

HAVANT BOROUGH COUNCIL



SUBMISSION CORE STRATEGY

**PUBLIC EXAMINATION
HEARING SESSION 1
7 SEPTEMBER 2010**

STATEMENT 1 – including additional questions

- a Spatial Vision**
- b Sustainable Development**
- c Social Cohesion**

Core Strategy Justification

a Spatial Vision

Question 1

Does the Havant Borough Core Strategy present a clear spatial vision for the borough, recognising its distinct qualities?

Overall Council Response

1. The council believes that the Havant Borough Core Strategy (HBCS) presents a clear spatial vision for the borough that pays particular attention to recognising the distinct characteristics of the borough.
2. The borough is split into five distinct areas. For each area a succinct profile has been produced giving a general description, comments on the population, economy, other characteristics, challenges and opportunities and how the Core Strategy seeks to address them. These succinct overviews are easily accessible and lead into the overall vision. By their nature the area profiles do not go into great detail, much of which is covered in other council or locally produced documents which are signposted throughout the core strategy.
3. The creation of a vision that is succinct, easily readable and specific to the borough can be difficult and could lead to generic statements. This has been a criticism of some core strategies. The corporate vision (Havant Corporate Strategy SC09/33) headline of 'working towards a cleaner, safer, more prosperous borough' is very succinct although similar to some other councils. The vision in the Havant Local Strategic Partnership's sustainable community strategy 'Forward Together' (Core Document SD09/33) is confirmed in paragraph 1.37 of the submitted Core Strategy.
4. Care has been taken to bring together all these strands of local vision to produce a core strategy vision that builds on the characteristics of the five distinct areas of the borough to create a relatively succinct and borough specific vision on page 25 of the submitted Core Strategy. The vision sets out what the whole Core Strategy seeks to achieve, whilst the policies are the implementation tool for the vision.
5. Within the vision there are clear borough specific spatial statements, such as the Solent coastline (including Hayling Islands association with windsurfing), the impact of the Hindhead Tunnel, the Partnership for Urban South Hampshire (PUSH), adapting to climate change, the challenges of increasing skills levels, the benefits of the Public Service Village and the impact of the West of Waterlooville Major Development Area (MDA). These references are specific and distinct to the borough. Most importantly, the objectives and policies that support the achievement of the vision demonstrate the spatial nature of the Core Strategy.
6. Objection has been raised that the vision could be 'anywhere' and it is lacking as a guide to 'place making', provides no guidance for the delivery of the vision, policies contradict the vision, the Core Strategy is too long and is not a management tool. That the area profiles lack detail on the MDA, development opportunities in Emsworth, the need to protect environmentally sensitive historic areas such as old Bedhampton and does not explain why Hayling Island is not suitable for a larger

share of housing and employment growth.

7. The council believes that it has produced a spatially relevant vision of what it is intended that the Core Strategy will help deliver as the future shape of the borough. The HBCS should be read as a whole and the merits of policies relative to each other balanced in terms of the merits of the particular case being assessed. The inclusion of the development management policies complement the strategic policies and provide the users of the plan, be it developers, development management officers or the local community clear guidance on how a planning application will be determined. The area profiles are not meant to replicate the detail found elsewhere in the plan but give a simple and accessible picture of the five areas.
8. A significant effort has been put into minimising length of the HBCS. Signposting of evidence and related documentation has been used extensively and whilst the HBCS exceeds the 50 page guideline it remains succinct. Brevity also has to be balanced against the objectors who want more and more detail regarding their own sphere of interest. A large number of respondents have made objections to promote their own development sites or object to development sites that they disagree with. These site specifics will largely be dealt with in the Development Delivery (Allocations) Plan. Strategic Sites were identified in terms of their strategic qualities not on an area basis.

b Sustainable Development

Question 2

Is the Havant Borough Core Strategy (HBCS) broadly compliant with national policy? Will the HBCS deliver sustainable development?

9. The council believes that the Havant Borough Core Strategy (HBCS) is broadly compliant with national policy and will deliver sustainable development. HBCS was written to comply with national policy in place prior to publication in March 2010. New planning policy statements have been published since the publication of the HBCS. The new policy statements are PPS1 Supplement: Planning for a Low Carbon Future - Consultation Document; a consultation PPS on Planning for a Natural and Healthy Environment; PPS5: Planning for the Historic Environment (23 March 2010); PPS25: March 2010 Review; PPS25 Supplement: Development and Coastal Change and PPS3: Housing (June 2010). An analysis of the impact of these new national policy statements is set out at Appendix 1 – PPS Update Implications.
10. Since the submission of the HBCS, the new coalition government has revoked the regional spatial strategy, the South East Plan (SEP). This change in government policy has some impact on the HBCS; however, an initial analysis of this is that the majority of the issues in the SEP are covered in existing national policy. The only areas where further policy may be required are in terms of the former SEP Policy C3 on the AONB and the determination of the right level of provision for gypsy and traveller and travelling showpeople sites. These are issues that are dealt with in Session 3 (Statement 3) and later in this statement respectively.
11. The HBCS puts sustainable development at its heart. Extensive community involvement in accordance with the adopted Statement of Community Involvement has gone into the HBCS creation, with six separate community engagement periods

where the alternative development options have been discussed at great length. These events and their outcomes are detailed in the council's Statement of Consultation (SD06/06). The HBCS has been closely aligned with the work on the Havant Sustainable Community Strategy–Forward Together (SD09/30). The HBCS vision sets out what a sustainable borough will look like in 2026. All the policies of the HBCS must be seen as a whole and together they aim to ensure that all new development will be sustainable.

12. The HBCS will deliver sustainable communities because the borough is physically compact, there is good accessibility by car, bus, and rail into and out of the borough; good buses and walking within the borough, (albeit a need for some improvement to cycling); a good range and spread of existing facilities that have capacity. The policies of the HBCS work together for sustainability and the new development is locationally planned to maximise the effectiveness of this.

Questions 3

Does the HBCS address cross boundary issues, including transportation, effectively?

13. Administrative boundaries mean little to how most people live their lives. Havant Borough Council (HBC) covers a defined administrative area and as a relatively small borough has recognised the benefits of partnership and cross boundary working in order to maximise the effective use of resources. The council takes a leading role in PUSH, leading the sustainable development work stream at chief executive and director level. The council has led the work on the Strategic Flood Risk Assessment and has been involved in all the various sub-regional evidence base studies e.g. Harbour Authority Transport Impact Study. For some time the council has been working with Winchester City Council on a joint approach to bringing forward the cross boundary development at West of Waterlooville Major Development Area (MDA). We continue working with Chichester on the Shoreline Management Plan; whilst the Chichester Harbour AONB involves cross borough work. The most recent example of cross borough working is the current sharing of a Chief Executive with East Hampshire DC and a joint management team structure across both authorities to be operational in October 2010..
14. There are inevitably issues with increased joint/cross boundary working as different organisations have different timescales and programmes. As the HBCS is the most advanced core strategy in the area, the alignment of our work with Winchester, East Hampshire and Chichester councils remains an ongoing challenge. However, we have a sound relationship that will continue to develop positively to overcome areas of mutual concern.
15. Transport is a major area of cross boundary work. Hampshire County Council (HCC) is the Highway Authority, working with Transport for South Hampshire (TfSH). HBC has an agency agreement to deal with smaller planning applications but no strategic policy resource. The council started working with Portsmouth City Council in 2007 to develop a cross boundary transport evidence base. This quickly expanded to include Gosport, Fareham and Hampshire County Councils. The Highways Agency was also involved from the start. Gosport had the resource to lead the work and Peter Brett Associates were commissioned to produce the Transport Impact Evaluation (SD09/27) using the best transport data available. As the four planning authorities

were at different stages in the LDF process, with Gosport and Fareham having specific issues with the Strategic Development Area and HBC needing to produce a mitigation report for the HBCS (SD09/28) the formal partnership ceased. Nevertheless, HCC pulls everything together, ensuring consistency and sharing of evidence. HBC is directly involved with HCC/TfSH in developing the Bus Rapid Transit (BRT) proposals and in data provision for the updating of the overall county traffic model. Therefore the objection by the Highways Agency that HBC is not directly involved in the latest evidence studies is not correct and HBC's intra and inter borough transport evidence remains sound.

Question 3a. What is the latest position with regard to the Highway Agency's objection?

16. Discussions have taken place with the Highways Agency regarding a way forward. Having. Additional text is proposed at paragraph 9.21 to confirm that a Sustainable Transport Strategy (STS) will be integrated with the Development Delivery (Allocations) Plan. Hampshire CC the highways authority has confirmed that they are happy with the PBA Study evidence base and the principle of integrating the STS with the Development Delivery (Allocations) Plan. (Copy of letter attached at Appendix 2.). The Highways Agency continue to have some concerns about the PBA study and the level of detailed mitigation that should be available for the strategic sites. A resolution continues to be sought and the help of the HA and HCC is appreciated on this matter.

Question 3b. Should land for a transportation hub be safeguarded at Forty Acre Farm?

17. The land is currently not within the urban area of the borough and is covered by gap policy. It is land that is under no development pressure. The objector has put forward an outline of an idea that the site could be developed for a wide range of uses, including use as a transport hub associated with commercial development. On the face of it this has potential, however, no detailed work has been produced by the objector. The site is accessed by road from the A2030 and the A3(m) junction 5. The section of rail track that could be accessed from the site is understood to be in a signalling block that has no additional capacity, without major investment. That limited capacity is currently taken by the stations at Bedhamton and Havant. The rail useage for the local stations is shown in Table 1. The introduction of a new parkway station would require significant investment and patronage to sustain it. Bedhamton station would most likely close, patronage of Havant station could reduce and it may have an adverse impact on the rail useage from the Havant - Brighton-Victoria line, as users between Havant and Chichester could commute to the parkway to use the quicker Waterloo service to London. No analysis of these potential impact has been undertaken by the objector.

Table 1 - Rail Station Statistics for Havant Borough Stations

Including selected other local stations

Figures are for total passenger movements (entries, exits and interchanges)

	2005/6	2006/7	2007/8	2008/9
Bedhampton	98,761	101,576	119,484	113,680

Emsworth	266,643	285,966	318,992	352,128
Havant	2,132,709	2,132,055	2,281,751	2,456,619
Warblington	43,011	43,830	51,283	45,472
<i>Total for Borough</i>	2,541,124	2,563,427	2,771,510	2,967,899
Chichester	2,408,799	2,612,948	2,777,190	2,906,370
Fareham	1,432,408	1,471,193	1,532,150	1,603,899
Portsea Island stations*	5,674,376	5,318,839	5,570,116	6,259,758
Cosham	682,199	663,817	668,777	810,544
Southampton Central	5,456,921	5,782,880	6,120,834	6,511,288
Southampton Airport Parkway	1,190,000	1,421,000	1,322,000	1,404,000

* - this covers Hilsea, Fratton, Portsmouth & Southsea and Portsmouth Harbour

18. Forty Acres may have more potential in terms of a bus based hub, particularly if linked into the plans for the cross borough Bus Rapid Transit (BRT) network. However, the initial draft feasibility work undertaken by Mott Gifford for HCC has not taken this into account and this would need to be assessed. The access to the site is primarily from Junction 5 of the A3(M) this junction is due to be improved with signalisation as there can be peak congestion. The impact of the proposal has not been modelled in any form and therefore a precautionary approach should be taken at such a sensitive strategic road network junction.
19. The transport hub proposal is part of a much more significant proposal that links this site with the potential commercial development at Brockhampton West. Insufficient research has been carried out on the impacts of these proposals on the transport network, the sensitive environment or the social framework of the area. Whilst the sites may have some development potential more work is required to understand whether the sites are sustainable. If the sites are sustainable then they can come forward through the Development Delivery (Allocations) Plan. This DPD will incorporate a sustainable transport strategy, in accordance with the agreement with the Highways Agency, therefore it will be most appropriate to consider bringing the transport hub forward through that plan which will be subject to full scrutiny. Until then it would be dangerous to commit to safeguard a site, which is under no development pressure, for a use which has not been proven as sustainable.

Question 4

Does the HBCS address issues of climate change satisfactorily?

20. The borough's location on the south coast, in an area of water stress, in the area projected to be the most affected by the extremes of climate change in the UK Climate Impact Projections 2009 (UKCIP09 http://www.ukcip.org.uk/index.php?option=com_content&task=view&id=254&Itemid=287) means that climate change has been a critical issue for the HBCS. The borough must adapt to these predicted climate changes as well as mitigating the impacts. The council takes its responsibility to climate change very seriously. Risk assessment and monitoring of National Indicator 188: Planning to adapt to climate change is ongoing and actions being taken including the council recently signing the

Nottingham Declaration.

21. The importance of the HBCS in addressing climate change is corporately recognised; as such the council has led on the PUSH Strategic Flood Risk Assessment (SD01/12). This has been an important tool in the HBLDF. The climate change maps that predict the flood zones in 2115 have been used as the basis for potential development decisions. No potential sites in the SHLAA have been identified in flood zone 2 or 3 in 2115. Flood erosion is also an issue and this has been part of the decision away from coastal location developments (together with the nature conservation constraints). Council officers have taken a lead at the PUSH level developing the sustainability policy framework: <http://www.push.gov.uk/work/sustainability-and-social-infrastructure.htm> . This work has been taken forward into the HBCS in Policy CS12, which seeks the application of the sustainable construction targets ahead of the national timeframe. The application of this policy position on construction methods and water reduction is justified because Havant is part of the Solent coastal plain, the area most vulnerable to the impacts of climate change.

Question 4a What is the local justification for the requirement of policy CS12?

22. As stated under question 4 the borough's location on the south coast puts it in the most vulnerable area in the United Kingdom to the impact to climate change. Whilst the whole PUSH area is vulnerable to climate change, Havant has around 48 km of coastline, much of which is less well protected than the rest of the sub region and/or lower lying, therefore Havant as part of PUSH has taken a lead on climate change, particularly in the development of the Sustainability Common Policy framework on which Policy CS12 is based. The overall justification for this position is set out in pages 16 – 26 of the PUSH Sustainability Guidance – Introduction (March 2009) <http://www.push.gov.uk/work/sustainability-and-social-infrastructure/sustainability-policy-framework.htm> . This overview remains sound. The national climate change data has been updated since the PUSH Sustainability guidance was published, with the UKCIP09 data (June 2009)(See link above). This data gives finer mapping detail of the projected impacts and continues to identify the PUSH sub region, including Havant as one of the most affected in the UK. In terms of Water Stress, whilst Havant is the home of Portsmouth Water Company's Bedhamton Springs, the average water use in this area is the third highest nationally at over 160 litres per day. This is put down to the affluence of the area and the higher temperature. This is referenced in the Environment Agency Water Resource Strategy (Action plan for Southern Region) (December 2009) (see <http://www.environment-agency.gov.uk/research/library/publications/40731.aspx>). PUSH and particularly Havant are more sensitive to climate changes because of the following main issues:

- The South Hampshire sub-region is predicted to be in the zone of the UK most affected by drier summers.
- The sub region is already recognised as being an area of serious water stress.
- Hotter drier summers will make many natural environments much more susceptible to fire damage
- Hotter drier summers will increase the energy demand for cooling.
- South Hampshire is again in one of the areas of the UK worst affected by the expected increase in winter precipitation.

- Heavier winter precipitation will lead to greater river flooding and localised flash flooding as well as accelerated coastal erosion.
- Global sea level is expected to continue to rise and by 2100 it could have risen by as much as 94 cm (DEFRA) around the South Hampshire coast, depending on the emissions scenario and assuming another 5-8 cm contribution from the post glacial tilting effect.
- The borough's low lying coastal landscape is most susceptible to the impacts of climate change through rising sea levels and increasing frequency of storm events.
- The need to protect Portsmouth from rising sea level is likely to have a coastal squeeze impact on the borough's shoreline.
- The natural and built heritage of the sub region is key to the quality of life and ultimately the economic success. Havant has a rich variety of natural and built heritage. The new development must adapt to climate change and mitigate its impacts otherwise the natural and built heritage could be undermined.

The Conclusion of the PUSH Guidance states ‘

Climate change is already being experienced in South Hampshire and global greenhouse emissions are predicted to increase the rapidity. South Hampshire's important and sensitive **sites of biodiversity and landscape value** will be under pressure from an increasing population. The **development growth** proposed in South Hampshire over the next 20 years is inevitable (despite the recent downturn). As a priority the new development should be planned to adapt to the consequences of climate change. Environmentally this growth can be viewed negatively or in a pragmatic way that the development industry must be address positively. The unique pressures facing south Hampshire make the case for **heightened sustainable development standards**. This new development is of such significance to the future of the sub region that it must be built to higher standards of sustainable design. Insisting on certain minimum standards of sustainable design helps to **mitigate** the contribution to global warming and the other environmental costs that the development causes in its construction and by the future residents, visitors and employees. It also helps to mitigate the **local environmental impact** of the development in South Hampshire.

23. The Inspectors at both the New Forest DC and Southampton CC Core Strategy examinations accepted this justification for the inclusion of the PUSH Sustainability Policy Framework principles of accelerating the targets for achievement of zero carbon homes in 2016. The [Inspector at the New Forest](#) stated ‘Policy CS4 seeks, in some regards, to advance national policy on sustainable construction. Policy CC4 of the South East Plan requires that local circumstances be clearly demonstrated to justify such a departure. In the present case, the proposed standards are based upon principles set out in the PUSH Sustainability Policy Framework – which itself aims to provide a consistent basis for development within the sub-region. On balance, I consider that this provides adequate justification for the policy approach now proposed’. At [Southampton the Inspector](#) was impressed with the leading role the city takes on climate change with its combined heat and power facility and supported the policy principle. Havant is seeking to incorporate a renewable energy plant in the Public Service Village and has done some initial work on CHP for the Havant Town centre. The acceleration of the code for sustainable homes proposed in Policy CS12 is wholly appropriate in ensuring that new development in the

borough will minimise its impact on climate change affecting the borough, with its 48km of coastline and multitude of sensitive habitat designations.

c Social Cohesion

Question 5

Will the HBCS provide effectively for inclusive communities?

24. Inclusive communities are fundamental to sustainable communities. As a spatial plan, the HBCS seeks to join up with the plans of agencies and organisations providing social and other services to all kinds of people and their communities. The Havant Local Strategic Partnership and the alignment of the HBCS with 'Forward Together' provide the mechanism to provide a more effective means of delivering inclusive communities. The HBCS is the product of extensive community engagement, which has sought to include a wide range of people. It is recognised that many people have found it difficult to engage in strategic policy work and tend to only be concerned about their immediate area of interest.
25. The HBCS gives particular focus to the physical regeneration of the borough as a means of creating more inclusive communities. The social profile of the borough is one of contrasts; relatively wealthy areas and poorer areas, sometimes physically next to each other. Policy CS6 seeks the physical regeneration of key areas that will deliver greater inclusiveness, whilst CS7 identifies the local poor educational theme and older and vulnerable groups of local people who need support. Policies CS6 and CS7 must be seen in conjunction with CS10, which protects the environmental assets, CS8 and CS14 seeking safe and well designed environments and CS19 that can deliver supporting resources. The HBCS policies must be seen as a whole and as such social benefits and inclusiveness are effectively addressed. The HBCS has been the subject of an Equalities Impact Assessment, this shows that equalities have been addressed in the production of the HBCS.

Question 6

Will the needs of Gypsies, Travellers and Travelling Showpeople be met satisfactorily, in accordance with government guidance?

26. Current government guidance in relation to the needs of gypsies, travellers and travelling Showpeople is contained within various pieces of legislation and guidance including:
Section 225 Housing Act 2004
Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites
Circular 04/2007 Planning for Travelling Showpeople
Hampshire and Isle of Wight Gypsy and Traveller Accommodation Assessment 2006
Hampshire and Isle of Wight Travelling Show People Accommodation Assessment 2008.
27. More recently there have been several announcements by the Government on the changes that will be made to this guidance including the further guidance offered by Steve Quartermain the government's Chief Planner on 6 July (Core Document SD11/20a):
"14. How do we determine the level of provision for travellers' sites?"

Local councils are best placed to assess the needs of travellers. The abolition of Regional Strategies means that local authorities will be responsible for determining the right level of site provision, reflecting local need and historic demand and for bringing forward land in DPDs. They should continue to do this in line with current policy. Gypsy and Traveller Accommodation Assessments (GTAAAs) have been undertaken by all local authorities and if local authorities decide to review the levels of provision these assessments will form a good starting point. However, local authorities are not bound by them. We will review relevant regulations and guidance on this matter in due course."

28. Further to this there was a further announcement on the Communities website on 30 July that stated that they would be replacing Planning Circular 01/2006 Planning for Gypsy and Traveller sites with "New light touch guidance" whilst at the same time "encouraging local authorities to provide, in consultation with the local community, an appropriate number of traveller sites that reflect local and historic demand."
(see <http://www.communities.gov.uk/planningandbuilding/travellers/>)
29. The Core Strategy makes reference to the provision of accommodation for gypsies and travellers in Policy CS9 Housing where it states under the list of criteria that sites for housing will have to comply with:
"9 Ensure suitable provision and protection of sites for Gypsies, Travellers and Travelling Showpeople."
30. Prior to the revocation of the South East Plan a single issue partial review was undertaken that dealt with the issue of provision of accommodation for gypsies and travellers and travelling show people. A public consultation took place in autumn 2008 by the then South East Regional Assembly (SEERA) on options for the allocation of new Gypsy and traveller accommodation. An Examination In Public was held in February 2010 and subsequently the Inspector's report was due to be published around April 1 2010. This has yet to be published and there is a great deal of uncertainty as to whether it will ever be published. HBC will continue to work within a sub regional group in consultation and partnership with other local authorities surrounding the district in South Hampshire.
31. It should be noted that the options that were considered as part of the Partial Review of the South East Plan could have resulted in a maximum level of provision of 5 residential pitches, represented by Option D, although Option A allowed for 2 pitches and Option C allowed for 3 pitches.
32. It is proposed as part of the process of developing the Development Delivery (Allocations) Plan that a thorough consultation exercise is carried out with the travelling as well as the settled community to determine provision on a local basis in line with recent and emerging government guidance. This means of determining the level of provision will be inline with Circulars 01/2006 and 04/2007 concerned with Planning for Gypsy and Traveller Caravan Sites and Planning for Travelling Showpeople until such time as this guidance is superseded. As emerging guidance is pointing planning authorities towards GTAAAs as a starting point it should be noted that the need for additional pitches for Gypsies and Travellers and plots for Travelling Showpeople is identified in the Hampshire and Isle of Wight Gypsy and Traveller Accommodation Assessment (2006) and the Travelling Showpeople Accommodation Assessment (2008) for the same area.

33. In the light of the changes and further proposed changes to come it is proposed that an additional criterion based policy dealing with the specific issue of the needs of gypsies, travellers and travelling show people be included in the HBCS to ensure that the needs are properly met. This is also required as a result of the revocation of the Regional Spatial Strategy for the South East, The South East Plan which occurred on 6 July.

6a. What are the implications for the CS of the government's revocation of the SEP and intended cancellation of Circular 1/2006?

33. This is referenced in paragraph 28 above and can be discussed further at the examination.

6b. How will criterion 9 of Policy CS9 be developed?

34. It is proposed to delete the criterion in the schedule of change number 53 and rely on the proposed new criteria based policy shown in change number 6.