



**HAVANT CORE STRATEGY EXAMINATION**

**Conservation, Landscape & Countryside Session**

**8th September 2010**

**Submitted on behalf of  
Markfield Investments Ltd**

August 2010

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## **SECTION ONE – INTRODUCTION**

- 1.1** These representations have been prepared by Boyer Planning Limited on behalf of our clients, Markfield Investments Limited, in relation to the Conservation, Landscape and Countryside Session of the Havant Core Strategy Examination, to be held on 8th September 2010.
- 1.2** We have submitted representations to the Council throughout the Core Strategy process and most recently in respect of the Submission Document. Our representations to the Core Strategy are directly relevant to the list of matters to be examined, and this statement specifically addresses the questions that have been raised that are relevant in the context of our representations.
- 1.3** The Tests of Soundness to be applied to this Core Strategy are those contained within revised PPS12.
- 1.4** On behalf of our client we are also submitting representations in respect of the General and Housing Sessions.
- 1.5** In respect of the Tests of Soundness we consider that, overall, the Core Strategy is sound, but recommend that some amendments are made to improve its soundness. We expand upon these points in our response to the various questions which have been raised by the Inspector.
- 1.6** We set out our response to the questions in Section Two. Our comments have regard to national planning guidance and other material considerations.



## **SECTION TWO – MATTERS TO BE EXAMINED**

### **2.1 Will policy in the Core Strategy be effective in protecting the Borough's Environmental Assets.**

2.1.1 Policy CS10 seeks to protect and enhance the environment and heritage of Havant. It is considered that Policy CS10 provides the basic framework for the protection of the Borough's environmental assets but provides limited detail as to how the individual elements numbered 1 – 8 and 10 will be achieved. Implementation of Policy CS10 is dependant on either national guidance or future Development Plan Documents or Supplementary Planning Documents. This approach is considered to comply with the requirements of a Core Strategy which is to provide broad policy direction rather than dealing in detail. The majority of this policy is therefore supported and considered to be appropriate.

2.1.2 However concern is raised regarding Clause 9 of the Policy CS10 which states that planning permission will be granted for development that *'maintains undeveloped gaps between the settlements of Emsworth/Havant; Havant/Waterlooville; Havant/Portsmouth; Emsworth/Westbourne and Leigh Park/Rowlands Castle.'* As we note in response to the next question, this approach does create potential conflict with national policy guidance. It is argued that this is a local designation, which is not supported by PPS7 (paragraph 24) and as such reference to gaps should be removed.

### **2.2 Should there be a separate policy to protect the AONB? Are local designations still relevant and useful?**

2.2.1 AONBs are national designations. Government advice contained in PPS7 is reasonably comprehensive in relation to the nationally designated areas including AONBs. Paragraphs 21, 22 and 23 of that document set out the detail in this regard. In our view it would not add anything to this Core Strategy if a separate policy to protect the AONB was included. It would merely repeat national policy. More detailed policy considerations can be provided in separate Development Plan Documents.



2.2.2 With regard to local designations, these are not supported by PPS7 (paragraph 24), which states:

***“The Government believes that carefully drafted, criteria-based policies in LDDs, utilising tools such as landscape character assessment, should provide sufficient protection for these areas, without the need for rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas.”***

Paragraph 25 goes on to state:

***“When reviewing their local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining existing local landscape designations. They should ensure that such designations are based on formal and robust assessment of the qualities of the landscape concerned.”***

2.2.3 In our view the Council has taken a blanket approach to the issue of strategic gaps, and has applied them, across the board, to the areas of land between the principal settlements (see the Proposals Map Booklet). This does not, in our opinion, reflect a formal and robust assessment of the qualities of the landscape concerned as required by government advice. Should the Council wish to proceed with the inclusion of a gaps policy, it is considered that greater consideration is needed to the designation of these gaps, through robust assessment.

2.2.4 Particular concern is raised regarding the “gap” between Emsworth and Havant and whether its current designation will effectively achieve any purpose. The “gap” between Emsworth and Havant varies significantly in size and character with the narrowest point located to the north of Emsworth. It is also split by the A27. Emsworth is constrained by the A27 and Westbourne to the north and by Hermitage to the east. The “gap” between Emsworth and Havant is larger than those between Emsworth and the other settlements thereby making it the least significant to be protected in any event. The Council’s report ‘The Formation of Strategic and Local Gaps in Havant Borough’ 2008 states in its recommended approach that *‘certain parts of the open land are at lower risk of being under development pressure. If they are part of a more extensive area of potential gap they may not be essential to maintaining a gap.’*



- 2.2.5 It is therefore felt that careful consideration should be given to the designation of this “gap” particularly to the south of Havant Road, and to the west of Emsworth, which is considered to be the only reasonable option for new development in the town in terms of landscape considerations. This part of the “gap” extends no further than the existing development in the north of the town. The three field parcels to the south of Havant Road, to the west of Emsworth, have western boundaries which strongly enclose them from views from the west. The lines of mature trees and scrub form a robust barrier. It would therefore not have a significant impact on how the “gap” is perceived, should the principle of gaps be retained, if these three field parcels were not included in the “gap”.
- 2.2.6 A further recommendation of the Council’s study is that gaps ‘must be bounded by permanent defensible features.’ In the case of the Emsworth-Havant “gap” this is the case along the majority of its eastern boundary with both the B2148 and the A27 contributing to this boundary. The southern part of the “gap” does not have any significant feature which would provide this defensible boundary and it is considered that a sensitively designed development could enable a more suitable boundary to be created. This would help to prevent further encroachment into the gap and could soften the boundary between the development and the countryside found in the “gap” thereby improving its visual appearance.
- 2.2.7 The subtext of the policy states that *‘the land that has a gap function will be identified in the Development Delivery (Allocations) Plan in order that it coincides with any necessary urban extensions.’* It is felt that this is needed to be further highlighted so as to make clear that not all land between the settlements will automatically become part of the “gap”. An approach which merely identifies those areas of land which are key in maintaining the gaps is considered to be more suitable.
- 2.2.8 In summary, it is our view that Clause 9 of Policy CS10 should be deleted. In turn therefore the designation of gaps should be deleted from the proposals maps. We further consider that, as this is a Core Strategy, the level of detail provided by the proposals maps is inappropriate for this strategic document, and effectively repeats the level of information contained in an old-style local plan proposals map. In line with other Core Strategies, it should only be necessary to include a Key Diagram.



2.2.9 If however it is considered appropriate, notwithstanding our comments above, to maintain the principle of strategic gaps, a more detailed, and robust, assessment should be made of the boundaries. This should include, in our opinion, the deletion of that part of the gap to the west of Emsworth and south of Havant Road.

***Boyer Planning Ltd***  
***August 2010***

