

Library Ref: TP02

# Approach to site selection

(A topic paper supporting the examination)

March 2021



# Introduction

1. This paper gives an overview of the Local Plan's development allocations, providing a narrative of how it evolved. It is intended to aid the Inspectors and interested parties in understanding why the Local Plan puts forward the approach that it does. To do that it signposts to the relevant evidence base, Local Plan sections and relevant statements of common ground with key stakeholders. It does not introduce new information or evidence.
2. This is one of a series of topic papers provided by the Council to support the Local Plan's examination. It is highly recommended that topic papers are read together as the nature of local plans is that topics overlap.

## Purpose

3. Paragraph 23 of the National Planning Policy Framework indicates that strategic policies should provide a clear strategy for bringing forward land to address objectively assessed needs. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area. The purpose of this Topic Paper is therefore to set out the Council's approach to the identification and assessment of sites, and their allocation in the emerging Local Plan.

## Site assessment

4. As set out in the Strategy Topic Paper, the environmental constraints of the Borough make it challenging to meet the need for housing. This is evidenced in more detail in the Housing Constraints and Supply Analysis (EB39) and summarised in the Strategy Topic Paper (TP01). This is also set against a housing need that has risen throughout the course of the Local Plan's development from 450 per year to 504 as well as the need to extend the plan period from 2036 to 2037, requiring a further year of housing need to be accommodated. The Council considers that all sites which are suitable for housing development have been allocated in the Local Plan.
5. The Council put a rigorous site assessment process in place to screen sites for high level constraints in order to provide a thorough assessment of their suitability. This reflected the need to 'leave no stone unturned' in finding sustainable housing sites to meet a high level of housing need from an early stage in the plan's preparation.
6. The Allocation Methodology (EB43) provides a summary of the methodology used to identify whether a site is suitable for development, and whether it should therefore be allocated in the Havant Borough Local Plan (HBLP). This is considered in further detail below.
7. The Council undertook 'Calls for Sites' in 2016 and 2017 to understand which sites were available for development in the Borough. Sites were promoted for development through site submissions from developers at the formal Regulation 18 and 19 consultation stages process, as well as informal site submissions and the development management process. Extensive contact was made with agents and housebuilders who had been active in the Borough.
8. In 2016, a specific approach was also made to the landowners or agents of all sites allocated in the Havant Borough Local Plan (Allocations) to ascertain their intentions for their site. The Regulation 18 consultations were extensively promoted online through social

media campaigns and mailouts amongst other means as set out in the Consultation Statement (CD22). These elicited sites to be submitted for consideration through those consultations and the Council considered those sites.

9. All sites promoted for housing were then reviewed through the Strategic Housing Land Availability Assessment (EB42) to determine whether they were suitable for development based on a high-level analysis of site constraints. An assessment of their deliverability and developability was also made.
10. Potentially suitable sites were then taken forward for assessment through the Sustainability Appraisal (SA) which considered the social, environmental implications of development on each of the sites against each of the objectives in the SA. It recommended that a number of sites were not taken forward for inclusion as an allocation in the Local Plan due to their “strong negative effects” on sustainability objectives. However, it confirmed that the vast majority of sites should be taken forward, subject to appropriate mitigation measures being recommended in the site allocation policy.
11. The Strategic Flood Risk Assessment (SFRA) (EB33) was also used to assess potentially suitable sites. The starting point was to assume that only those sites where flood risk could be avoided should be taken forward in line with national guidance on applying the sequential test for the Local Plan. The sites affected by Flood Zones 2 and 3, and/or raised by the Environment Agency as of a concern were reviewed further in terms of flood risk.
12. Where there was no, or insufficient evidence to demonstrate the development would be safe in flood risk terms, the site was discounted in the SHLAA. This applies to a number of the Omission Sites which were previously identified for allocation in the Draft (Regulation 18) Local Plan.
13. Sites were also subject to a site screening process. The Summary of Site Screening Work (EB44) provides an overview of the constraints affecting each site including heritage, ecology, archaeology, environmental health, and flooding and drainage. Where certain constraints have been highlighted, the relevant assessment(s) e.g. Contamination Land Investigation report has then been identified as a requirement in the allocation policy. The site screening was principally used as a way of informing the allocation policies themselves rather than to exclude sites. The process identified the constraints that affect the sites, the information needed to support a planning application and the kinds of mitigation measures that may be required.
14. Whilst the above sets out the site assessment in a broadly chronological order (albeit for practical reasons some assessments were done together), it should be acknowledged that the Council has continued to assess the suitability of sites throughout the plan’s preparation, including through Sustainability Appraisal at every stage. This is reflected in the development of the Council’s evidence base, and in particular infrastructure and transport for further development on Hayling Island. This is discussed in further detail below.
15. Following the Draft Local Plan (Regulation 18) stage, the Council further considered the principle of a number of allocations<sup>1</sup> as a result of the points raised during the consultation. A number of sites promoted at Regulation 18 (Draft Local Plan stage) were also included in the 2019 Pre-Submission Local Plan (CD09). A site promoted through the 2019 Pre-

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<sup>1</sup> See Appendix 3 of the [CD22 Consultation Statement](#)

Submission Local Plan consultation was subsequently included as a housing allocation in the Submission Local Plan (CD01).

16. On this basis, the Council considers that the development allocations identified in the Submission Local Plan (CD01) provide for a justified and effective strategy to positively address objectively assessed needs in Havant Borough.

## Contentious sites in the Local Plan

17. A local plan can be an emotive topic. There are several sites and proposals that have attracted significant controversy which are explored in more detail below.
18. These sites were generally considered by the inspector in the Council's last local plan and were rejected for allocation. This was the Havant Borough Local Plan (Allocations), adopted in 2014, which sat alongside the Havant Borough Local Plan (Core Strategy), adopted in 2011. Crucially, the Allocations Plan was considered as an implementation plan of the Core Strategy. The Housing target in the Core Strategy derived from that in the South East Plan. As such, the two plans as a whole do not comply with NPPF's stated requirement to meet the full objectively assessed need for housing. This was shown to be the case through an inspector's decision in 2016 (Appeal Ref: 3145929). This in and of itself is one reason why the Council prepared a Local Plan Housing Statement which identified a number of sites for 'early release' whilst the Havant Borough Local Plan was in production – in order to boost the supply of housing.
19. There were several sites rejected through the Site Allocations Plan Inspector's report which have since had to be re-considered and allocated as part of the Havant Borough Local Plan. The previous inspectors report did not comment that any of the sites were considered unsuitable for development, simply that their constraints warranted their non-allocation. Given the approach at the time of essentially considering the most suitable sites available to deliver a housing target, this was entirely logical. The section of that report which address those sites are included at Appendix 1.
20. As a clear example, the site known as 'Land at Selangor Avenue' was rejected through the Inspector's report for the Allocations Plan in 2014. Nonetheless, it was subsequently included in the Council's Local Plan Housing Statement and received planning permission in 2018. The site was included in the 2019 Pre-Submission Havant Borough Local Plan (CD09) but has since been removed as the development is nearing completion. The mere fact of a site not being allocated through a previous local plan does not show that it is not capable of providing sustainable development.
21. The Housing Constraints and Supply Analysis (CD39) clearly sets out the constraints which the Borough faces and the limited supply of land for development. With less constrained sites having been built out through previous local plans and increasing housing need, there is a need to identify more constrained and controversial sites for development.
22. Nonetheless, in seeking to meet the need for housing, it has been necessary to look carefully at all available sites to meet the need for housing, including sites which have previously not been allocated.

### **Hayling Island**

23. The 2014 Allocations Plan highlighted that future development on the island could be constrained by flood risk and/or highway impact. Nonetheless, following extensive analysis, several sites are allocated on Hayling Island in the Submission Local Plan (CD01). Whilst

both the proposed local plan allocations and planning applications on sites have attracted objections, most objections to the Local Plan have been regarding the strategic decision of whether Hayling Island is suitable for new development with a particular focus on infrastructure. This is understandable particularly for transport infrastructure given that there is only one road connecting the island to the mainland.

24. It was clear through the consultation responses to the Draft Local Plan Housing Statement that there was significant concern regarding the capacity of the island's infrastructure network. As such, the adopted Housing Statement identified sites on the mainland where the Council would support the principle of development in advance of the new Local Plan. By contrast, none of the sites on Hayling Island were identified as being suitable for early release. The Housing Statement identified that further analysis of the island's infrastructure network was needed as part of the preparation of the Local Plan to confirm its potential for sustainable development.
25. The Council followed through on this approach, refusing an outline planning application on Rook Farm in April 2017 (reference APP/17/00007) on several grounds, including the failure of the development to demonstrate it would constitute sustainable development as it did not adequately address the infrastructure requirements for the development by itself and in combination with other sites on Hayling Island. Specific infrastructure highlighted included highway capacity and the single access onto the island, flooding, healthcare, education and the provision of utilities.
26. The Council has considered the infrastructure constraints facing Hayling Island carefully though the plan's development with a focus on those infrastructure areas where the island's nature constrains development and mitigation solutions. A particular focus has been given to transport. A Transport Assessment (TA) was prepared specifically for Hayling Island (EB03) which sits alongside the TA for the mainland. This uses a microsimulation highway model rather than the Sub-Regional Transport Model which was used for the mainland TA. Microsimulation is more appropriate to the nature of the island's highway network and the granularity of detail that it can offer is higher. There is extensive explanation of the model in the Hayling Island Transport Assessment (HITA) (EB03) and its Addendum (EB04).
27. The HITA (EB03) supported the 2019 Pre-Submission Local Plan (CD09) which was approved by the Full Council in January 2019. As part of that decision, the Council committed to further work to clarify the mitigation package needed to accommodate development, prior to the submission of the Local Plan.
28. Further modelling was then undertaken in order to clarify the mitigation needed for the Local Plan's development on the island. This is set out in the HITA Addendum (EB04).
29. Following the consultation on the Draft Local Plan Housing Statement and to engage with local residents groups on the emerging Local Plan, the Council formed the Hayling Island Infrastructure Advisory Committee. This was a non-constituted group which included the Council, Hampshire County Council, local residents' groups and other organisations as necessary, depending on the agenda items to be discussed. The Terms of Reference for this Group can be found in Appendix 5 of the Consultation Statement (CD22).
30. Meetings were held regularly, particularly in 2017 and 2018 as the local plan was coming together. Two further meetings were also held in November 2019 regarding the HITA Addendum specifically.
31. The HITA Addendum was approved on 20 February 2020. It was subsequently called in for scrutiny which took place on 10 March 2020. The decision to publish the addendum was

confirmed on 16 March 2020. The call-in of the original decision was only the second time that the power has been exercised, which reflects the controversy of the proposals. Nonetheless, the Council at all times followed its constitution in preparing the addendum.

32. The Council has undertaken extensive discussions with Hampshire County Council (HCC), as local highway authority, as part of the preparation of the HITA and its Addendum. As part of the submission documents, the Council has submitted a Statement of Common Ground with HCC. This confirms that there was sufficient engagement and consultation with HCC on the HITA and its Addendum. The two authorities agree on the proposed highway mitigation listed in the Hayling Island Transport Assessment Addendum, and that they demonstrate that the level of development is capable of mitigation and does not preclude other schemes, designs and other modes being considered.
33. The analysis that has been undertaken is at a level of detail which it is considered is over and above what is generally needed in order to support Local Plans. This has led to the production of a transport model which can be used by developers to prepare Transport Assessments to support planning applications.
34. At the time of writing, there is clear interest in the sites identified on Hayling Island. As such, most of them are not only considered suitable for allocating but that they can help to meet the need for a five year supply of housing land:
  - H27 (Rook Farm) – outline planning application submitted but refused in 2017 on multiple grounds. The site promoter (Gladman) has remained engaged in the local plan's development, submitting responses at all stages. Whilst a new planning application has not yet been submitted, it is considered possible to do so in a short timeframe. Site is not included in the five year supply out of an abundance of caution given the need to find mitigation land (see further commentary below).
  - H28 (Fathoms Reach) – clear site promotion with contact made by the landowner (Taylor Wimpy) with properties on Fathoms Reach regarding access into the site. As such, the site has been included in the five year supply.
  - H29 (Land North of Sinah Lane) – planning application submitted, recommended for approval but Development Management Committee delayed, due to the COVID 19 pandemic. An appeal was subsequently lodged against non-determination. The Development Management Committee subsequently concluded that should they have been able to determine the application, they would have resolved to grant planning permission. A replacement application has been submitted and is due to be considered by the committee on 10 March 2021. As such, the site has been fully included in the five year supply.
  - H31 (Manor Nurseries) – a planning application has been submitted and is awaiting determination. As such, the site has been included in the five year supply.
  - H32 (Pullingers, Elm Grove) – planning permission has been granted. As such, the site has been included in the five year supply.
  - H33 (Land rear of 12-21 Mengham Road) – a previous planning permission has since expired. This site is not considered deliverable and so is not in the five year supply.
35. The Council considers that development on Hayling Island is needed in order to meet the need for housing. This does require extensive mitigation packages, particularly for transport infrastructure. Nonetheless, these have been scoped, costed, included in a TA and development shown to be viable. Ultimately It is not possible to meet the need for housing in the Borough without development on Hayling Island.

## Land North of Long Copse Lane

36. The Site Allocations Plan Inspector's report in 2013 determined that this site should not be allocated. It was, however promoted to the Council through the 2016 'Call for Sites' for the development of the Draft Local Plan Housing Statement. It was included in the adopted Local Plan Housing Statement. A Development Consultation Forum was then held on 27 March 2018<sup>2</sup>.
37. The Council certainly acknowledges that the site is constrained. This is shown through the level of detail that is contained in the allocation itself as matters that need to be considered and satisfied in any development scheme.
38. It is pertinent to draw out some noteworthy constraints that face the site. It is closer than any other allocated site to the South Downs National Park. The development will clearly have an impact in landscape terms and there is a clear harm that will arise from the development, as identified in the Sustainability Appraisal. The Council has engaged with the South Downs National Park Authority and a number of criteria in the allocation were included at the request of the National Park Authority to ensure that landscape harm, particularly to the setting of the national park is minimised. A statement of common ground has been signed with the National Park Authority (SCG06) who raise no objection to the allocation.
39. The site is also sensitive in ecological terms, most noteworthy through the presence on site of Bechstein's Bat with a maternity roost likely to be present. A development requirement has been included in Policy H8 to require a woodland buffer and indeed any other mitigation measures. It should also be reiterated that the plan should be read as a whole and Policy E15 extensively addresses impacts on European Protected Species. The approach to European Protected Species has been developed in consultation with Natural England and in their 2020 representation (reference R287 C03), Natural England specifically highlight support for Policy E15.
40. The highway access to the site is clearly constrained, along a narrow road with a sharp bend. The site is located on the edge of the Emsworth settlement and is not particularly accessible to local shops and services nor public transport. Although no two sites are ever the same, there are other sites allocated in the plan which could be said to have a similar level of accessibility to shops, services and public transport. The Council has actively encouraged the applicant to engage thoroughly with HCC as local highway authority in this regard. HCC have not objected to the principle of the site either through any of the local plan consultations, nor through the Development Consultation Forum that was held regarding the site.
41. There is clear developer interest through the promotion of the site by Land and Partners, with public consultation being held alongside the Developer Consultation Forum. It is expected that outline planning approval will be sought. As such, the site is considered deliverable and housing completions could take place within five years. Nonetheless it is acknowledged that this is a large and complex site where initial approval will be sought in outline form. As such, sufficient account has been taken of the need to seek outline planning approval, to put the site on the market and complete a transaction and seek

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<sup>2</sup> See <https://www.havant.gov.uk/development-consultation-forums>, specifically Forum 43.

reserved matters approval along with pre-commencement condition discharges and initial construction. As a result, it is expected that only part of the site will be delivered within five years.

42. Overall, the Council has considered the constraints on the site through the site screening and assessment process and the Sustainability Appraisal. Solutions are needed in order to appropriately mitigate these constraints to make development on the site acceptable. However, whilst constrained, it is not considered that any of the constraints are such that they could not be overcome through a high quality development proposal with the necessary mitigation measures.

## **Land South of Lower Road**

43. As with Land North of Long Copse Lane, this site was rejected in the Inspector's report for the Allocations Plan (2014) and was identified as an early release site in the Local Plan Housing Statement (2016), as the first step in preparing the new Local Plan.
44. The site has been promoted throughout the Local Plan's development, originally by Lucken Beck and more latterly by Bargate Homes. A Development Consultation Forum was held on 23 May 2018<sup>3</sup>.
45. The Council acknowledges that this is a constrained site. Heritage is a principal consideration with the site being close to several heritage assets including listed buildings and adjacent to the Old Bedhampton Conservation Area. At the start of the Local Plan's development, the Conservation Area Appraisal was not up to date. Local residents initiated and undertook an updated appraisal which fed into a formal review of the Conservation Area undertaken by the Council.
46. This process concluded in September 2019 with the new Conservation Area boundary approved. Most notably, this included a satellite character area which included Old Manor Farm, located to the west of the main conservation area. The allocation essentially sits in between the satellite and main parts of the conservation area and immediately to the north west of the allocation. Any development will therefore need to preserve or enhance the setting of the Conservation Area. The Council's Conservation Officers have been closely involved with the development of the local plan since its inception. A detailed site screening was undertaken of this site, considering the heritage value possessed by the site and its surroundings.
47. The Council has also engaged heavily with Historic England on both the allocation and the Conservation Area review. Historic England have not objected to the site's allocation, subject to the strict adherence to several safeguards included in the allocation policy (SCG02). Overall, it is considered possible to design a scheme that causes 'less than substantial harm' to nearby heritage assets that would be outweighed by the development's benefits.
48. A Definitive Map Modification Order application has been received by Hampshire County Council as the relevant rights of way authority. This relates to Narrow Marsh Lane. This has not been referenced within the Submission Local Plan (CD01) as HCC has not yet reached a view on the matter and is not likely to be able to prior to the plan's adoption. Nonetheless,

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<sup>3</sup> See <https://www.havant.gov.uk/development-consultation-forums>, specifically Forum 44.



should the route be added to the Definitive Map as a right of way, it is considered that it would be possible to incorporate this within a development scheme for the site.

49. The site is also clearly constrained by highway and access matters. Whilst it is relatively accessible by public transport, the access into the site is not ideal. There are several sharp bends with very limited visibility and no footway on the highway leading to the site.
50. Following the Development Consultation Forum, a full planning application (APP/19/00427) for 50 homes was received on 19 April 2019. Planning permission was refused on 26 March, principally related to the harm caused to the Old Bedhampton Conservation Area. An appeal (reference 3259067) was lodged against this planning application and the inquiry sat from 2 to 5 February 2021. At the time of writing, a decision has not been issued.
51. Following the initial refusal of planning permission, a replacement planning application (reference APP/20/01031) was received on 10 November 2020. This was an amended scheme with new homes placed slightly further away from the satellite character area of the Old Bedhampton Conservation Area. This application was refused on the same grounds as the original application.
52. The refusals of planning permission on the site are clearly noteworthy. However the reasons of those refusals were on specific grounds related to the impact of the scheme in question on the conservation area, and do not represent an overriding constraint to the delivery of development on site. As such, the Council continues to accept the principle of the development on the site. This was confirmed by the fact that the site remained in the 2020 Havant Borough Pre-Submission Local Plan (CD08) when changes were approved by the Full Council in September 2020 even after the refusal of planning permission in March 2020.

## Housing Supply

53. The Five Year Housing Land Supply Update (EB36) shows that the 2020 Housing Delivery Test results indicated a measurement of 72%. The Council's Housing Delivery Action Plan (EB37) assesses the causes of under-delivery of housing in Havant borough in recent years. It highlights the impact of nutrient neutrality on housing delivery over the past 18-24 months, as well as the macro-uncertainty associated with the UK's exit from the European Union. It also acknowledges the impact of the current pandemic which is likely to have impacted completions over the past monitoring year (2020-21). All of these are factors which are out of the Council's control.
54. The Council made it clear that Havant borough was 'open for business' at the start of the Local Plan. This was reflected in the publication of the Local Plan Housing Statement at the start of the plan's process has meant that the Council has seen planning applications come forward on a number of the 'early release' sites, notably that of Selangor Avenue (reference APP/16/00774) and Southleigh Park House (reference APP/17/00863). Several others had submitted an application or were in pre-application discussions when the Housing Statement was rescinded as part of the approval of the Pre-Submission Local Plan on 30 January 2019. However, Selangor Avenue is the only site to have commenced.
55. The Action Plan highlights the significant steps which the Council has taken to significantly boost the supply of housing, including addressing the issue of nutrient neutrality. The Council is being extremely proactive in providing an early strategic mitigation scheme through the launch of Warblington Farm. This in turn has enabled the Council to submit the

Local Plan for Examination which once adopted will provide developers with the necessary certainty to move forward with allocations in the Submission Local Plan.

56. The Council is accepting the principle of development on proposed allocations in advance of the Local Plan's adoption. This is necessary in order to restore and maintain a five year supply. That is evident from the Lower Road Inquiry as well as the grant of planning permission (reference APP/19/0007) at Camp Field (Policy H18), Forty Acres (reference APP/18/00450) (H14) and at Land rear of 15-27 Horndean Road (Policy HX) (reference APP/19/00768). In the latter case, the Council's estate was used as mitigation to overcome ecological constraints on the site. The Council, as landowner, sought suitable compensation for this of course as direct subsidy of development cannot take place. However this demonstrates the proactive approach that the Council can and is taking in order to realise development. It is expected that other sites will need to use the Council's estate in order to overcome development constraints.
57. Despite the Council's endeavours to boost housing supply, the Five Year Housing Land Supply Update (EB36) shows that the Council is only able to demonstrate a supply of 4.2 years. In this respect, the Council is mindful that there is a need for the Local Plan to identify a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement in the context of paragraph 73 in the NPPF. This is not currently possible given the current need to apply a 20% buffer.
58. There are a number of additional housing sites which have the potential to boost the supply of housing in the short term, but are not currently included in the Council's five year supply position. These largely relate to current or recent planning applications or emerging site allocations where there is clear developer interest:
- H13 | Fowley Cottage – allocated for 20 dwellings. Current application (APP/20/00376) for 9 dwellings (revised scheme), following dismissal of 7 dwelling unit scheme at appeal (reference 3252953).
  - H27 | Rook Farm – allocated for 360 dwellings. Continuing dialogue with the developer since refusal of planning permission (APP/17/00007) in 2017. Timescales of delivery dependent on mitigation, but the site has the potential to provide 75 dwellings within the first five years (see also commentary in relation to Hayling Island as a contentious site).
  - H36 | Former SSE site – allocated for 80 dwellings. Current application (APP/20/00658) for mixed use development including 175 apartments.
  - Land south of Bartons Road – the Council's Development Management Committee resolved to grant planning permission subject to legal agreement (APP/20/00761) for a 64 bed care home on 25<sup>th</sup> February 2021. Contribution to land supply is equivalent to 36 units based on a 1.8 average of adults per household.
59. The Council has purposefully taken a precautionary approach excluding the above sites in its housing land supply, and only including sites where there is clear evidence that there will be completions on sites in the first five years.
60. The tightly constrained nature of the Borough and finite amount of undeveloped land means that the development strategy is focused on town centre regeneration and the delivery of the Southleigh strategic site (see Strategy Topic Paper (Library Ref TP01)). Significantly however, the complex nature of these sites means that housing completions on cannot reasonably be expected within first five years. The Council's housing trajectory,

which is included as Appendix 1 of the Strategy Topic Paper (TP01) shows that there is a steady increase in housing delivery from 2026/27 onwards and gradually decreases from 2031/32 onwards accordingly.

61. Completions figures for the 2020/21 financial year together with outstanding planning permissions as of 1 April 2021 will be available in the late spring or early summer<sup>4</sup>. Table 2 will be updated once this dataset is available.

## Omission sites

62. Whilst the merits of Omission Sites are not normally discussed at Examination, it is recognised that it is a main issue (CD19) that a number of representors consider that additional sites should be identified to provide additional flexibility and to address unmet needs from neighbouring authorities. The Council considers this reflects the reduced buffer of 340 homes included in the 2020 Pre-Submission Plan (CD08).
63. All of the sites that are allocated in the Havant Borough Local Plan have planning constraints that will affect their development. The Council has looked to identify suitable mitigation measures whenever possible in order to overcome constraints. Any site which it is considered suitable for development has been allocated.
64. Nonetheless, there is a small number of sites where the Council considers that it has not been demonstrated that constraints can be satisfactorily overcome, and as such those sites have not been allocated in the plan. These are set out in the reports summarising the Regulation 19 consultations in both 2019 and 2020. These are set out below and shown for illustrative purposes in figure 1.

SHLAA reference	Site name	Potential site yield*	Commentary	Representation reference
HB15	Southmere Field	65	Discounted by the SHLAA for the following reason:  <i>"Gas pipeline and flooding constraints provide a site area that would not be suitable in the context of the built form and landscape."</i>	R258 C01 supporting document 1
HY5 & HY11	Land North of Tournbury Lane & Hayling College Playing Fields	150	HY5 was included in the 2019 Pre-Submission Local Plan under Policy H30 (CD09) but was proposed for deletion in the 2020 Pre-Submission Local Plan (CD08). It is discounted in the SHLAA for the following reason:  <i>"No longer available for development."</i>  This reflects R233 C01 which highlights a restrictive covenant and prevents development without written agreement of the Tournbury Woods Estate.	R111 20C01

<sup>4</sup> The exact date varies each year depending on, for example, the number of site in development.

SHLAA reference	Site name	Potential site yield*	Commentary	Representation reference
			<p>HY11 was assessed in the 2019 SA (CD10) which does not recommend the site for inclusion in the 2019 Pre-Submission Local Plan. This is due to the harm caused by the loss to playing field residential development, and that Sport England would object to the proposal.</p> <p>It should be noted that HY5 was also promoted separately (R110 C01) as an allocation in its own right in response to the 2019 Pre-Submission consultation.</p>	
LP127 (central)	Land east of A3(M)	120	<p>Discounted by the SHLAA for the following reason:</p> <p><i>“Site is not suitable for residential development due to its isolated nature. It is better suited for other uses.”</i></p> <p>This reflects the Constraints and Supply Analysis which highlights whilst there are a few areas within the A3(M) corridor which are not covered by high level constraints, most have limited access or are relatively remote from the services of existing areas.</p> <p>The Council is currently considering an outline planning application for the site (reference APP/20/00441) for up to 120 dwellings with all matters reserved except for access.</p>	R265 20C01
EM8	Land Rear of 15-27 Horndean Road	16	The site was allocated through the changes to the Havant Borough Local Plan in 2020 (CD08). The site has since been granted planning permission (reference APP/19/00768).	R235 C01
HY46	Selsmore Road	17	<p>Discounted by the SHLAA for the following reason:</p> <p><i>“The SFRA shoes the site to be at risk of flooding in 2115.”</i></p>	R245 C01
HB63	Kingscroft Farm	160	<p>Employment allocation (BD19) in the Allocations Plan (2014). Discounted by the SHLAA for the following reason:</p> <p><i>“Flood Zone 3 in 2115 in on SFRA.”</i></p>	R242 C01
WV22	Phase 8 of West of Waterlooville Major Development Area	210	Outline planning permission granted in 2012 (ref APP/12/00008) as part of development of approximately 2550 dwellings in both Havant Borough and Winchester City LPA areas.	R244 C02

SHLAA reference	Site name	Potential site yield*	Commentary	Representation reference
HB65	Land at Portsdown Hill	Not specified	<p>Discounted by the SHLAA for the following reason:</p> <p><i>“Part of the site has been developed and the land remaining cannot be developed due to a S106 agreement and a high pressure gas main.”</i></p> <p>However, the land would be included within the settlement boundary as defined by Policy E3 in the Submission Local Plan.</p>	R260 C02
HB67	South of Wade Lane	Not specified	<p>Discounted by the SHLAA for the following reason:</p> <p><i>“Site previously promoted for open space in connection with land at Portsdown Hill reference HB65. Site unsuitable for housing given its inclusion within the Chichester Area of Outstanding Natural Beauty.”</i></p>	R260 C01
EM5/5a	Westwood Close	36	<p>Planning permission (reference APP/18/00672) was refused for 36 dwellings in 2019.</p> <p>Discounted by the SHLAA on flood risk grounds. The site is safeguarded for the River Ems Flood Alleviation Scheme under Policy IN1 of the Submission Local Plan.</p> <p>The land has also been designated as a Local Green Space through the Emsworth Neighbourhood Plan.</p>	R266 C01
WV70	Hazleton Wood	Not specified	<p>Discounted by the SHLAA for the following reason:</p> <p><i>“The site is designated as a SINCE. This together with a Woodland Protection Order and lack of clear access potential leads to a low prospect of the site being developable.”</i></p>	R270 C02
EM41	South of Havant Road (often referred to as Horses Field)	Residential or care-home / retirement living	<p>Discounted by the SHLAA for the following reason:</p> <p><i>“Site is within the Chichester Harbour Area of Outstanding Natural Beauty and development of this site would have an adverse impact on the landscape.”</i></p>	R322 20C01

SHLAA reference	Site name	Potential site yield*	Commentary	Representation reference
			<p>The site was erroneously identified in the 2019 Consultation Summary as a site promoted for development, but was submitted in the 2016 Call for Sites and the 2018 Draft Local Plan consultation (CD22 Appendix 3).</p> <p>Most recently, it was also indirectly promoted for residential or care-home / retirement living uses in representation reference R322 20C01. It was not therefore specifically highlighted as an omission site in the 2020 Consultation Summary (CD19).</p>	
-	Land at Tournerbury	n/a	Proposed as a wedding venue site	R223 20C1

\*please note that due to these sites not being allocated, the Council does not necessarily endorse the yield specified as a suitable yield for the site. These are generally provided by site promoters and are included for illustrative purposes to indicate a potential broad scale of development.

65. In addition, the following extensions to existing sites were proposed in response to the 2019 Pre-Submission consultation:

SHLAA Reference	Site name	Additional potential site yield (as extended)	Commentary	Representation reference
HB6b	Littlepark House	Not specified	<p>Extension of the site allocation Policy H22 to 5.3ha.</p> <p>Discounted by the SHLAA for the following reason:</p> <p><i>"The site is covered by trees which are protected and designated SINC."</i></p>	R226 C01
HB3 (Ext)	Land at Palk Road – Site extension	40 (55)	<p>Palk Road is allocated through policy H24 for 15 units. Proposed extension to increase capacity to 55.</p> <p>Discounted by the SHLAA for future flood risk reasons.</p>	R242 C01

\* please note that due to these sites not being allocated, the council does not necessarily endorse the yield specified as a suitable yield for the site. These are generally provided by site promoters and are included for illustrative purposes to indicate a potential broad scale of development.

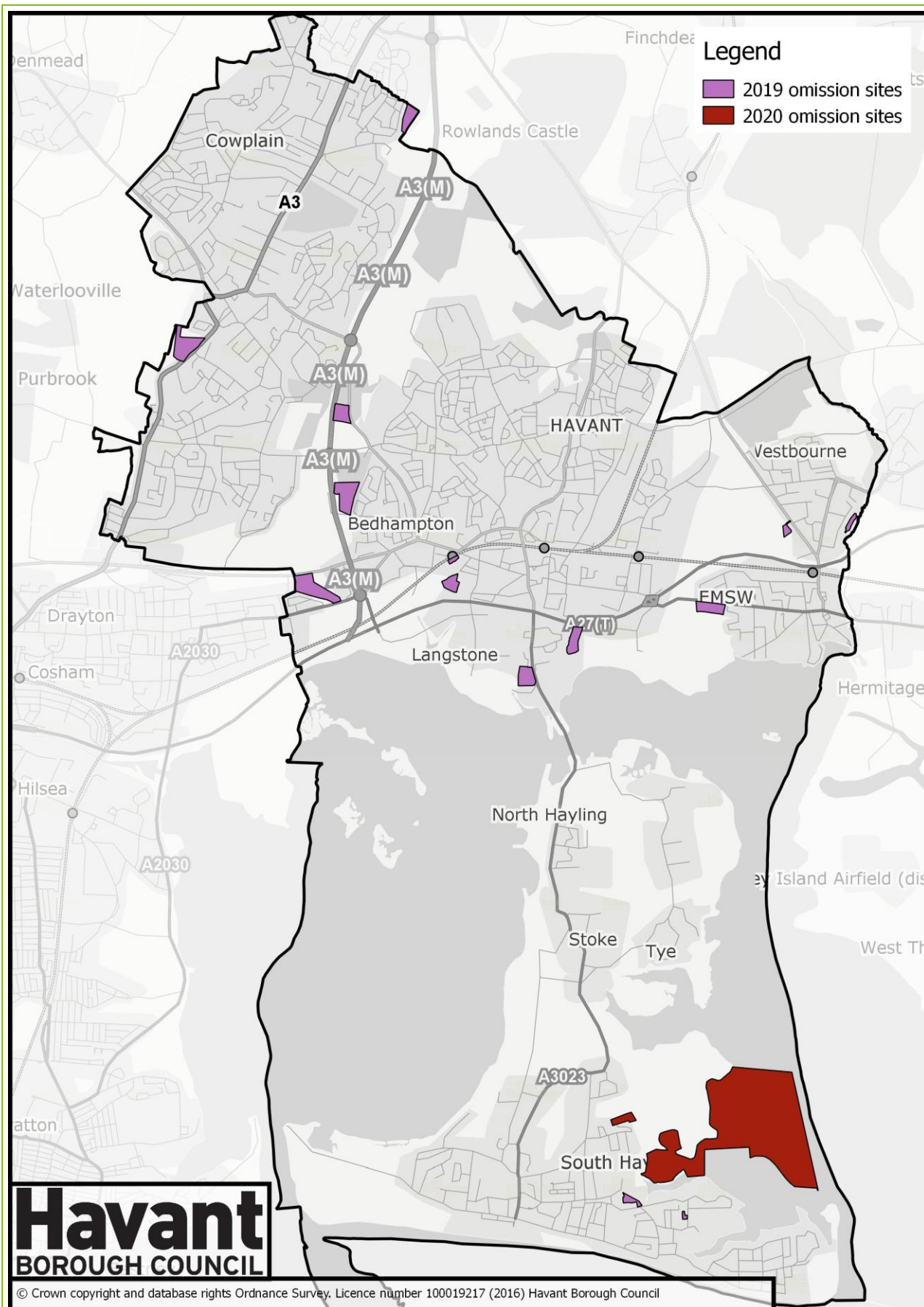


Figure 1: omission sites that were submitted through the two Regulation 19 consultations.



# Appendix 1: Extract from the Report into the Havant Borough Local Plan (Allocations) (7 July 2014)

## **Issue 5 – is there a requirement to allocate more sites and/or have any sites been wrongly excluded from the Plan?**

61. Section 3 of this report finds no requirement for additional sites to be allocated in order to deliver the vision for growth set out in the CS. However representations have been made to promote a number of alternative or additional sites. Some were put forward at too late a stage in the preparation of the Plan to be considered properly. Others were included in early versions of the Plan but not allocated in the submission version. The Council has made it clear that these sites were assessed against the same criteria as the allocated sites, with information updated and sustainability appraisal undertaken as the Plan progressed. The justification for non-allocation of some sites was considered in detail through written submissions and at the examination hearings.

### *Emsworth - UE2(b): Selangor Avenue*

62. It is common ground that one of the reasons for discounting this site, relating to the presence of a gas pipeline, can be overcome. It is therefore accepted that the gas pipeline is not a justification for non allocation of this site. However the site was also assessed in the SLG and the Gaps Review. The former does not refer specifically to site UE2(b). However in assessing site UE2(a), which lies immediately to the north of the A27, the Gaps Review notes that the gap between Havant and Emsworth is already narrow but that the landscape character is open, despite the presence of the A27 running through the gap. This makes it clear that the gap being considered comprised UE2(a) and the open land to the south, which is known as site UE2(b). The SLG is very clear in concluding that both areas of land need to be kept open in order to maintain the Havant-Emsworth gap.

63. This conclusion is reinforced by more recent assessment in the Gaps Review, which states that UE2(b) contributes to the separation between the adjacent urban areas by representing a large proportion of the gap between Emsworth and Havant. It is clear that both the SLG and the Gaps Review have considered the two UE2 sites as one gap which serves to visually separate Havant and Emsworth. Both conclude that the two sites together should remain undeveloped so as not to undermine the function of this gap.

64. I have taken account of all other matters raised in support of site UE2(b), including proposals for flood alleviation, the surface water drainage strategy and concerns regarding the consultation process. However I am satisfied that the non allocation of the site is supported by robust evidence and that public consultation has been in accordance with the Council's Statement of Community Involvement.

### *Emsworth - Site UE11: Land West of Emsworth*



65. This site was assessed in the Gaps review which found that it was not suitable for development because it has a high landscape value, is situated in the Chichester Harbour Area of Outstanding Natural Beauty (AONB) and contributes to the separation of Emsworth and Havant by its open character and location. These findings, together with its poor performance in sustainability appraisal, justify non allocation of the site.

*Emsworth – Site BD38: Interbridges West*

66. This site was allocated for employment development in the Havant Borough District Wide Local Plan and remains allocated under saved Policy EMP1.8. However more recent assessment of the site, in the ELR update, concludes that it is highly constrained by road access which is a “showstopper” to employment development. A Statement of Common Ground (SCG), signed by the Council and the landowners, identifies a number of areas of agreement. These include the site’s planning history, the approach of the Highways Agency to the use of the site for certain roadside uses and to uses which would generate additional trips, and the likelihood that the Council would consider favourably an application for a hotel, restaurant and filling station on the site within the Emsworth urban area boundary.
67. However as concluded in section 3 above there is no need for additional employment land to be allocated. Furthermore whilst discussions have commenced, there is no certainty that vehicular access to serve employment use of the site can be secured. On this basis, whilst some employment development may be appropriate, there is no justification for the allocation of this site in the Plan.

*Emsworth – Site UE39: Land North of Long Copse Lane*

68. This site was identified in the 2012 SHLAA and was considered suitable for housing subject to highway improvements to provide vehicular access. The landowner contends that the necessary improvements can be secured through a section 278 agreement and satisfactory access provided. In addition it is argued that all the potential adverse effects identified in the 2012 Sustainability Appraisal Addendum (SAA), which included appraisal results for this site, can be overcome.
69. I note that the SAA incorrectly identifies the site as being within Landscape Character Area (LCA) 23 rather than LCA21. However it is clear that regardless of this inaccuracy the SAA recognises the open character of the site, its contribution to the landscape and its location within an undeveloped gap. Furthermore whilst planning permission has been granted for housing development to the west and east of the site, the environmental, ecological and archaeological issues raised in the SAA support the Council’s conclusion that this site is less sustainable than the allocated sites in Emsworth.

*Havant – UE30: Land South of Lower Road, Bedhampton*

70. The evidence leading to non-allocation of this site is confused and fragmented. It was identified in the SHLAA as a potential housing site and is recommended for development in the Gaps review. SA identified loss of agricultural land as a strong adverse effect, as well as noting adverse effects on the landscape, biodiversity, the adjacent conservation area and features of archaeological importance. However the site continued to feature in SHLAAs from 2010 to 2013 albeit the 2013 SHLAA, whilst retaining an estimate of 250 dwellings, indicated that access through the conservation area could limit

large scale residential development. It was then discounted because the cumulative adverse effects would not be outweighed by a contribution of only 15 dwellings, with no explanation of the reduction to 15 dwellings.

71. The landowners have submitted a winter waterfowl survey undertaken between November 2013 and March 2014 which shows no use of the open fields by waterfowl. In addition they contest the Council's view that the site is grade 1 agricultural land. They argue that the site is capable of accommodating 50 dwellings.
72. Some of the adverse effects identified in SA can be overcome whilst others, such as the site's biodiversity and the grading of the land, remain matters of disagreement between the Council and the landowner. However it is clear that the site's proximity to Old Bedhampton Conservation Area through which it would be accessed is a strong factor weighing against development. This, together with uncertainty of impact on biodiversity and agricultural land, justify the non-allocation of this site.

*Hayling Island – UE47: Tournerbury Farm*

73. This site is identified in the SHLAA but has not been allocated as it has a number of uncertainties relating to flood risk, biodiversity and designated sites. The landowner contends that all of these matters can be overcome. However the uncertainty that remains regarding whether or not these sensitive issues can be satisfactorily addressed is sufficient to justify non-allocation.

*Hayling Island – UE17: Land at Rook Farm/Hayling Island - UE35: Land North of Rook Farm*

74. These sites are adjacent to each other and in the same ownership. The Council acknowledges that it had earlier supported the allocation of UE35, but justifies its omission from the Plan on the grounds it would lead to the delivery of too much housing on Hayling Island as well as their classification as being "uncertain" for Brent Geese and waders through Policy DM23.
75. The landowner has objected to the omission of these sites from the Plan on the grounds that additional housing is needed on Hayling Island and that the classification under Policy DM23 is not supported by robust evidence. However the housing restraint on Hayling Island is justified by evidence and consistent with distribution of housing set out in the CS. The classification of these sites under Policy DM23 is supported by evidence and whilst it does not preclude development, it is a matter that would need to be addressed through further study and potentially through mitigation in any future plans for development.

*Sites that have not been subject to sustainability appraisal or consultation*

76. Havant Magistrates Court, land at Avenue Road, Hayling Island and Northney Marina have all been promoted as suitable for housing or mixed use development. However the fact that they have been put forward at a late stage in the Plan preparation process means that they have not been taken through the appropriate legal processes that would enable them to be allocated. On this basis their allocation in this Plan would not be sound.



