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Ms Lynette Duncan
Programme Officer,
Havant Borough Council
Civic Offices
Havant
PO9 2AX

Date: 16th August 2010

Re: Further written submission to Havant Borough Core Strategy Examination

Dear Ms Duncan,

Please find attached 2 further submissions to my previous submission made in May 2010 on the pre-submission Core Strategy. These submissions take into account changes in government policy related to local regional plans that were not evident during the previous consultation phase.

There are 4 copies of the additional submissions. I have also submitted these via the policy.design@havant.gov.uk and lynsetteduncan@personaassociates.co.uk e-mail addresses

If you have any questions please contact me.

Yours Sincerely

Andrew Caple

SUBMISSION A1 – Target for New Dwelling Developments

Question	Submission
Which part of the Core Strategy is unsound.	p.64, CS9
Which soundness test set out in para 4.52 of PPS12 does it fail?	Policy is not consistent with National Policy.
Why does it fail	Policy does not take due consideration for PPS3, para 6.12.
How can the Core Strategy be made sound	The pre-submission Core Strategy identifies 6300 new homes as needed to 'meet the requirements of the South East Plan.' This target is no longer mandatory as the regional planning framework under which this target was imposed has been abolished. The target should therefore be re-justified versus legislation still remaining in force to ensure this it still complies with National Policy. <i>Para 6.12, PPS3</i> states that 'The national annual target is that at least 60 per cent of new housing should be provided on previously developed land.' A current assessment of proposed PDL and Greenfield sites for Havant (SHLAA Jan 2010) indicates that only 42% PDL may be available if 6300 houses are to approved. This implies that the housing target is too high to met the 60% PDL guidance as stated in <i>PPS3</i> . The housing target should therefore be reviewed in line with available sites to determine if it is valid.
What is the precise change/wording that is being sought.	An appropriate wording for consideration would be: 'The appropriate level of new dwellings between 2006 and 2026 should be determined by assessing available site allocations to ensure that 60% of new housing can be provided on previously developed land'.

SUBMISSION A2 – Phasing of Housing Development re: AONB

Question	Submission
Which part of the Core Strategy is unsound.	p.64, CS9
Which soundness test set out in para 4.52 of PPS12 does it fail?	Policy is not consistent with National Policy.
Why does it fail	Policy does not take due consideration for PPS7, para 22.
How can the Core Strategy be made sound	Policy DM9 of the Pre-Submission Core Strategy explicitly states that 'within Chichester Harbour AONB major development will only be permitted where there is an overriding national interest and a lack of alternative sites' , supporting <i>PPS7, para 22</i> . (Major Development is defined as any development greater than 10 dwellings). If a national interest need is proven then planning approval within the AONB would still need to meet the 'lack of alternative sites' requirement. As it would not be clear if additional sites for housing development will be identified before 2026, then is would be inappropriate to bring forward sites for approval within the AONB earlier (i.e. de-prioritised from 5 and 10 year plans) until it was certain that the planning target could not be met by 2026. (As the capacity of the sites currently identified exceed the current 6300 new dwellings total then it is not currently proven that building with the AONB is required). This should be taken into account in the housing development phasing guidance.
What is the precise change/wording that is being sought.	An appropriate wording for consideration would be: 'Housing developments within the AONB should not be considered for early planning approval until it is proven both in the national interest and essential to meet the agreed housing target required by 2026'.