



HAVANT BOROUGH

CORE STRATEGY

EXAMINATION IN PUBLIC

EXAMINATION STATEMENT

Grainger plc

Submitted 16 August 2010

SESSION 1: GENERAL

GRAINGER PLC REF: 06/0642(B)

Woodcroft Farm



Introduction

This Examination Statement has been submitted on behalf of Grainger plc as part of the Examination in Public on the Havant Borough Local Development Framework Core Strategy (HBCS). The Statement highlights and where necessary expands upon the sustainability representation submitted by Grainger in May 2010 on the Core Strategy process. It does not repeat representations.

Referencing

The referencing system used to reference these representations is derived from stating the policy, paragraph, appendix or diagram number that representations were submitted, followed by our generic reference number given by the Council – 0642(B).

Abbreviations

- HBC – Havant Borough Council
- SV – Savills (Planning Consultant)
- PPS – Planning Policy Statement
- HBCS – Havant Borough Submission Core Strategy
- SEP – South East Plan

Spatial Vision

Q1. Does the CS present a clear spatial vision for the borough, recognising its distinct qualities?

- 1.1 Yes, with the exception of the following.

Consistent with Partnership for Urban South Hampshire Policy (PUSH)

- 1.2 Since the Submission Core Strategy was prepared, the economic growth projections prepared by PUSH have been revised through its updated economic development evidence base.
- 1.3 Reference to achieving a Gross Value Added of 3.5% per annum within the submitted Core Strategy will need to be updated to incorporate the recent PUSH findings and revised growth scenario. PUSH's most recent Economic Development Strategy (EDS) (June 2010) Section 2.3 states that average annual GVA growth over the period 2006-26 will be around 2% rather than the previous aspiration of growth in excess of 3%.

How the Core Strategy can be made sound. Including the precise changes & wording that is sought

- 1.4 PUSH are currently consulting on the revised Preferred Growth Scenario, and the final Strategy will not be in place until after the EIP. As the revised GVA per annum is likely to be around 2%, it is suggested that Havant Borough amend the Core Strategy to state:

“Achieve Gross Value Added (GVA) growth rate as identified by the revised PUSH Business Plan”

- 1.5 Such a change would be flexible enough to take into account the findings of the PUSH consultation exercise currently taking place, and would remain consistent with any future updates undertaken by PUSH.

Sustainable Development

Q2: Is the Core Strategy (CS) broadly compliant with national policy? Will the CS deliver sustainable development.

- 2.1 Yes. While there have been changes to PPS3 since the document has been drafted, not least the removal of a minimum density threshold and garden land from PDL category, these can be addressed through amendments to the wording of the CS, and should not affect the Spatial Strategy set out within the document. In the absence of an alternative, Havant

Borough has taken the decision to continue with the strategy set out within the South East Plan in respect of housing requirement, which is consistent with the advice given by the Chief Planning Officer in his letter dated 6th July 2010.

Q3: Does the CS address cross boundary issues, including transportation, effectively?

- 3.1 In respect of Woodcroft Farm, it is acknowledged within the Core Strategy that there is potential for the Strategic Allocation to expand into both East Hampshire District and Winchester District in the future. We would contend that this issue has been addressed, with the potential for this to occur cited within all three emerging Core Strategies. Further details are provided within the Hearing Statement concerning the Strategic Sites. It should be stressed however, that the delivery of the Woodcroft Farm Strategic Development within Havant Borough is not dependant on land within East Hampshire District or Winchester District coming forward. Furthermore, it is for the consideration of both East Hampshire District and Winchester City Council, whether to pursue such a strategy within their respective Core Strategies.

Q4: Does the Core Strategy deal with the issue if Climate Change satisfactorily?

- 4.1 The following text regarding Climate Change and Policy CS12 draws on Savills' representation concerning Woodcroft Farm reference **CS12/06/6042(B)** providing updated text where relevant.
- 4.2 The Core Strategy policy CS12 (Efficient Use of Resources) requires sustainability measures above that of national policy through the Building Regulations which is contrary to the present PPS1 Supplement and the emerging PPS on Climate Change.
- 4.3 This is because the Core Strategy requires 'full' Code for Sustainable Homes (CfSH) adherence, with a stepped increase in the requirement to the peak of 2016, whereas the PPS1 Supplement clearly states that LDDs should not repeat the Building Regulations, and where specific local requirements are proposed via the LDF (i.e. different to the Building Regulations) that these should be fully justified by evidence.
- 4.4 The Building Regulations Approved Documents Part L1 already requires a stepped change in carbon reductions. The Regulations currently require reductions of 25%, requiring reductions in 2013 of 44% and a requirement to be carbon neutral in 2016 with parallel (though not identical) reductions planned for non domestic buildings through Building Regulations

Approved Documents Part L2 (forthcoming Code for Sustainable Buildings). Also that water reduction requirements, set by Part G2 2010 now require a maximum domestic water usage of 125l/person per day, a reduction of 25l against the national average. Any requirement for new developments to exceed these requirements would need to be evidenced in particular, to have policies developed to identify how existing properties both domestic and non-domestic would need to be addressed.

- 4.5 Owing to the revocation of the South East Plan Grainger also has concerns about the 10% on-site renewable requirement, as there is no longer the conformity justification for this inclusion. Grainger is unsure whether Havant Borough has produced local evidence to continue with the 10% requirement.
- 4.6 Furthermore, it should be noted that CfSH Levels 3 and 4 can be achieved via energy efficiency measures alone, neglecting the need for renewables. Owing to this a blanket renewables requirement may actually impede development and the delivery of more sustainable homes/ buildings.
- 4.7 The policy should also enable Allowable Solutions which should be incorporated into Policy CS12. The reason for this is that it will clearly signal to readers of the policy that Havant Borough's prime aim is to become carbon neutral rather than have renewable electrical power generation alone and will encourage consideration of a wider range of solutions. Such solutions could include renewable heat, other renewable electrical power sources as well as measures that will be identified in forthcoming UK building regulations and known as "allowable solutions" for carbon neutrality. The Allowable Solutions are currently under review by Government but may include off-site energy solutions as well as contributions into local authority funds for improving the CO2 emissions of the existing communities and building stock amongst others.
- 4.8 Overall, the core issue for determination is whether the Borough Council has produced robust locally orientated evidence to justify the proposed imposition of 'full code' requirements, and hence the proposed deviation away from the national standards being imposed through the Building Regulations.
- 4.9 Without such evidence the Inspector should amend the policy to ensure that it is in accordance with the national timetable, and furthermore that it reflects only the changes to the Building Regulations.

4.10 Further reasoning is outlined in **representation CS12/0642(A and B)**.

How the Core Strategy can be made sound. Including the precise changes & wording that is sought

4.11 It is suggested that the Core Strategy outline the National CfSH Homes water and energy requirements from 2010, 2013 and 2016. It is also suggested that the requirement for 10% on-site renewable is removed as being too restrictive on development in seeking carbon reduction measures.

4.12 The inclusion of additional text on the ability for Allowable Solutions as part of the HBSCS, as a separate point within policy CS12 will also contribute towards ensuring the policy is effective. Text could state:

“The incorporation of “allowable solutions” to achieve carbon neutrality for the Borough will be sought”

Social Cohesion

Q5. Will the CS provide effectively for inclusive communities?

5.1 Savills has no comments to make in relation to this question

Q6. Will the needs of Gypsies, travellers and travelling show people be met satisfactorily, in accordance with government guidance?

6.1 Savills has no comments to make in relation to this question

END OF STATEMENT