



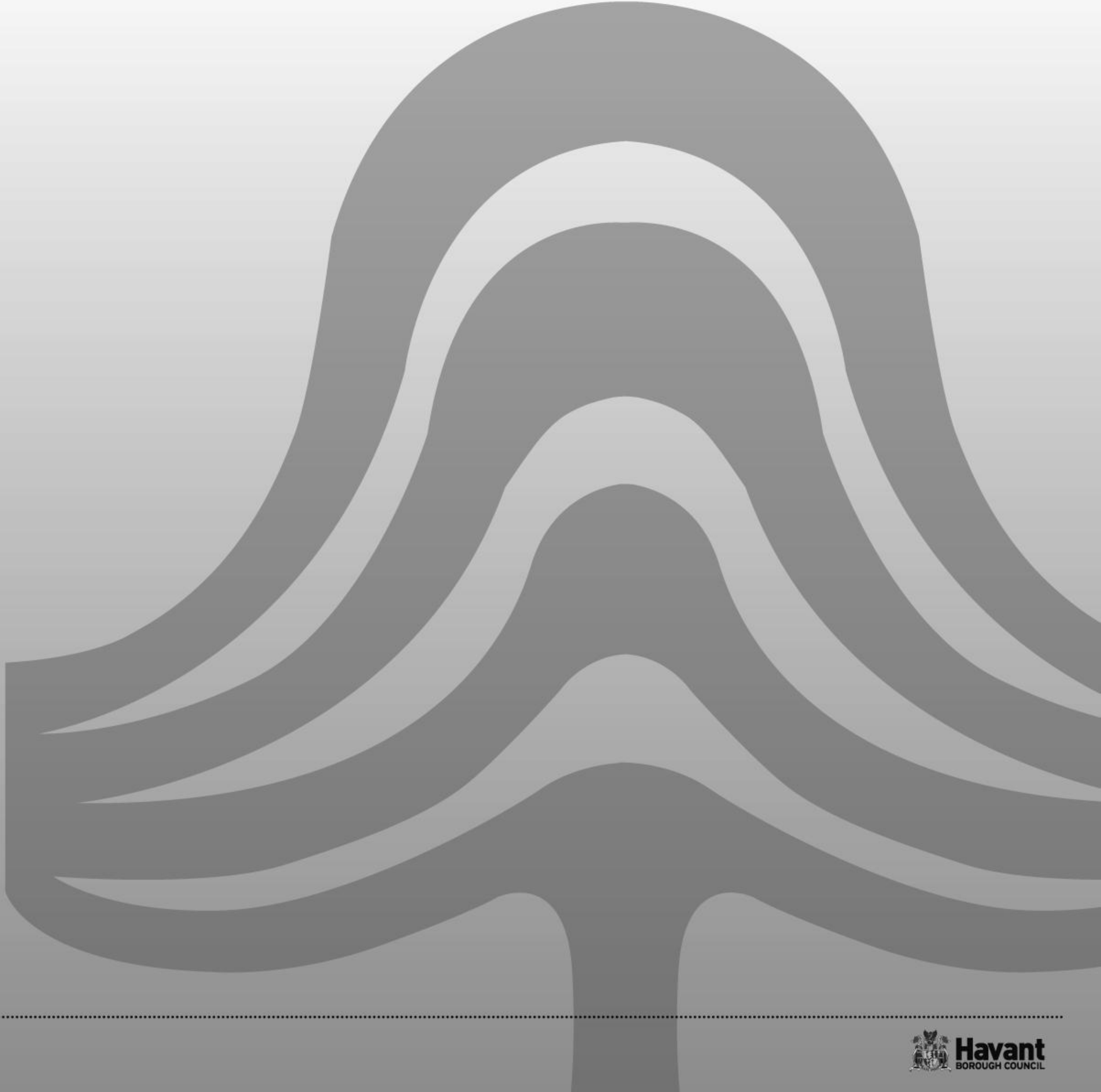
LOCAL DEVELOPMENT SCHEME ■
ISSUES AND OPTIONS ■
PREFERRED OPTIONS □
SUBMISSION □
ADOPTION □

HAVANT **LOCAL** DEVELOPMENT **FRAMEWORK**

Core Strategy Issues and Options

July 2006

Analysis of Responses



Havant Core Strategy – Consultation on Issues and Options - Analysis

1.0 Background

- 1.1 The Consultation on the Issues and Options took place between 21st July and 31st August 2006. A total of 123 respondents made comments. Of these, 66 were from organisations, 38 from individuals and 19 were made anonymously. Of the 123, 101 of the responses were by questionnaire. Of the 123 responses a total of 112 (91%) were made electronically either through the website or by email.
- 1.2 The Issues and Options document sets out the various issues and options surrounding a particular topic or spatial direction. It was always the intention that all viable options should be explored at this initial stage. The questions in the questionnaire all relate to the explanatory text in the Issues and Options document itself. The questions are framed to provide a statement relating to a particular policy topic or spatial direction to which the respondent has a gradation of choices between strongly agreeing and strongly disagreeing. The agreement choices indicate that the option put forward in the questionnaire statement is supported whilst the disagreement choices clearly indicate that an opposing alternative is sought.
- 1.3 Whilst the questions themselves included implied alternative options, the accompanying document provides the pointers to the alternatives. The opportunity to disagree and write in the free text box or a separate letter enables respondents to set out their own opinion on all the options on any topic or spatial direction.
- 1.4 The Issues and Options were grouped by key issues and the analysis of the responses follows the same format. The questions are reproduced in the same format that they appeared in the questionnaire together with the percentage of respondents who chose the various options. The percentage scores are of the total number of respondents filling in a questionnaire. Some respondents completed only a few questions therefore the percentages don't add to 100. For this analysis levels of 10% agreement or disagreement are considered significant. The most popular response(s), i.e. those representing over 50%, are highlighted in the tables with shading.
- 1.5 The Issues and Options document has a number of sections before the Key issues and a number of responses were made to these. These are analysed before the Key issues.

2.0 Section 1 - Introduction

- 2.1 The format of the document appears to have been an issue in that the two representees found it difficult to comment on the lack of detail and felt that there ought to be full public consultation on issues and options.
- 2.2 The different format of the LDF with the informal pre-submission Regulation 25 stage will take getting used to. As there is no real best practice to follow on how to do a Development Plan Document most Councils are trying different approaches. Although not a requirement the significant publicity given to the consultation and the availability of the documents freely over the internet effectively enabled any member of the public to get involved.

3.0 Section 2 - How the Document Is Set Out

- 3.1 Style issues regarding paragraph numbering, repetition of Government advice, generalized nature of document and lack of detail were raised. More importantly questions were raised regarding the limited options being made apparent, the prescriptive nature of the questionnaire possibly leading to biased results and the lack of free text boxes to raise additional options.
- 3.2 Paragraph numbering will be added when the document becomes more formalised, whilst the Government guidance was included at this stage to provide the context. The Government guidance will not be repeated in the submission document. The Core Strategy is a strategic level document and will inevitably lack the sorts of detail respondents are used to in old style plans. The single free text box provided an opportunity to make any comments, whilst there is no reason, why additional comments wouldn't be accepted as was the case with the number of non-questionnaire responses received.
- 3.3 The apparent lack of viable options and leading style of the questionnaire are potentially serious issues bearing in mind the recent failures of the Lichfield and Stafford Core Strategies. Further advice sought.

4.0 Section 3 - Rules

- 4.1 SEERA confirmed that the Core Strategy should be in general conformity with RPG9 and take account of the South East Plan. There is concern that the PUSH growth commitment is not sustainable without sufficient infrastructure.
- 4.2 The need to be in general conformity/take into account regional guidance will be acknowledged in the preferred options. As with Government advice/policy it must not be repeated at the submission stage. The concerns about the PUSH commitments to growth being unsustainable will be directly addressed at the South East Plan Examination in Public (EiP), which will examine the strategic sub regional position.

5.0 Section 4 - Spatial Vision for Havant

- 5.1 An alternative interpretation of the sustainable development suggests that rather than "balancing" economy, social and environmental needs it should be about "reconciling and /or integrating" them. Look for "win, win, win". The vision appears to lack environmental direction. The vision needs to recognize that Havant's natural environment provides a competitive asset that needs protection and nurturing. The PUSH vision is not sustainable and the GVA target should be lower or a different target used such as wealth per head.
- 5.2 The issue of the use of GVA targets will be debated and determined through the South East Plan EiP.
- 5.3 The reconciling/integrating of economic, environmental and social issues has much to commend it is a positive interpretation of sustainable development. The approach should be developed in further iterations of the Core Strategy, along the lines of economic regeneration of the borough that has added value from the enhancement of the environment leading to social improvements. Neither of the three sustainability themes are disadvantaged.
- 5.4 The vision for Havant set out in the original document remains valid (**"The vision for the Core Strategy is simply to make Havant a better place – safer, more**

attractive, more prosperous, with fewer inequalities and with a clear sense of community”). It is a general statement to which all the policies of the core strategy will feed from.

6.0 Section 5 - Key Issues for the Core Strategy

- 6.1 Points of detail arose in relation to the broad summaries of the key issues, such as lack of reference to flooding in changing coastline, that Emsworth is not an unattractive shopping location and that areas of the highest deprivation need better community safety and accessibility. An interesting point is raised regarding the timing/phasing of development. Only housing development has definite timed targets, whereas all the accompanying spatial development is not adequately joined up.
- 6.2 The summaries of the Key issue can't cover all the details that are covered later in the document, e.g. flooding is covered in the actual section on Changing Coastline. The issue of timing is a valid concern and the PUSH growth premise is based on recognition that there is the need for the accompanying infrastructure to be in place for the housing development. There will therefore be a need for a phasing policy to be central to the core strategy submission.

7.0 Section 6 - Sustainability Appraisal

- 7.1 The Environment Agency (EA) have questioned the approach used and if we have presented real options. Because of this, they state that the SA is redundant, as it is not possible to test alternatives against criteria. EA have pointed out that SFRA is essential for the Core Strategy, following the advice set out in PPS25. EA state we should make reference to rainwater harvesting, reducing run-offs and SUDS to reduce the impact of new development in all locations.
- 7.2 The Highways Agency (HA) have pointed out that they will need to assess whether the proposed development will cause a compliance problem from 2010 in terms of air quality in the vicinity of the strategic road network. They point out that if the LDF relies on measures on the Strategic Road Network, the HA may not be able to deliver them if it causes or exacerbates a compliance problem. They have offered assistance with the methodology to assess the effect of development on air quality.
- 7.3 The comments from these two statutory consultees raise significant issues that will be taken on board as the core strategy evolves.

8.0 Key Issue 1 – Sustainable Development

Q1. Please tell us how much you agree or disagree with the following statements.

The Core Strategy should:

	<i>Strongly agree</i>	<i>Agree</i>	<i>Slightly Agree</i>	<i>Slightly disagree</i>	<i>Disagree</i>	<i>Strongly disagree</i>	<i>No opinion</i>
Require high levels of energy efficiency in all new development	53.5%	23.8%	5.0%	0.0%	3.0%	2.0%	4.0%
Require all new developments to provide at least 10% of their energy needs from renewable sources	32.7%	24.8%	9.9%	5.9%	7.9%	4.0%	3.0%
Promote the development of a renewable/sustainable energy plant in the Borough (e.g. large wind turbine or biomass woodchip burner)	24.8%	21.8%	18.8%	5.9%	3.0%	5.9%	9.9%
Allow the addition of sustainable energy technologies to existing buildings	31.7%	38.6%	12.9%	0.0%	0.0%	1.0%	5.0%
Require water efficiency measures in all new development	51.5%	23.8%	3.0%	2.0%	3.0%	2.0%	4.0%

- 8.1 This key issue is split into two separate sections of questions, the sustainable design issues and the waste issues. In Q1 it can be seen from the table above that there is particularly strong support for the policy options that require high levels of both energy and water efficiency in new buildings (52%). There was also good support from the questionnaire responses (58%) and the free text responses for policies requiring all new development to provide 10% of their energy from renewable/sustainable technologies. 18% of questionnaire responses disagreed with this option. Concerns cited related to the feasibility of developing particular sites and the potential for this option to stifle regeneration. The Forestry Commission highlighted the role wood fuel and biomass could play which in turn could benefit rural skills and employment. Although this option could create some added initial costs to developments, Government has recently made it clear that this will be a requirement of planning policies (Speech by Yvette Cooper 26th June 2006).
- 8.2 The addition of sustainable energy technology to existing buildings was very strongly supported and had the lowest level of disagreement of any question in the whole document. One representation saw retrofitting renewable technologies as essential to meeting targets to reduce greenhouse gas emissions. Any concerns expressed about retrofitting renewable technologies into existing buildings related to the impact on the character of the area.
- 8.3 The lower level of support for the promotion of an energy plant in the borough arose from concerns expressed through written responses that this was difficult to respond to without more information. Smaller scale technologies were preferred to a large landmark scheme in the borough, which was generally seen as having a potentially damaging impact on existing amenities. These concerns are reflected in the 15% of respondents' disagreement with such an option. Where supported, a large scale sustainable/renewable energy scheme was seen as being an aid to economic development.
- 8.4 Options seeking water conservation measures were supported (78%). RSPB and English Nature both highlighted the importance of this in relation to the presence of water dependent habitats located within the borough, which could be threatened by increases in abstraction related to increases in water consumption in new homes.

Q2. Please tell us how much you agree or disagree with the following statements.

The Core Strategy should:

	<i>Strongly agree</i>	<i>Agree</i>	<i>Slightly Agree</i>	<i>Slightly disagree</i>	<i>Disagree</i>	<i>Strongly disagree</i>	<i>No opinion</i>
Promote the 'waste hierarchy'. This means reducing the amount of waste we produce in the first place, then to re use, recycle and recover as much value from the materials before they are disposed of	59.4%	21.8%	2.0%	1.0%	1.0%	0.0%	5.0%
Include a policy relating to sustainable design and construction to minimise waste production.	47.5%	28.7%	5.0%	2.0%	1.0%	0.0%	5.0%
Promote more local recycling points	49.5%	20.8%	7.9%	0.0%	4.0%	1.0%	5.9%

8.5 Q2 relates to the options for dealing with waste sustainably. The promotion of the waste hierarchy received the highest 'strongly agree' responses of any question. The other two questions received similarly high levels of agreement. The Forestry Commission also expressed support for policy NRM5 of the draft SE Plan relating to sustainable timber products and sustainable construction methods. The options put forward that take on board the principles being promoted through the County Minerals and Waste LDF are preferred by the respondents.

8.6 One of the primary means of achieving sustainable development is through the locational policies of spatial plans. It is essential that facilities and activities are co-located to minimise the need to travel and in locations which offer the widest range of travel choices. These principles are embodied in the Local Transport Plan as well as National planning policy. Where such locations exist or can be created, development should be intensified.

8.7 A strategic approach to development is being taken in the South Hampshire sub-region under the auspices of PUSH. This means that a consistent approach to the delivery of sustainable development policy is important. The South Hampshire authorities are working towards a common policy framework in accordance with the policies set out in the submission to the draft SE Plan. Whilst there must be a consistent baseline of policy it is also essential that the individual authorities are not constrained in ensuring that sustainable development is delivered in a manner which is integrated with the unique characteristics of the area. The coastal, wooded, accessible and exposed location of Havant means that solutions should be sought which make the most of these local features.

8.8 Preferred Policy Directions -

- **Establish density ranges for development relating to accessibility to services by a variety of transport methods;**
- **Require sustainable building design including maximising energy efficiency, water conservation and SUDs systems;**
- **Require developers to provide a % of the energy demand from renewable energy for housing and commercial schemes.**
- **Ensure renewable energy proposals which are appropriate for the natural and built environment of Havant.**

- **Require sustainable construction methods which maximise use of recycled materials, minimise waste production and promote recycling;**
- **Encourage sustainable/renewable technologies using criteria based policies which exploit the natural resources of Havant without undermining the character of the borough.**

9.0 Key Issue 2 – Economy

Q3. Please tell us how much you agree or disagree with the following statements.

The Core Strategy should:

	<i>Strongly agree</i>	<i>Agree</i>	<i>Slightly Agree</i>	<i>Slightly disagree</i>	<i>Disagree</i>	<i>Strongly disagree</i>	<i>No opinion</i>
Release some poor quality employment land and premises for alternative uses	23.8%	33.7%	11.9%	3.0%	6.9%	3.0%	8.9%
Focus on identifying sites for offices, manufacturing and warehouse distribution	7.9%	22.8%	22.8%	10.9%	8.9%	5.0%	10.9%
Identify land for employment generally without specifying any particular type of end user	7.9%	31.7%	15.8%	7.9%	8.9%	6.9%	8.9%
Promote a major tourist development on Hayling Island centred on its windsurfing/sailing heritage	20.8%	28.7%	13.9%	5.0%	6.9%	6.9%	9.9%
Promote a marina development at Broadmarsh, including related hotel and leisure facilities	12.9%	11.9%	6.9%	6.9%	2.0%	38.6%	12.9%
Promote development in Havant and its surroundings to establish the area as a short break destination	14.9%	27.7%	19.8%	6.9%	5.9%	4.0%	13.9%
Continue to resist out-of-centre shopping development in favour of in-centre or edge-of-centre shopping development	30.7%	33.7%	10.9%	5.0%	3.0%	1.0%	7.9%
Promote the use of compulsory purchase order powers to enable shopping development in the heart of centres or on their edges	7.9%	25.7%	15.8%	8.9%	6.9%	8.9%	16.8%
Seek to maintain the same number of shops in Leigh Park Shopping Centre	13.9%	21.8%	7.9%	6.9%	8.9%	5.0%	24.8%
Promote the redevelopment of part of Park Parade in Leigh Park Shopping Centre	18.8%	32.7%	7.9%	5.0%	3.0%	0.0%	24.8%

9.1 Q3 considered responses to the options in relation to the borough's economy. It is clear from the table that the responses to these options are more evenly spread throughout the range compared to the responses to the key sustainability issues. Q3 deals with three topics, employment land, tourism and shopping. These are analysed below.

9.2 **Employment Land** - In relation to employment land the point about the release of some poor quality land/premises resulting in the need for new greenfield releases as replacement has variable support in the questionnaire and from general responses. Most of the general comments support the retention of employment land but query the definition of 'poor quality' employment land where the possibility of future alternative development exists. The Council's current policy is aimed at preventing the loss of employment land but does allow for some flexibility to change to those sites or premises which are financially unviable, restrict potential and where a greater need exists for alternative uses, particularly housing. The established principle is that the applicants must demonstrate why sites or premises are considered 'poor

quality'. The Council's Employment Land Review will also identify which areas are least viable.

- 9.3 In relation to the type of employment uses and whether or not it should be market led there is less clear direction. The direction of long term employment change is uncertain and whilst manufacturing has declined in Havant, global markets are dynamic and will continue to evolve which could result in manufacturing growth. Flexibility would therefore appear to be the priority option for employment space.
- 9.4 A number of respondents raised fundamental concerns as to the methodology underpinning the PUSH growth agenda which is based on 3.5% growth in GVA per annum by 2002. It is argued that this may not improve the quality of life for existing residents and could result in the migration of higher earners and create greater economic disparity. It has been suggested overall GVA growth is misleading and GVA per capita or '*index of sustainable environmental welfare*' would be better measures. The economic targets mentioned in the Core Strategy Issues and Options Consultation Paper have been set by the Regional Planning Authority and adopted by PUSH. GVA is a recognised measure of economic activity and the methodology arises from the work undertaken by the Regional Planning Authority and therefore lies outside the scope of the Council's Core Strategy. The soundness of this approach will be tested at the Examination in Public of the South East Plan.
- 9.5 On more specific issues relating to employment it was considered that the focus should be on providing jobs for those unemployed persons living close to Dunsbury Hill Farm including jobs for the low skilled such as processed food production and packaging. There was also concern expressed about the location of employment development in relation to residential areas and that where development is likely to generate HGVs the end user of the development should be specified. The future of Dunsbury Hill Farm was raised by a number of respondents seeking continued involvement in the outcome of its development. This development is likely to contain a range of employment use types within the B1, B2 and B8 classes which should provide sufficient job opportunities for a range of different skills. The nature and type of employment to be provided in the future will be examined by the Employment Land Review which will be undertaken this year. At this stage flexibility of employment land is a preferred option. One objector was site specific as to the future of Copsey's Nursery site.
- 9.6 Many of the policy initiatives suggested by respondents are already embodied in the HBDWLP, although one respondent suggested that new employment should be more '*open*' in terms of the permitted use classes. Currently protection is only afforded to sites falling within the B use classes and widening the policy would help in this respect. The respondent has suggested the introduction of support facilities to cater for the needs of businesses and employers which could include health and fitness studios, day nurseries, crèches, educational uses, and financial/professional services. Providing these types of facilities would help existing industrial estates to be more sustainable this is a policy initiative that could be given further consideration.
- 9.7 **Tourism** - There is strong support for the option of promoting a major tourist development on Hayling Island centred on its surfing/sailing heritage. This is the vision behind the recent unsuccessful Big lottery bid and remains valid. This ties in with the promotion of the area for short breaks based on the boroughs accessibility to a very wide range of attractions.

- 9.8 Generally the Core Strategy's broad approach to supporting tourism was supported but some respondents said the emphasis should be on promoting low key tourist development for windsurfing on Hayling Island. Development on Hayling Island would be dependent on providing the necessary infrastructure particularly highway access. It was also considered important to promote longer stay trips which could take advantage of the existing caravan and holiday centres on the Island. These sites should be promoted for tourism purposes but subject to environmental and development control criteria. The Core Strategy should acknowledge reliance on the private car for many and leisure and tourism related journeys. It is clear from the responses received that the policies in the current plan reflect the nature and type of comment received. However a Tourism Plan is in the course of preparation and this will also address many of the matters raised by the consultation. The importance of Emsworth as a visitor destination must also be acknowledged.
- 9.9 The response to the options regarding Broadmarsh shows the greatest level of disagreement to any of the core strategy questionnaire statements. The document text states that a marina/hotel proposal was made in 2001 for this accessible area which is also subject to international nature conservation designations. The question was put in order to stimulate debate about the options at Broadmarsh and this has been successful. A strong environmental lobby has rejected commercial development in the area and suggested that if anything should happen it ought to be related to the interpretation of the natural environment.
- 9.10 The general responses on the future of Broadmarsh as a potential future employment site were in unanimous opposition to its development for that purpose. The feeling is that there would have to be an overriding reason in the public interest to seek its development for purposes other than that connected with its designation as part of the Strategic Gap and wildlife coastal park. Some respondents suggested limited development connected with wildlife based tourism which could include a visitor centre and restaurant.
- 9.11 Since the publication of the embryonic proposals for the development of Broadmarsh in 2002, there has been further investigation into the future by a Broadmarsh Review Panel. A wide range of issues were covered in the review and many individuals and interest groups gave evidence to the Panel. In March 2006, the Council's Executive approved a draft Management Plan for Broadmarsh and resolved to consider the longer term development of the site as part of the emerging LDF and wider sub-regional policies. Broadmarsh is a strategic site from any viewpoint. Bearing in mind its proximity to the internationally designated harbour the European legislation that protects the area will be likely to be an overriding factor. English Nature have stated that *'development is likely to have an adverse affect on the integrity of the designated sites, therefore only overriding reason of public interest and an ability to secure and guarantee appropriate compensation would enable the Secretary of State to allow any development'*.
- 9.12 The options for the area would appear to be limited. The Council now needs to remove the uncertainty surrounding its future by making a final decision as to what course of action it wishes to pursue. An environmentally led scheme which could generate some commercial activity that only had a positive impact on the designated habitat would appear to be an environmentally led 'win, win, win' option.
- 9.13 **Retail** - Responses highlight a number of issues. Leigh Park is the most poorly performing shopping centre in the borough and the future of the centre was highlighted in the consultation document. A recent study has shown that there is too

much retail floorspace. Some contradiction is seen in the response to the Leigh Park Centre options in that there is an agreement to maintain the same number of shops but a slightly stronger agreement to re-develop part of Leigh Park Centre for alternative uses. One thing that stands out is the high levels of 'no opinion' in relation to the options for Leigh Park Centre.

- 9.14 One respondent suggested that the fortunes of the centre could be improved if the Civic Centre was moved there. This is an interesting suggestion which could be explored in the preparation of the Urban Design Framework which is programmed to commence next year. There is support for the regeneration of this centre and proposals which downsize its retail content could deliver more diversified uses such as that suggested
- 9.15 There was widespread support for a '*town centres first*' approach to the development of retail facilities. This is in line with current central government and local plan policies. Compulsory purchase to enable town centre shopping development is not as strongly supported. Some comments related more to town centre initiatives which fall outside the scope of the LDF. Adverse comment was received to the developments currently under way at Potash Terrace and Solent Road which are seen as not contributing to overall town centre vitality and viability. This of course, remains to be seen.
- 9.16 The future of Waterlooville Town Centre was also raised by other respondents. East Hants District Council support the aim of expanding the town centre which they see as a more sustainable shopping location for their residents living in the south of the district. One respondent considered the proposed relocation of the Asda store to be excessive in relation to the shopping needs of the MDA population. Whilst the future of the existing Asda store remains unresolved, its relocation in principle has been accepted by the Council following adoption of the Urban Design Framework in 2004. The proposals to expand the town centre are more to do with the shopping needs of the wider Waterlooville catchment than the needs of the new MDA residents. A new local centre is proposed for the MDA which will cater for the day-to-day and top-up requirements of the new residents. It will only provide small scale retail facilities. The LDF will need to determine the scale of major proposals for the town centre in relation to the residential and employment expansion already agreed.
- 9.17 **Preferred Policy Directions -**
- **Protect existing employment sites to minimise greenfield releases and maintain as wide a range as possible of locations. Allow change of use of existing employment land in exceptional cases where a strong justification can be proven by the developer and this is confirmed in the Employment Land Review.**
 - **Encourage employment proposals that provide flexible spaces that can adapt to changing economic requirements.**
 - **Provide employment opportunities for local people, particularly in areas of recognised unemployment.**
 - **Encourage uses that will complement the employment areas, e.g. nurseries, recreation and eating facilities.**

- **Encourage development at Havant’s coastal attractions that will enhance the distinctive natural, economic and social qualities of the particular location.**
- **Encourage development at Broadmarsh that is led by improvements to the natural environment and does not have any adverse impact on the nearby internationally designated habitats.**
- **Promote the diversification of Leigh Park Centre, which will include the loss of some existing retail space.**
- **Pursue vigorously a town centre first approach to retail development.**
- **Encourage major retail enhancements at Waterlooville commensurate with the scale of developed planned for the MDA.**

10.0 Key Issue 3 - Housing

Q4. Please tell us how much you agree or disagree with the following statements.

The Core Strategy should:

	<i>Strongly agree</i>	<i>Agree</i>	<i>Slightly Agree</i>	<i>Slightly disagree</i>	<i>Disagree</i>	<i>Strongly disagree</i>	<i>No opinion</i>
Require new housing to be built at densities higher than the current average of 36 dwelling per hectare, taking into account local character	5.9%	19.8%	10.9%	9.9%	18.8%	20.8%	6.9%
Raise affordable housing requirements above the 30% currently sought	12.9%	14.9%	13.9%	4.0%	18.8%	19.8%	8.9%
Require the majority of affordable housing to continue to be social rented	8.9%	18.8%	15.8%	14.9%	5.9%	16.8%	10.9%
Require larger housing developments to include a range of dwelling types and sizes, and at least 50% of all new dwellings to be either 1 or 2 bedrooms	7.9%	27.7%	19.8%	7.9%	10.9%	8.9%	10.9%
Provide broad guidance on the most appropriate type of dwelling to be provided on each site, but ultimately let the market decide	20.8%	21.8%	14.9%	5.9%	15.8%	7.9%	6.9%

10.1 One of the key issues facing the borough is how to accommodate the increasing levels of house building. Havant is a physically small borough, with a range of significant development constraints affecting the options realistically available. The options for achieving the current commitment of 6301 new houses by 2026 initially revolve around the variable of housing density. Lower densities mean larger areas of land are required to accommodate the total housing requirement. In order to achieve sustainable house building in terms of accessibility, community development and regeneration the priority is to make the most effective use of the existing built up areas. However, there can be a fine line between housing densities that make the best use of land in the built up areas and development densities which could undermine the character of these places which make them sustainable communities in the first place. There is a clear policy direction apparent from the responses to the questionnaire that lower densities are preferred.

Q. 5 The Council is committed to identifying land for 6301 new homes over the next 20 years. The majority of these will have to be built in the existing built up areas. The remainder will have to be built on greenfield sites. The amount of homes needed on greenfield land will depend on the density of development within the built up areas. The options for the different housing density and

what it will mean for greenfield housing development are shown in the diagram. Please tell us which one of the three options, you think is right for Havant.

- 10.2 The lower density option was the preferred option in Q5 with 33% selecting option 1; 28% option 2 and 17% selecting option 3 (the higher density option). Q5 follows through to the relationship between the densities achieved in the built up areas setting the amount of greenfield development that will be required. The lower density option 1 indicates that respondents value the least impact on the character and quality of the existing built up areas over the loss of more greenfields. The response to Q6 are shown below:

Q.6 Please rank each area in terms of suitability for new housing development (1 being the most suitable for housing and 9 being the least suitable)

Q6 Responses	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Area 9
1st Pref	16	24	9	5	2	3	4	4	7
2nd Pref	10	6	22	8	7	4	5	4	7
3rd Pref	14	9	8	8	7	8	6	6	6
4th Pref	9	6	10	14	8	2	6	7	8
5th Pref	6	8	4	12	8	7	8	6	10
6th Pref	4	2	2	7	11	12	9	8	11
7th Pref	4	4	4	6	11	15	13	7	5
8th Pref	1	5	8	4	7	5	9	17	15
9th Pref	5	5	3	6	5	11	4	12	19

- 10.3 Some respondents ranked their own areas the least favourite, as might be expected. Nevertheless, a simple analysis of the Q6 responses does give some value in terms of some preferences standing out. Area 1 (N of Cowplain) scored consistently high in the first three preferences. Area 2 (A3m corridor) scored the highest 1st preference, closely followed by Area 3 (N of Leigh Park) with the highest 2nd preference. At the other end of the scale there is a clear indication that Area 8 and 9 (N and central Hayling) are the least favoured areas with low 1st preferences and highest 8th and 9th preferences. Areas 5 and 6 (Portsmouth Hill and Broadmarsh) scored the lowest 1st preferences.
- 10.4 There is a relatively even spread of responses to affordable housing which does not give a particularly strong policy direction. The highest scores in relation to the amount of affordable housing which should be sought do not support any increase in the % target. In terms of the type of affordable housing appropriate to Havant there is stronger agreement that social rented should continue to be the focus for affordable housing, although this is tempered by the second highest % strongly disagreeing with this direction.
- 10.5 In terms of general dwelling types there was a relatively positive agreement to the policy direction that currently exists in the HBDWLP to seek up to 50% of new dwellings to be 1 or 2 bedrooms. This is to some extent tempered by a similarly positive direction that the market should ultimately decide on the type of dwelling. This dichotomy was also found in the general comments where there is some concern that family housing is required rather than flats.

- 10.6 The free text comments regarding housing issues can be grouped into a number of key themes, while a couple make points about the overall approach of the consultation paper. The EA has called into question whether we actually have presented real options to be considered. This has had a knock-on effect with the Sustainability Appraisal. The EA have also pointed out that Appropriate Assessment is required.
- 10.7 Many respondents objected to the overall housing numbers in the SE Plan. Most have stated that the numbers are too high, but some have correctly pointed out that our work should be sufficiently flexible to accommodate an amended allocation following the EiP. Some have asked why we need additional housing when there is no significant population increase predicted. Some have queried whether an estimated 500 dwellings at the MDA count towards the 6301 target (they do). Others have stated that the reserve allocation should be counted as commitments.
- 10.8 Objections to the estimates of urban capacity have been received, including one from HCC. A number of people have submitted a series of questions regarding empty homes. Resident's Associations have supported the redevelopment of brownfield land but have reservations regarding the redevelopment of residential plots and gardens.
- 10.9 GOSE have asked for clarity as to what 30% affordable housing actually means. A few objectors have stated that setting a percentage requirement is too rigid, that we should take into account need, site viability and further evidence is required. There is support for the continuing use of shared ownership, key worker housing and low cost home ownership. One respondent has stated that the level should be set at 35% in line with the draft SE Plan. East Hants District Council has suggested a sliding scale.
- 10.10 As with the responses to the questionnaire on density there was more support for lower density options, arguing against blanket densities, taking into account local character, accessibility, parking standards and provision of decent-sized family accommodation with sufficient amenity space. Some objectors asked why the high density option needed to be linked to the loss of open space within the urban area.
- 10.11 One Community Board called for a Plan, Monitor and Manage policy to prevent the unnecessary development of greenfield sites. A number of representations identify and promote individual sites for urban extensions. A number of objectors have set out reasons for their ranking of suitability for new housing development. These include Chichester Harbour Board identifying locations 7, 8 and the coastal edge of 9 as being of moderately or highly sensitive to change. EA have advised against the Broadmarsh location. Other comments have been to point out the importance of the integrity of the coastal plain and the benefits of the Strategic Gap. However, GOSE have pointed out paras. 24 & 25 of PPS7 which question the need for Strategic Gap designations.
- 10.12 Comments have been made that evidence is required to substantiate the claims that Leigh Park can accommodate significant development, both inside and as urban extensions. Southern Water has provided details of infrastructure costs for each location. One objector has commented that the opportunity to deliver planning gain should also be taken into account. Finally, the Highways Agency have stated that impact of development on trunk roads should be addressed to meet tests of soundness iv and vii, and that transport should be addressed at the Preferred Options stage.

10.13 GOSE think we should allocate broad locations for gypsy and traveler sites in the Core Strategy. East Hants District Council has stated that we should work with them on this issue.

10.14 Preferred Policy Directions -

- **Prioritise urban regeneration and brownfield development within the existing built up areas**
- **Only permit high housing densities that will make a positive contribution to the character of the locality through high quality design.**
- **Only release greenfield housing sites for development when it is shown that insufficient brownfield sites are being developed to meet the housing trajectory. A Plan Monitor Manage approach will be used to ensure a phased release of greenfield land.**
- **Create a balanced mix of dwellings in the borough to meet the needs of existing and emerging housing markets.**
- **Clearly set out how much and what type of affordable housing is needed in the different parts of the borough.**
- **Work with neighbouring council’s to ensure that the needs of travellers and gypsies are met, including the identification of an appropriate site(s).**

11.0 Key Issue 4 – Improving Transport

Q7. Within the document the Core Strategy - Issues and Options there are 11 objectives in the Preferred Option of the Hampshire Transport Plan. To help us understand your preferences, please indicate which 5 are the most important for Havant

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11
1st Preference	7.9%	6.9%	6.9%	5.9%	5.0%	5.0%	1.0%	5.9%	5.9%		0.0%
2nd Preference										10.9%	
3rd Preference	5.0%	6.9%	8.9%	9.9%	3.0%	4.0%	2.0%	5.9%	6.9%	7.9%	3.0%
4th Preference	5.0%	6.9%		3.0%	5.0%	5.0%	2.0%	4.0%	6.9%	5.0%	8.9%
5th Preference			10.9%								
	5.9%	5.0%	4.0%		2.0%	3.0%	2.0%	6.9%	7.9%		2.0%
				11.9%						10.9%	
	5.9%	7.9%	3.0%	5.9%	5.9%	5.9%	2.0%	3.0%	4.0%	5.9%	9.9%
	30	34	34	38	21	24	9	26	32	41	24

11.1 A simple analysis of the various Local Transport Plan preferred options show that options 4 (*Develop quality transport interchanges and links for the integration of all transport modes*) and 10 (*Direct high density development to those areas well served by a choice of transport modes and to areas close to transport interchanges, and ensure that development which would generate large amounts of traffic or are of sub-regional importance are located in areas accessible by a range of transport services*) are the most favoured for Havant. The least favoured approach is option 7 (*Provide “state of the art” communications, signing and management systems*).

- 11.2 Some respondents felt that because the transport options appear to have already been set in the Local Transport Plan (LTP) then there was little point commenting. Other felt that the LTP was not specific enough to Havant. The issues that need to be emphasised for Havant are the lack of a cycleway network linking a variety of facilities, alternative modes of travel to the private car on the existing network, influencing travel patterns through land use and the importance of improvements to Hindhead to boost the economy.
- 11.3 Network Rail seeks to maximise its return on its landholdings and developer contributions from linked developments. The LTP is described by a residents association as 'potential disasters hidden under inscrutable words', comments were also made about public transport not being for the public. The Highway Agency make broad comments on the value of local policies reducing the need to travel, encouraging sustainable modes, public transport and the need to take into account the existing network in delivering new development.
- 11.4 The Council must work with the highway authority (Hampshire County Council) to ensure that the Local Transport Plan and Solent Transport Strategy deliver the transport improvements which the borough needs. The new bus station has improved the public transport offer but there are current cuts to popular bus services. The road network is being improved at Harts Farm Way. The Highway Agency has made the point that the capacity of the road network is an issue that could impact on future development, particularly significant developments such as the MDA and Dunsbury Hill Farm which will generate new flows on the strategic road network.
- 11.5 The LTP has a longer-term strategy beyond its headline period of 2006 – 2011 to reduce, manage and invest. The longer-term vision is evolving around the concept of 'hubs and spokes'. This involves creating sustainable communities, encouraging fewer and shorter journeys and improving the use made of more sustainable modes – public transport, walking and cycling.
- 11.6 The Council has an adopted cycle strategy that is embedded within the Solent Transport Strategy part of the LTP. Funding opportunities have and will continue to be sought through the LTP, the Council, Sustrans and developer contributions.
- 11.7 The Council has evidence that the borough has good accessibility to a wide range of services and facilities by a variety of transport modes. South West and North East Hayling have the poorest accessibility, as well as relatively low existing densities of development. Accessibility in these areas could to be improved, particularly as they represent relatively attractive natural areas of the borough whose improved accessibility could be linked to tourism.
- 11.8 The borough is located on a number of major transport interchanges – A3M/M27 and London Waterloo/Victoria lines with excellent connectivity to Portsmouth/Southampton Ferry and airport links. It is essential that these resources are used effectively for both Havant and the sub-region as a whole. These significant benefits are strategically critical. At the more local level peak hour congestion on Hayling, in Waterlooville and in Havant are an issue, as with most places in the region. Highway improvements to ease the congestion must not be at the cost of highway safety, which must be emphasised as the overriding priority.
- 11.9 The Hampshire LTP is the delivery plan for transport improvements in Havant but the LDF should emphasise the key issues that are already identified in the LTP.

11.10 Preferred Policy Directions -

- **Work as part of PUSH to secure the regional infrastructure which is essential to the realisation of the sub-regional growth agenda.**
- **Improve accessibility to the borough's settlements, reduce congestion and improve traffic flows. Improve sustainable transport facilities. Improve road safety and quality of life.**
- **Develop quality transport interchanges for the all transport modes**
- **Direct high density development to those areas well served by a choice of transport modes and to areas close to transport interchanges. Ensure that developments which would generate large amounts of traffic or are of sub-regional importance are located in areas accessible by a range of transport services.**
- **Take a positive role in the implementation of the Hampshire LTP and Solent Transport Strategy to ensure that the development opportunities within the borough provide benefit to and derive benefit from the local transport network.**

12.0 Key Issue 5– Natural & Built Environment

Q8. Please tell us how much you agree or disagree with the following statements. The Core Strategy should:

	<i>Strongly agree</i>	<i>Agree</i>	<i>Slightly Agree</i>	<i>Slightly disagree</i>	<i>Disagree</i>	<i>Strongly disagree</i>	<i>No opinion</i>
Require landscape enhancements within new developments	49.5%	28.7%	5.9%	3.0%	0.0%	1.0%	4.0%
Seek contributions from developers to enhance the public's natural and built environment	46.5%	22.8%	4.0%	5.0%	5.9%	4.0%	4.0%
Protect the historic character of the Borough as a priority	52.5%	21.8%	8.9%	2.0%	0.0%	0.0%	6.9%
Promote bold innovative designs where they do not damage historic townscapes	20.8%	27.7%	14.9%	8.9%	8.9%	2.0%	7.9%
Promote urban design because it has an important role in integrating new development into the built environment	22.8%	33.7%	18.8%	2.0%	2.0%	3.0%	7.9%

12.1 The natural environment options put forward in the questionnaire received high levels of support which considering that developers and their agents made a number of representations indicates that the incorporation of high quality landscapes into new and existing environments is a preferred policy direction. The protection of the historic environment as a priority has very strong support. The pursuit of innovative designs is a less clear direction, although there was still general support. Nevertheless the principle of urban design as a means of integrating new and old received clear support as the way forward.

12.2 Many respondents made the point that the Core Strategy should have strong policies protecting the environmental assets of the borough, particularly the international designations, ancient woodlands and the strategic gaps. The concept that some level of adverse environmental impacts from development is acceptable needs to be challenged. Development should work with the environment to ensure benefits for all.

- 12.3 The omission of Rowlands Castle from the criteria for strategic gap protection was a concern. There was a call for a Denmead/Waterlooville gap and a buffer zone between the proposed South Downs National Park and the urban areas. Not enough is being done to promote the natural attractions of Havant.
- 12.4 A Landscape Character Assessment should be undertaken to identify the many unique parts of the borough and these should be appropriately protected. Havant has to ensure the effective use of the urban edge, which provides an opportunity for countryside access. Footpath networks should be enhanced to improve access to recreation space. Development must protect and enhance local distinctiveness and sense of place, incorporate sustainable construction methods, protect open space and recognise the link between protection and management of access. Greater encouragement of woodland management and recognition of the importance of woodland in maintaining the borough's visual and economic attractiveness.
- 12.5 The Forestry Commission stated that the total woodland cover in the borough is less than England's average woodland cover and that recognition and protection should be given to Havant's 256.45 ha of ancient woodland.
- 12.6 A number of developer interests raised the issue that developer contributions should not go beyond that which is directly required by the development in accordance with Circular 05/05. Conversely developer contributions should not be used as a means of securing planning permission.
- 12.7 Concern is raised regarding the emphasis on 'bold innovative design' and 'urban design'. Would prefer the use of 'good architectural practice' and emphasis on rural design. Would also like to see projected streetscapes to give the public a better idea of the impact of development.
- 12.8 The policy directions that have come out of the responses firstly highlight the level of importance that must be given to the protection of the environment. This will continue to be a priority. Additionally the opportunity that the borough's distinctiveness provides as a catalyst to the regenerative changes that are needed. Traditional views of sustainable development involve balancing of the environmental, economic and social benefits and impacts. This tends to result in one or other of the sustainability themes having a greater share of the balance to the detriment of the others. In Havant there has been an emphasis on economic regeneration to drive improvements to the social issues that impact on the borough, particularly in Leigh Park and Wecock. This has tended to leave the environment to be less of a priority. The concept of 'win, win, win' for all of the sustainability themes that is promoted by Natural England is a powerful vision. With the right emphasis on securing the economic generation that Havant needs this is a concept that could be incorporated into the overall LDF vision.
- 12.9 A comprehensive Landscape Character Assessment (LCA) has been completed for the whole borough as a major piece of the LDF evidence base. This will be further developed through borough design guidance. The LCA provides a sound basis on which to ensure that the best and unique natural features of the borough are both protected and opportunities taken to make more of them.
- 12.10 Concerns about gaps between settlements that are under pressure is an area that needs further exploration. Government guidance in PPS9 seeks to minimise the proliferation of local designations. Nevertheless local gaps are used in East Hampshire and Winchester; therefore there is some justification for consistency with

their local gaps.

12.11 The option put forward in the document to ensure that developer contributions enhance the environment did not suggest that either permission could be bought or that such contributions would be sought beyond what was necessary and appropriate to the development. The point is that the LCA will enable the Council to identify and justify environmental enhancements that can be attributed to developments and that contributions will then be sought to enhance the area's sense of place/distinctiveness and links to adjoining areas that will improve sustainability.

12.12 Less strong support is apparent for 'urban design' and 'innovative design' due to our inherent conservative nature. Rural design is also an issue and is important in the urban fringe interface that is a characteristic of the borough. The critical direction for the built environment of Havant is the need to improve quality in both private and public design. The suggestion for providing projected streetscapes is noted and new software for flythroughs of schemes will be used wherever possible.

12.13 Preferred Policy Directions –

- **Only permit development where it seeks to create benefits to the environment in which it is proposed.**
- **The majority of the boroughs designated habitats and historic heritage sites benefit from statutory protection. Also protect the remaining sites and wherever possible seek their enhancement through contributions from any related development.**
- **Only permit development if it respects and retains or enhances the local character and distinctiveness of the landscape character area in which it is located.**
- **Ensure all new development is of a high quality that protects and enhances the character of the borough and local distinctiveness.**
- **Adopt borough design guidelines, to be prepared as supplementary planning guidance which sets out how development will be expected to respect the different character within the borough.**
- **Consider the delineation of local gaps, such as between Waterlooville/Denmead and Emsworth/Havant/Rowlands Castle, to ensure that the local distinctiveness of the borough's settlements is maintained**
- **Ensure that major new developments create distinctive, sustainable and healthy environments that meet the needs of residents and users and contribute towards the creation of vibrant communities.**

13.0 Key Issue 6 – Changing Coastline

Q9. Please tell us how much you agree or disagree with the following statements.

The Core Strategy should:

	<i>Strongly agree</i>	<i>Agree</i>	<i>Slightly Agree</i>	<i>Slightly disagree</i>	<i>Disagree</i>	<i>Strongly disagree</i>	<i>No opinion</i>
Show existing coastal defences and where they could be realigned and strengthened	36.6%	27.7%	12.9%	1.0%	0.0%	0.0%	13.9%

13.1 The options relating to the changing coastline involve balancing the needs of people and the environment; this means that some of the borough's 48 km of coastline will change to some extent or another. There are a range of uncertain factors that affect where this could occur e.g. rising sea levels, wave direction, increased rainfall and more extreme events. Due to the uncertainties of climate change the core strategy needs to show where there are existing defenses so that everyone is aware of the position. This is clearly supported in the questionnaire response.

13.2 The Environment Agency (EA) emphasises the need for a Strategic Flood Risk Assessment (SFRA). Havant is taking a lead in ensuring that the SFRA is produced for the whole sub region. The SFRA will provide the detail of which areas could be developed, which could be protected and which areas have the highest risks. The SFRA is therefore a key piece of the evidence base. The nature conservation designations in the harbours also mean there is a requirement for an Appropriate Assessment; development would only be allowed which affect the designated harbours if there was an over-riding public interest for it. The Shoreline Management Plan (SMP) will link to the SFRA and one of its outcomes will be the identification of areas which may benefit from re-alignment. The next SMP (due in mid 2008) will be too late to be part of the Core Strategy evidence base, but will feed into the Allocations DPD.

13.3 The coastal area is a significant tourist resource and necessitates an integrated approach with flood management. Priority should be given to develop in areas of minimal risk whilst activities that require waterside locations could be developed. The coast is a major asset both in terms of its nature and as a focus for regeneration, although concerns over the unsuitability of Broadmarsh are again highlighted.

13.4 There is a need for continuing stakeholder involvement in the changing coastline theme. It affects many people's futures, the findings of the SFRA will be communicated widely and the options that flow from that will be subject of the preferred options stage.

13.5 It is clear that the coastline will continue to change and that the rate of change could alter. It is also clear just how important the coastline is to Havant's future in a range of different ways, e.g. tourism, internationally important habitat, flood risk and potential for regeneration. However, there remains uncertainty in respect of the degree of change and what the impact of those changes will be.

13.6 Preferred Policy Directions –

- **Take a precautionary approach towards development proposals affected by and affecting the coastline.**

- **Given the uncertain impact of climate change on the coastline adaptive policies are preferred.**
- **Involve the community in the findings of the SFRA**
- **Make the most of the coastline resource for regeneration where such benefits also benefit the natural environment.**

14.0 Key Issue 7 – Infrastructure

Q10. Please tell us how much you agree or disagree with the following statements. The Core Strategy should:

	<i>Strongly agree</i>	<i>Agree</i>	<i>Slightly Agree</i>	<i>Slightly disagree</i>	<i>Disagree</i>	<i>Strongly disagree</i>	<i>No opinion</i>
Focus on the quality of accessible open spaces rather than their quantity	17.8%	22.8%	12.9%	5.9%	12.9%	9.9%	6.9%
Review the future of the Havant Leisure Centre to see if the pattern and range of recreation facilities can be improved	22.8%	32.7%	12.9%	1.0%	4.0%	2.0%	13.9%

14.1 The infrastructure topic includes all types of infrastructure such as Education, Health and Open Space. The questionnaire focused on two particular infrastructure issues that could have a significant impact on the borough. These relate firstly to the idea of focusing on quality open space rather than quantity. There was a majority of support for the quality focus, although general comments on the issue showed some strength of feeling that the quantity of space is the key. The second issue showed a clear steer to a review of the Havant Leisure Centre. The outcome of such a review will drive the policy direction in terms of leisure in the borough.

14.2 Several consultees identify the importance of open space in terms of quantity rather than quality as once such space is lost it is gone forever. The recent open space audit has moved away from the traditional view of space for space sake to focusing on strategic quality spaces. Although this shift in emphasis is driven to some degree by management and resourcing issues, rundown open spaces do significant harm to the sense of place of an area. If a local community is unable to care for its spaces then rationalisation could be the way forward. Some also refer to the expansion of recreation by applying specific standards and others to particular locations including Campdown, Dunsbury Hill Farm and along the coast including existing and proposed marinas. Only three comments refer to the quality of open space and one of these points out that it needs to be defined. Two consultees objected to the loss of the Havant Leisure Centre and a third considered its future to be inappropriate for the Core Strategy. Current work on the Borough Leisure plan will provide a clearer evidence base on this issue. One consultee advised that a sense of place and good quality cultural facilities is essential for sustainable communities and the importance of partnerships for implementation.

14.3 Specific policies can be introduced in the Core Strategy to respond to these comments. The potential for increasing participation in various types of recreation can be addressed by policies for collaboration with sport organizations and the development of strategic leisure locations.

14.4 Several consultees pointed out that development should be preceded by infrastructure and there was a requirement for it to be delivered as a condition of development. One neighbouring District Council was concerned that all types of infrastructure should be in place to reduce pressure outside the borough. Another

organization has requested the inclusion of a policy on prison development; although they make no specific proposals and government circular 03/98 provides the necessary policy basis should any specific proposals be made in the future.

- 14.5 The need for the phasing of infrastructure is accepted as a central plank of the PUSH growth agenda. However, while the borough should not put pressure on other Districts there might be potential for using existing infrastructure more effectively. The Local Authority areas should not be regarded as self-contained. The borough would like to work in partnership with its neighbours to achieve the sustainable use of infrastructure within catchments which rarely accord with council boundaries.
- 14.6 One objection referred to the need to retain the proposals for a reservoir at Havant Thicket and the treatment works at Kingscroft Farm rather than developing these greenfield areas for housing. Guiding principles on water conservation were offered for inclusion in the Core Strategy.
- 14.7 These concerns are accepted and there is no question of these established infrastructure requirements being superseded by housing proposals. It is expected that the reservoir will be available as a major leisure attraction adding to the boroughs green infrastructure. The borough is keen to work closely with public utility providers to ensure that new development uses resources efficiently and wherever possible mutual benefits can be achieved.
- 14.8 One consultee drew attention to the inconsistency between the reference to 'community facilities' in the Introduction to the Consultation Paper (p. 6) and the grouping of them under the heading of 'Infrastructure' in the Key Issues section.
- 14.9 This comment is accepted and it is suggested that 'community facilities' are included in 'Social Infrastructure' and that a clear distinction can be made from 'Public utilities'.
- 14.10 **Preferred Policy Directions –**
- **Do not permit significant new development and developments which cumulatively would put undue pressure on existing infrastructure until such infrastructure deficiencies are resolved.**
 - **Work in partnership with local communities and the relevant organisations to explore means of retaining and enhancing open spaces in a sustainable manner prior to any redevelopment and rationalisation decisions being taken.**
 - **Permit proposals for a reservoir at Havant Thicket with associated benefits of linked habitat/improvements leisure/recreation/educational facilities to make a positive impact on the regeneration of the borough.**
 - **Encourage development which enhances and reinforces the cultural aspects of the borough.**
 - **Enhance community facilities as a priority, whether through rationalisation, renewal or renovation together with the formation of sustainable community partnerships.**

- **Create a policy which seeks to ensure developer contributions towards the provision of necessary infrastructure.**

15.0 Other Issues Raised

- 15.1 Respondents raised a number of issues which they felt were either missing or needed highlighting. These included reference to reducing crime and disorder; telecommunications development and the poor health, pregnancy and welfare profile of the borough.
- 15.2 The importance of crime and disorder and its link to the community strategy are highlighted in the section 'Key Issue for the Core Strategy'. The issue of community safety is a major feature of the Borough Design Guide that is currently being developed. Telecoms are an important part of the infrastructure and again this will need to be confirmed in the document. The borough does have some of the worst deprivation indicators in the county and region in terms of health, young pregnancies and welfare claimants. Whilst consideration was initially given to highlighting these as part of the borough profile it was felt that the Core Strategy should promote options for solving the issues rather than dwelling on them. Nevertheless as part of the borough profile these could be shown to give a broader context of the borough.