



HAVANT CORE STRATEGY EXAMINATION

General Session

7th September 2010

Submitted on behalf of
Markfield Investments Ltd

August 2010

10.127

Crowthorne House, Nine Mile Ride,
Wokingham, Berkshire RG40 3GZ

T 01344 753 220
F 01344 753 221

enquiries@boyerplanning.co.uk
www.boyerplanning.co.uk

CONTENTS

Page No.

SECTION ONE – INTRODUCTION **1**

SECTION TWO – MATTERS TO BE EXAMINED **2**



SECTION ONE – INTRODUCTION

- 1.1** These representations have been prepared by Boyer Planning Limited on behalf of our clients, Markfield Investments Limited, in relation to the General Session of the Havant Core Strategy Examination, to be held on 7th September 2010.
- 1.2** We have submitted representations to the Council throughout the Core Strategy process and most recently in respect of the Submission Document. Our representations to the Core Strategy are directly relevant to the list of matters to be examined, and this statement specifically addresses the questions that have been raised that are relevant in the context of our representations.
- 1.3** The Tests of Soundness to be applied to this Core Strategy are those contained within revised PPS12.
- 1.4** On behalf of our client we are also submitting representations in respect of the Housing and Conservation, Landscape & Countryside Sessions.
- 1.5** In respect of the Tests of Soundness we consider that, overall, the Core Strategy is sound, but recommend that some amendments are made to improve its soundness. We expand upon these points in our response to the various questions which have been raised by the Inspector.
- 1.6** We set out our response to the questions in Section Two. Our comments have regard to national planning guidance and other material considerations.



SECTION TWO – MATTERS TO BE EXAMINED

2.1 Does the Core Strategy present a clear spatial vision for the Borough, recognising its distinct qualities.

2.1.1 The Introductory chapter of the Core Strategy outlines the distinctive qualities of different parts of the Borough whilst individual policies reinforce the spatial vision. For example Policy CS15 sets out the broad locations for development in the Borough concentrating development on the five urban areas, prioritising development on previously developed land and creating the clear distinction between concentrating development in urban areas and controlling development in the non-urban areas. Under Policy CS9 the Council allocates the amount of housing to each of the settlements in accordance with potential supply and the relative size of the main urban areas. Policy CS14 provides more detailed policy considerations in terms of the quality of design which amongst other matters requires consideration of the character of the locality.

2.1.2 Whilst it is considered that in broad terms the Core Strategy provides a clear spatial vision for the Borough and recognises its distinct qualities, we have concerns that the policies place an unwarranted emphasis on previously developed land which is not in accordance with national policy. Furthermore there is inconsistency between Policies CS9 and CS15 in this respect. We elaborate further below.

2.2 Is the Core Strategy broadly compliant with national policy? Will the Core Strategy deliver sustainable development.

2.2.1 It is considered that the Core Strategy is broadly compliant with national policy and in general it will deliver sustainable development, in that new development is to be located at the five major settlements in the Borough. However, we are concerned with respect to the balance that needs to be struck between building on previously developed land and on greenfield sites.

2.2.2 The current wording of Policy CS15 in our view wrongly provides a sequential approach to development and we recommend amendments to this wording. Whilst we support concentrating new development at the five urban areas, we do not



support its implication that development should be within the existing urban areas (Clause 1). This leads on to our concern that this policy prioritises development on previously developed land within the urban area (Clause 2). However to a degree these points appear to be contradicted by Clause 3 which broadly distributes the new housing and employment development in the five urban areas of the Borough as indicated on the Spatial Distribution Map (Key Diagram). That Diagram identifies the urban areas with colour coding, which includes, in our view helpfully, those areas of greenfield land adjoining the built-up area that are considered to relate to the individual settlements. We support the retention of this element of the Key Diagram.

2.2.3 We also note that in relation to this issue, Policy CS9: Housing, in clause 8, has what we regard to be more appropriate wording in this respect. It states:-

“Ensure housing development is delivered in a phased manner with an appropriate proportion of previously developed land so as to avoid unnecessary development on greenfield urban extension sites.”

This attempts to strike a balance between the use of previously developed land and greenfield urban extension sites, which aligns more, in our view, with the options for accommodating new housing growth set out in the fifth bullet point of para. 38 of PPS3: Housing. We address Policy CS9 further in our statement for the Housing Session.

2.2.4 Our understanding of the matter is that PPS3 has been misapplied in Policy CS15. In our view, the Council has sought to enable a prioritisation to take place which puts land within settlement boundaries first and thus likely to provide a high percentage of PDL sites. By using this method, the Council presumably considers that it would have greater control in ensuring that the 60% PDL target set by PPS3 is met.

2.2.5 However, we consider that the above strategy is far too rigid and incorrectly results in a similar approach to PPG3, in which a prioritisation of brownfield land took place. Clearly, this approach can stifle development, hence its removal, when PPS3 was published. Whilst a 60% national PDL target is included in PPS3, it does not



state that the development of previously developed sites should take place prior to other sources of supply. Rather, a range of sources of supply are identified within PPS3, with the intention that these all carry equal weight in respect of their release for delivery (PPS3, para. 38, fifth bullet). In order to manage the release of sites, priority should not be in respect of land type but rather by virtue of their allocation and ability to deliver.

2.2.6 The Council acknowledges that if the 6,300 dwellings that need to be provided within the Plan period are built, then it is likely that only 51% of the development will in fact be on PDL. However, their proposed phasing strategy, which will seek development first on PDL before greenfield sites may not result in the provision of sustainable development, as some greenfield locations may be in more sustainable locations compared to some of the urban sites. Therefore there should be more flexibility to allow for sustainable greenfield sites coming forward ahead of its sustainability urban sites.

2.2.7 In the light of the above we recommend the following changes to policy :-

Policy CS15, clause 1 :-

Concentrates new housing, employment, retail, leisure and other development within, or on appropriate land adjacent to, the five urban areas of Havant, Leigh Park, Waterlooville, Emsworth and Hayling Island, as shown on the ~~Havant Borough Urban Areas Map and Non-Urban Areas Map~~, Spatial Distribution Map (Key Diagram).

Policy CS15, clause 2 :-

~~Prioritises development on previously developed land, including redundant, derelict or under-used land and buildings within the urban area. In accordance with Clause 1, previously developed land, including redundant, derelict or under-used land and buildings within the urban area, will be allocated and released for development, together with selected greenfield sites within and/or adjacent to the urban area boundary which will also be~~



allocated and released as appropriate to maintain a sufficient phased supply of deliverable and developable land.

Policy CS15, clause 3 : -

Broadly distributes the new housing and employment development ~~in~~ to the five urban areas of the Borough as indicated on the Spatial Distribution Map (Key Diagram).

2.2.8 We consider that the final sentence of Policy CS15 should therefore be deleted.

2.3 Does the Core Strategy address issues of climate change satisfactorily.

2.3.1 Policy CS12 deals with the issue of efficient use of resources and measures concerning climate change and it is considered that this policy provides the appropriate overarching policy basis to deal with matters associated with climate change. More detail may be required through the use of DPDs and SPDs.

2.4 Will the Core Strategy provide effectively for inclusive communities?

2.4.1 Subject to the proposed changes above it is considered that Policies CS9, CS15 and CS14 provide sufficient safeguards to provide for inclusive communities, as these policies help to distribute housing to the more sustainable urban settlements and provide the criteria to ensure that individual development schemes are inclusive to all.

***Boyer Planning Ltd
August 2010***

