



HAVANT BOROUGH
CORE STRATEGY
EXAMINATION IN PUBLIC

SUBMISSION

EXAMINATION STATEMENT
SCOTTISH & SOUTHERN ENERGY
Submitted: 16 August 2010

All Issues / Matters

EXAMINATION STATEMENT 1
SSE REF: 08/0397



Issue 1 – South East Plan, Spatial Strategy & Sustainable Development

17 March 2009

Introduction

This Examination Statement has been submitted by Scottish & Southern Energy (SSE) 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 representations submitted by SSE in May 2010 on the Core Strategy process. It does not repeat representations.

In drafting this Statement SSE wishes to reiterate that these comments only apply to the company as a landowner in the Borough, and not as an electricity generator/distributor/supplier.

The following NWC representations were submitted by SSE and this Statement is applicable to the following Examination issues raised:

REF	Page	Para/ Policy		SSE Obj / Supp	Relevant Inspector Matter
CS2/0397	41	CS2	Employment	Obj	Issue No 7 & 8
CS9/0397	64	CS9	Housing	Obj	Issue No 9 to 13
CS12/0397	78-79	CS21	Efficient Use of Resources	Obj	Issue No 4
CS19/0397	117	CS19	Developer Contributions	Obj	Issue No 26 & 27
DM3/0397	-	DM3	Employment Allocations	Obj	Issue No 25

The Statement should be read as a further written representation. SSE does not wish to appear at the Examination.

Referencing

SSE has referred to the representations submitted on the Submission Core Strategy throughout the Examination Statement. The referencing system used to refer to these representations is derived from stating the policy, paragraph, appendix or diagram number that representations were submitted on, followed by our generic reference number given by the Council - 0397. For example CS2/0397 would refer to the Submission Core Strategy SSE representations on policy CS2 (Employment).



Abbreviations

- HBC – Havant Borough Council
- SSE – Scottish & Southern Energy
- SV – Savills (Planning Consultant)
- PPS – Planning Policy Statement
- HBCS – Havant Borough Submission Core Strategy



Sustainable Development

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

Respondent representation CS12/0397

1. The present approach is not satisfactory.
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.
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. 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.
5. Owing to the revocation of the South East Plan SSE also has concerns about the 10% on-site renewable requirement, as there is no longer the conformity justification for this inclusion. SSE is unsure whether Havant Borough has produced local evidence to continue with the 10% requirement.
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.

7. 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.
8. 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.
9. Further reasoning is outlined in **representation CS12/0642**.

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

10. It is suggested that the Core Strategy outlines 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.

Employment

Q7. Will the CS provide adequate employment opportunities of the right type?

11. No, the CS needs to reflect the evidence base more adequately. It is important that full consideration is had of a) Havant's spatial characteristics and location within the South Hampshire economy, b) that the findings and outcomes of the DTZ Employment Land Review (ELR) (February 2010) are adequately reflected in the Core Strategy, and c) that the implications of the recent recession/ revocation of the South East Plan are recognised.
12. In terms of a) the Core Strategy must recognise the sub-regional character of the employment focus being based on the two cities (Portsmouth and Southampton) and M27 corridor, and whilst Havant should be providing employment opportunities the need for major office premises is reduced. In terms of b) the policies should recognise the high level of employment supply or potential supply in the Borough as demonstrated by the DTZ ELR. In terms of c) it is notable that the revocation of the South East Plan



removed the Sub-Regional employment policy SH3 (and hence employment floorspace requirement). This was based on evidence produced during the preparation of the RSS that sought to achieve 3.5% Gross Value Added (GVA) over the plan period. Clearly the recession has caused a delay in this target being achieved, which is having implications for the supply of available sites and more importantly the demand for employment. An amendment to the Core Strategy could propose a more flexible approach to the requirement in light of the removal of regional planning and prevailing economic circumstances.

13. Reference to achieving a Gross Value Added of 3.5% per annum by 2026 will need to be updated to incorporate the recent PUSH findings and revised growth scenario. PUSH's 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 PUSH aspiration of growth in excess of 3%. Unfortunately the revised 2010-12 PUSH Business Plan does not currently incorporate these changes at present, however, reference is made to new measures relating to annual GVA as a result of the revised EDS.
14. Overall, SSE believes that the Council has more than an adequate level of supply of employment sites as demonstrated by the DTZ ELR, and notably that there is a significant surplus of office sites. As such the CS should be amended to reflect the points outlined in paragraphs 12 and 13 above.
15. Greater certainty is also required as to the distribution of employment floorspace at key sites (Dunsbury Hill Farm and Havant Thicket Reservoir) as presently the plan is not clear on these points.
16. Full reasoning is outlined in representations CS2/0397 and DM3/0397.

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

17. The CS should reflect the lower PUSH GVA growth scenario of 2%. Greater flexibility should be added to the CS on employment.
18. Revised policy wording is provided by representation CS2/0397.



Q8. Is the policy for the protection of existing employment sites appropriate? Have the right sites been identified for protection?

19. Greater flexibility is required within policies CS2 and DM3 to ensure that the correct employment opportunities are maximised and that other competing spatial demands are met, for example the delivery of viable development on previously developed land. This will then ensure that the Core Strategy complies with PPS4.
20. Full reasoning, including a suggested policy rewording for policies CS2 and DM3 is outlined in representations CS2/0397 and DM3/0397.

Housing

Q9. Will the right amount of housing be provided at appropriate sustainable locations?

21. Yes. The spatial focus is clearly on the existing settlements of Havant and Waterlooville. SSE supports the decision of the Council to adopt and continue to endorse the previous South East Plan housing target which will have economic and regeneration benefits for the town.

Q10. Is the Housing Trajectory realistic; can it be delivered? Will the CS provide a five and ten year supply of housing?

22. There is no evidence to suggest that the housing trajectory cannot be delivered. In order to ensure delivery, a positive and flexible approach to the release of suitable previously developed sites should be had.

Q11. Is the target of 60% of housing on previously developed land (PDL) appropriate, can it be met?

23. A mixture of Greenfield and PDL sites will provide the optimum plan flexibility, a requirement to encourage PDL sites for regeneration purposes would meet various sustainable development criteria. Furthermore the PDL requirement enables sites which may be alternative uses to come forward for residential where justified. This will have the benefit of aiding the overall flexible supply of housing supply as required by PPS3.
24. A PDL 'target' may no longer be necessary or realistic owing the amendment of PPS3 (June 2010) which removed gardens as being PDL.



Q12. Is the discount rate realistic?

25. SSE has concerns with Policy CS9 as it makes no discount rate/ contingency allowance. This may be an issue of CS plan effectiveness as SSE notes table 6.0 which does outline potential supply (2006-2026) of 6,974 units (in excess of the 6,300 plan target)
26. It is accepted that the regional housing requirement no longer exists, however, it is clear that the Borough Council has accepted the level of housing proposed at 6,300 dwellings over the plan period. In this case, the Council needs to provide a clear contingency allowance to account for a proportion of sites not coming forward over the plan period. This will provide the required flexibility (and ongoing housing supply) as outlined by PPS3.
27. SSE has suggested that a rate of 10% be applied, which would allow for further sites to be proposed via a subsequent DPD for some 630 dwellings.
28. SSE trusts that the Barton's Road site will be included for consideration through a future DPD process.
29. Full reasons are outlined in representation CS9/0397.

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

30. SSE suggests that policy CS9 be amended to make it clearer that the subsequent Allocations DPD will need to factor a 10% discount rate, so as to ensure a flexible supply of sites. They would be effective and ensure that the policy more adequately reflects Table 6.0.

Q13. Is there sufficient flexibility in the proposals to deal with contingencies?

31. See answer to Q12.



Development Management Policies

Q25. Are the Development Management policies appropriate? Are they consistent with Government guidance?

32. Please note the comments made under Questions 7 and 8 including suggested policy rewording for policy DM3 as outlined in representation DM3/0397.

Other Matters

Q26. Has the CS adequately addressed the Borough's Infrastructure needs, and how these will be funded and delivered, in a co-ordinated manner?

33. The only comment SSE would make is with regard to whether the CS needs to include further clarity on CIL (and future proposals for such – if any) and also ensure that appropriate references are made to CIL Regulation 122 – with implications.
34. Further reasoning is outlined in representation CS19/0397.

END OF STATEMENT