

# Draft Havant Borough Local Plan 2036

## Consultation responses and the proposed way forward

### **Purpose of the report**

1. The purpose of this report is to provide an overview of the response that were received to the consultation on the Draft Havant Borough Local Plan 2036 and to set out the Council's proposed way forward.
2. This report has been prepared and informally considered by members. It has not been subject to formal Cabinet or Council approval. It should be clarified that the responses will still need to be formally considered as part of the Cabinet and Council consideration of the Local Plan. This provides the necessary open and public discussion and the opportunity for deputations from stakeholders on how the consultation comments have been taken forward. Nonetheless, informally considering the responses provides officers with the necessary clarity to keep moving forward with the Local Plan and make the necessary changes.

### **The journey to this point**

3. The Council has been preparing a new Local Plan, the Havant Borough Local Plan 2036, since early 2016.
4. The first stage in the preparation of the new Local Plan was the preparation and subsequent adoption of the Local Plan Housing Statement. This was consulted on in the summer of 2016 and adopted by the Council that December. The next significant milestone in the plan's preparation took place at the start of 2018 with the consultation on the Draft Havant Borough Local Plan 2036.
5. The Council has taken a positive approach to the future development of the Borough and the Draft Local Plan reflects that vision: meeting the need for development in a way that will boost economic growth and making sure that the Borough is an attractive place to live work and invest. Nonetheless, it is important to fully consider all three arms of sustainable development and make sure that in meeting the need for development, this does not happen in such a way that detracts from Havant as a place to live or the quality of the Borough's important natural and historic environment.

### **The consultation on the Draft Local Plan**

6. Consultation on the Draft Havant Borough Local Plan 2036 took place from 8<sup>th</sup> January to 16<sup>th</sup> February 2018. The Council engaged widely using a variety of different methods over and above the minimum consultation requirements within budgetary constraints, in accordance with its commitments in the [Statement of Community Involvement](#):
  - **Council website** - The Local Plan page on the Council's website was regularly updated in advance of, during and following the close of the consultation with a copy of the consultation document, and supporting material including evidence base documents were clearly signposted. The Local Plan

page also provided clear instructions on how to respond to the consultation via the online survey, email and post.

- **Leaflets and booklets** - The Council produced a series of informative content, available online and in printed form at the exhibitions to help residents to learn about what the Draft Local Plan says and how to engage in the consultation:
    - *Draft Local Plan Consultation* - a folded leaflet giving a brief overview of the key priorities of the Draft Local Plan and encouraging residents to contribute to the consultation. These were handed out at exhibitions and included details of where all the information could be found so that word could spread about the consultation
    - *Where Next for the Environment* - setting out how the Local Plan aims to protect and enhance the environment
    - *Where Next for Commerce and Town Centres* - setting out the bold vision for the future of the Borough's town centres, employment areas and for Hayling Island seafront
    - *Where Next for Housing* - setting out the Draft Local Plan's approach to housing across the Borough
    - *Where Next for Infrastructure* - setting out how the Council is working with infrastructure providers to accommodate economic growth and development whilst also improving the Borough's infrastructure networks
  - **Exhibition/Displays** - Residents were invited to attend nine exhibitions throughout the borough. A series of banners were on display with Council officers on hand to listen to concerns and answer questions from members of the public. Hard copies of the consultation material, and the evidence base documents were also available to view.
  - **Social Media** - Promotion on the Council's own accounts. There was also a Facebook campaign to promote the consultation on the Draft Local Plan, including posts encouraging residents to attend public exhibitions being held across the borough during the consultation period.
  - **Mailout** - the Council keeps a mailing list of those who have asked to be kept up to date on the Local Plan. An email or letter was sent to everyone on that mailing list.
  - **Site notices** - At least two site notices were put up for each of the proposed development sites in the Draft Local Plan. These highlighted that the site was proposed for development (and included a site plan), links to the consultation material and details of the dates, times and locations of the public exhibitions.
  - **Press Release(s) and briefing** - These were issued in the run up to the Cabinet meeting in December 2017 and at the start of the consultation.
  - **Community Networks/Forums** - Council officers attended and presented the proposals at a number of different community and resident association meetings and were available for questions following this.
7. The Council wishes to thank those residents' groups, interested parties and individuals who helped to spread the word about the consultation and encourage people to come to the exhibitions and find out more about what the Draft Local Plan proposes.
8. The exhibitions (figure 1) were very well attended, showing the enthusiasm and interest in the Local Plan amongst the Borough's residents.
9. The Local Plan webpage ([www.havant.gov.uk/localplan](http://www.havant.gov.uk/localplan)) was viewed a total of 12,895 times during the consultation period with a peak of 850 views on 9<sup>th</sup> January. This was the most viewed page on the Council's website after bin collections (potentially due to the Christmas collection dates running into January).
10. The Facebook promotion was displayed on 58,030 Facebook accounts generating 198,211 impressions (the number of times it appeared on a newsfeed). Of those who engaged on Facebook (a 'like',

comment or click through to the website), the most popular age bracket for women was 45-54 and for men it was 25-34. This generated 5,675 clicks through to the Local Plan webpage.



**Figure 1: Stride Centre exhibition**

11. The email bulletin was sent out to 2,804 people and was delivered to 2,792. A total of 1,421 recipients (51%) opened the email and 327 (12%) then clicked on a link to further information on the consultation directly from the email. This is not as strong an open and click rate as was hoped for, although it is the first time that email communication has been monitored in this way. In the future, further reminder emails will be sent to try and boost the overall response through email.

### **Consultation comments received**

12. Through the consultation, stakeholders were encouraged to use an online survey to respond to the consultation. This was designed to focus thoughts on what specific policies or sites there were concerns with and what changes should be made. Submissions by letter and email were also accepted. In order to process the content of the letters and emails, these were manually added to the questionnaire to create one dataset of responses. The 'specific consultation bodies' in the regulations (these are set out in the Statement of Community Involvement) have been kept separate and will be published separately.

13. A total of 505 individual responses were received to the consultation providing comments across 111 different policies, topics and questions. This is lower than the number who responded to the Local Plan Housing Statement, although the comments were generally more substantive in nature. The spatial distribution of where people responded from is shown in figure 2, highlighting that there are areas of the Borough from which proportionally far more responses are received. It should be noted though that the key consideration is what people have said, not how many have said it.

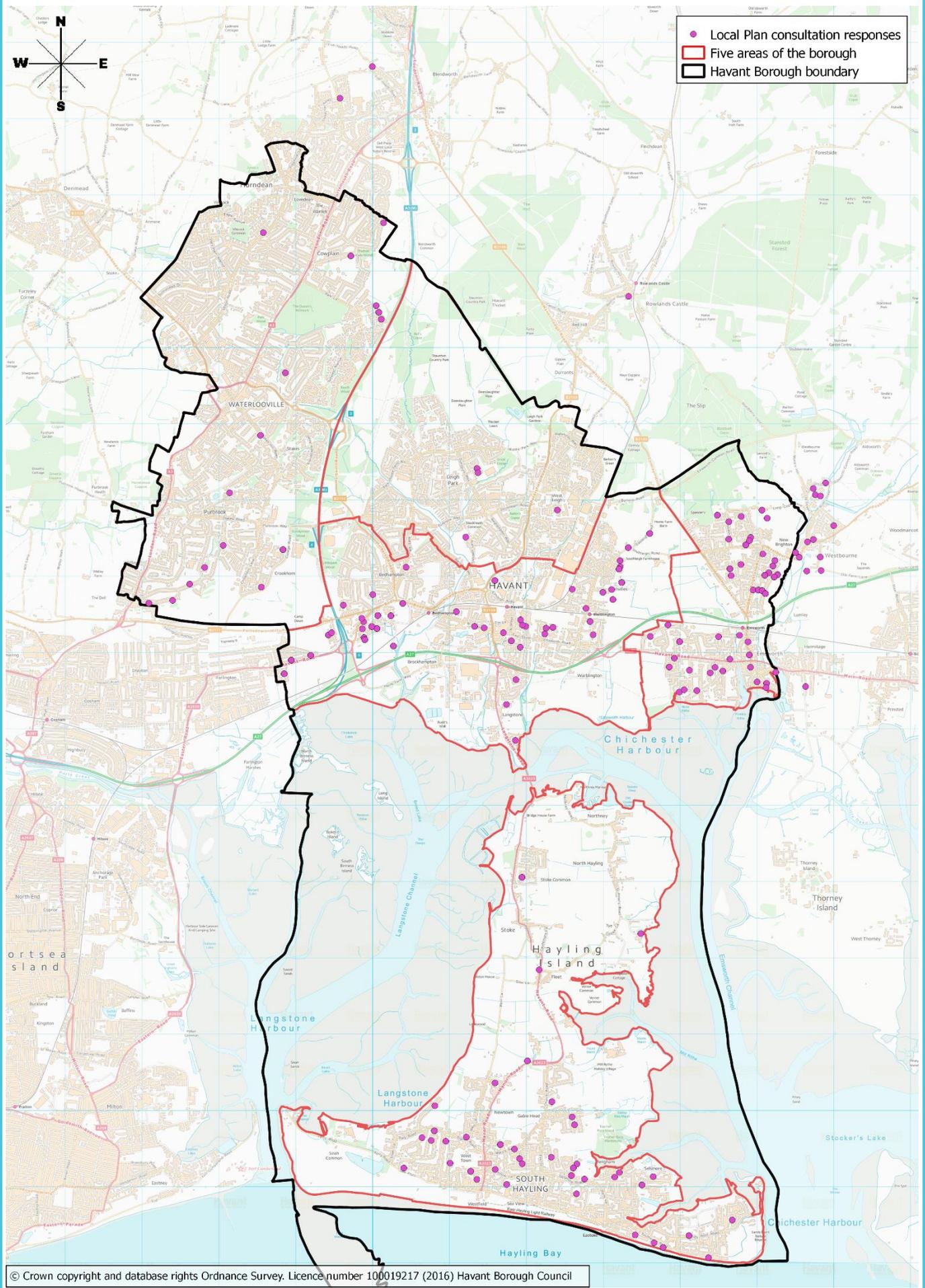
14. Two petitions were received through the consultation. These are treated as consultation responses.

15. The first petition is titled "Petition to Havant Borough council regarding the removal of Site H22 (UE30) in the Borough Council's Housing Statement 2036". This petition has 1,785 signatures. The petition sets out "We, the undersigned, petition Havant Borough Council to remove site H22 (UE30, Land south of Lower Road) from any future consideration as a housing in their Local Plan 2036 for one, some or all of the following overriding reasons:

- The damage it will cause to the historic and landscape setting of the Old Bedhampton Conservation Area
- The irritable harm it will cause to the ancient heritage of this part of the Borough
- The detrimental change that development will bring to the amenity and character of the area
- The added dangers that will arise on the blind corners and shared roadway of Lower Road and at the mini roundabout junction on Bedhampton Road as a result of the significant additional traffic using the bends and making right turns into Brookside Road
- The failure to comply with government guidance and the core principle of protecting heritage assets contained in paragraph 132 of the National Planning policy Framework and Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- The ability to provide 50 houses on other less sensitive sites
- The precedent that would be set for future further development in this area
- Any public good that might be generated would not outweigh the harm and danger that would arise from development.

16. The second petition is titled "Full infrastructure review in area of 40 Acre Farm prior to planning submissions". It has 3,458 signatures. The petition sets out "We the undersigned feel strongly that Any planning permission on 40 Acre farm should be halted until the Local Plan 2036 submission to Government That the development process should be halted until a full site and surrounding infrastructure review ,with all applicable bodies, be carried out in line with Schedule 4 of T&C planning That all development should be halted until the publication of the NSSMP Priority Action No.2 & No.3 with regards to the site being identified as High suitability for Brent geese and Waders in a previous Havant Council survey. That all development consultations be halted until the developers claims of school catchment areas have been verified and safe access to catchment schools for children on foot assured. That full post-construction costings of maintenance, health and Safety issues of the proposed SuDS are identified, analysed and reported. That any other points brought up during public consultations or private correspondence be minuted and made available for public discussion prior to any planning decision being made." It should be noted that the text above, which was submitted to the Council, is slightly different to the original change.org petition, though addresses most of the same points. The original petition is at <https://www.change.org/p/havant-borough-council-full-infrastructure-review-in-area-of-40-acre-farm-prior-to-planning-submissions>.

Figure 2: consultation responses received



## **Summaries of the consultation responses**

17. Officers have read and considered each and every consultation response that has been received via the online survey, email and post. These have then been summarised to give an overview of the issues and considerations that were raised on each policy to inform a discussion as to how the Council should proceed. The number of comments submitted for each policy or topic is also highlighted to give a broad indication of the amount of people who have responded on that policy<sup>1</sup>.
18. It is necessary to provide a summary of the key comments raised as opposed to simply presenting the original representations. If all of the original comments were put forward then, for some policies, readers could understandably struggle to extract the salient points and key messages given the amount of responses that the Council have received. In order to make sure that the key messages are clear, and a discussion can take place regarding changes to each of the policy areas, a great deal of summarising has been necessary. The Council will publish copies of the original responses from specific (statutory) consultation bodies, which includes Government agencies and neighbouring local authorities.
19. The proposed approach moving forward for policy is set out consistently:
- i. Establishing whether there are any comments made which necessitate a reconsideration of the principle of whether the site would constitute sustainable development or a fundamental review of the policy or whether substantial changes are likely to be needed to a topic based policy;
  - ii. What matters should be considered further following the comments that have been received; and
  - iii. The justification why, for some comments, a change is not necessary or appropriate.
20. It should be noted that this report does not set out precisely what changes would be made. It does however importantly set out what matters need further consideration to create the Pre-Submission Havant Borough Local Plan 2036. The summaries also indicate what matters do not require further consideration and why. In preparing the Pre-Submission Havant Borough Local Plan 2036, officers will consider carefully those specific matters and engage further with Members as appropriate. Cabinet and Council will then need to formally decide how to proceed based on the recommendations of officers.

## **Key changes being considered**

21. For almost all of the policies, some changes are being considered. However for some, the principle of including the policy or site needs to be given further consideration. These are:

- H10 - Land at Westwood Close
- H22 - Land South of Lower Road
- H30 - Northney and Sparkes Marinas

22. There are also a number of proposed new sites for development that have been submitted. These are:

- |                                       |                                 |
|---------------------------------------|---------------------------------|
| ▪ Hayling Island College Sports Field | ▪ Rook Farm                     |
| ▪ Southmere Field, Langstone          | ▪ Mengham Estate                |
| ▪ Brockhampton West                   | ▪ Land south of Long Copse Lane |
| ▪ Hazelton Wood                       | ▪ Land south of Havant Road     |
| ▪ Land at Hulbert Road                | ▪ Land North of Oysters         |

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<sup>1</sup> Please note that these figures should be considered approximate as they do not include statutory consultees or any comments that were made erroneously in the box for a different policy.

23. Maps of the proposed new sites for development are provided as Appendix 1 of the consultation response tables. These sites will need to be screened for constraints<sup>2</sup> and subject to regulatory assessments<sup>3</sup> in order to establish whether they would constitute sustainable development.
24. In the Draft Local Plan, the Council also committed to undertaking further consultation regarding the potential development of Langstone Technology Park. As such, this key site for the future of the Borough's economy will be included in the pre-submission consultation.

### **Evidence base**

25. The Draft Local Plan was based on an extensive evidence base. However, that evidence base was not complete. The following studies will need to be completed:
- Housing Need (link to the Government's new methodology when finalised)
  - PUSH Integrated Water Management Strategy
  - PUSH Air Quality Assessment
  - Borough Wide Transport Assessment
  - Hayling Island Highway and Transport Infrastructure Assessment
  - Playing Pitch, sport and recreation strategy
  - Havant Borough Biodiversity Strategy (an update to the 2011 Biodiversity Action Plan)
  - Strategic Flood Risk Assessment Phase II
  - Catchment study of the River Ems (being produced by the Environment Agency)
  - Solent Waders and Brent Goose Strategy (being produced by Hampshire Wildlife Trust)
  - Tourism assessment
  - Housing Density Analysis
26. In addition to this, the following studies will need to be updated to inform the Pre-Submission Local Plan.
- Site screenings (to assess potential new sites)<sup>4</sup>
  - Strategic Housing Land Availability Assessment
  - Employment Land Review
  - Sustainability Appraisal
  - Habitats Regulations Assessment
  - Integrated Impact Assessment
  - Housing Constraints and Supply Analysis
  - Infrastructure Delivery Plan

### **Next steps**

27. The Havant Borough Local Plan 2036 comes at a critical juncture for the Borough. There is a large need for regeneration and economic growth, particularly in the town centres and on Hayling Island seafront, all of which need to adapt to economic challenges of the 21<sup>st</sup> century.
28. Nonetheless, it is necessary to remember that this Local Plan is, in reality, the last significant role of the dice in terms of sizeable new greenfield development sites. In taking a positive approach to development, it is essential that Havant does not lose what makes it successful in the first place - the Local Plan needs to build on Havant's success rather than take a step backwards. That is not to say that difficult decisions do not still need to be made nor that significant development on greenfield sites

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<sup>2</sup> All sites are screened for potential impact on heritage, archaeology, ecology, environmental health, flooding and drainage.

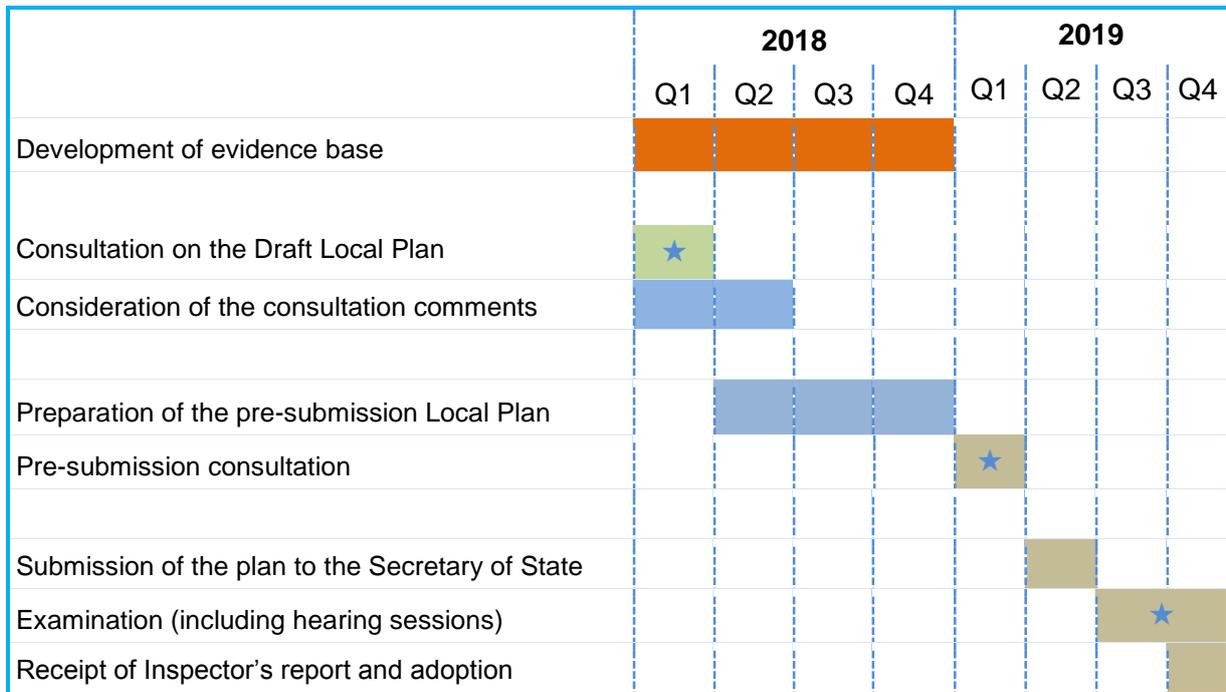
<sup>3</sup> Sustainability Appraisal, Habitats Regulations Assessment and Integrated Impact Assessment.

<sup>4</sup> All potential development sites are screened for access & permeability, ecology, archaeology, pollution and contamination, heritage, drainage.

can or should be avoided. However the Council will seek to make sure that the benefits of development do outweigh any identified impacts when considering development sites.

29. In preparing the Havant Borough Local Plan 2036 (HBLP 2036), the Council has been bold in its approach. Moving forward, it is proposed to maintain this bold approach to preparing the Local Plan so that it is in place as soon as is practicable. The next formal stages are the pre-submission consultation, followed by the submission of the Local Plan to Government for examination.

30. The proposed timetable moving forward is:



31. The interest in the Local Plan amongst the community is clear. As such, the Council intends to send out more newsletters moving forward, keeping residents and other stakeholders updated with the work that is going on.

**Concluding remarks**

32. The Local Plan is a key corporate priority for the Council. The Adopted Local Plan is out of date and the need for the Havant Borough Local Plan 2036 to be prepared as swiftly as possible is clear.

33. The consultation on the Draft Local Plan was successful and thanks should be extended to everyone who took the time to understand what is proposed in the Draft Local Plan and submit their views. A large number of points were raised which need consideration to make sure that the Local Plan is the best possible strategy for the future of the Borough.