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By email to Jonathan Manning BSc
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through the Programme Officer

Enquiries to: David Hayward
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Email: david.hayward@havant.gov.uk
My reference: CR19
Your reference:
Date: 4 November 2021

Dear Mr Manning & Mr Hatfield

CLARIFICATIONS REGARDING INTERIM FINDINGS REPORT

1. Thank you again for providing the Interim Findings Report (document reference CR18) together with the offer of providing additional clarifications. As highlighted in the Council's letter of 4 November, being able to seek additional clarifications is helpful.

Policy KP3 – Hayling Island

2. Paragraph 22 of CR18 sets out that, given the Council has allocated all sites that it considers to be sustainable, it might be reasonable to conclude that the sequential test is met for this site. Nonetheless, it is concluded that in the absence of further detailed work that would be needed as part of a planning application to establish how the site can be developed safely, it is not possible to find the allocation sound.
3. It should be noted that Beachlands is already allocated in the development plan, specifically in the Havant Borough Local Plan (Allocations Plan)¹. Specifically, Policy HY2, site reference HY45 allocates Beachlands for 125 new homes together with leisure and tourism development. As you'll be aware, flood risk policy has not changed substantively for many years, through evolution of the NPPF. As such, given that the site is already allocated, can an extremely similar policy in the Havant Borough Local Plan (CD01) also be considered sound on the same basis?
4. Notwithstanding the above, it would be helpful to clarify the level of detail that would be required in order to demonstrate that Southwood Road, Beachlands, Eastoke Corner and West Beach can be made safe for their lifetime. From the conclusions reached, it could be inferred that it is necessary for a Flood Risk Assessment (FRA) to be produced. As you are aware of course, that is a standard assessment to support a planning application. In order for an FRA to be prepared, a scheme would need to be designed as well in order to be assessed, a scheme which may well not represent the final scheme design. It is considered that this would be a high level of evidence to support an allocation and, as such, would like to clarify

¹ This is available on the Council's website at <https://cdn.havant.gov.uk/public/documents/Adopted%20Allocations%20Plan%20July%2020214%20-%20Copy.pdf>, see pages 63-64.

whether this is indeed necessary or if a more proportionate level of evidence could be provided.

5. Finally, on this subject, paragraph 21 highlights that the conclusions in that section of CR18 relate to West Beach. Paragraph 25 though relates specifically to Southwood Road, Eastoke Corner and Beachlands. Following the stage 1 hearings, the Council suggested a change to the plan to specifically highlight that the emerging Coastal Defence Strategy should be in place prior to authorising any implementation of the West Beach allocation. Particularly given that the allocation for West Beach does not include residential development, the Council would appreciate confirmation as to whether the conclusions in paragraph 23 regarding soundness apply to West Beach.

Sustainability Appraisal

6. The Council has prepared a scope of the work intended to be undertaken to address this concern. This is included as an appendix to this letter. The work that has been scoped out could be provided as an addendum to the Sustainability Appraisal, which itself has been updated at various stages up to this point. It would be helpful to clarify if the proposed work would satisfy be likely to satisfy the concerns expressed regarding the Sustainability Appraisal.

Hayling Island – Transport

7. As you are aware from the Hayling Island Transport Assessment (EB03) and its addendum (EB04), there is a permanent traffic counter on Hayling Bridge and Bluetooth journey time monitoring. As such, the various datasets are already available to enable summer time sensitivity modelling to take place. Nonetheless, following further consideration of the points that you have raised in CR18, the Council would like to take further time in order to assess the appropriate methodology to address the concern that you've raised. In particular, as part of that process, the Council would like to engage with stakeholders in that process. As such, this will take longer to scope out the work required.
8. The Council would still appreciate the opportunity to clarify whether the scope of works would satisfy the concerns raised regarding this matter in due course.

Five year supply update

9. Following the conclusions regarding housing supply in the Interim Findings Report, the Council has updated the Five Year Supply Update. This is necessary in order to clarify the five year position for development management purposes. This has been added to the Examination Library with the reference EB36d. Following the changes to supply, the Borough now has a 3.9 year housing land supply. As you're aware, other examination library documents would typically need to be updated following a change in supply. The Council will undertake those updates when the way forward with the Local Plan examination is clearer.
10. The Council appreciates the opportunity to seek clarifications on the matters above and looks forward to your reply in due course.

Yours sincerely

David Hayward

Planning Policy Manager