

Comments on Matters and Issues related to the Examination of the Havant Borough Local Plan on behalf of Havant Climate Alliance and Havant Friends of the Earth

Matter 2 - Housing

Policy DR1.

2.2. Housing requirement figure

In view of constraints detailed at 1.3, the housing requirement figure of 10,433 dwellings by 2037, arrived at by standard methodology is not sustainable and a lower figure should be set.

Policy H2 The Covid pandemic has highlighted the large numbers of people dependent on precarious incomes who could not manage “affordable to buy” or even “affordable to rent” homes, but who need homes at social rent. A different tenure split within the “affordable homes” category is needed, which will increase the number of homes available for “social rent” e.g. 20% for shared ownership, 30% for affordable rent and 50% for social rent.

Policy KP5 – Southleigh.

2.14. Impact on strategic road network

As much as we seek to reduce private car use we recognise that the development of 2,100 homes at Southleigh will generate a considerable increase in traffic, specially that seeking to join or leave the A27. We are concerned that this will lead to a deterioration in air quality (Policy E25). The Mainland Transport Assessment - Southleigh Development Impact Study concludes that roads and junctions around the Southleigh site will exceed their operational capacity by 2037. This study takes account of proposed housing allocations in Chichester and West Sussex, as well as Southleigh, but does not appear to have looked at proposed allocations, over 1,700, in Rowlands Castle and Horndean (from the East Hampshire District Council Draft Local Plan to 2037). Some of the extra traffic from here might seek a short cut to the A27 via Horndean Road. Taking this additional traffic into account it might be reasonable to conclude that the cumulative effect of proposed developments to the north and east of Southleigh, as well as Southleigh itself, will have a severe impact on the strategic road network by 2037.

2.15. Traffic modelling assumptions.

The modelling assumptions used by the Mainland Transport Assessment Addendum would be more robust if it took into account proposed allocations in Rowlands Castle and Horndean, see above. Only Chichester and West Sussex are considered to contribute to a cumulative increase in traffic.

2.16. Justification for new junction with the A27.

The Mainland Transport Assessment Addendum for Southleigh, Part 1, provides sufficient justification for a new junction with the A27, but it would be more robust if likely increases in traffic from East Hampshire as well as Chichester were taken into account. Any junction which depends on Warblington roundabout, such as Option 1b, will add to already existing congestion at peak times, increasing air pollution

and carbon emissions in the area. To avoid the Warblington roundabout, a new interchange is needed onto the A27, just west of the service stations, with both east and west access and exit roads, unlike 4D.

2.20 Is the development of the Best and Most Versatile land justified?

The Council is in a difficult position in so far as virtually all of the greenfield agricultural land which falls within its boundaries comes under the Natural England classification of Best and Most Versatile agricultural land. (Policy E6. BMV Land). Natural England say that such land should remain in agriculture. The NPPF says that development on BMV land is unlikely to be supported. This is confirmed in Policy E6 of the Local Plan. However the Council say that they would be unable to meet their objectively assessed need for housing delivery on brownfield land and greenfield sites of lower agricultural quality alone. This is qualified by the statement that they will not support development on greenfield sites outside of settlement boundaries (Policy E3). Settlement boundaries are said to be determined by the extent of existing built up areas, but have been drawn up in a way which includes swathes of BMV land, which are then seen as acceptable allocations for development. Such areas of BMV land designated in the Local Plan are already built or being built over or are seeking planning permission to be built over e.g. Forty Acres, Sinah Lane, Long Copse Lane, Campdown, Southleigh, Land East of Castle Avenue, Camp Field, Rook Farm. In adjoining West Sussex large areas of BMV land are also due to be developed. There will be a large cumulative loss.

BMV land is a scarce and valuable agricultural resource in the UK. Post Brexit one would have expected that the need for food security would make the retention of this land a top priority. If this case, Havant's housing development numbers would appear unsustainable and a lower figure should be agreed. Is it the Government's opinion that BMV land should be sacrificed so that housing delivery numbers can be increased?

2.21. Does Policy KP5 conflict with Policy E6

Policy KP5 does conflict with Policy E6, reference our comment on MIQ 2.20. As KP5 is the only option for delivering the largest allocation of homes, 2,100 beyond 2037. Post Brexit one would have expected that the need for food security would make the retention of BMV land a top priority. If this is the case, Havant's housing delivery targets can be seen as unsustainable and a lower figure should be agreed.

2.23. Should Policy KP5 or its supporting text refer to it as being within the Chichester and Langstone Harbour SSSI impact risk zone?

Yes it should, given its geographical position. It is not recorded as a support site for Brent Geese and Waders which may be due to the way that the land has been managed. If nature reserves/wildlife corridors are established around or through the built site, as envisioned in the Southleigh Masterplan, this may increase its value to Brent Geese and Waders in future.

Patricia Brooks. 18.6.2021