

Consultations by Representations stage, Representation Type and Consultee Type

Regulation 27 Publication Late Reps

06/0032 26 Regulation 27
Publication Late reps

Comment

Mr S

Williams

English Heritage

We refer to your letter of 29 March 2010 inviting representations on the above. It is appreciated that the draft strategy was prepared before release of PPS5 'Planning for the Historic Environment'. References to national policy guidance in the submission Core Strategy will need to be updated to refer to this new guidance. Paras. 1.33 to 1.36 refer to key characteristics, issues and challenges facing constituent parts of the Borough and the use of evidence base documents. The section dealing with Leigh Park fails to make any reference to the heritage assets of the area, including the Grade II* Registered Historic Park and Garden, listed buildings, and conservation area that will be affected by the proposed Havant Thicket Reservoir. Mitigation of the impacts of such a development, in a location as sensitive as, this must surely be recognised as one of the key challenges to be addressed.

We welcome the three objectives associated with Section 7 'Caring for our Borough'. Draft Policy CS10 'Protecting and Enhancing the Special Environment and Heritage of Havant Borough', refers to protection and enhancement of statutory and non-statutory heritage designations by managing development in, or 'adjacent to', various assets. Adjacent to is inconsistent with national guidance where the term 'setting' of such assets is used, which may not necessarily be adjacent to the asset, and indeed may be quite some distance from it. All such references should be corrected e.g. para. 10.16. The policy does not appear to distinguish between statutory and locally important heritage assets and the weight to be given to their relative significance when considering proposals (PPS1, para. 17).

We welcome recognition of, and support for, heritage assets having a significant role to play in regeneration schemes (para. 7.03). Para. 7.19 includes a description of green infrastructure, informed by the regional spatial strategy. There is no specific reference to the contribution of the historic environment to green infrastructure and yet the Green Infrastructure Strategy for the PUSH area1 (October 2009), makes specific reference to it, particularly under Theme 3 in relation to local distinctiveness and sense of place. We would like to see it recognised also in the Core Strategy for consistency with this more detailed and relevant sub-regional guidance.

The strategic site profile for the Havant Thicket Reservoir provides information on key site constraints, although this does not appear accurate by suggesting that the conservation area is only 'adjacent' to, rather than part covered by, the proposal. Presumably the reference to Grade II* is meant to be to the Registered Historic Park and Garden, although there is no reference to any of the listed buildings, or their settings being affected. The Havant Thicket Reservoir EIA Scoping report refers at para. 5.7.3 to 'the potential issues which would arise from the construction of the reservoir proposals include: the potential to directly affect below ground archaeological deposits, the direct impact on the registered garden and conservation area, and the indirect impact on the setting of historic structures within the garden e.g. The Beacon which stands on a rise. Construction of the pipeline may also have a direct impact on sub-surface archaeological deposits.' The need to manage the interface between reservoir and Registered Historic Park and Garden must be given appropriate consideration. We note and support the section dealing with 'development requirements', where there is reference to compensating for the loss of and effects on heritage assets. The evidence base needs checking given the conflicting numbers of listed buildings referred to in paras. 7.03 and 10.15. Para. 10.15 distinguishes between listed and locally important buildings, but also refers to almost 40 historic parks and gardens without distinguishing between those of national and those of local importance. Appendix 1 could usefully refer to the Hampshire Historic Environment Record as part of the evidence base and those historic landscape characterisation studies that have been carried out. Given the importance of safeguarding and enhancing heritage assets within the District, not only for their intrinsic value, but also for the positive contribution that they can make to quality of life, tourism potential and regeneration, the adopted Core Strategy should provide an appropriate development plan framework having regard to Section 38(6) of the 2004 Act. We note that it is not proposed to include a specific development management policy on the historic environment and that the Council proposes to rely upon Core Policies CS10 and CS14. Apart from taking account of new PPS5, para. 10.16 should also recognise that South East Plan Policy BE6 also

has a bearing when considering development proposals.
As the glossary reference to 'conservation area' refers to the
1990 Act, it should be a more
accurate reference to Section 69(a).
We hope that this is of assistance and thank you for consulting
English Heritage.

I can confirm that Natural England submitted initial comments on the above document to Havant Borough Council on 17 May 2010. Unfortunately that response failed to include our comments on important landscape matters. These are provided below. We trust that as statutory consultees, these additional comments can be fully taken into account.

Issues of soundness relating to consistency with national or regional landscape policy

Lack of an AONB specific policy

The Chichester Harbour AONB Management Plan has been produced as a statutory requirement of Section 89 of the Countryside and Rights of Way Act 2000 (CRoW Act), and should provide an underpinning from which locally specific policy should be derived. Natural England considers that the locally distinctive qualities and characteristics that make up the outstanding natural beauty of Chichester Harbour AONB provide the justification for a local interpretation of higher-level policy, in accordance with PPS12 and paragraph 11.8 of the South East Plan.

Proposals Map

The Proposals Map submitted with the Pre-submission Core Strategy does not include the AONB boundary, as recommended in paragraph 8.1 of PPS12.

Issues of legal compliance

Incorrect references given to the Chichester Harbour AONB Management Plan

Havant Borough Council's Core Strategy should acknowledge the status of the AONB Management Plan as set out in Section 89 of the Countryside and Rights of Way Act 2000 (CRoW Act). The document currently shows a lack of understanding of the AONB Management Plan and this causes Natural England some concern.

Inadequate wording in Policy DM9: 'Development in the Coastal Zone'

In order to reflect the primary purpose of AONB designation as set out in the Acts which is concerned with the conservation and enhancement of natural beauty, point 1 of Policy DM9 should state 'conserves and enhances', rather than 'respects'.

Finally, Natural England would like to confirm that we support

comments on the document provided by the Chichester Harbour Conservancy. They should be given appropriate weighting as the JAC for the Chichester Harbour AONB.

We thank you for the chance to comment at this stage and we repeat previous offers to discuss these and any other matters relating to the Core Strategy. We look forward to continuing to work with you as your Local Development Framework continues to evolve.

The Document has been thoroughly researched and is easy to read.

The main driving forces are the new Public Service Village and the creation of the new Reservoir between Leigh Park and Hordean. These two projects are welcomed and need to be progressed as soon as possible. Both projects will also be of benefit to residents outside of Havant Borough Council's boundary in West Sussex.

Policies on Open Spaces and Allotments are needed and show clear thinking. Regarding allotments, consideration should be given to creating some half plots as some older residents do not require, nor can they maintain, a full plot.

Capital receipts from the closure of Emsworth Cottage Hospital need to be earmarked for the proposed Medical Centre at Hampshire Farm.

It is important that the upgrading of Thornham Treatment Works is given serious consideration in order to increase capacity and to protect the sensitive environment of Chichester Harbour.

Policies to resist the conversion of smaller dwellings into larger units is welcomed. This practice only reduces the housing stock and adds pressure on new builds.

Local Gaps are of great importance and Havant Borough Council and Chichester District Council should work together to ensure that the Gaps that fall either side of the Hampshire/West Sussex Border are given the strongest possible protection and are designated into the Emsworth/Chichester Strategic Gap.

08/0432 10 Regulation 27
6 Publication Late reps

Comment

Mrs J

Graham

Westbourne
Parish Council

08/0619 2 Regulation 27
Publication Late reps

Object

Mr A

Hayward

Sir,
The proposal to build 250 homes upon the area south of Lower Road is, in accordance with Development laws and policies entirely reasonable.
However, the preference of building upon Greenfield instead of existing brownfield sites in the Havant area, and the destruction of a unique wildlife habitat home to Sparrowhawks and nesting Herons, is against national policy. I, and many others, have had the honour to be proud of an area of Havant that is both rural and accessible, and allows an important and often understated contact with nature at its best. My children have seen rabbits, herons, hawks, pheasants and other wildlife that has offered them an enriching experience that can be rarely found in towns in modern times. I implore that the Council look at the benefits these fields brings to our community not to the residents of Old Bedhampton, but to Havant. Dog Walkers, hikers, children and families, and wildlife that is gradually disappearing from our isle, benefit from the existence of these fields as arable land. I argue that the detrimental effect to our resident flora and fauna, the popularity of the area with walkers and families and the sheer facility that such land brings to our community, makes this development proposal inconsistent with national greenfield development policy. Wildlife; in particular Herons and Sparrowhawks, geese and foxes, should not suffer at the hands of human community expansion. Our children should benefit from the safety, and education that such areas provide. These areas are few and far between and, in accordance with national policy of our coalition government, should be treated as areas exempt from development until ALL other options have been discounted.
I do hope that for the sake of us all, this development proposal is not approved.

10/0023 4 Regulation 27
Publication Late reps

Comment

Threadneedle
Property
Investments Ltd

Policy CS4: Amended paragraph to earlier pre-submission consultation response (in italics):

While the acknowledgement of the role of Havant Town Centre as the principal centre within the Borough is welcomed, as is the commitment to the provision of 13,000m² of new comparison floorspace (at least 9,000m² of which is in the east, including Havant), it is considered that the policy does not place adequate emphasis on development of the identified floorspace within the hierarchy, which would see Havant as the first location where any major new retail development should take place, nor does the policy acknowledge the important role played by existing edge of centre retail developments, including the Central Retail Park, in supporting the role of the town centre and forming part of its retail offer. Central Retail Park offers the potential for linked trips and is well located to the railway station and main bus station, providing a complimentary retail offer to the traditional centre.

10/0027 8 Regulation 27
Publication Late reps

Object

Mr R

Tate

Save Old
Bedhampton
Association

Policy DM1 (page 126) is supported by the 'Open Spaces Plan Final Report' (OSPFP). This report (OSPFP) follows the guidance in PPG17 but in respect of Broadmarsh (pp88/9) it recognises that the Local Plan Inspector felt that the land should be identified as greenspace and that its use by the public as a very popular non-designated country park makes it of sub regional strategic importance.

By its nature, as a coastal resource, the site is not readily interchangeable with other land in the Borough for open space purposes. Page 102 of the report (OSPFP) indicates that the plan seeks to ensure spaces of strategic or Borough wide significance are accessible and of high quality and high value to residents and wildlife. There is nothing to indicate how this will be achieved if the land at Brockhampton West is developed.

PPG17'Planning for Open Space and Recreation' (paragraph 1) suggests that open space sites with strategic significance are assessed at the regional or sub regional level. The unique nature of Brockhampton West brings it within this category but Report OSPFP does not do such an analysis.

If it is to be developed, paragraph 10 of PPG17 requires clarity that the land is surplus to requirements including consideration of other open space functions it might perform and paragraph 11 also suggests that sites that benefit wildlife and biodiversity might be regarded as of particular quality and consequently given protection within plans. Paragraph 17(iv) takes this further and requires consideration of the impact of any development on biodiversity and nature conservation.

So the core strategy is not justified and not consistent with national policy. The strategy could be made more sound if site BD11 were excluded.

Grand Total Consultees: 6

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