Other sites should be developed – sites with less impact.	Urban areas, including Havant Town Centres have been considered. Background evidence has been published at https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis . 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

²⁵ Hedgerow Regulations 1997

<https://www.gov.uk/Government/publications/hedgerows-retention-and-replacement-notice-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 ²⁶ 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,

²⁶ <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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis 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
Chichester District Council:	
SHLAA contains no visual assessment.	Background evidence has been published on site constraints in a combination of the Strategic Housing Land Availability Assessment (SHLAA) , the Housing Constraints and Supply Analysis and the Landscape Capacity Study .
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.
Historic England:	
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

Section/Paragraph	Proposed Change	Reason for Change
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>

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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.

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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>

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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"> • High density – minimum of 60 dwellings per hectare. • Medium density – minimum of 45 dwellings per hectare. • Low density – up to 45 dwellings per hectare. <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.

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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 th July 2016 and the application was validated on 1 st August. The application is currently going through the standard development management process.
Key issues raised by statutory consultees	HBC response
Hampshire County Council:	
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>

Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
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

Section/Paragraph	Proposed Change	Reason for Change
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>

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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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant is the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis ²⁷ 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.

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

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126 responses were received regarding this topic

Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
Roundabout. No proposals put forward to address this impact. Lower Road is a Category D road. Kings Croft Lane is a single track road.	
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).	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.
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.	
Highways Report should be challenged. Will survey data used to support proposal be made public?	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.
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>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): http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary This policy requirement will be considered further through the Havant Borough Local Plan 2036.
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.

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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
Southern Water:	
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.
Portsmouth Water:	
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.
Environment Agency:	
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>RSPB:</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 ²⁸ 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.

²⁸ Reference APP/14/00232 permitted 5th 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
Historic England:	
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"> • High density – minimum of 60 dwellings per hectare. • Medium density – minimum of 45 dwellings per hectare. • Low density – up to 45 dwellings per hectare. <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): http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary
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
Hampshire County Council:	
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
Portsmouth Water:	
<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
Local Plan	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.
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.

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

Consultation Responses

Key issues raised by residents and other stakeholders	HBC response
<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.
Key issues raised by statutory consultees	HBC response
Historic England:	
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.
Hampshire County Council:	
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:

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.

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.

Proposed Modifications to the Housing Statement

Section/Paragraph	Proposed Change	Reason for Change
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 Study²⁹ 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

²⁹ <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: https://www.gov.uk/Government/consultations/new-part-r-of-the-building-regulations
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>	

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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 Planning³⁰.</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>

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

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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): http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary This policy requirement will be considered through the Havant Borough Local Plan 2036.
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

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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: http://www3.hants.gov.uk/mineralsandwaste/infrastructure.htm
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

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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	

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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.

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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.

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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	

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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

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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>

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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>Flooding</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.

Hayling Island development in general

265 responses were received regarding this topic

Consultation Responses

<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>

Hayling Island development in general

265 responses were received regarding this topic

Consultation Responses

	<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 Housing Constraints and Supply Analysis 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>http://www.havant.gov.uk/planning-and-environment/planning-policy/supplementary-planning-documents/parking-supplementary</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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis . 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 affordable homes (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: http://www.havant.gov.uk/localplan/regulatory-requirements
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: https://www.havant.gov.uk/sites/default/files/documents/Housing%20Constraints%20and%20Supply%20Analysis%20-%20FINAL.pdf
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.
Key issues raised by statutory consultees	HBC response
Environment Agency:	
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>

Proposed Modifications to the Housing Statement		
Section/Paragraph	Proposed Change	Reason for Change
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

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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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply

Rook Farm General

36 responses were received regarding this topic

Consultation Responses

	<p>Analysis. 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

Section/Paragraph	Proposed Change	Reason for Change
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

Key issues raised by residents and other stakeholders	HBC response
<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

Key issues raised by residents and other stakeholders	HBC response
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>

Proposed Modifications to the Housing Statement		
Section/Paragraph	Proposed Change	Reason for Change
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

Key issues raised by residents and other stakeholders	HBC response
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

Key issues raised by residents and other stakeholders	HBC response
<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 & 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

Key issues raised by residents and other stakeholders	HBC response
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

Section/Paragraph	Proposed Change	Reason for Change
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

Key issues raised by residents and other stakeholders	HBC response
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.	<p>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.</p> <p>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.</p>
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

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, 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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis . 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: https://www.gov.uk/Government/consultations/new-part-r-of-the-building-regulations
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 Land North of the A27 (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>Hazleton Woods 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 land to the south west of Emsworth on the Havant Road 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

Key issues raised by residents and other stakeholders	HBC response
<p>other south coast destinations and London.</p> <p>Land West of Emsworth (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> <p>- in Emsworth, the horse's field opposite existing housing would be preferable, as it does not close the Havant/Emsworth Gap</p>	<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 Southmere Field, Langstone Road (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 Southmere Field, Langstone Road (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>154 London Road, Waterloooville (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 Grassmere Way and Tempest Avenue (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>Gas site at Downley Road 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

Key issues raised by residents and other stakeholders	HBC response
limitations on surrounding development opportunities.	
Emsworth Holder Station, 69 North Street , 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.
L145 SSE Site, Bartons Road 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 - Dunsbury Hill Farm	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 Littlepark House 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

Key issues raised by residents and other stakeholders	HBC response
<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), Littlepark Wood (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 Funland Amusement Park, which forms part of the allocation HY45 Beachlands 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>Leigh Park 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>Helmsley House, Bartons Road, 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 land East of Westbourne Avenue, Emsworth (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.
Northney Marina (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 ³¹ 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

³¹ 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

Key issues raised by residents and other stakeholders	HBC response
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"> 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. 	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.
Land near Hulbert Road 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.
New Lane. 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 Langstone Technology Park 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

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

Proposed Modifications to the Housing Statement		
Section/Paragraph	Proposed Change	Reason for Change
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
Portsmouth Water PLC:	
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
Hampshire County Council:	
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 & 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
Portsmouth Water PLC:	
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"> • HO6, Warblington School Field (off New Lane), SPZ1c • UE3a, Land north of Bartons Road, SPZ1c • UE3b, Land south of Bartons Road, SPZ1c 	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 https://www.havant.gov.uk/planning-and-environment/planning-policy/self-build-and-custom-housebuilding . 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

Key issues raised by residents and other stakeholders	HBC response
<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

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.

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 Public Consultations, 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: http://www.havant.gov.uk/localplan</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 1st 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 https://www.havant.gov.uk/localplan/evidence-base . Particularly relevant are the Strategic Housing Land Availability Assessment (SHLAA) and the Housing Constraints and Supply Analysis. These will form part of the evidence to demonstrate the soundness of the plan at examination.</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 25th 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 th July 2016 and can be found at: http://www.havant.gov.uk/localplan/evidence-base The Sustainability Appraisal can be found at: http://www.havant.gov.uk/localplan/regulatory-requirements
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 affordable homes (Social rented, affordable rented and intermediate housing) in developments.

Other comments

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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.	<p>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.</p> <p>This is highlighted in the National Planning Policy Framework (NPPF) (2012) and the Government's 'Planning Policy for Traveller Sites' document (August 2015).</p> <p>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.</p>

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 Borough Design Guide Supplementary Planning Document. 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: http://www.havant.gov.uk/planning-and-environment/planning-services/view-planning-applications-and-planning-decisions/development-consultation-forums. 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: https://planningpublicaccess.havant.gov.uk/online-applications/</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.

