

Library Ref: CD17

Pre-Submission Consultation Summary: Main Issues raised

November 2019



Contents

1. INTRODUCTION	3
Purpose and content of this report	3
2. THE PRE-SUBMISSION (REGULATION 19) CONSULTATION	4
Approval of the Pre-Submission Local Plan	4
Who was consulted and how?	4
Responses Received	5
3. MAIN ISSUES: LEGAL COMPLIANCE	6
Procedural.....	6
Duty to cooperate.....	6
Habitat Regulations Assessment	6
Consultation and compliance with the Statement of Community Involvement (SCI).....	7
4. MAIN ISSUES: SOUNDNESS.....	8
Development strategy – Meeting need	8
Land not included in the plan	9
Development on Hayling Island.....	10
Nutrient Neutral Development	12
Approach to Solent Waders and Brent Geese	12
Key Projects.....	15
Infrastructure	17
The Environment.....	18
Housing	21
Commercial Development	23
Development Allocations: Emsworth	23
Development Allocations: Havant & Bedhampton	25
Development Allocations: Hayling Island	27
Development Allocations: Leigh Park	28
Development Allocations: Waterlooville	29
5. NEXT STEPS.....	31
APPENDIX 1: STATEMENT OF REPRESENTATIONS PROCEDURE	32

1. Introduction

Purpose and content of this report

- 1.1 In accordance with Regulation 22 (subsection c.v.) of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), this document sets out the number of representations made on the Council's Proposed Submission Local Plan and provides a summary of the main issues raised in those representations.
- 1.2 The report does not cover all of the issues that were raised during the consultation on the Pre-Submission Local Plan. Rather, it gives a summary of the main issues, focussing on those that go to the heart of the soundness or the legal compliance either of the Local Plan as a whole, a specific policy, the evidence base, or the process the council has followed to arrive at the draft plan.
- 1.3 These summaries allow the reader to determine quickly the key remaining questions regarding the plan's legal compliance and soundness. These are likely to form the matters that will be questioned and discussed during the plan's examination.
- 1.4 This does not imply that other comments have been disregarded. The council has thoroughly reviewed all comments received, and where appropriate has suggested amendments to the plan in its schedule of proposed changes, which will be submitted to the inspector along with the full consultation responses.

2. The Pre-Submission (Regulation 19) Consultation

Approval of the Pre-Submission Local Plan

- 1.5 The Council's Cabinet and Full Council meetings considered the Pre-Submission Havant Borough Local Plan 2036 on 30th January 2019.
- 1.6 Papers for this meeting were published a week before the meeting. At that point, the Council did a mailshot to all those who had asked to be updated on the Local Plan by email. The mail notified them that the Council would be considering the Local Plan, and linked to a booklet explaining what the Local Plan is, why the Council is producing one and the implications of not having a Local Plan. It also linked to all of the relevant documents that the Full Council would be considering.
- 1.7 This email was opened by 1,595 people (48% of respondents). There were also 914 hits (618 unique hits) on the Local Plan's webpage, with additional hits directly to the Cabinet and Council papers page likely, although these were not measured.
- 1.8 The meeting itself was well attended by members of the public. The meeting was also streamed on Facebook Live, where officers provided commentary and answered questions during the live stream¹.
- 1.9 During the course of the Cabinet meeting, an amendment was approved, committing the Council to undertaking further work on the Local Plan's transport evidence base prior to submission of the Local Plan to the Secretary of State for Housing, Communities and Local Government².
- 1.10 At the Full Council meeting, the Local Plan was unanimously approved³.

Who was consulted and how?

- 1.11 Following approval, the Council published the Local Plan 2036 for a six week period (Regulation 19⁴) from 1613 on Friday 2nd February 2019⁵ to 1700 on Monday 18th March 2019.

¹ The live stream is available at [/www.facebook.com/HavantBorough/videos/1181622072004836/](https://www.facebook.com/HavantBorough/videos/1181622072004836/) (part 1) and www.facebook.com/HavantBorough/videos/254824662099581/ (part 2)

² Referred to as the Secretary of State

³ The full list of the recommendations that were approved in at havant.moderngov.co.uk/documents/b33402/Item%203%20-%20Cabinet%20Recommendations%2030th-Jan-2019%2017.30%20Council.pdf?T=9. This includes amendments that were made through the Cabinet's consideration of the Local Plan.

⁵ This was the date and time of the email notification that was sent out to the Local Plan's mailing list.

- 1.12 A number of methods were used to promote the consultation. These were in line with the Council's Statement of Community Involvement and tailored for the specific requirements of the consultation under Regulation 19 and the Planning Inspectorate's Procedure Guide for Local Plans⁶.
- Letters/emails
 - Publication of all proposed submission documents, including the Plan itself, and the evidence base and regulatory assessments on the Council's website and at the Havant Public Service Plaza
 - Publication of the [Local Plan 2036: what it is, how far we've come, how will it help our communities?](#) Booklet
 - Publication of a statement of representations procedure, associated response form and HBC guidance on how to complete it
 - Drop-in sessions were held to help residents understand the process and how to complete the response form:
 - Leigh Park - Leigh Park Community Centre - Monday 11th February 2019 (3-7pm)
 - Hayling Island - Hayling Island United Reform Church - Friday 15th February 2019 (3-7pm)
 - Emsworth - Brook Hall - Thursday 28th February 2019 (3-7pm)
 - Havant & Bedhampton - Havant Public Service Plaza - Wednesday 6th March 2019 (3-7pm)
 - Waterlooville - Waterlooville Community Centre - Saturday 9th March 2019 (11am-4pm)
- 1.13 Representation had to be made on the government prescribed form. This was made clear in the statement of representations procedure. To help in particular residents complete the form, a guidance not was published alongside the form.

Responses Received

- 1.14 Comments were received from 315 individual representors, making 1353 comments on 136 different topics.
- 1.15 A copy of each full representations received is available on the Council's website. These have been redacted to remove personal information. An unredacted copy will also be sent to the Inspector once they are nominated.
- 1.16 The main issues raised are summarised in the following sections.

⁶ The version published on 23 June 2016 was relevant at the time of publication, however the consultation methods are also considered to comply with the most recent version, published 1 July 2019

3. Main issues: legal compliance

Procedural

- 1.17 Respondents felt that the Local Plan has been produced in haste and that the pre-submission consultation was premature. Some considered that some evidence base studies / SPDs / required documents were not published in a timely manner.
- 1.18 Local Development Scheme was not always up to date.

Duty to cooperate

- 1.19 Respondents raised concerns that the Council had yet to publish a Statement of Common Ground or Duty to Cooperate Statement. Some objections highlighted specific cross boundary issues:
- **Unmet housing need** - the need to agree a robust up-to-date statement with nearby authorities that explains where any unmet need will be accommodated
 - **Nutrient Action Plan** - the need for joint working to develop and agree a Nitrogen Action Plan in partnership with Portsmouth City Council.
 - **Natural environment** - there is inadequate evidence to show that the Council has worked with neighbouring authorities including East Hampshire and Chichester District Council to develop policies which protect policies and safeguard wildlife corridors.
 - **Transport** - there has been insufficient engagement with Chichester District Council and West Sussex District Council in respect of the Transport Assessment. Responses highlighted the need to assess the impact on the A259, and the traffic impact associated with the Long Copse Lane allocation (H8) on Westbourne. Further main issues are set out in the 'Mainland TA and A27 Junction' section.

Habitat Regulations Assessment

- 1.20 **Natural England** commented on the HRA and highlighted the below issues:
- Changes to the Habitats Regulations Assessment are recommended, particular in relation to policies E17, E14, H15, H27, H40.
 - Due to the implications of water quality from Budds Farm Wastewater Treatment Works impacting on designated sites, Natural England advises that the Solent and Southampton Water SPA and Ramsar site are screened into the assessment.
 - Uncertainty with regard to the deliverability and appropriateness of the proposed bird refuges to provide mitigation for sites H27 and H40. This should be addressed in the HRA. Alternative solutions may be necessary to support the allocations.
- 1.21 **Chichester District Council** - The quantum and proposed distribution of development for both the Chichester plan area and Havant borough have evolved since assessments were made in relation to drainage from planned development. Therefore, Chichester District Council ask for clarification

that the modelled impacts of development in relation to waste water have been based on reasonable assumptions of planned development across the Chichester District and Havant Borough boundaries.

Consultation and compliance with the Statement of Community Involvement (SCI)

1.22 The following concerns were raised in relation to how the Regulation 19 consultation was carried out:

- The complexity and limitations of the regulation 19 response form, and difficult to understand references to legal compliance and soundness;
- The form was the only way for stakeholders to submit comments on the Pre-Submission Local Plan;
- Lack of access to paper copies of the form - people without internet access have not been able to respond to the consultation;
- There were no displays or leaflets in libraries - paper documentation was not provided, only a plan and booklets available on request;
- Late publication of evidence or no publication at all;
- The complexity of the information in the evidence base;
- The 6-week consultation period was insufficient time for people to respond;
- The Hayling Island Infrastructure Group was not involved sufficiently in the Hayling Island Transport Assessment.

1.23 Detailed comments were also raised in relation to the compliance with the Council's SCI:

- The Council did not comply with the SCI;
- The 2013 SCI was out of date, as some of the community groups for consultation have been renamed and/or no longer exist;
- The Council was premature in consulting on a Pre-Submission Plan before updating the SCI, the Local Plan may need to go back a stage to ensure it is legally compliant;
- The new SCI was not published in time to effectively engage with the community (it was published after the Council approved the Pre-Submission Local Plan for consultation);
- Quarterly newsletters have not been issued in accordance with the SCI;
- The Members' Panel overseeing the plan's preparation did not take place in accordance with the SCI.
- The Community and Placeshaping Board did not give sufficient attention to the update of the SCI.

4. Main issues: soundness

- 1.24 This section of the summary sets out a summary of the main issues raised by respondents in relation to the soundness of the Pre-Submission Havant Borough Local Plan 2036.
- 1.25 It begins with the development strategy and other overarching matters. The remainder of the summary is then ordered broadly in line with the order of the policies in the Local Plan. Comments on key evidence base documents are inserted near to related policies, for example comments on the Hayling Island Transport Assessment sit with comments on development on Hayling Island, and comments on the Strategic Flood Risk Assessment sit with policy E19 Managing Flood Risk in New Development.

Development strategy – Meeting need

General

- 1.26 The plan lacks vision and sensibility.
- 1.27 The Council has failed to properly consider some of the statements they make in the plan.
- 1.28 The Local Authority should back up their promise of 'Sustainable Development' with firm commitment to deliver and monitor the sustainability of their plans, and correct or otherwise reverse any non-sustainable aspect of the developments made, with compensation to those affected where and until that is done.

DR1 | Delivery of Sustainable Development

- 1.29 **Portsmouth City Council** and **Winchester City Council** are broadly supportive that the Plan will exceed the housing need arising from the Government's standard housing need methodology. However, **Fareham Borough Council** object to HBC proceeding with the Plan before work to resolve unmet need in the PUSH area has concluded.
- 1.30 **Historic England** comment that the policy only considers housing and economic development and does not accurately reflect the environmental element of Government policy and sustainable development.
- 1.31 Other representations relate to development needs and supply through the plan:
- support for the use of Government's standard method as the starting point for calculating local housing need;
 - objections on the basis that the annualised target should be 481 dwellings per annum;
 - unmet need within neighbouring authorities within PUSH (specifically in Portsmouth) has been not taken into account;
 - more employment land will be needed if housing need increases;
 - concern that the Government's standard method will not help improve the affordability of housing or meet the requirements of those in genuine housing need.
 - policy fails to provide sufficient flexibility over and above objectively assessed need;

- detailed comments in relation to the Council's sources of housing land supply and related delivery assumptions in relation to large sites including Southleigh;
- further allocations need to be identified (various omission sites suggested – see separate section below)
- Havant is overbuilt, fewer larger sites would be more logical;
- If the plan provides for more than the requirement, the most sensitive sites could be removed from the Plan.
- Many respondents also commented that development on Hayling Island would not meet the NPPF's definition of sustainable development.
- The plan underestimates housing delivery from windfall on Hayling Island; comment was also received that windfall is over estimated and that the Council will not achieve its required housing growth.

DR2 | Regeneration

1.32 No main issues.

Land not included in the plan

1.33 A number of responses were received with regard to sites not included in the pre-submission version of the plan. Responses were also received relating to extending the size of sites currently included within the pre-submission version. All representations were from site promoters or land owners, unless otherwise stated.

Sites not allocated in the Pre-submission Draft Plan

- SHLAA site HB15 (Land known as Southmere Field) should be allocated for development
- SHLAA site HY11 (Land known as Hayling College playing fields) should be allocated for development and linked to an extended allocation for allocated site H30.
- SHLAA site reference EM8 (Land rear of 15-27 Horndean Road) should form its own allocation for development separate to that of allocation KP5.
- SHLAA reference LP127 (Central) (Land known as land east of A3(M)) should be allocated for housing.
- SHLAA site HY46 (Land known as Selsmore Road) should be allocated for housing.
- SHLAA site HB63 (Land known as Kingscroft Farm) should be allocated for housing.
- Phase 8 of the West of Waterlooville Major Development Area should be allocated for housing as development has yet to commence, and as yet no reserved matters application has been approved.
- SHLAA site HB67 (Land known as South of Wade Lane) should be allocated for development.
- SHLAA site HB65 (Land at Portsdown Hill) should be allocated for development.
- SHLAA site EM5/5a (Land known as Westwood Close) should be allocated for development.

- SHLAA Site WV70 (Land known as Hazleton Wood) should be allocated or development.
- SHLAA site EM41 (Land south of Havant Road) should be allocated for development.
- Support was expressed by objectors to potential sites, for the exclusion from the HBLP – SHLAA sites EM35, EM39.

Proposed changes to sites identified in the Pre-Submission Draft Plan

- Proposed extension to draft allocation H22 (Land known as Littlepark House) of approximately 5.3ha
- Proposed extension to draft allocation H30 (Land north of Tournurbury Lane) promoted by adjacent landowner - Linked to HY11
- Proposed extension to draft allocation H24 (Land known as Palk Road) to increase capacity to 55

Development on Hayling Island

Development capacity of Hayling Island

1.34 Representations highlighted reasons why there should not be any further development on Hayling Island. Stakeholders highlighted issues relating to:

- Highway capacity
- The single access to the Island
- Flood risk
- Infrastructure including healthcare, education and utilities

1.35 Multiple responses raised the same or very similar points, paraphrased below:

- A policy or plan for infrastructure on Hayling Island is needed.
- Hayling Island should have its own Local Plan and be treated differently from the rest of the Borough.
- The amount of development proposed on the island has significantly increased since work on the Local Plan started - the consultation should be repeated.
- The Council has underestimated housing delivery from windfall and has not accounted for the increased pressure on infrastructure in the Plan.
- The need for housing on Hayling can be met by windfall sites alone - allocations should be removed from the Plan.
- There is no sea defence strategy for Hayling Island, and there is unlikely to be funding available to protect assets.
- Concerns in relation to discharge of raw sewage into Langstone Harbour. There should be no further development until Southern Water has increased capacity in the waste water network.

- Lack of employment on the island means that residents need to commute off the island to work, which exacerbates congestion on the A3023 during peak travelling hours.
- The structural integrity of the bridge should be assessed, and its maintenance report should part of the Local Plan evidence base.
- Concern that it is extremely difficult for the emergency services to get through heavy traffic on the A3023. Target response times have not been met for a number of years.
- Focus should be on improving sustainable transport solutions, including greater walking and cycling provision.
- The capacity of doctor's surgeries is already overstretched with difficulty getting appointments - development will add further pressure on these services.
- The impact on the natural environment, and in particular wildlife and their habitats as a result of the increased population.

Hayling Island Transport Assessment (TA)

- 1.36 **Highways England** submitted a report compiled by WSP on the Paramics modelling underpinning the TA, which highlights a number of areas requiring further clarification including flow calibration for the A27/A3023 junction.
- 1.37 **Hampshire County Council (Highways)** comment that the type and magnitude of development on Hayling Island will lengthen journey time off and onto the island by a significant percentage on a route which suffers from journey time irregularity and unreliability. Significant housing on an Island with limited accessibility by sustainable modes of transport and historically low self-containment levels will most likely result in car dependent development.
- 1.38 Other stakeholders highlighted issues relating to:
- Capacity of the A3023
 - Delays to journey times
 - Modelling and data inputs
 - Peaks during summer months
- 1.39 Multiple responses raised the same or very similar points, paraphrased below:
- The three mitigation packages have a negative impact and reduce the performance and capacity of the A3023.
 - The TA does not consider the effects of additional traffic flow on West Lane and through Northney village as a result of the mitigation.
 - The modelling in the Hayling Island TA cannot be relied upon, due to: use of out of date information; inappropriate bluetooth monitoring sites; trunk road modelling; being informed by the Travel Questionnaire which is inaccurate and uses random sampling.
 - The microsimulation model should include A3023 flow capacity and loading issues; frequency and duration of congestion periods; should include Highways England growth factors; windfall development; Highways England growth projections and factor in flood risk.

- Concerns that 'neutral' month traffic data was used to model the impact on the highway network which did not take into account traffic peaks during summer months.
- The Council's seafront regeneration plans will increase visitor traffic, and this is not reflected in the TA.
- The A27 junction should be re-modelled with the A3023 to accurately assess highway capacity.
- The TA focuses on journeys to and from destinations on the island, and not the single access to and from the mainland.
- The A3023 capacity is fixed and no assessment of its capacity has been made over the lifetime of Local Plan development.
- The TA takes an average of traffic flow over time and does not reflect actual peaks experienced.
- The Hayling Island Infrastructure Committee and local residents' associations were excluded from the parameter setting and modelling process for the Hayling Island TA. Local knowledge and experience have not been sufficiently explored.
- The microsimulation model for the Hayling Island road network is an expensive exercise which would normally be carried out by developers.

Nutrient Neutral Development

- 1.40 **Natural England** recommends that to appropriately address uncertainty of the impact of local plan development on the deterioration of the water environment of the designated sites a policy to commit to a nutrient management plan or similar strategy to offset the delivery of increased nutrients from development should be created. This is to ensure the local plan and on-going planning applications meet legal requirements until a wider Integrated Water Management Strategy can be developed.
- 1.41 **Natural England** advises that larger developments including all EIA development should calculate a nutrient budget and achieve nutrient neutrality. It may be difficult for site smaller than 50 units and non-EIA development of brownfield land to achieve nutrient neutrality. It is recommended that an interim approach is set up for the borough that developments can contribute to, thereby ensuring that this uncertainty is fully addressed by all applications.
- 1.42 **Natural England and the Environment Agency** suggest that implementing the higher standard for water efficiency to 110 litres per person per day would decrease the amount of nitrogen produced by development and decrease the amount of mitigation that may be necessary.

Approach to Solent Waders and Brent Geese

Solent Waders and Brent Goose Strategy

- 1.43 The evidence used in the SWBGS does not correlate with actual survey results taken, and is based on inaccurate assumptions.

E17 | Solent Wader and Brent Goose sites

- 1.44 **Natural England** have raised concerns in relation to the uncertainty of securing refuges and delivering them. They have suggested that there needs to be a commitment within the policy to secure the early delivery of a strategic bird reserve to address the loss of Secondary and Low Use Sites.
- 1.45 Other objections raised the following issues:
- Development should not take place on sites which support internationally important species. The evidence which supports this policy approach is unfounded and unsound.
 - It is inadequate for a site that has for years hosted over-wintering wildfowl to simply be relocated. There is not sufficient evidence to show that wildfowl would move to a newly sited location.
 - The total area of mitigating land is less than the total area of land lost to development.
 - It is unclear how any mitigation will be enforced and managed. Good quality management secured in perpetuity for the proposed refuge cannot be guaranteed.
 - There is no flexibility to mitigate any development impact in exceptional cases.
 - It is an un-robust approach which increases the cost of new homes.
 - Comments in relation to the Local Plan and CIL Viability Study raised concern that developer costs associated with the creation of replacement habitats for Solent Wader and Brent Geese have been excluded from the whole plan viability work.

Loss of Core Area at Rook Farm (H27)

- 1.46 **Natural England** confirm it may be possible to provide an alternative offsetting site to Rook Farm provided the criteria set out in the SWBGS Offsetting and Mitigation Guidance are met. The location of an offsetting site within the Hayling Island Brent Goose Refuge is acceptable in principle, but there is currently uncertainty about whether this can be delivered.
- 1.47 Other representations include objections to the allocation on the grounds that the site is heavily used by birds; is functionally linked to the SPA; adverse impacts on the integrity of the SPA/SSSIs and their species; no justification for the loss of Core Area for Brent Geese and Waders; high cost of providing a replacement site and the impact on the viability of development.
- 1.48 Please see other main issues for the Rook Farm (H27) development allocation.

Loss of Primary Support Area at Land north of Sinah Lane (H29)

- 1.49 **Natural England** welcomes and supports that the allocation will be providing a refuge (Policy E26). It is also noted that mitigation was secured following the grant of planning permission for UE21, The Oysters (Local Plan (Allocations) 2014). Natural England supports the proposal in the Biodiversity Strategy for the local planning authority to monitor the effectiveness of this earlier mitigation and ensure there is no double counting of schemes as new development sites come forward.
- 1.50 Other representations include objections to the allocation on the basis that it is a Primary Support Area for Brent Geese and Waders; the refuge area will be negatively affected due to construction noise and increased human presence; the site lies within existing mitigation area for previous development (the Oysters) and that the reduced area will be less suitable for birds; the SuDS system proposed will reduce the refuge area; fence and borders associated with the refuge need to be properly maintained; concerns over the farmer's use of bird scarers and crop planting which

makes the site less suitable for birds; and the soft landscaping proposed not being suitable for Brent Geese.

- 1.51 Please see other main issues for the Land north of Sinah Lane (H29) development allocation.

E25 | Broadmarsh Coastal Park Brent Goose and Wader Refuge

- 1.52 **Natural England** supports the identification of Broadmarsh as a permanent refuge area and acknowledges that its deliverability is more certain than the Hayling Island Brent Goose Refuge, as it is owned by Havant Borough Council. However, it has concerns about the appropriateness of Broadmarsh to fully mitigate the numbers and species at Campdown (H40). They recommend that Broadmarsh Coastal Park refuge is brought forward in a phased manner to allow an appropriate refuge to be available in advance of the loss of Secondary Support Areas and Low Use sites within the Borough.

- 1.53 Other respondents raised the following issues:

- **Deliverability** – time and cost involved in creating replacement habitat; development viability implications of mitigation
- **Suitability and effectiveness of mitigation** - the site is unfeasible as mitigation as it is already used by SPA birds; area is popular destination for walkers, cyclists and visitors; disturbance through human activity and surrounding uses including car parks, angling club, boat storage and public slipway; surrounding uses are not compatible with refuge; SPA species will be at risk from oxides of nitrogen; National Grid line crosses the site; and refuge would not include livestock grazing to replace what would be lost at Campdown (H40). Lack of credible evidence / inadequate information as to whether replacement habitats are effective, and the time it can take before a refuge can be considered to be a genuine replacement; a larger more suitable refuge for SPA species should be found.
- **Loss of amenity / recreation** – site is well used by walkers, cyclist and visitors. Any fencing off to protect bird life will reduce amenity and adversely impact health and wellbeing.
- **Nitrogen Action Plan** – The refuge should be excluded from the Plan until the joint Nitrogen Action Plan (for air quality) with Portsmouth City Council has been developed and shown to be working.

E26 | Hayling Island Brent Goose and Wader Refuge

- 1.54 **Natural England** is supportive of the principle of the refuge but acknowledges uncertainty as to whether site can be secured and delivered. The site promoters of Rook Farm (H27) support the delivery of the refuge and welcome the opportunity to work with the Council.

- 1.55 Other representations raised the following matters:

- **Deliverability** - Delivery of the refuge dependent on funding from other developments (H27 and H29); doubt over Council's ability to secure and ensure management of land in perpetuity given previous issues of compliance.
- **Effectiveness of mitigation** - Concern the refuge is unfeasible as mitigation given the site is already used by birds; it is not a tried and tested means of mitigation; bird counts are based on biased surveys; potential for disturbance with the realignment of the Billy trail.

- **Flood risk** - the refuge is unsustainable due to flood risk and there is insufficient flood risk evidence; sequential test needs to be passed; the coastline is subject to no active intervention.

Key Projects

KP1 | Havant Town Centre

- 1.56 The housing number of 750 is not sufficiently ambitious.
- 1.57 East Street should be included in the town centre boundary.

KP2 | Waterlooville Town Centre

- 1.58 The housing number of 600 is not sufficiently ambitious.

KP3 | Hayling Island

- 1.59 **Natural England** and other objectors have concerns about the impact of developments on protected sites, particularly development at Beachlands and Northney Marina.
- 1.60 The **Environment Agency** has concerns that the policies do not provide sufficient information to support residential development on sites that are at risk of flooding.
- 1.61 **Chichester Harbour Conservancy** considers that proposed development at Northney Marina does not meet the exceptional circumstances test for major development in an AONB.
- 1.62 Issues highlighted in other representations were as follows:
- **Impact on tourism, visitors and resident users of allocated sites** - Loss of the 'bucket and spade' character of Hayling Island; The loss of the funfair at Beachlands would affect tourism; The loss of car parking generally, and the loss of a car park providing accessible access to the seafront; The economic impact of the proposed development has not been considered; The loss of public green space;
 - **Coastal matters** - Issues relating to coastal erosion generally and at Westbeach particularly; The Nab car park and Creek Road are subject to flooding; Impact on protected sites and species in the harbour
 - **Form of development** - The size and scale of the proposed developments; As a lot of the proposed development is on public land more affordable housing should be provided; Retail units as part of the proposed residential development at Eastoke Corner are not needed or financially viable; The anticipated quantum of dwellings at Beachlands is too low for a brownfield site;
- 1.63 The landowner of Funlands (the funfair at Beachlands) has made detailed comments in respect of Beachlands, Hayling Island (KP3). They consider that the Hayling Island Seafront Regeneration Analysis and Feasibility Study underrepresents the site's capacity and does not give due regard to infrastructure and other costs.
- 1.64 A number of concerns were raised relating to island-wide infrastructure and the evidence base that has informed allocations on Hayling Island. These matters have been summarised within the Development Capacity of Hayling Island and Hayling Island Transport Assessment sections of this report.

KP4 | Leigh Park District Centre

- 1.65 The housing number of 75 is not sufficiently ambitious.

KP5 | Southleigh

- 1.66 Numerous commenters object to the proposed development allocation on basis of:
- Loss of a greenfield site;
 - Loss of the Emsworth gap;
 - Unacceptable impact on wildlife including bats;
 - Loss of trees and hedgerows;
 - Loss of agricultural land;
 - Impact on infrastructure (doctors, schools, drainage etc) / lack of planned improvements to infrastructure;
 - Highways impacts - safety and volume (in particular on Southleigh Road and in combination effects with other sites in HBC and CDC areas);
 - Remaining uncertainty over need for and deliverability of A27 junction; Development should only go ahead with direct link to A27, and only after this infrastructure is in place;
 - Potential for increase in crime; loss of property value, loss of privacy, reduced quality of life;
 - Questioning the need for 2,100 dwellings on this site;
- 1.67 Detailed comments were also made on the Southleigh Masterplan linked to this policy, including concern that the Masterplan was not agreed by the workshop participants and does not reflect the feedback received at consultation events.

KP6 | Langstone Technology Park

- 1.68 The main objections are that:
- The Draft Local Plan included a commitment to a targeted consultation on a masterplan which has not taken place;
 - The current occupancy of the park is low and there is a lack of market confidence;
 - The impact on the highways network and the A3023 has not been assessed through the Hayling Island Transport Assessment.

KP7 | Dunsbury Park

- 1.69 **Highways England** support reference to the A3(M) bridge crossing as an important pedestrian and cycling route but would welcome the opportunity to discuss improvements with the site promoter, HBC and Hampshire County Council to ensure the viability of the proposed development.

KP8 | Havant and South Downs Colleges

- 1.70 The landowner supports the policy but considers the allocation at Havant College for “up to 20 dwellings” to be unnecessarily restrictive.

KP9 | Havant Thicket Reservoir

- 1.71 **Historic England** request wording changes to ensure further protection to the historic environment and state that the entirety of the Registered Park should be removed from the allocation.
- 1.72 **Natural England** have concerns over the cumulative impact of allocations, including KP9, on the Forest of Bere landscape. Natural England also have concern over the loss of irreplaceable habitat and impact on protected species as well as the recreational impact caused by the reservoir development on surrounding habitats. Wording changes have been suggested to address the concerns raised.

Infrastructure

IN1 | Effective provision of infrastructure and Infrastructure Delivery Plan (IDP)

- 1.73 The IDP is inadequate because it does not recognise the infrastructure requirements for a 15+% increase in population.
- 1.74 The IDP should recognise the particular issues that Hayling Island faces eg elderly population; single road; It is suggested that a separate policy may be needed for Hayling Island (see also Hayling island section)
- 1.75 Objection to safeguarding of land for a flood alleviation scheme at Westwood Close - IN1 (o)
- 1.76 Various detailed comments on individual infrastructure items.

IN2 | Improving transport infrastructure

- 1.77 No main issues raised regarding this particular policy, but a number of main issues raised in relation to transport infrastructure more generally - see also Hayling Island General, Hayling Island Transport Assessment, Mainland Transport Assessment and A27 Junction.

Mainland Transport Assessment (TA) and A27 Junction

- 1.78 Comments have been received that flag a lack of confidence in the findings of the Mainland TA. Representations have also been made raising concern about uncertainty in relation to A27 Junction.
- 1.79 **Hampshire County Council (Highways)** supports the use of the SRTM in the TA but considers the report to be incomplete; detailed suggestions made.
- 1.80 **Highways England** have submitted a technical review of the TA and would welcome the opportunity to discuss the proposed mitigation measures and the associated modelling results produced for A3(M) and A27, and are keen to continue discussions with Havant Borough Council about the potential siting and layout of a new junction on the A27.
- 1.81 **Chichester District Council** and **West Sussex County Council (Highways)** seek clarification that the modelled transport impacts of development have been based on reasonable assumptions of planned development across the Chichester District and Havant Borough boundaries. Specific attention is drawn to the potential impact on the A27 Chichester Bypass and the A259, and whether the impact of development in Havant Borough, and the need for mitigation, has been robustly assessed.

IN3 | Transport and parking in new development

- 1.82 Both support for and objections to the requirements for electric vehicle charging points have been received; objectors believe that the requirement is premature and over prescriptive.

IN4 | Access onto classified roads

- 1.83 No main issues.

IN5 | Future management and Management Plans

- 1.84 No Responses.

The Environment

E1 High quality design

- 1.85 No main issues.

E2 | Health and wellbeing

- 1.86 No main issues

E3 | Landscape and settlement boundaries

- 1.87 Following the allocation of Land north of Highbank Avenue (policy H47) it is requested that the settlement boundary of Waterlooville is amended to include the allocated land.
- 1.88 Comments were received which support the policy; others seek greater flexibility to adapt to changing circumstances to meet development needs.

E4 | Development on the coast

- 1.89 No main issues.

E5 | Chichester Harbour AONB

- 1.90 **Chichester Harbour Conservancy** considers that because the policy does not specifically refer to 'natural beauty', this policy is not legally compliant.

E6 | Best and most versatile agricultural land

- 1.91 The settlement boundary map (Policy E3) follows the Borough's geographical boundaries and development allocations rely on extensive use of agricultural land. There is hardly any land left outside the settlement boundary and no part of the Borough is deemed rural so unclear how the policy will work or if it serves a useful purpose.
- 1.92 The Local Plan includes not only a loss of BMV agricultural land for housing but also to Brent Goose and wader refuges to deliver the housing.
- 1.93 The Council has not made a case to defend its most valuable agricultural land against housing need.
- 1.94 It is also questioned whether the policy wording is compliant with the NPPF which highlights that planning policies should recognise the benefits of BMV agricultural land whereas E6 restricts proposals that would result in the loss of such land.

E7 | Hermitage Stream

- 1.95 No main issues.

E8 | Protection of existing open space

- 1.96 No main issues.

E9 | Provision of public open space in new development

- 1.97 No main issues.

E10 | New and extended Cemeteries

- 1.98 No main issues.

E11 | Sports and recreation

No main issues.

E12 | Low carbon design

- 1.99 The **Environment Agency** and **Natural England** suggest water efficiency should be addressed through broadening this policy or creating a new one. Long term implications for water resources with respect to climate change are uncertain. It is recommended that the enhanced water efficiency standard of 110 litres/person/day is included (see also section on Nutrient Neutral Development).
- 1.100 Suggestion that development should be carbon neutral or that policy should be redrafted and applications that fail to meet the Council's standards refused. Clear targets are needed and they would need to be amended following forthcoming changes to Part L. The 19% requirement is now a minimum and it is suggested that local authorities are able to seek higher standards.
- 1.101 It is also questioned whether the 19% CO2 reduction requirement is justified, that it is too onerous that its viability should be tested and that it would be inappropriate to penalise development that cannot achieve this figure.
- 1.102 The requirement to meet BREEAM standards should only apply where it is appropriate and feasible to do so. Current wording is too restrictive.
- 1.103 Suggestion that Havant's Energy Strategy, on which the policy is partly based, is inadequate.

E13 | Historic environment and heritage assets

- 1.104 **Historic England** considers the Plan should contain more detailed development management policies for different types of heritage asset. Propose wording changes to policy.
- 1.105 Policy should differentiate between substantial harm and less than substantial harm to heritage assets. Detail from the supporting text should be incorporated into the policy.

Havant Borough Biodiversity Strategy

- 1.106 **Natural England** welcomes and supports the Biodiversity strategy.
- 1.107 It is advised that consideration is given to an approach which will secure biodiversity offsetting. If offsetting is required, development can pay for conservation projects that deliver biodiversity benefits.

- 1.108 It is recommended that consideration is given to developing a suite of projects that development within the Brough can contribute to thereby ensuring the biodiversity within the Borough is protected and enhanced. This approach can be used by development with limited opportunities for biodiversity net gain on-site.
- 1.109 It contains poor information, survey data needs to be kept up to date and it was prepared without cross-boundary partnership.
- 1.110 It is a weak Biodiversity Strategy lacking in specific strategies which ensure the avoidance of harm, and lacks a strategic approach to maintaining and enhancing networks of habitats and green infrastructure across local authority boundaries.
- 1.111 Does not achieve protection of protected species and protected habitat nor the minimising of impacts, and establishing coherent ecological networks that are more resilient to current and future pressures.
- 1.112 Overlooks that the presumption in favour of sustainable development does not apply where the plan is likely to have a significant effect on a habitats site.

E14 | The Local Ecological Network

- 1.113 **Natural England** have concerns about the uncertainty about the impacts from local plan development on the water quality of designated sites and have suggested further amendments to wording to address the uncertainty. Natural England have also provided recommendations for air quality to ensure it is adaptive in respect to additional growth in the South Hampshire region.
- 1.114 **Chichester District Council** have asked for wording to refer to joint working on air quality impacts and water quality impacts.
- 1.115 **Westbourne Parish Council** have highlighted that the landscape character of the River Ems should be protected and cross border impacts should be considered as well as wildlife corridors and linking them to green infrastructure.
- 1.116 Concerns over the approach used and lack of detail within the policy towards biodiversity net gain.

E15 | Protected species

- 1.117 There is concern that not all protected species are covered within this policy. There is also an over dependence on mitigation rather than an avoidance of harm.
- 1.118 There is concern over the level of information that would be required to support a planning application.

E16 | Solent Special Protection Areas

- 1.119 The policy is not as effective as it could be with regards to non-residential development within the policy text itself.
- 1.120 There are concerns that the policy only addresses increased recreational disturbances from new developments and other impacts such as water quality, light intrusion and noise are not addressed.

E17 | Solent Wader and Brent Goose feeding and roosting sites

- 1.121 Please see Solent Waders and Brent Goose section above

E18 | Trees, hedgerows and woodland

1.122 No main issues raised.

Strategic Flood Risk Assessment

1.123 **The Environment Agency** support the flood risk evidence that has been produced to underpin the plan.

1.124 The SFRA has not properly considered the wider context of sites, just the site and its immediate surroundings Local Plan 2036.

1.125 Soundness is questionable: The SFRA does not provide sufficiently detailed information to satisfy all of the requirements of a site-specific FRA as outlined in the National Planning Policy Framework.

1.126 The Council is not looking far enough into the future to ensure that developments are protected for their lifetime (100yrs) from flooding - development cannot be considered where the lifetime of developments is compromised by flooding.

1.127 Detailed comments on SFRA findings regarding site with SHLAA reference HY46.

E19 | Managing flood risk in new development

1.128 The policy should not seek to resist development on unallocated sites in Flood Zones 2 & 3.

1.129 Policy (bullet f) contravenes CIL Regulations.

1.130 The policy needs greater emphasis on flood protection measures for new builds in vulnerable areas.

1.131 There is a need for a better understanding of cumulative flooding from various sources and commitment to more community studies on flooding.

E20 | Drainage infrastructure in new development

1.132 No main issues raised.

E21 | Aquifer Source Protection Zones

1.133 No main issues raised.

E22 | Amenity and pollution

1.134 No main issues raised.

E23 | Air quality

1.135 No main issues raised.

E24 | Contamination

1.136 No main issues raised.

Housing

H1 | High quality new homes

1.137 **Hampshire County Council (Adult Services)** welcomes policy but suggests policy should require all new affordable homes to be built to Building Regulations M4(2).

- 1.138 Objections were received from housebuilders in relation to the requirements for internal space standards and enhanced accessibility and adaptability standards. Issues were raised around the Council's justification for the introduction of these requirements and impact on affordability.
- 1.139 Comments on the Local Plan and CIL Viability Study raised concern that the viability of space standards has only been tested at a relatively high level and it may compromise the deliverability of allocations.

H2 | Affordable housing

- 1.140 **The Emsworth Forum** object to the policy on the basis there should be a requirement for 40% affordable housing in Emsworth in accordance with the Draft Neighbourhood Plan.
- 1.141 Other objections relate to:
- The requirement for affordable home ownership products to be provided as shared ownership products and flexibility of the associated tenure split; and
 - The plan not adequately addressing the need for affordable rented homes and concern that shared ownership products will not meet housing need.
 - Affordable housing requirement should be reviewed as a result as a result of density requirement in H3 (see below)

H3 | Housing density

- 1.142 Representations consider the policy should be more flexible to account for local circumstances.
- 1.143 Density requirements should be tested through the Local Plan and CIL Viability Study – the density thresholds are not reflected. Concerns raised that development will not be viable with increased levels of planning obligations. Suggested the affordable housing requirement should be reviewed as a result.

H4 | Housing mix

- 1.144 The policy should be more flexible to account for local circumstances. Concerns are also raised in relation to the impact on development viability.

H5 | Retirement and specialist housing

- 1.145 The need to plan for differing tenures of specialist housing products has not been considered. Sites for specialist housing should be identified.

H6 | Residential annexes

- 1.146 No main issues raised.

H7 | Gypsies, travellers and travelling showpeople

- 1.147 The requirement in H7b to simply demonstrate that the applicant is a member of the relevant community is against the process set out in the Planning Policy for Traveller Sites. The text should be reverted to what was in the Draft Local Plan which states that the proposal should meet an identified local need, however **Winchester City Council** supports the proposed approach in the Pre-Submission Plan.

Self and custom build housing

- 1.148 Suitable sites and plots for self and custom build housing should be identified in the Local Plan so that not all sites are built out by large developers. The Plan should signal the Council's responsibility under the Right to Build legislation.

Commercial Development

C1 | Protection of existing employment sites

- 1.149 No main issues.

C2 | Tourism

- 1.150 The policy test for the loss of tourism premises should include a criteria-based assessment to consider the suitability of alternative 'non-tourism' uses

C3 | Cowplain District Centre

- 1.151 No main issues raised.

C4 | Emsworth District Centre

- 1.152 No main issues raised

C5 | Mengham District Centre

- 1.153 No main issues raised.

C6 | Local centres, local shops and services

- 1.154 No main issues raised.

C7 | Protection of existing community facilities and shops

- 1.155 The policy should make explicit reference to it being applicable to cultural facilities which may include sui generis uses (for consistency with NPPF paragraph 92).

C8 | Food, drink and entertainment uses

- 1.156 Object to the policy on the basis that there have been no assessments of demand or need for hot food takeaways; the impact on jobs, accessibility, choice, vitality and viability; and what concentrations might be acceptable Borough wide having regard to catchments and town centres.
- 1.157 Support for policy but reference to use of menu sampling conditions would have an unacceptable impact on business and would take an inconsistent approach to different types of food operations.

Development Allocations: Emsworth

H8 | Land north of Long Copse Lane

Objection to the allocation, broadly covering:

- The site is in an isolated, sensitive, unsustainable location;
- The site yield is not needed for the Council to meet its housing target;

- Development here would be detrimental to the landscape / the rural character of this part of the borough, and would have an impact on the South Downs National Park;
- Unacceptable impacts on transport and social infrastructure of surrounding area; as well as road safety;
- Unacceptable impact on habitats and biodiversity, in particular the wildlife corridors from the South Downs National Park to Chichester Harbour AONB;
- Increased flood risk.

1.158 **West Sussex County Council** considers that the quantum of development should be based on drainage capacity.

1.159 The Landscape Study is inconsistent in its consideration of land parcels at site H8.

H9 | Land at Selangor Avenue

No main issues raised.

H10 | Land west of Coldharbour Farm

No main issues raised.

H11 | Gas Site, Palmer's Road

No main issues raised.

H12 | Emsworth Victoria Cottage Hospital

No main issues raised.

H13 | Fowley Cottage

1.160 **Chichester Harbour Conservancy** considers that the proposal constitutes a major development just outside the AONB, which will affect the character and setting of the protected landscape.

1.161 Other representations also object to the scale of development proposed on the allocation, and the increase from 7 dwellings in the Draft Local Plan to 40 dwellings in the Pre-Submission Local Plan; concerns are related to:

- the developable area likely to be restricted due to flood risk and aquifers which underlie the site;
- restricted access and highway safety;
- significant extra car parking associated with improved/new access to coastal path;
- impact on mature and protected trees;
- impact on local infrastructure;
- the loss of open space / greenfield site.

C9 | Interbridges West

1.162 Potential conflict between allocation here and need to safeguard land for A27 junction, calling into question deliverability of one or the other.

Development Allocations: Havant & Bedhampton

H14 | Forty Acres

- 1.163 **Highways England** acknowledge the current planning application, and discussions between the applicant, Havant Borough Council and Hampshire County Council regarding a suitable potential mitigation package to integrate pedestrian and cycle routes between the development and the Rusty Cutter roundabout and ensure the safe and efficient operation of the strategic and local road networks are maintained for all road users.
- 1.164 The site promoter is supportive of the policy but does not consider that mitigation for Solent and Waders should be provided pre-development, but the first winter season following commencement of development. They also consider that parts of the policy should be more positively worded. Wording changes proposed.
- 1.165 Other main issues raised:
- concerns around further traffic in this area; highway safety and school children having to walk/cycle to school; and highway improvements needed around the Rusty Cutter roundabout;
 - concern about noise and air pollution both to future occupants and caused by development; impact on residents' health and wellbeing.
 - Impact on wildlife and ecology; site should be designated as a Primary Support Area for Brent Geese and Waders; and loss of protected wildlife including bats.
 - Loss of high quality agricultural land; brownfield sites should be used first; ignores PUSH statement that gaps will be maintained; and need to maintain identity between Havant and Portsmouth
 - improvements to education, health facilities and other infrastructure needed;
 - Concerns in relation to size of pumping station needed in south west of the site, vibration, noise and potential odour associated with the pumping station; impact on residential amenity of Westway residents; what happens in the event of the failure of the pumping station.

H15 | Land east of Castle Avenue

- 1.166 No main issues raised.

H16 | Land south of Bartons Road

- 1.167 No main issues raised.

H17 | Portsmouth Water Headquarters

- 1.168 No main issues raised.

H18 | Camp Field, Bartons Road

- 1.169 It is questionable whether development of the site is feasible without causing irreparable harm to the populations of rare bat species.

H19 | Havant Garden Centre

1.170 No main issues raised.

H20 | Land south of Lower Road

1.171 **Historic England** notes that development could have some impact on the conservation area, but that the policy includes a number of requirements intended to ensure that the impacts on heritage assets that would arise from the development of this site will be minimised. Historic England considers that, if these requirements are strictly adhered to, the impacts on the special interest, character and appearance of the Conservation Area, as currently designated, arising from the development of this site would be acceptable.

1.172 Objectors claim that the development cannot be considered sustainable, due to:

- Cumulative impact and harm to landscapes of archaeological, historical and cultural heritage importance and their settings, in particular Old Bedhampton Conservation Area and loss of historic hedgerow and sunken lanes;
- Highways safety and highway capacity impacts;
- Likely decrease in walking and cycling and associated health and wellbeing effects;
- Loss of BMV agricultural land;
- Loss of tranquillity;
- Increase in air pollution;
- Impact on wildlife, including Bechstein's bat, Brent geese and wading birds;
- Loss of potential ecological mitigation land;
- Sets precedent for further development on adjacent land;
- Impact on social infrastructure;
- Poor design;
- Prematurity;
- Remote location for social housing;
- Unlikely to fully be in 5 year supply;
- Light pollution;
- Loss of (rural) character and local distinctiveness;
- Conflicts with LTP3 South Hampshire Joint Strategy Policies and Objectives.

1.173 The Landscape study has failed to consider a number of relevant factors in relation to the area around site H20. Independent analysis has been submitted to the Council and not considered.

1.174 It is unclear whether mitigation would be effective and what monitoring and review mechanisms exist. Mitigation must not be seen as a tool to merely advance contentious aspects of a plan with little regard to outcomes.

- 1.175 The allocation is based on flawed assessments (Landscape study; Sustainability Appraisal and Integrated Impact Assessment).
- 1.176 Key pieces of evidence were not completed in time to inform the allocation (Conservation Area review; Transport Assessment; Bechstein's Bat Protocol; Brent Goose and Wader mitigation).
- 1.177 The previous inspector rejected an allocation here, and the position has not changed since that report (2014).

H21 | Wessex Site

- 1.178 No main issues raised.

H22 | Littlepark House

- 1.179 It is questionable whether development of the site is feasible without causing irreparable harm to the populations of rare bat species.

H23 | Southleigh Park House

- 1.180 It is questionable whether development of the site is feasible without causing irreparable harm to the populations of rare bat species.

H24 | Land at Palk Road

- 1.181 No main issues raised.

H25 | Helmsley House

- 1.182 No main issues raised.

H26 | 9 East Street

- 1.183 No main issues raised

C10 | Brockhampton West

- 1.184 No main issues raised.

Development Allocations: Hayling Island

H27 | Rook Farm

- 1.185 Various representations raised issues in relation to the loss of the Core Area for Brent Geese and Waders (these are included in the Brent Goose and Wader section above).
- 1.186 Objectors claim that the development cannot be considered sustainable, because:
- Planning permission for housing development was previously refused;
 - The allocation is not required for the Plan to meet housing need;
 - It is unclear how access onto Manor Road will be achieved but access from St Mary's Road is unsuitable;
 - Highways impact of the development;
 - Loss of grade 2 agricultural land;

- Land used for recreation and dog walking;
- Loss of amenity for existing residential properties;
- Impact on St Mary's Church;
- The site is prone to flooding;
- Impact on wildlife.

H28 | Fathoms Reach

1.187 No main issues raised.

H29 | Land north of Sinah Lane

1.188 Various representations raised issues in relation to the loss of the Primary Support Area for Brent Geese and Waders (these are included in the Brent Goose and Wader section above)

1.189 Objectors consider that the development cannot be considered sustainable because:

- The site is designated as a SINC;
- Site has complex drainage system; concerns in relation to raising ground level and the use of the SuDS;
- Recent failures in the wastewater network;
- Surface water flooding during high tides and storms; and tidal flood risk;
- Highway congestion and road safety through West Town;
- Need to maintain safe routes through to the Billy trail;
- Development viability given the site constraints and loss of greenfield/agricultural land.

H30 | Land north of Tournurbury Lane

1.190 Object to the allocation on the basis there is a restrictive covenant on the land and no development may take place without written agreement of the Tournurbury Woods Estate.

H31 | Manor Nurseries

1.191 No main issues raised.

H32 | Pullingers

1.192 No main issues raised.

H33 | Land rear of 13-21 Mengham Road

1.193 No main issues raised.

Development Allocations: Leigh Park

H34 | Cabbagefield Row

1.194 No main issues raised.

H35 | Colt Site

- 1.195 No main issues raised.

H36 | Scottish and Southern Energy Offices

- 1.196 The site promoter considers an allocation for a mixture of residential and a builder's yard based on an earlier pre-application enquiry to be unsound (included in the Draft version of the Local Plan). The site should be allocated for a range of uses given that a wholly residential scheme has not come forward since the site was allocated in the Allocations Plan (2014).

H37 | Land at Dunsbury Way

- 1.197 No main issues raised.

H38 | Land at Riders Lane

- 1.198 Concern that the density requirement is not consistent with the findings of the Local Plan and CIL viability study and may make this development unviable. The threshold for affordable housing may therefore need to be reviewed.

H39 | Strouden Court

- 1.199 Concern that the density requirement is not consistent with the findings of the Local Plan and CIL viability study and may make this development unviable. The threshold for affordable housing may therefore need to be reviewed.

C11 | Land at Hulbert Road

- 1.200 No main issues raised.

Development Allocations: Waterloo

H40 | Campdown

- 1.201 Consultees, including **Natural England**, highlight that the site is a Primary Support Area for Brent Geese, and question whether adequate mitigation is possible. It is Natural England's view that a thorough mitigation strategy will be required and advise that it may be difficult to achieve net biodiversity gain from this development.
- 1.202 **Historic England** state that development at Campdown has the potential to affect the significance of three scheduled monuments and requests that further work is undertaken, to fully assess the contribution of the setting of these three scheduled monuments to their significance. An assessment should also be made of the potential archaeological significance of these settings, before Historic England would consider this allocation is sound, and to indicate whether or not development on this site is acceptable in principle and, if so, over what area and of what layout and form.

H41 | Woodcroft Farm

- 1.203 No main issues raised.

H42 | Blue Star

- 1.204 No main issues raised

H43 | Goodwillies Timber Yard

1.205 No main issues raised.

H44 | Padnell Grange

1.206 No main issues raised.

H45 | Woodcroft Primary School

1.207 No main issues raised.

H46 | Land at Waterloooville Golf Club

1.208 No main issues raised.

H47 | Land north of Highbank Avenue

1.209 **Winchester City Council** highlights that the site is included in the Winchester SHELAA however that does not give commitment to allocating it. Part (a) should be amended, suggested text is provided.

1.210 The site promoter supports the allocation though highlights a discrepancy in the suggested yield between the policy and supporting text. Supports a yield of 25 dwellings.

C12 | Former BAE Systems Park

1.211 No main issues raised.

5. Next steps

1.212 The next formal stage in the Local Plan's preparation is its submission to the Secretary of State.

1.213 Prior to the Local Plan's submission, the further work on the evidence base and other supporting documents will be completed and published:

- **Housing need and supply:** an update is needed following revisions to housing need methodology inputs and the fact that the plan will be submitted following the release of annual data on housing completions
- **Employment Land Review:** an update is needed as the plan will be submitted following the release of annual data on commercial completions
- **Mainland Transport Assessment Addendum – Southleigh Study:** this will clarify whether there is a need for a direct link onto the A27 to support the development of Southleigh and other nearby development, and if needed, how this can be achieved. This will represent the additional transport evidence base that is needed on the mainland, as committed to at the Full Council meeting of 30th January 2019.
- **Hayling Island Transport Assessment Addendum:** this will clarify the transport mitigation measures that are needed on the island in order to accommodate the level of development proposed in the Local Plan. This will represent the additional transport evidence base that is needed on Hayling Island, as committed to at the Full Council meeting of 30th January 2019.
- **Statements of Common Ground:** These are agreements between the council and neighbouring authorities and other bodies, which set out how agreement has been reached on the content of the Local Plan and any remaining areas of disagreement.

1.214 A revised Local Development Scheme (LDS) has been published, highlighting when key milestones are likely to be reached.

Appendix 1: Statement of Representations Procedure

Havant Borough Local Plan 2036:

How to respond to the

Pre-submission consultation

Havant Borough Council has published the Pre-Submission Havant Borough Local Plan 2036 for public consultation. This follows approval of the Plan at Full Council on 30th January 2019.

The Pre-Submission Local Plan is the version of the Plan which the Council considers to be 'sound' having taken on-board extensive research, before it is formally submitted for examination. It takes account of the comments made during previous consultations to date and takes many of the suggested changes on board.

The Local Plan covers all of Havant Borough and sets out how the Borough's development needs will be met in a sustainable way. It includes a long-term vision and strategic priorities, a development strategy, together with thematic and development management planning policies. It identifies key projects which will deliver significant, comprehensive development and are crucial to achieving the vision, as well as allocating other smaller sites for housing and/or commercial uses.

The Pre-submission consultation and other consultations we are running at the same time

This leaflet sets out how you can respond to the consultation on the Pre-submission Local Plan and make your views known to the Inspector who will be undertaking the examination of the plan⁷. Stakeholders are invited to submit representations on the Havant Borough Local Plan 2036 Pre-Submission Draft for a period of six weeks, from Monday 4 February to 5:00pm on Monday 18 March 2019.

At the same time, the Council is running a number of other planning consultations. These are reviews of published documents needed as a result of the new Local Plan.

- The Draft Community Infrastructure Levy Charging Schedule
- The Local List of validation requirements
- The Statement of Community Involvement
- A review of the Old Bedhampton Conservation Area
- A review of how we'll consider parking for residential developments in town centres in our Parking Supplementary Planning Document

Where to view the consultation material

During the consultation, the Pre-Submission Local Plan and all of the supporting material is available on our website at www.havant.gov.uk/localplan.

⁷ This leaflet constitutes the Council's Statement of Representations Procedure, as required by Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations.

Alternatively, if you do not have access to the internet, you can come to the Public Service Plaza (see address below) from Monday to Friday between 9:00am and 5:00pm to see copies of all of the material.

How to submit your comments

Pre-Submission Local Plan

For the Pre-Submission Local Plan, the Government requires that comments are made in a certain way. The Council has prepared a form designed to help you with this, together with a guidance note which provides an explanation of the form and a completed example. You can access these documents at: www.havant.gov.uk/localplan.

Your comments **MUST** be received by **5pm** on **Monday 18th March 2019** and you **MUST** submit them using the prescribed form. Response forms are available to download as an interactive PDF document at www.havant.gov.uk/localplan. Alternatively, paper copies of the form are available (on-request) from the Havant Borough Council Offices at the address below.

It is recommended that you download and complete your comments on the interactive PDF form, then either email the completed form(s) to policy.design@havant.gov.uk (please enter the words 'Pre-Submission Local Plan comments' into the subject bar of the email), or post them to Planning Policy Team, Public Service Plaza, Civic Centre Road, Havant, PO9 2AX. **Letter or email comments that do not use the form will not be accepted.**

At this stage, unless you indicate you wish to appear at the examination you will not have the right to do so. Please note there is no guarantee you will be invited to the examination. The Inspector will decide who they wish to invite to each session. Any written representations will however, carry the same weight as any evidence presented at the Examination Hearings.

Other planning consultations

If you wish to respond to any of the other consultations, you can do that by email or by post. You **cannot respond to these consultations through the Local Plan form**. Please clearly indicate which document you are commenting on when you write to us. The period to respond to these consultations and the email or postal address are the same as for the Local Plan consultation and are set out above.

Please clearly indicate which consultation you are responding to when you write to us. Again, please make sure that we have received any comments regarding these consultations by **5pm on Monday 18th March**. Please email your comments to policy.design@havant.gov.uk or post them to Planning Policy Team, Public Service Plaza, Civic Centre Road, Havant, PO9 2AX. **Letter or email comments that use the Pre-Submission Local Plan form for these consultations will not be accepted.**

How to stay informed about future stages of the Local Plan's preparation

Following the consultation, there will be three key stages:

- Submission of the Havant Borough Local Plan 2036 to the Secretary of State for Communities, Housing and Local Government for independent examination
- The appointment of an inspector to examine the plan
- The adoption of the Havant Borough Local Plan 2036 by the Council.

Section 11 of the response form asks if you would like to receive notifications when these key stages take place. However, the Council will also keep the Local Plan webpage (www.havant.gov.uk/localplan) up to date with the latest news regarding the examination. We will also keep you updated if you follow the Council on social media.

Further comments and questions

The Local Plan webpages have details about the drop-in sessions that we are running across the Borough throughout the consultation period. If you remain concerned that the Local Plan does not meet the Government's tests of soundness or the Plan is not legally compliant, then you need to highlight this to the Inspector through the Pre-submission consultation. Council officers will be available at the drop-ins to help with any questions you have about the Local Plan and how to respond to the consultation.

If you have any further queries about the consultations we are running, please email us at policy.design@havant.gov.uk or call us on 023 9244 6539.