Draft Local Plan consultation summary tables

May 2018
Corrections made 11 July 2018 and 8 November 2018
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Introduction sections
89 responses were received regarding the overall vision and strategy of the Draft HBLP 2036. These have been split between the summary tables for Chapters 1 and 2 where appropriate. Responses regarding specific policies and/or allocations have been moved to the relevant summary tables, a note and link to these are provided in the table below.

### Summary of key comments raised by residents and other stakeholders

#### WHAT IS A LOCAL PLAN? (Paragraphs 1.1 to 1.5)

Paragraph 1.1 - “Safeguarding” the environment should be replaced with “improving” as the former places the wrong emphasis when present levels of environmental pollution are not good.

#### WEIGHT OF THE DRAFT LOCAL PLAN (Paragraphs 1.18 to 1.19)

Question as to what the purpose of a “draft” plan is if it only has “limited” weight; this indicates developers will follow the previously used process of appealing against planning refusals.

Concern regarding the wording and weight to be applied; this should be deleted to avoid issues of soundness. A reference to the NPPF (or repetition of wording) would be sufficient to explain weighting.

Paragraph 1.18 is not in line with the NPPF as:
- It affords “limited” weight; this is beyond the wording in paragraph 216 of the NPPF
- It will be a “material consideration”; if a decision-taker concludes that a plan is at a very early stage, or there are significant unresolved objections, then he/she can conclude that no weight should be applied at all.

Paragraph 1.18 - “the development plan remains that set out in paragraph 1.8”, however this paragraph refers to the Pre-Submission Plan.

#### EVIDENCE BASE (Paragraphs 1.20 to 1.22)

The Council’s response to concerns regarding infrastructure through the production of an Infrastructure Delivery Plan (IDP) is welcomed and supported.

Many residents’ concerns regarding specific developments relate to road access.

It is requested that the Council conduct a further consultation on the Infrastructure Delivery Plan (IDP), when the Transport Assessment is available, to ensure that it adequately addresses the road network issues.

Paragraph 1.22 - Without such important evidence bases, there is no point commenting on the Hayling Island aspects of an incomplete and doubtful plan.

Paragraph 1.20 to 1.22 - There is no reference to any historic environment evidence here or on the Council’s supporting evidence webpage. It is expected that the Council should have an adequate, up-to-date and relevant historic environment evidence base and show how this has informed and influenced the plan.

Question as to whether the Council has historic environment evidence (e.g. list of locally important heritage assets, surveys of Grade II listed buildings at risk etc).

Representations regarding the Infrastructure Delivery Plan (IDP) and the Hayling Island Highway and Transport Infrastructure Assessment can be found in the summary table entitled “Evidence Base - Infrastructure Delivery Plan”.

#### THE NATIONAL AND REGIONAL CONTEXT (Paragraphs 1.25 to 1.31)

Paragraph 1.27 - It is inaccurate and invidious of the HBLP 2036 to just emphasis housing supply as a key focus of the NPPF; environmental issues are no less significant. Paragraphs 7 and 8 of the NPPF should also be referenced.

The PUSH Spatial Position Statement (June 2016) talks positively about the need to create and maintain strategic countryside gaps - Local Plans need to identify such gaps.

Representations regarding Figure 18 (Settlement boundaries) can be found in the summary table entitled “E10 - Landscape and Townscape”
Representations regarding Campdown can be found in the summary table entitled “H41 - Land east of College Road, Campdown”

**THE JOURNEY OF HAVANT BOROUGH (Paragraphs 1.32 to 1.50)**

Paragraphs 1.32 to 1.40 are welcomed.

Paragraphs 1.32 to 1.46 - It should be added that the historic street layout, cultural functions and tourism have contributed towards the area’s sense of place.

Paragraph 1.35 - There is no evidence of parchment-making in Havant as far back as 1215. Submitted comments include evidence of parchment making from 17th century onwards.

There should be references to Emsworth, Bedhampton, Hayling Island, Langstone, Cowplain, along with agriculture and forestry inland, and not just Havant Town.

The plan omits any mention of the ancient Bedhampton settlement; this is a ‘blind spot’ and emphasises that this important heritage asset has been overlooked/failed to be recognised.

Do not quote ridiculously old statistics which cannot be true for Hayling residents. With the closure of so many businesses in Havant Xyratex/Seagate, Colt, Langstone Technology Park is ghostly. We have lost a huge number of professional jobs to be replaced by retail parks, hotels which mostly pay minimum wage! In 2011, 40% of Havant borough residents worked within 5km of their home.

The plan will not comply with paragraphs 29-31 of the NPPF as:
- Work with neighbouring authorities regarding cycling provision has not been addressed
- There is no recovery plan to resolve the minimised maintenance of off-road cycle routes (e.g. Bridleways 123, 28 and the Hayling Billy Trail)

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with the introduction chapter as proposed in the regulation 18 draft with wording amendments, including those necessary simply to update the text to be relevant to the Regulation 19 draft. A breakdown of amendments to be considered, and comments where no changes are considered necessary, is provided below on a section-by-section basis.

a) **What is a Local Plan (Paragraphs 1.1 to 1.5):**

[Government guidance on Local Plans](#) outlines the role of a local plan and how it is a basis for safeguarding the environment. Consider how the wording could be amended to reference the guidance or whether the suggested wording may be more appropriate.

b) **Weight of the Draft Local Plan 2036 (Paragraphs 1.18 to 1.19)**

The comments made refer to the specific weight of a Regulation 18 draft. This will be updated as a matter of course as part of the preparation of the Regulation 19 draft.

c) **Evidence base (Paragraphs 1.20 to 1.22)**

[Infrastructure Delivery Plan (IDP) and Transport Assessment (TA):](#) evidence base studies are generally not subject to consultation in and of themselves. Nonetheless, there will be an opportunity to consider, through the Pre-submission consultation, whether the findings of those studies have been incorporated into the Local Plan in a sound way.

[Historic Environment:](#) The proposed key sites and allocations in the Draft HBLP 2036 have been screened for heritage and archaeological potential - these can be found in Section 2 of the Summary of Site Screening Work (December 2017) evidence base document. In addition, the Council's [Annual Monitoring Report (AMR)](#) provides a section on built heritage (pages 33 to 34) including references to the breakdown of heritage assets in the Borough and how the number of historic buildings at risk is decreasing. Consider how
references to these documents could be made in proposed policy E9 (Historic Environment and Heritage Assets) rather than this section of the HBLP 2036.

d) The National and Regional Context (Paragraphs 1.25 to 1.31)

The PUSH Spatial Position Statement supports strategic countryside gaps, but it is not considered that any gaps of ‘sub-regional significance’, nor of ‘fundamental local importance’ exist in the Borough, which would outweigh the need for housing. It is acknowledged that undeveloped gaps were protected by policies in the adopted Local Plan. However, in the new HBLP2036 it is no longer possible to continue this protection, as there are not enough brownfield sites and sites within the existing urban area to meet the Borough’s housing need. Therefore, greenfield sites outside of the existing urban area have had to be considered for development. With this, proposed Policy E10, aims to prevent the coalescence of distinct settlements where possible.

Consider how paragraph 1.27 may be amended to reference the three dimensions to sustainable development (economic, social and environmental) as outlined in paragraphs 7 and 8 of the NPPF.

e) The Journey of Havant Borough (Paragraphs 1.32 to 1.50)

The Havant Borough Profile (January 2018) provides a breakdown of the birth and growth of the Borough’s five areas; Emsworth, Havant & Bedhampton, Hayling Island, Leigh Park and Waterlooville. This evidence base includes the characteristics submitted by residents. Consider how the section may be amended to:

- Include a summary of how the five areas were born and have grown rather than solely focusing on Havant Town
- Incorporate the submitted comments regarding evidence of parchment making and the uncertainty over whether Havant parchment was used for the Magna Carta (1215)
- Explicitly state how the Borough’s history has contributed to its sense of place
Chapter 2 - Vision and Delivery Strategy

89 responses were received regarding the overall vision and strategy of the Draft HBLP 2036. These have been split between the summary tables for Chapters 1 and 2 where appropriate. Responses regarding specific policies and/or allocations have been moved to the relevant summary tables, a note and link to these are provided in the table below.

Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>GENERAL</th>
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<tbody>
<tr>
<td>The previous local plan was adopted in 2016 and supposed to be valid until 2026; changing the Local Plan to accommodate this development goes against the principle of having a local plan.</td>
</tr>
<tr>
<td>The Council does not care about the people of Havant and their views/opinions.</td>
</tr>
<tr>
<td>Ironically, the Council has committed sites that may have been successfully refused as applications.</td>
</tr>
<tr>
<td>The overall impression is that the plan is rushed and lacks certain detail (i.e. transport and infrastructure).</td>
</tr>
<tr>
<td>It is unbelievable that at a time of constraint/austerity, the Council has either the internal staff or money to pay external consultants to produce a verbose, repetitive document of “wishy-washy” generalisations.</td>
</tr>
<tr>
<td>If my staff had presented a plan of this kind they would have “been sent packing”.</td>
</tr>
<tr>
<td>The planning process took a self-inflicted credibility blow by permitting an unplanned supermarket on a greenfield site.</td>
</tr>
<tr>
<td>Concern that despite petitions from hundreds of residents and the Council’s Planning Committee unanimously refusing development, such developments are allowed on appeal by the Planning Inspectorate.</td>
</tr>
<tr>
<td>The need for a Local Plan is recognised, it will enable the Council to control development/return control to councillors who are accountable to residents, and prevent inappropriate proposals.</td>
</tr>
</tbody>
</table>

Support to the Council’s endeavour to have an up-to-date Local Plan in place in view of:

- Potential changes to the National Planning Policy Framework (NPPF)
- Potential changes to standard methodology for calculating housing numbers
- The Council’s vulnerability to unplanned development based on no 5-year housing land supply

The policies address many resident concerns; it should provide a good basis for managing development.

Concern that policies will not be enforced, or they will be cast aside when inconvenient - i.e. strategic gaps.

Concern that a plan which addresses all key element required by the NPPF will place too great an emphasis on housing and economic development.

There is a lot of cold, technical detail (e.g. maps, figures and data). People will not see the plan as bold and exciting because they will not be able to look beyond the headlines (i.e. housing numbers).

Further thought should be given to what the journey to 2036 will look and feel like, i.e. bring life to the plan by presenting a range of examples of various stages in their lives.

The plan needs overarching “2036 Goals” which all development must contribute to, for example:

- Reduce Havant Borough’s impact on the environment
- Make Havant one of the best places to live and visit
- Reduce commute times by 2036

The vision and strategic priorities do not reflect the three dimensions of sustainable development (economic, social and environmental) as set out in Paragraph 8 of the NPPF.

Representations regarding the Emsworth Gap/Area between Denvilles and Emsworth can be found in the summary table entitled “KS5 - Southleigh”
The successful appeal by McCarthy & Stone (2016) galvanised the Council into hastily producing new housing numbers ahead of the HBLP 2036.

Despite over 800, mostly critical comments, the LPHS was approved by the Council.

The LPHS did not meet the regulatory requirements of a Local Plan regarding consultation and examination.

The Draft HBLP 2036 draws heavily from the LPHS; this casts doubt on the extent to which the Council has assessed and understands the deliverability of the allocations now proposed.

The Draft HBLP 2036 does not appear to be supported by any broad assessment of possible alternatives.

There was no “Issues and Options Consultation”. This would have given the local community a better opportunity to evaluate alternative possibilities and make an informed choice. It is important that alternative strategies proposed in response to this regulation 18 consultation are given very careful consideration.

**WHAT WILL HAVANT BE LIKE IN 2036? (Paragraphs 2.7 to 2.27)**

The BBC published a nation-wide study in 2017 which showed 46% of land in Havant Borough is built on compared to Chichester (4%), East Hampshire (5%), Winchester (4%) and Fareham (38%).

There is no mention of safeguarding heritage in the six overlapping strategic priorities; this disregards the Council’s duty. The plan would have more claim on being a “positive strategy” if the role and significance of heritage had reference in some of the other key aspects of the plan.

Paragraph 2.7 - Disappointing that there is no reference to the environment - historic or natural.

**a) New housing meeting the varied needs of residents for affordability and type:**

The Partnership of Urban South Hampshire (PUSH) has pressured the Council to take on a larger proportion of government housing when the land space in Havant is more restricted than other Boroughs.

The PUSH mindset aims to increase Hampshire’s economy; they see building more homes as a pre-requisite to a growing workforce. Artificial intelligence (AI) and robotics will lead to fewer jobs.

The plan needs to consider the policy interventions set out in the White Paper (February 2017).

The Government has demanded the intensification of housing toward the South East while other regions need support for both housing and industrial/commercial development (e.g. the “Northern Powerhouse”).

The London-centric Government have no regard to quality of life, local circumstances, history or nature.

The Council claims housing numbers are set by central government; however, government sources confirm they are the responsibility of the local councils.

The critical analysis of local housing need related to existing major areas of employment is missing.

Residents feel the Council lacks the conviction to stand up and protect their wellbeing and the environment.

Questions as to why the Council has not protested/tried to negotiate with central government.

Question raised as to where the Council’s Brownfield Register is located.

The Council has, perhaps, been encouraged by the New Homes Bonus.

No account has been taken of Brexit.

Increasing housing supply without first controlling land prices will not solve the housing crisis.

The scale and density of building is alarming and will lead to continuous urban sprawl along the south coast.

Whilst we may have an ageing population, to counter this local young families are only supposed to be having 1.2 children - it must balance out somewhere without the need to urbanise every non-protected piece of land in the Borough.

There is no indication of how adjacent Boroughs and dealing with their respective housing plans.
There is a massive shortage of housing; the Council should get on and facilitate home building.

The Council should look at the waste of unused and outdated industrial sites within the Borough.

The design and building of new houses should be sympathetic to the area so that generations take pride.

The plan needs to ensure developers provide a mix of dwellings, including affordable homes, starter homes, affordable elderly accommodation/retirement flats, extra care housing for older people and bungalows (2 to 3 bedrooms) with small gardens.

The Borough will become a retirement village/dormitory/commuter area for Portsmouth, London and Surrey.

Housing should be planned in the north of the Borough where there is suitable infrastructure (i.e. A3(M)).

The plan needs to include provision for custom and self-building, co-housing and co-operative housing; land on larger sites should be reserved for this purpose.

There is an unrealistic reliance on housing delivery from larger strategic sites to meet the identified need. Given the complex land assembly and infrastructure requirements involved in bringing forward these larger sites, they cannot be relied upon to address all of the short-term delivery issues.

Paragraph 2.10 - This is a positive statement and is supported

Representations regarding housing trajectory and types of sites to come forward first can be found in the summary table entitled “H1 - Housing need, supply and brownfield sites”

Representations regarding Affordable/ Social Housing and the Hampshire Homes Register can be found in the summary table entitled “H2 - Affordable Housing”

Representations regarding housing density (both in and outside the countryside) can be found in summary table entitled “H3 - Housing Density and Mix”

Representations regarding the need for Council-run care and nursing homes can be found in the summary table entitled “Evidence Base - Specialist Housing Analysis”

b) New employment, education and training opportunities to boost the economic growth and address the skills gap:

Pleased that the plan considers retail and employment opportunities.

The need to develop business and employment opportunities is understood; however, this should not be at the cost of existing communities.

Concern that there is not enough space allocated for employment sites to produce sufficient jobs for the proposed level of housing.

Concern that the Borough has the lowest application rate to universities in the country; this should be noted in the plan and must be addressed if the area is to have a skilled workforce.

Representations about Havant Town are covered in the summary table entitled “KS1 Havant Town Centre”

Representations about Dunsbury are covered in the summary table entitled “KS6 - Dunsbury Park”

c) New infrastructure improvements to support communities and businesses:

Pleased that the plan considers education and healthcare.

Trains: There should be a plan/policy to encourage the use of the four railway stations.

A pedestrian/cycle network should be identified in the plan.

The plan needs to recognise that people drive; it should not be presumed that people will use public transport, walk and/or cycle.

Transport assessment: The plan cannot be signed off without the Transport Section/Plan; this should define specific measures that will be done to improve driving conditions, reduce commute times (set an objective to achieve by 2036), the volume of traffic/gridlock and sufficient public transport.

The proposed level of housing will increase numbers commuting out the Borough for work.
The Council needs to provide good and ample parking.

There is no mention of traffic at the Rusty Cutter roundabout or school places.

Will a school bus be provided for the schools recommended in the plan?

Paragraph 2.17 - Add reference to Bus Rapid Transport (BRT) regarding bus-based public transport.

Representations about the A27 junction are covered in the summary table entitled “KS5 - Southleigh”

Representations about congestion/gridlock of specific roads/routes are covered in the summary table entitled “IN2 - Improving Transport Infrastructure”

Representations about air pollution are covered in the summary table entitled “E20 - Amenity and Pollution”

Representations about the A3023, Hayling Bridge and Hayling Infrastructure are covered in the summary table entitled “Hayling Island General”

d) New focus on the regeneration of the Borough’s town centres and Hayling Island Seafront:

The Council needs to rethink their strategy by focusing higher levels of growth in urban and town centre areas, working with local landowners/stakeholders and agreeing regeneration briefs with access to education, employment, healthcare, transport and retail for truly sustainable development.

The Council’s support for the regeneration of Hayling Island Seafront and the identification of the island as a leisure destination is endorsed.

The priorities need to support the wider role of tourism as it makes a significant contribution to the economy.

The plan needs a chapter defining “Attractions and Leisure Developments” to define the types of features the Borough requires and thus promote an active and healthy populous to reduce the cost on the state.

Paragraph 2.19 - No more housing should be built until infrastructure and transport is deemed adequate.

e) Celebrating Havant’s natural environment, sunny climate and South Downs-Solent location whilst addressing climate change:

This section should also reference to the historic environment.

Equal amount of attention and protection should be given the environment and green spaces.

Numerous places in the Borough do not have protection; this should be looked at again.

Development will result in damage/harm to nature and people through pollution, water and waste treatment demands, traffic congestion and lost of most versatile agricultural land.

New development must include green spaces/green infrastructure and achieve separation from traffic, along with newly planted trees and hedgerows so that residents benefit from clean air, wildlife and wellbeing.

The Victorian ethos of providing parkland and green corridors should be emulated.

There should be no development south of the A27 so to preserve the rich coastal wildlife habitat.

The Council appears to be building as many as it can irrespective of the impact on the character and sustainability of its landscapes.

The Council should focus on sustainable brownfield sites and needed urban regeneration; this will preserve the wildlife, habitats and much-loved countryside.

There is resentment and distrust in the planning system as strategic gaps have been removed.

Development in the countryside/rural fringes whitewashes the local plan policies; it demonstrates bad planning and a weak/cynical planning authority pushing housing in areas of perceived lower objection levels.

Although housing pressures are acknowledged, the countryside envelope should still be preserved as to:

- Maintain the separate identities of communities
- Protect habitats for endangered species
- Protect urban areas from flooding
- Protect the provision of open space for recreation and enjoyment of the countryside
- Protect and manage water quality
- Prevent the irreversible and adverse impact on the character of semi-rural areas
- Prevent out-commuting and high levels of car ownership

**Representations about Land north of Long Copse Lane (H6) and Land at Westwood Close (H10) can be found in their respective summary tables**

The plan hints to a new biodiversity document with the term “Action Plan” replaced with “Strategy”; a plan is usually a series of specific steps whereas a strategy merely signposts the direction of travel.

There is no real acknowledgement that developers must demonstrate net benefits to biodiversity.

A condition of planning should be that an ecological clerk of works is appointed on all major sites.

The plan says little about achieving a balance between housing provision and conserving natural assets.

As a sea-facing community, the Borough is likely to be in the front line of climate change/sea level rise.

Planting more trees and hedges can manage climate change and remove carbon from the atmosphere.

Trees replanted by developers are often dwarf varieties which are less robust for carbon storage.

Importance of adaptation/mitigation to climate change mentioned; however, few specific examples proposed.

There are no allocations for building renewable energy capacity, i.e. charging points.

The Council should have an objective/mandate to reducing the impact on the environment which includes:
- Solar photovoltaic panels
- Solar street lights
- The use of ground source heat pumps
- All developments to be carbon neutral

Waste recycling will become more of an issue with an increasing population.

**Paragraph 2.22:**
- This should be revised to identify the role tourism accommodation has in the Borough for driving economic growth and how this can be further promoted
- Reword first sentence to include ‘‘and tourism opportunities’’
- Add to the end of the paragraph, ‘‘as well as taking wider opportunities to support tourism in the Borough, in recognition of its contribution to economic growth. This will include promoting tourism accommodation’’.

**Representations about Home Quality Mark (HQM) can be found in the summary table entitled “E8 - Low Carbon Design”**

**Representations about the Sustainability Appraisal (SA) can be found in the summary table entitled “Evidence Base - Sustainability Appraisal”**

**DEVELOPMENT STRATEGY (Paragraphs 2.28 to 2.40)**

There is no mentioned of safeguarding heritage; this disregards the Council’s duty.

Caution is urged not to be over reliant on previously developed sites, otherwise this will bring significant risk and may undermine the plan’s capacity to bring forward new housing in the short-term.

Pleased to see the commitment to driving and delivering sustainable development and the recognition of the finite amount of undeveloped land available.

**Paragraph 2.29:**
- The Council should stand up to central government and reduce the number of homes
- Development should comprise one and two-bedroom properties only
• Development should be built cheaply so that young people can afford them and when sold on should only be reserved for other young people looking to buy
• Development on prime agricultural land should not be included
• The purchasing of second homes and/or several houses to rent should be prevented
• Existing second home owners should pay increased Council Tax to help pay for social care

Paragraph 2.31 - Support for focusing development close to existing services/facilities (i.e. town centres)

Paragraph 2.35:
• Pleased to see acknowledgement of high quality environment and that the plan seeks to protect biodiversity value and the benefits this has for residents
• The benefit of the natural environment to the local population must not compromise those species and habitats which form this very environment
• Areas of high quality biodiversity value, within and outside designated nature conservation areas, must be protected
• Access to nature conservation areas must be managed so that damage is not caused by increased recreational pressure
• Should also be acknowledgement of the role of the historic environment

Paragraph 2.38 - Expand reference to safeguarding sites to include wider south Hampshire Bus Rapid Transport (BRT) routes, i.e. cross-Borough, route to Portsmouth and any necessary land on Hayling Island.

Paragraph 2.39 - It is hoped that the Council has considered the locations of the existing ecological networks when deciding which greenfield sites are to be developed.

Representations about timing of infrastructure can be found in the summary table entitled “IN1 - Effective Provision of Infrastructure”

Representations about the area between Denvilles and Emsworth are covered in the summary table entitled “KS5 - Southleigh”

Representations about Castle Avenue are covered in the summary table entitled “H16 Land east of Castle Avenue”

Representations about the Appendix 4 (Infrastructure Solutions) are covered in the summary table entitled “Evidence Base - Infrastructure Delivery Plan (IDP)”

POLICY DR1 (Delivery of Development & Regeneration)

The strap lines ‘leaving no stone unturned’ and ‘open for business’ have encouraged landowners and developers to declare a permanent open season for development.

The historic environment could be made more explicit in the plan, this would be in line with the NPPF.

Support for the Council’s ‘open for business’, proactive and collaborative approach.

Support in general terms, especially criteria h), i) and j).

Criteria i) and j) acknowledge the “pitfalls” of the proposed development strategy; it is questionable whether the Council has the capacity and resources to lead the simultaneous implementation of multiple large-scale urban redevelopment projects.

Add that all developments should provide safe and suitable access for all modes of transport and should not cause significant impacts on the local or strategic road network that cannot be managed or mitigated.

It is requested that the policy also mentions identified and suitable brownfield land across the Borough (i.e. Former BAE Systems Park).

The regeneration sites should be listed under a separate bullet point to KS5 Southleigh as they are a different approach to development.
The market demand for growth in Havant should be considered in assessing a planning application.

a) A renewed focus on brownfield regeneration:

Support proactive approach and possible use of Compulsory Purchase Orders (CPOs).

The HBLP 2036 will fail to boost the supply for housing as the plan relies on constrained and/or complex previously developed sites.

The focus on regeneration and redevelopment is appropriate; however, to meet housing need in the short-term and maintain a 5-year housing land supply, additional greenfield sites should be brought forward.

The Council should concentrate on urban regeneration as this will preserve green areas.

b) Pre-application engagement and expectations of the development industry

Paragraph 2.53 - It is stretching the truth to claim that Development Consultation Forums (DCFs) provide residents with a chance to influence proposals; DCFs are meetings held in public and not public meetings.

There should be a more inclusive approach beyond the DCF; i.e. a forum that allows direct engagement between communities and the developer to produce schemes that work for both.

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with the chapter and Policy DR1 as proposed in the regulation 18 draft with wording amendments. This includes factual updates and those which would be necessary simply to update the text for the Pre-Submission Local Plan.

A breakdown of amendments to be considered, and comments where no changes are considered necessary, is provided below on a section-by-section basis.

**General**

The Council will consider whether the text should be amended to include a clearer reference to the three dimensions of sustainable development as set out in Paragraph 8 of the NPPF.

**What will Havant be like in 2036? (Paragraphs 2.7 to 2.27)**

The Council will consider whether the text should be amended to clarify and further highlight a positive strategy to the historic environment and the Borough’s heritage.

a) New housing meeting the varied needs of residents for affordability and type - consider whether the text/plan should be amended to include greater clarity regarding the Council’s approach to custom and self-build, co-housing and co-operative housing

b) New employment, education and training opportunities to boost economic growth and address the skills gap - consider whether the text should be amended to include a reference to the Borough’s low education and university application rates, and how the plan will help address this

c) New infrastructure improvement to support communities and businesses (Paragraph 2.15 to 2.17) - consider whether the text should be amended to include a reference to Bus Rapid Transport (BRT) to paragraph 2.17

d) New focus on the regeneration of the Borough’s town centres and Hayling Island Seafront - consider whether the text should be amended to include a reference to the wider role of tourism and the contribution it makes to the economy. In addition, further investigate whether there is a need for additional research in respect of tourism and the visitor economy to inform the Regulation 19 HBLP 2036.
e) Celebrating Havant’s natural environment, sunny climate and South Downs-Solent location whilst addressing climate change - consider whether the text should be amended to include a reference to the historic environment and the suggested wording additions to Paragraph 2.22.

Development Strategy (Paragraphs 2.28 to 2.40):

The Council will consider whether the text should be amended to include wider south Hampshire Bus Rapid Transport (BRT) routes (i.e. cross-borough route to Portsmouth and any necessary land on Hayling Island) in the reference about safeguarding sites in Paragraph 2.38 and further emphasis on the historic environment.

Policy DR1 (Delivery of Development and Regeneration)

The Council will consider whether the text should be amended to include a more explicit reference to the historic environment.

b) Pre-application engagement and expectations of the development industry (Paragraphs 2.48 to 2.53)

The Council will consider whether the text should be amended to include further clarity on what the DCF process entails and residents’ expectations.

Comments where no change is considered necessary

The Adopted Local Plan (the Local Plan (Core Strategy) (March 2011) and the Local Plan (Allocations Plan) (July 2014): this is out of date. This was established as fact through a planning appeal in August 2016. If the Council does not adopt a new local plan, development will be allowed at appeal and so occur in a piecemeal fashion without the necessary infrastructure to support the development.

The Local Plan Housing Statement (LPHS): this is not a Development Plan Document (DPD). It is a position statement as to which sites the Council considers could deliver sustainable development to address the Borough’s housing need. The statement only identifies potential sites, it does not allocate them for development. Both the LPHS and the Draft HBLP 2036 have been supported by Sustainability Appraisals (SA). The SAs assessed the suitability of sites and potential alternatives.

Brownfield register: The Brownfield Register can be found on the Council’s Strategic Housing Land Availability Assessment (SHLAA) and Brownfield Register webpage.

Issues and options: whilst an issues and options consultation was not carried out, this is not necessary under the regulations and it is considered that the completion of a full draft plan has allowed key stakeholders, residents, developers, consultants and agents to influence the specific details of the emerging plan. The Sustainability Appraisal shows very limited options to accommodate the need for development in Havant Borough, giving an issues and options consultation only limited value.

Housing need and the impact of Brexit: the need for housing is made up of natural changes to the population and migration, both domestic and international. However, 95% of the Borough’s residents are British. The population is naturally rising and together with an increasingly elderly population, this creates additional housing need. The Government’s new standard methodology to calculate housing need is based on past trends; with this, the Government have confirmed that the projections set out in the September 2017 “planning for the homes in the right places” consultation took into account a substantial fall in net immigration following Brexit in March 2019. The Government has made it clear that significantly boosting the supply of new housing is a national priority. This will not change as a result of Brexit.

Evidence base on transport: the Borough-wide Transport Assessment (TA) and the Hayling Island Highway and Transport Infrastructure Assessment are underway. The findings of these assessments will be used to update the emerging plan, along with Policy IN2 and the Infrastructure Delivery Plan (IDP).
findings of the TA will be informed by the modelling work taking place on junctions and roads around the Borough including the Rusty Cutter roundabout. The Pre-Submission Local Plan 2036 will not go out to public consultation until these infrastructure studies are completed. Although it is recognised that residents drive, it is important to emphasise and encourage the use of sustainable transport methods such as the railway, bus, cycling and walking. As set out in this chapter, the plans strategy focuses on high density housing in town centres which will maximise the use of services which exist and the higher public transport accessibility such as the railway.

The Council has been in discussions with Hampshire County Council (HCC) as Lead Education Authority regarding school places. This is explained in more detail in the Infrastructure Delivery Plan (IDP). There has been no need for a school bus highlighted through this work.

**Meeting development need through higher densities:** the Council is proposing a strategy for higher residential densities in the town centres. More specifically, Havant and Waterlooville Town Centres (KS1 and KS2) and Leigh Park District Centre (KS3) have been highlighted for regeneration opportunities, of which, residential redevelopment is proposed.

**Stopping development whilst the evidence is completed:** the Council cannot stop all development so that the Transport Assessment (TA) and the Hayling Island Highways and Transport Assessment can be completed. Developers are free to submit development proposals at any time. This is why the Council considers it necessary to push forward with the Local Plan as swiftly as possible.

**Net biodiversity gain:** the Havant Biodiversity Strategy is underway and will incorporate the findings of the Solent Waders and Brent Goose Strategy (2018), the ecological mapping work undertaken by the Local Nature Partnership (LNP) and an audit of all the local ecological conservation designations in the Borough. From these, it is anticipated that the strategy will be able to outline any potential ecological/wildlife corridors as well as suggestions of how to achieve net biodiversity gain at the Borough-wide and micro-level.

**Strategic and countryside gaps:** the PUSH Spatial Position Statement supports strategic countryside gaps, but it is not considered that any gaps of ‘sub-regional significance’, nor of ‘fundamental local importance’ exist in the Borough, which would outweigh the need for housing. It is acknowledged that undeveloped gaps are included in the Adopted Local Plan. However, in the new HBLP2036 it is no longer possible to continue this protection, as there are not enough brownfield sites and sites within the existing urban area to meet the Borough’s development needs. Therefore, greenfield sites outside of the existing urban area have had to be considered for development. With this, proposed Policy E10, aims to prevent the coalescence of settlements and maintain settlement identity.

**Inclusion of the key sites in five year supply calculations:** the housing numbers proposed in KS1, KS2 and KS3 are not included in the Council’s 5-year supply. As areas of search, it is considered that Havant and Waterlooville Town Centres and Leigh Park District Centre are developable over the plan period. In their individual policies, the Council has stated that it will develop master plans for these key sites to take forward the principles in the Local Plan into more detailed frameworks.

**Commercial scale low and zero carbon energy and carbon neutral homes:** the Housing Constraints and Supply Analysis shows the limited opportunities for development. As such, the focus for low and zero carbon energy will be within the settlement boundaries. This includes the use of roofspace for solar photovoltaic energy, which is supported through Policy E8. The Council is also undertaking a feasibility study into the use of Combined Heat and Power to serve the Civic Campus. New homes built today are significantly more energy efficient than those built before 2001 due to changes in Building Regulations. In the past, it has been possible for Local Planning Authorities to require significantly enhanced energy efficiency and zero carbon homes (generally through the Code for Sustainable Homes. This is no longer the case. Nonetheless, the Local Plan is proposing to require a standard of energy efficiency 19% above Building Regulations, the maximum allowed by Government.
Key sites
KS1 - Havant Town Centre
23 responses were received regarding this topic

Summary of key comments raised by residents and other stakeholders

The review rightly identifies the problems found not only in Havant, but in other town centres nationally.

Support for the regeneration of Havant Town Centre providing that historic assets are protected and enhanced. The regeneration of the town centre should be made a priority in any sequential approach to development.

Support for criteria a), b) and j) as these are part of a positive strategy for the conservation, enhancement and enjoyment of the historic environment as required by Paragraphs 126 and 157 of the NPPF.

Support to the Council’s commitment to maintaining and enhancing the Borough’s heritage assets.

Criterion b) - It is suggested that the following wording is added: 

``enhance and conserve the historic environment``.

Piecemeal conversions have undermined the area’s conservation values; the Draft HBLP 2036 suggests little change.

Support for the use of Compulsory Purchase Orders (CPOs) on vacant plots (i.e. adjacent to the Post Office). Vacant plots should be the priority for redevelopment.

Questions raised how the Council will take enforcement action against landowners of derelict buildings.

Support for social hub and leisure units such as restaurants, cafes (not just fast food) and niche retail.

Paragraph 23 of the NPPF promotes tourism in town centres.

Support for greater housing provision in this central area to meet local needs, examples cited of how this approach has helped regenerate centres in Manchester and Salford.

The proposed 750 net new homes should be a minimum target.

The delivery of 750 net new homes is aspirational and requires detailed plans; uncertainty over the deliverability of KS1.

A forceful vision should be adopted.

Concerns over reduction in town centre parking, with suggestion for greater evening car parking for restaurants - this could be done by negotiating the use of the retail area car parks for longer periods in the evening.

The streets around the centre of Havant are used by commuters, people who work in the centre of Havant and in the retail areas, residents and visitors. There is not currently enough parking.

Suggestion to:
- Remove double and single-yellow lines to increase parking provision and act as de-factor traffic calming
- Introduce a comprehensive parking zone programme with parking permits and parking restrictions
- Include planning conditions that developments must have employee parking
- Encourage employers to pay for parking season tickets in the two-multi-storey car parks.

The current town centre layout does not provide an integrated shopping experience.

There are too many eyesores, unimaginative and distinct post war buildings which present a poor image.

**PEDESTRIAN & CYCLE LINKS:**

It is requested that development protects and, where possible, enhances Havant Footpath 51 (southern section of retail hub) and the Shipwrights Way (Market Parade).

Amend criterion c) to include “pedestrian and cycle connectivity”.

Suggestion to provide a raised walkway over the traffic for people walking between Havant Town, Tesco and M&S to reduce traffic queues.

Suggestion to develop from Havant Bus Station through to West Street (opposite McDonalds) to allow natural footfall from Havant Railway Station to Solent Road.

ROAD NETWORK:

Add road names to Figures 4a and 4b.

Concerns over increased traffic; the town centre becomes gridlocked every day at 11am and 4pm.

Criterion d):
- It is unclear whether the criterion is referring to the main B2149 Park Road North/South or the off-road pedestrian and cycle routes. The main corridor must reflect the fact it runs through the town centre where pedestrians and cyclist have priority.
- Need to reference potential Bus Rapid Transport (BRT) route to town centre and bus station.

Criterion i) - Amend to include "a transport assessment".

Paragraph 3.9 - Suggestion to add that development proposals should improve access by walking, cycling and bus. The Bus Rapid Transport (BRT) route needs to be highlighted as part of the solution to dealing with the proposed housing allocations.

Havant Bus Station no longer functions well and is ill-positioned as it blocks the traffic from the Meridian Centre Car Park. The possibility of relocation should be explored with Hampshire County Council (HCC).

It is requested that any potential adverse impact to the safe and efficient operation of the Strategic Road Network (SRN) is appropriately considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013.

RETAIL HUB:

The construction of the Central Retail Park was meant to include a subway from Wickes to Havant Park and street lighting next to the stream but neither have materialised.

The Retail Hub is soulless and could rapidly become abandoned warehouses.

The Solent Road development is successful and reads the changing retail market.

HISTORIC CORE:

Support for greater connectivity between the historic core and the retail hub.

The construction of the Meridian Centre in the 1990s did little to enhance the town as a shopping destination.

Suggestion to reconfigure the first floor of the Meridian Centre for leisure activities (i.e. cinema).

Havant, as a centre, lost its identity with the closure of its market.

The historic core provides an opportunity to provide a shopping area with character hosting independent shops and cafes.

Paragraphs 3.14 and 3.17 - The historic nature, attractiveness and sense of place should be presented as assets and an opportunity within a positive and proactive heritage strategy/vision as implied in paragraph 1.41.

It should be explained in the supporting text that development near the crossroad is likely to encounter archaeological remains. There should be a requirement for these to be preserved in situ.

Suggestion to create an Artisan Courtyard to showcase local skills (e.g. brewing, baking, craft-making, pop-up gallery etc). This would help engender local entrepreneurism and improve the visitor experience.

RAILWAY FOOTBRIDGE:

The bridge has continued to decline.
Hampshire County Council (HCC) removed the funding for a replacement bridge in 2008. The road and railway crossings should be made a primary objective. It is requested that a firmer indication is given in the plan for when the bridge will be replaced rather than just linking it to development in the future.

MARKET PARADE:
Market Parade provides a poor representation of Havant to visitors exiting Havant Railway Station. Support for the regeneration of Market Parade. The decision to grant permission for APP/14/01225 was a mistake. This has now expired and there is no longer an appetite for development. Objection to the proposed tall landmark building and high-rise development in general. This would be out of character of the town centre and will set a precedent for further exceptions. Suggestion that a height limit of 7-8 floors is placed on the proposed tall building as to prevent the historic centre being unbalanced. Suggestion that the area currently used as a temporary car park is instead developed into a public transport hub including a Railway Station forecourt area. The Parking SPD does not apply the two car parking spaces per two-bedroom dwelling near Havant Train Station - I urge you to consider how people who buy or rent any such apartments will park. Alternatives to car parking, i.e. car sharing schemes, should be considered.

EAST STREET:
The plan fails to specify how East Street will be developed. No objection to new homes in East Street. East Street is a mess and should be developed - the Council should force developers to act or buy the site themselves and develop it directly. The regeneration of East Street provides an opportunity for a pilot community-led housing approach (e.g. Liverpool and Leeds). Support for the removal of East Street from Havant Town Centre’s boundary. Objection to the removal of East Street from Havant Town Centre’s boundary as it is at the heart of the community and is a contradiction to Paragraph 3.7 East Street should be included in the “Historic Core” sub-heading of the policy; which should also be amended to ‘The traditional town centre focused on East Street, North Street, South Street and West Street - offering smaller retail units, cafes and restaurants”.
East Street should be included in the new master plan for the centre. It is unclear if the buildings in Pallant (rear of East Street) would still be in the town centre. The Council should have contacted the 20 business owners along East Street regarding the removal of the street from the Town Centre. All services and businesses along the street should be encouraged to remain. East Street already has an established service sector with a mix of retail, leisure and housing (photos submitted). Nos 21 and 24 East Street are now in state of disrepair since their conversion from office to residential. The historic buildings along East Street need to be protected. Representations about the Gazebo Garden can be found in the summary table entitled “H24 - Car Park behind the Bear Hotel and East Street”.

CIVIC CAMPUS:
Objections to building 300 of the 750 proposed homes by the Civic Centre due to erosion of green space and impact of increased traffic.
HBCs proposed way forward for Regulation 19 HBLP2036

There have been no fundamental matters raised which indicate that the policy and the level of residential redevelopment proposed in the town centre is not deliverable or should not be allocated in the HBLP 2036. Proceed with the policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to include:

- The suggested wording amendments/additions for Paragraphs 3.9, 3.14 and 3.17
- The suggested wording amendments/additions for criteria b (public realm), c (pedestrian connectivity), d (accessibility) and i (digital communication)
- Road names on Figures 4a and 4b
- A requirement that any adverse impact on the Strategic Road Network (SRN) is considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013
- Requirements that development protects and, where possible, enhances Havant Footpath 51 and the Shipwrights Way
- A requirement that any archaeological remains must be preserved in situ

From the comments received, it may be appropriate to either create a new policy which outlines the vision for East Street (excluding site H24) or include it within the town centre (KS1) for residential development to guide the transition of East Street from its current town centre role to a new edge of centre role.

The following detailed matters are for consideration at the planning application stage and are covered by policies in the Local Plan and supporting Supplementary Planning Documents (SPDs):

- Improving Transport Infrastructure (IN2)
- Housing Density (H3)
- Historic Environment and Heritage Assets (E9) regarding the protection of listed and historic buildings
- Parking (Havant Borough Parking SPD - July 2016)

Comments where no change is considered necessary:

- The Council has very limited powers to take enforcement action against landowners of derelict buildings
- The flexible approach of the policy would not prevent tourist facilities from coming forward in the future
- The housing numbers proposed are not included in the Council’s 5-year housing supply. As an area of search, it is considered that they will come forward for development later in the plan period

**Master Plan:**
- It is specified in Paragraph 3.10 of the Draft HBLP 2036 that “the Council will develop a new Master Plan for the Town Centre taking forward the principles in the Local Plan into a more detailed framework”. This will help prevent piecemeal development and, instead, provide a coordinated vision for the town centre. As such, the following will be considered at the master planning stage:
  - Provision of an integrated shopping experience with pedestrian/cycle routes
  - The visual representation and design of the town centre (including Market Parade)
  - The height of the tall landmark building in Market Parade
  - The linkages between public transport (please note it would not be viable, nor deliverable to relocate the Havant Bus Station)
  - The location and extent of car parking (depending on demand)

**Retail Hub:**
- There is already a subway from Wickes to the north-west corner of Havant Park (by Havant Cricket Club and Changing Rooms)

**Historic Core:**
- A market takes place along West Street every Tuesday and Saturday
Paragraph 3.17 highlights that on the first floor of the Meridian Centre “there is an opportunity to explore alternative non-shopping uses that provide community or leisure facilities”; the policy would, therefore, not prevent a cinema and other leisure uses coming forward.

- **Railway Footbridge:**
  - The enhancement and/or replacement of the railway footbridge will require a source(s) of funding; the future redevelopment of Market Parade will contribute towards this.

- **Market Parade:**
  - Although planning permission for APP/14/01225 has expired, the Council’s vision still includes a tall landmark building reflecting its accessible location.

- **East Street:**
  - The units along East Street are in private and not public ownership; therefore, the community-led housing approaches being carried out in Liverpool and Leeds would not be possible here.
  - If it is deemed appropriate to continue with the removal of East Street from the town centre boundary, it would not mean that current businesses would have to leave. The removal would simply release the street from planning restrictions associated with a town centre location and, as such, would allow vacant units to be converted to residential dwellings at ground floor level.
  - The section of the Pallant adjacent to the south of Waitrose would remain in the town centre boundary.

- **Civic Campus:**
  - It is envisaged that the 300 homes proposed will be built in the footprint of the Havant Police Station, Her Majesty’s Courts Service and Hampshire Probation Service, BT Telephone Exchange and the Jobcentre Plus (Department for Works and Pensions Office) once these public services have either been successfully relocated due to being surplus to requirements. As such, most of the redevelopment will take place on brownfield land with very limited green space lost.
**Summary of key comments raised by residents and other stakeholders**

- Support for the regeneration of Waterlooville Town Centre.
- Support for greater housing provision in this central area to meet local needs, examples cited of how this approach has helped regenerate centres in Manchester and Salford.
- The regeneration of the town centres should be made a priority in any sequential approach to development.
- There is evidence of socio-economic benefits for seeking a residential component of a wider regeneration strategy.
- There is uncertainty around the deliverability of KS2 due to viability concerns, land assembly negotiations and others. The policy should not be relied upon to provide new dwellings.
- It is suggested that a master plan exercise is undertaken to help realise the potential of this under-utilised area.
- Paragraph 23 of the NPPF promotes tourism in town centres.

**RESIDENTIAL DEVELOPMENT & DENSITY:**

- Concerns over insufficient parking, density and height of development; high-rise would be oppressive and ugly.
- The capacity of 600 new dwellings could be increased through design and density if appropriate.
- Waterlooville shopping precinct should be demolished and replaced with housing. Existing shops could be relocated to the more modern shopping area west of Waterlooville.

**RETAIL:**

- Support for Criterion j). Clarification that the "primary shopping area" refers to the primary frontages outlined in Figure 5b.
- Criterion k) - this is too restrictive given the rapid changing nature of retail.
- Criterion l) - it is inappropriate as a matter of principle to preclude residential uses within the primary shopping area.

**PEDESTRIAN & CYCLE LINKS:**

- Amend Criteria b) and gg) to include cycle connectivity.
- Amend Criterion c) to include a reference to the need for a cycle route through the town centre which avoids the mains roads around the town centre.
- The cycle provision to the town centre is poor and feels unsafe when crossing Maurepas Way.
- The pedestrian link between St George’s Walk (Area 1) and Wellington Retail Park (Area 3) is unsuitable due to steep steps; the long footway is also exposed to all weather conditions.
- Suggestion to restore the old slope adjacent to St George’s Hall to the original layout which is covered.
- The pedestrian section of London Road is run-down, poor quality and has no atmosphere or character.

  In line with the aspirations of the Hampshire Countryside Access Plan, it is requested that the following amendments are made to Criterion gg):
  - Development that improves the connectivity of Swiss Road, St George’s Walk, London Road and across Maurepas Way to Berewood and Havant Footpath 11 to encourage pedestrian flow.
  - Development which protects and enhances Havant Footpath 10.

**ROAD NETWORK:**
Add road names to Figures 5a and 5b.

It is requested that any potential adverse impact to the safe and efficient operation of the Strategic Road Network (SRN) is appropriately considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013.

Although there may be fewer privately owned cars by 2036; there will still be a large number in the intervening period.

An improvement in the layout of the encircling road network is required to integrate the town centre with its surroundings.

The transport issues facing Waterlooville and the previous investment in the Star Bus priority (previously A3 Zip) service are not mentioned.

There is a need to maintain good bus penetration into the town centre, enhance the bus facilities and improve cycle access (especially within the pedestrianised area of London Road). The removal of the St George’s Walk bus stops and relocation to a proposed “transport interchange” in an edge of centre location is not supported.

It is requested that the references to the “new transport interchange” and the removal of St George’s Walk bus stops are deleted.

Alterations to the bus stops and bus priority will need to be consulted with HCC and the bus operators.

<table>
<thead>
<tr>
<th>HBCs proposed way forward for Regulation 19 HBLP2036</th>
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</thead>
<tbody>
<tr>
<td>There have been no fundamental matters raised which indicate that the policy and the level of residential redevelopment proposed in the town centre is not deliverable or should not be allocated in the HBLP 2036. Proceed with the policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to:</td>
</tr>
<tr>
<td>• Include references to cycle connectivity in criteria b (connectivity), c (accessibility) and gg (improving pedestrian flow)</td>
</tr>
<tr>
<td>• Include Havant Footpaths 10 and 11 in criterion gg (pedestrian flow)</td>
</tr>
<tr>
<td>• Clarify that criterion j is referring to the “primary shopping frontage” as outlined in Figure 5b</td>
</tr>
<tr>
<td>• State that any adverse impact on the Strategic Road Network (SRN) is considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013</td>
</tr>
<tr>
<td>• Add the road names to Figures 5a and 5b</td>
</tr>
<tr>
<td>• Include a reference to the transport issues facing Waterlooville Town Centre at present, along with the previous investment in the Star Bus priority service</td>
</tr>
<tr>
<td>• State that any alterations to the bus stops and bus priority must be consulted with Hampshire County Council (HCC) and bus operators</td>
</tr>
<tr>
<td>• Incorporate a new direction for the transport interchange and the St George’s Walk bus stops</td>
</tr>
</tbody>
</table>

The following detailed matters are for consideration at the planning application stage and are covered by policies in the Local Plan and supporting Supplementary Planning Documents (SPDs):

- Landscape and Townscape (E10)
- Housing Density (H3)
- Parking (Havant Borough Parking SPD - July 2016)

Comments where no change is considered necessary:

- The housing numbers proposed are not included in the Council’s 5-year housing supply. As an area of search, it is considered that the site is developable over the plan period
- In relation to Wellington Retail Park, the National Planning Policy Framework (NPPF) (Paragraph 23) sets out what Local Planning Authorities (LPAs) should do to promote competitive town centre environments. In doing so, the policy outlines areas for residential-led regeneration in other parts of
the town centre and has made it clear which uses will be permitted within the primary and secondary frontages

- It is specified in Paragraph 3.31 of the Draft HBLP 2036 that “the Council will produce a more detailed master plan to facilitate the implementation of this policy”. As such, the following will be considered at the master planning stage:
  - The layout of the road network which encircles the town centre and how to improve their integration with the centre
  - The provision of bus and cycle access and safety in the town centre
  - The pedestrian/cycle link between St Georges Walk (Area 1) and Wellington Retail Park (Area 3).
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Support for regeneration of the area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Master planning would be appropriate. Such a proposal could only take place as a co-ordinated scheme for redevelopment, which would need to retain and support the viability of the retail area, as well as provide an enhanced public realm.</td>
</tr>
</tbody>
</table>

<table>
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<tr>
<th>Concern raised over lack of available feasibility analysis and associated uncertainty over delivery of dwelling numbers proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>There is greater scope to improve the public realm to the South of Park Parade to increase the attractiveness of the area to passers-by.</td>
</tr>
<tr>
<td>Retail units should be repositioned to front on to main roads so that passers-by are aware of their existence</td>
</tr>
<tr>
<td>Park Parade could be opened to traffic and provide on-street parking to allow passengers into the heart of the shopping centre.</td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

There have been no fundamental matters raised which indicate that the policy and the level of residential redevelopment proposed in the district centre is not deliverable or should not be allocated in the HBLP 2036. Proceed with the policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to include:

- A requirement for master planning/cohesive development which may also address;
  - Include provision of public realm improvements in specific areas
  - Provide on street parking and access for vehicles through Park Parade
  - Reposition shop frontages to front onto main roads

Comments where no change is considered necessary:
- The housing numbers proposed are not included in the Council’s 5-year housing supply. As an area of search, it is considered that the site is developable over the plan period.
Summary of key issues raised by residents and other stakeholders

### Support for regeneration of the seafront.

### Comments on coastal defense and flooding:
- Flood defences on the seafront are inadequate and the Council’s coastal protection policy should be revisited.
- Adequate sea defences should be designed into the plan for Hayling seafront.

### Comments relating to tourism:
- Reference to the decline in tourism is not backed up by quantifiable data with regard to visitor numbers nor is there evidence of the need to cater for day or long term tourists only.
- Visitors are attracted by the unspoilt nature of the seafront and losing this will deter visitors which may affect local businesses and their ability to operate.
- Public Art is unlikely to draw in new tourists.
- The street scene should be consistent and conducive to tourism.
- Excessive parking charges act to discourage visitors.

### Further development of the seafront or visitor attractions will increase pressure on the A3023 which is already beyond design limit:
- Development should only go ahead if there is sufficient road infrastructure to take extra traffic.
- Until the results of the TA are known any development should not be considered feasible or deliverable.
- Congestion on the A3023 is the cause of decline in tourism.

### Development of the seafront will not benefit the island and increase the strain on existing infrastructure.

### Comments on local sustainable transport infrastructure and accessibility:
- Public transport links should be established to allow easy movement between Eastoke Corner, Beachlands and the Westbeach area. Particularly connections to the Hayling Ferry should be considered. Plans should ensure that future sustainable transport links (including Hayling Railway) are protected within the plan.
- Free access should be maintained along the entire length of the seafront promenade.
- Ensuring that the Hayling Ferry is maintained is crucial to link the accommodation on offer in Hayling to the attractions available in Portsmouth.
- Greater consideration should be given to wheelchair accessible access to the seafront.
- Running, walking and cycling are key leisure activities that should be promoted. Loss of carparks that access the seafront routes will lessen accessibility for these users who bring economic gain to the Island.

### Comments on design and character:
- Building flats and shops will not improve the look of the seafront and will spoil views of the sea.
- Policies should be modified to ensure that development of characterless buildings is prevented.

### There should be no further development of the beachfront but the crescent by the funfair should be upgraded/refurbished.

### Comments on ecology:
- Development of the seafront will mean further loss of habitats for waders and Brent Geese.
- Concern over recreational disturbance to areas designated for nature conservation value. Robust mitigation measures should be included.

### All carparks need resurfacing.

### Be more specific about plans to develop Council owned land.

### Current development plans provide for limited land area for leisure activities. Funding and more creative plans should be sought/developed to maximise the land available for leisure activities.
With regard to the council's plan for 'leisure facilities' I would echo the comments of Richard Coates in the Hayling Islander. These developments are all about further housing. It would be sad to lose the only car park on Southwood Road with direct access to the sea, with the loss of this area, HBC also lose a regular income for a short-term gain. I really do wish the leisure plan was more insightful and innovative, given the pedigree and fantastic environment we have.

A tidal swimming pool on Hayling Seafront, a nice prom (accessible for all abilities) along some of Hayling beach for easy walking by the sea, and a basic pier (funded via the Hayling developments), would be superb. The latter could be used to watch windsurfing events etc.

A museum celebrating Hayling as the Birthplace of Windsurfing would be an excellent fulcrum and this enhanced profile will give a worldwide status to the Island.

**Comments about specific Hayling Island Seafront regeneration sites - please see table on 'Hayling Island Seafront (Creek Road), (Eastoke Corner), (Beachlands), and (West Beach)'**

**Comments involving the wider Hayling area - please see table on 'Hayling General'**

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage.

The Draft Local Plan clearly acknowledges the unanswered questions on transport, and indicates that development proposals on Hayling Island and Langstone should continue to be resisted. The site allocation policies included within the Draft Local Plan are only intended to provide a starting point on the detailed points that should be considered on the site, and do not change the council's position that development proposals on these sites should be resisted whilst uncertainties remain regarding vehicular transport. There is a large text box above every proposed allocation on Hayling Island setting this out.

The policy as proposed in the regulation 18 draft should proceed, with wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses, as well as comments received on specific sites within the scope of the Hayling Island Seafront Regeneration Policy (KS4).

In addition, consider whether policy should be amended to:

- Create greater scope for the provision of leisure activities in line with Policy E3
- Promote full accessibility to the seafront areas for all users
- Strengthen wording relating to design considerations within regeneration zones (SPD/design guide)
- Include any flood defence schemes proposed by the Eastern Solent Coastal Partnership where they fall within regeneration zones
- Consider whether any increase in tourism will require further mitigation due to recreational disturbance.
- Provide greater support for future expansion of the Hayling Railway

Further evidence that may be required:

- Tourism analysis to assess visitor patterns and needs.
- Parking study to confirm the use of council owned carparks and their financial sustainability

Comments where no change is considered necessary:

Flood risk has been identified as a possible constraint to development. Details of any mitigation required under policy E12 will be considered at the point of any application for development of the site.
Ecological matters have been identified. Details of any mitigation required under policy E15 will be considered at the point of application for development of the relevant site.

The background section of the policy notes the mixed character of the seafront and the need to preserve the existing character where possible.

Parking charges are not a matter that the Local Plan can consider.

Allocations within the Draft Local Plan are aimed to give guidance on the principle of development on the site and a framework for assessing planning applications. Further detail with regard to the proposed development of the sites will be provided at the point of any planning application.

Any development of public realm improvements and capital investment projects will be considered at application stage once funding arrangements and available funds are fully explored.
Support of development of underused NAB carpark.

Both the NAB carpark and Community Centre carpark are used and should be retained.
- Concern raised as to where parking will be provided for users of the community centre.
- Parking benefits local businesses and loss of parking will result in loss revenue for local businesses.

Access through the NAB car park site to the beach is important.

The community centre is currently cheap to run, re-provision of the community centre may make it more expensive to users.

Site is prone to flooding and should not be developed for housing/further sea defences are required. Will a permanent pumping station be included to prevent issues of flooding should they occur?

Publicly accessible toilets should be retained.

Concern over provision of affordable housing and associated anti-social behaviour.

Ownership of boundaries and maintenance of such should be confirmed.

The island is short of recreational facilities for children and the playpark should be retained to ensure a safe area for play.

Building homes in this area is unsuitable due to distance from local amenities.

A water refilling station should be included in the policy.

**HBCs proposed way forward for Regulation 19 HBLP2036**

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No site specific matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The policy as proposed in the regulation 18 draft should proceed, with minor wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses. In addition, consider whether policy should be amended to:

- Further consider the need to redevelop the community centre
- Provide parking for current carpark users with particular regard to impact on local businesses
- Retain a safe playing area for children
- Include a requirement for publicly accessible toilets to be retained
- Provide for continued public access to the beach front at the NAB car park location
- Provide a water refill station as part of any publicly accessible development

Comments where no change is considered necessary:

- Affordable housing would be required in line with Policy H2
- Ongoing maintenance of any new development is secured through policy IN4
- Flood risk has been identified as a possible constraint to development. Details of any mitigation required under policy E12 will be considered at the point of any application for development of the site
Summary of key comments raised by residents and other stakeholders

Site is prone to flooding and should not be allocated for housing.

Publicly accessible toilets should be retained.

Eastoke Corner is increasingly important to the island’s visitor package.

Eastoke Corner is important to the future of the Hayling Railway.

The road network at Eastoke Corner should be rationalised to allow for landscaping and pedestrian use as well as carparking.

The Plaza area should have designated seating areas and be available for local vendors, particularly when music events are taking place. A tourism strategy can be developed through pop-up stalls without permanent structures being needed.

The Hayling Railway building is out of keeping with the area/unattractive and should be re-sited.

The Council should enforce a more visually pleasing outlook for the Hayling Railway.

Eastoke Corner already provides good facilities and redevelopment will not enhance the area.

Parking should be retained outside the Rails Lane Shops to ensure no adverse effects on local businesses.

Instead of reconfiguring the highway the existing layout should be enhanced with trees in the central part of the highway.

The need for a water re-fill station should be included in the policy.

Artwork on building walls would enhance the visual value of the area.

Understanding of the use of this area by waders and Brent Geese is vital to ensure appropriate mitigation is provided.

Comments about specific Hayling Island Seafront regeneration sites or the regeneration of the seafront in general - please see tables on ‘Hayling Island Seafront (Creek Road), (Westbeach), (Beachlands) and (General)’.

Comments involving the wider Hayling area - please see table on ‘Hayling General’

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The policy as proposed in the regulation 18 draft should proceed, with wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses, as well as comments received on specific sites and the general approach within the scope of the Hayling Island Seafront Regeneration Policy (KS4).

In addition, consider whether policy should be amended to:
• Provide a requirement for publicly accessible toilets to be retained
• Include provision of a water refill station
• Retain parking outside the Rails Lane Shopping area
• Provide greater clarity as to the future of the Plaza area, provide greater certainty as to the tourism strategy for the area
• Remove the Hayling Railway building from the site allocation area

Comments where no changes are considered necessary:

• The design of the Hayling Railway building has been approved and built prior to the higher design standard expected in the designated regeneration zone
• The design standard of new development in the regeneration zone is considered in the Hayling Seafront (General) Summary
• Flood risk has been identified as a possible constraint to development. Details of any mitigation required under policy E12 will be considered at the point of any application for development of the site
• Mitigation related to Brent Geese and Solent Waders is set out in Policy E17
Summary of key issues raised by residents and other stakeholders

The existing fun fair is a key attraction to both residents and tourists and sustains tourism in the area and as such should not be re-developed.

Re-development of the funfair will remove the destination for the Hayling Railway and may affect its popularity.

Development is contrary to policy E14 with regard to development in a Coastal Change Management Area. If more development is built to the west then this will have to be protected at additional cost.

If the funfair closes then re-development of the area should be for open space and could include elements such as boating lake, gardens, seating areas, tea rooms and unusual shops.

Due to the location, development of this area will result in upmarket high cost housing.

Support for development of the site for housing, leisure and retail.

The site is suitable to accommodate greater housing numbers. Allocating the site for up to 150 dwellings will:
- Make it possible for the site to meet the associated infrastructure costs
- Allow more efficient development of the site in line with policy H3
- Further help meet the Council’s housing need
- Allow greater scope for the site to provide some form of landmark in design terms

Development of the area for housing is out of keeping with the character of the seafront.

Question raised as to whether the funfair can be deemed unviable with regard to current policies DM2 and DM3.

Plans should include provision of a new visitors centre and space for educational purposes/field trips.

The funfair does not provide a negative first impression for visitors as suggested at paragraph 3.74.

Support for tourist accommodation including a hotel and self catering units.

The approach to Beachlands seafront should be unconstrained by buildings but instead use landscaping and publically accessible water features to enhance the coastal setting.

A more diverse food and drink offering in smaller intimate retail spaces would be more effective in attracting year round usage.

If the funfair is lost then an alternative attraction of equal effectiveness must be provided in the form of an aqua centre.

It is disappointing to see that the Council is using the loss of the National Watersports Association (NWA) to upsell Beachland.

Comments about specific Hayling Island Seafront regeneration sites or the regeneration of the seafront in general - please see tables on ‘Hayling Island Seafront (Creek Road), (Eastoke Corner), (West Beach) and (General)’.

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The policy as proposed in the regulation 18 draft should proceed, with wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses, as well as comments received on specific sites and the general approach within the scope of the Hayling Island Seafront Regeneration Policy (KS4).

In addition, consider whether policy should be amended to:

- Adjust the developable area in-line with Coastal Change Management Areas and give further consideration to coastal management processes
- Include provision for a replacement visitor centre
- Ensure the approach to the seafront is unconstrained by buildings so that the connection and view to the sea can be maintained
- Include provision for greater leisure facilities on the site

Comments where no change is considered necessary:

- Exclusion of housing and other commercial development on the site would make funding of public realm improvements unfeasible
- Retention of the funfair is outside of the control of the Local Authority
- Affordable housing will be required in accordance with policy H2. The cost of market housing will be defined by the market conditions at point of sale
- Provision of diverse food and drink offerings is already provided for in the plan. The exact provision will be market-led
- Reference to the requirements of the existing tourism policy are not applicable in regard to the Draft Local Plan. Policies within the draft plan are expected to supercede the currently adopted policies
# Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
</tr>
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<tbody>
<tr>
<td>Support for development that benefits watersports users.</td>
</tr>
<tr>
<td>Development should occur as quickly as possible.</td>
</tr>
<tr>
<td>Consideration should be made to beach hut owners when making planning decisions.</td>
</tr>
<tr>
<td>The removal of sea defences has led to beach huts being damaged.</td>
</tr>
<tr>
<td>Use of the carpark by motorhomes and during events restricts local users and beach hut owners.</td>
</tr>
<tr>
<td>Windsurfers do not need extra facilities.</td>
</tr>
<tr>
<td>Watersports users bring limited economic benefit to Hayling Island.</td>
</tr>
<tr>
<td>Development of this area should incorporate a wider range of activities such as swimming and indoor sports.</td>
</tr>
<tr>
<td>Concern that the area designated as a regeneration zone includes a large area of Sinah Common with no explanation of the reason.</td>
</tr>
<tr>
<td>There is no evidence that watersport users have been consulted as to their needs.</td>
</tr>
<tr>
<td>The west beach sea front is not ideal for water sport beginners and is limited to certain tides etc so consideration needs to be given to what other facilities are there for people that are visiting that are not water sports enthusiasts or are spouses/partners or children of water sports enthusiasts that do not participate themselves.</td>
</tr>
<tr>
<td>If a suitable good quality campground with appropriate parking, storage and drying facilities with beach access were available there would be more likelihood of watersport tourists staying longer, and campground revenues would benefit the island financially and in terms of employment.</td>
</tr>
</tbody>
</table>

## Comments about specific Hayling Island Seafront regeneration sites or the regeneration of the seafront in general - please see tables on 'Hayling Island Seafront (Creek Road), (Eastoke Corner), (Beachlands) and (General)'.

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The policy as proposed in the regulation 18 draft should proceed, with wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses, as well as comments received on specific sites and the general approach within the scope of the Hayling Island Seafront Regeneration Policy (KS4).

In addition, consider whether policy should be amended to:

- Adjust the area designated as a regeneration zone
• Ensure provision of parking designated for beach hut users
• Include further provision for non-watersport uses in proposed development
• Include any requirements of coastal change management that may arise from further development
• Provide additional accommodation facilities

Comments where no change is considered necessary:

• The economic benefit provided by watersport users has not been defined. However, the provision of facilities promotes healthy living which is a key Council priority. Additionally the ‘Hayling Island Seafront (General)’ table states that the need for more tourism evidence should be considered.
• The consultation process has allowed watersport users to make representations. There is support for the extra facilities proposed
• Planning must consider the needs of all users, not just beach hut owners
### Summary of key comments raised by residents and other stakeholders

#### Principle of Allocation / its extent and phasing

- Object to / regret the loss of this site to development.
- Support allocation.
- One of few remaining greenfield sites in the area.
- Object based on loss of the gap between Havant and Emsworth - these communities should retain their separate identities / remain separate from each other and from Portsmouth / avoid continuous coastal development.
- The Council gave assurances that there was no intention to develop land between Denvilles and Emworth / the Council signed an agreement that the gap would stay forever.
- Need to understand evidence and funding for this development.
- Site is categorised as best and most versatile agricultural land and should not be allocated.
- This area is currently a green field site consisting of countryside, trees and hedgerows, and this development would be out of character with the current surroundings.
- It would result in the loss of open spaces, countryside and natural habitats (TPOs and mature trees, Bechstein bats, there are common reptiles and nesting birds on this site, high quality hedgerows on this site).
- This site has a stated capacity for 2000+ homes with plans to be developed in a sustainable manner. It is therefore wrong to build only half capacity here and instead make up government target shortfall with a cherry-picking approach picking on piecemeal developments that greatly impact on the community.
- Site is totally unsuitable for development; More suitable sites for development need to be found which will have far less impact on the surrounding environment and have an infrastructure capable of supporting the proposed developments.
- Emsworth should be protected as a fishing village.
- Consider that the GVA viability evidence supporting the masterplan is incomplete - viability tests need to confirm potential returns from the proposed development more accurately. (detailed suggestions made).

#### Extent and Phasing

- Suggest parcel of land to the west of Horndean Road should form a stand-alone allocation.
- Land to the south of the A27, which will be made accessible through the infrastructure delivery associated with the A27, could come forward separately.
- Support for exclusion of Coldharbour farm from site area
- Large sites often deliver fewer homes and at a slower rate than originally envisaged. Suggests the over allocation of sites to ensure that the housing requirement can be delivered as a minimum.
- The GVA viability report has errors of detail and does not address phasing. Viability is not demonstrated by the GVA report and further work is needed
- Number of dwellings proposed should be reduced
- Infrastructure must be delivered before the development
- Development must be restricted if the A27 junction does not proceed
- There is scope to increase the density of housing on this site, to make infrastructure delivery more viable and avoid development on smaller more sensitive sites in the area
Council have already ignored their policy for comprehensive development on this site by allowing development on Land West of Horndean Road

Support requirement for a comprehensive scheme for the strategic site, as it will result in a more cohesive development and ensure adequate services, amenities and infrastructure are provided.

If of 2100 units scheduled for Southleigh only 1100 would be delivered by 2036, is it beyond the scope of the HBLP to allocate land for development beyond the 1100 units?

We are aware there is uncertainty about the rate of development across the District as a whole. In particular, it is evident that the site known as Southleigh has serious infrastructure issues.

Site yield assumes that this strategic site can only drip feed 50+ houses per year during the plan period. 100 a year should be assumed. This would also support infrastructure provision.

### Transport and other Infrastructure

Concern over increased traffic in the area, especially on Southleigh Road and the area around Warblington crossing gates, as well as strategic road network more generally, exacerbating existing congestion.

Concern over road safety at Warblington School.

Site Opportunities and Constraints should include opportunity to provide a development which focuses on the use of sustainable non-car modes to access and move around the site.

Point d i) Need to ensure that the delivery of a ‘sustainable community’ includes transport sustainability and positively plans for walking, cycling and public transport.

A relief road is urgently required.

Need for a broader review of the use of Warblington train station and facilities, to cope with increased demand from the Southleigh site, including the current lack of any layby for pickup/drop off, a footbridge for pedestrians and absence of any toilet facilities.

HBC must be clear on the commitment of public funding and public delivery of the A27 junction. This is fundamental to the masterplan vision. It is also fundamental to clear knowledge of intended phasing of new homes and other infrastructure.

It is absolutely vital that the junction onto the A27 is actually built.

The new link road is a priority. This road should be built before any new developments in the Southleigh area are given planning permission. It will relieve a huge amount of pressure on the existing roads.

Policy should include clear trigger for the delivery of a Junction from the A27 (suggest early phases of the development).

Schools, doctors and hospitals are at capacity.

The Local Plan should not prescribe one single outline application for Southleigh, but rather apply the principle of a Development Brief that can guide the submission of phased schemes.

Landowners/developers are going to make significant profit - land value uplift should be captured for the good of the community; Government must be lobbied for this.

Pressure on infrastructure (community, social, transport) - How will improvements be infrastructure be funded?

The idea of another junction to/from the A27, which would mean two junctions within a kilometre of each other, is not plausible.

How will developers be compelled to deliver the infrastructure?

Ahead of the Revised Draft Local Plan and/or a planning application submission Highways England would like to work with the council to assess the deliverability of the Southleigh site and the proposed new access onto A27. Given the potential impact of the development on the A27 it would be expected that any potential adverse impacts to the safe and efficient operation of the SRN be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3, as well as the NPPF and Circular 02/2013. To date, Highways
England have not seen any evidence that a new access onto the A27 to facilitate growth at Southleigh is deliverable and could be designed in conformity with the Design Manual for Roads and Bridges. We would welcome further discussions on this policy. Until this has been done, there is a risk that the policy would not be sound if growth at Southleigh is reliant upon a new access onto the A27 to be deliverable.

HCC support the use of a Masterplan for the site in order to coordinate land-use and transport and to ensure that the delivery of a 'sustainable community' includes transport sustainability and positively plans for walking, cycling and public transport. However there is no evidence that the provision of bus routes to serve the site is a commercial proposition for the local bus companies or that the development can deliver cycling and walking connections to the local shops, facilities and railway stations which therefore puts into question the whole tenet that a development of this number of dwellings can actually be sustainable in transport terms and not rely solely on the private car.

Point d iv) Evidence has not yet been provided (in the form of the borough wide Transport Assessment or planning application TA) to prove that a new junction on the A27 is needed. In addition there is no guarantee that the development of 2,100 dwellings can fund and deliver a new access to the A27 therefore if the junction is essential for the development then additional ways to fund the junction will need to be investigated.

Point d viii) There is also no evidence that providing additional bus routes to serve the site is a commercial proposition for the bus companies.

Concerns over drainage implications for Chichester Harbour - development should not result in pollution of the Harbour or flooding problems in the area.

The south east section of this site is designated as a Flood Zone.

Flood attenuation ponds should be managed to avoid mosquito problem and the associated health risks.

Maintenance of SuDS by community / management companies could be problematic.

Concern about flood risk / High water table / presence of springs makes surface water drainage problematic.

The Environment Agency has previously raised concerns regarding this site and some of the issues around flood risk and specifically flood storage. The site opportunities and constraints refer to areas of Flood Zone 2 and 3, in addition to land which is safeguarded for flood storage needed to reduce the probability of flooding to properties in Selangor Avenue. It is not clear, however, how these constraints have been taken into account in assessing the suitability of the site for development, or in shaping the policy requirements. We strongly recommend that the Local Plan better reflects the flood risk both in the policy wording and supporting text/evidence base documents. The flood easement area should remain free of development and any supporting flood risk management infrastructure, including surface water management (attenuation basin and other sustainable drainage measures).

We will look at any proposals for development to ensure that there is no increase in flood risk to downstream properties or further burden on public expenditure from increased maintenance and operation of publicly maintained structures.

Taking account of the above we would suggest that the assessment of the site and its policy within the sustainability appraisal is drawn into question in relation to objective 5 (reduce flood risk). We would not agree that the site and its criteria are going to have a positive effect on flood risk. As it currently stands it is likely that the effective will be a negative one.

**Other issues causing concern**

No faith in proposed plans, as recent developments have been poorly planned and many promised improvements have not been delivered (eg Warblington foot bridge; traffic calming; insufficient parking; play spaces).

There is no consideration of the impact on the lives of the existing residents.

Concerned about noise impact of spine road.
Concern that development will interrupt green corridors and restrict wildlife movement from the coast to the South Downs.

Concern over sufficient consideration being given to wildlife (incl trees, hedges, open spaces) in design, development and maintenance of the site.

Concern over loss of privacy / noise nuisance / reduced quality of life / loss of peace & quiet / reduces security in existing adjacent developments.

**Development Requirements / Masterplan details**

The status of the masterplan is unclear (lack of clarity and justification). It does not provide enough clarity and direction for prospective developers. In order for the document to have significant weight, it should be subject to formal public consultation and be itself formally adopted as policy.

Supports the proactive approach of Havant BC in producing masterplan.

From a connectivity point of view, it should be considered that Emsworth Station could be used as a transport link with regards to getting to/from the Southleigh site. Network Rail should be consulted.

Natural England strongly recommends that a comprehensive ecological mitigation strategy is secured for the site that achieves net biodiversity gain and this requirement should be included in the policy text.

Would like public house included on site.

Masterplan should include facilities and activities for older children / young people.

Would like walking links to the coast directly south of the site.

There is a missed opportunity in having a clear walking / cycle / road routes to Emsworth & Havant train stations that would encourage people not to use their cars to commute to work.

Proposed green space in the Southleigh Master Plan should receive protection from any further development by being appropriately designated.

Public open space within the site should take pressure off Chichester Harbour, in particular it should be designed to be attractive to dog walkers.

Spine road should pass through proposed local centre to support the businesses.

Site should be developed using the principles of shared space for cars, cyclists and pedestrian.

Consideration should be given to requiring a secondary school.

Support requirement for primary school.

Will a school bus be provided for the school recommended in the plan?

Consideration should be given to requiring a doctor’s surgery.

Criterion d does not currently make reference to the use of land to the south of the A27 for commercial and highways services uses, as set out on the Masterplan.

Open space should be in the middle of the site, separating the two communities.

Open space should have wild elements, not just orderly man-made open space.

Homes will not be affordable to local people.

Why high density housing here? Other areas are far less developed.

Support for requirement to contain community food growing provision.

Suggest part of site should be specifically for affordable / low cost housing for first time buyers.

Sufficient parking (for visitors as well as occupiers) must be provided.

Lack of attention to existing heritage features (listed buildings).

There should be an amnesty strip around existing houses.
Support that masterplan on East side of Eastleigh Road has tempered the desire to obtain the best views for the developer of Southleigh House with those of existing residents.

Detailed suggestions made for alignment of the spine road.

Extra Care should be provided in site

Green areas should be more fairly and evenly spaced out on the new development. The current plans seem to show a significant bias of areas to the East. Area of green on the west side should be widened and a significant corridor created.

Question final masterplan option - suggest that more people wanted a separate settlement.

The original parkland to the south of Southleigh Park House must be protected from inappropriate development that would harm the setting of the listed building and the open character of the historic parkland.

Historic England welcome criteria b i and d xii of Policy KS5, but consider that the Policy should require the retention of the properties on Eastleigh Road and the settings of all the listed buildings (grade II listed 1 and 2, Eastleigh Road, and is potentially within the setting of the grade II listed East Leigh Farmhouse, the barn to the to the west of the Farmhouse, Southleigh Park House and the Clock Tower Building in Southleigh Park) to be respected in any masterplan/development brief, allocation policy or development proposals for this site in accordance with the protection afforded to designated heritage assets by the Framework. HE would also like to see a requirement in the Policy for proposals to actually be informed by the Heritage (Impact) Statement.

Given the acknowledged “high potential for previous unidentified archaeological deposits”, a detailed archaeological assessment should also be required with a planning application and, if not included within the Master Plan principles, Policy KS5 should include a requirement that, wherever possible, archaeological remains are preserved in situ, preferably within areas of open space. Has reference been made to the Hampshire Historic Landscape Assessment?

Density of development here should be taken into account when further North Emsworth development is under consideration.

Masterplan lacks rationale and justification for the link road.

Given function of spine road, it seems unlikely that this road will ever be as suggested in masterplan.

There is no justification for the route of the spine road and no alternatives discussed.

Number of units should be increased South of Southleigh Road to decrease density in northern half of site

Existing cul-de-sacs should not be opened up as through roads.

Roads in Manor Farm development are privately owned and maintained. Pedestrian and cycle links to/from Southleigh would cause upkeep and liability issues for private individuals.

If flats are to be built, the flats are central to the development or along the motor way for ease of access to major roads.

Local centre should be more central to the development.

Concerned about suggestion of higher density development close to existing farmstead.

Support capping of Eastleigh Road in Masterplan.

There are potentially major conflicts between the implementation of a new engineered link road for commercial traffic with associated infrastructure, and (i) residential amenity, (ii) the safe east-west movement of pedestrians and cyclists across Southleigh, and (iii) the protection of the historic parkland. There is no estimate of the volume of traffic that may use the road.

Little consideration has been given to traffic coming from Denvilles (Southleigh Road) and heading north and west. Since this traffic cannot use Eastleigh Road it will go along the blue neighbourhood street that is proposed to the NW of Eastleigh Road. The new road is likely to become a rat-run, just like Eastleigh road is now.
The site has no existing on-site rights of way. HCC suggest that a requirement of development at this location should be the development of high-quality multi-user routes in green corridors going both east-west and north-south, linking into the existing rights of way network, where appropriate. In addition, Havant Footpath 71 crosses the south-eastern corner of the site, providing a convenient crossing under the A27. Providing additional cycle access rights over this route will help support sustainable travel between Emsworth, Southleigh and permissive routes across Southleigh Forest. HCC therefore request that this policy is amended to protect this route, and provide additional pedestrian/cycle links to it, where possible.

The creation of 2,100 new homes within 1.25-3km of Staunton Country Park, which is a HCC Countryside Site, will substantially increase the recreational pressure upon this asset. To mitigate for this impact, we request that a substantial contribution towards enhancing the country park form part of the allocation policy.

HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The site is capable of delivering around 12% of the housing need for the plan period. The council is satisfied that the evidence base supports an allocation for a site yield of around 2,100 dwellings, which was based on extensive masterplanning work. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether and how the policy and/or the masterplan should be amended to:

- Address the concerns of the Environment Agency and others regarding flood risk, flood storage and drainage. The Council will work closely with the Environment Agency to improve the evidence base and the policy to resolve these concerns
- Require a comprehensive ecological mitigation strategy and achieve net biodiversity gain
- Protect green spaces provided within this development from future development
- Make clearer reference to the intended use of the Land to the south of the A27
- Make clearer reference to the need to retain heritage assets
- Bring forward deliverable solutions to site access and permeability

The trajectory (AMR 2017) shows 100 dwellings per annum for Southleigh in years 2025/26, 2026/27, 2027/28, and 800 for 2028/29 - 2035/36 giving a total of 1,100 in the plan period.

It remains the Council’s ambition to deliver a comprehensively planned scheme for this site and avoid further parcelling off of smaller sites. While this approach remains fundamental to planning of this site, it is acknowledged that phasing is crucial to the successful delivery of large sites. Therefore, there is a need to consider further how phasing and triggers can be reflected better in the evidence base (viability assessment and masterplan) and in the policy itself, or through additional planning documents. Any such phasing plan will also have to consider the delivery of infrastructure relative the timing of development phases.

The Infrastructure Delivery Plan (IDP) which accompanies the Local Plan looks specifically at the infrastructure needs of the Southleigh site. Infrastructure items that need to be delivered on site, such as the primary school, have been identified in the policy, so that developers have the clarity from the outset that they will be expected to provide them within the development. In terms of transport infrastructure, the impact of this development on the surrounding areas, and any mitigation measures, including the proposed A27 junctions and link road are being examined through the Borough wide Transport Assessment (TA), which will inform the next version of the plan.

The following detailed matters raised in the comments, while being considered in the masterplan, are also for consideration in further detail at the site planning stages and are covered by policies in the Local Plan:

- Detailed design (E6 and E7)
- Provision on site open space and wider green infrastructure (E2)
- Landscape and Townscape (E10)
- Transport and Parking (IN2)
- Site specific impacts on the road network (IN3)
- Access and through routes (IN3)
- Residential amenity / Noise (E6 / E20)
- Wildlife / Ecology (E15 / E18)
- Solent Special Protection Area (E16)
- Historic Environment and Heritage Assets (E9)
- Drainage and Flood Risk (E12 / E13)
- Affordable Housing and Housing Density and Mix (H2 / H3)
<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy is supported including extension to include the 3&lt;sup&gt;rd&lt;/sup&gt; phase.</td>
</tr>
<tr>
<td>Dunsbury Park business development looks excellent.</td>
</tr>
<tr>
<td>The local MP and council leadership are promising thousands of high end new jobs from Dunsbury Park on the basis of one translocation of a distribution centre of a Havant based business (Fat Face). Some residential development on Dunsbury Park site could save greenfield sites elsewhere in the borough.</td>
</tr>
<tr>
<td>Phase 3 has potential to conflict with the success of the woodland &amp; protected species mitigation / compensation strategy for Bells Copse and Havant Thicket - need to consider in-combination effects on woodland and protected species.</td>
</tr>
<tr>
<td>Phase 2 has capacity to provide up to 15,000 sq. m (increase from 10,000 sq. m).</td>
</tr>
<tr>
<td>Relaxation on use class restriction is supported and reflects current s73 application under consideration.</td>
</tr>
<tr>
<td>There is a need for sufficient transport links to/from Dunsbury Park.</td>
</tr>
<tr>
<td>Need to recognise the importance of the motorway bridge over the A3(M) as a green infrastructure route, with a large residential population within a 4.5km cycling catchment west of the motorway and potential for health and wellbeing benefits.</td>
</tr>
<tr>
<td>Amend (i) (viii) to refer to the need to; enhance green infrastructure routes between Havant Thicket Reservoir, Dunsbury Park and Cowplain.</td>
</tr>
<tr>
<td>Improvements to cycle infrastructure could increase the number of journeys to work by these means.</td>
</tr>
<tr>
<td>Policy should be strengthened to require cycle access to active travel routes (other than Park Lane).</td>
</tr>
<tr>
<td>Recommendation for a comprehensive mitigation strategy to ensure that net biodiversity gain and appropriate mitigation is required for Bechstein’s bat and hazel dormice. Need to ensure the importance of this site within wider ecological corridor for woodland and wetland habitats.</td>
</tr>
<tr>
<td>Need to integrate mitigation measures for Bechstein bats within the design and layout, including existing bat corridors.</td>
</tr>
<tr>
<td>Mitigation measures for Bechstein’s bat are not tested - need for long-term monitoring.</td>
</tr>
<tr>
<td>Welcome requirement for Heritage Statement but would like to see a requirement in the policy for proposals to be informed by the Heritage (Impact) Statement.</td>
</tr>
<tr>
<td>Given the potential impact of the site on the A27, it is requested that any potential adverse impact to the safe and efficient operation of the Strategic Road Network (SRN) is appropriately considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013.</td>
</tr>
<tr>
<td>Add poor access for walking and cycling as a site constraint, with no link from the site westwards across A3(M) towards Waterlooville by foot, cycle or bus.</td>
</tr>
</tbody>
</table>

**HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor amendments. In addition, consider the following:

- Whether the part of the policy relating to Phase 2 should be amended to allow for up to 15,000 sq. m of employment floorspace.
- Reference the bridge crossing on the A3(M) as an important pedestrian and cycle route in the Site Opportunities and Constraints.
• Reference the potential to enhance pedestrian and cycle links in the Site Opportunities and Constraints.
• An additional criterion to ensure the safe and efficient operation of the SRN.
• Whether there is a need to amend the policy to reflect the significant archaeological potential of phase 2, and include developer requirements for mitigation.

Explore whether policy should be strengthened to refer to / require improvements to provide access to other active cycle routes.

The forthcoming Havant Biodiversity Strategy will consider the importance of this site within the wider ecological corridor for woodland and wetland habitats informed by the ecological network mapping work undertaken by the Local Nature Partnership (LNP). The policy as proposed, including the developer requirements will therefore be updated to reflect and incorporate the recommendations of the forthcoming Havant Borough Biodiversity Action Plan (BAP) as appropriate.

Investigate whether there is a need for long-term monitoring measures for the Bechstein’s bat with the mitigation measures proposed in accordance with E18. Consider whether there is a need to strengthen the policy wording relating to mitigation measures as part of the overall design and layout of the proposed development.

Comments where no change is considered necessary:

As well as meeting objectively assessed housing needs, the Draft Local Plan must also meet the Borough’s employment floorspace need of 82,780 square metres (as set out through Policy C1). Dunsbury Park is a strategic employment site of sub-regional and local importance which has the potential to meet a significant proportion of the Borough’s employment floorspace requirements, and is accessible from the A3(M).

There are various provisions within the S106 agreement and Framework Travel Plan attached to the outline consent (reference. APP/12/00338) which are designed to improve pedestrian and cycling links to and from the adjoining residential areas. This includes pedestrian and cycle links to the south and east of the site towards Leigh Park and an A3(M) footpath/cycleway to the west towards Waterlooville.

The Travel Plan requires the development plots to maximise opportunities for travel to the business park and hotel development by means other than the private car. Accordingly, criterion i. x. of the policy requires a Travel Plan for each plot and/or phase to be submitted in line with the Framework Travel Plan. The Framework Travel Plan also sets out a strategy for cycling to encourage staff to cycle to work.
<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increasing the capacity of the college is supported.</td>
</tr>
<tr>
<td>Increased requirement for public transport.</td>
</tr>
<tr>
<td>Havant Bridleway 28 and Havant Footpath 26c adjoins South Downs College. HCC request that this policy be amended to require additional pedestrian/cycle links to the local rights of way network, where possible.</td>
</tr>
<tr>
<td>Add that development at both campuses must support sustainable travel modes with excellent pedestrian and cycle links and bus facilities.</td>
</tr>
<tr>
<td>Havant Campus - Add to criterion f. and 'promotes access by walking and cycling through the provision of shared off-road routes and improved crossing facilities on the B2149 Petersfield Road and Petersfield Road/New Road roundabout'.</td>
</tr>
<tr>
<td>South Downs site - Add to criterion g. and 'promotes access by walking and cycling through providing off-road shared use cycle routes, an improved pedestrian route from the site to Crookhorn bus stops including a signalised crossing facility at the college entrance'. Also need to improve bus stop facilities on College Road and work with bus companies to ensure the site is adequately served by a number of bus routes.</td>
</tr>
<tr>
<td>Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether it would be appropriate to secure developer contributions towards improved pedestrian and cycling routes and bus facilities/stops as part of the development and redevelopment at the two campuses.</td>
</tr>
<tr>
<td>Support efforts to address the skills gap through draft Policies KS7 and KS10 requiring high quality design in the provision of new and improved educational facilities, and an inspiring built environment.</td>
</tr>
<tr>
<td>HBCs proposed way forward for Regulation 19 HBLP2036</td>
</tr>
<tr>
<td>In addition, investigate opportunities to strengthen sustainable transport links at, and between the two campuses in collaboration with Havant and South Downs College.</td>
</tr>
<tr>
<td>Summary of comments raised by residents and other stakeholders</td>
</tr>
<tr>
<td>---------------------------------------------------------------</td>
</tr>
<tr>
<td>Support principle of the reservoir and pipeline route.</td>
</tr>
<tr>
<td>Concern over residual flood risk to development downstream and the reservoir should therefore be justified sequentially in terms of its location, and catchment-wide flood probability and consequences understood and mitigated.</td>
</tr>
<tr>
<td>The route of the proposed pipeline follows, to a large degree, the route of existing main rivers. Any works within 8 metres of a main river require a Flood Risk Activity Permit from the EA.</td>
</tr>
<tr>
<td>Impacts upon the rights of way network and nearby country park should be considered. Any diversions should provide a high-quality route.</td>
</tr>
<tr>
<td>A comprehensive mitigation strategy will be required for this development to achieve net biodiversity gain and address the site’s constraints which include impacts to ancient woodland, Bechstein’s bat and hazel dormice and to ensure the strategy secures landscape scale biodiversity enhancements. Mitigation measures should be in place at the earliest opportunity. There is potential for this site in combination with KS6 to significantly impact the viability of the local Bechstein’s bat population.</td>
</tr>
<tr>
<td>Concern that the current wording of Policy E18 may create a barrier to obtaining planning permission for the Havant Thicket Reservoir. The development of KS8 will not be able to show no net loss of woodland; instead Portsmouth Water’s mitigation strategy would be focused on ensuring that connectivity is maintained between the woodland blocks north and south of the proposed reservoir by planting a new woodland strip east of the reservoir and enhancing boundary hedgerows.</td>
</tr>
<tr>
<td>The Park and Garden is Grade II* Registered, not a Grade II* listed building as the third bullet point states. Points (l) should be headed “Natural and rural character and historic significance”.</td>
</tr>
<tr>
<td>The construction of this proposed reservoir would result in the loss of part of the historic Avenue, part of the Registered Park and Garden, and Conservation Area. Whether this loss would amount to “substantial” harm and whether the public benefits of this proposal are such as to outweigh the harm are matters for full and proper consideration if and when a formal planning application is submitted, and full details of the proposed reservoir and associated infrastructure are known, but at this stage we object to Policy KS8 based on the site shown on Figure 14a. Points (h) and (i) of the policy should be amended to give more flexibility over potential access arrangements.</td>
</tr>
<tr>
<td>Concern that wording of policy suggests blanket ban on development in the pipeline buffer zone. Proposed wording change.</td>
</tr>
<tr>
<td>More information should be included in the draft Plan on when Havant Thicket Reservoir will be needed.</td>
</tr>
<tr>
<td>The area to the west of the reservoir should be included for regeneration e.g. the flats on Swanmore Road. Parts of the thicket could be developed to provide leisure and a visitor centre to make it a destination in its own right.</td>
</tr>
<tr>
<td>New leisure activities such as a viewing tower or bridge at the reservoir, canoeing/dingy sailing and club house (in partnership with local schools and colleges), and walks around the new reservoir, maybe a café. A walking/cycling route along the new pipeline to the reservoir should be defined now.</td>
</tr>
<tr>
<td>Section 3.118 should be expanded to consider the impact of the Borough as a whole, with provision for housing, which will enhance the environs of the reservoir, and bring possibly more mixed income residents to an area which is one of the most deprived wards in the Borough, as well as planning for the leisure development of the site.</td>
</tr>
<tr>
<td>The site supports features of significant biodiversity interest including priority species and habitats.</td>
</tr>
</tbody>
</table>
Previous survey work has shown that Bechstein’s bat utilise KS8 for foraging; a maternity roost has been recorded using parkland trees adjacent to the site also.

Whilst Portsmouth Water do not predict a deficit in the period covered by the Water Resources Management Plan (meaning that construction of the reservoir would not be necessitated) their capacity to supply water depends upon their resources remaining available.

Supportive of moves to embed resilience, and to deliver regional solutions to water shortfalls which would prevent other potentially damaging schemes being required elsewhere.

The scheme could make a valuable contribution towards ensuring that water resources across the south east are more secure and more sustainable.

Points (i) and (j) in the policy are supported.

<table>
<thead>
<tr>
<th>HBCs proposed way forward for Regulation 19 HBLP2036</th>
</tr>
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<tbody>
<tr>
<td>No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider the following:</td>
</tr>
<tr>
<td>- Whether flood risk has been adequately addressed</td>
</tr>
<tr>
<td>- Full and proper consideration of the loss of part of the historic Avenue, part of the Registered Park and Garden, and Conservation Area</td>
</tr>
<tr>
<td>- Point (j) should reference Rights of Way and ensure new path provision is of high quality</td>
</tr>
<tr>
<td>- Whether an ecological mitigation strategy should be required and specifically referenced in the policy</td>
</tr>
<tr>
<td>- Greater flexibility in points (h) and (i) over potential access arrangements</td>
</tr>
<tr>
<td>- Whether the wording related to the pipeline route should be amended</td>
</tr>
<tr>
<td>- Amend point (l) to “Natural and rural character and historic significance”</td>
</tr>
<tr>
<td>- Amend site opportunities and constraints to reflect correct designation of Park and Garden</td>
</tr>
</tbody>
</table>

Comments where no change considered necessary:

Flood Risk Activity Permits are not within the remit of the Local Plan to address.

The final paragraph in Policy E18 is considered to comply with the Habitats Regulations which a planning application for the reservoir would have to meet.

The timing of the delivery of the Havant Thicket Reservoir is a matter for Portsmouth Water and is not considered necessary to reference this in the policy or supporting text.

The Council do not routinely allocate swathes of privately owned residential areas for redevelopment. Therefore, it would not be considered appropriate to allocate Swanmore Road and surrounding areas for redevelopment.

Leisure facilities are specifically referenced in the policy. Whilst a visitor centre is not explicitly mentioned, it would be supported through the policy. Other leisure activities are not precluded by the policy and would be supported in principle.

The policy requires that regeneration opportunities arising from the new pipe works enhance cycle and pedestrian accessibility.

Concerns regarding ecology will be addressed through an Environmental Impact Assessment (EIA) and Environmental Statement.
KS9 - Berewood and Wellington Park
2 responses were received regarding this topic

Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>The inclusion of the key site is welcomed.</td>
</tr>
<tr>
<td>Suggestion that number of dwellings in the policy is amended to approximately 3,000 new dwellings to reflect approved outline consent for Berewood.</td>
</tr>
<tr>
<td>Flexibility needed to allow for market changes over the course of the build out programme and minor changes to the previously approved scheme.</td>
</tr>
</tbody>
</table>

HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider whether policy should be amended to make reference to 'about 3,000 new dwellings' to reflect the above, and for the purposes of consistency throughout the plan.
<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lack of detail in relation to proposed development.</td>
</tr>
<tr>
<td>Reference to ‘pocket homes’ in news article.</td>
</tr>
<tr>
<td>Concern in relation to traffic impact and journey times.</td>
</tr>
<tr>
<td>Need for sufficient transport links to/from Langstone Technology Park.</td>
</tr>
<tr>
<td>Highways Assessment is not yet complete - need to assess cumulative impact of development.</td>
</tr>
<tr>
<td>Consideration should be given to the use of the Harts Farm way entrance.</td>
</tr>
<tr>
<td>Support increasing employment opportunities on a brownfield site.</td>
</tr>
<tr>
<td>The available car parking area should be highlighted, and options considered for the most efficient use of this space.</td>
</tr>
<tr>
<td>Highways England will review any future consultation once it is available.</td>
</tr>
<tr>
<td>Paragraph 3.135 - Delete ‘public transport hubs’ and replace with to ‘better connect it to Havant town centre and Havant railway and bus stations’.</td>
</tr>
<tr>
<td>Add need to promote access by all sustainable modes including the Bus Rapid Transport bus route.</td>
</tr>
<tr>
<td>Support efforts to address the skills gap through draft Policies KS7 and KS10 requiring high quality design in the provision of new and improved educational facilities, and an inspiring built environment.</td>
</tr>
<tr>
<td>Access to Langstone Technology Park could be improved by slip roads direct onto the A27.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage.</td>
</tr>
<tr>
<td>There have been no site-specific constraints which have been raised which indicate the site is not deliverable or should not be allocated in the HBLP2036.</td>
</tr>
<tr>
<td>As the local planning authority, the Council will also need to independently determine an appropriate and sustainable framework for the delivery of the site including access considerations, and balancing the aspirations of the landowners, owners, tenants and communities. As such there will be substantial revisions to the policy as proposed in the regulation 18 draft of the HBLP 2036, which will incorporate the recommendations from the transport analyses.</td>
</tr>
</tbody>
</table>
Infrastructure
### Summary of key comments raised by residents and other stakeholders

**Amount of thought given to / evidence provided on Infrastructure**

The Infrastructure Delivery Plan remains incomplete until the Highways Assessment is published, critically appraised and solutions, not just mitigation, identified and implemented. Further consultation on IDP requested once Transport Assessment has been completed.

This plan is not thought out properly. Do the people who put planning forward not speak to the local people who know the area?

Object to development / concern about effect proposals for new housing will have, not only on traffic but also on schools, health provision, etc. and whether sufficient thought has been given to these issues.

The part of the report which talks of infrastructure is very mild in tone

Building homes on greenfield land takes away land needed in future for infrastructure

PUSH must continue to establish the cumulative effect of numerous new developments and the considerable increase in population over time in the entire PUSH region so that the wider infrastructure is put in place in a timely fashion.

The limited number of community projects included will only come to fruition on the back of revenues made available by developers to HBC. Therefore the plan is devoid of major infrastructure projects such as:

- Cultural and entertainment centres
- Open town centre meeting places to see and be seen in, including worthy architecture
- Rapid transport networks
- Railway and secondary road improvement and expansion

In previous developments very little was done to create communities. The result of this are characterless morasses of rather unspectacular houses. What plans are there to create community centres, shopping areas, schools and health centres? What are the plans for full and proper staffing, given that there is already a national problem with recruitment to these professions?

The local plan should be about ensuring the current local population enjoy the same, if not better, conditions than that of the past and not just wholly focused on new housing.

So many new houses & flats in the area but what about extra doctors surgeries & hospitals, police & schooling

The Council is pursuing housing over the environment to obtain government revenue, to the detriment of the Borough.

**Policy IN1**

Infrastructure should be in place or in parallel with new development.

Page 74 bullet point f: it is essential that SuDS systems are adequately maintained, so it is good that maintenance is part of the policy.

Southern Water supports the inclusion of Policy IN1, which effectively addresses the need for new development to consider the provision of the infrastructure necessary to support it.

IN1 could be more explicit in its support for utility providers to deliver the strategic level (as opposed to just local level) infrastructure needed to accommodate growth in general, throughout the district (wording suggested)

Add reference in policy to the need for development proposals requiring a full transport assessment. Eg Planning permission will be granted where it can be demonstrated that …. A full Transport Assessment for the new or improved infrastructure has been submitted as determined by the Highway Authority.
HCC welcome that point a.iii. makes reference to public rights of way. HCC do however request that reference is also made to recreational facilities, such as Staunton Country Park and Staunton Farm.

Hampshire County Council as a landowner and a public service provider support the intention to work in partnership, with specific reference to 4.11 (ii) - new and expanded schools.

Support for 4.11 viii on Green Infrastructure

This policy is supported in general terms however the Council must ensure that any infrastructure improvements sought are directly related to the development and meet the CIL regulations. The CIL 123 list should be updated as required.

Support for inclusion of sports and recreation facilities within the types of infrastructure that the council will either seek on site provision of or contributions to off-site provision to make the development acceptable. Playing Pitch Strategy once adopted should be used as the basis for guiding such contributions or on-site provision as it will constitute a robust and up to date assessment of need for sport for the area.

Policy IN1 (vi) Transport is useful, but minor adjustments around a specific site does not deal with the fundamental problem of the overall capacity of the road or its ability to handle any increase in load.

The emphasis on providing the necessary infrastructure before, or simultaneously with, new development is wholeheartedly supported. We recognise that some infrastructure, rather than preceding a development comes about as the result of increased need stemming from, amongst other things, an increase in population. Hence the retention of land to support infrastructure improvements such as for doctors’ surgeries and education facilities is supported. This must be rigorously enforced and not fall victim to the need to demonstrate a 5y housing land supply. It is important that this does not apply simply to infrastructure devoted to that development but includes the wider infrastructure requirements across the local area.

Support for aims of IN1, but policy could be clearer on the expectations for infrastructure planning

There is a great deal of information in the proposed plan on what should be done, guidelines to be followed but much less on solutions to obvious problems.

The policy states that planning permission will be granted for development that meets on-site and/or off-site infrastructure requirements including for water supply, waste water and sewage disposal. In terms of water supply this should include consideration of solutions such as rainwater harvesting and grey-water recycling. As well as significantly reducing the use of treated drinking water, such interventions can deliver additional benefits for localised water management by reducing volumes of runoff or discharges of waste water from a site.

West Sussex County Council support the reference in Policy IN1 to timely on-site and off-site delivery of infrastructure, which includes transport, education, social infrastructure and emergency planning. However, it is considered that this policy should set out the need for phasing development where required to bring forward required infrastructure and state that Havant Borough Council will work with partners in the delivery of infrastructure, which could include providing mitigation outside of the Borough.

Policy / supporting text should acknowledge cross county boundary impacts

Highways England is supportive of policies IN1, IN2 and IN3, which align with the principles of NPPF, its soundness requirements, and Circular 02/2013 and will help to mitigate any impacts of Key Sites 1 and 2 on the SRN.

The Environment Agency supports the inclusion of green and blue infrastructure in this policy and in the supporting text the requirement for developments of 5 or more new homes to be accompanied by a comprehensive infrastructure delivery statement. This should help ensure that relevant infrastructure is provided in the right place at the right time.

IN1 a iii Green and Blue infrastructure should explicitly include cycling and walking

4.6 a Transport and highways should explicitly include cycling and walking.

Amendments suggested to policy and 4.14 to clarify that brownfield sites listed in policy H1 area also considered to be ‘allocated sites’ for the purposes of this policy (wording suggested)
It is noted that proposed housing allocations do not clearly indicate that infrastructure requirements will need to be fulfilled in the granting of planning permission with the exception of Southleigh and those developments which border or are near to Morelands School.

The Education and Skills Funding Agency welcomes reference within the plan to support the development of appropriate social and community infrastructure, and in particular draft Policy IN1

IDP: General Comments

The infrastructure plan failed to fulfil both my hopes and expectations. I would have like to have seen a clearer and more insightful vision, here, both in terms of social and technical infrastructure.

Maps and diagrams should be used to illustrate the planned provision of infrastructure

Appendix 4 titled ‘Infrastructure Solutions’ contains significant risks in the column titled ‘funding shortfalls’. These shortfalls are (a) incomplete in places and (b) where they are known the overall total is already a substantial amount of money. I also note that some of the timeframes listed go beyond 2036.

Early Years

The borough council is asked to note that for every 500 homes approximately 44 new early years places will be required for children aged between 2 and 4. This number could potentially be doubled to meet the demand from working parents who may require places for very young children aged 0 and 1 and for the Government’s 30 hours childcare policy. Therefore these numbers are a minimum. Where smaller developments are noted of typically less than 50 units it is probable that early year’s needs can be met by existing provision. For larger developments, consideration should be given to seeking developer contributions that include the provision of early year’s places. HCC assume these are covered under the council’s policy IN1.

Education

The Education and Skills Funding Agency notes that significant growth in housing stock is expected in the borough. This will place additional pressure on social infrastructure such as education facilities. Ensuring there is an adequate supply of sites for schools is essential.

The Education and Skills Funding Agency supports the principle of Havant Borough Council safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary

In light of skills challenge in the area, it would be helpful if the council (in partnership with the county council) produced a spatial analysis of primary and secondary school performance and social deprivation against proposed areas of housing growth and the provision of new and improved educational facilities. While developer contributions will only pay for new school places generated by the housing development, the improvement of educational facilities may also benefit the local population.

The Education and Skills Funding Agency welcomes the detailed analysis of existing school capacity, ability to expand, needs arising from development and the costs of provision, as set out in the Infrastructure Delivery Plan (IDP). This comprehensive assessment is considered to be a strong basis for the education requirements set out in draft Local Plan policies.

In light of the infrastructure challenges often faced when delivering large schemes (KS5 Southleigh) and delays these can cause in housing delivery, the Council may be interested in emerging Education and Skills Funding Agency proposals for forward funding schools as part of large housing developments. We would be happy to meet to discuss this opportunity at an appropriate time.

Draft site allocation Policies H15, H41, H44 and H45 all require an appropriately scaled contribution to the expansion of Morelands Primary School or the provision of a new primary school. The Education and Skills Funding Agency welcomes this approach, but recommends an update to the supporting text to ensure consistency between the Local Plan and the IDP. At present, the supporting text for the policies refers to the need either for an expansion of Moreland School or the provision of a new primary school within one of the development sites. However, the IDP states that Moreland School can only expand to two forms of entry, while land owned by the borough council and currently used as informal open space would be available for
Further expansion of Morelands School to the three forms of entry required as a result of these housing developments. The next version of the Local Plan should reflect the latest position agreed with the county council.

While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The ESFA therefore recommend the Council consider highlighting in the next version of the Local Plan that: - specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that - requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.

Hampshire County Council as a landowner and a public service provider support the intention to work in partnership, with specific reference to 4.11 (ii) New and expanded schools are planned in conjunction with Hampshire County Council, in liaison with the individual schools.

Consider that estimate of pupil space needs in Emsworth (Table 4, Local Plan) is an underestimate. Suggest estimate should be based on survey of school children at Redlands Grange.

**Emergency Services**

The emergency planning is a joke and needs someone to be accountable for developing it! Currently it’s a list of nice to haves.

Police have not performed well in the past.

**Green & Blue**

The Victorian ethos of providing parkland for all residential areas should be emulated.

Havant should develop its own ‘Green Chain’ as in London.

**Health**

With the amount of houses planned north of Emsworth any new doctors' surgery at Redlands Grange will be oversubscribed before it opens and that means there will still be a need for a surgery in the centre of Emsworth.

Key concern for Clinical Commissioning Group is to ensure that workforce is available to meet the needs of any additional population forecasts. The model of care is changing in order to meet unprecedented demand and in recognition of the fact that GPs are a scarce resource. This influences the way that health services are being commissioned.

Acute hospitals are under significant pressure to meet demand; however, we are fortunate that Havant residents have the high quality modern Oak Park Community Clinic and access to local community (nursing home) beds.

In order to meet the additional demand on health services that new housing will bring, Clinical Commissioning Groups would wish to apply for s106 or CIL Contributions on individual schemes on behalf of local GP practices, to enable targeted infrastructure improvements for existing local practices to ensure that quality of service is not compromised. Whilst the Department of Health funds population growth on a retrospective per head basis, this forms part of the allocation of funding which the CCG receives annually. Infrastructure to support health services is not budgeted as part of the allocation given to CCGs.

Capital funding for health infrastructure in the NHS is incredibly scarce and difficult to secure, therefore obtaining funding through planning obligations is critical to meet the needs of the healthcare infrastructure which is and will be required to meet demand for services. To achieve this, the Council is requested to amend its CIL Regulation 123 List in order to secure developer contributions through future planning obligations.

Borough population is increasing, but health provision is reducing. As part of the plan it should be possible to investigate the provision of ‘incentivised GP practices’, as pioneered by the Docklands Development Corporation.
The crying need in Emsworth right now is for more GPs, a bigger, better surgery and more NHS dentists.

**Social**

Why is Emsworth Library moving back on your agenda? The central town site is perfect for people using it and if you want to move it to the Community Centre, which as you mention, is a busy place with lots going on, the library with its number of users will not have sufficient room. And that's before you bring a lot more people in.

**Transport (Please also see table for IN2: Improving Transport Infrastructure)**

Cycling should be encouraged - important for health; more attention should be paid to cycle networks
Investing in foot/cycle/public transport is essential but highway improvements are also needed.
Spine Road at Southleigh must come before development
Warblington Crossing is problem
Suggest paved public footpath along Portsdown Ridge
Where are the studies for the congested hotspots today? Current infrastructure must be improved before more homes can be considered
Local roads will not cope with all the extra houses planned around the Emsworth area, bearing in mind that the majority, which will come from the east and the north, will have to go through Emsworth, to access the A27.

One for the Highways Agency, there needs to be another access onto the A27 midway between Emsworth and Chichester, which would ease some of the increasing amount of traffic coming from the east.

Concerned regarding traffic congestion and air quality across the Borough and particularly where there is poor air quality around schools

The Havant Bus Station no longer functions well. The development of the Central Retail Park and the additional traffic lights that were needed together with increasing traffic generated by many new developments is causing long delays. As the plan runs to 2036 we feel that HCC should be looking at the possibility of relocation this very busy bus station in a less congested area.

Two well used cycle routes (Farlington Marsh / Eastern Road route into Portsmouth and NCN2 to Chichester) have problems including: Cycling accidents and narrow cycle track width on Eastern Road, difficult crossings of Rusty Cutter Junction, parking on cycle Lanes in North Emsworth, street parking in Westbourne Centre and a narrow partly on road cycle route along Southleigh Road. Both routes however help to reduce car use and enable many people to maintain better health and fitness.

Cycling access to schools has improved. Several new sections such as on Milton Road are good standard routes but it's still work in progress with a long way to go.

An overview of the present cycleway construction situation is given on pages 125 to 130 of the draft Infrastructure Delivery Plan - comments provides various statistics to improve this section

It's clear that high levels of cycling are possible in Havant. To achieve them radical changes will be needed in attitudes to cycling, standards and amounts of infrastructure provision in both Havant and surrounding districts and the development of a more comprehensive strategic network of cycle routes for commuting across the Portsmouth conurbation, including Havant.

The draft local plan doesn't suggest user capability levels or related construction standards for routes being proposed. If facilities are to be designed user requirements and construction standards are essential starting points. Local Transport Notes and SUSTRANs guides are useful starting points.

Community needs are likely to include:
1. Areas where young children can learn to cycle and get experience cycling. These would be off road in safe and reasonably flat locations. At present Havant Thicket plus some parks and off road routes, meet some but not all needs in the borough.
2. Routes to secondary school safe for all 11 year olds who have passed Bikeability level 2. Only 3 or 4 secondary schools in the borough have partial networks of adequate routes;

3. Routes, from residential areas to utility destinations, where the majority of adults feel safe to cycle. Cycling routes to work, must be, fast, clean, direct and be safe. Few utility journeys in the borough have appropriate infrastructure. Problems include busy junctions, especially roundabouts, road crossings, fast traffic travelling too-close, broken up surfaces, repeated changes of route layout, (including on shared pavements where poor infrastructure can cause friction with walkers), unexpected narrowing of roads and rough, wet and muddy off road routes.

4. Routes on which 12 to 14 year olds with Bikeability 2 could cycle unaccompanied, across town. (Only a few, off road and shared pavement routes are good enough to enable this group to cycle widely.)

The above types of routes would enable most leisure cyclists to cross the Borough.

There are insufficient safe, direct, clean and continuous cycle routes across the borough connecting residential areas with town centres, employment sites, leisure centres and schools. Gaps in provision prevent or reduce many people’s opportunities to cycle.

Highways England would welcome the opportunity to work with HBC to discuss the next steps in the development of the IDP and the Local Plan, to make sure that they are sound and that any identified mitigation (e.g. the new junction on the A27) has a reasonable prospect of delivery within the timescales of when the growth is planned. Once any further transport impacts of the Local Plan sites develop, the IDP should set out any SRN mitigation required to deliver the Local Plan development. For background, you may be interested to read “The Strategic Road Network Planning for the Future” which is a guide to working with Highways England on planning matters. Please see: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227_Highways_England_Planning_Document_FINAL-lo.pdf

Utilities

We are concerned about capacity at Budd’s Farm Waste Water Treatment Centre where there are frequent notified discharges at times of high rainfall.

Some of the additional development proposed in the plan will rely on foul drainage being treated at the Thornham Wastewater Treatment Works. Chichester District Council notes that the Habitat Regulations Assessment assumes that an upgrade to accommodate the additional development is feasible. Whilst in normal circumstances the Council could consider requesting Havant Borough Council to carry out further work, a current evidence base study to support the Chichester Local Plan is underway and will look at the cumulative impact of development on Thornham Wastewater Treatment Works. If necessary, officers will meet with officers from Havant Borough Council to discuss the implications of this study when it is available.

Appendix 4 | Infrastructure Solutions: In the booklet on infrastructure it states Budds Farm Sewage Treatment Works has the capacity to cope with today’s demand, this is not true. Between 29 December 2017 and 6 January 2018 untreated sewage was released into Langstone Harbour from Budds Farm through lack of storage facilities. Stated reason was rainfall but there wasn’t an unusually high amount of rainfall in that period. This shortfall in storage capacity must be rectified before the Draft HBLP 2036 is adopted or large developments are approved

Concerned about capacity at Budd’s Farm Waste Water Treatment Centre where there are frequent notified discharges at times of high rainfall.

The Infrastructure Delivery Plan needs to be updated to reflect the fact that Portsmouth Water do propose to deliver the Havant Thicket Winter Storage Reservoir in the Local Plan period to 2036. Suggested text updates suggested.

Other Matters

Emsworth Neighbourhood Plan Forum would expect that Emsworth would receive its share of CIL monies to be produced from the various developments in Emsworth.

Hayling Island (please also see ‘Hayling Island (General)’ table)

On Hayling there is not enough infrastructure in place to keep building houses (roads, water mains, doctors, provision for young people; pressure on the environment)
Unlimited increased development and therefore added population on Hayling Island is unsustainable into the future. Hampshire Highways have to be compelled to accept that there is a limit to the amount of traffic that the existing road system and bridge can sustain. There should be a moratorium on development projects and the identification of potential sites on Hayling Island, until the Infrastructure study is completed to the satisfaction of Hayling residents and its findings implemented. This should be incorporated within the plan. Hayling’s unique status as an Island and therefore not part of the Havant Borough mainland should be a central theme of the plan.

Funding must be secured to safeguard future of Hayling Ferry

There is no mention of integrated transport at the Hayling Ferry

Increased cycling and Hayling Ferry would reduce traffic on A3023

Infrastructure Plan for Hayling must be agreed (and where appropriate implemented) before decisions on housing development are made (including one road, sewage, water pressure, schools, doctors and dentists, shopping, habitat)

Problems on A3023 don’t only affect Hayling, they also affect Langstone

Can’t see any plans for leisure facilities - suggest HBC should include this in the regeneration project

A significant area of Hayling Island lies at or below sea level, and is forecasted to be at significant risk of flooding as a result of climate change. We find it difficult to reconcile the aggressive blanket-building proposals for an area of high vulnerability where the sustainability of its infrastructure into the future is not certain.

There are four projects concerning the Hayling Island coast which are not understood by us. They can be found in Appendix 4 of the Local Plan (pages 354 and 355.) Three of these are intended to flood areas of the Island coast as new wetlands. We are told that they are in compensation for harbour encroachment by development elsewhere in the Solent area. We are also told that the projects have been approved, but no certification or project plans have been made available or published. The four projects are currently unfunded, with a projected cost of £8.1 million. These proposals seem to have been approved without any Island representation.

Use and transparency of CIL: Will CIL money from Hayling developments be ring fenced for Hayling. How will this information be available in an easy and transparent format for Island residents.

**HBCs proposed way forward for Regulation 19 HBLP2036**

A comprehensive Infrastructure Delivery Plan accompanies the Local Plan. It was published in draft alongside the Regulation 18 draft plan in order to allow representations to be made. The IDP will be reviewed, taking into consideration the comments on individual infrastructure requirements summarised in this table. A final version of the IDP will be published, and will inform the final version of policy IN1.

There is clearly support for inclusion of a policy in the plan governing the effective provision of infrastructure. Proceed with policy as proposed in the regulation 18 draft, with wording amendments to clarify what the expectations of the council are both of its partners, statutory providers and developers.

It should be noted that the spending of CIL funds is not linked to the development that the charge is collected from. How and where CIL funds are spent is a decision for the Borough Council in accordance with the adopted Spending Protocol. See [http://www.havant.gov.uk/sites/default/files/documents/CIL%20Funding%20Protocol%202017.pdf](http://www.havant.gov.uk/sites/default/files/documents/CIL%20Funding%20Protocol%202017.pdf)
## IN2 - Improving Transport Infrastructure

**Summary of key comments raised by residents and other stakeholders**

<table>
<thead>
<tr>
<th><strong>Transport Assessment / Evidence Base</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>HCC as local highway authority raise a holding objection to the Local Plan until such time as the Local Plan Transport Assessment has been finalised and the strategic impacts of the proposed allocations, specifically Southleigh KS5, have been adequately assessed with evidence that any unacceptable impacts can be adequately mitigated.</td>
</tr>
<tr>
<td>HCC supports the methodology of HBC in preparing a borough-wide Transport Assessment (TA) and the use of the strategic model known as the Sub Regional Transport Model (SRTM) to assess the wider transport impacts of the strategic disposition of proposed development across the Borough.</td>
</tr>
<tr>
<td>The Draft Local Plan should be delayed until the results of the Borough Wide Transport Assessment and Analysis of the Transport Network on Hayling Island are available. It is unacceptable to proceed without details on transport proposal. People must be given the opportunity to comment on the results of the study once they are available.</td>
</tr>
<tr>
<td>It is impossible to make meaningful comments on Local Plan without this information.</td>
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<tr>
<td>Question whether the road network can accommodate the additional load</td>
</tr>
<tr>
<td>It is important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. Infrastructure and development policies should be planned at the same time, in the Local Plan.</td>
</tr>
<tr>
<td>The Transport infrastructure is missing from the plan - the single most important improvement that could be made to Havant and Hayling Island</td>
</tr>
<tr>
<td>As the requisite Assessments have yet to be completed, it is not possible to fully identify and quantify the required infrastructure investments. Accordingly, the Council cannot be certain that its proposed allocations are appropriately located and capable of delivering infrastructure solutions. This casts doubt as to the veracity and robustness of the Plan’s delivery and housing strategies.</td>
</tr>
<tr>
<td>Havant Borough Council should assess the cumulative impact of development on the road network, and should the proposals in the Havant Local Plan have a significant adverse impact on the road network (strategic road network and the local road network) in Chichester District, then appropriate mitigation should be identified along with the funding to deliver it.</td>
</tr>
<tr>
<td>Havant Borough Council should establish the emissions that will result from an increase in traffic as result of the proposals in the plan and assesses the cumulative impact (in conjunction with other plans and proposals in the area) of nitrogen deposition on the statutorily protected habitats as part of the Habitat Regulations Assessment.</td>
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<tr>
<td>The draft Local Plan addresses the need to provide road improvements within the development areas but it fails to look at the impact beyond the Borough’s boundary. There appears to be no strategic assessment of the impact of all these developments on the wider area.</td>
</tr>
<tr>
<td>Increased requirement for public transport for students and staff from a wide catchment area for Havant and South Downs college must be included in the emerging transport assessment.</td>
</tr>
<tr>
<td>It is clear that the council accepts that existing residents will suffer from the significantly increased traffic, but the plan does not offer a clear solution on how to alleviate the situation. Perhaps residents would support the plan more positively if there was a clear commitment on how traffic hazards, congestion and air pollution will be avoided.</td>
</tr>
<tr>
<td>In the past, when answers were being sought for the traffic problems to the west of the LTP, the Borough organised a study group - the Broadmarsh Travel to Work Study. Perhaps this approach should be adopted for the LTP Master Planning Team given the affect their work might have on the A3023. The Community as well as business interests should be involved in such a significant development.</td>
</tr>
</tbody>
</table>
### Cycling should be a key component of the integrated transport assessment

#### Transport Strategy - Policy IN2

Highways England is supportive of policies IN1, IN2 and IN3, which align with the principles of NPPF, its soundness requirements, and Circular 02/2013 and will help to mitigate any impacts of Key Sites 1 and 2 on the SRN.

Policy / supporting text should acknowledge cross county boundary impacts

**IN2 b** is supported

Hampshire County Council as Local Highway Authority, needs to consult with Highway England and West Sussex CC to develop a strategic plan as a matter of urgency for the area.

Para 4.22 - the statement on shifting to a 'low carbon economy by encouraging sustainable modes and patterns of travel' is very vague. There should be targets for a modal shift of travel to sustainable and active travel alternatives.

Everyday cycling is an essential part of meeting the Council’s sustainability goals. The Council must set the overall vision for an integrated cycling infrastructure across the whole borough, not just in small development pockets.

There should be a policy to make developers connect up their housing estates with dual use paths to at least 3 other compass points, to encourage more active travel.

Para 4.34 - Compliance with 'Manual for Streets or other recognised guidance and standards’ should be mandatory, otherwise developers will do as they please to maximise their profits.

Development cannot be expected to solve problems which already exist. However, it is reasonable to expect that development mitigates its own impact on the borough’s road network.

As well as the question of additional vehicles there will need to be improved public transport links both North-South and East-West

Planning of cycling and walking infrastructure comes over as being ad-hoc. There is no evidence of a strategic approach as to how walking and cycling might be increased. Havant needs a Local Cycling and Walking Implementation Plan (LCWIP). Not having one would automatically disqualify Havant from many future central funding streams.

In accordance with national policy, Highways England look to HBC to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We would be concerned if any material increase in traffic were to occur on the SRN because of planned growth within the Havant borough, without careful consideration of mitigation measures. It is important that the Local Plan provide the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the A3(M) and the A27.

As neighbouring Highway Authority Portsmouth City Council is keen to work with Havant Borough Council as Local Planning Authority and Hampshire County Council as Highway Authority on any future proposals for Bus Rapid Transit across south east Hampshire and to ensure they are appropriately reflected in emerging Local Plans.

The local plan needs a positive statement in the text about developing public transport through Bus Rapid Transit (BRT). HCC supports the delivery of a BRT network in SE Hampshire with routes to Havant, Waterlooville, QA hospital, Portsmouth and Fareham and the opportunity to serve the proposed strategic housing site at Southleigh (KS5). To support BRT provision in the borough there needs to be a specific policy to replace previous policy AL5 (Cross borough rapid transit) rather than a general reference to bus travel within the Improving Transport Infrastructure policy (IN2).
There are inconsistencies in the way transport matters are addressed. There needs be some generic policy wording which can be applied to all the site allocations to ensure that they:

- have a transport statement/assessment;
- promote sustainable travel by all modes and are accessible by pedestrians and cyclists;
- mitigate the impacts of additional traffic on the highway network, environment, air quality and amenity;
- secure on site and off-site highway improvements or financial contributions.

### A27 Junction

The new A27 Junction that is planned for Southleigh will take some of the commuter traffic created by Southleigh new housing. It is not likely to make any effect on the demands of traffic to Havant or the North.

There can be no development prior to the new junction being funded and agreed.

Unforeseen consequences should be considered carefully. For example, the proposed new spine road/A27 junction may well alleviate (for a period) traffic flows in the centre of Havant, but we should not overlook the potential detrimental effects. These could include:

- A marked increase in through traffic from the A3 via Rowlands Castle to the A259 and the new junction via the B2148 which already has a poor accident record (HBC website);
- An additional strain on country roads north of the A27 when A27 is closed (and the effect of traffic trying to negotiate Chichester from north to south to regain the A27);
- The difficulties for local residents to access the spine road once it becomes a major thoroughfare;
- The use of ‘rat runs’ through the neighbourhood streets.

Highways England would like to work with the council to assess the deliverability of the Southleigh site and the proposed new access onto A27.

HBC still needs to demonstrate that the junction:

- Is needed
- Can be designed in conformity with the Design Manual for Roads and Bridges
- Is deliverable, i.e. can be funded by the Southleigh development, or other funding mechanisms
- Would not negatively affect flows along the A27 and A3(M)

It should either be acknowledged in the plan that the plan will not be deliverable without this junction, or alternative mitigation for the transport impacts of development should be identified.

New slip road would only increase more traffic on an already congested road.

The possible new A27 junction and relative roads may help but even that is probably going to exit in the town in an area of narrow, cluttered roads.

### Specific Areas

**NB for Hayling Island please see the ‘Hayling Island (General)’ table**

Concern raised over capacity of the following roads and areas, in light of development proposals:

- Concern over cumulative impact of development along the A259 corridor in Havant and West Sussex
- Access to A27 from Emsworth town centre. This is very narrow and already congested
- Southleigh Road / Warblington level crossing
- Park Road North. This is very congested at the best of times due to the four sets of traffic lights
- Emsworth - North Street - Railway Bridge - Horndean Road
- Horndean Road corridor (B2148/B2149) from Emsworth to Rowlands Castle (and link to Horndean and A3(M); in particular junctions with Southleigh Road, Bartons Road, New Brighton Road, Emsworth Common Road
- A3023 particularly at the Langstone Roundabout on the A27 and the turn into the Langstone Technology Park

Plan must consider how people travel to and from Emsworth Town Centre

Parking in Emsworth, Havant and Waterlooville is not easy and car use is being discouraged. Local parades of shops do not fill all requirements.

Leigh Park is well served by buses and it is easy to get to Emsworth and Waterlooville from the town centre.
The Denvilles/Southleigh/Horndean Road area is lacking public transport and a car is essential if you are older or have mobility problems.

It is requested that HBC works with EHDC and HCC Highways to ensure that suitable improvements are made to the B2148 and B2149 route between Emsworth and Horndean using some of the developers’ contributions to ensure the safety of road users and pedestrians alike.

Westbourne is increasingly being used by traffic flowing from Emsworth and the eastern areas of Havant on route to Chichester or Rowlands Castle, the A3M and beyond. The level of traffic generated by the Southleigh proposal will add to this growing volume of traffic passing through the village. Westbourne Parish Council would argue strongly that the findings of the TIA may require mitigation measures to be funded by the strategic development at Southleigh in order to deter and control traffic passing through Westbourne Village.

The road junction into Emsworth station is dangerous and should be reviewed

The use of Emsworth station has dropped from 500,000 to 250,000 journeys per year; this is due to Southern Rail disputes and the Council switching off the lights going north (residents feel unsafe)

**General comments on transport matters**

- Transport is a serious problem in the borough.
- Delays damage businesses and therefore the local and national economy.
- Cycle routes that are also pedestrian routes are dangerous. They should be separated.
- The present roads are in a dreadful condition, residential, and trunk roads - like a third world country now.
- With this increased traffic, pollution is another serious problem.
- The 21st century population is reliant on its cars, vans and lorries for transport. Therefore the road network is, alas, crucial to a thriving and growing economy.

**HBCs proposed way forward for Regulation 19 HBLP2036**

The majority of the comments on this policy relate to concerns about highways and transport in the borough, and the impact that additional development will have, as well as the fact that the transport evidence has not been completed.

As was noted in the draft HBLP 2036 in the introduction to Policy IN2, the evidence base to inform the transport package to accompany the Local Plan has not been completed.

The Council will continue to work with Hampshire County Council and Highways England to complete the evidence base. The results of the Borough Wide Transport Assessment (TA) and the Hayling Island Highway and Transport Infrastructure Assessment will be reflected in next draft of the Local Plan. At this stage the ‘Improving Transport Infrastructure’ policy and the infrastructure Delivery Plan will set out the key schemes identified both through Hampshire County Council Strategic Planning and those identified in the full plan TA as being necessary to mitigate and support the development proposals in the Local Plan.
Support

Support for IN3 - The draft Policy adopts a flexible approach towards transport and parking to respond to the characteristics of the development proposed. The draft policy is consistent with national policy, in particular paragraphs 32 and 35 of the NPPF which seek to ensure significant transport impacts are mitigated and sustainable transport is implemented where possible.

Highways England is supportive of policies IN1, IN2 and IN3, which align with the principles of NPPF, its soundness requirements, and Circular 02/2013 and will help to mitigate any impacts of Key Sites 1 and 2 on the SRN.

Evidence Base

Micro simulation should be put out for public scrutiny

Paragraph 4.43 - support the development of a Paramics (or other simulation) model for other key pinch points of road infrastructure in the Borough where traditional traffic analyses are unlikely to capture the full spectrum of effects of new development. Traditional traffic flow modelling does not sufficiently represent the range of congestion effects that occur whereas simulation will be able to better capture the reality of current (and future) delays and congestion.

Parking and other standards

Council should aim for higher standards in parking than national standards

Policy IN3 (c) and 4.35 - Draft refers to "Provision for parking in line with Council Standards". What is the government guidance on which the Parking Supplementary Planning Document 2016 is based and is it the latest guidance? HDLP 2036 IN3 must mandate parking provision (as a minimum) in compliance with the latest DoT guidance at the date of adoption of the Plan.

What parking & safety measures have been put in place for additional cars & cycles?

Encourage sufficient parking to be allowed for in the new estates.

For those that have more space, two parking spaces ‘side-by-side’ is very attractive compared to two ‘back-to-back’

People often use their garage for storage instead of parking. They are valued storage spaces.

Do not support provision of car ports instead of garages.

When requiring travel plans and access plans and related documents from developers, there should be a loose standard adopted to direct the types of consideration required. For example, the use of census data is helpful within each ward to consider how much parking may be required against how much change to bus routes requires consideration. Having established the need for adapted housing, this needs to drive the number of enforceable accessible parking spaces.

New estates often forbid parking of trade vehicles, pushing them into adjacent roads. This makes the new estate sound attractive but places an unfair burden on existing communities and must be explicitly prevented. It is suggested that all new developments should be required to provide a minimum level of parking for trade or commercial vehicles within the site. It is proposed that the Parking SPD, as part of the Local Plan 2036, is amended and Policies IN3 and IN4 which cover parking and Management Plans urgently need to reflect the requirement to provide such parking. Element c) of the policy needs to set a clear expectation that new development must not lead to parking for the development over-spilling into adjacent, existing roads.

Allowing houses to be built without adequate parking around the station has meant that local residents use up all the car parking at the station rather than passengers.
Para 4.34 reference to Manual for Streets or other recognises guidance and standards: Change “or” to “and”. Reason developers should not be encouraged to ignore national or local guidance or standards.

‘Shared space’ should be eliminated to safely separate pedestrians from motor vehicles.

Where a higher proportion of elderly or disabled people may live, there should be wider pavements allowing safe shared use.

There must be proper planning for dropped kerbs, correct gradients, maximum levels of crossfall

**Encouraging alternative modes**

E-bikes should be specifically mentioned, and a positive statement made that all references to cycling automatically include and encourage e-bikes.

Cycle parking facilities and security get very little mention, but they are essential to encouraging modal shift in transport, and are very easy and cheap to provide, if required and planned at the outset. They should apply to all types of development - residential, shopping, leisure facilities and commercial / commuting environments. Secure cycle parking is essential, especially for employees. This should be made mandatory for other employers.

Criterion K: Electric Vehicle charging infrastructure is not justified. Strongly object to this requirement, as no suitable evidence or justification has been produced to support it (need; cost /viability implications)

Support IN3 h (as far as it goes)

Support 4.36, but will require significant improvements in design standards and focusing to meet user needs if cycling is to increase

HCC supports the requirement that all new development should reduce the need to travel through promoting sustainable transport modes and by making the layout of the site accessible by walking, cycling and public transport with connections to existing networks.

This policy needs more supporting text in How the policy Works section especially on sustainable transport modes.

**Mitigating Impacts**

Paragraph 4.43 - How can the simulation possibly give accurate answers for each developer if the model is unaware of all developer intentions? The likely outcome is that early development will be favoured and late developers will struggle that’s assuming that the model is updated for each development which I doubt.

IN3(a) sets the bar too low to ensure that the negative impacts of new developments on the road infrastructure are prevented. Requiring developers to only show that they can mitigate impacts to below a ‘severe’ level is unacceptable. At the very least the criteria should be ‘moderate’ rather than ‘severe’ impacts. There is also a need to formally define these criteria lest the Council wants to end up arbitrating on the definition of terms.

What constitutes a ‘mitigation measure’ should be constrained to specific physical changes to the road infrastructure (junctions, traffic lights, etc.). This will help limit artificial claims about the percentage of car owners, journeys and propensity to travel by sustainable modes of transport that developers seem to claim in planning submissions for new developments.

We consider that, as currently worded, the policies in the plan should be capable of providing transport infrastructure improvements in West Sussex to mitigate the transport impacts from proposed development in Havant. (specifically IN3)

Should change ‘severe’ to ‘significant’ impacts on the network in paras 4.40 and 4.42

We welcome point i. of this policy regarding rights of way, but request amendments to text to support enhancements to the network, where appropriate. In addition, HCC request that major developments submit a ‘PROW Assessment’, demonstrating how the development will seek to protect and enhance the local rights of way network, including providing new routes, where appropriate.

HBCs proposed way forward for Regulation 19 HBLP2036
Proceed with policy as proposed in the regulation 18 draft, and consider wording amendments to:

- Consider how the council can limit restrictions on parking (eg of trade vehicles) on new estates imposed by developers in order to prevent effects on nearby roads
- Strengthen the encouragement of and provision for sustainable modes of transport
- Set out more clearly the evidence base to support requirements for electric vehicle charging infrastructure
- Require full mitigation of all expected highway impacts, without unproven reliance on modal shift (while still requiring sustainable transport measures and travel plans to better the situation)
- Require Public Rights of Way assessments for major developments

Comments where no change is considered necessary:

- National planning policy does not require any particular parking standards. These may be set locally. However, this is too detailed a matter for the Local Plan. Therefore, this policy requires compliance with the standards, which are set in Supplementary Planning Documents (currently the SPD adopted in 2016). The Council is currently considering a review of its Parking Standards SPD. If such a review takes place, there will be opportunity for to comment on the standards proposed.
- National Planning guidance is clear that Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concern regarding the shift in responsibility to private management companies for maintenance of common parts.</td>
</tr>
<tr>
<td>Out-sourcing has proved to be a false economy and difficult/ expensive to remedy if it fails</td>
</tr>
<tr>
<td>Concern that policy E22 refers to ‘whole life management and maintenance’ with regard to ground water pollution or overflow into controlled water which is lacking in policy IN4</td>
</tr>
<tr>
<td>Effective management cannot be provided on a site by site basis:</td>
</tr>
<tr>
<td>- There should be a clear masterplan for blue and green infrastructure (including management) against which the council can assess future development plans</td>
</tr>
<tr>
<td>- The sensitive ecology of Havant water courses as they impact on the sustainability of Chichester Harbour cannot be presumed adequately managed if dealt with on a site by site basis by differing commercial management companies</td>
</tr>
<tr>
<td>- The ‘common parts’ include systems where there is a need to ensure that cumulative impact is assessed</td>
</tr>
<tr>
<td>The management of sustainable drainage systems is a concern</td>
</tr>
<tr>
<td>Questions raised with regard to:</td>
</tr>
<tr>
<td>- The expertise of developers to deliver effective management</td>
</tr>
<tr>
<td>- Is money held back until the Sustainable Urban drainage scheme has proved itself over at least one annual cycle</td>
</tr>
<tr>
<td>- How will private management companies work in practice as their performance is dependent on regular monitoring. Will this impact on saleability of houses</td>
</tr>
<tr>
<td>- Will questions over drainage and maintenance affect household insurance</td>
</tr>
<tr>
<td>- How is regular maintenance of common parts guaranteed</td>
</tr>
<tr>
<td>There should be some caveat in the policy to restrict excessive price rises by management companies.</td>
</tr>
<tr>
<td>A local residents panel should be set up to assist in monitoring implementation so that ongoing management is based on implementation of details approved through the application process</td>
</tr>
<tr>
<td>All the sites in Emsworth have flooding issues and the future management of the sites/management plans are lacking in practical detail.</td>
</tr>
<tr>
<td>Covenants placed on new developments (e.g. Manor Farm/Nursery Fields, Denvilles) which state that parking of commercial/camper vans overnight on the estate is prohibited has led to upset as such vehicles have to find alternative parking down adjoining roads. The Council should insist on developers providing separate adequate provision for commercial/camper van parking on all new estates.</td>
</tr>
<tr>
<td>HBCs proposed way forward for Regulation 19 HBLP2036</td>
</tr>
<tr>
<td>Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to include:</td>
</tr>
<tr>
<td>- Amending the wording to reference whole life management and maintenance</td>
</tr>
<tr>
<td>- Whether a new policy to provide master planning for blue and green infrastructure is required</td>
</tr>
<tr>
<td>- If Sustainable Drainage bonds should be retained until one annual cycle has been completed rather than until completion of the works</td>
</tr>
<tr>
<td>- A requirement for on site parking for commercial vans/camper vans or a restriction on covenants that remove the ability for parking of these vehicles within the curtilage of proposed properties</td>
</tr>
<tr>
<td>Comments where no change is considered necessary:</td>
</tr>
</tbody>
</table>
Concerns with regard to the current process for management of common parts is noted. This policy seeks to provide greater surety with regard to the management of the common parts of future development.

The maintenance of common parts in new development is now the responsibility of private management companies. This is a result of Councils seeking to provide services in a cost-effective manner.

The elements and maintenance requirements that are the responsibility of private management companies are secured by legal arrangement where necessary. However, the continued maintenance and performance would also be subject to a separate legal agreement that prospective owners would agree to prior to purchase of the property.

During the assessment process for Sustainable Drainage Systems, regard is given to contamination into watercourses. There should be no cumulative impact arising from the management of common parts unless agreed by bodies such as the Environment Agency.

Due to fluctuating operating costs (labour, materials, equipment etc) it is not appropriate to cap price rises that a private management company may impose. However, the policy allows for change in managing agent should the majority of residents feel this is appropriate.

The Council monitors whether and how applicants discharge planning conditions and requirements in legal agreements. This is public information and so any one can access it. However to create a residents panel is not seen as necessary as it would simply replicate this function of the Council.

The management of flood risk in new development is considered within Policy E12. Drainage infrastructure in new developments is considered in Policy E13.
The Environment
### Summary of comments raised by residents and other stakeholders

#### General

**Policy E1 is welcomed.**

There is no mention of leisure facilities which can be important for quality of life and mental wellbeing, particularly for adolescents.

The previous Health Policy (CS1) included ‘educational and life chances’ for young people which HCC suggest should be mentioned in policy E1.

**Point b. mentions ‘good urban design’ and ‘easy access’ - the six elements of the TCPA Healthy Weights Environment resource may be useful guidance for this.**

Hollybank Recreation Ground should be included as a strategic open space as it is a popular and well-used community asset and destination facility.

**Paragraph 5.8 is confusing. Rewording suggested.**

It is not completely correct that ‘The local Havant Health Profile 2017 shows that these areas of health are worse than the England average’. Rewording suggested.

**Paragraph 5.12 should require developments to be designed to be permeable. Rewording suggested.**

Proposed policy is in line with the principles contained within Sport England’s ‘Active Design’ guidance - a cross reference would be useful.

Development in Havant borough should be designed in line with the Active Design principles to secure sustainable design.

**Hayling Island Beachlands area is not one of the most deprived areas in Hampshire. This is an outrageous false claim and a statement that the council is using to propose its regeneration.**

#### Access to the coast

**Point (d) should include an exception saying that access to the coast should not be specifically encouraged where this would increase disturbance to internationally designated Chichester and Langstone Harbours SPA.**

Point 12 of policy CS1 which relates to moorings, berths, jetties and slipways in the Harbours or on Hayling waterfront, has been removed. This makes an important point about the moratorium on moorings and berths and the restriction on new jetties or slipways unless they are essential for public use, as reflected in the Conservancy’s Planning Principles PP1 ‘Intertidal Structures’ and PP12 ‘Limits on Marinas and Moorings’ - it should be reinstated.

#### Sustainable Transport

**Cycle racks/storage facilities need to be provided in all public spaces, to further encourage active travel.**

Direct link between heavily congested roads, lack of cycle infrastructure and poor public health due to sedentary lifestyles and environmental pollution. Increased traffic from new housing will further discourage cyclists and result in a decrease in cycling and a failure to encourage more active travel.

**Sustainable transport needs to go wherever people go, point (d) should be amended to reflect this.**

Point (g) should include ‘provide opportunities to learn to cycle in a safe environment’.

#### Open Space
The threshold for requiring open space on new developments should be lower than 50.

Paragraph 5.12 supported.

The quality of open space and environmental quality that encourages and enhances well being includes the historic environment, being both quality and sense of place, sense of community and a destination motivation for recreation walks.

HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- Leisure facilities should be referenced
- Educational and life chances for young people should be referenced
- A requirement for new developments to be ‘permeable’ should be included
- The list of strategic open spaces under point (f) is fit for purpose
- There should be a requirement for development to be designed in line with Sport England’s Active Design guidance
- Point (d) should include an exception saying that access to the coast should not be specifically encouraged where this would increase disturbance to internationally designated Chichester and Langstone Harbours
- Point 12 of policy CS1 which relates to moorings, berths, jetties and slipways in the Harbours or on Hayling waterfront should be reinstated

Comments where no change is considered necessary:

Cycle racks/storage facilities are dealt with in the Parking SPD

The threshold of 50 dwellings for requiring on site open space is dealt with by Policy

Paragraph 5.7 does not say that Hayling Island Beachlands is one of the most deprived areas in Hampshire. It says Havant is one of the most deprived areas in Hampshire and that Beachlands is an area of focus for the Council.
### Summary of key comments raised by residents and other stakeholders

#### General

- **Support for policy, particularly points (b) i. and ii.**
- **Principle of multi-functional green infrastructure and the idea of green infrastructure as a network is supported.**
- **The role of heritage and the historic environment in green infrastructure should be referenced in the policy and paragraph 5.20.**
- **With the increase in development pressure within the Borough, it is very important for the Proposals Map to identify potential areas or zones where GI will play a significant role in preventing the coalescence of settlements, retaining local landscape character, addressing the setting of the AONB, maintaining ecological corridors and networks as well as preventing the fragmentation of habitats and species. Any development within these zones would need to ensure the above measures have been addressed.**
- **The Local Plan is too balanced towards human recreational needs at the expense of biodiversity survival needs.**
- **The current wording of Policies E2, E3, and E4 are unsound as it not effective in being sufficiently flexible to respond to the needs of public service providers and local stakeholder’s plans.**
- **Supporting text should acknowledge the role of Section 77 of the School Standards and Framework Act 1998 regarding the development of surplus school playing fields to rationalise land holdings as a means of financing recreational and educational improvements.**
- **There should also be a policy to state that native species of trees and shrubs should be used in landscaping of new green infrastructure and planting carried out to screen development.**
- **Inconsistency between Policy E2 and the supporting text, in relation to green infrastructure and open space. The terms have been used interchangeably. Policy E2 and its supporting text need to clearly differentiate between the more environmentally-focused green infrastructure networks and the more community-focused open space, in order to be consistent with national policy. Such an approach will provide clarity in the interpretation of the policy with respect to the determination of a planning application.**
- **Green spaces are required to form a network if the quality of the environment is to be protected and enhanced.**
- **Definition of green and blue environment is needed.**
- **Blue and Green Infrastructure Masterplans are required.**
- **Policy in conflict with H1 as the magnitude of allocated sites will do nothing towards aim of protecting green infrastructure.**

#### Ecology

- **Recommended that the role of GI to maintain and enhance the biodiversity of the Borough is fully explored and opportunities identified to maximise the benefits of the GI for both people and wildlife.**
- **Policy E2 should be strengthened to ensure biodiversity enhancement is secured and measures to enhance wildlife areas and strengthen ecological corridors are incorporated.**
- **The Council should use ecological network mapping in order to establish where such networks may function best for wildlife.**
- **Sanctuary areas for wildlife should be maintained, such as high tide wader roosts, woodlands and open grassland in order for sensitive species and fragile habitats to co-exist with people.**
Recreational disturbance is one of the primary causes of disturbance for wildlife. With an increasing population, people will seek out more tranquil places for recreations, thereby disturbing the more sensitive species and habitats.

**Open Space Requirement**

Requirement for more green spaces to be provided is supported.

Flexibility should be added into the delivery of new green infrastructure on developments of 50 dwellings or more. The policy should allow for the payment for offsite contributions which could be used to provide an improvement to an existing facility or wider project. The policy as drafted will result in a proliferation of smaller play areas with limited play value.

The council should consider the open space requirement at a lower threshold than 50+ households.

Para 5.26 doesn’t make sense - all developments on Hayling have been on greenfield sites and there is no compensating provision for residents.

**Management of Open Spaces**

Policy does not include proactive improvement measures in the management of green infrastructure.

The policy should emphasise how neglected green areas could be sensitively enhanced to cater for wildlife and recreation.

The policy should also contain provision for management of open spaces, hedgerows etc so that they continue to function ecologically and remain attractive.

**Sustainable Transport**

Welcome reference to wildlife corridors but cycling corridors not mentioned.

Support for the development of the GI network for the Borough to help ensure there are improved links to less sensitive open space areas by public transport, walking and cycling and look to directing recreational pressure away from more sensitive areas.

The Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 75 of the NPPF.

**Recreation**

The significant increase in population will clearly result in an increased demand to make use of activities such as sailing, cycling and horse riding. There is no indication on how specifically the demands will be managed.

Regeneration is included in the plan. Some of this should include the swings/slides etc. in Hayling Park as it’s looking very sad and neglected.

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- Heritage and the historic environment could be referenced
- A requirement should be included for native species of trees and shrubs to be used in landscaping of new green infrastructure and planting carried out to screen development
- The use of the terms ‘green infrastructure’ and ‘open space’ need clarification
- Definitions of blue and green environment should be included
- Whether a new policy to provide master planning for blue and green infrastructure is required
- The role of green infrastructure to maintain and enhance the biodiversity of the Borough is fully explored
- The policy could be strengthened to strengthen the requirement for biodiversity enhancement
- The open space requirement is appropriate
• The policy should make reference to maintenance and enhancement of open spaces
• A criterion to protect and enhance public rights of way and National Trails should be added.

Comments where no change considered necessary:

• The impact on landscape and the AONB is covered by policies E10 and E11 whilst the Biodiversity Strategy (update of BAP) will look at ecological corridors and networks. The proposals map illustrates geographically the application of policies in a development plan but it wouldn't be appropriate to go into the level of detail suggested regarding green infrastructure.
• It is recognised that it is important to protect green infrastructure, however, this does not outweigh the housing need. Policy E2 seeks to ensure the protection of existing green infrastructure in combination with housing delivery.
• Ecological mapping will be explored in the Biodiversity Strategy
• Sanctuary areas for wildlife are considered in policy E15
• Strategies to mitigate recreational disturbance are set out in Policy E16
• Paragraph 5.26 talks about the standards for new open space provision on development sites which will help address the loss of greenfield sites
• Criterion (b)ii. seeks to improve linkages in the green infrastructure network wherever possible by improving accessibility by walking and cycling and providing wildlife corridors
• Increased demands on sailing/ cycling/ horse riding are not relevant to this policy
• Developer contributions may be used to improve open spaces including play parks
• The approach to planning obligations will be considered through the Draft Charging Schedule and the Regulation123 list
• It is not considered that local public service providers should be exempt from the requirements of Policies E2, E3 or E4
## E3 - Sports and Recreation

5 responses were received regarding this topic

<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Support for policy.</td>
</tr>
<tr>
<td>Watersports should be supported in Hayling Island to make it a destination for healthy lifestyles and sport.</td>
</tr>
<tr>
<td>Cycling and walking should be explicitly listed as sports and recreations.</td>
</tr>
<tr>
<td>5.44 references ‘Open Space Sports and Recreation Study’ but it is unavailable.</td>
</tr>
<tr>
<td>Clarification needed on criterion (c) to ensure it fully complies with Para 74 of NPPF.</td>
</tr>
<tr>
<td>Work ongoing on Playing Pitch Strategy (PPS) supported - once complete it should inform development of the Local Plan. PPS should be referenced in policy or footnote.</td>
</tr>
<tr>
<td>Recognition of the importance of educational sites in contributing to sports facilities and the associated issues in terms of community access is supported</td>
</tr>
<tr>
<td>The Local Plan to acknowledge that commercial sports (not retail) are a legitimate use on Industrial and Business parks creating employment as well as inputting into the local economy.</td>
</tr>
<tr>
<td>The current wording is unsound as it not effective in being sufficiently flexible to respond to the needs of public service providers and local stakeholders plans.</td>
</tr>
<tr>
<td>Supporting text should acknowledge the role of Section 77 of the School Standards and Framework Act 1998 regarding the development of surplus school playing fields to rationalise land holdings as a means of financing recreational and educational improvements.</td>
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<tr>
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<tbody>
<tr>
<td>Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:</td>
</tr>
<tr>
<td>• Watersports on Hayling Island should be specifically referenced</td>
</tr>
<tr>
<td>• Amendments to criterion (c) (loss of sports and recreation facilities) are necessary</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comments where no change is considered necessary:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Policy E1 seeks to maximise opportunities for walking and cycling</td>
</tr>
<tr>
<td>• The Open Space, Sport and Recreation Study is currently underway and will be available for the Regulation 19 consultation.</td>
</tr>
<tr>
<td>• The location of commercial sports facilities on industrial and business parks will be considered in the employment policies (see tables on policies C1 and C2).</td>
</tr>
<tr>
<td>• It is not considered that local public service providers should be exempt from the requirements of Policies E2, E3 or E4.</td>
</tr>
</tbody>
</table>
### Summary of key comments raised by residents and other stakeholders

Please also see table on ‘Is there another site which should be noted as a Local Green Space designation’.

#### Support the policy.

There are worryingly few green spaces protected by the policy.

The current wording of Policies E2, E3 and E4 are unsound as in not effective in being sufficiently flexible to respond to the needs of public service providers and local stakeholders’ plans. Supporting text addition suggested.

These [Local Green Spaces] do not get enough attention with many areas omitted. More attention should be paid to the protection and regeneration of woodland, meadows and hedgerows. With the increased population envisaged current facilities will be overused, there will be more pollution from increased traffic.

The Council should observe the criteria shown.

We request the following spaces to be added to the list which we intend to include in the Emsworth Neighbourhood Plan: The Emsworth Victoria Cottage Hospital Garden; 3 allotment sites in Emsworth at Warblington Road, Washington Road and Redlands Grange; “Horse Fields” (opposite Brookfield Hotel); 2 Recreation Grounds (Horndean Road & Soughleigh Road); Ems Valley Corridor (East Hampshire Strip/Sussex Border Path field east of Westbourne Avenue).

East Hampshire Strip/Sussex Border Path field east of Westbourne Avenue meets the criteria for a designated green space and we have received numerous representations requesting that it is designated as such. We would therefore like to include this site as a designated green space in the Emsworth Neighbourhood Plan and request that HBC does the same in its Local Plan.

#### Comments in relation to Westwood Close (Policy H10):

- Multiple requests for policy H10, land at Westwood Close be removed from the Draft Local Plan be added to Policy E4 as a new Local Green Space
- Increasingly important given the scope of development in nearby areas.
- It fully meets the criteria required to be classified as a Local Green Space (E4).
- Should be formally designated as Sussex Border Path Green Space - this would strengthen the vulnerable nature of the gap between Havant and West Sussex
- If the Council determine the application, they will in effect rule out the residents’ request to include it in the list of Local Green Spaces - this request was presented in good time through the consultation process of the Draft Local Plan. The application for planning consent ought not to take precedence over the consultation period and subsequent consideration of all requests.
- The Green Corridor should be recognised as a LGS as it fulfils the details of beauty, historic significance, recreation, wildlife and is a recognised right of way through this tract of land.
- One of the few green spaces left between Westbourne and Emsworth and an important green corridor / safe country walk between the two villages.
- The area selected to build new homes is inappropriate and would result in an unnecessary destruction of wildlife habitat. It is a vital habitat for a wide range of birds, small mammals, insects, stream life and plants, and mature trees and hedgerows which provide wildlife with homes.

The green sites to the east and the strip through the centre of the Southleigh Masterplan should be retained - we have been reassured that if they are well used for recreation they will be safe from further development. Even if it is not fully used by people - it provides one of the last remaining wildlife corridors connecting the South Downs to the Harbour AONB/SSSI/SINC.

It is understood that the areas listed in the Draft Local Plan may be extended, but the draft policy written around them appears to be woolly and exposed to potential challenges by developers offering facilities in exchange for more houses.
Existing neglected assets, requiring enhancement to provide improved accessibility, recreation opportunities and effective wildlife corridors.

Addition to the Local Green Spaces designations would boost local appreciation of them as assets in close proximity to the community, and places of beauty, wildlife and tranquillity especially if managed appropriately by residents’ Friends of Group. Havant Borough Tree Wardens, in partnership with TCV (The Conservation Volunteers), the Tree Council and Borough arboriculturalists, would be happy to support this sort of community activity:

Gundymoor Wood, St Clares Wood, Stakes Coppice, Hurst Wood, Purbrook Woods and Covert Grove should be designated Local Green Space (LGS) to raise their status in the borough, encourage local custodianship and the formation of Friends of Groups to manage and care for these woodland fragments.

Sites required to preserve existing recreational and amenity demand, or to ensure either future provision for increased population or to reduce impact on coastal routes or to ensure recreation where people live:

Old Victoria Cottage Hospital Garden, Emworth; Southleigh Recreation Ground; Eastern edge from north to south of Southleigh Strategic site; Sussex Border Path/East Hampshire Gap, grazing land east of Westbourne Avenue/Westwood Close; Allotments at Warblington Road, Emsworth; Allotments at Washington Road, Emsworth; Allotments at Redlands Grange; Fields south of Havant Road (opposite Brooklands Hotel) known as Horse Field H22A); Fields along the Solent Way between Emsworth and Warblington (H23F and H23E); Land around Warblington Church and Farm (H23 C & D).

Those sites which are designated currently (as LGS) should remain so

HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments.

Whilst the identification of sites as a local green space would be likely to give them a greater profile and raise the community’s awareness of them, paragraph 77 of the NPPF is clear that the designation should only be used “where the green area is demonstrably special to a local community and holds a particular local significance.” The Council will consider the suggested sites and whether they should be designated as Local Green Spaces as defined by Policy E4 of the Regulation 19 HBLP 2036.

Comments where no changes are considered necessary:

Many respondents raised concern that green spaces were not protected by the policy - however, green and other open spaces would already be protected by Policy E2 (Green Infrastructure), which makes clear that development proposals that would result in a loss of open space as defined on the Proposals Map, will normally be refused. It identifies the exceptional circumstances in the loss of open space may be permitted. A number of respondents have raised concern in relation to the loss of the open space from the new development at Southleigh (see table KS5 - Southleigh).

It is not considered that local public service providers should be exempt from the requirements of Policies E2, E3 or E4.

The NPPF also allows local authorities to designate green space for special protection as Local Green Space. It would afford additional protection by ruling out new development other than in very special circumstances (emphasis added). However, paragraphs 76 and 77 of the NPPF are also clear this designation should not be applied to most green areas or open space - hence the identified list of sites set out in the policy.

The forthcoming Havant Biodiversity Strategy will consider the importance of wider ecological corridors for woodland and wetland habitats informed by the ecological network mapping work undertaken by the Local Nature Partnership.
Various sites are proposed for inclusion in the Emsworth Neighbourhood Plan. Whilst the suggested sites will be considered further through the HBLP 2036, national guidance enables local communities to designate Local Green Spaces through neighbourhood plans so long as they are in broad conformity with the local plan.

Several respondents have also requested the removal of land at Westwood Close (H10) as a housing allocation, and its designation as a Local Green Space in line with E4. Notwithstanding the high housing need in the borough, the principle of development on this site is being further considered (please see the response table for Policy H10).
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Support for this policy.</td>
</tr>
<tr>
<td>Point (d) which proposes additional links to the local rights of way network is supported.</td>
</tr>
<tr>
<td>Concern that the construction of the Havant Thicket Reservoir pipeline will impact on the Hermitage Stream cycle path.</td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with potential wording amendments. Consider whether the policy should refer to the pipeline route and associated works.
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Support for the policy.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy E6 (or other Policy if more suitable) must require developers to demonstrate the compliance of their designs with latest central or local government guidance on building safety in force when HBLP 2036 is adopted.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Although some flexibility built into each criterion, it is suggested the policy includes a clearer statement requiring consideration of how the criteria should be applied to each application on a case-by-case basis.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Green areas are welcome. However, there should be consideration of design to discourage anti-social behaviour in these spaces.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Criterion C vi draws reference to loss of outlook. Outlook is not a material condition and it would be unlawful for the Council to suggest that this were a material consideration in the determination of applications.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cycle parking should be required to be covered within para d. (x).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Potential adverse impacts on the South Downs Nation Park should be referenced and considered further. Whilst Havant borough does not directly adjoin the SDNP, there can be knock-on impacts further afield from development within the borough. All local authorities bear a statutory duty to “have regard” to the purposes of National Parks when making decisions that will affect their setting.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Emsworth Design Statement (2008), which was approved by HBC, should be taken into account, particularly section 3.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>It is also important to follow through with a properly integrated road and pavement design, eliminating ‘shared space’ to safely separate pedestrians from motor vehicles, and where a higher proportion of elderly or disabled people may live, there should wider pavements, allowing shared use for cyclists, motorised scooter and pedestrian usage, clearly signposting speed limits for mobility scooter users (4mph) along with advisory limits for cyclists. There must be proper planning for dropped kerbs, correct gradients, maximum levels of crossfall (eg gradient for slope from house boundary to roadway).</th>
</tr>
</thead>
<tbody>
<tr>
<td>A mix of housing design (external) should be encouraged in developments.</td>
</tr>
</tbody>
</table>

| We would advise that all development, not just the non-householder development, should integrate with existing local landscape features and characteristics of the area protecting and enhancing local wildlife, biodiversity and ecology |

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- To require long term cycle stores to be covered
- There is a need for greater flexibility for case-by-case considerations
- Reference to consideration of the impact on the setting of the SDNP should be made
- A greater requirement for integrated road and footway design is necessary as part of point c. (v).
- The point at d. (iii) regarding crime and anti-social behaviour should be replicated in the residential part of the policy
- The point at d. (v) regarding landscape features and ecology should be replicated in the residential section of the policy
- The policy should require a suitable mix of design types in new development

Comments where no changes are considered necessary:
• Building safety (construction) is generally considered within the Building Regulations and not through the planning system.
• The policy already requires local design statements to be considered at paragraph E6(b)
• Loss of outlook/overshadowing is a material planning consideration where it is to the detriment of residential amenity (though not loss of view as such)
## Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Support for policy relating to adaptable dwellings.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential garden size should be given greater consideration. Particularly social units which tend to primarily house families with children.</td>
</tr>
<tr>
<td>No evidence has been presented to demonstrate that space standards are a necessity in Havant. This is required by the Planning Practice Guidance.</td>
</tr>
<tr>
<td>Requiring space standards has not been assessed with regard to viability. Additionally, there may be a knock on impact related to the affordability of housing.</td>
</tr>
<tr>
<td>A transition period may be required so that developers can factor the increased cost into future land acquisitions.</td>
</tr>
<tr>
<td>Question raised with regard to how the accessibility standards will be enforced.</td>
</tr>
<tr>
<td>The Council should be working with existing providers, local groups and Adult Services’ Departments within the County Council to identify the level of need in both the social and private housing sectors, and such figures should then be used to determine the degree of housing which should be built to a standard much closer to the point of adaptation.</td>
</tr>
<tr>
<td>30% adaptable dwellings is too low. This should be increased to 80% in line with Eastleigh Borough Council</td>
</tr>
<tr>
<td>Optional water standards should be adopted as Portsmouth Water will now be distributing water supply to a greater extent. This will create possible water supply stress in the borough.</td>
</tr>
<tr>
<td>The Council would only have knowledge of a disabled person if they were on the Council Housing list. This would not account for disabled people who were looking to buy private housing.</td>
</tr>
<tr>
<td>No consideration has been made to topography and developers may design a development to make it ‘appear’ to be inaccessible and therefor argue that the requirement for adaptable properties is not needed.</td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- A requirement for residential garden sizes should be provided within the policy
- The percentage of M4(2) dwellings required should increase
- The optional water standard should be included

Comments where no changes considered necessary:

The Council’s ‘Specialist Housing Analysis’ sets out that space standards are necessary in Havant to help address the effect smaller homes can have on the physical and mental health of occupants.

The space standards have been assessed as part of the whole plan viability assessment. It is considered that no transition period is necessary as the viability assessment is based on current land values. Its inclusion in the Draft Local Plan gives landowners and housebuilders sufficient notice to prepare.

The policy proposes that accessibility and adaptability standards will usually be secured via a pre-commencement condition when granting planning permission. Should the dwellings not be provided in line with a planning condition, enforcement action may be taken to require the developer to make the necessary alterations.

The Council works with many statutory and non-statutory bodies including Hampshire County Council Adult Services, Occupational Health and social housing providers. The information provided by bodies such as
these, along with the whole plan viability assessment, have helped inform the proposed requirements. This information has included non-personal data with regard to the projected need for adaptable and adapted dwellings in both the affordable and private market.
The policy and its purpose of low carbon, well-designed, good quality and energy efficient homes is supported/endorsed.

Paragraph 5.86 is supported.

It is encouraged that the optional water efficiency requirement of 110 litres per person per day is adopted; as one fifth of household energy is used to heat water, increased water efficiency will reduce carbon emissions.

Some water companies have worked with Councils to offer discount on connection fees for developers who go further than the 110 litre requirements (e.g. installing smaller baths, additional water saving devices etc.)

To provide essential services and adapt to change in the regulatory process, flexibility is requested for public bodies.

Criteria a) to e) – Broadly supported in principle.

Criterion d) – Amend to “where possible, the development is intended to provide low or zero carbon energy”.

Criterion f):
- Amend to include “or equivalent” after BREEAM reference
- Add “for some development proposals, it is recognised that it will not always be appropriate to seek to meet these standards and in such circumstances, it will not be necessary to provide financial or technical advice”

Objection to the policy.

New building methods are more expensive; new housing must be both affordable to residents and attractive to developers.

It is more difficult for proposals which seek to extend existing floorspace to achieve such criteria.

The policy should not be unnecessarily restrictive; otherwise it may undermine the overarching strategic priorities of the plan being met.

The policy should be aspirational rather than a requirement; change to read “proposals for residential development will be encouraged to achieve….”.

The policy has not been subject to the required viability testing (Paragraph 173 of the NPPF).

Paragraph 2.2.4 of the Local Plan and CIL Viability Study (November 2017) states that no sensitivity testing was carried out regarding Code for Sustainable Homes (CfSH) or zero carbon.

Paragraph 95 of the NPPF supports energy efficiency improvements but does not categorically require them.

Criterion g):
- Should be deleted
- The Ministerial Statement allowed local planning authorities to set policies at Code 4 of the CfSH until the Deregulation Act had been introduced
- Section 43 of the Deregulation Act 2015 removes Part (1)(c) of the Planning and Energy Act 2008 which allowed local authorities to set energy efficient standards that exceed building regulations
- Applicants are only required to meet Part L of the Building Regulations; requirement above this is in direct conflict with national policy and standards
- Could be reworded to give greater weight to proposals which exceed building regulations
- Should be revised to allow flexibility regarding viability; this would be consistent with criterion f)
Home Quality Mark (HQM) may go some of the way towards replacing the withdrawn Code for Sustainable Homes. However; take up by companies, nationally, is mostly among SMEs rather than large corporate building companies.

HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to include:

- Further clarity in the supporting text about how applicants will be expected to meet enhanced energy efficiency standards
- An acknowledgment in the supporting text that other third-party assessments are available and that the use of these will need to be discussed with the Council through pre-application meetings
- That the Council will give greater weight to proposals which exceed criterion g)
- Flexibility regarding viability within criterion g) to be consistent with criterion f)

The optional water efficiency requirement of 110 litres per person per day has been considered under Policy E7 (High Quality New Homes).

Comments were no change is considered necessary:

- All applicants will need to show compliance with the policy regardless of whether or not they are a public body
- The Council considers that there is already sufficient flexibility regarding criterion f); we disagree with the suggested wording amendment that some development proposals should not have to provide financial or technical advice, as this would undermine the policy completely
- Criterion g) can be met without using new building methods
- Section 43 of the Deregulation Act has not yet been enacted. In addition, local plans have been adopted since 2015 which include higher efficiency standards above building regulations on the basis that they are viable
  - Enhanced energy efficiency standards (the equivalent of Code 4) were considered viable in the study, please see paragraphs 2.2.2 and 2.2.3 (page 24)
  - Paragraph 2.2.4 stated that no sensitivity testing was carried out in relation to higher efficiency standards (i.e. above Code 4); however, as set out in the summary table for the Local Plan and CIL Viability Study, this will now be considered
Support for policy.

Support the section on Historic Environment and Heritage Assets, particularly Policy E9. We consider that this satisfies the requirement of paragraph 157 of the National Planning Policy Framework for local plans to include strategic policies to deliver the conservation and enhancement of the historic environment.

Consider it important for local plans to include a more detailed policy or policies for the different types of heritage assets setting out the characteristics of each type of assets that the Council will expect development proposals to conserve and enhance, in order to provide an indication of how a decision maker should react to a development proposal as required by paragraph 154 of the NPPF.

Consider that a development management policy (or policies) is necessary as part of the positive strategy for the conservation and enjoyment of, and the clear strategy for enhancing, the historic environment required by the NPPF. This should include criteria for assessing the potential impact of development proposals on the significance of all relevant heritage assets.

Note that paragraph 5.105 states that “The Council has a positive strategy for conservation and enjoyment of the historic environment”. However, other than indicating that it will “appropriately manage development and determine planning applications……”, the Council does not explain what it’s positive strategy actually is.

We look to local plans to contain commitments to positive measures for the historic environment e.g. a programme of completing and reviewing conservation area appraisals, the implementation of Article 4 Directions where the special interest of a conservation area is being lost through permitted development, the completion of a list of locally important heritage assets or a survey of grade II buildings at risk. We see no indication of the Council proposing or committing to undertaking any of these proactive measures.

Whilst we acknowledge and welcome clause (b) of Policy E9, we consider that the Plan should specifically address the issue of heritage assets at risk as required by the National Planning Policy Framework.

Paragraph 5.107 of the Draft Local Plan states “The council has a positive strategy for the conservation and enjoyment of the historic environment in line with NPPF”. This sentiment must be measured against the content of the document.

Concern that paragraph 5.103 is not strong enough to preserve heritage in the Borough.

Concern about previous demolitions that have occurred and heritage assets in disrepair (see photos on original rep). Havant Borough Council should make use of its enforcement powers and something to the effect should be included in the draft Plan to prevent this from happening.

Concern that the requirement to protect, conserve and enhance the historic environment is too vague and therefore ineffective. To be consistent with national policy the wording should be aimed directly at heritage assets rather than the more broad historic environment.

Criterion (a) of policy E9 goes unjustifiably beyond NPPF in stating "Protect, conserve and enhance", without specifying the significance of the heritage asset, so is not consistent with national policy.

The policy should also include the phrase ‘where appropriate’ in criterion (a). Rewording suggested.

HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- The plan should include a more detailed policy approach for the different types of heritage assets
- A clearer strategy for the historic environment should be explored
- The plan should include commitments to positive measures for the historic environment
- The plan should address the issue of heritage assets at risk
Comments where no changes considered necessary:

This is a criteria based policy which assesses the impact of development on heritage assets. The Council considers that it is generally compliant with the NPPF.

The policy sets out the council’s approach to the historic environment.

The preservation of the Borough’s heritage assets is not solely reliant on Paragraph 5.103, it is for the policy as a whole to do that.

The HBLP 2036 is unable to address previous developments and demolitions.

Paragraph 126 of the NPPF requires local planning authorities to have a positive strategy for the conservation and enjoyment of the historic environment as a whole. Therefore, references to the protection, conservation and enhancement of the historic environment are considered appropriate. The policy also addresses heritage assets.

Paragraph 126 of the NPPF states that heritage assets should be conserved in a manner appropriate to their significance. This infers that all heritage assets should be protected to a certain degree. Therefore, it is not considered that criterion (a) goes beyond this as it does not specify the extent to which any heritage asset should be protected, conserved or enhanced.

The NPPF recognises that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Therefore, it is considered that conservation of all historic assets should be explored. It would undermine the policy to include the phrase ‘where appropriate’ in criterion (a).
<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>The PUSH Spatial Position Statement June 2016 supports strategic countryside gaps. Figure 18 shows the Draft HBLP2036 fails to identify a single gap between settlements</td>
</tr>
<tr>
<td>The infilling of the gap between Havant an Emsworth would be regrettable as it would be harmful to the identity of those settlements and the rural setting of the AONB;</td>
</tr>
<tr>
<td>Settlement boundary around Northney Marina is not logical, as it is isolated from other settlement areas</td>
</tr>
<tr>
<td>Principles of CS2 and AL17 of the current Local Plan, (prioritising development on previously developed land and protecting the undeveloped gaps between settlements) should be reinstated</td>
</tr>
<tr>
<td>Havant Borough is already one of the most built on in the UK. 5.112 sounds extremely hollow in this context. HBC should do more to resist small windfall sites, which do enormous damage to the local sense of place and distinctiveness, reduce recreational opportunities and sense of wellbeing, and put further pressure on our environmentally challenged water courses and further diminish our “rich and diverse natural environment” (HBC Draft Local Plan 5.171) and biodiversity.</td>
</tr>
<tr>
<td>Object to the use of settlement boundaries to arbitrarily restrict suitable development from coming forward on the edge of settlements. This does not accord with the positive approach to growth required by the NPPF. Suggest a much more flexible approach towards development adjacent to settlement boundaries.</td>
</tr>
<tr>
<td>E10 b - In addition to these criteria, there may be locational reasons for a development to be outside defined settlement boundaries, such as an extension to an existing operation that already exists outside the settlement boundary. Suggest additional criterion</td>
</tr>
<tr>
<td>Recreational access to undeveloped areas and the coast should not increase disturbance to the SPA; Criteria (a)(v) and (c)(ii)</td>
</tr>
<tr>
<td>Support for this policy / presumption against new development outside settlement boundaries is strongly supported.</td>
</tr>
<tr>
<td>Proposals for the use of settlement boundaries (criterion b) would have greater prominence in a separate or clearly headed Policy</td>
</tr>
<tr>
<td>Policy text should make it clear the lists comprise ‘or’ criteria and that development proposals do not have to comply with all of them to satisfy the policy overall.</td>
</tr>
<tr>
<td>Historic England welcome and support policy, although consider that it is rather light on townscape considerations. This would be an opportunity to refer again to Conservation Area Character Appraisals and Management Plans, as in the supporting text of paragraph 5.117, which we welcome and support.</td>
</tr>
<tr>
<td>The landscape has an historic content that contributes to character and local distinctiveness which could be overtly acknowledged in para 5.115.</td>
</tr>
<tr>
<td>HCC support point a.v. of this policy.</td>
</tr>
</tbody>
</table>

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft, with wording amendments.

In addition, consider how the policy may be amended to

- Protect designated nature conservation sites more clearly from recreational disturbance (criteria (a)(v) and (c)(ii)), although it should be noted that draft policies E15-E18 contain considerable protection
- Add ‘and’ or ‘or’ to criteria lists, to clarify whether all or individual criteria apply
- Highlight ‘settlement boundaries’ in the policy title
- Include additional references and provisions in relation to historic features in the landscape
- Include additional references and provisions regarding townscape
Comments where no change is considered necessary:

The PUSH Spatial Position Statement supports strategic countryside gaps, but it is not considered that any gaps of 'sub-regional significance', nor of 'fundamental local importance' exist in the Borough, which by themselves would outweigh the need for housing.

It is acknowledged that undeveloped gaps were protected by policies in the adopted Local Plan. However, in the new HBLP2036 it is no longer possible to continue this protection, as there are not enough brownfield sites and sites within the existing urban area to meet the Borough’s housing need. Therefore, greenfield sites outside of the existing urban area have had to be considered for development. Figure 18 draws the settlement boundaries around existing developed areas, and the proposed allocations in the draft HBLP2036, and E10 seeks to manage development outside of these areas (windfall sites).

The settlement boundaries on figure 18 are defined by the existing built-up areas together with the allocations in this plan. As Northney Marina is an allocation in this plan (H30), it would be inconsistent to exclude it from the settlement boundaries.

Disagree that E10 is too restrictive. The plan takes a positive approach to development, and it is not unreasonable to set criteria that development should comply with if it is outside of the areas identified for development. It is not considered that proposals on the edge of settlements or extensions to existing operations should be excepted from meeting these criteria.

It is not considered necessary to split out settlement boundaries into a separate policy, as there is a clear link to landscape and townscape quality.
<table>
<thead>
<tr>
<th>Summary of key issues raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not all relevant paragraphs of the NPPF have been referenced in the supporting text.</td>
</tr>
<tr>
<td>Plan fails to reference important documents with an influence on the AONB (e.g., SPD; Landscape Assessment)</td>
</tr>
<tr>
<td>Support for this robust policy / support stand-alone policy.</td>
</tr>
<tr>
<td>It is very important that landscape issues are appropriately considered with regard to the setting of the AONB and locally valued landscapes through the use of high quality design and green infrastructure.</td>
</tr>
<tr>
<td>Policy should cover development affecting the AONB, as well as development within the AONB.</td>
</tr>
<tr>
<td>Plan of AONB (Figure 19) is difficult to read.</td>
</tr>
<tr>
<td>HBC should consider whether there are areas of tranquillity within the AONB and wider Borough. If so, these should be identified and provided appropriate policy protection.</td>
</tr>
</tbody>
</table>

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy, largely as proposed in the regulation 18 draft, with amendments, such as improved mapping and referencing of relevant ‘where else to look’ documents.

In addition, consider how the policy may be amended to include:

- Its application to developments that affect the setting of the AONB, as well as developments within it.
- Identification of areas of tranquillity.
E12 - Managing Flood Risk in New Development

5 responses were received regarding this topic

Summary of key comments raised by residents and other stakeholders

Residents are concerned about flooding, because of springs, the high water table and level of proposed development.

Support in principle the importance of reducing the risks of flooding to protect people and property.

Support statement (5.137) which encourages developers to consider ways in which their development can reduce flood risk overall.

Supporting text (5.149) should be more flexible - while it should acknowledge that Flood Zone 1 is preferred, policy should not resist development in Flood Zones 2 and 3 in principle.

Together with E20 ‘Amenity and Pollution’, this policy should be part of co-ordinated Blue Infrastructure Master Plan.

It is not clear how sites will be made to deal with issue of flooding and future maintenance of any mitigation measures.

Past developments and current proposals do no inspire confidence that flood risk will be addressed effectively.

SuDS should also be reflected in this policy as well as in E13.

The Environment Agency (EA) supports the inclusion of this policy and sees it as essential given the flood risk in the borough from a variety of sources.

In relation to the requirement in 5.135 to provide a Flood Risk Statement, the criteria under which a Statement is required should be clearer.

In paragraph 5.139 it states that the sites allocated for development in this plan have gone through the sequential test as part of the plan’s sustainability appraisal. The EA is not satisfied that the evidence used to make these judgements is comprehensive enough. We therefore do not consider that the flood risk sequential test has been adequately demonstrated at this time.

The Local Lead Flood Authority (Hampshire County Council) suggests that Policy E12 criteria b. be amended by omitting ‘from rivers or the sea’ as this excludes other sources of flooding such as surface water. In respect to this point paragraph 5.133 currently states ‘As well as tidal flooding from the borough’s 48km of coastline, there are areas that are subject to flooding from streams, surface water run-off and rising ground water.’

There is little in the plan or the evidence base regarding a plan for flood protection for Hayling.

HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments.

In addition, consider how the evidence base can be improved to satisfy the flood risk sequential test for the site allocations in the plan.

Comments where no change is considered necessary:

- Various pieces of evidence and policies in the Local Plan deal with elements of blue infrastructure. However, the Council considers that an entire blue infrastructure master plan is outside the scope of a local plan.
- Paragraph 5.135 already sets out the circumstances under which a Flood Risk Statement would be required
- The approach to development in Flood Zones 2 and 3 is based on national planning guidance
- It is acknowledged that there is some overlap between the matters dealt with in policies E12 (Flood Risk) and E13 (drainage) it is not necessary to repeat provisions, as the plan must be read as a whole
- Future management and maintenance is dealt with in Policy IN4
• The reference to rivers and the sea in criterion b is accurate, as it refers to what is shown on the Environment Agency’s flood zone mapping
• Coastal defences are covered by the Infrastructure Delivery Plan and are supported through policy E14 ‘Areas of Coastal Change’
### E13 - Drainage Infrastructure in New Development
4 responses were received regarding this topic

#### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>It is not acceptable that residents’ associations and/or individual householders should become responsible for the management of SuDS, green space, land set aside for biodiversity mitigation and a range of other infrastructure features with little knowledge of how these features should be maintained.</td>
<td>Policy should encourage developers to work with Southern Water to extend sewerage provision to any nearby properties presently on private sewerage systems.</td>
</tr>
<tr>
<td>How will ongoing compliance to ensure ongoing maintenance and servicing of flood defences put in place be checked?</td>
<td>Southern Water support the principle aim of this policy, which is to reduce flood risk, as well as the detailed requirement for developers to connect to the nearest point of adequate capacity and take account of any existing underground infrastructure that may be present within the site.</td>
</tr>
<tr>
<td>Para 5.148 should be amended to include additional reference to Groundwater Source Protection Zones (SPZs).</td>
<td>Portsmouth Water welcomes this policy, and in particular paragraph 5.144.</td>
</tr>
<tr>
<td>The Environment Agency notes the intention to replace Policy CS15 and DM25. Currently, the wording of CS15 (policy and supporting text) appears to be inconsistent - is the minimum requirement of the policy that there is no net increase in surface water (as in para 5.142), or is it that there is a reduction in rates/volumes unless it can be proven that this is not possible (as in para 5.143 in line with DM25, and for which there is a justification and need in certain areas due to the pressure on the existing drainage infrastructure). We would suggest that the first bullet in the policy should be amended to become more aspirational and look to reduce runoff below pre-development rates with some justification required where this is not possible. There are areas of the borough, such as Emsworth, where a reduction is really important.</td>
<td>Policy E13 will replace Policy CS15 in the Havant core Strategy. CS15 included the statement that ‘Priority should be given to incorporating Sustainable Drainage Systems (SuDS) to manage surface water drainage, unless it is proven that SuDS are not appropriate.’ This is consistent with the approach in the NPPF. However, this is no longer the case with the draft Policy E13, as all references to SuDS are now contained in the supporting text that explains how the policy works (paras 5.147 and 5.148). Hampshire County Council suggests that the old wording is retained in the actual policy wording of Policy E13.</td>
</tr>
<tr>
<td>Page 74 bullet point f: it is essential that SuDS systems are adequately maintained, so it is good that maintenance is part of the policy.</td>
<td>Hampshire County Council suggests that the old wording is retained in the actual policy wording of Policy E13.</td>
</tr>
<tr>
<td>Surface water management and the provision of sustainable drainage systems are frequently contentious matters especially in areas of fluvial flooding. The successful installation of SuDS is dependent on contractor’s competence.</td>
<td>Hampshire County Council suggests that the old wording is retained in the actual policy wording of Policy E13.</td>
</tr>
<tr>
<td>Policy should be clearer that SuDS may not be appropriate in Groundwater Source Protection Zones (SPZs), and that risk assessments should be required.</td>
<td>Hampshire County Council suggests that the old wording is retained in the actual policy wording of Policy E13.</td>
</tr>
</tbody>
</table>

#### HBCs proposed way forward for Regulation 19 HBLP2036

- Proceed with policy as proposed in the regulation 18 draft, and consider wording amendments to:
  - remove any inconsistencies between the policy and the supporting text
  - consider which elements best sit in the policy itself or in the supporting text.

- Comments where no change is considered necessary:
  - Developers cannot be compelled to rectify pre-existing problems
  - Ongoing compliance and maintenance can be covered in legal agreements (see also policy IN4).
  - Paragraph 5.148 already extensively qualifies that SuDS are not appropriate everywhere.
<table>
<thead>
<tr>
<th><strong>Summary of key issues raised by residents and other stakeholders</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>This policy and plan for Beachlands under KS4 is contradictory</td>
</tr>
<tr>
<td>Policy should also promote that coastal areas identified as not being suitable for development should be used in flood risk management schemes which work with natural processes</td>
</tr>
<tr>
<td>Support North Solent Shoreline Management Plan to provide flood protection in the Langstone area and thereby protect the A3023 Langstone road and road bridge to Hayling island.</td>
</tr>
<tr>
<td>HCC support point b.1.e) of this policy.</td>
</tr>
</tbody>
</table>

<table>
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<tr>
<th><strong>HBCs proposed way forward for Regulation 19 HBLP2036</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Proceed with policy as proposed in the regulation 18 draft. However, also</td>
</tr>
<tr>
<td>- Review boundaries to remove any overlap between Coastal Change Management Areas in E14 and site boundaries in KS4, to remove apparent contradiction</td>
</tr>
<tr>
<td>- Consider whether policy should be amended to make reference to flood risk management schemes which work with natural processes</td>
</tr>
</tbody>
</table>
Summary of key comments raised by residents and other stakeholders

The policy is welcomed/supported.

The policy is endorsed as it is a positive approach to considering development proposals close to or within areas of ecological value and supports the use of mitigation where necessary.

The policy is compliant with Paragraph 113 of the NPPF; local authorities are required to weigh decisions on ecological sites against their importance and contribution to the wider ecological network.

The presumption against development involving the loss of biodiversity/natural features is agreed.

The Lawton Report (2010) highlighted the need for a step-change in the approach to wildlife conservation; the Council should embrace the natural environment by outlining the protection and enhancement of biodiversity within the Borough as a key asset which underpins the local plan.

National Planning Policy requires proposals to deliver no net loss in biodiversity; the Council should look to deliver net biodiversity gains as a minimum.

The Government’s 25 Year Environmental Plan sets out a commitment to halt current biodiversity decline and ensure existing requirements for net gain for biodiversity are strengthened in national planning policy.

The definition of conserving biodiversity includes “in relation to a living organism or type of habitat, restoring or enhancing a population or habitat” - in other words, delivering net gains.

Recent studies show that much of the wildlife outside of protected areas is declining.

It is recommended that the policy includes the protection of irreplaceable habitats, such as ancient woodland and aged/veteran trees. Standing advice from Natural England and the Forestry Commission has been produced.

There should be a policy to protect as many existing natural features, i.e. trees and hedgerows, as possible.

It would be welcomed if the Council provided a greater willingness to avoid impacts in biodiversity, such as:

- The routine use of pre-emptive TPOs on likely development sites
- The use of hedgerow regulations for protection purposes
- Measures to prevent the increasing fragmentation of habitats in the Borough

The Borough lost more trees than it planted in 2015/16.

The following are required to ensure an effective collaboration between the Council and local conservation groups; the Havant Borough Tree Wardens (HBTW) are willing to provide support to facilitate the production of these:

- **Tree Strategy** - an effective strategy must be put in place that maximises the benefits trees and woods can deliver to local communities
- **Havant Borough Biodiversity Action Plan** - an update is long overdue.

Table 5 - The specific international and national conservation designations in the Borough should be listed.

**Paragraph 5.173** - Add “water resources provided by the Borough’s groundwater reserves, springs and rivers, necessary to provide a water supply to the area’s homes and businesses”.

**Criterion b):**

- Reference to net gain in biodiversity is supported
- Amend to ‘the development results in a net gain in biodiversity’
- Biodiversity is not a tangible/measurable entity, replace with “improvements to wildlife habitat”

**Criterion c):**

- Pleased to see the inclusion of this criterion
• As adopted policy DM8 has been lost, the wording should be strengthened to “and new wildlife corridors implemented around development, which should incorporate existing trees and natural features into the overall design”

Criterion d):
• Most trees are not the subject of a TPO so are vulnerable to loss
• “Replacement tree of at least equal value” is hard to measure so should be replaced with “replacement tree of a native species and of suitable maturity”.

Criterion j):
• Should be deleted; development cannot outweigh the value of SINCs and LNRs
• Add that “the site incorporates native species planting in a submitted landscaping scheme”
• In line with paragraph 5.174, amend to “where the benefit of the development can be shown to clearly outweigh the substantive nature conservation value of the site and the impact cannot be avoided or mitigated, compensation will be provided”.

A criterion should be added relating to the protection of the water environment (wording submitted).

Suggestion that the policy and supporting text includes a requirement for all planning applications to be accompanied by a Biodiversity Mitigation and Enhancement Plan (BMEP) that has been approved by a Hampshire County Council (HCC) Ecologist.

A metric to evaluate the loss and gain of biodiversity through development to assess avoidance, mitigation and, where necessary, compensation measures (which is already used by many local authorities) would also ensure the Council delivers its obligations under the NERC Act.

The field west of Southmoor (which should be designated as a LNR if applicable), Southmere Field, Langstone Meadows (already designated local green space) and fields south of Wade Court/Lane form a linked network/wildlife corridor that should be preserved.

A key mechanism should be to establish the creation and maintenance of functioning ecological networks.

Suggestions made for TPOs of specific individual trees.

HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to:

• Further emphasise the protection and enhancement of biodiversity as a key priority of the local plan
• Include a specific list of international and national conservation designations in the Borough in conjunction with Table 5, although this could be better placed in the forthcoming Havant Biodiversity Strategy
• Include a requirement to protect ancient woodland and aged/veteran trees as set out in the standing advice published by Natural England and the Forestry Commission, either as a criterion in this policy or in a stand-alone policy
• Include a requirement regarding the protection of the water environment, either as a criterion in this policy or in a stand-alone policy
• Include a requirement for BMEPs
• Include and map ecological corridors, where appropriate, once the Havant Borough Biodiversity Strategy is completed and its findings are available

In addition to the above, further investigation and discussion with Natural England is required to ascertain whether and how a biodiversity metric could be used.

As stated in the summary table for Policy E16 (Solent Special Protection Areas), Policy E15 will also need to consider the adverse effects of development, in terms of water quality, light intrusion and noise, on the integrity of European sites.
Comments where no change is considered necessary:

1) Havant Borough Biodiversity Strategy:

The update to the Havant Borough Biodiversity Action Plan (BAP) is underway and its working title is the Havant Borough Biodiversity Strategy. The emerging strategy will incorporate the updated Solent Waders and Brent Goose Strategy, the ecological mapping work of the Local Nature Partnership (LNP), an audit of all the local conservation designations in the Borough along with the recommendations of the Government’s 25 Year Environmental Plan. It is anticipated that the strategy will then be able to identify key ecological/wildlife corridors and recommend strategies to achieve net biodiversity gain at both the Borough and micro-level. The findings of the strategy will be used to inform the Pre-submission Local Plan 2036.

The benefits that trees and woodlands provide to local communities and ecological networks will be considered through the Biodiversity Strategy.

2) General:

- The Council surveyed the trees within most of the proposed development sites and made TPOs (where appropriate) prior to the sites’ potential consideration in the plan was made public.
- The fragmentation of habitats is addressed in the policy (see criterion c)
### Summary of key comments raised by residents and other stakeholders

The policy is supported.

The Partnership for Urban South Hampshire (PUSH) Joint Committee endorsed the Solent Recreation Mitigation Strategy in December 2017; each authority must now approve the strategy by 1st April 2018.

**Paragraph 5.192:**
- The text should state that the SPA of relevance is the Chichester and Langstone Harbours SPA.
- The SPA is also designated in recognition of its breeding terns (Little, Common and Sandwich).
- Although the predominant interest is during the winter and migration periods, the summer is also relevant.
- It is stated that Figure 23 illustrates the SPAs; however, it shows the 5.6km zone of influence.

**Paragraph 5.193** - This does not appropriately reflect the legislation and should be amended to read: "The Habitats Regulations [Footnote 46] set out the sequence of steps to be taken by the competent authority when considering authorisation for a plan/project that may have an impact on a European site and its species before deciding to authorise that project. Avoidance and mitigation measures can be considered by the Council (as the competent Authority under the regulations). The competent authority shall agree to the project only after having ascertained that it will not adversely affect the integrity of the SPA and its species”.

**Paragraph 5.194** - Amend to ‘an acknowledged issue for any new residential development….”

**Paragraph 5.197:**
- Amend reference to the interim strategy for accuracy (amended working submitted).
- It is premature to state that the strategy has been successful, suggested amendment to paragraph submitted.

**Paragraph 5.198** - The aim should be to maintain access but not increase it.

**Paragraph 5.199** - While it may be preferable to be straightforward or cost-effective, this reference is misleading and should be removed.

**Footnote 46** - This should be referenced as the Conservation of Habitats and Species Regulations 2017.

**Criterion a)** - Amend to specify that the financial contribution is in line with the Solent Recreation Mitigation Strategy.

**Criterion b)** - Amend to read “…. development supported by evidence that it will avoid or mitigate any likely significant effect on the SPAs”.

In the final paragraph of the Policy Box add “either alone or in combination with other plans or projects”.

Request that all allocation policies within the 5.6km zone of influence state that “mitigation for recreational disturbance is provided in line with policies E16 and E17”.

Sites which are in close proximity may need to provide mitigation measures in addition to making a financial contribution; this should be reflected in the policy and supporting text, as well as individual site allocations.

Alongside Natural England, both the Langstone Harbour Board and the Chichester Harbour Conservancy should be consulted.

The policy only addresses increased recreational disturbance due to new housing; however, due to potential risks and impact pathways some development may need to consider other impacts such as those on water quality, light intrusion and noise etc. To address this, development policies should have additional text to state that development will only be permitted where “the development includes measures to avoid and mitigate any adverse effect on the integrity of European sites”.

**HBCs proposed way forward for Regulation 19 HBLP2036**
Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to include:

- A map which shows all three Special Protection Areas (SPAs) along with the 5.6km buffer.

It is envisaged that this policy will seek to mitigate recreational impact on the SPA (the policy title may need to be amended to reflect this). Therefore, the suggestion that the policy should have regard to other adverse effects (i.e. water quality, light intrusion and noise) on the integrity of European sites, should be considered as part of Policy E15 (Ecological Conservation).

Comments where no change is considered necessary:

- Havant Borough Council’s Cabinet approved the Solent Recreation Mitigation Strategy, along with its implementation from 1st April 2018 onwards, unanimously on 7th February 2018
- The HRA considers whether on-site measures may be needed alongside a contribution to the strategic project. This has led to several references in site allocations to this. This matter will be continue to be assessed through the HRA process.
- The policy has been drafted in line with the Solent Recreation Mitigation Strategy, the strategy seeks to actively encourage coastal visitors, but so that visitors enjoy their time in a responsible manner rather than restricting or preventing access to the coast
- All the sites proposed for allocation are in the 5.6km zone of influence; therefore, a developer requirement that states mitigation for recreational disturbance is provided in line with this policy for all sites may not be required
- Natural England are the government’s adviser for the natural environment in England and are thus a statutory consultee for certain types of planning applications. Both the Langstone Harbour Board and the Chichester Harbour Conservancy are not statutory consultees; however, they are both welcome to comment on whichever applications they wish to
### Summary of key comments raised by residents and other stakeholders

The policy is welcomed and supported.

The Solent Wader and Brent Goose Strategy is finalised; minor wording changes will be required.

Support for the adoption of land as permanent wader and Brent Goose refuges. It is recommended that the potential refuge areas are identified on the Proposals Map.

Support for the flexible approach taken to mitigate any impact development on the support areas.

The policy is compliant with Paragraph 113 of the NPPF which establishes a requirement for local authorities to weigh decisions on development affecting protected wildlife against their importance and contribution they make to the wider ecological network.

Submitted wording amendments for paragraphs 5.210, 5.211, 5.213 and 5.217.

It is critical that the network of sites available to Brent Geese and waders is future proofed to account for climate change and coastal erosion. The Solent Wader and Brent Goose Strategy is being updated; it is anticipated that future important sites will be considered, this will need to be reflected in the HBLP 2036.

It is welcomed that the individual site allocations highlight the need for mitigation in line with Policy E17.

All sites identified as affecting wader and Brent Geese should consider in their design and layout:

- The need to ensure any aim to improve access or provide open space are considered holistically, to ensure areas used by the birds or proposed as mitigation and not undermined by recreational disturbance
- That access management should be identified as a necessary consideration with Policy E17

Under both Core and Primary Support Areas, wording should be included to reflect the importance of the Core and Primary Support Areas and how it is envisaged that any development that is likely to impact these sites would be considered as part of the Local Plan process.

The classifications in some areas do not reflect survey findings; e.g. sites which surveys have shown to be unused are listed as Secondary Support Areas.

The policy should be amended to set out that any loss of habitat must be replaced prior to development but it cannot require it to be evidenced that it works.

No evidence has been produced to support the need for an 80-year management commitment for mitigation areas. This is more than previous requirements, i.e. 25 years.

Disagreement that in-perpetuity can be defined as 80 years and that it is not an appropriate interpretation of the legal requirements. Suggestion to change criteria e) and g) to “for a minimum of 80 years by a legal agreement”.

The policy only allows for financial contributions for mitigation on low use and uncertain sites, this should be amended to allow a contribution for all circumstances if it can be demonstrated it has wider benefits.

There is no legal or policy basis for the assumption that proposals with the potential to impact upon sites forming part of the Brent Goose supporting habitat network will require a project level Habitats Regulations Assessment (HRA).

The assertion that the network of supporting habitat sites are effectively part of the SPA is incorrect and baseless. Although it plays a supporting role, the sites have not been deemed of sufficient importance to be brought within the Natura 2000 network of sites. Losses to the network should not be considered synonymous with losses to the SPA.

There is no clear definition of how the proposed hierarchy of supporting habitat sites have been derived and how particular sites are attributed to different classifications. There is limited evidence for the designation of Land at St Mary’s Road (Land at Rook Farm) is a Core Area.
CORE AREAS:

Criterion c) - Amend typo.

The policy and its supporting text are contradictory in relation to Core Areas; the later assets that it is not considered feasible to provide avoidance and mitigation measures yet the policy states it is possible in exceptional circumstances.

It is unclear why there is a requirement for any mitigation areas to be in close proximity to the supporting site being lost; it is apparent from the current Solent Waders and Brent Goose Strategy (SWBGS) that birds will use any site in the vicinity of the SPA that provides foraging opportunities.

It is unclear why the provision of a greater area of mitigation land is required for the loss of Core Areas when the same requirement does not apply to the loss of Primary Support Areas.

Wintering Bird Surveys undertaken on Land at Rook Farm (between November 2017 and February 2018) have not recorded any Brent Geese utilising the site due to its current management regime (ploughed field). Where a site is unavailable for at least one winter due to standard agricultural management practices, and this does not result in any significant impact to the SPA populations, then a site is not essential to the continued function of the SPA.

PRIMARY SUPPORT AREAS:

Proposed site H31 was used as a mitigating area for the Oysters development so should not be built on.

Disappointment in seeing sites identified as Primary Support Areas included in the Draft HBLP 2036.

Questions raised as to why Southern Water’s Budds Farm Waste Water Treatment Works (WTW) is a “Primary Support Area” (Figure 24).

Paragraph 5.222:

• This needs to be revised to reflect that until a mitigation package has been considered for the loss of a primary support area, that it is not possible to confidently conclude that this opportunity exists.
• Amend second sentence to read ‘While the use of these sites may on occasion pass the threshold for classification as the Core Sites, development on parts of these sites may be acceptable’.
• Amend third sentence to read ‘It is considered that there may be opportunities for these sites to feasibly secure mitigation to ensure the long-term preservation and enhancement of the Brent Goose and Wader network, which will be considered on a case-by-case basis’.

Paragraph 5.223:

• It is agreed that the mitigation package must be “robust”.
• It would be inappropriate to lose a primary support area to secure the maintenance of a nearby core site; it is requested option i) is deleted.

Objection to the provisions of Policy E17 and the strict requirements it sets for development proposals coming forward on wader and Brent Geese feeding and roosting sites.

SECONDARY SUPPORT AREAS:

Further clarification is needed regarding the role of Secondary Support Areas prior to criterion f). Suggestion to include the following paragraph: “Secondary support areas offer a supporting function to the core and primary support ecological network. These sites become important when wader or Brent Geese populations are higher or when the habitat is in suitable management. The use of sites by Brent Geese varies between
years as a result of a number of factors including population size, breeding success of the previous summer and number of juvenile birds”.

**LOW USE & UNCERTAIN SITES:**

It is strongly recommended that Low Use and Uncertain Sites are treated separately; this should be reflected in the policy and supporting text to provide greater clarity.

It is important that low use sites are not undervalued and that the proposed text provides greater clarity regarding the need to consider the potential role of these sites now and going forward.

Further clarification is needed regarding the role of Low Use/Uncertain Sites prior to criterion h). Suggestion to include the following paragraph: “All Low Use/Uncertain sites have recorded use by Brent Geese Waders and have the potential to be used if managed appropriately and therefore in all cases proportionate mitigation / enhancement measures will be required”.

Both Low Use and Uncertain sites will have evidence of use of at least one record since the winter 2006/07, therefore it is recommended that criterion h) is amended to “If it can be shown that neither Brent Geese nor waders no longer use….”

The survey requirements to demonstrate that the land is not used by waders and/or Brent Geese are again three continuous years (previously two was often accepted), during such time the site must be kept in a suitable condition for use by waders and Brent Geese. It would not be lawful of Havant to impose restrictions on how landowners manage their land with the threat of refusing development in the future. This element needs removing from the policy to ensure it is sound.

Figure 24 - The map has recently been modified, HIWWT can provide replacement.

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft with wording amendments, along with an update to Figure 24 once the Solent Waders and Brent Goose Strategy (2018) has been published. In addition, consider whether the policy should be amended to include:

- Any future important sites (due to climate change)
- The suggested deletion of option i) of paragraph 5.223, which offers the possibility of mitigating development on a primary support area by improving a nearby core site
- Further clarification about the role of Secondary Support Areas [it may be more appropriate to include such wording within paragraph 5.228 rather than prior to criterion f) as suggested]
- Further clarification about the role of Low Use/Uncertain Sites [it may be more appropriate to include such wording within paragraph 5.230 rather than prior to criterion h) as suggested]
- The identification of the potential Brent Goose Refuges on Figure 24 and Proposals Map
- The scale, size and nature of mitigation required on any primary support areas allocated for development in the HBLP 2036 [please note: this will be included in the upcoming Havant Biodiversity Strategy]
- Wording in the supporting text which clarifies that development on core and primary support areas has been and is being considered as part of the Local Plan process.
- Clarity over whether development on Core Areas is not feasible or if it is possible in exceptional circumstances
- Budds Farm WWTW boundary will be redrawn to remove the built areas of the facility within data and maps in the finalised strategy. This specific change will be reflected in the Pre-Submission Local Plan.
- An amendment to clarify that the effectiveness of mitigation would not need to be proved prior to the commencement of house building but that it should follow the best scientific information at the time

It has been suggested that all allocated sites in the plan identified as affecting Solent waders and Brent Geese should consider, in their design and layout requirements, the access management and location of open space so that mitigation is not undermined by human recreational disturbance. Whilst the Council agrees with this suggestion, we do not believe that it is appropriate to reference this in every site allocation.
which affects Solent waders and Brent Geese. Instead, this should be included in the policy and supporting text of this policy (E17).

Further investigation is required to ascertain whether in-perpetuity can be defined as 80 years or whether an explicit statement that mitigation must be secured for a minimum of 80 years by a legal agreement is necessary.

Comments where no change is considered necessary:

It is appreciated that the content of this policy could have been confusing given that it was not based on a published Solent wide approach as previous policies have been. However it was prepared in line with the emerging Solent Waders and Brent Goose Strategy and in consultation with Natural England. The updated Solent Waders and Brent Goose Strategy (2018) is being prepared and will be published in due course and will inform the Pre-Submission version of the Local Plan.

The Council will use the updated strategy, along with further ecological work from the Local Nature Partnership (LNP) and the Hampshire Biodiversity Information Centre (HBIC) and evidence of previous mitigation measures (e.g. Oysters, Hayling Island), to ascertain appropriate ecological/wildlife corridors in the Borough within the Havant Biodiversity Strategy. The scale, size and nature of the proposed Brent Goose Refuges, along with the mitigation required for any Primary Support Areas allocated for development in the HBLP 2036 will also be outlined in the biodiversity strategy and future revisions of this policy.

Due to the high need for housing in the Borough, it is not possible to avoid development on two Primary Support Areas (H31 and H41). As such, it is important that these sites, and their status for Solent waders and Brent Geese, are identified in the local plan so that appropriate mitigation which contributes to the wider solent wader and Brent Goose network is secured.

The Council disagrees with the suggestion that financial contributions for mitigation should be allowed for all circumstances and not just for the development of low use and uncertain sites. To protect and, where possible, enhance the solent wader and Brent Goose network, it is vital that physical mitigation is provided upfront. Moreover, for comments regarding survey requirements for low use and uncertain sites, it should be noted that the emerging Solent Waders and Brent Goose Strategy (2018) has significantly reduced the amount of uncertainty relating to the use land by these species. The Council will also continue to survey sites to improve further certainty.

The Council considers that the loss of sites which are confirmed as functionally linked to the SPA requires assessment under the Habitats Regulations. These species are the qualifying criterion for the SPA designation. These feeding and roosting sites are, therefore, functionally linked to the SPA and, as such, are worthy of the level of protection as set out in the wording of this policy. Furthermore, the HRA handbook states that, regarding any species listed in Annex I of the Birds Directive (and regularly occurring migratory species not listed in Annex 1), competent authorities are required ‘to strive to avoid pollution or deterioration of the habitats of such species outside the area of classified SPAs’.

From the above, the Council asserts that there is a legal/policy basis that potential impact upon sites forming part of the Solent Wader and Brent Goose network would require a project level Habitats Regulation Assessment (HRA). Please see advice from Natural England regarding functionally-linked land the consideration of a HRA as well as Regulation 63 of the Conservation of Habitats and Species Regulations 2017.
### E18 - Protected Species

5 responses were received regarding this topic

#### Summary of key comments raised by residents and other stakeholders

Support for the policy.

**Paragraph 5.236 - This should include a reference to Solent Waders.**

**Paragraph 5.249 - Regarding Havant Thicket Reservoir (KS8), there is concern that Portsmouth Water may be seen as having “deep pockets” to fund ongoing monitoring to confirm no overall harm to the species.**

Previous survey work has shown that Bechstein’s bat utilise KS8 for foraging; a maternity roost has been recorded using parkland trees adjacent to the site also.

Concern that the current wording may create a barrier to obtaining planning permission for the Havant Thicket Reservoir (KS8). The development will not be able to show no net loss of woodland; instead Portsmouth Water’s mitigation strategy would be focused on ensuring that connectivity is maintained between the woodland blocks north and south of the proposed reservoir by planting a new woodland strip east of the reservoir and enhancing boundary hedgerows.

It is important to ensure robust monitoring of mitigation measures is carried out as mitigation measures for a species which is known to avoid artificial illumination (Bechstein’s bat) are untested.

**Criterion f) - Suggestion to add that the removal of individual trees should also be avoided. This because previous surveys have identified roosts within standard trees within fields with Bechstein’s bats foraging in adjacent woodland. This is similar on the continent where the species is associated with parkland-type habitat.**

It is recommended that the HBLP sets out a strategic approach to plan positively for the creation, protection, enhancement and management of networks for biodiversity and protected species.

It is recommended that ecological corridors are established in the forthcoming Havant Biodiversity Strategy to enhance wildlife links:

- From the proposed Brent Goose refuge at Broadmarsh north along the A3(M) corridor (encompassing H15 and H41)
- From the coastal area south of Warblington, through KS5 and the Emsworth Common through multifunctional green infrastructure
- In the north of the Borough as identified by the Bechstein’s bat area

No support for the final paragraph in the policy box as this provides developers with a “get out”. Suggestion to replace with “Where the above measures cannot be met planning permission will be refused”.

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft with wording amendments. The forthcoming Havant Biodiversity Strategy will consider how to incorporate the recommended ecological corridors once the Council has received the ecological network mapping work undertaken by the Local Nature Partnership (LNP). The incorporation of the LNP’s work will also help inform the positive strategic approach, recommended above, for the creation, protection, enhancement and management of the Borough’s ecological networks and its protected species.

Comments where no changes are considered necessary:

The final paragraph in the policy box is considered to comply with the Habitats Regulations.
Support for the policy.

The policy should include a map or a list of areas which contain BMV agricultural land.

New agricultural land classification (ALC) surveys may be required for sites allocated in the plan.

It is strongly recommended that appropriate agricultural land and soil surveys are undertaken for sites on BMV agricultural land so that the land of highest agricultural quality is retained as areas of open space within a development's master plan.

BT&W v SSCLG and Gladman Developments Ltd [2016] EWHC2 concluded that Paragraph 112 of the NPPF cannot be characterised as a policy which indicates that “development should be restricted” within the context of Paragraph 14 of the NPPF (and associated footnote 9).

There is no justification to refuse permission on sites that constitute BMV agricultural land.

Sites of BMV agricultural land should not be developed.

Agricultural land should be sold to the Council at the original designated agricultural cost for the benefit of Local Council owned housing in order to provide homes for the homeless.

Objection to the on-site community growing provisions (e.g. allotments) as part of onsite open space requirements as the Site H28 will result in a net increase of 45 and not 50 dwellings.

Southleigh (KS5) is allocated for development, yet perversely, Policy E19b now protects BMV land.

It cannot be right to use prime agricultural land to build new homes; once this land is built on it will never again be available to grow food. With uncertainty over Brexit, we may need all our agricultural land.

The use of prime agricultural land for housing on Hayling Island is short-sighted given then local food production is healthy and helps cuts down heavy lorry deliveries.

HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to:

- Clarify that criterion a) requires that greenfield sites allocated for 50 dwellings or more (gross), which contain BMV agricultural land, must include community food growing provisions as part of the open space required under Policy E2
- Include a link to the sources used to ascertain a site’s agricultural land classification (ALC) as listed in Appendix 2 in the Sustainability Appraisal of the Draft Local Plan 2036 (December 2017)
- Include a requirement that agricultural land and soil surveys are undertaken for sites on BMV agricultural land to ascertain the location of the highest quality soil and, thus, inform the location of open space and community food growing provisions

Comments where no change is considered necessary:

When considering sites suitable for allocation, the Council has sought to prioritise brownfield sites and greenfield sites of lower agricultural quality. However, the available evidence is that the majority of land in the Borough is of the best and most versatile (BMV) quality. Therefore, the allocation of housing sites of BMV agricultural land is unavoidable if the Borough is to meet its housing need. In order offset the loss of BMV agricultural land, the policy identifies a need for development on land of BMV quality to include community growing provisions (such as allotments) as part of the open space provision. Please note,
criterion b) refers to unallocated greenfield sites, therefore the criterion would not apply to the development of Southleigh (KS5).

It is considered that as the HBLP 2036 is aiming to meet and exceed the Borough's objectively assessed need (OAN) for housing, best and most versatile (BMV) agricultural land should be safeguarded in line with paragraph 112 of the NPPF. It is not explicitly stated that planning permission will automatically be refused on unallocated greenfield sites. The wording of the policy states that permission on unallocated greenfield sites containing BMV agricultural land is ‘likely to be refused’ and ‘unlikely to be supported’. This indicates that there is still some scope for flexibility if further material considerations arise.

The Local Plan cannot require land to be sold to the council to provide housing.
Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comments</th>
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<tbody>
<tr>
<td>Support policy as amenity is important for visitors so that they are not deterred.</td>
</tr>
<tr>
<td>Reference possible adverse impact of lighting glow on South Downs National Park.</td>
</tr>
<tr>
<td>Tranquillity and associated visual and noise intrusion mapping should be referenced.</td>
</tr>
<tr>
<td>Lighting requires careful planning and monitoring to ensure local areas are safe and there are minimal impacts on wildlife and their corridors. The Borough should play its part in preventing light pollution.</td>
</tr>
<tr>
<td>South Downs International Dark Sky Reserve is less than 10 miles from the Borough’s boundaries.</td>
</tr>
<tr>
<td>HCC support this policy.</td>
</tr>
<tr>
<td>HBRA are concerned regarding traffic congestion and air quality across the Borough and particularly where there is poor air quality around schools such as Park Road South next to Bosmere School as this is likely to worsen with additional traffic movements in the Borough as new housing and employment sites are developed.</td>
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HBCs proposed way forward for Regulation 19 HBLP2036

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<th>Comments</th>
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<tbody>
<tr>
<td>Proceed with policy as proposed in the regulation 18 draft with minor wording amendments.</td>
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<tr>
<td>Further evidence required:</td>
</tr>
<tr>
<td>A sub regional assessment of air quality following proposed development is underway which will examine the impacts on human health and include recommendations for mitigation.</td>
</tr>
<tr>
<td>Comments where no change is considered necessary:</td>
</tr>
<tr>
<td>The NPPF is clear that planning policies should be focused on the acceptable use of the land (rather than environmental control processes). The policy considers light and any significant negative effect on ‘the wider environment’, both in terms of the national park and habitats.</td>
</tr>
<tr>
<td>In terms of potential impacts on tranquillity, it is considered that the policy already sets out an appropriate approach to the assessment of noise.</td>
</tr>
<tr>
<td>Visual impact considerations are adequately addressed through policies E6 (High Quality Design) and E10 (Landscape and Townscape) policies.</td>
</tr>
</tbody>
</table>
### E21 - Contamination
2 responses were received regarding this topic

<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Welcomes the policy and appreciates acknowledgement to material risk to groundwater.</td>
</tr>
<tr>
<td>Support the inclusion of this policy.</td>
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</tbody>
</table>

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<thead>
<tr>
<th>HBCs proposed way forward for Regulation 19 HBLP2036</th>
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<tbody>
<tr>
<td>Proceed with policy as proposed in the regulation 18 draft, with wording amendments.</td>
</tr>
<tr>
<td>Summary of key comments raised by residents and other stakeholders</td>
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<tr>
<td>---------------------------------------------------------------</td>
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<tr>
<td>The policy should be broader and also deal with the ecological needs of watercourses</td>
</tr>
<tr>
<td>The policy does not integrate surface water management considerations</td>
</tr>
</tbody>
</table>

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft.

**Comments where no change is considered necessary:**

- Consideration of the ecological impact of development is provided through policy E15
- Consideration of surface water management is provided through policies E13, E20 and IN4 as well as through individual site allocation policies
Housing
## Summary of key comments raised by residents and other stakeholders

### Housing Need/Target

The identified housing requirement should be accommodated in the Local Plan, unless there are policies elsewhere in the National Planning Policy Framework that provide strong reasons for restricting development.

Support for approach to meeting housing need and meeting Objectively Assessed Need (OAN).

Support the intentions of Policy H1 to exceed the average annual requirement for new homes in Havant Borough when assessed against the PUSH OAN (2016 SHMA update) and the PUSH Spatial Position Statement.

Evidence of a shortfall of identified capacity to meet needs in the Portsmouth housing market area of almost 4,200 homes. Would continue to urge Havant Borough Council to actively seek opportunities to identify additional potential for housing provision in line with the PUSH Position Statement.

Concern that there is a significant unmet need which is not being effectively planned for in the HMA and which is unlikely to be met. Implications for Duty to Cooperate and Test of Soundness.

Concern that the proposed distribution of housing set out in the PUSH Spatial Position Statement sets housing significantly lower the needs assessment for both the Portsmouth and Southampton HMAs.

Use of Government’s proposed standard methodology for housing need supported.

Support for committing to the higher annualised requirement from Government proposed methodology for calculating housing need although this is subject to change and cannot be given full weight until it is adopted.

The Council should be mindful about any changes that arise to the Government’s methodology as currently proposed before its introduction.

The PUSH Position Statement’s policy H1 suggests that ‘local authorities should actively seek opportunities to identify additional potential for housing provision to address the shortfall against the objectively assessed need through the local plan process’. It appears that the Plan has sought to do this and this approach should be maintained in view of the wider needs of the PUSH area.

Policy in line with PUSH Position Statement Policy H1.

Greater clarification in simple terms of how the figures are derived would be welcome.

Question over validity of the total housing need.

There should be a greater level of scrutiny of the figures rather than taking these at face value.

Objection to the housing number in the draft Local Plan on the basis that Havant is being expected to take considerably more than its own indigenous need should suggest. This has a knock-on effect on the number of greenfield sites required.

Objection to increased number of greenfield sites in the draft Local Plan.

Concern that none of the PUSH calculations or reports on housing numbers have been subject to public consultation or scrutiny by an independent inspector.

Derivation of the figures in the PUSH Spatial Position Statement and how it differs from calculations of the PUSH SHMA is not clear and has not been subject to consultation.

Concern that people are being double counted (between neighbouring authorities) due to calculations for household growth including an element of encouraging people into the Borough to drive economic growth.

New OAN proposal from DCLG include uplift of 32% over ONS demographic forecasts to address affordability. Concern expressed that house pricing is not only driven by supply and demand.
If exceeding demographic demand did bring down house prices, firstly the builders would stop building (as their profits would slump) and secondly every existing house owner would be in negative equity. And we would be back to a sub-prime crash again as in 2007.

Figure of 9,549 dwellings for 2016-2036 equates to 477 dpa, higher than all other alternative scenarios and again a 32% increase over the demographic requirement.

There are new demographic projections since the OAN draft calculation and from ONS due in 2018 which could change those currently being used. The latest 2016-based population projections released by ONS show that by mid-2041, populations are projected to be lower than in the 2014-based projections in all broad age groups with the exception of those in their early 50s to early 70s.

The evidence behind housing requirement, where are the people coming from? Are we housing other people moving from other boroughs? A lot of talk about ageing population and whilst this may be accurate to a degree, to counter this local young families are only supposed to be having 1.2 children, it must balance out somewhere without the need to urbanise every last non protected piece of land in the borough?

The housing requirement should be expressed as a ‘minimum’, with the policy being reworded to include the wording “at least”.

If a 5 percent buffer is applied to the identified housing need figure for the Plan-period (i.e. 9,260) then the supply required would equate to 9,723 dwellings. The supply identified in Table 6 would fall short of this.

Concern that a significant proportion of the housing need is to be delivered through Southleigh strategic site.

Moving base date to 2016 has meant previous shortfall has been ignored.

Housing shortfall should be addressed in the first five years of the plan. Further allocations are needed to ensure housing requirement is delivered in plan period and to give the plan sufficient flexibility.

Concerns that the recent under delivery of housing in the borough may have suppressed household formation for the years that the new household projections will project forward.

The plan presents a housing allocation which at face value looks like a decrease from 11,500 to 9,500, but the baseline has moved from 2016 to 2018 so the Plan is actually an increase over the original plan for the period 2016-2036. The Hayling Island Plan, for example, has risen from 550 to 999.

**Buffer**

Justification for a buffer not acceptable.

Support for buffer.

The Local Plan should ensure that sufficient headroom exists to accommodate future amendments to the methodology in addition to flexibility that will be required in relation to the application of the relevant buffer.

**Housing - General**

Less sensitive sites have been coming forward with higher numbers than in the draft Local Plan. Therefore, more sensitive sites don’t need to be allocated.

The Draft Plan cites several examples of planning permission given for small developments. This is disingenuous and should not be taken as precedent for large neighbouring developments of 50+ houses.

Support for initiative to build on brownfield sites wherever possible.

Number of houses proposed on brownfield seems low compared to greenfield.

The Council should be more proactive and identify derelict or non-performing industrial sites for housing.

Bringing forward a greater number of greenfield sites is likely to facilitate the provision of a wider range of housing types and sizes (in accordance with paragraph 50 of the NPPF and SHMA).

Care should be taken over impact of development on environments/ecosystems.
Most housing allocations are within the 5.6km ‘zone of influence’. Each policy should include reference to Policy E16.

Support of inclusion of L152 in Policy H1, however, they should be excluded from the necessity to provide Site Specific Infrastructure Delivery Statements if they are 5 or more units, or clarification they are all classed as ‘allocated sites’.

Concern that the reliance on previously developed land and other constrained sites has the potential to impede and delay delivery.

The Council have failed to robustly justify the inclusion of a number of sites which are not proposed for allocation (but which are listed within draft Policy H1) within their claimed housing supply.

The plan should be amended to allow the development of additional smaller sites (5-10 dwellings) where housing delivery can be achieved earlier in the 5-year period.

Concern over neighbouring authorities putting lots of development on Havant’s borders despite them having plenty of other land (Winchester and Chichester) and it all becoming a little too joined up - why is pressure not put on these boroughs to resolve their problems rather then soak them into the Havant area?

Number of homes in Emsworth should be substantially lowered. Emsworth will becomes less attractive, dull and an amorphous mass of urban development.

**Policy Wording**

Wording of H1 (c) not clear - relationship between text and table not explained. Status of sites in table not clear.

Policy H1 should refer to the ‘Brownfield Register’, noting that sites listed in the Register are ‘in-principle’ suitable for redevelopment.

It is not clear how the supporting text (para 6.19) relates to draft Policy C2 Protection of Existing Employment Sites. Emerging Policy C2 sets out specific criteria specifying in what circumstances employment land may be redeveloped for alternative uses. Yet paragraph 6.19 simply states that “Land allocated for industrial or commercial use can be used for Starter Homes where this land is underused or unviable for those purposes”. This is a very general statement, which implies that a lower evidential threshold for assessing the acceptability of a proposed change of use, would apply where Starter Homes were proposed. Yet, the Draft Local Plan contains no other Policy references to Starter Homes.

**Windfall**

Inclusion of garden land in windfall assessment is not consistent with national policy and should be removed.

Windfall/unplanned development are putting increased pressure on infrastructure. This is not being managed formally.

Projected windfall figures are incorrect - they should be based on historical data.

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft, with potential wording amendments. In addition, consider whether:

- The housing requirement should be expressed as a minimum
- Further explanation is needed regarding status of sites in the Table in H1
- The Brownfield Register should be referenced
- Reference to starter homes on underused or unviable industrial and commercial sites should be referenced
- Any shortfall or oversupply from 2011 to 2016 should be set out, although this may be better expressed in the SHLAA

Comments where no change considered necessary:
The draft HBLP2036 makes provision for sufficient housing sites to meet the identified need.

The Council will continue to work with other authorities within the Portsmouth Housing Market Area under the Duty to Cooperate with regard to any unmet housing need.

By the time the HBLP2036 reaches submission stage the Government’s standard methodology will most likely be finalised and will be able to be given full weight. This will be reviewed as the plan progresses.

Paragraphs 6.3 to 6.5 explain how the housing target was derived.

The total housing need is based on the Government’s draft standard methodology.

The Government’s standard methodology for calculating housing need means that the approach to determining housing targets is consistent across the country. Therefore, it is considered that the figures included in the PUSH SHMA and Spatial Position Statement are no longer the most up to date and referenced in the Local Plan only for background information.

Concerns regarding the Government’s methodology are beyond the remit of the HBLP2036.

ONS projections of household growth should be the demographic baseline for every local authority area form the baseline for the Government’s methodology for calculating housing need. The consultation document indicates that the most recent official projections should be used.

The 9,549 figure includes a buffer which is required by the NPPF to allow sufficient flexibility to adapt to rapid change.

There is no requirement to apply specifically a 5% buffer to the housing need figure.

Whilst Southleigh provides a significant proportion of our identified housing supply, the HBLP2036 includes a range of site types and sizes to ensure housing delivery in both the short and long term.

The 11,250 figure represents the total Objectively Assessed Housing Need (OAN) between 2011 and 2036 that was identified in the SHMA. This was superseded by the Government’s proposed standard methodology for calculating housing need. The new methodology shows there is an annual requirement of 463 net new homes in the Borough from 2016. This gives a total need figure of 9,260 from 2016 to 2036 (the plan period). The base date of the Local Plan is 2016 and has not moved to 2018. The 9,549 figure is the number of homes the plan will deliver to meet the need of 9,260 with a buffer to allow for flexibility (this is a requirement of the NPPF).

All sites that have been assessed as being suitable for development were included as allocations in the Draft HBLP2036.

Whilst some sites have already come forward with higher numbers than in the plan, some have come forward with less. Achieving a greater number of dwellings of some sites does not justify the removal of other more sensitive sites as the housing need is a minimum plus we are required to have a buffer to allow for sufficient flexibility to adapt to rapid change.

Existing planning permissions do not set a precedent for large neighbouring developments. Each site is assessed on its individual merits through the Strategic Housing Land Availability Assessment (SHLAA) and the Sustainability Appraisal (SA).

Sites are required to be available for development in order for us to allocate them. In addition, it is important to protect employment sites to secure jobs in the area as well as meeting our housing need.

The Council has sought to maximise the potential of previously developed land or brownfield sites.

The plan includes polices relating to environmental protection.

The plan is designed to be read as a whole so it not considered necessary to reference E16 in every allocation.

Whilst there are a number of brownfield sites allocated that tend to be more constrained, there are also a number of greenfield sites. It is considered that this mix will ensure continued housing delivery in the Borough.

Sites listed in Policy H1 are allocations on brownfield sites which are free from site specific constraints. They carry the same weight as sites with specific allocations. Therefore, it is correct that these are included in our housing supply figures.

The plan includes a mixture of site sizes. Efforts have been made to allocate sites of 5-10 dwellings, however, it is dependent on what sites are available.

Surrounding authorities are in the same position in terms of having to meet their housing need.
• Since the draft Local Plan was published the Government has proposed changes to the NPPF regarding starter homes. The plan will be updated to reflect this once the NPPF has been finalised.
• The NPPF is not supportive of the inclusion of garden land as windfall development but the Council believe there is clear evidence and policy support that supply from this source will continue.
• Windfall sites are under the same obligations as allocated sites in that they must pay CIL which feeds into infrastructure delivery. Housing completions, including windfall sites, are continually monitored and reviewed in terms of housing supply.
• The windfall allowance has been calculated based on an analysis of previous windfall/unidentified residential development in the five areas of Havant Borough from 2006/07 to 2016/2017.
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
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<tbody>
<tr>
<td>30% would see a reduction in current affordability levels which are set at 30-40% of new developments (Policy CS9). HCC would welcome retention of 30-40% of new developments for affordable homes. Would value an increase on 20% rented and intermediate housing provided in the town centres to ensure that those living in affordable housing have good access to local amenities and work opportunities.</td>
</tr>
<tr>
<td>Concerns that affordable housing is not being provided / affordable housing requirement is negotiated away by the developer.</td>
</tr>
<tr>
<td>Subsidising new housing and disguising the subsidy by calling it “affordable housing” does little more than maintain the very high prices in the South East for unsubsidised new building.</td>
</tr>
<tr>
<td>Provision of social housing will not be adequate and local families will be reliant on private sector rented housing.</td>
</tr>
<tr>
<td>Concern that the commuted sum towards the provision of offsite affordable housing (when providing social housing on site is not viable) is too low.</td>
</tr>
<tr>
<td>Making a payment to the Council for affordable housing will be no use to Emsworth as there will be no further space to build.</td>
</tr>
<tr>
<td>Products are not affordable - plan should secure affordable houses which are truly affordable for local people.</td>
</tr>
<tr>
<td>Concern that the price of new homes is almost 11 times more than the average annual income, so many local residents excluded from living in the town in which they were raised. Help to Buy and similar schemes help some people to get onto the property ladder but also push up prices.</td>
</tr>
<tr>
<td>Those on the Hampshire Homes Register and in temporary accommodation are unlikely to benefit from the homes envisaged in the Draft Local Plan (DLP). It is not clear how many of the new homes will be affordable to rent (or buy). In any event developers have the option of buying their way out of affordable provision. The rentals sector has been left mainly to private landlords where rents are up to twice the cost of buying a home and often exceed the limit of housing benefit.</td>
</tr>
<tr>
<td>The term ”affordable housing” is frequently used when justifying a proposal, but the definition of that word is too ambiguous and widely abused. The mass housing market is the creation of volume house builders, who generally seek easy schemes on greenfield sites to maximise profit with the minimum of effort. This emphasis is misguided and should be resisted.</td>
</tr>
<tr>
<td>Provision of affordable housing in the Borough is led by market housing through HBC’s percentage requirement for affordable housing delivery on sites. HBC do not build and manage new affordable housing stock and as a result the Borough publish high demands for general housing growth to meet the affordable housing needs artificially pushing proposed allocation numbers up and exposing unsuitable areas to development.</td>
</tr>
<tr>
<td>The tenure split should be flexible rather than a 70/30 split - changes recommended to ensure consistency with national policy.</td>
</tr>
<tr>
<td>The standard split of 70% affordable rent and 30% intermediate is outdated and no longer supported by Registered Social Landowners. Amendment required to reflect the allowance for discounted market housing and shift towards provision of Starter Homes to provide balanced mixed communities. Tenure split should be on a site by site basis rather than default 70/30 split.</td>
</tr>
<tr>
<td>Concern that an off-site financial contribution may be accepted in lieu of on-site provision.</td>
</tr>
<tr>
<td>Support for off-site affordable housing contribution on constrained sites.</td>
</tr>
<tr>
<td>The policy does not provide for the delivery of Starter Homes.</td>
</tr>
<tr>
<td>Viability should be determined on a case by case basis.</td>
</tr>
</tbody>
</table>
Overemphasis on the principle of development viability and concerns over willingness to accept reduced affordable housing requirement

The policy should provide flexibility to enable the Council to consider a reduced level of provision where development is unviable.

Reference to ‘open-book’ assessment should be included within the body of the policy - clarification on what is needed should be included within the supporting text.

40% affordable housing target should apply in the Emsworth Neighbourhood Plan area.

A lower threshold than 11 dwellings should be set.

A suggestion that the Stamp Duty holiday should be extended to shared ownership properties.

A suggestion to reduce CIL or planning fees for affordable homes as an incentive to developers.

Social housing should be kept separate from market housing - concerns over litter and vandalism.

A more realistic affordable housing target (10%) should be set for retirement housing.

Support for an affordable rent to buy model.

Suggestion for self-build plots on larger developments to enable skilled trades’ people who are unable to buy their own homes but have the skills to build one.

In order for the plan to be sound, as considered against the tests of soundness set out in paragraph 182 of the NPPF, the Council should ensure the following actions are taken: That the affordable housing requirement in lower value areas be reduced to reflect the viability evidence.

HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider how the policy may be amended to include the following criteria:

- Set out the Council’s approach to the consideration of a reduced affordable housing requirement on viability grounds
- Clarify how affordable home ownership products including Starter Homes will be considered, having regard to the Revised NPPF consultation proposals
- An additional criterion to cover a reduced affordable housing requirement for retirement/sheltered housing, informed by the findings of the Local Plan and CIL Viability Study

Affordable housing is currently defined as in Annex 2 of the National Planning Policy Framework. The policy and supporting text will need to be revisited pending forthcoming changes to national guidance.

Comments where no change is considered necessary:

Though the Core Strategy policy (CS9) currently identifies a range of 30-40%, the council is only able to secure 30% affordable housing on the vast majority of developments, but viability will vary with site-specific circumstances. This is reflected in the findings of the Local Plan and CIL Viability Study which indicates the majority of developments would be able to support a 20% affordable housing requirement in Havant, Waterlooville and Leigh Park town centres, and a 30% affordable housing requirement outside of the town centres.

Paragraph 6.31 of the supporting text confirms that there is a very strong presumption that affordable housing will be provided by the developer on the development site. Only in exceptional circumstances where justified by robust viability evidence, the Council will consider accepting a financial contribution in lieu of on-site provision. It is considered that this approach will make sure that wherever possible affordable housing is provided on site, whilst providing for an appropriate degree of flexibility where this is not practicable. Criteria c of the policy indicates that the tenure of affordable housing is split 70% rented and 30% intermediate (shared ownership), and that the appropriate split will be negotiated on a site by site basis.
based upon the latest evidence of locally identified needs. The Council considers this to be an appropriate tenure split based on the advice and guidance from Registered Providers.

Affordable housing will be primarily secured through market housing-led schemes. As drafted, it is considered that the policy provides a more clear and robust framework for securing affordable housing provision that is currently provided through the Core Strategy (2011). The policy approach has been informed by feedback received from Members’ at Local Plan Panel and the Members’ Local Plan workshop meetings. Any changes proposing additional flexibility will be considered with that approach in mind.

The Draft Local Plan has been informed by the Government’s proposed methodology for calculating housing need takes affordability into account. The Council has considered sites across the borough for allocation to meet the Borough’s housing need. The suitability of site allocations has been considered through the Council’s SHLAA and Sustainability Appraisal.

Paragraph 6.26 confirms the affordable housing requirement is a minimum. As drafted, the Plan affords sufficient flexibility to enable the Emsworth Neighbourhood Plan to set an increased affordable housing requirement in broad conformity with the Local Plan.

Under national policy, the Council is not able to require affordable housing on sites of less than 11 dwellings.

The interaction between affordable housing provision and CIL is considered through the Local Plan and CIL Viability Study.

The even distribution and integration of affordable housing across the development in line with Policy E6 is an appropriate approach, and a key principle in securing sustainable communities.

Stamp Duty and planning fees are not matters for the Local Plan to consider.
Summary of key comments raised by residents and other stakeholders

Support of policy.

Smaller properties are more affordable and should be encouraged, particularly on larger strategic sites.

Quality smaller homes are needed to meet downsizing requirements.

A larger amount of flexibility should be considered for housing mix to reflect specific requirements relevant to an individual application.

The housing mix should not be applied to every site but rather reconstituted as an overarching target, to be achieved on average, and on an on-going (Borough-wide) basis. Over provision for 2 bed properties in high density town centre dwellings should be reflected by a lower need for 2 bedroom dwellings in lower density schemes.

Concern that an overprovision of smaller units over the plan period may occur.

The private mix of housing should be market led. Developers will build a mix of housing that is most in demand for that area.

Building large detached and semi-detached homes does not meet the local housing need. Housing development should be suitable for people who need them such as key workers, public services staff, OAP’s. Building larger homes should only be allowed once those needs are met.

Housing should meet all needs including those for 5 and 6-bedroom houses.

The ratio of “starter” and smaller homes is too low.

The density of development requirement is too prescriptive. The density of a scheme should be based on a holistic and well evidenced understanding of the capacity of the site.

The density of sites does not account for site constraints or viability considerations.

35% of the housing mix being two bedroom homes is not justified and no evidence has been produced to support this policy.

The development densities of sites proposed in countryside locations are excessive and in no way represent the locality.

HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to increase the flexibility of the criteria based on site specific circumstances.

Comments where no change is considered necessary:

Affordable home products are dealt with in Policy H2.

Smaller homes (as measured by bedroom size) are already encouraged within the policy and are considered appropriate.

The proposed housing mix for development sites is underpinned by comprehensive evidence contained in the Council’s “Specialist Housing Analysis”. The proposed mix would not result in an overprovision of smaller properties when viewed over the plan period and in line with the projected changes in demographics.

The need for a specific housing mix has been considered with reference to relevant data. It is considered that the housing mix proposed by developers would represent property types that would generate the most profit. This may not be the same as the housing mix required to create a sustainable housing mix.
The density of proposed allocation reflects the desire of the Council to meet its housing need by ensuring the most efficient use of land to meet housing need. By making the most efficient use of land less development will be required in countryside areas.
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comments</th>
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<tbody>
<tr>
<td>It should be made clear that “it is not intended that new provision should be limited to the sites identified in the Local Plan”.</td>
</tr>
<tr>
<td>The Government have made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.</td>
</tr>
<tr>
<td>Annexes could be an innovative solution initially used for the younger family members needing a home and later for the older occupants as they downsize and would benefit from the younger family at hand to provide care. There is a shortage of this type of accommodation.</td>
</tr>
<tr>
<td>“Extra care housing in itself can include sheltered housing, care homes and nursing homes”. HBRA feels that statement above in the draft Plan is not correct. Extra- care is housing that also provides personal care sometimes round the clock care. Sheltered is the older model of housing with an alarm system and a manager who may live on site but more often visits the scheme on a daily basis. Personal care is not provided by the scheme but can be purchased from a care provider.</td>
</tr>
<tr>
<td>As currently proposed, part (c) of this policy is unclear, and further clarification of what constitutes ‘a locally identified need’ would be beneficial. The provision of this type of housing should be to meet the needs of the Borough as whole and should not be restricted to a local area.</td>
</tr>
<tr>
<td>There should be a specific requirement for a developer to provide extra care housing for any development with over a specific number of units. This will enable mixed communities to be created in which older people can participate and be looked after.</td>
</tr>
<tr>
<td>There is no reference to the evidence base that supports the policy. The evidence base should account for current or future numbers of disabled people, their likely age breakdowns, housing needs and other vital demographic factors such as the predicted need for the provision of institutional style accommodation, extra-care housing, residential or nursing homes.</td>
</tr>
<tr>
<td>We would suggest that the second criterion should be amended as follows; “The location is appropriate, taking into account the accessibility of facilities, services and public transport, and the needs of older people” This adjustment would ensure that the policy can respond more precisely to proposals for ‘extra care’ developments, which often provide a wide-range of facilities (well in excess of those provided by traditional retirement-living schemes).</td>
</tr>
<tr>
<td>The language and understanding is very dated, not to mention quite insulting as it uses the very outdated medical model of disability rather than the prevailing social model.</td>
</tr>
<tr>
<td>The policy is discriminatory.</td>
</tr>
<tr>
<td>It is suggested that HBC invests, together with the NHS and HCC Social Services in care and nursing homes for the increasing, and increasingly ageing, population. Throughout the borough. Do not rely on the private sector.</td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- The policy should provide further clarity that new provision of housing for older people is not limited to sites identified in the local plan
- Sheltered housing should be considered as ‘extra-care’ housing
- Suggested wording amendments regarding definitions are appropriate
• The policy relating to annexes should be adjusted to support development of this type of accommodation for younger people

Comments where no changes are considered necessary:

It is considered that the policy addresses the housing requirements of groups with specific needs in combination with other policies within the draft plan.

It is considered that part c of the policy is sufficiently clear. Where there is a need for specialist housing in a local area planning permission will be supported where all other relevant policy requirements are also satisfied.

In order to ensure that there is not an over-provision of housing for older people in any specific area, it is considered that requiring extra care housing on any site over a certain threshold is not appropriate.

Havant Borough Council, along with other organisations such as the NHS and Hampshire County Council work together to provide care and nursing provisions for the ageing population. The policy does not restrict any form of non-private care provision.
**H5 - Gypsies, Travellers and Travelling Showpeople**

3 responses were received regarding this topic

### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
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<tbody>
<tr>
<td>Policy of meeting identified need is welcomed.</td>
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<tr>
<td>Unmet need in neighbouring authorities should be acknowledged as an 'identified need' within the terms of policy H5, allowing a permissive approach to be taken towards any sites that may come forward and which meet the requirements of policy H5.</td>
<td></td>
</tr>
<tr>
<td>Paragraph 10 of Planning Policy for Traveller Sites sets out national guidance and requires that criteria based policies should be set to guide decisions &quot;where there is no identified need.&quot; Thus the first criterion to policy H5 which requires a need to be established before favourable consideration can be given to a Traveller site is unacceptable in its present form. Either the first criterion should be removed, or a separate policy should be added to deal with the criteria to be applied where no overriding need exists.</td>
<td></td>
</tr>
<tr>
<td>Concern that Policy H5 is unsound.</td>
<td></td>
</tr>
<tr>
<td>Policy fails to meet requirements of the NPPF and Planning Policy for Traveller Sites.</td>
<td></td>
</tr>
<tr>
<td>No site is identified and therefore the draft Local Plan 2036 fails to meet the requirement to identify land to meet the need in the first five years.</td>
<td></td>
</tr>
<tr>
<td>Other policies within the draft Local Plan 2036 such as E10 (Landscape and Townscape) should be applied in the selection of a site for allocation.</td>
<td></td>
</tr>
<tr>
<td>Existing unauthorised site would fail to meet the test of soundness as it is not consistent with Government policy.</td>
<td></td>
</tr>
<tr>
<td>Requirement for local connection in Para 6.57 is contrary to the Government’s Planning Policy on Traveller Sites (paragraphs 11 and 24[e]) and conflict with the Duty to Cooperate by preventing traveller needs from being met where they cannot be accommodated an adjoining authority.</td>
<td></td>
</tr>
<tr>
<td>We would welcome an additional criterion in Policy H5 requiring development to accommodate gypsies, travellers and travelling showpeople not to have any adverse effects on the significance of heritage assets, as part of the positive strategy for the conservation and enjoyment of, and a clear strategy for enhancing, the historic environment as required by the NPPF.</td>
<td></td>
</tr>
<tr>
<td><strong>HBCs proposed way forward for Regulation 19 HBLP2036</strong></td>
<td></td>
</tr>
<tr>
<td>The policy will need substantial revision for the Regulation 19 HBLP2036. Permission for a single pitch on Long Copse lane was granted on appeal (APP/X1735/W/3156978). This will need to be reflected in the policy in the Regulation 19 HBLP2036. Unmet need from neighbouring authorities needs to be considered further as well as compliance with national policy.</td>
<td></td>
</tr>
<tr>
<td>Comments where no changes are considered necessary:</td>
<td></td>
</tr>
<tr>
<td>- It is not considered necessary to reference the historic environment in the policy, unless any allocation could directly impact on a specific heritage asset.</td>
<td></td>
</tr>
</tbody>
</table>
### Summary of key comments raised by residents and other stakeholders

**Objections to the site being developed for housing and requests to remove the site from the HBLP 2036.**

- There are sequentially preferable sites which should be allocated for development to meet housing need instead of H6.
- The other sites proposed in Emsworth are considered to have a greater capacity for housing delivery than indicated in the plan. The removal of H6 would not impact on the proposed housing numbers if the densities of other sites were increased.

**Representations regarding discounted SHLAA sites in Emsworth can be found in the summary table entitled “Evidence Base - SHLAA”**.

- Redlands Grange has not been shown on the map.
- Request that affordable housing is provided on site.
- Suggestion to lower the site capacity to 10 dwellings.
- Suggestion that the proposed number of homes is reallocated to Southleigh (KS5).
- Suggestion that the development is coordinated and phased/staggered.
- Suggestion that the development is off set from Long Copse Lane via open areas for paths and drainage.
- It is strongly recommended that a prospective developer undertakes a minerals assessment and contact a local minerals operator to allow for mineral related opportunities to be fully explored with HCC.

**Support for the site being developed for housing.**

- The principle of agreeing an overall master plan is accepted by the landowners; the suggestion that development will come forward in phases is also welcomed.

- An initial master plan demonstrates that 260 dwellings can be accommodated within a design concept that is based on ecological buffers and swathes of open space running through the site.

- The site naturally falls into two zones; west and east of the track leading to the Old Dairy Farm. While it would be appropriate to work within a master plan for the whole allocation so that it is planned comprehensively, there is no reason that these two sections cannot come forward under separate planning application phases. They have separate access points and can be developed separately under an approved master plan concept.

- Additional land to the north-west of the site has become available that will enable a more comprehensive scheme; no additional dwelling numbers are proposed, instead it will improve the overall scope for landscape buffering and open space provision. It is requested that the site area is adjusted accordingly (plans submitted).

### LOCAL GAPS & LANDSCAPE:

- Development will transform one of the most rural and beautiful areas into one of the most highly developed; therefore, altering the character of the area.

- The site is outside of the urban area (Policies AL2 and CS17 of the Adopted Local Plan) forming a strategic green gap; development will lead to urban sprawl and set a precedent for further development in the area.

- The promotion of sites in unsustainable countryside locations whitewashes existing Local Plan policies to safeguard and enjoy the countryside.

- The proposed density does not represent the countryside/semi-rural location.

- The site is in a semi-rural area, effectively in the countryside and, in accordance with the NPPF, ‘‘conserving and enhancing the natural environment”, development should not take place.
The site forms part of the local gap between Emsworth and Westbourne, as well as a buffer to the South Downs National Park.

The site forms part of Landscape Character Area 21 (Southleigh Forest) in the Landscape Character Assessment Sensitivity Report 2007, more specifically, sub-areas 21.3 and 21.4:

- **21.3 (Hollybank Woods)** has a Low Capacity for development because of high landscape sensitivity; development would have a negative impact on landscape/visual and settlement characteristics.
- **21.4 (West and South of Hollybank Woods)** has a Medium/Low Capacity for development as development would encroach on the river valley landscape, have a negative impact on visual characteristics.

Development would conflict with Policies E2 (Green Infrastructure) and E10 (Landscape and Townscape).

**HERITAGE:**

The site is adjacent to Redlands Lane which forms part of the Ancient Sussex Border Path.

The site is in the setting of the Grade II Listed Hollybank House; development would conflict with Policy E9 and Paragraph 133 of the NPPF.

The agent has stated that the setting of the listed buildings on adjacent land will be protected through the appropriate arrangement of buildings, open space and landscaping.

**BIODIVERSITY & OPEN SPACE:**

This is a highly constrained greenfield site consisting of countryside, trees, hedgerows and close to ancient woodland. Development would result in the loss of open spaces, natural habitats, access to the countryside and would also prevent the ability of the natural environment to mitigate against pollution.

Concern over the impact of noise and air pollution on biodiversity.

The agent has stated that the adjacent woodland will be protected by an appropriate buffer and that the TPOs will be incorporated into the layout of the site.

The site is covered by many Tree Preservation Orders (TPOs).

The agent has stated that the trees (which do not have TPOs) and hedgerows within the site will be retained for the most part.

There are high quality hedgerows on and surrounding the site.

The agent has stated that:

- The species' existence, along with the requirements of buffers and bat corridors, around the site is recognised
- The wooded copse will be retained as habitat to support the maternity roost; new woodland and foraging areas are proposed to connect the bat areas

A Bechstein’s bat maternity roost is within the vicinity of the site; there is little evidence of successful mitigation, as such, the development would conflict with proposed policy E19 (Protected Species).

Recommendation that detailed surveys are carried out to ascertain the status of Bechstein's bat in the area.

There is potential for badgers, dormice, birds and reptiles to be on or immediately surrounding the site.

Hollybank Wood is a SINC and should be protected.

Support for the additional parcels of land since the site identification in the Local Plan Housing Statement; this will help provide greater scope for green infrastructure, especially the proposed primary bat corridor down the eastern edge.

Positive comments regarding the open space provided on the Redlands Grange development.

It is requested that the site is made into a community green space.
The landowners of former site UE39 (now encompassed within H6) state that Policy E2 would not apply to their parcel of land as they could only accommodate 25 dwellings.

**SURFACE WATER FLOODING & DRAINAGE:**

Concern that Water Authorities do not tend to adopt Sustainable Urban Drainage Systems (SuDS).

Concern development would create greater flooding problems in the area and downstream.

Concern development would affect water quality.

There are known surface water drainage and groundwater flooding issues in the area, including along:

- Long Copse Lane (comments that surface water flooding has increased since the Redlands Grange development was built);
- Redlands Grange (despite incorporation of SuDS), and;
- Oak Tree Drive.

The main sewer feeds into a junction by the garages along Long Copse Lane (Culvert No 7752).

Suggestion for a surface water runoff and sewer plan, along with a new sewer connection with an east-to-west flow and the capturing of rainfall onsite.

The policy requirement to reduce surface water runoff is supported. It is suggested that managing flood risk at its source (i.e. on site) is the most appropriate risk management technique and that contributing to a flood alleviation scheme should be supplementary rather than an alternative.

The site is in Flood Zone 1; the agent has stated that the master plan will be informed by a surface water drainage strategy that incorporates SuDS at the lower parts of the site and connects to the surrounding drains at greenfield discharge rates.

**INFRASTRUCTURE:**

The policy does not include early years or related infrastructure.

The hospital and local schools are at full capacity and are unable to handle the estimated number of people from sites H6 and H14.

There is a lack of suitable and sustainable infrastructure to support the level of development.

The site is relatively isolated:

- The nearest community infrastructure is in Westbourne.
- The nearest bus stop is a 15-minute walk away.
- The above will lead to greater car usage.

The proposed convenience store is:

- Not realistic, justified or viable as local provision is more than adequate.
- The existing retail hierarchy is mature; quantum spend and catchment analysis does not warrant additional retail development.
- Would impact on the area due to delivery lorries.

Objection to the criterion regarding a new convenience store and request for its removal from the policy.

**ACCESS, TRAFFIC & ROAD SAFETY:**

Comments that access to the site is dangerous as the narrow, right-angled, blind bend from Hollybank Lane to Long Copse Lane, as well as Long Copse Lane being a single-track country road, is used by walkers (including school children), cyclists and equestrians.

The site’s proximity to Redlands Lane will also create dangers for drivers, walkers and cyclists using this route.

Construction vehicles were stuck at the top of Hollybank Lane during the Oak Tree Drive development.

Improvements to the right-angle bend will require third party land.
Suggestion for an off-road access to Hollybank Woods for walkers, cyclists and equestrians to be provided.

Suggestion for a roundabout where Long Copse Lane and Wraysbury Park Road meet.

Support for road widening providing that drainage ditches are included within the site.

Objection to road widening as;
- Residents along Long Copse Lane could lose part of their driveways; reducing ability to park off-road;
- This would destroy trees and hedgerows (this conflicts with Policy E15), and;
- This would alter the character of the lane.

The junction layout of Long Copse Lane with North Street (Westbourne) falls short of the requisite highway standards.

Highway infrastructure to support development of the scale proposed would require highway corridors of a minimum 5.5m carriageway with a minimum 1.8m footway to at least one kerb line; this is not achievable.

There are no suitable and realistic means of controlling traffic movements to mitigate any highway safety risks; this would bring complications in providing appropriate turning areas and associated traffic movements.

The agent has stated that a sensitive scheme can be achieved for widening of Long Copse Lane in places that protects the existing character.

Local roads (especially Long Copse Lane) would not be able to cope with the additional traffic generated from this development during and after construction.

It is requested that an overflow car park for residents is created during the construction phase.

The agent has stated that access is proposed from Long Copse Lane and will utilise two vehicular accesses.

**RIGHTS OF WAY NETWORK:**

Suggestions of pedestrian paths and nature trails being incorporated into the site.

It is requested that the development provides a multi-user link to Havant BOAT 66a, a multi-user route across the site, along with a pedestrian link/crossing from the site to Havant Footpath 67 (southern side of Long Copse Lane).

It is requested that a developer contribution is paid to HCC towards enhancing the local rights of way network.

**HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to include:

- An amendment to the site boundary to incorporate the newly submitted parcel of land to provide greater provisions of open space and landscape buffering
- A requirement that a multi-user route across the site is provided which connects with Havant BOAT 66a and Havant Footpath 67
- A requirement that a contribution is paid towards the enhancing the local rights of way network in line with HCC’s request
- An additional point in the site opportunities and constraints that road widening, in places, may be subject to third party arrangements
- An additional point in the site opportunities and constraints that the site is within a sensitive landscape location as outlined by the Landscape Capacity Study (May 2015)
• The deletion of criterion f) (convenience store)
• An amendment to criterion j) to state that development provides a drainage solution onsite and that a contribution is supplementary rather than an alternative
• Amendments to the policy following the completion of the SFRA Phase II

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

• Green Infrastructure (E2)
• High Quality Design (E6)
• High Quality New Homes (E7)
• Historic Environment and Heritage Assets (E9)
• Managing Flood Risk in New Development (E12)
• Drainage Infrastructure in New Development (E13) including a requirement for development to connect to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water
• Ecological Conservation (E15) regarding trees, hedgerows and SINCs
• Protected Species (E18) regarding Bechstein’s bat
• Affordable Housing (H2)
• Housing Density and Mix (H3)

Comments where no change is considered necessary:

General:

• **Density and other sites in Emsworth** - A consistent methodology has been used to calculate the potential site capacity for each site proposed for development in the Draft HBLP 2036. This has taken into consideration the constraints and setting of specific sites where appropriate. For this site, a relatively large proportion of the land will be needed for open space and mitigation for Bechstein’s bat.

• **Coordination of development** - The site could be brought forward in phases, providing that a master plan was granted outline permission, as explained in paragraph 6.61.

• **Minerals** - The site’s location in the Mineral Safeguarding Area (MSA) has been highlighted in the site opportunities and constraints and a requirement has been included (criterion h) which states that opportunities for prior extraction are explored with Hampshire County Council (Lead Minerals Authority).

Local Gaps and Landscape:

The PUSH Spatial Position Statement supports strategic countryside gaps, but it is not considered that any gaps of ‘sub-regional significance’, nor of ‘fundamental local importance’ exist in the Borough, which would outweigh the need for housing. It is acknowledged that undeveloped gaps were protected by policies in the adopted Local Plan. However, in the new HBLP2036 it is no longer possible to continue this protection, as there are not enough brownfield sites and sites within the existing urban area to meet the Borough’s housing need. Therefore, greenfield sites outside of the existing urban area have had to be considered for development. With this, proposed Policy E10, aims to prevent the coalescence of distinct settlements where possible.

The Havant Landscape Capacity Study (May 2015) has been used, along with all other evidence available and submitted, to assess whether the site should be allocated. It is acknowledged that H6 is located within areas which were assessed as having low and/or medium capacity to accept change in the Landscape Study and that the study recommends that parcels 21.3 and 21.4 are not taken forward for potential growth. The findings of the landscape study are one consideration of many in the planning balance as to whether
development should be supported. The Council considers that development may be deemed acceptable where mitigation could be provided for the identified impacts on landscape character.

Heritage:

The site’s proximity to Hollybank House and Redlands Lane (Ancient Sussex Border Path) has been highlighted in the site opportunities and constraints; a requirement to preserve and, where possible, enhance the character and setting of the former is specified under criterion kb) of the proposed allocation policy. In addition, any future application would have to demonstrate how it would meet the requirements of proposed Policy E9 (Historic Environment and Heritage Assets).

Biodiversity & Open Space:

The existence of Bechstein’s bat, and other documented species above, has been highlighted in the site opportunities and constraints. The proposed policy outlines a requirement that any future proposal must include appropriate mitigation measures, including buffers, in line with proposed Policy E18 (Protected Species). In addition to this, the protected trees and high-quality hedgerows have been highlighted in the site opportunities and constraints along with design and layout requirements to retain and integrate them into any future scheme (criteria kc and kd).

Comments that proposed Policy E2 (Green Infrastructure) would not apply to smaller sections of H6 are not supported by the Council. It is important to stress that the Council no longer views H6 as a combination of separate landownerships but as one comprehensive site. The Council has made it clear that a comprehensive master plan of the whole site (H6) is essential to consider the site’s constraints, context and landscape character. As such, an outline application would need to be approved for the whole site (H6), which includes adequate open space provision, so that phased development can come forward in accordance with the master plan in the form of reserved matters applications.

Regarding the fact that H6 is a greenfield site, the Council has considered sites across the Borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations. The Council cannot designate the site as a local/community green space as it is an extensive tract of land (please see paragraph 77 of the NPPF). However, the established network of natural habitats in the Borough will be outlined as part of the review on the Havant Borough Biodiversity Action Plan (BAP); this will be available in due course and will inform the proposed site allocations for the Pre-Submission Local Plan 2036.

Infrastructure:

The current and future capacity of local schools, health facilities, public transport and early years infrastructure have been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP).

Access, Traffic and Road Safety:

The construction impact of the development will be managed, as far as is possible within the limits of regulations.

The Borough-wide Transport Assessment (TA) is currently underway and will be available in due course. The TA will assess the impacts of all development proposed in the Draft HBLP 2036 on the highways network and establish what mitigations measures are needed. In addition, the proposed allocation policy states that an applicant will need to supply a Transport Assessment and Travel Plan for the site to support any future planning application. The Council will work with Hampshire County Council (as lead Highway Authority) to assess the impact road widening and the development (as a whole) on factors such as; the landscape, road safety and existing resident amenity. This will be dealt with at the application stage when greater details are known about road and pavement widths etc.
Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Object to the infilling of an important green gap which separates Emsworth from Havant and contributes to the rural setting of the AONB.</td>
</tr>
<tr>
<td>Object to revised planning application currently being considered (including objection to reduction in number of dwellings compared to the 2017 resolution to grant permission).</td>
</tr>
<tr>
<td>In combination with proposals for Southleigh (KS5), development here will deprive the area of Green Space.</td>
</tr>
<tr>
<td>Public transport services are limited.</td>
</tr>
<tr>
<td>Support the allocation.</td>
</tr>
<tr>
<td>Concern about increase in traffic and parking in surrounding roads.</td>
</tr>
<tr>
<td>Concern about surface water drainage; roads already flood.</td>
</tr>
<tr>
<td>Proposal will affect well being and quality of life of existing residents.</td>
</tr>
<tr>
<td>There is a permissive route from Havant Road down to Havant Footpath 56, which is part of Wayfarers Way / Solent Way. A Definitive Map Modification Order (DMMO) claim has been placed on this route and is awaiting investigation. Should development come forward on this site, HCC request that a developer contribution be provided towards surfacing this route, should it be made into a right of way.</td>
</tr>
</tbody>
</table>

HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. There is resolution to grant planning permission, demonstrating that development of this site is deemed acceptable by the Local Planning Authority. Proceed with policy as proposed in the regulation 18 draft, or remove policy of development commenced in the meantime. If scheme does not proceed to implementation, review the need to make any amendments to the policy.

A number of respondents consider that the developer should not be allowed to revise a scheme already subject to a resolution to grant planning permission. This view is noted, but the council is obliged to consider amendments to schemes before permission is granted or new applications on land already subject to planning permission.
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Support for the continued allocation of the site for 53 dwellings.</td>
</tr>
<tr>
<td>It is the intention of the developer to submit an application and commence development of the site before the HBLP 2036 is anticipated for adoption.</td>
</tr>
<tr>
<td>Criterion a) is considered appropriate.</td>
</tr>
<tr>
<td>Criterion b) should be deleted as Hampshire County Council (HCC) raised no objections to the previous application (APP/14/00360) which stated that due to the site’s limited size prior extraction of the underlying mineral resource would not be viable.</td>
</tr>
<tr>
<td>Criterion c) requires clarification as to whether the contribution towards a flood alleviation scheme will be secured via the Community Infrastructure Levy (CIL).</td>
</tr>
<tr>
<td>Criterion eb) should be deleted as on-site allotments in addition to private and other public open space would exceed the relevant standard.</td>
</tr>
<tr>
<td>Criterion ec) is dependent on securing third party land outside of the applicant’s control. Suggestion that the requirement is amended to provide a safe pedestrian and cycle link to the boundary of land under the applicant’s control.</td>
</tr>
<tr>
<td>The outline planning permission (APP/14/00360) has now expired and although a rearrangement of the parking layout was approved in August 2016 (APP/16/00496), no further activities have been progressed to suggest that the site is likely to come forward quickly.</td>
</tr>
<tr>
<td>No early years or related infrastructure has been included.</td>
</tr>
<tr>
<td>Suggestion that Havant Footpath 71 (adjacent to eastern boundary) is upgraded to a multi-user route with a similar connection between the footpath and Southleigh (KS5).</td>
</tr>
<tr>
<td>The policy requirement to reduce surface water runoff is supported. It is suggested that managing flood risk at its source (i.e. on site) is the most appropriate risk management technique and that contributing to a flood alleviation scheme should be supplementary rather than an alternative.</td>
</tr>
<tr>
<td>Given the proportion of the site that is at risk of flooding, the consideration of climate change impacts should be fully assessed. Proposed development should be accommodated without locating buildings, structures or drainage infrastructure within areas at risk of flooding.</td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to include:

- An amendment to criterion c) to state that development provides a drainage solution onsite and that a contribution is supplementary rather than an alternative
- Amendments to the policy following the completion of the SFRA Phase II
- A design and layout requirement to upgrade the existing Havant Footpath 71 to a multi-user route and provide a multi-user link from the footpath to Southleigh (KS5) (either by the developer or via a developer contribution)
- That criterion ec) (right of way linking to the service station) is subject to third party arrangements

Further investigation is also required to ascertain whether HCC would agree with the suggestion to remove criterion b) (mineral extraction).
• Any flood alleviation contribution would be secured through a S106 agreement.
• In line with Policy E2 and E19, community food growing provisions would need to be provided as part of the public open space provision rather than in addition to it. Therefore, criterion eb) does not exceed the relevant standard.
• The capacity and future growth of early years infrastructure has been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP).
Summary of key comments raised by residents and other stakeholders

**Principle of development**

Support for the principle of development and identification of the site as both ‘deliverable’ and ‘developable’.

The Draft Local Plan proposes more housing than is needed. This site should be rejected.

Together with other nearby recent and proposed developments, it’ll be too much.

Emsworth has made a significant contribution to housing provision in the Borough already.

This amount of homes would not make a dent in the housing target

This development would not be affordable.

The site is protected green land that is nor earmarked for development in the Government’s current proposals.

Why can’t the 49 homes be built in Havant Town Centre, over shops to encourage footfall?

If development continues at this pace, there will be one conurbation from well west of Havant to Chichester.

There is insufficient need to justify this development.

The last set of housing supply figures omitted any allowance for windfall sites.

The Housing Statement sets out strategic sites to meet housing need. This site was not included.

The shape, size and residential yield of the site questions the need and justification for it.

The NPPF must be taken into account and statements in the framework highlight the site should not be developed.

The housing numbers lost through the deletion of this site could be regained through increasing density on the Southleigh strategic site and urban sites close to the town centres and Victoria Cottage Hospital and Gas Holder site. This is a more sustainable and strategic approach than using sensitive greenfield sites at the edge of the urban area.

Site is noted as 0.97ha - the developable land is larger than this and so the yield of the site is more than 35 and approximately 49.

**Flood risk general**

It is likely that climate change would be a key consideration in assessing the suitability of this site for development, upon which there is no information currently available. Given the uncertainty, we would suggest that more information is required before it can be demonstrated that this site can be allocated, to ensure that there is no increase in flood risk to new or existing development.

Nearby residents could sue Havant Borough Council if flooding takes place.

New homes would be damp.

The tests showed a low water table but tests were done in October.

Previous boreholes show a high water table/ High level of the water table makes this area waterlogged, particularly in the winter months.

Site was rejected in 2013 due to flood risk and nothing has changed since then.

Climate change will increase the flood zones and lead to higher rainfall, exacerbating flood risk

Does not comply with NPPF in relation to not increasing flood risk elsewhere.

Environment Agency may have a model which allows testing of impact of climate change.

Would lead to pollution into the river.
Any application Flood Risk Assessment (FRA) should look at hydrological impacts on surrounding properties.

Application FRA should be subject to expert scrutiny by HBC.

Housing should not be built in the floodplain.

We would only need a 1 in 100 year storm or heavy rainfall for there to be flooding - floods in 1994 hit the national media.

The risk of flooding in Emsworth will be greater if this site is developed.

Do not believe the developer understands the complexity of the water table

Footpath 73/Sussex Border Path has flooded in the past, making it impassable.

The site has previously been discounted in the Strategic Housing Land Availability Assessment on the basis of flood risk.

**Fluvial flood risk**

The site lies directly adjacent to (and partially within) an area of Flood Zone 2 & 3. Properties adjacent to the River Ems have had a long history of flooding. This has driven a study currently being undertaken by the Environment Agency to establish a better understanding of flood risk from the River Ems. This study is likely to change our understanding of the extent of the floodplain and as a result indicate areas where the storage of flood water may be desirable.

It is part of the River Ems floodplain.

Removal of floodplain area would affect nearby properties and those further north in Emsworth.

The land is designated as zones 1, 2 and 3 for flooding.

Blockage of bridge close by could lead to further flood risk upstream, including on the site.

There may not be flooding in the field, but there would be further downstream.

The River Ems has flooded this land when it has been in spate.

In surveys in 2013, the land was classified as flood zone 3.

If the development is built and flood risk is increased downstream, will be seeking recompense from Havant Borough Council for damages caused.

Noted that the highest recorded level of River Ems is 1.04m, however it is stated that once the level reaches 0.80m there would be a possibility of flooding

Whilst the site is in flood zone 1, it borders flood zone 3 and so there is significant potential for flood risk to such a vulnerable site.

The improved southward flow and new sluice gates at Lumley mean that this site is sandwiched into a mini flood plain.

If the river flow is held at Constant Springs even temporarily then the water will back up into this field and potentially into properties.

Environment Agency flood zones do not take into account climate change. EA recommend an increase of between 45% and 105% in river flow over 100 years.

The site suffers from high groundwater levels and sub-surface run-off water, this means there is a greater risk of flooding than its zone 1 status suggests.

Unlikely that the new homes could get house insurance as they would be too close to the River Ems.

The site boundary abuts the extent of flood zone 1. However flood zones are regularly reviewed and subject to change due to climate change increase.

The site is adjacent to a stream corridor and a zone of high flood risk probability.
Suggested wording to criteria c to remove unwanted trade-off as it could infer that a contribution towards flood alleviation could be sought in lieu of provision of a surface water run off solution.

Highlights the Emworth Flood Risk Strategy’s aim to make the most of opportunities to reduce flood risk in the future.

The site sits above a secondary aquifer and is prone to flooding every winter.

**Surface water flood risk**

Field is a depression so it is a natural soakaway.

New residents would experience waterlogged gardens.

What will be done to manage water that soaks off in the field to the stream?

The site is a water meadow and so for much of the year it is a bog.

There have been problems involved in the Redlands Grange/Hampshire Farm development for flooding and drainage - land is waterlogged despite the holding pond.

Surface water already backs up along Westwood Close.

The area has historic drainage capacity issues.

SuDS success depends on contractors’ competence and the avoidance of performance defects, which sometimes happens.

SuDS success reliant on regular maintenance and monitoring. Significant concerns how regular serving would be guaranteed on unadopted roads.

**Geological stability**

Soil is silt and London Clay - not sufficiently stable to build houses.

Field is a depression.

**Public right of way**

The diverted route would need to overcome any flooding/drainage concerns, be surfaced to HCC Countryside Service design standards and a commuted sum provided for its future maintenance. In addition, HCC request that a developer contribution is provided towards enhancing Footpath 73.

The Sussex border path has existed since the middle ages - surely this route should be sacrosanct.

Footpath 73 popular. Moving it to the east would make it impassable in winter. Would contradict NPPF requirements regarding rights of way.

Moving the footpath closer to the river will make it impassable during the winter as it will be waterlogged.

Making the footpath unusable in the winter months is unacceptable when people are recognising the need to exercise more.

Although the plan is to re-route the path, the whole place will change and urbanise.

When there is snow, this can be the only safe route into Emsworth.

Ems Valley is an important green corridor linking Chichester Harbour with the South Downs - further development would diminish the essence of this green corridor.

Concern regarding the impact physical health due to the impact on the Sussex Border Path. Do not take away one of the only remaining spaces for healthy, outdoor fitness in Emsworth, forcing people into a car to find open space.

The proposal for H10 seems to be in complete conflict with paragraph 5.13. The green space with the Sussex Border Footpath running through it is very important to people’s wellbeing. I think your policy should acknowledge concern/ statistical information about the increasing incidence of people developing mental health problems.
Local residents have been able to walk unhindered on the site for 20+ years without having to stick to the footpath.

Nearby homes have had rear access onto the site for 20+ years. This could be formalised as a prescriptive easement in accordance with land registry procedure.

Diversion of the path would destroy the site's amenity value.

Landscape, gaps, open space and tranquillity

Development would remove an undeveloped peaceful and tranquil area.

The field are a green belt site - there must be plenty of brown sites that could be used instead.

The field is a public amenity - will lose one of few country walks left in Emsworth.

Field forms a natural green corridor or gap between Emworth and Westbourne/Hampshire and West Sussex.

Green areas around Emsworth are rapidly disappearing.

Important view of Westbourne Church would be removed.

Should be designated as the Sussex Border Path Local Green Space.

Will impact on village look and feel.

Site is close to Chichester Harbour AONB.

Chichester District Council are identifying the land opposite as an area of natural beauty - why are HBC not doing the same?

Will change the character of the area and effectively join Emsworth and Westborne.

This is a historical area.

Please stop this beautiful countryside being destroyed!

Our children also need to grow up in a village and town where they understand the importance of retaining green spaces.

Fulfils no other purpose than destroying another piece of countryside

Recent adopted Land Use Designations state that the field is Open Land and is a Heritage Environment.

The site is currently a safe, natural playground for children to make dens, climb trees and be in a natural area.

The field is beautiful with the buttercups in full flower.

With mental health issues increasing, we all need the natural environment to remain as unspoilt as possible.

Westbourne cannot afford to lose this wonderful amenity.

The Ems Valley is an historic County boundary between Hampshire and West Sussex.

If development is permitted, the remaining area closer to the River Ems should be designated as a Local Green Space.

Landscape Character Assessment highlights the area as having medium to low capacity for change due to encroachment on the river valley landscape, erosion of the gap. The study concludes by saying that no part of this area is taken forward for development due to its open landscape being particularly sensitive part of the pasture landscape to the Forest of Bere and River Ems.

Local green space

The development site should be identified as a Local Green Space.

Transport, parking and access

Westwood Close too narrow and unsuitable for traffic growth.
People would have to drive to get to Emsworth Town Centre.
Site couldn't be accessed by delivery vans/emergency vehicles.
Westwood Close would be unsuitable for HGVs if minerals had to be extracted prior to development.
Would be a significant increase in traffic near the site.
The extra traffic will generate noise and pollution
The road infrastructure cannot cope with another 49 houses
There has been a huge impact on traffic nearby from Redlands Grange/Hampshire Farm
Increase in traffic will make queues inevitable.
Vehicle movements in and out of the site will be in excess of 200 a day.
There is inadequate parking already on nearby streets.
The proposed access is unacceptable. Westwood Close is already suffering from additional car movements from Redlands Grange.
Used to having children play in the street as it is a quiet cul-de-sac. Concerned that a child could be run over.
How is it intended to have this area policed? Hampshire Farm/Redlands Grange has led to an increase in anti-social behaviour and crime.
Concerns regarding highway safety following several incidents and near misses in the vicinity.
The proposed site plan shows an access road with no footpath at the site entrance - this is not acceptable.

**Ecology**

Has high ecological value for many different species.
Are more common species not important?
Could interfere with Environment Agency project to get migratory fish back into River Ems.
Site used by Bechstein's Bat - maternity roost likely to be present.
Birds of Prey use the area.
The development would lead to a loss of wildlife.
We are out of touch with nature in this modern world and we will all lose out by concreting over wild spaces.
The fields here are unique being unmanaged grazing with no disturbance from agriculture. This attracts many species of birds, mammals and invertebrates.
Site is part of a wildlife corridor from Thorney Island to the South Downs
This is the eastern extent of Salmon being found in any river - if development goes ahead this species will be lost.
Understand the need for more housing but not to the detriment of the local environment.
Brook Meadow is a designated Site of Importance for Nature Conservation (SINC).
River Ems contains an important population of Water Voles.
Retention of hedgerows would be preferable to the use of fencing to preserve ecological value.
The 'gap' provides a corridor for free movement of wildlife.
The site contains oak trees that have existed for 200+ years.
Part of the Westbourne Chalk Streams to Compton Biodiversity Opportunity Area.

**Agricultural land**
It is an important remaining area of farmland.

**Site specific constraints and matters**

- The number of homes proposed is excessive.
- Value of adjacent properties would be significantly reduced.
- Will impact on quality of life.
- Clarification sought on the site area being considered.
- The scheme presented has no aesthetic value, designed to maximise profit. At odds with Policy E6.
- Westwood Close residents would experience increased noise, disturbance and headlights shining into homes.
- Low traffic volumes and lack of through-routes attracted people to live in Westwood Close.
- Westwood close residents would suffer loss of privacy, noise, outlook and overlooking.
- Only gain is a good financial profit for the developer.
- Scheme is a commercial exercise which overrides the wishes and needs of the local and wider community
- The proposal by the developer is 25% more homes than the draft Local Plan, this would be overdevelopment.
- Support for criteria a, b and di-ii.
- Point d,iii should not impose prescriptive limitations on the design and layout relating to tree retention in the absence of a detailed aboricultural assessment, which could be provided with a planning application. The Local Plan should not be prescriptive about limitations on the site. Removal or rewording suggested.

**Infrastructure**

- Concern over impact on infrastructure, particularly primary care, hospitals and education.
- There is a main sewer in the field.
- There are no extra schools and shops planned.
- What will be done regarding the sewage? Old, overloaded pipework already struggles.
- Emsworth's infrastructure is bursting at the seams.

**Affordability**

- The development will be out of the price range of young people who need affordable housing

**Construction impact**

- There will be noise, traffic and mud during the construction phase.

**Residential amenity**

- Westwood Close would be the access road. This would take away privacy, peace and quiet - the reason for living in the road.
- Properties on Westbourne Avenue have all had back access over this land since they were built. This should not be taken away.
- Currently enjoy a tranquil and rural outlook and this would be ruined by the proposed urban sprawl.
- Will affect residents outlook towards Westbourne and Westbourne Avenue will be overlooked as well as rear gardens.
- Proposed houses would be cramped.

**Neighbourhood plans and impact on Westbourne**
The proposed allocation is inconsistent with the near complete Neighbourhood Plan for Westbourne. Once complete, this would form part of the statutory development plan for this area. The area of the Ems Valley in West Sussex is designated in the Neighbourhood Plan as a Local Gap.

Draft Emsworth Neighbourhood Plan Policy L5 states “Housing development proposals of a non-strategic nature will only be permitted if they do not impinge on the current gaps between Emsworth and its neighbouring settlements, nor encroach on the protected landscape area to the north-east or the waterfront area to the south” and also states “Protecting green gaps between settlements will retain the landscape quality with benefits to wildlife, leisure, recreation and mental wellbeing”.

The artificial administrative boundary is used cynically to push development right to the boundary without consideration of the community that live the other side of the ‘line’.

**Windfall sites**

Seems that the site may have been construed as a windfall site. Windfall sites by definition is normally previously developed land which is not applicable in this case. This is not brownfield land.

**HBCs proposed way forward for Regulation 19 HBLP2036**

The Council is aware of the site constraints but has had to consider the site allocation given the high housing need. Nevertheless, the Council will further consider the suitability of the site for development, particularly regarding flood risk. The Council will work closely with the Environment Agency to improve the evidence base and make any necessary changes to the policy approach.

The Draft Local Plan indicates there are sufficient sites to accommodate the need for housing together with a reasonable buffer. This would not change if this site (and others where the principle of residential development is being further considered) is not allocated. On this basis, it is appropriate to further consider the principle of residential development on this site after the relevant discussions with statutory stakeholders has taken place.

Notwithstanding the above, if the allocation is to still proceed in the future, consider whether the policy should be amended to:

- Acknowledge underlying clay / poor permeability in site opportunities and constraints and include a requirement for a geological study and/or drainage strategy
- Be more flexible regarding the incorporation of trees into the design.

Whilst the need to reroute Footpath 73/the Sussex Border Path is not in itself a reason to restrict development. However the policy could be amended to stipulate that the diversion should be to the east of the development’s built form to maintain the rural character of the route and the view to Westbourne. It could also be stipulated that the design and construction of the rerouted route prevent waterlogging during the winter, for example by making it a boardwalk at this point.

The presence of a main sewer will be further investigated and, if necessary, incorporated into any allocation.

The suggestion that the site be designated as a Local Green Space is addressed in the relevant policy (E4).

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- IN1 - Effective Provision of Infrastructure
- IN2 - Improving Transport Infrastructure
- IN3 - Transport and Parking in New Development
- E6 - High Quality Design
- E7 - High Quality New Homes
- E10 - Landscape and Townscape, regarding the separate identity of settlements
- E12 - Managing Flood Risk in New Development
- E13 - Drainage Infrastructure in New Development
Comments where no change is considered necessary:

- The need for housing is Borough wide. As such, the Council must carefully look at all sites that could be suitable for development and cannot thus cap the amount of development to take place in Emsworth. Government is clear on the need to significantly boost the supply of housing and everywhere must play its part.
- The Council is already proposing significant development in Havant Town Centre and other key brownfield sites. This will accommodate a great deal of the Borough’s housing need but these sites cannot meet the need for housing alone.
- Whilst the Environment Agency are reviewing this as part of the study into the River Ems catchment, the site is currently in flood zone 1.
- The fact that existing properties currently have rear access onto the site is not a matter for the Local Plan.
- When considering which greenfield sites are suitable for allocation, the council has sought to prioritise sites of a lower agricultural quality. However, the available evidence is that the majority of land in the borough is of the best and most versatile quality (BMV). Therefore, the allocation of housing sites on BMV is unavoidable if the borough is to meet its housing need. In order to offset the loss of BMV, the policy identifies a need for the development to include community growing provisions such as allotments as part of the open space provision.
- The PUSH Spatial Position Statement supports strategic countryside gaps, but it is not considered that any gaps of ‘sub-regional significance’, nor of ‘fundamental local importance’ exist in the Borough, which would outweigh the need for housing.
- There is no green belt in Havant Borough.
- Whilst the site clearly has ecological value, this can be preserved and potentially added to through development.
- It is accepted that Westwood Close currently serves only a handful of properties and is a cul-de-sac. Whilst the latter point would not change through development, the road would inevitably become far busier and the tranquility of the Close would change which could affect, for example, the ability for children to use the street for play. Whilst this is of course regrettable, it would not in itself result in an unacceptable impact on highway capacity or safety and be a reason to restrict development.
- Any impact on property prices is not a material planning consideration.
- The proposed site is not within the area of the Westbourne Neighbourhood Plan.
- The Emsworth Neighbourhood Plan is not yet made and would need to be in line with the Local Plan.
Summary of key comments raised by residents and other stakeholders

No immediate comment - will wait to see details of any proposed development.

The site can deliver more than 15 dwellings.

The requirement of the policy to reduce surface water runoff is welcomed. Suggest the most appropriate way of managing flood risk is at source, i.e. on site, and that contributing to a flood alleviation scheme should be supplementary rather than alternative method of risk management.

Climate change would likely be a key consideration in assessing the suitability of this site for development, upon which there is no information currently available. More information is required to demonstrate that the allocation of this site is appropriate and that the proposed level of development can safely be achieved.

This development will generate additional footfall on Havant Footpath 72 to the north of the site. HCC therefore request a developer contribution towards enhancing this route.

HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. Subject to the suitability of the site being considered further though a Phase 2 of the Strategic Flood Risk Assessment (SFRA), the council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft with wording amendments and revisions to reflect and incorporate the recommendations of the SFRA Phase 2. In addition, consider the following amendments:

- Amend criterion (c) to confirm there is an on-site requirement to provide a drainage solution that reduces surface water run-off on site in line with Policy E12; and that in addition, a developer contribution may be sought towards a flood alleviation scheme where deemed necessary
- Add a developer requirement to require contributions towards the improvement of the footpath as a result of the additional footfall generated by the development.

Comments where no change is considered necessary:

Whilst the site promoter has not submitted any details of the proposed scheme through the Draft Local Plan, the Council expects applicants to work collaboratively with the community at an early stage (DR1). As part of this, the Council encourages applicants on major, significant and sensitive sites to engage with the community before a planning application is submitted.

All allocations in the Local Plan are set out as ‘about’ rather than minimums or maximums. Depending on the size and type of properties proposed through a planning application, it could be that different numbers of homes are achieved.
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
<th>Details</th>
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<tbody>
<tr>
<td>Suggest inclusion of garden between site and A259.</td>
<td></td>
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<tr>
<td>Relocation of Emsworth Surgery onto this site / a new Health Centre / Healthy Living hub / temporary post-hospital care should be supported.</td>
<td></td>
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<tr>
<td>Support Sheltered Accommodation / Extra Care Housing / Care Home.</td>
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<tr>
<td>Support housing allocation.</td>
<td></td>
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<tr>
<td>Support mixed use for housing and community use.</td>
<td></td>
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<tr>
<td>A greater number of homes / higher density could be achieved.</td>
<td></td>
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<tr>
<td>There is no robust evidence to justify that the community use is still required on site.</td>
<td></td>
</tr>
<tr>
<td>If healthcare use is not possible, support community use, not housing or commercial use.</td>
<td></td>
</tr>
<tr>
<td>Existing building should be retained or a similar building provided to improve North Street area.</td>
<td></td>
</tr>
<tr>
<td>Cottage Hospital was paid for by Emsworth Residents - their views as to its future should be respected.</td>
<td></td>
</tr>
<tr>
<td>HBC should work with the CCG and other partners to strengthen the role this site has to make to providing care and support to older people in the area.</td>
<td></td>
</tr>
<tr>
<td>It is a lost opportunity that there is no plan to knock down the former cottage hospital in North Street in Emsworth and redevelop the site. The building is a brutalist faux Victorian mess and has been an eye-sore for at least 40 years. There is no reason to not redevelop the site.</td>
<td></td>
</tr>
</tbody>
</table>

#### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments.

In addition, consider whether policy should be amended to include the garden land to the south.

Comments where no change is considered necessary:

- The policy allows for both housing and community uses, which could include accommodation for the elderly and / or health care uses.
- The heritage value of the building has been assessed by the Council’s conservation officer and found not to warrant a requirement to retain the building as, although the building itself appears to have Victorian elements, it has been heavily altered over time.
- The site yield is based on a desktop estimate of a possible scheme with community uses on the ground floor and flats above. No evidence has been submitted that suggests that a higher number of dwellings would be suitable here. The number in the allocation does not preclude a future developer demonstrating that a different number is acceptable.
- The policy allocates the land for development, which could include replacement of the building.
## Summary of key comments raised by residents and other stakeholders

It is within the settlement boundary but visible from the shoreline footpath and the water. Therefore development should be sympathetically designed to ensure the setting of the AONB is conserved and enhanced. A bullet should be added to 'design and layout'.

The policy recognises the risk of flooding to the site, but does not acknowledge the impact of climate change, which will result in a much greater proportion of the site being at risk of flooding over the development lifetime. You should be satisfied that this will not compromise the ability of the site to safely accommodate the number of dwellings proposed.

Would expect development at this location to provide a direct pedestrian link to the Havant Footpath 56, which forms part of the Solent Way / Wayfarer’s Way, and runs along the southern boundary of the site.

Allocation does not highlight impact on residents in Beacon Square or Curlew Close or Clovelly Road.

Development would increase surface water flood risk.

Site is home to wildlife, including Bechstein’s Bat.

Potential harm to TPO trees.

A shallow sewer crosses the site.

Loss of open space adjacent to the AONB’s coastal path.

Preamble refers to site being adjacent to the AONB but this is not picked up in the policy.

Should be a maximum of seven houses, not about seven.

Concern over the location of the access.

How will this meet criteria for affordable housing?

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider the following:

- Highlight that the site has ecological value, including potential for Bechstein’s Bat and so an ecological assessment would be needed
- Requiring an arboricultural assessment to support any planning application
- Highlight that the site should consider the setting of the Chichester Harbour AONB
- How the issue of residential amenity should be addressed, potentially by removing the specific reference to Warblington Road and so widening out the issue to all neighbouring properties
- Consider whether access should be provided directly from the site to Footpath 56.
- Clarify the site yield, bearing in mind climate change impact to tidal flood zone.

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Access (IN3)
- Drainage (E13)

### Comments where no change is considered necessary:

The allocation as drafted acknowledges the sewer that crosses the site and requires an easement over it. As a result, it is considered that this issue is already addressed.
All allocations in the Local Plan are set out as ‘about’ rather than minimums or maximums. Depending on the size and type of properties proposed through a planning application, it could be that different numbers of homes could be achieved.

Given the size of the site, no specific affordable housing would be provided. This is in line with national policy in the NPPF and the Council is not able to change this.
Summary of key comments raised by residents and other stakeholders

Objection to the site being developed for housing as it is unsuitable.

Redlands Grange is next to H14 and has not been shown on the map.

Redlands Grange, H6 and H14 will convert the north-east corner of the Borough from one of the most rural to one of the most highly developed areas.

The site is outside of the urban area (Policies AL2 and CS17 of the Adopted Local Plan). It is on semi-rural land, effectively in the countryside and, in accordance with the NPPF, ‘conserving and enhancing the natural environment’, no development should take place.

The area is currently greenfield consisting of open spaces, countryside, natural habitats, trees and hedgerows; development would result in the loss of these amenities and be out of character with the surrounding area.

The site’s development would conflict with Policy E19 (Best and Most Versatile Agricultural Land).

There is a large maternity roost of Bechstein’s bat to the north of the site; there is little evidence of successful mitigation measures to protect this species.

There is the potential for badgers, dormice, birds and reptiles to be on or surrounding the site.

The site is adjacent to Redlands Lane which forms part of the Ancient Sussex Border Path; development will create dangers for drivers, walkers and cyclists using this route.

Request that a direct pedestrian link is included from the site to Havant Footpath 67 (Redlands Lane) and a contribution is provided towards its maintenance as to mitigate for increased footfall.

Access to the site is constrained:
- Long Copse Lane and the north of Hollybank Lane are single tracks with no footpaths
- Development (in combination with H6) will result in extra cars along the roads stated above
- Past observations of construction vehicles stuck at the top of Hollybank Lane during the Oak Tree Drive development.

The hospital and local schools are at full capacity and are unable to handle the estimated number of people from sites H6 and H14; the nearest school is also quite a distance away.

The site is isolated with the nearest bus service a 15-minute walk away; this will encourage greater car usage.

There are known surface water drainage issues and groundwater flooding problems in the area; this includes the recent Redlands Grange development which has incorporated SuDS.

The policy requirement to reduce surface water runoff is supported. It is suggested that managing flood risk at its source (i.e. on site) is the most appropriate risk management technique and that contributing to a flood alleviation scheme should be supplementary rather than an alternative.

HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to:
- State that development provides a drainage solution onsite and that a contribution is supplementary rather than an alternative (criterion c)
- Delete the reference that the site is greenfield and replace with alternative wording, such as “this is large housing in substantial grounds” rather than brownfield
- Include a design and layout requirement that the development includes a direct pedestrian link from the site to Havant Footpath 67 (Redlands Lane) along with a maintenance contribution as requested by HCC
The following detailed matters are for consideration at the planning application stage and are covered by policies in the Local Plan:

- Access (IN2 and IN3)
- Ecology (E15)
- Flood risk and drainage (E12 and E13)

Comments where no change is considered necessary:

- Redlands Grange is shown in the south-east corner of Figure 35
- The Council is proposing a renewed approach to the regeneration of brownfield land; however, it will not be possible to meet the Borough’s housing needs from brownfield and greenfield sites in the Borough’s existing urban boundary (Policies AL2 and CS17) alone. Therefore, sites outside of the existing urban area have had to be considered for development. This was addressed in the consultation on the Local Plan Housing Statement in 2016
- It is considered that the site contains Grade 4 agricultural land; this is not BMV agricultural land therefore draft Policy E19 does not apply
- The potential for the wildlife, including Bechstein’s bat, has been highlighted in the site’s opportunities and constraints (page 188) and has been referenced as part of the developer requirements
- The established network of natural habitats in the Borough will be outlined as part of the review on the Havant Borough Biodiversity Action Plan (BAP) which will be available in due course.
- The current and future capacity of the local schools and health facilities, along with public transport capacity and future growth, have been reviewed as part of the Borough-wide Infrastructure Delivery Plan (IDP)
A petition with 3,458 signatories with the following covering letter: "Full infrastructure review in area of 40 Acre Farm prior to planning submissions. We the undersigned feel strongly that Any planning permission on 40 Acre farm should be halted until the Local Plan 2036 submission to Government That the development process should be halted until a full site and surrounding infrastructure review, with all applicable bodies, be carried out in line with Schedule 4 of T&C planning That all development should be halted until the publication of the NSSMP Priority Action No.2 & No.3 with regards to the site being identified as High suitability for Brent geese and Waders in a previous Havant Council survey. That all development consultations be halted until the developers claims of school catchment areas have been verified and safe access to catchment schools for children on foot assured. That full post-construction costings of maintenance, health and Safety issues of the proposed SuDS are identified, analysed and reported. That any other points brought up during public consultations or private correspondence be minuted and made available for public discussion prior to any planning decision being made."

Support for housing development on the site.

Transport:
- High speed traffic would need to be discouraged on Havant Road and two or three central reservations should be provided to ensure safe crossing / traffic lights should be provided to aid safe crossing
- More speed limit signage is needed / speed limit should be reduced
- The A2030 is already unmanageable in the morning and evenings in relation to the Rusty Cutter roundabout
- Alterations to the Rusty Cutter roundabout will cost millions; is this financially viable?
- Trying to cross the Rusty Cutter roundabout by foot or cycle is already dangerous
- A pedestrian/cycle link underneath the A3(M) would link the development to Bedhampton station
- If left turn only out of the development this will create a rat run situation on local roads as cars attempt to return eastbound. A right turn option will be dangerous or increase congestion
- Concern over access design

Other infrastructure:
- Patients can not get appointments at local doctor surgeries. Drayton Surgery no longer accepts patients from Bedhampton.
- The high number of houses proposed in the area will increase pressure on local schools which are already full
- School runs will take more time and adversely impact working parents
- There is no safe way for children to be able to walk to school
- The proposal for Morelands school to be the assigned school for the area is massively concerning for someone considering a family - the walk over the hill to access this is over 50 minutes, it would necessitate a trip by car and completely goes against all of the national initiatives around walking your kids to school and reducing car journeys and pollutants to protect the environment.
- A new school should be required on the site
- Welcome the approach in the policy regarding education infrastructure. However supporting text should be updated to ensure complete consistency with the IDP, which states that Morelands School can expand to 3FE. The next version of the Local Plan should reflect the latest position agreed with Hampshire County Council.
- Queen Alexandra Hospital is already at breaking point
- The infrastructure associated with Forty Acre Farm needs to ensure the site is deliverable and any wider cumulative improvements should not restrict the delivery of the site. Contributions should be sought from surrounding developments to deliver the wider cumulative improvements
- This site is being pushed forward faster than it should and that more time be devoted to researching the infrastructure needs
- The need for Secondary School and College places has not been discussed
• Offsite water mains reinforcement will cause disruptions to local residents

Drainage:
• Flooding of the site is a concern
• Possible diversion of surface water into Westways should be addressed
• Proposed SuDS ponds in flood area 2 and 3 will be a breeding ground for mosquitoes - how would issues such as these be monitored and remedied?
• The sea water flood plain is designated as a “high level constraint” by the Environment Agency
• The area is a “flood risk area from surface water” - The fields currently act as a natural ‘sump’ absorbing surface water. With any development the ‘sump’ will disappear
• There is insufficient capacity within the foul sewage network to take the proposed discharge from the site
• In 1980 a planning application at Forty Acres Farm was refused by HBC, for a housing development, due to a sewage reason and unsatisfactory disposal of foul and surface water
• Any SuDS features must be outside of the flood zone to be effective

Ecology:
• Brent Geese are present on the proposed development site, the nature reserve area proposed by the railway line will not protect the geese.
• A new survey should be conducted using local residents and independent sources who have the time to monitor the site and report accurately. All development should be halted until the publication of the North Solent Shoreline Management Plan (NSSMP) Priority Action No.2 No.3 is completed
• Bats and deer are present on site. Any wildlife will be driven away by development
• A bat study was undertaken in 2016 showing four species of bat using hedgerows at the rear of Westways and within the site
• Brent Geese are not using the mitigation land next to the One Eight Zero Development, the mitigation proposed on the 40 Acre site is also unsuitable.
• HBC is working off an amber bird list which is 8 years out of date. During this time I have recorded 150 plus Brent Geese. Numbers and photographic evidence may be found on the Solent Birds web site.
• The evidence base is incorrect with regard to Brent Geese and waders. There are regularly 50+ birds feeding
• The nearby Farlington Marshes protected area may be impacted by development
• Figure 22. Map doesn't show Forty Acres as a Sites of Importance Nature Conservation (SINC) Hampshire Biodiversity Information Centre (HBIC) shows it as H04B & H04C

Health impacts arising from:
• Increased pollution and noise from more cars
• Lights from cars shining into bedroom windows due to raised ground level
• Higher ground level which will create higher building heights relative to surroundings, this will create less light for adjoining dwellings.
• Large dust clouds which may affect the quality of life of adjoining residents will result from construction works and re-grading.
• Pollution arising from the motorway and rail line affecting future residents of the development.

Further parking assessment should take place as distance to schools promotes car ownership and use - pedestrian access to Westways will make it easy for overspill parking to occur in Westways, particularly associated with the care home which does not have enough parking. Parking for a convenience store must be secured and appropriate.

The field is high quality agricultural land and no reference is made to this in the policy. Provision of allotments is not sufficient to offset the loss of agricultural land.

Tree screening proposed to the front of the development should be provided prior to any commencement to ensure this is established by the time building work is complete.

PUSH specifically states there should be separate identities between boroughs. The current gap between the two authority areas should remain. This gap is of particular importance as it is surrounded by commuting
routes of A27, A2030 (Havant Rd), A3M, and the London to Portsmouth and South Coast Railway Line. Forty Acres is easily visible from all these transport routes by hundreds travelling each day. So according to PUSH it should be preserved.

No mention is made in the plan of consultation with Portsmouth County Council.

To lose the last remaining green space at the bottom of the hill is irresponsible - Housing need should be balanced against the need to protect green spaces. Forty Acres is a local green space.

The potential for the site to accommodate a convenience store has been investigated in depth, provision of a convenience store is not feasible and reference to this should be removed from the policy.

The land should be used for sport provision and to generate a better green environment rather than housing.

Three storey buildings do not fit in the street scene.

The play space being located next to the SuDS ponds is unsafe.

To develop this site contradicts Councillor David Guest, Cabinet lead for Planning and Place-Making with regards to "...continued protection of the high quality environment that makes Havant an attractive place to live and work and visit". Residents feel HBC lacks the conviction to stand up and protect the wellbeing and environment of its residents and is bowing to central government.

Trees with TPO’s would need to be felled in order for the development to proceed. Are these trees healthy and just deemed a casualty in order for development to proceed.

The general area has many instances of Late Iron Age and Roman settlement, which would be disturbed and lost. As a local historian, this concerns me.

HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to:

- Provide greater certainty that safe access to local schools must be provided
- Include reference to the current agricultural use of the fields
- Remove the requirement for a convenience store
- Update references to reflect further discussions with Hampshire County Council which indicate that children arising from the Forty Acres will feed into Bidbury Infant and Junior Schools (rather than Morelands School). This is subject to highway improvements to provide a safe and convenient route to the schools.

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (including parking) (IN3)
- Access (IN3)
- Future management (including SuDS) (IN4)
- Ecology (E15)
- Flood risk and drainage (E12 / E13)
- Residential amenity and pollution (E6 / E20)
- Archaeology (E9)
- Woodland, trees, hedgerows, TPOs (E15)
- Landscape and Townscape (E10)
The draft Infrastructure Delivery Plan (IDP) which was published alongside the regulation 18 draft of the Local Plan, identifies deliverable solutions for 30 different types of infrastructure with the notable exception of transport. The following matters raised are considered in detail through the draft IDP:

- **Transport** - Buses, walking and cycling
- **Green & Blue** - Open space and playing pitches, coast including flood risk management and defences, SUDS and other drainage systems, green routes including public rights of way and ecology including SPA
- **Social** including leisure (built sports facilities) and community centres
- **Health** - Primary care (GPs and health centres) and Acute care (hospitals)
- **Education** - Schools (primary and secondary)
- **Utilities** - Water supply, electricity, waste water and sewage disposal

Comments where no change is considered necessary:

Some of the comments made relate to the developer’s proposals as presented in November 2017. These proposals may change, and will be considered against the relevant policies when an application is made.

The part of the site where housing development is proposed is located within Flood Zone 1, an area with less than 1 in 1000 year annual probability of sea or river flooding. Concerns raised in relation to flooding in this area are likely to be in relation to surface water flooding due to ground conditions and location. As above, an appropriate drainage strategy as part of any proposed development would be secured in accordance with the requirements of policy E12. A part of the southern area of the site is in flood zones 2 and 3. Any development vulnerable to flooding would be required to be located in flood zone 1.

When considering which greenfield sites are suitable for allocation, the council has sought to prioritise sites of a lower agricultural quality. However, the available evidence is that the majority of land in the borough is of the best and most versatile quality (BMV). Therefore, the allocation of housing sites on BMV is unavoidable if the borough is to meet its housing need. In order offset the loss of BMV, the policy identifies a need for the development to include community growing provisions such as allotments as part of the open space provision.

Although Hampshire Biodiversity Information Centre list the site as a SINC, this is incorrect. A SINC is a local designation and can only be applied by the Local Planning Authority. The site is likely to be termed a SINC by the Hampshire Biodiversity Information Centre due to its use by Solent waders and Brent Geese. This is highlighted in the Draft Local Plan through Policy E17. As such, appropriate protection of these species is already provided without the need for a SINC designation.

The proposed development is in line with the latest data regarding the Solent Waders and Brent Goose network, which has been put together in consultation with Natural England. As such, matters relating to NSSMP Priority Actions No.2 and No.3 are not applicable in this instance. The Eastern Solent Coastal Partnership are a partnership, including Havant Borough Council. The findings of the study will inform the future approach to coastal development and coastal defences in the Local Plan.

This Policy seeks to maintain the high-quality environment of Havant by effectively managing future development.

The PUSH Spatial Position Statement supports strategic countryside gaps, but it is not considered that any gaps of ‘sub-regional significance’, nor of ‘fundamental local importance’ exist in the Borough, which would outweigh the need for housing.

It is acknowledged that undeveloped gaps were protected by policies in the adopted Local Plan. However, in the new HBLP2036 it is no longer possible to continue this protection, as there are not enough brownfield sites and sites within the existing urban area to meet the Borough’s housing need. Therefore, greenfield sites outside of the existing urban area have had to be considered for development. Figure 18 draws the
settlement boundaries around existing developed areas, and the proposed allocations in the draft HBLP2036, and E10 seeks to manage development outside of these areas (windfall sites).
Summary of key comments raised by residents and other stakeholders

**Principle of Allocation**

Support for this policy, which allocates UE02a and UE53.

Support Criterion b. which requires that the site is developed comprehensively, or if this is not possible, the development of one part must not prejudice the development of the other part.

Criterion b. pertains to matters that are private legal matters and do not fall within the remit of planning and as such part b of the policy should be removed from the policy. The two parts of the site (UE53 and UE02a) should be allocated individually.

Objection based on loss of the gap between Emsworth with Denvilles/Warblington and destruction of the identity of these communities / The Council gave assurances that there was no intention to develop land between Denvilles and Emsworth.

The Council should be willing to be more robust in the protection of the Emsworth - Warblington gap as was the case in the prior local plan. No new evidence has been provided as to why the existing policy has been so conveniently ignored.

Do not disagree with any of the allocation site's opportunities and constraints identified by the Council.

**Traffic & Transport**

A single access point (off St George's Avenue) is insufficient.

Agree with suggestion that access should be taken from St George’s Avenue (criterion h iv).

The need for traffic calming measures (criterion c) will be assessed through detailed transport work at the application stage.

Support need for traffic calming measures (criterion c).

Support requirement for new pedestrian and cycle access to Emsworth Road in the south-west of the site (criterion h v).

Support requirement h vi, to provide, or at least not prejudice pedestrian and cycle link under the railway line to provide easy access to Warblington station from Southleigh (criterion h vi).

Concerned about the effect of a very high increase in the volume of traffic from any new development through Castle Avenue, on to Southleigh Road, past Warblington School, and through the level crossing at Warblington Station.

Southleigh Road is already congested by the crossing and it is clear that extra traffic will lead to severe congestion around the school and backing up along Castle Avenue and Southleigh Road. Safety issues will arise particularly around the school.

If development goes ahead provide road access to the site which does not use St Georges Avenue Castle Avenue or Warblington Avenue as access routes.

Given the size and proximity of the site and its potential impact on the SRN, either individually or cumulatively, it is requested that any potential adverse impacts to the safe and efficient operation of the SRN be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

**Character of the Area**

The area of Castle Avenue/St Georges Avenue/ Warblington is a particularly quiet and high amenity value housing area of Havant which risks being compromised. The nature of such areas should be preserved in order to provide attractive housing environments for potential incoming residents.

The proposed number of dwellings is approximately double that on the similarly sized Castle Avenue, suggesting the development is out of keeping with the local area and will result in the construction of densely
packed houses with inadequate gardens and parking. The nature of any properties constructed must closely match the character and layout of the surrounding streets or else the number must be reduced.

The site itself, while physically close, is visually removed from the AONB due to being on the north side of the A27, and therefore is unlikely to have a significant impact on the setting of the AONB.

The large number of dwellings proposed and proximity to Chichester Harbour mean that the development is likely to contribute to recreational pressure within the Harbour and therefore the policy should include a criterion to ensure that this is addressed.

**Infrastructure**

HCC state that no early years comment included.

There is insufficient space to provide adequate space for the provision of formal allotments. Policy wording should be amended to remove reference to allotments to provide flexibility for alternative methods of provision.

**HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether policy should be amended to:

- Remove reference to some of the specific access points and/or mitigations measures as these will be determined by site specific transport assessment work at the application stage

**Comments where no change is considered necessary:**

- There is no need to split the site into two allocations, as the policy allows for the two parcels to come forward separately. This is a matter for the Local Plan as it is necessary to ensure that if the site comes forward through two applications, that it contributes collectively to a high quality development and provides the necessary infrastructure
- The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations, including on previously identified gaps between settlements
- The estimated site yield is based on a desktop exercise assuming a site yield of 35 dwelling per hectare. This is considered to be low density in current terms.
- Any need for early years provision has been addressed through the Infrastructure Delivery Plan
- No need to remove the specific mention to allotments, since they are an example of food growing; Applicants may demonstrate which specific type of food growing is the most appropriate for their site.

The following detailed matters raised in the comments are for consideration at planning application stage and are covered by policies in the Local Plan:

- Detailed design (E6 and E7)
- Landscape and Townscape (E10)
- Site specific impacts on the local road network (IN3)
- Access (IN3)
- Residential amenity (E6 / E20)
- Solent Special Protection Area (E16)
Support for policy.

Concerns over impact on traffic.

Proposed access to the site via Brockhampton Road is already heavily congested.

Concerns over impact on neighbouring properties in terms of overlooking and loss of privacy.

Concern over impact on community and ambience of established neighbourhood.

Parkland is over natural springs and unsuitable for building.

Concern that development will result in loss of views over grounds where there is an abundance of wildlife, trees and open park land.

Text regarding loss of trees should be amended for greater flexibility when considering site layout.

Use class of dwellings should be made flexible to include a mix of C3 and C2 uses.

The Pump House is to remain in operation and be maintained as a locally listed building and buildings adjoining the pump house need to be retained for operational reasons. The red line should be amended to reflect this (see rep). The site is still considered capable of delivering 120 homes (revised site area 2.83ha).

Since the proposed allocation includes a Locally Listed Building, text should be amended to read as follows: Preserves and/or enhances the character of the conservation area subject to appropriate planning balance.

Given how quickly any potential pollution could reach the drinking water supply in this area a construction method statement should be required.

The site is likely to be underlain by sand and gravel and therefore there is a likelihood that the site contains safeguarded minerals. Developers should undertake a minerals assessment.

No early years or related infrastructure has been included.

Given the proximity of the site and its potential impact on the SRN, either individually or cumulatively, it is requested that any potential adverse impacts to the safe and efficient operation of the SRN be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

**HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with potential wording amendments. In addition, consider the following:

- Amend site boundary
- Potential to provide both C2 and C3 uses
- Retain vehicular access to pump house
- Include reference to setting of locally listed building
- Require construction method statement (in point (a))
- Add minerals assessment to point (a)
- State that any adverse impact on the SRN is considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:
- Site specific impacts on the local road network (IN3)
- Access (IN3)
- Ecology (E15)
- Woodland, trees, hedgerows, TPOs (E15)
- Heritage (E9)
- Residential amenity (E6, E20)

Comments where no change is considered necessary:

Development on land within Source Protection Zones is dealt with by Policy E22.

The capacity and future growth of early years infrastructure has been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP).
Summary of key comments raised by residents and other stakeholders

The site allocation boundary is greater than the extent of Hampshire County Council ownership.

Concern that Government policy on local rent allowance has caused delay to site delivery.

HCC would expect any development at this location to provide high-quality pedestrian links to Shipwrights Way.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments.

In addition, consider the following:

- Review the site allocation boundary and amend site plan as appropriate
- Whether to include requirement to provide pedestrian and cycle routes to Shipwrights Way as part of the design and layout

Comments where no change is considered necessary:

Whilst concerns in relation to the timescales for the site delivery are noted - given the extant planning permission (reference APP/15/00303) is due to expire in December 2018, it is considered appropriate to retain the site as an allocation accordingly.

The Government’s policy on local rent allowance is not a matter for the Local Plan to consider.
<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Developable area limited by flood risk constraints - potentially less suitable for residential development.</td>
</tr>
<tr>
<td>Deliverability of the quantum of new homes is doubtful.</td>
</tr>
<tr>
<td>It is requested that any potential adverse impacts to the safe and efficient operation of the Strategic Road Network (SRN) be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.</td>
</tr>
<tr>
<td>Environment Agency welcome the requirement to provide sufficient easement to the Heritage Stream. The identified future risk of flooding has not been translated into the policy wording. More information is required before it can be demonstrated that this site can be allocated, to ensure that there is no increase in flood risk to new or existing development.</td>
</tr>
<tr>
<td>HCC supports criterion (b)(v) of this policy, which seeks to retain and enhances the existing right of way. An aspiration of the Hampshire Countryside Access Plan is to upgrade Havant Footpath 35 (which forms part of the Wayfarer’s Walk) to a multi-user one from Brockhampton Road to Meyrick Road.</td>
</tr>
</tbody>
</table>

**HBCs proposed way forward for Regulation 19 HBLP2036**

No matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. At this stage, the council is satisfied that the evidence base supports an allocation. However, given that much of the site is in future Fluvial Flood Zone 3, flood risk constraints will be considered further through Phase 2 of the Strategic Flood Risk Assessment (SFRA).

Proceed with policy as proposed in the regulation 18 draft, with wording amendments and revisions to reflect and incorporate the recommendations from the SFRA. In addition, consider the following:

- Review site capacity having regard to site-specific constraints and the site submission from the landowner.
- An additional criterion to ensure the safe and efficient operation of the SRN.
- Whether it is appropriate to include a developer requirement for a contribution towards the improvement of the footpath.
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Support the allocation and the accompanying policy details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Object as site is in a strategic gap / outside the urban area / would result in the loss of open spaces, countryside and natural habitats</td>
</tr>
<tr>
<td>Schools, doctors and hospitals are at capacity</td>
</tr>
<tr>
<td>More suitable sites for development need to be found which will have far less impact on the surrounding environment and have an infrastructure capable</td>
</tr>
<tr>
<td>This greenfield site does not appear to be particularly affected by any constraints that would act to fundamentally prevent its development</td>
</tr>
<tr>
<td>Requirement for access arrangements to be coordinated (criterion c) means delivery of this site is unlikely to occur during the earlier part of the plan period.</td>
</tr>
<tr>
<td>H21f(i) states that there shall not be any residential development within 183m of the crematorium. However, the policy does not specify whether this is to be measured from the boundary or the structure itself. This point should be clarified as this has potential implications in relation to the extent of the available developable area.</td>
</tr>
<tr>
<td>East Hampshire District Council suggest that the map should be amended to clarify that the allocation is only for that part of the site that lies within Havant Borough. A dotted line to show the wider extent of the land ownership can be used to show the potential extension in East Hampshire District (which will be subject to the EHDC Local Plan Review).</td>
</tr>
<tr>
<td>HCC would expect development at this location to contribute towards high-quality multi-user links to Southleigh Forest and the Southleigh allocation to the south.</td>
</tr>
<tr>
<td>It is noted that the Land West of Havant Crematorium (H21) is smaller than criteria usually used for judging impacts on the mineral resource (3 ha), however when combined with a prospective development in the adjacent East Hampshire District Council area it becomes a more significant site of 6.28 ha, therefore HCC encourage prospective developers to undertake minerals assessment of this site prior to development.</td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments:

- Amend criterion (f)(i) to specify that the design and layout must meet the requirements of the Cremation Act 1905

In addition, consider whether to add requirements:

- to contribute to high-quality multi-user links to Southleigh Forest and the Southleigh allocation to the south
- to explore opportunities for the prior extraction of minerals

Comments where no change is considered necessary:

The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.

The Local Plan is underpinned by an Infrastructure Delivery Plan.
Summary of key comments raised by residents and other stakeholders

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

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

Objections to the site’s development and requests to remove the site from the HBLP 2036.

The need of housing is understood; however, the site is unsuitable for development.

The public good that might be generated from development would not outweigh the harm and danger that would arise from development.

The Council should insist on the development of brownfield land, especially industrial land which is underused for development.

The area has “done its bit” for new housing; the Council has not improved the area’s recent influx of new development through new services, road traffic management and/or upgraded amenities.

Existing residents have paid a premium to live in the area; the proposal has already stagnated property prices.

New housing in the area would not be affordable for the individuals who need them.

Suggestion to reduce the site capacity to 10 dwellings and set them back from the road.

Concerns that development will set a precedent for further development on adjacent fields and contribute to urban sprawl; along with comments regarding a “concrete jungle” and concerns regarding the erosion of local gaps and the merging of the area with Farlington and Drayton.

Previous consultations introduced policies whereby development between settlements should only be approved if it maintains the separate identity of settlements.

Concerns over the capacity of doctors, dentists, schools and utilities (i.e. drainage and water supply) in the area at present.

The Council and the Planning Inspectorate previously rejected the site’s inclusion in the Local Plan (Allocations Plan) [July 2014] for 15 to 250 dwellings; the Council stated at the time that it was the least favoured site at the time. The Inspector’s decision is a material consideration.

There is "contingency" within the Draft HBLP 2036 to remove the site; the ability to provide 50 dwellings could achieved on less sensitive sites.

The development would increase the number of dwellings along Lower Road by two-thirds.
Recollections of how re-building homes in and around the Old Bedhampton Conservation Area was difficult due to restrictions on design, layout and materials.

Question raised as to why houses were not built on the Central Retail Park in Havant Town Centre when the option was available at the time.

The site is close to Langstone Harbour, an Area of Outstanding Natural Beauty (AONB).

The inclusion of this site renders the whole HBLP 2036 unsustainable.

Support for the site’s allocation; the site is a sustainable location due to proximity to shops, public transport and pedestrian/cycle routes.

The site will include affordable housing to meet the LPA’s policy requirement of 30%.

**FLOODING & UNDERLYING AQUIFER:**

The road and site are low-lying and adjacent to a flood plain; the area regularly floods, as such development and tree removal will exacerbate this further.

Concerns over the proximity of the site to a natural spring.

Lower Bedhampton constitutes a vital aquifer for this area; the proposed sites falls within a Protected Zone.

Although the requirement to mitigate potential impacts to the solution feature and avoid contamination by pollutants is accepted, an objection is raised for the mitigation to be agreed with both Portsmouth Water and the Environment Agency. This duplicates the responsibility and risks a conflict between the public duties and private commercial interests of the water company.

**CONSERVATION AREA & HERITAGE:**

The site would be accessed through the Old Bedhampton Conservation Area; this would increase traffic and destroy the historic heritage, landscape setting, character, amenity and tranquil feel of the area.

The Conservation Area’s Appraisal states on page 5 that: ‘An important aspect of the character of the Conservation Area is the relationship of the old village with the surrounding countryside and open spaces…..the village still enjoys an open and undeveloped setting’.

Questions raised regarding the timing of this proposal when a heritage consultancy has been commissioned with the agreement of the Council to report on the Old Bedhampton Conservation Area Appraisal. There were also concerns that this report will not be available until later this year.

The emerging Old Bedhampton Character Appraisal may result in the revisions to the boundaries of the Conservation Area and guidance on how to protect the area from detrimental impact of development outside its boundaries.

The area is associated with the poet John Keats due to his frequent visits.

The area should be viewed with pride as an example of conservation in action.

The landowner makes the land available to archaeological groups periodically (recent January 2018) to search and find artefacts and coins dating back to the Roman era.

Suggestion that the small-brick railway bridge should be investigated for archaeological and historical relevance.

Concerns over the foundations of the Elms (Grade II listed) from heavy traffic (both private and commercial); damage would undermine the expenditure made in the last two years to strengthen the building.

The Elms is not mentioned in Paragraph 6.104 of the HBLP 2036.

Development would be against the principles of Paragraphs 129 and 132 of the NPPF and Section 66(1) of the Planning Listed Buildings and Conservation Areas Act 1990; along with the principles to ensure development is in keeping with the character of the surrounding area.

Appeal decisions from elsewhere in England show that Inspectors feel that even when the harm to the setting of heritage assets would be less than substantial this would not be outweighed by the public benefit.
Development is contradictory to Paragraphs 5.105 and 5.109, along with Policies E9 (especially Criterion d) and E10 (especially Criterion a.i) of the Draft HBLP 2036.

Development is contradictory to the statements in the "where next for the environment" booklet.

The original supplementary conservation area guidance recognised the area as having a rural character; Criterion f.ii) contradicts this as it refers to a semi-urban/rural setting.

The Landscape Character Assessment Sensitivity Report 2007 noted the winding alignment of the area’s roads and how the railway, A27 and A3 bypass have preserved the tranquil character of this historic core. It also notes that a key local issue will be preventing developing eroding the settlement character.

The Borough has limited cultural heritage; the area is important for tourism and education.

The Planning Officers have a professional duty to safeguard such heritage and ecological assets.

Questions raised regarding whether Historic England (HE) have been consulted.

The site will reflect and protect the historic context of the locality, including the Conservation Area and nearby listed buildings.

**Biodiversity & Open Space:**

The site is prime agricultural land and is used annually for growing crops.

The site and its surrounding hedgerows are used by wildlife including, foxes, deers, bird of prey (e.g. Buzzards and Red Kites), woodpeckers, kingfishers, geese and bats.

Proposed plans have been seen by residents from pre-application discussions (obtained via FOI); these include the removal of 40m of hedgerow which would be a contradiction of Paragraph 2.35 and the objective to protect or enhance the natural environment of the Draft HBLP 2036.

The site is identified as “important” for Brent Geese and Solent Waders.

The allocation appropriately highlights that the site is identified in the Solent Waders and Brent Goose Strategy; however, the RSPB urge that the update of the Strategy is consulted as further information on the use of this site is available.

Policy E18 (Figure 25) shows that the Bechstein’s bat area covers the site yet this is not listed under the constraints of the site.

Observations of bats, including Bechstein’s bat, in the area; development would break the continuous corridor/network of their habitat.

Concerns over the environmental impact the development will have on Bidbury Mead.

Concerns over the loss of open green space which is of natural beauty and valued by residents.

The site will include several diverse areas of open space provision and retention/protection of existing trees on boundaries.

Objection to criterion f.iii). The public open space should be located in the south part of the site. There is substantial tree buffering along the eastern edge of the site that already provides effective containment to the site and ensures screening to views from that direction.

**Rights of Way:**

Suggestion that a link between the site and Havant Footpath 30 would be a benefit.

Request that a contribution is paid to Hampshire County Council (HCC) towards enhancing Havant Footpath 30.

Development should not compromise the ability of the agricultural access bridge to be used for future pedestrian/cycle access.

It is requested that any potential adverse impact to the safe and efficient operation of the SRN is appropriately considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013.
ACCESS & TRAFFIC:

Access to the site is via a narrow, blind, triple bend with no pavements.

Road widening would not be possible due to the impact on the Old Bedhampton Conservation Area.

Access via the enclosed end of Lower Road is not possible due to current Traffic Planning Laws and the location of the A3(M), Tear-drop junction and Rusty Cutter roundabout.

Access via Kingscroft Lane is not possible as it cannot accommodate two-way traffic.

Pre-application discussions (obtained via FOI) show that the access is proposed from the middle of the lower road frontage. This will impact upon the “sunken lane” nature of Lower Road where mounding exists.

The pre-application proposal introduces kerbs; this will visually intrude into the landscape and character of the area. It also shows that there is no proposal for road widening of Lower Road or footpath on the north side.

Grass verges have already been damaged by parked cars and vehicles passing one another.

Questions raised as to whether the access has been discussed/consulted with the Highway Authority.

Brookside and Lower Roads are below modern road standards due to their age and location.

Concerns over the safety of pedestrians (including pushchairs, wheelchairs, children and older residents), cyclists and vehicle users, as increased traffic will increase the risk of accidents due to:

- Vehicles approaching the bends use the centre of the road;
- Parked cars forcing vehicles to travel on the wrong side of the road;
- Vehicles speeding around the bends;
- Close incidents between motorists with other vehicles and/or people already documented at present;
- Recollections of previous accidents;
- Pedestrians crossing the road diagonally;
- No footpaths on either side of Brookside Road and the triple, blind bends;
- The proximity of two residential care homes (The Lodge and The Elms), and;
- Restricted access for emergency vehicles around the site and impact on efficiency and speed of emergency services around the area due to increased traffic.

The above bullet points are not covered in the opportunities and constraints.

Lower Road forms part of the national cycle network and is highlighted as a “suggested link route” in the Havant Borough Cycle Network Map 2017.

Existing residents have difficulty accessing their drives at peak times.

In response to the Local Plan Housing Statement, residents arranged a film activity on the Lower Road bends; this showed peak movements occurring in the weekday evenings with numbers approaching the capacity identified for a “shared roadway” in Manual for Streets. Once movements exceed 100vph, the shared nature of the such streets no longer works well.

Vehicles are forced to turn left out of Nursery and Brookside Roads and go around the mini-roundabout in order to travel east of Havant Town Centre.

Brookside, Bedhampton and Bedhampton Hill (B2177) Roads are difficult junctions at present; development will cause greater congestion and queues around the Rusty Cutter roundabout, Broadmarsh junction and the A3(M).

The mini-roundabout cannot take more than one car and the filter lane to turn right into Brookside Road only has capacity for two to three cars; greater traffic will cause queues onto the mini-roundabout.

Concerns that greater congestion along the above roads will lead to Kingscroft Lane and Brookside Road also becoming congested as drivers will seek shortcuts.

Concerns over the increased air pollution.
Concerns over the environmental impact of heavy good vehicles during construction; statements that reverberations are felt along Bedhampton Hill Road at present.

Comments that the current excavation/water works along Lower Road have caused disruption.

Comments regarding the disruption caused by large trucks on the road and parked on verges during the implementation of the recent permission at 11 Lower Road. The workers ignored the rules applied to the Old Bedhampton Conservation Area.

The need to mitigate transport impacts (Paragraphs 4.31 and 4.41, along with Criterion b) of Policy IN3 of the Draft HBLP 2036) would be difficult for both H15 and H22.

Suggestion to identify an alternative access to the site, along with additional traffic lights and calming measures (i.e. speed bumps).

Speed markings on the roads are now fading/partially obscured.

Claims that access to the site, including surveys, have already been completed and approved.

Objection to the requirement of a Travel Plan (Criterion a.viii) due to limited amount of movement to be generated by the proposed site, the existing availability of public transport in the locality and the limited scope for further enhanced travel by non-car means beyond the site boundary.

HBCs proposed way forward for Regulation 19 HBLP2036

The Council is aware of the site constraints but has had to consider the site allocation given the high housing need. Nevertheless, the Council will further consider the suitability of the site for development, particularly regarding highways and heritage.

The Draft Local Plan indicates there are sufficient sites to accommodate the need for housing together with a reasonable buffer. This would not change if this site (and others where the principle of residential development is being further considered) is not allocated. On this basis, it is appropriate to further consider the principle of residential development on this site after further discussion with the relevant statutory stakeholders has taken place.

Notwithstanding the above, if the allocation is to still proceed in the future, consider whether the policy should be amended to:

- Include a reference to nearby listed buildings in the Site Opportunities and Constraints
- Include a requirement that mitigation will need to be provided in line with Policy E18 if Bechstein’s bat is present on the site
- Include a requirement that development should not compromise access to the agricultural bridge
- Include in the site opportunities and constraints that there is an opportunity to provide a link between the site and Havant Footpath 30
- Include a requirement that a contribution is paid towards enhancing Havant Footpath 30
- State that any adverse impact on the SRN is considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013.

As specified in the summary table for proposed Policy E17, the Solent Wader and Brent Goose Strategy (2018) is currently being reviewed and will be published in due course. This will inform the Pre-Submission Local Plan.

The comments raised regarding the surrounding road layout and highway capacity will need to be addressed in a Transport Assessment (TA) and Travel Plan to support any future planning application. As such, consider whether further clarity on the expectations of these assessments is needed and whether more specific details should be included in the Site Opportunities and Constraints section.

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:
The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.

The price of existing property is not a material planning consideration.

The current and future capacity of the local schools, health facilities and utilities have been reviewed as part of the Borough-wide Infrastructure Delivery Plan (IDP).

Langstone Harbour is designated as a SPA, SAC and SSSI; however, it is not designated as an AONB. The only AONB within the Borough is Chichester Harbour.

Historic England (HE) is a statutory consultee and have therefore been consulted on the Draft HBLP 2036; in their response, they have not commented on this site allocation. Their representation is available to view alongside these summary tables.

The emerging Old Bedhampton Character Appraisal, if adopted by the Council, will inform any future allocation policy for this site and will also be considered as a material consideration when determining any future planning application.

The Council has consulted with Hampshire County Council (HCC) as Local Highway Authority on the Draft HBLP 2036.

The small railway bridge is not in the site area, as such there would be no need for an archaeological and heritage assessment.

The PUSH Air Quality Assessment is underway and, when finalised, will inform the local plan regarding appropriate mitigation.

The Council disagrees that the public open space should be in the south part of the site only; the lower density proposed for this site means that open space could be incorporated in both the eastern and western sections in order to provide a landscape buffer between the development and the Old Bedhampton Conservation Area, as well as the railway line.

Plans proposed at pre-application discussions are not necessarily the plans proposed as part of a planning application; in general, proposals will change from the pre-application as the applicant learns more about the site and its context/constraints.

The Council disagrees with the statement that a Travel Plan (Criterion a.viii) would not be required; both a Transport Assessment and Travel Plan will be required to support any future planning application.

The access to the site via a narrow, blind, triple bend with no pavements has been highlighted in the Site Opportunities & Constraints.

The environmental impact of construction will be managed, as far as is possible within the limits of regulations and, where appropriate, using planning conditions.
<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concern over the suitability of the site with regard to access and topography.</td>
</tr>
<tr>
<td>Littlepark Avenue suffers damage to grass verges by heavy vehicles - Question raised as to whether contractors relating to the site will be liable for damage caused.</td>
</tr>
<tr>
<td>Loss of any woodland is regretted but the need for more housing is understood.</td>
</tr>
</tbody>
</table>

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</tr>
<tr>
<td>• A contribution to enhancement of footpath 28 is required</td>
</tr>
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<td>The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:</td>
</tr>
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<td>• Access (IN3)</td>
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</tr>
<tr>
<td>Damage caused to the local highway (including verges) is a matter for the highways authority and is not a matter for consideration in the local plan.</td>
</tr>
</tbody>
</table>
**Summary of comments raised by residents and other stakeholders**

*Please also see comments relating to East Street in the KS1 Havant Town Centre table*

### General

Supportive of regeneration in the area. Closed premises detract from the town centre.

Figure 45 shows the end of East Street and nearby areas, not just the Bear Hotel Car park and East Street.

Needs to be made clearer that this proposal includes East Pallant Car Park.

East Pallant Car Park is not a brownfield site.

Opportunities for achieving more housing at East Street include relocating the Royal Mail sorting office to an industrial site and the council compulsory purchasing nos. 5, 7, 9 & 11 East St and 10a The Pallant.

Havant Footpath 108 and the Shipwright’s Way are located within close proximity of this site. This development would generate additional footfall upon the local rights of way network. HCC therefore request that the allocation include a contribution towards enhancing the local rights of way network, which provides accessible recreational routes to the coastline.

The policy should reference being located in SPZ1/1c for the Havant and Bedhampton springs.

### Character of the area

Concerns over impact on the character of the area.

Any development should be in keeping with the historic character of the area.

Development will obliterate historic gazebo.

Concerns that building homes near the Gazebo garden would make it less visible and negatively impact its setting.

More can be done to preserve and enhance the Gazebo Garden.

Front buildings should be retained.

### Roads/Parking

Concerns over loss of parking, it is well used and required to serve nearby facilities/businesses as well as school pick up/drop off.

Concerns over traffic congestion on local roads.

The station car park is not easily accessible from this direction. More vehicles using Fairfield Road to cross the rail line would create large traffic queues outside the primary school.

Concerns that all new developments will be private roads with parking restrictions further adding to parking issues.

East Pallant is narrow with no suitable access for heavy vehicles.

Existing properties off East Pallant and to the rear of East Street need access for services: emergency vehicles, delivery vehicles, removals vans, dust and waste collection vehicles. The turning area and available space is already restrictive.

More parking needed.

### Infrastructure
Concerns over sewage system and drainage.

Local schools are already oversubscribed.

Concerns over impact on health provision.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether:

- The policy title should be amended for clarity
- A contribution to enhancement of footpath 108 is required
- The policy should reference being located in SPZ1/1c for the Havant and Bedhampton springs

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (including parking) (IN3)
- Heritage (E9)

Comments where no change is considered necessary:

- Hard landscaping, such as for a car park, constitutes development and therefore the land would be considered ‘previously developed’ or ‘brownfield’.
- The plan does not preclude further housing development along East Street, however, sites must be available for development to be included in the Local Plan
- Any planning application would be required to be supported by a Heritage Statement which would address impact on heritage assets. Furthermore, Policy E9 sets out requirements in relation the historic environment.
- The policy requires the listed Buildings to be retained.
- The capacity and future growth of sewage, education and health infrastructure has been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP)
### Summary of key comments raised by residents and other stakeholders

Object to allocation based on:
- Site being in a strategic gap / outside the urban area
- area is currently in agricultural use
- loss of open spaces, countryside and natural habitat
- grade II Listed Buildings and their setting
- mature parkland (on the Hampshire register of Parks and Gardens) which is of great local importance
- protected trees on the site
- Bechstein’s bat on the site
- there is an existing strong landscape boundary, including mature trees and hedgerows
- the site is in Groundwater SPZ 1c for the Bedhampton and Havant springs
- Schools, doctors, local hospital are full to capacity

More suitable sites for development need to be found which will have far less impact on the surrounding environment and have an infrastructure capable of supporting the proposed developments.

Figure of 35 is not justified and is not realistic from a delivery perspective.

Changes should be made to the wording of the policy in relation to the impact on the historic parkland of proposed development to the south.

The text refers to the site’s proximity to a noise sensitive receptor, but provides no further detail.

Extensive survey work carried out to support the planning application revealed that bat activity on the site was relatively low. The text should reflect this.

The text refers to storage tanks formerly/currently present on site. The landowner is not aware of any such former use on site, and it is suggested that this is an error.

It is unrealistic to expect the retention of the protected trees (criterion d) given the number of trees on site and the challenges in bringing forward a viable development that protects and conserves the listed buildings.

The design and layout also requires highways works to the south side of Bartons Road and around the junction of Bartons Road and Horndean Road. This requirement should be more prescriptive regarding the extent of works.

Consideration should be given to the potential to address highway works as part of the wider redevelopment proposals in the area, as suggested in draft policy bullet 15 under Site Opportunities and Constraints.

HCC would expect development at this location to contribute towards high-quality multi-user links to Southleigh Forest and the Southleigh allocation to the south.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments.

In addition, consider whether policy should be amended to:
- Refer more extensively to the historic buildings and historic parkland
- Clarify the noise sensitive receptor
- Clarify the position regarding storage tanks
- Be more specific regarding the required highway works and multi-user links

Comments where no change is considered necessary:
• The protection of trees and protected species is a key planning aim and should remain in the policy; if they need to applicants will have to demonstrate why they cannot meet this requirement.

• Site allocations must indicate an estimated yield. The yield is based on a desktop analysis of site capacity, which is consistent across all the sites in the plan. Indicative yields do not indicate a maximum, and applicants may demonstrate that a higher number is acceptable in planning terms.

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

• Site specific impacts on the local road network (IN3)
• Access (IN3)
• Ecology (E15)
• Woodland, trees, hedgerows, TPOs (E15)
• Aquifer Source Protection Zones (E22)
• Landscape and Townscape (E10)

The following matters raised are considered in detail through the draft IDP:

• Education
• Health Care
<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>A replacement site plan has been submitted.</td>
</tr>
<tr>
<td>Reference planning permission for temporary open storage use.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HBCs proposed way forward for Regulation 19 HBLP2036</th>
</tr>
</thead>
<tbody>
<tr>
<td>No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments.</td>
</tr>
<tr>
<td>In addition, consider minor wording changes and revised site boundary submitted.</td>
</tr>
</tbody>
</table>
**Summary of key comments raised by residents and other stakeholders**

Objection to the site being developed for housing as it is unsuitable.

The site is outside of the urban area (Policies AL2 and CS17 of the Adopted Local Plan) forming a strategic green gap; development will lead to urban sprawl and set a precedent for further development.

Development would result in the loss of open spaces, countryside and natural habitats.

The site is currently in agricultural use.

The site is close to East Leigh House which is a Grade II listed building.

The site contains two Tree Preservation Orders (TPOs).

There is the possibility that bats (including the protected Bechstein’s bat) forage and/or roost on the site.

The hospital and local schools are at full capacity and are unable to handle the estimated number of people from sites H17, H21, H25 and H27.

Support for the site being developed for housing.

Suggested wording change to paragraph 6.123 regarding greenfield/brownfield classification as the site is a residential dwelling and its curtilage. Residential curtilage in the countryside are classified under the NPPF as brownfield land; see Dartford Borough Council v Secretary of State for Communities & Local Government (CO/4129/2915).

Suggestion that the site could accommodate more than 15 dwellings.

Suggestion that a quarter of the site could be used for a care home.

The landowner has no knowledge of landfill on the site.

The landowner has been agreeing the principles of a joint access road and drainage with the owners of the adjoining site (which has the benefit of planning consent).

Suggestion that the development should contribute towards high-quality multi-user links to Southleigh Forest and Southleigh (KS5).

**HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to:

- Include a requirement that high-quality multi-user links are established from the site to surrounding sites which provide clear routes to Southleigh (KS5) and Southleigh Forest.
- Include a reference to East Leigh House in the design and layout requirements (the listed building has only been referenced in the Site Opportunity and Constraints so far)
- Delete the reference that the site is greenfield and replace with alternative wording, such as “this is large housing in substantial grounds” rather than brownfield
- Include a care home and/or greater dwelling capacity

The following detailed matters are for consideration at the planning application stage and are covered by policies in the Local Plan:

- Protected Species (E18)

Comments where no change is considered necessary:

- The site is not in agricultural use; the site consists of a large house and its outbuildings (now converted into five flats) along with its curtilage
The two TPOs, and the possibility of Bechstein’s bat, have been highlighted in the site’s opportunities and constraints (page 224) and have been referenced as part of the developer requirements.

The Council is proposing a renewed approach to the regeneration of brownfield land; however, it will not be possible to meet the Borough’s housing needs from brownfield and greenfield sites in the Borough’s existing urban boundary (Policies AL2 and CS17) alone. Therefore, sites outside of the existing urban area have had to be considered for development. This was addressed in the consultation on the Local Plan Housing Statement in 2016.

The established network of natural habitats in the Borough will be outlined as part of the review on the Havant Borough Biodiversity Action Plan (BAP) which will be available in due course.

The current and future capacity of the local schools and health facilities have been reviewed as part of the Borough-wide Infrastructure Delivery Plan (IDP).
### Summary of key comments raised by residents and other stakeholders

#### Comments about Hayling Island infrastructure - please see table on ‘Hayling Island (General)’.

- **Object to the on-site open space requirement including community growing provisions (e.g. allotments).**
- **The allocation will result in a net increase of 45 dwellings - need to account for net loss of 5 dwellings.**
- **Object to demolition of existing houses to enable development.**
- **Loss of greenfield site / greenspace.**
- **Property owners bought their properties on the promise that the amenity land would never be built on.**
- **Concerns in relation to access / disturbance to residents.**
- **Loss of green / natural space - used by wildlife, dog walkers, for ground water storage.**
- **Loss of ecology, habitats and protected species including Brent Geese.**
- **The site is very close to a core site for migrating birds - concerns in relation to potential disturbance.**
- **Site should not be included until evidence base is complete.**
- **TPO areas, trees and hedgerows should be protected.**
- **Fathoms Reach is narrow and twisty and is a hazard to both motorists and pedestrians.**
- **Potential for archaeology.**
- **Flood risk and increase of flooding elsewhere.**
- **Concern that developer will not implement the scheme in accordance with approved details.**

HCC supports criterion (d) (iii) of this policy. HCC would also expect this development to enhance Havant Footpaths 90, 93 and 94 which provide a sustainable travel link between St Mary’s Road, Manor Road and Church Road.

All of the site allocations are small scale and therefore unclear how any improvements identified on the A3023 will be secured and delivered given the impact of each individual site is likely to be less than the cumulative impact.

Delete reference to ‘using the Hayling Island microsimulation model’ following Transport Assessment in site requirements because all proposed allocations will have already been included in the HBC microsimulation model runs to 2036. There is not a need for the developer to run the model again for the same site allocation. Query whether developer can be required to use a specific transport model.

### HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and in the Langstone area. At this stage, no site-specific matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The policy as proposed in the regulation 18 draft should proceed, with wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses.

In addition, consider how the policy may be amended to take account of the following:

- A review of the site capacity and consider whether it should be adjusted to take account of the net loss of existing dwellings (5)
- The proposed approach to the on-site provision of open space (E2) including the site threshold.
• The presence of a stream bounding the north and eastern boundaries should be referenced in the Site Constraints and Opportunities
• The site’s location adjacent to a Core Area for Brent Geese and Waders (E17) should be referenced in the Site Constraints and Opportunities
• The addition of a requirement for a developer contribution towards the improvement of the above development where necessary in order to mitigate the impact of the development

The Council will further consider its proposed approach to applicants using the microsimulation model in preparing site-specific Transport Assessments.

The following detailed matters are for consideration at planning application stage:
• Access (IN3)
• Site specific impacts on Fathoms Reach (IN3)
• Residential amenity (E6 / E20)
• Ecology (E15)
• TPO areas, trees and hedgerows (E15)
• Archaeology (E9)
• Flood risk and drainage (E12 / E13)

Further evidence required:

Once the borough-wide Transport and Hayling Island Highway and Transport Infrastructure Assessments are completed, the draft IDP will be updated to reflect and incorporate the recommendations from the transport analysis. This will inform the Regulation 19 version of the Plan.

Comments where no change is considered necessary:

Whilst it is necessary to demolish a number of existing residential properties to provide access to the site, the site will make a significant contribution to the supply of new homes.

The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.

It is noted that property owners may have been assured by a previous landowner that the land would never be built upon. The current landowner of the site has however, since promoted the land for housing development.

The site is adjacent to a Core Area for Brent Geese and Waders as defined by Policy E17. A project level Habitats Regulation Assessment to inform any package of avoidance and mitigation measures has therefore reflected in the site requirements in the policy.

The site is located within Flood Zone 1, an area with less than 1 in 1000-year annual probability of sea or river flooding - concerns raised in relation to flooding are likely to be in relation to surface water flooding due to the presence of the stream along the north and eastern boundaries of the site. As above, an appropriate drainage strategy as part of any proposed development would be secured in accordance with the requirements of policy E12.

The implementation of an approved scheme is not a matter for the Local Plan but is dealt with by the development management process.
### Summary of key comments raised by residents and other stakeholders

#### Comments about Hayling Island infrastructure - please see table on 'Hayling Island (General)'.

<table>
<thead>
<tr>
<th>Issues in relation to the public footpath:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Impact on public viewpoints - adjacent to the AONB</td>
</tr>
<tr>
<td>• Well used by children, elderly, visitors, tourists, and dog walkers</td>
</tr>
<tr>
<td>• Used as a route to local schools and college</td>
</tr>
<tr>
<td>• Health and wellbeing</td>
</tr>
<tr>
<td>• Maintain character and nature of footpath</td>
</tr>
</tbody>
</table>

Loss of greenfield site - brownfield sites should be developed first, loss of horse grazing paddock.

Impact on the character / identity of the area - there has been enough development within South Hayling.

Loss of greenspace / opportunities for recreation.

Impact on the local road network.

Safety of access - proximity to bend on Selsmore Road/Salterns Lane.

Concerns in relation to flood risk and drainage - run off from adjacent farmland, high water levels, waterlogged land. Photographs submitted.

Pollution risk to aquifer.

Presence of sewers in this location.

Concerns in relation to sewers including road works and maintenance of pumping station.

Impact on Brent Geese and Waders - recreational disturbance to the harbour. Photograph submitted.

Loss of habitats, wildlife corridors and protected species.

Proximity to Ramsar site.

Mature Oak trees on the site should be protected - replacement would not be acceptable.

Reference to the Site’s Opportunities and Constraints.

<table>
<thead>
<tr>
<th>Residential amenity issues:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Loss of outlook</td>
</tr>
<tr>
<td>• Additional noise and disturbance associated with traffic</td>
</tr>
<tr>
<td>• Potential for light pollution</td>
</tr>
<tr>
<td>• Impact on quality of life</td>
</tr>
<tr>
<td>• Residential home backs onto the plot</td>
</tr>
</tbody>
</table>

Concerns in relation to the AONB:

<table>
<thead>
<tr>
<th>Concerns in relation to the AONB:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Loss of views</td>
</tr>
<tr>
<td>• Need to provide green buffer</td>
</tr>
<tr>
<td>• Threat of development</td>
</tr>
<tr>
<td>• Environmental impact during construction</td>
</tr>
<tr>
<td>• Ecological importance of mudflats</td>
</tr>
<tr>
<td>• Support ‘respond to the site’s sensitive landscape location, in particular the setting of the AONB’ criterion</td>
</tr>
</tbody>
</table>

Capacity of the site should be reduced.

Concern that developer will not implement the scheme in accordance with the approved details.

The policy and supporting text do not acknowledge the impact of climate change on the site, which causes flood extent to increase significantly beyond the present-day Flood Zones. You should be satisfied this will not compromise the ability of the site to safely accommodate the number of dwellings proposed.
HCC requests the retention of Havant Footpath 102 which runs along the western boundary of this site. In addition, there is an aspiration to upgrade the footpath to a multi-user route to provide a safe route to Mengham Junior School. HCC therefore request that this allocation provides a developer contribution towards this.

All of the site allocations are small scale and therefore unclear how any improvements identified on the A3023 will be secured and delivered given the impact of each individual site is likely to be less than the cumulative impact.

Delete reference to ‘using the Hayling Island microsimulation’ following Transport Assessment in site requirements because all proposed allocations will have already been included in the HBC microsimulation model runs to 2036. There is not a need for the developer to run the model again for the same site allocation. Query whether developer can be required to use a specific transport model.

**HBCs proposed way forward for Regulation 19 HBLP2036**

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage.

No site-specific matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. However, given that the impact of climate change means that the extent of present day Flood Zones are expected to increase significantly, flood risk constraints will be considered further through Phase 2 of the Strategic Flood Risk Assessment (SFRA). The policy as proposed in the regulation 18 draft should proceed, with wording changes and revisions to reflect and incorporate the recommendations from the transport analyses and the SFRA. In addition, consider the following:

- Subject to overwintering surveys in 2018/19 to establish whether SPA birds use the site, the inclusion of relevant policy criteria according to the level of impact on Solent Waders and Brent Geese, including the need for any mitigation in line with policy E17.
- Include reference to retention of existing footpath (102) which runs along the north-eastern edge of the site boundary. Also reference the opportunity to enhance this route in the Site Opportunities & Constraints, and consider whether a developer contribution to improve this route is necessary in order to make the development acceptable in planning terms.
- Examine the presence of sewers/ sewer lines in this location and investigate the implications for the site capacity.
- Investigate the quality and value of the mature oak trees on the site. Policy E15 also requires the development to be informed and influenced by the presence of trees and woodlands on the site.

The following detailed matters are also considered at planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (IN3)
- Access (IN3)
- Ecology including Ramsar designation (E15)
- Flood risk and drainage (E12 / E13)
- Residential amenity (E6 / E20)
- Aquifer Source Protection Zones (E22)

The Council will further consider its proposed approach to applicants using the microsimulation model in preparing site-specific Transport Assessments.

Comments where no change is considered necessary:

The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.
The loss of a view is not a material consideration in decision-taking.

The implementation of an approved development is not a matter for the Local Plan but is dealt with by the development management process.
### Summary of key comments raised by residents and other stakeholders

#### Impact on the AONB:
- **Object to allocation**
- **Site occupies a highly visible promontory within Chichester Harbour AONB.**
- **Buildings would be intrusively visible**
- **early consultation with Natural England and the Chichester Harbour Conservancy should take place to identify whether the landscape and ecological sensitivities can be addressed**
- **Key factor affecting the impact on the AONB is the scale of the development**
- **The principles of the required mitigation should be fully considered prior to the site’s allocation.**
- **Paragraph 116 states that planning permission should be refused for major developments in AONBs except in exceptional circumstances and where it can be demonstrated they are in the public interest. The circumstances here are not exceptional or in the public interest.**
- **Recreational usage will adversely impact the landscape, scenic beauty and wildlife habitats**

#### Impact on wildlife:
- **Site is adjacent to Ramsar site and SSSI**
- **Policy appropriately highlights that this site is immediately adjacent to the SPA**
- **Policy appropriately highlights the proximity of sites identified in the Solent Brent Goose and Wader, but update of the Solent Brent Goose and Wader Strategy (2017) should be used for most up to date data, to meet requirements of criteria (e) and (m)**
- **Object to allocation on basis of ecological impacts on the various international, European and national nature conservation designations which surround the site; development would result in a significant increase in recreational disturbance, which would require significant mitigation and avoidance measures**
- **Development here would lead to disturbance during construction and recreational disturbance during occupation; suggestion that this could not be mitigated adequately to conserve the integrity of designated sites.**
- **Criteria e and i are currently the same; one should be changed to refer to the need to adhere to Policy E16 on disturbance mitigation**
- **Setting back the buildings (Criterion d.ii) would not necessarily help reduce disturbance - it would depend what was between the property and the foreshore. Best deterrent to use of the foreshore would be thick planting.**

#### Loss of current uses (leisure and marine employment):
- **Loss of amenities / 40 houses at Northney Marina must impact on the primary function and operation of the site for marina purposes.**
- **Object based on / concerned about the potential loss of marine employment (see Conservancy’s Planning Principle PP02 ‘Safeguarding Marine Enterprise’, together with the Marine South East report ‘Chichester Harbour Marine-related Business Evaluation (2013))**
- **Concerned about the potential loss of access by other water users**

#### Flood Risk:
- **Access to Northney Marina is at risk from flooding**
- **At Sparkes, the scope of development must be limited to repairs and sensitive flood protection**
- **Sparkes Marina: Any improvements planned to the sea walls may require a Flood Risk Activity Permit, and will need to be considered strategically in conjunction with other planned improvements in the vicinity**
- **The site lies in FZ1, but due to the susceptibility of the site to sea level rise, a progressively greater proportion of the site is at a high probability of flooding over the next 100 years. The Access is in FZ3. It may be possible to implement mitigation measures on site, using a combination of the sequential approach, land raising, construction of sea walls and building design, to manage risk to an acceptable level. It is, however, very likely that the site will be inaccessible during high tides.**
The identified constraints and opportunities are acknowledged, and it is believed that the policy strikes a sensible and pragmatic balance between retaining and enhancing both marinas and making more efficient use of these brownfield sites.

Ground at Northney is largely dumped infill, and would need much remedial work to ensure trees were able to grow and survive.

Question the logic of the argument that the development would fund the refurbishment of the marina and repairs to the sea wall at Sparkes Marina.

Any building will cost a small fortune - it’s an upmarket prime building site.

Traffic issues at both sites - access via narrow residential streets to Sparkes Marina particularly of concern.

HCC would like to see a footpath between Northey Marina and the surrounding rights of way and permissive network.

Support inclusion of policy H30 in the Plan.

HBCs proposed way forward for Regulation 19 HBLP2036

The Council is aware of the site constraints but has had to consider the site allocation given the high housing need. Nevertheless, the Council will further consider the suitability of the site for development, particularly regarding the impact on the AONB, the Chichester & Langstone Harbours SPA and flood risk.

The Draft Local Plan indicates there are sufficient sites to accommodate the need for housing together with a reasonable buffer. This would not change if this site (and others where the principle of residential development is being further considered) is not allocated. On this basis, it is appropriate to further consider the principle of residential development on this site after further discussion with the relevant statutory stakeholders has taken place.

Nonetheless, should the allocation in principle move forward, these matters (impact on AONB, impact on SPA, flood risk) will be revisited to inform any detailed changes which should take place to the policy text.
Summary of key comments raised by residents and other stakeholders

### Comments about Hayling Island infrastructure - please see table on ‘Hayling Island (General)’.

**Concerns over flooding and drainage:**
- Water logged during the winter months / sustained period of bad weather
- Question effectiveness of flood devices which are designed to monitor flooding
- Site marginally above the Spring Tides high level water line
- Tidal movement below the surface which means that soakaways do not function
- The Billy trail restricts water distribution acting as an inland dam
- Development will potentially push surface water to the west and south towards existing properties.

**Within an area subject to coastal erosion / close to foreshore which is not protected from sea egress**

**Issues in relation to the proposed SuDs solution:**
- Concern in relation to pumping station and its maintenance and how the costs for this will be met
- Presence of mosquitos with large bodies of stagnant water
- Treatment of water with insecticide and related health concerns, given concerns at the Goldring Close development
- Concerns in relation to pollutants and related impact on wildlife
- SUDS need to be elevated above ground and water pumped to it, within the northern part of the site.

**Concerns in relation to Brent Geese:**
- Loss of a Primary Support Area
- Site should be categorised as a Core Area - concern that bird scarers were used to influence the results of surveys
- Site part of the mitigation strategy for the Oysters development - should be continually used for crop rotation to prove for the foraging and roosting of Brent Geese
- Fence has not been maintained to prevent dogs from disturbing wildlife - previously reported as a breach of an agreement by that developer.
- An appropriate mitigation solution should be secured in accordance with Policy E17

**Impact on ecology and protected species.**

**Adjacent to AONB, SPA, Ramsar and SSSI.**

**Loss of grade 2 agricultural land / impact on the viability of the farm.**

**Loss of open space / area and views to the countryside - should be for all to enjoy not the chosen few.**

**Mains water pressure low.**

**Inadequate parking for non-resident vehicles.**

**Concern in relation to extra traffic going through West Lane / existing residential area.**

There has been a significant increase in the amount of traffic on Manor Road - queues can last for several hours during the summer and school holidays.

Proposed development will cause most travellers to use West Lane which is a narrow country lane with hidden bends. It was never designed to cope with the proposed level of traffic.

**Concerns in relation to highway safety:**
- Single access crosses a pedestrian pavement on Sinah Lane,
- Roads and pavements to West Town and schools are narrow / do not have pavements
- Access would be via a single relatively narrow access between existing properties

There is no need for the development - the Oysters development has still not sold out. Developers should be challenged to develop existing sites where they have permissions first.
Development will not meet local housing need - questionable as to whether first time buyers will be able to afford the price.

Just because landowner wants to sell field it does not automatically make the land suitable for development.

Design of houses does not cater for large retired community customer base.

Proposed development out of character with the area - concern in relation to high proportion of terraced and semi-detached houses at a density of over 30 dwelling per hectare.

Query what type of properties are to be built in the Station Road area

Limited facilities and services in West Town - cannot cope with proposed 160 houses in Sinah Lane.

Potential for archaeology - Roman remains used in the construction of St Marys

There are no heritage assets within the site - a Heritage Statement is not required.

The Council should not insist on the use of the microsimulation model until it has been finalised, appropriately consulted upon and found to be robust.

All of the site allocations are small scale and therefore unclear how any improvements identified on the A3023 will be secured and delivered given the impact of each individual site is likely to be less than the cumulative impact.

Delete reference to ‘using the Hayling Island microsimulation’ following Transport Assessment in site requirements because all proposed allocations will have already been included in the HBC microsimulation model runs to 2036. There is not a need for the developer to run the model again for the same site allocation. Query whether developer can be required to use a specific transport model.

No early years or related infrastructure has been included.

HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage. No site-specific matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The policy as proposed in the regulation 18 draft should proceed, with minor wording changes, and revisions to reflect and incorporate the recommendations from the transport analyses.

Part of the mitigation proposal for the Oysters site was to repair the broken fence line along the eastern side of H34C to prevent local residents walking their dogs through the field and disturbing geese. As such, there will be a requirement for any pedestrian and cycle route to take account of the potential disturbance to birds during the winter months. This should be possible provided the pedestrian and cycle route does not adjoin or pass through land to the north of the allocation site (H34C), and thereby avoiding potential disturbance to birds.

The Council will further consider its proposed approach to applicants using the microsimulation model in preparing site-specific Transport Assessments.

The following detailed matters are for consideration at planning application stage:

- Surface water, SuDs and drainage (E12) and associated maintenance (IN3)
- Solent Brent Goose and Waders (E17), as above.
- Ecology and protected sites (E15)
- Highway safety and parking (IN3)
- Design and layout (E6)
- Housing density and mix (H3)
The capacity of water supply, health and community facilities are considered in detail though the draft IDP.

Comments where no change is considered necessary:

The site is grade 3a agricultural land. When considering which greenfield sites are suitable for allocation, the council has sought to prioritise sites of a lower agricultural quality. However, the available evidence is that the majority of land in the borough is of the best and most versatile quality (BMV). Therefore, the allocation of housing sites on BMV is unavoidable if the borough is to meet its housing need. In order offset the loss of BMV, the policy identifies a need for the development to include community growing provisions such as allotments as part of the open space provision.

The Council considers that Hayling Island is adequately served by services and facilities, albeit further provision could help to serve the community.

In meeting the borough’s housing needs, policies H2 and H3 set out the Council’s approach to securing homes of the right size and tenure, whilst Policy E7 sets out how the Council will secure suitable homes for a wide range of occupants.

Concerns raised in relation to surface water flooding due to the complex drainage system and coastal change referenced in the Site Constraints and Opportunities. Whilst an Area of Coastal Change (as defined by E14) lies immediately north of the end of North Shore Road, the site itself is not considered to be vulnerable to coastal change.

Detailed matters in relation to SuDs, including concerns in relation to mosquitos and the use of insecticides, would be considered as part of any management plan and any associated management regime. As above, the Draft Local Plan includes a policy (IN4) sets out the proposed approach to the sustainable management and maintenance of such ‘common parts’.

The site does not form part of the mitigation strategy for the Oysters development. Further overwintering surveys will confirm the intensity of the use of the northern part of H34c relative to the south (which includes the site allocation). In this respect, the developer will be required to provide suitable mitigation to the north of the allocation site in line with the site requirements and Policy E17. A comprehensive strategy for the creation of a Brent Goose refuge on the western side of Hayling Island will be considered further through the Council’s emerging Biodiversity Strategy.

There is potential for previously unidentified archaeology of prehistoric and Roman date to be present on the site.

The capacity and future growth of early years infrastructure is considered through the Borough-wide draft IDP.
Summary of key comments raised by residents and other stakeholders

Comments about Hayling Island infrastructure - please see table on ‘Hayling Island (General)’.

Proposes amendment to extend site allocation boundary.

Concerns in relation to the AONB:
- Impact on its setting
- Southern part of the site could form landscape buffer
- Impact on views from the public footpath
- Not possible to mitigate the impact of development

Set a precedent for development on land to the north.

Impact on Brent Geese and Waders:
- Reduced foraging options
- Need to protect these areas
- Disturbance to the SPA could not be adequately mitigated

Natural England supports policy requirement that mitigation for the Solent Waders and Brent Geese is provided upfront, prior to development and to the satisfaction. Mitigation is also required to address the indirect impacts on nearby Solent Wader and Brent Goose sites.

Concerns over flood risk and drainage:
- Soakaways have not had any effect on flooding
- Existing watercourses would find it difficult to cope
- Fields/areas around the Eastwood Close/Tournerbury Lane junction subject to flooding

Issues in relation to Tournerbury Lane/Church Lane junction:
- Over capacity with existing traffic
- Splayed junction does not lend itself to traffic light control
- Congestion exacerbated by delivery lorries to the Co-Op
- Additional traffic from the Halyards and Hayling Billy sites

Impact on protected species and habitats.

Archaeological potential.

Question whether social rented housing should be included.

Loss of greenfield site - brownfield sites could be developed first.

Storage of materials and builder’s lorries and contractor parking will be an issue.

HCC support criterion (d) (iv) of this policy. There is an aspiration to upgrade Havant Footpath 88 to a multi-user route providing a sustainable travel link to the schools to the north.

All of the site allocations are small scale and therefore unclear how any improvements identified on the A3023 will be secured and delivered given the impact of each individual site is likely to be less than the cumulative impact.

Delete reference to ‘using the Hayling Island microsimulation’ following Transport Assessment in site requirements because all proposed allocations will have already been included in the HBC microsimulation model runs to 2036. There is not a need for the developer to run the model again for the same site allocation. Query whether developer can be required to use a specific transport model.

HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains
uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable
development on Hayling Island and the Langstone area at this stage. No site-specific matters have been
raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The policy
as proposed in the regulation 18 draft should proceed, with minor wording changes, and revisions to reflect
and incorporate the recommendations from the transport analyses.

In addition, consider the following:

- Examine whether the site allocation boundary should be amended to reflect amended site plan
  submitted by the landowners' agent, including the opportunity to provide a buffer to the setting of the
  AONB.
- Reference opportunity to enhance footpath on the western boundary of the site in the Site
  Opportunities and Constraints.
- Whether there is a need to include a requirement for a developer contribution towards the indirect
  impacts on nearby Solent Wader and Brent Goose sites.

The Council will further consider its proposed approach to applicants using the microsimulation model in
preparing site-specific Transport Assessments.

The following detailed matters are for consideration at planning application stage:

- Brent Geese and Waders (E17)
- Flood risk and drainage (E12)
- Site specific impacts on the local road network (IN3)
- Ecology (E15)
- Archaeology (E9)

Comments where no change is considered necessary:

Policy E10 sets out the exceptional circumstances in which the Council will permit development outside of
the defined settlement boundaries (Figure 18) which will be refined further through the Regulation 19 version
of the HBLP2036. Should the Council decide to amend the site boundary as per the submitted site plan, this
will be publicised through the Pre-submission consultation.

Affordable housing should be secured as part of market housing-led schemes in accordance with policy H2
to achieve a mixed and balanced community.

The council has considered sites across the borough for allocation. Given the high housing need, it is not
possible to avoid greenfield allocations.

Details of construction and associated arrangements are generally dealt with by the development
management process.
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
<th>Implications/Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Support for the development.</td>
<td>The loss of trees, hedgerows and other green infrastructure has a detrimental effect on the landscape and wildlife. This creates a negative impact on the unspoilt nature of Hayling Island.</td>
</tr>
<tr>
<td>A mature tree has recently been felled.</td>
<td>Development of the site will result in the loss of agricultural land.</td>
</tr>
<tr>
<td>Insufficient weight has been given to infrastructure constraints - particularly road infrastructure.</td>
<td>The access to the site will be on a narrow B-road which is used by nursery children and elderly people visiting the church.</td>
</tr>
<tr>
<td>The density of the site proposed development is too high and should be halved.</td>
<td>A multi-user access route between Manor Road and West Lane should be provided.</td>
</tr>
<tr>
<td>Delete reference to 'using the Hayling Island microsimulation model' following Transport Assessment in site requirements because all proposed allocations will have already been included in the HBC microsimulation model runs to 2036. There is not a need for the developer to run the model again for the same site allocation. Query whether developer can be required to use a specific transport model.</td>
<td></td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage. No site-specific matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The policy as proposed in the regulation 18 draft should proceed, with wording changes and revisions to reflect and incorporate the recommendations from the transport analyses. In addition, consider whether:

- A multi-user access route should be required to link Manor Road and West Lane

The Council will further consider its proposed approach to applicants using the microsimulation model in preparing site-specific Transport Assessments.

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (IN3)
- Access (IN3)
- Ecology (E15)
- Woodland, trees, hedgerows, TPOs (E15)

Comments where no change is considered necessary:

- The allocated density of the site is in line with Policy H3 which seeks to ensure efficient use of land for development
- When considering which greenfield sites are suitable for allocation, the council has sought to prioritise sites of a lower agricultural quality. However, the available evidence is that the majority of land in the borough is of the best and most versatile quality (BMV). Therefore, the allocation of housing sites on BMV is unavoidable if the borough is to meet its housing need
### Summary of comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed amendment to site boundary to include land to the north which could be used to help facilitate on site open space and ecological mitigation.</td>
</tr>
<tr>
<td>No early years or related infrastructure has been included.</td>
</tr>
<tr>
<td>Site should provide a multi-user link to Bridleway 121 and to Calshot Road.</td>
</tr>
<tr>
<td>Request that a contribution is paid to Hampshire County Council (HCC) towards enhancing the nearby Staunton Country Park to mitigate for increased recreational pressure.</td>
</tr>
<tr>
<td>There needs to be some text or new heading before this allocation as it is not on Hayling island but follows on directly from the Hayling sites.</td>
</tr>
<tr>
<td>Also need to check that the site meets the highway boundary.</td>
</tr>
<tr>
<td>Given the proximity of the site and its potential impact on the SRN, either individually or cumulatively, it is requested that any potential adverse impacts to the safe and efficient operation of the SRN be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.</td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft. In addition, consider the following:

- Investigate proposed site extension further. If site extension is deemed appropriate, then some minor wording changes will be necessary.
- Whether the policy should be amended to require links to Bridleway 121 and to Calshot Road
- Whether the policy should be amended to add to the developer requirements that a contribution is paid towards enhancing the Staunton Country Park in line with HCC’s request
- State that any adverse impact on the SRN is considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013
- Check site meets the highway boundary.

Comments where no change is considered necessary:

The capacity and future growth of early years infrastructure has been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP).
### Summary of key comments raised by residents and other stakeholders

- Welcome development of 90 homes and employment space.
- Social housing supported.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments.
**Summary of key comments raised by residents and other stakeholders**

- No objection to the land being developed in principle.
- Objection to the site being developed into a waste landfill site.
- Support for the proposed allocation.

In 2006, residents who moved into the surrounding Proctor & Gamble redevelopment were informed that the site would be used for a GP surgery and nursery. Suggestion to build a new GP and/or dental surgery instead of residential dwellings.

The estate is "like a concrete stranded whale as it is".

- Objection to high-rise development of any kind.
- Suggestion that any buildings over two storeys are situated closest to Dunsbury Way, along with any development near Little Hackets to be orientated to the side or opposite direction of the existing dwellings, as to not overshadow or overlook existing properties.
- Suggestion for the provision of affordable housing to be situated along Dunsbury Way.
- Support for retirement homes; preference for privately-owned retirement dwellings.
- Observations of wildlife on the site, i.e. foxes, birds and bats.
- Observation of noise pollution at present (i.e. working man’s club).
- Observation of anti-social behaviour at present.
- Concern over medical impact the development would have on the community.
- Concern that 70 dwellings is too much for the size of the land.
- Questions raised by the landowner over the extent of the proposed boundary; recommendation to check for accuracy on the north-east side.
- Request that a contribution is paid to Hampshire County Council (HCC) towards enhancing the nearby Staunton Country Park and Havant Footpath 502 to mitigate the increased recreational pressure.

**HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The Council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. The policy should be amended to:

- Show the correct boundary, as stated by the landowner, in Figure 58.

In addition, consider whether the policy should be amended to:

- Include the requirement of a developer contribution (paid to HCC) for the enhancement of Staunton Country Park and Havant Footpath 502.

The following detailed matters are for consideration at the planning application stage and are covered by policies in the Local Plan:

- High Quality Design (E6) regarding reduced opportunities for anti-social behaviour, along with density, scale and appearance of development in respect of the surrounding area
- Ecology (E15) regarding wildlife observed on site
- Amenity and Pollution (E20) regarding noise pollution
- Affordable Housing (H2)
- Housing Density and Mix (H3)
Comments where no change is considered necessary:

- The land is not proposed for the development of a waste landfill site
- GP provision and future growth have been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP)
- Affordable housing should be evenly spread across a site and integrated with the rest of the development (in line with Policy H2)
- Retirement housing products also need to provide affordable units in line with Policy H2
Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Support for allocation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Has been previous permission from Government for re-provision of statutory (but unused) allotments. This was as an extension of Stockheath allotments (south of the site). As such, policy should be updated to state that allotments could be provided wholly or partly of-site in the vicinity of the development.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Loss of biodiversity.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land contaminated with asbestos.</td>
</tr>
<tr>
<td>Local issues with foul water drains.</td>
</tr>
<tr>
<td>Riders Lane South very narrow with unsafe turning onto Purbrook Way</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HBCs proposed way forward for Regulation 19 HBLP2036</th>
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<tr>
<td>No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider the following:</td>
</tr>
<tr>
<td>• Whether replacement allotments could be provided close to the site</td>
</tr>
<tr>
<td>• Whether the policy should include specific reference to asbestos contamination</td>
</tr>
<tr>
<td>The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:</td>
</tr>
<tr>
<td>• Ecology (E15)</td>
</tr>
<tr>
<td>• Drainage (E13)</td>
</tr>
<tr>
<td>• Transport mitigation (IN3)</td>
</tr>
</tbody>
</table>
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supportive of revised mixed-use allocation (reflecting the strong commercial interest in the site).</td>
</tr>
<tr>
<td>Request flexibility within the policy to allow for other employment generating uses and/or housing – need to allow flexibility for a variety of economic development to come forward to create further jobs. Suggested changes to the criteria in the policy to reflect this.</td>
</tr>
<tr>
<td>Allowing non-housing uses coming forward on the site would not lead to adverse implications in respect of five-year land supply or in meeting the overall housing need over the Plan period.</td>
</tr>
<tr>
<td>Non-housing uses on this longstanding employment site would sit better with the proposed builders’ merchant.</td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider whether the policy should be amended to include:

- An allocation wholly for employment purposes (Classes B1, B2 and B8) including the builders merchant) considering whether such an allocation is likely to be more deliverable than for a mixed-use allocation.

As part of this, it will be necessary to further investigate the site’s potential contribution to the development needs of the area.

Comments where no change is considered necessary:

As currently defined within the NPPF, 'economic development' includes those within B Use Classes, public and community uses, and main town centre uses (but excluding housing development). It is therefore considered that an allocation for ‘economic development purposes’ would result in an overly permissive site allocation. As above, however, it is considered appropriate to consider whether the site should be allocated wholly employment purposes.
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>The policy is supported and no modifications are suggested.</td>
</tr>
<tr>
<td>Amend the reference in the Site Opportunity &amp; Constraints to state that site is in SPZ 1g for Havant &amp; Bedhampton Springs.</td>
</tr>
<tr>
<td>Request that a contribution is paid to Hampshire County Council (HCC) towards enhancing the nearby Staunton Country Park to mitigate for increased recreational pressure.</td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to include a contribution towards enhancing the Staunton Country Park in line with HCC’s request.
<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>The site was previously identified for housing but historically not taken forward by the landowner due to location of underground utilities and the potential negative impact on site capacity.</td>
</tr>
<tr>
<td>Support for the proposed allocation subject to an increase in potential capacity.</td>
</tr>
<tr>
<td>Suggestion of a three-storey flatted scheme, consisting 10-15 units.</td>
</tr>
<tr>
<td>Potential constraints include the cost of diverting both the existing footpath and underground utilities.</td>
</tr>
<tr>
<td>Request that a contribution is paid to Hampshire County Council (HCC) towards enhancing the nearby Staunton Country Park to mitigate for increased recreational pressure.</td>
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</table>

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<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>The council does not yet have the findings of the Havant Borough Open Space and Play Pitch Strategy which is underway. As such, there remains uncertainty as to whether the loss of open space may be an overriding constraint to development of this site at this stage. At present, no site-specific matters have been raised which indicate the site is not deliverable or should not be allocated in the HBLP 2036. The policy as proposed in the regulation 18 draft should proceed, with wording changes, and revisions to reflect and incorporate the recommendations from the Open Space and Play Pitch Strategy once it is available. The policy should be amended to:</td>
</tr>
<tr>
<td>• Reflect that the site was allocated in the Local Plan (Allocations Plan) under reference L46</td>
</tr>
<tr>
<td>• Highlight the underlying sewage/waste water infrastructure in the Site Opportunities &amp; Constraints</td>
</tr>
<tr>
<td>In addition, consider whether the policy should be amended to:</td>
</tr>
<tr>
<td>• The revised proposal for a three-storey flatted scheme, consisting 10-15 units</td>
</tr>
<tr>
<td>• Add to the developer requirements that a contribution is paid towards enhancing the Staunton Country Park in line with HCC’s request</td>
</tr>
<tr>
<td>• Add to the developer requirements that the footpath is diverted</td>
</tr>
</tbody>
</table>
Summary of key comments raised by residents and other stakeholders

**Principle of development**

Support for inclusion of the site - it is deliverable within the plan period. No showstopping constraints, majority of the units can be delivered in the plan’s first five years.

Development should be reduced in size with more consideration given to retaining open space and views.

There is a rush to develop the site, was originally indicated as coming late in the plan programme.

Will be to detriment of local environment and everyday life of existing residents.

Site’s capacity should be increased to in around 700 units - 560 units would be 20dph and conflicts with H3.

Should have development surrounded by woodland rather than a woodland surrounded by development.

**Infrastructure**

It is requested that any potential adverse impacts to the safe and efficient operation of the Strategic Road Network (SRN) be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

Only slightly smaller than the statutory need to provide a 1FE primary school.

Welcome the approach in the policy regarding education infrastructure. However supporting text should be updated to ensure complete consistency with the IDP, which states that Morelands School can expand to 3FE. The next version of the Local Plan should reflect the latest position agreed with Hampshire County Council.

Doctors surgery at Crookhorn already at capacity, as is Queen Alexandra Hospital.

Improvements will be needed to the transport infrastructure.

Where is the access road going to be?

Suggestions proposed for improving traffic flow in the local area to increase highway capacity.

What leisure facilities will be available to counteract any antisocial behaviour?

What employment prospects will there be for new residents?

Capacity check shows no need for water main reinforcement.

Lack of attention to education, particularly secondary.

Infrastructure to be delivered comprehensively - this should include early years.

Havant Footpath 26c and Havant Bridleway 28 (Scratchface Lane) pass through this site. Allocation should require the retention and enhancement of these routes. A high-quality multi-user route going east-west should be provided, linking College Road to Bridleway 28. Request that the allocation provide a contribution towards achieving a multi-user route from Bridleway 28 down to Portsdown Hill Road, which is an aspiration of the Hampshire Countryside Access Plan.

**Landscape and heritage**

It is a greenfield site which will result in significant change to the landscape of the area.

Will have a negative effect on the rural character of the area and the special nature of Portsdown Hill.

Landscape already partly degraded. Requires even more restraint to maintain what remains of its scenic, wildlife and historic value.

There will be no differentiation between Waterloooville, Portsmouth and the surrounding areas.
Developers should be subject to guidelines to make sure that the proposed development is not a blot on the landscape.

Do not consider the site to be on Portsdown Hill or particularly visually sensitive given that views in and out of the site are not prevalent.

Site is within the setting of Fort Purbrook Scheduled Ancient Monument. Any harm should ideally be avoided but certainly requires clear and convincing justification in the form of overriding public benefits. The relationship of the Fort to the area to the north, the anticipated direction of attack, is an important element of its significance. A detailed assessment of the contribution of the Fort and the likely impacts of development the Fort and its significance needs to be undertaken. This was previously requested before identifying any development areas in the vicinity of the Fort. As such, object to this allocation until such a detailed assessment has been undertaken and confirmed the proposed allocation would not have an unacceptable impact on the significance of Fort Purbrook.

**Retail**

Demographics of the area and proximity of other stores has led to no interest in convenience stores.

**Ecology**

Only part of the site is designated as a primary support area for Solent Waders and Brent Geese, other parts of site are secondary and low-use.

Site is a Primary Support Area for Waders and Brent Geese. Appropriate mitigation needs to be secured in line with E17.

Natural England strongly recommends a comprehensive ecological mitigation strategy (covering protected species and wider wildlife) is secured for the site that achieves net biodiversity gain. This should use a DEFRA metric to quantify the change in habitats at the site. Strategy will need to ensure the remaining wildlife areas and green infrastructure are significantly enhanced and support the wider ecological network in the Borough.

Early consultation with Natural England with regard to the site is recommended.

**Open space**

Improvement needed to the recreation facilities opposite South Downs College.

Gardens should be large enough for children to play.

Play area to be sited centrally.

**Littletpark Wood west**

Littletpark Wood west and Scratchface Lane trees should be protected as a nature reserve. Should not be part of the H41 area for urban extension. Gundymoor Woods depends on the undisturbed link through these woods to Campdown.

Questions whether the part of the site north of Scratchface Lane is deliverable given its wooded nature.

Littletpark Wood and Scratchface Lane should not be used for development.

**Constraints**

Site is in a sensitive location for archaeology and ecology.

Preserve existing trees and hedgerows on the site - disappointing that mature oaks already felled.

Pre-application response from Hampshire County Council’s Minerals and Waste team highlights that there is only a small amount of mineral resource in the south of the site that is not of significance. This part of the policy should be removed.

The roman road does not have the same designation status as the roman villa. Reference to “enhancing” the site of the villa should be replaced with “responding”. This will better reflect the approach in the latter part of the policy.
A roman road crosses the site. Development presents an opportunity to maximise the potential of the Roman villa and road. Not enough to defend the status quo.

**Implementation of development**

Evidence that mitigation has been undertaken should be published. Should be checked when development is completed and a register kept by HBC. Information should be reported.

Impossible for developer of this site to influence timing and delivery of infrastructure on sites outside of its control. Could lead to a delay in the site coming forward. The section on coordination with nearby sites should be removed.

**Flood risk**

Purbrook area is subject to local flooding and drainage issues - plans needed to make sure that development will not have a detrimental impact.

Site is in catchment for Bedhampton Brook, a ‘main river’,

**Sports facilities**

There is no evidence to justify these facilities on the site. Recommend that this part of the requirement is removed.

Precious space should not be wasted on more sports facilities. There are some on the other side of College Road.

**Other matters**

Questions whether any of the site was formerly used for landfill.

Planning applications should go to Chichester Harbour Conservancy and Langstone Harbour Board.

A foul water sewer crosses the site from Crookhorn to Bedhampton.

**HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider the following:

- The status of Littlepark Wood in the plan and the overall site boundary
- The precise site area and any impact on the proposed residential yield of the site
- Whether the allocation should be specific about the location of access(es) and, if necessary, emergency access(es) to the site together with the wider coordination of infrastructure with nearby development sites
- Whether reference should be made to replacement of mature trees already felled
- Whether opportunities for prior extraction of minerals is still necessary following the further advice from Hampshire County Council Minerals and Waste team
- Whether references to the Roman villa and road should be amended
- The allocation as drafted would not prevent the site coming forward separately to other nearby sites. However, it is necessary to require the infrastructure impact to be considered in combination with other nearby sites. This is logical given the amount of development proposed in the Purbrook area. However, consideration should be given to changing “delivered comprehensively” to “assessed in combination”
- Clarify if necessary the potential for presence of landfill
- Clarify utilities which run across the site
- Whether references to the expansion of Morelands School need to be updated to reflect the latest position, bearing in mind that if for whatever reason the expansion is not completely possible, land may be required on this development site for a new school.
• Whether the submission of the ‘ecological assessment’ should be updated to an ‘ecological mitigation strategy’ in line with Natural England’s suggestion.
• Whether any references to the management and mitigation of the development on the SRN are needed, following completion of the Borough Wide Transport Assessment.
• Whether specific reference to the nearby rights of way and the inclusion of an east-west route should be included.
• Whether the development creates a need for a contribution towards achieving a multi-user route from Bridleway 28 down to Portsdown Hill Road.

Comments where further evidence is needed:
• Request detailed evidence of the marketing that has taken place for a convenience stores from the prospective developer in order to make a reasoned judgement as to whether this element of the allocation should remain.
• Following the completion of the Playing Pitch Strategy, a decision can be made as to whether there is a definitive need for new sports facilities on this site.
• The scale and location of mitigation for Solent Waders and Brent Geese should be clarified following further assessment and the publication of the Solent Waders and Brent Goose Strategy.
• Liaise directly with Portsmouth Water regarding the need for mains reinforcement.

The following detailed matters are for consideration at planning application stage and are covered by policies in the Local Plan:
• Drainage (E13)
• Site specific impacts on the local road network (IN3)
• General ecology (E15)
• Woodland, trees and hedgerows (E15)
• Transport mitigation (IN3)
• Design (including gardens) (E6)

Comments where no change is considered necessary:

The need for employment development is addressed through the Employment Land Review. This examines the sites available and their suitability for employment. There are sufficient available sites to accommodate the need for employment development in the Borough up to 2036.

The impact on the Borough’s infrastructure networks is being comprehensively assessed through the Infrastructure Delivery Plan. This shows that there are deliverable solutions regarding early years, healthcare and primary education. The impact on secondary education of proposed development can be accommodated within the Borough’s existing schools. For primary education, this would involve the expansion of Morelands School.

Leisure facilities are proposed within the Borough’s town centres of Waterlooville and Havant as well as in a specific allocation at the former BAE Systems Park (C9). This is considered sufficient and concentrates leisure provision in the most accessible parts of the Borough.

The proposed location and its visual sensitivity requires the submission of a Landscape and Visual Impact Assessment and that the site responds to its sensitive location in landscape terms. It is appreciated that the development of the site will inevitably lead to a loss of a large amount of greenfield land, however this is necessary in order to meet the need for development in the Borough.

The Local Plan cannot influence when the site is likely to come forward.

Policy E15 already recommends early engagement with Natural England across the Borough. It is not necessary to repeat that for single allocations. It should be noted that there has been significant engagement with Natural England on this allocation prior to its publication.
Mitigation required under S106 agreements is already monitored (and the developer pays for this) and a completion notice issued where it has been confirmed that the mitigation has been completed in compliance with the relevant details. Completion notices are already made public. Similarly, mitigation secured by a planning conditions is monitored through the development management process. Where details of mitigation are supplied in compliance with the details of the condition a discharge of condition notice is issued. Discharge of condition notices are already made public. Should it be ascertained that conditions have not been correctly implemented, this will be investigated and appropriate action taken through the Council’s Planning Enforcement Service.
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>No early years or related infrastructure has been included.</td>
<td></td>
</tr>
<tr>
<td>It is expected that Havant Bridleway 1b (through the site), Restricted Byway 523 (eastern boundary) and Denmead Bridleway 42 (western boundary) are retained and enhanced.</td>
<td></td>
</tr>
<tr>
<td>It is requested that a contribution is paid to Hampshire County Council (HCC) towards works at Horndean BOAT 46.</td>
<td></td>
</tr>
<tr>
<td>Suggestion that one of the 2 bridleways or BOAT 46 is opened for cycling.</td>
<td></td>
</tr>
<tr>
<td>Suggestion of a cycle link to Victory Avenue so to complete the route to Horndean Town Centre.</td>
<td></td>
</tr>
<tr>
<td>Suggestion of cycle connections from the site to Horndean and Cowplain Secondary Schools, along with Waterlooville Town Centre.</td>
<td></td>
</tr>
<tr>
<td>Comment that Milton Road has a good quality cycle route to Hambledon Road providing connections to Berewood and Waterlooville Town Centre from National Cycle Route 222.</td>
<td></td>
</tr>
<tr>
<td>Support for a planned cycle link on Milton Road between Lovedean Lane and Hartplain Avenue as shown on the Havant Borough Cycle Network Map 2017.</td>
<td></td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

<table>
<thead>
<tr>
<th>Proposal</th>
<th></th>
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<tbody>
<tr>
<td>No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to:</td>
<td></td>
</tr>
<tr>
<td>• Retain and, where possible, enhance Havant Bridleway 1b, Restricted Byway 523 and Denmead Bridleway 42.</td>
<td></td>
</tr>
<tr>
<td>• Include a developer contribution towards works at Horndean BOAT 46.</td>
<td></td>
</tr>
</tbody>
</table>

Comments where no change is considered necessary:

Regarding the suggested cycle connections outside of the site, in parallel with the Local Plan the Council are bringing forward the ongoing development of the Borough’s cycle network via Community Infrastructure Levy (CIL) and other funding sources available. These suggestions will be considered in the future but will not be directly outlined in the Local Plan. Please note, that there are no plans to provide a signposted cycle network link at present along Milton Road (between Hart Plain Avenue and Lovedean Lane); the Havant Borough Cycle Network Map 2017 currently highlights this section of road as a “suggested route” for cyclists.

Finally, the capacity and future growth of early years infrastructure has been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP).
### Summary of key comments raised by residents and other stakeholders

The revised policy is noted and supported.

The removal of the site from Waterlooville Town Centre's boundary, in order to allow residential development, is supported.

As the site is in a transitional area between Waterlooville Town Centre and Berewood, along with its location within the 300m “edge of centre” buffer zone around the town centre, it is suggested that a higher development potential of at least 150 dwellings, calculated from 75 dph (dwellings per hectare), may be appropriate in order to maximise the potential of the land.

The site is in a highly sustainable location with the potential to provide links between Waterlooville Town Centre and Berewood.

Criterion cii) is supported as the MDA (Berewood) has inadequate cycle access to the town centre. Further suggestion of a split-level access from the site to the town centre as to encourage cycling.

Amend the reference, regarding SPZs, in the Site Opportunity & Constraints to state that site is in SPZ 1c for Havant & Bedhampton Springs.

No early years or related infrastructure has been included.

The development should retain and enhance Havant Footpath 11 and upgrade it to a multi-user route if possible.

It is requested that any potential adverse impact to the safe and efficient operation of the Strategic Road Network (SRN) is appropriately considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. The policy should be amended to:

- State the correct SPZ 1c category for Havant & Bedhampton Springs
- Remove the reference to Policy H50 as this site was discounted in the Sustainability Appraisal

In addition, consider whether the policy should be amended to:

- Retain and enhance Havant Footpath 11 (and state the opportunity to upgrade it to a multi-user route)
- Include a requirement for links between the site and the town centre to encourage cycling
- Increase the capacity of the site to 150 dwellings to reflect the edge of centre (“transitional”) location
- State that any adverse impact on the SRN is considered, managed and mitigated in line with Policies IN1, IN2 and IN3, as well as circular 02/2013

Comments where no change is considered necessary:

- The capacity and future growth of early years infrastructure has been considered as part of the Borough-wide Infrastructure Delivery Plan (IDP)
Summary of key comments raised by residents and other stakeholders

### The principle of development and general comments

Support for the allocation.

Replacement provision of the golf course would be needed to comply with Policy E3/development may make the golf course an uneconomic facility.

The two allocation areas are not actually linked, no access to western triangle.

Site should not be referred to as Campdown.

Site can come forward separately to the two nearby sites.

References to development and open space being in the east and west respectively should be deleted.

What employment prospects will there be for new inhabitants?

Planning applications should go to Chichester Harbour Conservancy and Langstone Harbour Board.

There is a rush to develop this site.

Will have an effect on house prices and desirability of the area.

### Infrastructure

Welcome the approach in the policy regarding education infrastructure. However supporting text should be updated to ensure complete consistency with the IDP, which states that Morelands School can expand to 3FE. The next version of the Local Plan should reflect the latest position agreed with Hampshire County Council.

It is requested that any potential adverse impacts to the safe and efficient operation of the Strategic Road Network (SRN) be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

PCC may be able to provide land to assist HCC with their education priorities in lieu of a financial contribution.

Concern over impact on infrastructure, particularly healthcare and education (including secondary).

Allotment requirement is not applicable as that policy refers to land in agricultural use.

Allotments are stated as being required in the west of the development. Access, topography and tree layout may dictate this is better placed elsewhere.

Not clear what kind of open space would be provided - open green space or floodlit pitches.

Contribution to education could be land in lieu of a financial contribution.

Identifies the west for “open space” - it already is open space.

With all sites proposed in Purbrook, roads will not cope with increase in traffic.

Housing around Morelands school will cause issues at pick up and drop off time.

Should highlight providing car parking for Morelands School.

What leisure and community facilities will be available?

Infrastructure to be delivered comprehensively - this should include early years.

A permissive path runs from Havant Footpath 128, across the recreation ground to Copse Close. HCC would like to explore whether this route could be dedicated as a public right of way, and if so, HCC request that this allocation provide a contribution towards achieving this objective.
Site specific constraints

Tree surveys are needed and TPOs put in place.

An arboricultural assessment would be needed as part of a planning application.

Sensitive for ecology, including Bechstein’s Bat.

Where would access be?

Not clear what mix of homes there would be.

Properties in nearby roads suffer from surface water flooding, development will exacerbate this.

Will have a negative effect on the rural character of the area and the special nature of Portsdown Hill.

Landscape already partly degraded. Requires even more restraint to maintain what remains of its scenic, wildlife and historic value.

How will the elevation be taken into account?

HBCs proposed way forward for Regulation 19 HBLP2036

As has been highlighted through the consultation, the site is used for sporting facilities and the need for these is currently being reviewed. This could potentially have a fundamental impact on the suitability of the site for development.

Through the Draft Local Plan it is clear that the Borough can provide sufficient sites to accommodate the need for housing together with a reasonable buffer. This would not change if this site (and others where the principle of residential development is being reconsidered) is not allocated. On this basis, it is appropriate to reconsider the principle of residential development on this site after the publication of the Playing Pitch Strategy.

Notwithstanding the above, if the allocation is still to proceed in the future, consider whether the policy should be amended to:

- Set out how the two sections of the allocation would be linked, given that the western one is landlocked and clarify whether both sections are needed
- Clarify the detail of the expansion of Morelands School. It could be pragmatic to allocate Morelands School for expanded educational facilities, including any section of this site that is needed for access and parking
- Include text regarding open space and allotments needs amending
- Require an arboricultural assessment to support any planning application
- Require a landscape and visual impact assessment to support any planning application
- Update the site opportunities and constraints should be updated to highlight that the site is partly in the Bechstein Bat area of search
- Highlight the extent of ancient woodland within the site and its impact on design and layout
- Update references to the expansion of Morelands School need to reflect the latest position, bearing in mind that if for whatever reason the expansion is not completely possible, land may be required on this development site for a new school.
- Whether any references to the management and mitigation of the development on the SRN are needed, following completion of the Borough Wide Transport Assessment.
- Include reference to upgrading the existing permissive route to a right of way

The following detailed matters raised are for consideration at planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (IN3)
• Access (IN3)
• General ecology (E15)
• Woodland, trees and hedgerows (E15)
• Transport mitigation (IN3)
• Housing mix (H3)
• Drainage (E13)

Comments where no change is considered necessary:

The allocation as drafted would not prevent the site coming forward separately to other nearby sites. However, it does require the infrastructure impact to be considered collaboratively with other nearby sites. This is logical given the amount of development proposed in the Purbrook area.

No specific employment provision is proposed on this site specifically as it is not considered a suitable site for employment provision. However, within the Borough as a whole, a large amount of new employment provision is being planned for.

Any impact on nearby property prices is not a matter which the Local Plan is able to take into consideration.

The site is proposed for development; however the Local Plan does not set out when the site should be developed.

The impact on the Borough’s infrastructure networks is being comprehensively assessed through the Infrastructure Delivery Plan. This shows that there are deliverable solutions regarding early years, healthcare and primary education. The impact on secondary education of proposed development can be accommodated within the Borough’s existing schools. For primary education, this would involve the expansion of Morelands School. The draft IDP shows no need for community facilities in this area.
Summary of key comments raised by residents and other stakeholders

Concerns in relation to the loss of the car park:
- College requires more car parking
- Car park not surplus to requirements
- Overspill parking on adjoining residential streets
- Vehicle movements / car parking associated with college facilities, including sports facilities and football pitch

It is the current college car park not the former.

Term time bus services only.

Increase in capacity of Camp Down site (from 350 to 560 dwellings) and cumulative impact of this site.

Adverse impact on Portsdown Hill / landscape.

Sensitive location in terms of archaeology and ecology.

Concern about the timing of the site coming forward for development.

Impact on the local environment.

Loss of green space.

Impact on existing residents.

The site is adjacent to a primary support area for Brent Geese and Waders.

Concern over relationship between the Council and the landowner.

Chichester Harbour Conservancy and the Langstone Harbour Board should be consulted.

It is requested that any potential adverse impacts to the safe and efficient operation of the Strategic Road Network (SRN) be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.

Welcome the approach in the policy regarding education infrastructure. However supporting text should be updated to ensure complete consistency with the IDP, which states that Morelands School can expand to 3FE. The next version of the Local Plan should reflect the latest position agreed with Hampshire County Council.

Infrastructure to be delivered comprehensively - this should include early years.

Will have a negative effect on the rural character of the area and the special nature of Portsdown Hill.

Landscape already partly degraded. Requires even more restraint to maintain what remains of its scenic, wildlife and historic value.

**HBCs proposed way forward for Regulation 19 HBLP2036**

There is a need to further investigate the extent to which the car park is used and the pattern of use pending the changes to the campus (following the merge with Havant College).

Should the college demonstrate there is adequate car parking retained within the revised campus boundary following an assessment of parking demand, it would be possible to proceed with the policy as proposed in the Regulation 18 draft, with potential minor wording amendments. In addition, consider the following:

- Amend the title of the site allocation to reflect the fact the car park is still in use
- Explore opportunities to improve public transport provision between the two campuses
- Whether references to the expansion of Morelands School need to be updated to reflect the latest position, bearing in mind that if for whatever reason the expansion is not completely possible, land may be required on this development site for a new school.
- Whether any references to the management and mitigation of the development on the SRN are needed, following completion of the Borough Wide Transport Assessment.

The following detailed matters are for consideration at planning application stage:

- Landscape (E10)
- Archaeology (E9)
- Ecology (E15)
- Residential amenity (E6 / E20)

Comments where no change is considered necessary:

Concern has been raised in respect of the cumulative impact of development of this site, and the East of College Road (H41) site. The policy requires infrastructure to be delivered across the site and nearby sites in a coordinated and timely manner accordingly. Existing infrastructure provision has also been considered in detail through the Draft Infrastructure Delivery Plan.

The allocation as drafted would not prevent the site coming forward separately to other nearby sites. However, it does require the infrastructure impact to be considered collaboratively with other nearby sites, including the capacity and future growth of early years infrastructure. This is logical given the amount of development proposed in the Purbrook area.

The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.

The site is adjacent to a primary support area for Brent Geese and Waders as defined by Policy E17. A project level Habitats Regulation Assessment to inform any package of avoidance and mitigation measures has therefore reflected in the site requirements in the policy.

The Council has objectively assessed the merits of this site and has considered that the site should be allocated for housing.
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>Site suffers from severe drainage issues (underlain by red clay) - geological study is needed.</td>
</tr>
<tr>
<td>Area has considerable traffic flow problems / junction is already congested / difficult to navigate due to parked cars - traffic assessment is needed; Existing problems should be addressed before new ones are added.</td>
</tr>
<tr>
<td>Proximity of school access is a safety concern.</td>
</tr>
<tr>
<td>Fundamental objection to inclusion of the site.</td>
</tr>
<tr>
<td>Amendment to site boundary suggested to include a small area of land to the north.</td>
</tr>
<tr>
<td>There is a lack of infrastructure in the area.</td>
</tr>
<tr>
<td>Development of the site would mean a loss of green space.</td>
</tr>
<tr>
<td>Development of the site would mean a loss of community buildings.</td>
</tr>
<tr>
<td>Allocation supported.</td>
</tr>
<tr>
<td>Buildings on the site do not have historic merit and should not be required to be retained.</td>
</tr>
<tr>
<td>Development of the site would not affect the Hazleton Common and Waterlooville SINCs.</td>
</tr>
<tr>
<td>Number of dwellings should be reduced.</td>
</tr>
<tr>
<td>Development can be achieved without affecting trees</td>
</tr>
<tr>
<td>Bat surveys have shown presence in low numbers, and Bechstein’s Bat is understood to be present only on the other side of the A3(M)</td>
</tr>
</tbody>
</table>

Havant Footpath 127 runs across this site, while Havant Bridleway 22 (Sheepwash Road) connects to the site’s north-east corner. We would expect development at this location to retain this right of way, and provide a high-quality link between the two routes, with a suitable green corridor. In addition, HCC request that the allocation include the provision of developer contribution towards enhancing Footpath 127, which provides a sustainable travel link to Park Lane and The Queen’s Enclosure to the south.

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments.

In addition, consider whether policy should be amended to
- Amend the site boundary
- Remove criterion (b), as it is the Heritage Statement required through criterion (a)(i) which will provide the evidence as to whether historic buildings on the site should be retained
- Acknowledge underlying clay / poor permeability in site opportunities and constraints and include a requirement for a geological study and/or drainage strategy under criterion (a)
- Require the retention of and a contribution towards rights of way

The following detailed matters raised in the comments are for consideration at planning application stage and are covered by policies in the Local Plan:
- Drainage
- Transport Assessment
- Heritage Statement
- Ecological Assessment
- Arboricultural Assessment
Comments where no change is considered necessary:

- The site has been shown to have capacity for around 85 dwellings. No change needed to dwelling number.
- It is acknowledged that the site includes some open space. However, this is not formally public open space, and the site is considered to be previously developed land.
- The site does not include any community buildings.
### Summary of comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Proposed allocation of this site supported</th>
</tr>
</thead>
<tbody>
<tr>
<td>It is considered that the sports facility/play space required by the policy has already been provided</td>
</tr>
<tr>
<td>Further clarity required over access to the Woodcroft Farm site - suggested wording provided</td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider whether the policy should be amended to:

- No longer require a sports facility/play space
- Provide clarity over where access should be provided
The density of development proposed is excessive and out of balance with the character of the area and should be reduced to 20.

Possible restrictive covenant on proposed allocation.

Question raised as to whether the area of allocation is a protected green space.

The allocation is in a SINC and as such should be protected.

Bats, as well as other wildlife including; deer, owls, hedgehogs, grass snakes and slow worms are present on site. Development may have a huge impact on nature conservation.

Trees and shrubbery and brambles are already being removed on site without regard to any bat or bird habitats.

Removal of trees on site (particularly Black Poplars) may result in subsidence to existing properties.

TPO’s are present on site.

The woodland included in the allocation acts as a noise buffer for existing residents.

Concerns that there is no safe access available to the site and the capacity of the wider road infrastructure.

Concerns over safety regarding construction traffic and increased traffic arising from the development. Particularly with regard to children.

Construction traffic will create dust and mud on roads

Quality of life and residential amenity will be affected by increased traffic.

Properties were purchased due to quite location and views over the golf course, development will lower property prices

The allocated area is particularly prone to extremes of drought and flooding due to clay geology and trees.

Flooding is a problem and extra houses and impermeable surfaces may dispel surface water into neighbouring properties.

There is not enough capacity in local schools or doctors’ surgeries. There is a complete lack of infrastructure.

Loss of community buildings.

**HBCs proposed way forward for Regulation 19 HBLP2036**

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The Council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to:

- Change the boundary of the site to exclude the area of woodland

The following detailed matters are for consideration at the planning application stage and are covered by policies in the Local Plan:

- Site specific impacts on the local road network (IN3)
- Access (IN3)
- Ecology (E15)
- Flood risk and drainage (E12 / E13)
- Residential amenity (E6 / E20)
• Woodland, trees, hedgerows, TPOs (E15)
• Landscape and Townscape (E10)

Comments where no change is considered necessary:

• There are no community buildings within the allocation area.
• GP provision, school capacity and other infrastructure considerations have been assessed as part of the Borough-wide Infrastructure Delivery Plan (IDP)
• The site is located within Flood Zone 1, an area with less than 1 in 1000 year annual probability of sea or river flooding - concerns raised in relation to flooding are likely to be in relation to surface water flooding due to ground geology. As above, an appropriate drainage strategy as part of any proposed development would be secured in accordance with the requirements of policy E12. This would ensure there is no increase in surface water runoff from the development.
• Views are not protected within the planning system.
• Impact on property prices is not something the Local Plan can take into account.
• Removal of vegetation not protected by law on private land is the right of the landowner.
• Any subsidence created by works on site would not be a matter for the local plan but would be a separate legal matter between landowners.
• Although the area is designated as a Site of Importance for Nature Conservation (SINC) the allocation area has been screened for ecological value by the Council’s Ecologist and is considered suitable for development once further surveys and mitigation have taken place as the ecological value is at the site’s edges. The allocation policy requires further ecological survey work and identifies specific mitigation for known protected species.
• As any restrictive covenants have the potential to be removed by the signatories this is not a reason to consider the site undeliverable.
• The site is not identified as a protected green space. The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.
Commercial development
<table>
<thead>
<tr>
<th><strong>Summary of key comments raised by residents and other stakeholders</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>No reference to protect marine businesses from non-marine related employment and other uses as per Policy CS2 in the Core Strategy.</td>
</tr>
<tr>
<td>Class D2 sports uses should be acceptable on employment sites - both in terms of providing a sustainable working environment, an attractive area for business locate to, as well as generating employment opportunities.</td>
</tr>
<tr>
<td>Need to revise overall employment provision figures subject to revised capacity at Dunsbury Park.</td>
</tr>
<tr>
<td>Concern in relation to loss of marine-related floorspace at Northney Marina, and note its inclusion on figure 70 as an ‘intensification opportunity’ as well as its own settlement boundary to suit the proposed allocation.</td>
</tr>
<tr>
<td>It is requested that any potential adverse impacts to the safe and efficient operation of the Strategic Road Network (SRN) be appropriately considered, managed and mitigated, in line with Policies IN1, IN2, IN3 as well as the NPPF and Circular 02/2013.</td>
</tr>
</tbody>
</table>

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider how the policy may be amended to include:

- Protection of marine businesses and the Council’s approach to the consideration of proposals resulting in the loss of marine-related employment
- Sufficient flexibility to support Class D2 sports uses on employment sites
- The safe and efficient operation of the SRN in relation to the proposed redevelopment and intensification of employment areas such as Harts Farm Way North

In addition, review total employment floorspace likely to be delivered, subject to any revisions of the site capacity at Dunsbury Park (KS6) and the inclusion of any further sites.

**Comments where no changes are considered necessary:**

Northney Marina (H30) is a mixed-use allocation for residential, employment and commercial uses. The redevelopment of the site will involve the redevelopment of redundant office floorspace. Whilst this will result in a net loss in office floorspace, this will be partly offset by gains in new office and commercial floorspace as part of the redevelopment of the site. However the principle of development on the site will be subject to further consideration (please see response to Policy H30 (Northney and Sparks Marinas)).
Summary of key comments raised by residents and other stakeholders

It would be helpful to list the ‘established employment areas’ with individual maps clearly showing each site.

Northney Marina should be included as an established employment area.

Concern that marketing requirements have been weakened.

No reference to importance of protecting marine-related employment sites.

Revised policy wording to include reference to ‘economic development’ use in place of ‘employment development’.

There is no justification for inclusion of non-food retailing as an employment use.

Emerging Policy C2 sets out specific criteria specifying in what circumstances employment land may be redeveloped for alternative uses. Yet paragraph 6.19 simply states that “Land allocated for industrial or commercial use can be used for Starter Homes where this land is underused or unviable for those purposes”. This is a very general statement, which implies that a lower evidential threshold for assessing the acceptability of a proposed change of use would apply where Starter Homes were proposed.

HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider how the policy may be amended to include:

- A list of established employment areas with accompanying maps included within the supporting text including the consideration of Northney Marina (H30) as an established employment area
- Clarification on the protection of marine businesses and the Council’s approach to the consideration of proposals resulting in the loss of marine-related employment
- A criterion supporting retail (both food and non-food) and other complementary uses provided they are of a scale which is subservient to the main function of the employment area
- Clearer guidance on how the Council will consider proposals submitted under the Government’s Starter Homes exception sites policy.

Whilst Northney Marina is already identified as a mixed-use allocation (H30) which only permits residential development where it will not adversely affect the primary function and operation of the site for marina purposes (nor result in the net loss of employment from the site), it is considered that it may be prudent to safeguard the marina from other non-marina uses in the long term.

Comments where no change is considered necessary:

As currently defined within the NPPF, ‘economic development’ includes those within B Use Classes, public and community uses, and main town centre uses (but excluding housing development). It is considered that economic development contains a broad range of uses which would result in an overly permissive policy if the scope was expanded outward to include all of these uses. As above, it is however, considered appropriate to include a criterion relating to small scale uses which are complementary to the function of the employment area.

It is suggested that marketing requirements have been weakened as they are not included within the policy itself. The policy wording is clear that a realistic and active marketing exercise is required, and it is considered appropriate to include the relevant marketing requirements within the supporting text.
### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Support for the site to be developed for Portsmouth Water's Headquarters.</td>
<td></td>
</tr>
<tr>
<td>Request to amend the site's boundary in accordance with the access and landownership creating a new site area of 1.708 ha.</td>
<td></td>
</tr>
<tr>
<td>Request to amend criterion b) in accordance with National Planning Practice Guidance (NPPG) paragraph 023 to read “Brockhampton Conservation Area is preserved or enhanced”</td>
<td></td>
</tr>
<tr>
<td>Request to amend criterion di) to read “where possible, and subject to appropriate mitigation, retains and integrates the protected trees on the site” so that other constraints (i.e. access) which may require the loss of trees is taken into consideration.</td>
<td></td>
</tr>
<tr>
<td>The policy should acknowledge the need for the development to be located outside of the areas at risk of flooding, and provide appropriate floodplain compensation. The flood risk issues are likely to provide significant limitations in terms of the scale of development deliverable on the site.</td>
<td></td>
</tr>
</tbody>
</table>

### HBCs proposed way forward for Regulation 19 HBLP2036

Subject to the outcomes of the SFRA phase II, proceed with policy as proposed in the regulation 18 draft with any necessary amendments. In addition, consider whether the policy should be amended to include the suggested amendments to criteria b) and di), along with the proposed boundary alteration.
### C4 - Cowplain District Centre

1 response was received regarding this topic

<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>The car parking allowed on the A3 through the centre is hazardous to cycle past, as such cycling to the centre feels unsafe.</td>
</tr>
<tr>
<td>There are numerous Sheffield stands which are adequate for short-term cycle parking in dry weather. Suggestion to include covered and secure cycle parking to help improve all-weather use of the centre.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HBCs proposed way forward for Regulation 19 HBLP2036</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider whether the policy should be amended to encourage secured and covered cycle storage. The Council is producing a cycling strategy which will consider how the cycle network can be improved so that everyone can easily access and use shopping areas.</td>
</tr>
</tbody>
</table>
## Summary of key comments raised by residents and other stakeholders

Parking in Emsworth is close to capacity and that greater provision is needed. Suggestion to include a two-tier parking scheme (like Havant Railway Station) on the Palmer’s Road car park.

What sites has the Council identified for additional parking in Emsworth Centre?

Charity shops do not encourage shoppers.

More shops are closing, along with Emsworth’s last bank; this has impacted upon local businesses.

Suggestion to co-locate the banks and run three desks and one venue.

Suggestion to promote the development of the Emsworth Victoria Cottage Hospital for a GP Surgery and other town centre services.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording changes.

Comments where no change is considered necessary:

- It is considered that Emsworth District Centre is well-served for parking and no sites have been identified for additional parking; however, there is nothing in the policy to prevent a two-storey car park or other parking options coming forward in principle if the demand is shown and it is viable.
- It is not in the remit of the HBLP 2036 to deter or promote specific shops and services (i.e. charity shops and banks). Instead the HBLP 2036 proposes frontages for certain uses as outlined in the Land Use Class Order 1987 (as amended).
- Emsworth Victoria Cottage Hospital has been proposed as its own allocation in the Draft HBLP 2036, please see Policy H12.
Summary of key comments raised by residents and other stakeholders

- Retail shops in the centre are decreasing and being replaced by offices, cafés and other eating places; this change is organic based on the population’s changing needs.

- The idea that the Council can influence the evening economy is a red herring as this is seasonal; except for the summer months, most establishments have few customers past 9:30pm.

- Paragraph 7.58 states that the Council-owned car parks could be redeveloped for housing; this will close the gaps.

- The arrival of Lidl appears to be a good thing and will help maintain a good mix of shops; however, this will not be enough if more people move onto the island.

HBCs proposed way forward for Regulation 19 HBLP2036

- Proceed with policy as proposed in the regulation 18 draft with wording amendments.

Comments where no change is considered necessary:

- By setting policies which guide the types of land class uses permitted within the primary and secondary frontages, the Council can help influence and improve the evening economy for both residents and visitors.

- The centre’s three car parks are brownfield sites surrounded by retail and residential development. It is important to consider their redevelopment in the future in order to maximise their use to support the centre’s health, i.e. for further retail units if a clear marketing need was identified, the extension of the health centre and/or residential development on brownfield land.
### Summary of key comments raised by residents and other stakeholders

It is important that clarification is provided within the wording of the policy to confirm that the 280 square metres does not represent a locally set impact threshold as envisaged by national planning policy.

In the absence of any robust consideration being undertaken to support a locally set threshold, it must follow that the default threshold set by national planning policy (i.e. 2,500 square metres) would apply.

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments to clarify that the 280 square metres is not referring to the impact threshold envisaged by national planning policy. In addition, consider whether to amend the policy to specify that the Sequential Test will apply for any proposal of more than 280 square metres outside of the designated town, district and local centres, and that an Impact Assessment will be required for proposals over the national default threshold which are also outside designated centres.
### Summary of key comments raised by residents and other stakeholders

There are no restrictions placed on Land Use Class A5 (hot food takeaways) despite the acknowledgement in Paragraph 7.88.

There is a growing body of evidence that proximity to hot food takeaways is associated with obesity.

It is encouraged that the Council use the policy to restrict the density of Land Use Class A5 in the Borough as per Government Guidance on [Health and Wellbeing](#).

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether further investigation into the health impacts of hot food takeaways should be undertaken and whether the Council could appropriately restrict the density of Land Use Class A5. To do this, further evidence will be required to justify the level of restriction.
C9 - Former BAE Systems Park
3 responses were received regarding this topic

Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Comment</th>
<th>Details</th>
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</thead>
<tbody>
<tr>
<td>Support allocation but policy should be more flexible to allow wider uses (as permitted) - Local Plan should make a potential allowance for residential development.</td>
<td></td>
</tr>
<tr>
<td>Pedestrian / cycle route secured as part of Lidl scheme (ref. APP/15/00772) and should not be referenced.</td>
<td></td>
</tr>
<tr>
<td>Marketing should not be required as part of a planning application.</td>
<td></td>
</tr>
<tr>
<td>Query as to whether site in public ownership.</td>
<td></td>
</tr>
<tr>
<td>Query as to what new leisure facilities are planned.</td>
<td></td>
</tr>
<tr>
<td>Site plan should recognise this site as a mixed-use allocation not an employment allocation.</td>
<td></td>
</tr>
<tr>
<td>Inclusion of ‘the site is within SPZ 1c / close proximity to SPZ 1c for Havant &amp; Bedhampton Springs’ under the ‘Site Opportunities &amp; Constraints’</td>
<td></td>
</tr>
<tr>
<td>Question as to whether the Council are aware that the Original Bowling Company have registered an interest in becoming part of a leisure development-park with the provision they are not a standalone (they require other leisure providers e.g. cinema and restaurants). The Council should open talks with the developer (Hargreaves) and the Original Bowling Company to find common ground. This is a crucial site with in Waterlooville and could be a jewel in the Local Plan for the Havant and Waterlooville area.</td>
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</tbody>
</table>

HBCs proposed way forward for Regulation 19 HBLP2036

No fundamental matters have been raised which indicate that the site is not deliverable or should not be allocated in the HBLP 2036. The council is satisfied that the evidence base supports an allocation. Proceed with policy as proposed in the regulation 18 draft, with wording amendments. In addition, consider the following:

- Investigate whether the pedestrian/cycle route linking the site with Wellington Park has been implemented
- Reference to the site’s proximity to SPZ 1c for Havant & Bedhampton Springs
- In addition, amend Figure 77 to reflect the fact that this is site is a mixed-use allocation

Comments where no change is considered necessary:

It is considered that, as drafted, the mixed-use allocation for leisure (Class D2) and other main town centre uses is sufficiently flexible. Furthermore, the Havant and Waterlooville Town Centres Study (2017) recommends the site allocation is maintained for leisure uses. As such it is not appropriate to amend the policy to include a wider range of uses.

It is accepted the site promoter has continued to market the site and work collaboratively with the Council to bring the site forward for development. Whilst specific operators and businesses may well have expressed interest in occupying a unit on the site, this needs a lease to be agreed that is acceptable to all parties, including the site operator/developer, including the ability to generate a reasonable profit. However, as part of any planning application, the applicant will be required to provide a statement detailing the level and type of marketing undertaken and for what use etc. This should help to inform the type of proposed development form and uses on the site, including leisure provision.

The site is in private ownership.
# Summary of key comments raised by residents and other stakeholders

### Comments about Hayling Island seafront regeneration - please see table on ‘Hayling Island Seafront (General)’.

<table>
<thead>
<tr>
<th>Comment</th>
<th>Details</th>
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</thead>
<tbody>
<tr>
<td>Emsworth, Staunton Country Park and Hayling Island have their own unique features and attract different types of tourism trade.</td>
<td></td>
</tr>
<tr>
<td>Housing development does not increase tourism or provide jobs.</td>
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</tr>
<tr>
<td>Only reference to improving leisure facilities is a watersports centre.</td>
<td></td>
</tr>
<tr>
<td>Tourism facilities should be of high quality design.</td>
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</tr>
<tr>
<td>Need for all year-round facilities.</td>
<td></td>
</tr>
<tr>
<td>Hayling ferry is important to provide access to and from the island.</td>
<td></td>
</tr>
<tr>
<td>Support new and improved tourism accommodation and facilities, including flexibility for changing market trends.</td>
<td></td>
</tr>
<tr>
<td>Need for greater flexibility for tourism at all scales - support should not be restricted to small scale.</td>
<td></td>
</tr>
<tr>
<td>More day visitors and housing will generate additional traffic.</td>
<td></td>
</tr>
<tr>
<td>Hayling Island requires a strategy for tourism.</td>
<td></td>
</tr>
<tr>
<td>Improved pedestrian and cycling routes.</td>
<td></td>
</tr>
<tr>
<td>Concern that loss of tourist accommodation and lack of facilities will deter tourists.</td>
<td></td>
</tr>
<tr>
<td>Paragraphs 23 and 28 of the National Planning Policy Framework (NPPF) promote tourism in rural locations, to support competitive rural economy.</td>
<td></td>
</tr>
</tbody>
</table>

## HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft, with minor wording amendments. In addition, consider whether the policy wording could be amended to allow a greater degree of flexibility for the scale of tourism proposals.

In addition, investigate whether there is a need for additional research in respect of tourism and the visitor economy to inform the Regulation 19 HBLP 2036.

Once the borough-wide Transport Assessment is completed, the draft IDP will be updated to reflect and incorporate the recommendations from the transport analyses. This will inform the Regulation 19 version of the Plan.

Comments where no change is considered necessary:

The policy provides sufficient flexibility for all-year round facilities, having regard to changing market trends.

It is considered that the policy strikes an appropriate balance in terms of safeguarding tourism accommodation from non-tourism uses and providing flexibility where it can be demonstrated that there is no reasonable offer for tourism for accommodation purposes and there is available and suitable alternative accommodation (should the operator wish to relocate).

The Hayling Island Ferry as well as walking and cycling are considered in detail through the draft IDP.
## Summary of key comments raised by residents and other stakeholders

It is recommended that the policy distinguishes between commercially-run and publicly-owned or managed community facilities and, as such, that the policy adopts a similar approach to Policy SD43 in the Pre-Submission South Downs Local Plan.

**Objection to the policy as it is too restrictive, inappropriate and unhelpful to public services.**

The policy is restrictive and would harm the NHS’s ability to improve the provision of healthcare services by increasing efficiencies (i.e. via the disposal of unneeded and unsuitable properties). A restrictive policy would prevent or delay the reinvestment of capital in modern and fit-for-purpose facilities.

It should be accepted that the NHS’s testing and approval process provides sufficient evidence that a facility is neither needed nor viable for its current use or other community uses and that adequate facilities, which meet the needs of the local population, are or will be made available.

The built facility can be so specific to a particular service that it is impractical to adapt it to an alternative community use. In such instances, and where the sale of a surplus facility is part of the County Council’s ongoing reinvestment strategy, requiring an intensive exercise can impose unhelpful and unnecessary delay in securing funding for public services.

It is recommended that the policy distinguishes between commercially-run and publicly-owned or managed community facilities and, as such, that the policy adopts a similar approach to Policy SD43 in the Pre-Submission South Downs Local Plan.

**Paragraph 7.106 - Request to include ‘cultural facilities’ to the list uses outlined as community facilities.**  This would ensure consistency with Paragraph 70 of the NPPF.

**Paragraph 7.109 - Request that the policy also applies to Land Use Classes D2 and Sui Generis.**  This would maximise protection for community facilities and be consistent with the NPPF and other Local Plans.

**Paragraph 7.112 - Various suggested wording changes submitted to state that:**
- Re-provision is the first priority;
- The NHS’s Modernisation Strategy is an exception, and;
- The loss or change of use of existing community facilities will be acceptable if shown to be part of a wider estate regeneration programme and that such evidence would be accepted rather than evidence of marketing.

**Criterion c) - This should be deleted as it undermines the policy.**  It is too permissive as it allows for no assessment as to whether there is sufficient capacity within the alternative facility to absorb displaced demand, neither does it determine whether the existing and alternative facilities are compatible.

**Criterion c) - This should be replaced with “adequate facilities are provided to meet the needs of the local population”.**

**In the last paragraph of the policy box, add: ‘unless in the context of healthcare provision, the loss of facilities arises from an NHS Service Modernisation Strategy’.**

### HBCs proposed way forward for Regulation 19 HBLP2036

Proceed with policy as proposed in the regulation 18 draft with wording amendments. In addition, consider whether the policy should be amended to incorporate a more flexible approach for premises providing public services using the suggested amendments provided in the first row above and Policy SD43 of the Pre-Submission South Downs Local Plan. If considered appropriate, amend the wording of the policy as appropriate. Also consider the suggested amendments to paragraphs 7.106 and 7.109 as to whether cultural and leisure facilities should be included.
Other matters
### Additional policies that should be included in the plan

9 responses were received regarding this topic

<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ecological approach to everything discussed.</td>
</tr>
<tr>
<td>Address the use/abuse of second homes. On Hayling there are a significant number of second (holiday) homes that are empty for significant periods. By discouraging (and/or adding to HBC revenue stream) second homes the housing &quot;crisis&quot; would be much reduced in many coastal areas.</td>
</tr>
<tr>
<td>With number of houses that are being built in the Waterlooville and Cowplain area, I feel we need some form of entertainment i.e. a cinema or theatre, bowling alley or any other idea that should come to mind. Is this in the plan at all?</td>
</tr>
<tr>
<td>Provide infrastructure and design guidance on plots for prospective self-build purchasers (which is the Australian model and controls land speculation). This is more beneficial for local contractors than giving huge parcels of land to a single large developer, which in turn is also better for the local economy.</td>
</tr>
<tr>
<td>HBRA feel there is scope for self-build development in the Borough particularly on the large sites and we ask the council to reserve some land for this purpose. There are many skilled trades’ people in the Leigh Park, West Leigh and Warren Park areas unable to afford to buy a home but have skills to build one.</td>
</tr>
<tr>
<td>Our connection to the internet is very poor, and without cabling there is very little we can do about it. It is very short sighted to build any new housing these days without cabling for telecoms to the houses. Please insist that this is part of the standard for the future. Any plan for extending cable access to existing housing on the edge of residential areas (Redlands Grange) the future would also be appreciated.</td>
</tr>
<tr>
<td>Discouraging pre-emptive actions. There have been examples in the past of unscrupulous developers or landowners taking pre-emptive action to make a site more acceptable to development by destroying artefacts or green infrastructure which might have limited development. Is there room for a policy which denies development where such actions have taken place? This would in effect kill the “golden goose”.</td>
</tr>
<tr>
<td>Natural England recommends that there is a policy to protect irreplaceable habitats such as ancient woodland and aged or veteran trees, to ensure their protection. Natural England and the Forestry Commission have produced standing advice on ancient woodland and veteran trees.</td>
</tr>
<tr>
<td>The emergent springs in the Borough are extremely significant in that they provide clean water supply from chalk aquifers to the north. This calls for a more coherent management plan for the Borough’s ‘blue infrastructure’. Management of this Blue Infrastructure (aquifers, water courses etc) must be centrally planned and coordinated, and any new development integrated into the central plan, and cater for Climate Change predictions.</td>
</tr>
</tbody>
</table>

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### HBCs proposed way forward for Regulation 19 HBLP2036

The Council will consider the following in the production of the Regulation 19 HBLP2036:

- Whether a new policy to provide master planning for blue infrastructure is required (please also see summary table on Policy IN4)
- A requirement to protect ancient woodland and aged/veteran trees as set out in the standing advice published by Natural England and the Forestry Commission, either as a criterion in this policy or in a stand-alone policy (please also see summary table on Policy E15)

Comments where no change is considered necessary:

The Specialist Housing Analysis considers the need for self and custom build accommodation in the Borough. The Council is supportive of this way of building homes, particularly as a way for people to get on the ladder who otherwise might not be able to. However the level of CIL self-build exemptions compared to the number of entries on the Council’s self-build register shows that there is already sufficient sites coming forward to meet the need for self and custom build housing in the Borough. As such, it is not considered necessary to identify specific sites or sections of larger sites for this purpose.
Policies E15 (Ecological Conservation), E16 (Solent Special Protection Areas), E17 (Brent Goose and Wader Feeding and Roosting Sites) and E18 (Protected Species) set out the Council’s approach to the conservation and enhancement of ecology, wildlife and protected species in the Borough. These policies will be reinforced by the guidance and advice provided by the forthcoming Havant Biodiversity Strategy.

The Council does not consider it necessary to restrict the use of new builds to residents as their primary residence.

The former BAE Systems Park (Policy C9) in Waterlooville is allocated for mixed use development including leisure uses. The Council is supportive of delivering new and innovative leisure facilities which will be complementary to the town centre. In this respect, the applicant will be required to demonstrate the leisure operator demand has been fully explored in accordance with the requirements of the policy.

Paragraph 4.11 of the supporting text indicates that a key infrastructure requirement for the Borough is that “All new development needs to be served by [the] fastest digital communication technology available.”

In considering the potential suitability of sites for allocation, site assessments have informed the basis of any designation or protection - for example, the identification of land as a Site of Importance for Nature Conservation or the serving of a Tree Preservation Order. However, ultimately, the landowner is free to manage the site as they wish. Any breaches of planning control would be a matter for the development management process.
We do not accept the low level of need as established by the GTAA. We do not consider the assessment of need is sound.

Paragraph 10 of Planning Policy for Traveller Sites sets out national guidance and requires that criteria based policies should be set to guide decisions "where there is no identified need." Thus the first criterion to policy H5 which requires a need to be established before favourable consideration can be given to a Traveller site is unacceptable in its present form. Either the first criterion should be removed, or a separate policy should be added to deal with the criteria to be applied where no overriding need exists.

HBCs proposed way forward for Regulation 19 HBLP2036

The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) provides a robust assessment of current and future need for gypsy, traveller and travelling showpeople accommodation in Havant Borough, and was prepared in accordance with Planning Policy for Traveller Sites (August 2015).

Since the GTAA was undertaken, permission for a single pitch on Long Copse Lane has been granted on appeal (APP/X1735/W/3156978). This will need to be reflected in the policy in the Regulation 19 HBLP2036. Please also refer to ‘H5 - Gypsies and Travellers’ summary table.
Havant Borough Council’s Integrated Impact Assessment includes a section on the impact on Public Health and Safety. For the reasons given above, it is very clear that this development (H22 Lower Road) will have a negative impact on public safety which and hence should not go ahead.

**Evidence Base - Integrated Impact Assessment**

2 responses were received regarding this topic

**Summary of key comments raised by residents and other stakeholders**

An Integrated Impact Assessment (IIA) was undertaken for the draft HBLP2036. This showed that there would not be a disproportionate impact on any equality group, including the disabled. The Council will continue to subject future versions of the Local Plan to IIA in order to make sure that they will not have a disproportionate impact on any groups in society, including the disabled. However it should be noted that the accessibility of the built environment requires a careful approach to the issue through the planning system but also the full implementation of the Building Regulations, which is outside of the Local Plan’s jurisdiction. However, the points raised will be considered further in order to make sure that the Local Plan goes as far as possible in creating accessible new developments.
The Council’s engineering team have been involved in the drafting of the Local Plan allocations. Nonetheless, this is matter would need to be considered further at a planning application stage.

There are a number of policies, which specifically refer to the needs of the disabled such as Policy E6 High Quality Design, E7 High Quality New Homes and E1 Health and Wellbeing. These policies would apply to all developments.
Summary of key comments raised by residents and other stakeholders

For the plan to be sound as considered against the tests of soundness set out in paragraph 182 of the NPPF, the Council should ensure the following actions are taken: The full impact of the policies in the plan are included in the viability assessment.

**Town Centre Development**

There appears to be a degree of contradiction between the findings of the study and the approach to affordable housing set out in the consultation document - dense flatted schemes would not necessarily be viable even were there a requirement for 20 percent affordable housing provision. We recommend the proposed tariff for town centres is revisited.

It would appear from the Council’s evidence that 20% viability on town centre schemes could be unviable (see detailed comments about the viability margins). We would therefore suggest the Council considers a lower affordable housing target in these areas [Havant and Waterlooville] to reflect the aspirations of the plan and the evidence with regard to values and viability of such development.

**Sheltered Housing and Retirement Accommodation**

Use Class C2 care homes and extra care schemes were assessed on the basis that they would not benefit from a ‘zero’ CIL charge and would not be liable for affordable housing contributions. To create certainty and reduce potential for unforeseen viability issues, the status of such developments should be set out explicitly within Policies H2 and H4.

Concern that the weight of affordable housing contributions on retirement living or sheltered housing schemes falling into Use Class C3 could render such schemes unviable. Viability Study finds that even up-market schemes (in high-value locations within the Borough) are only marginally viable when a 20 percent tariff is sought. Such schemes would also be liable to make CIL payments.

Recommend differentiated CIL rates or affordable housing tariffs are considered for specialist forms of accommodation.

Concern that the level of affordable housing contribution for retirement and sheltered accommodation could make such developments unviable. The viability study indicates that such developments even when assessed at relatively high value points of over £4,000 per square metre are only viable at 20% affordable housing contributions in the higher value areas.

The costs of providing retirement and sheltered accommodation is distinctly higher with a high degree of common areas in such developments that are required but do not add any additional value to the units sold. The Council should carefully consider whether adjustments are needed to the affordable housing policy to reflect the different viability considerations affecting such accommodation.

The viability study has considered a limited assessment of “sheltered” or retirement housing and this type of development will struggle to meet the overall target for affordable housing and remain viable. The viability study suggests that only in the higher value areas will it be possible to even achieve the lower target for affordable housing. It would be more sensible, therefore, to set a more realistic target for affordable housing for Retirement Housing especially bearing in mind that these schemes will be developed on more difficult, constrained sites and with much higher development costs.

**Electric Vehicle Charging Points**

Strongly object to the requirements [in Policy IN3] for the provision of Electric Vehicle charging points. The Council’s viability report allows for a figure of £500 per plot for charging points and concludes this will not have an implication on viability. In our experience the installation of charging points can cost over double this amount, which would have a negative impact of viability, and could adversely impact upon a schemes ability to provide for other policy requirements, such as affordable housing.

**Low Carbon Design**
Strongly object to Policy E8 (Low Carbon Design). The policy has not been subject to the required viability tests in accordance with paragraph 173 of the NPPF.

**Space Standards**

It is necessary for the Council to demonstrate that applying the [space] standards would not affect the affordability of dwellings. The Local Plan Viability Study only considers the overall impact on viability, but applying space standards would most certainly result in oversized smaller product which in effect will result in housing provision being less affordable. The Council have not considered need or affordability.

**Solent Recreation Mitigation Strategy**

Concern that the viability study does not appear to have accounted for contributions which will be required to satisfy the requirements of the ‘Habitats Regulations’ and mitigate impacts upon the Solent Special Protection Area (SPA). It is essential that all of the cumulative developer contributions are accounted for at plan making stage. Reference to the requirements of paragraph 174 of the NPPF.

It is not clear in the viability assessment whether the financial contribution relating to the Solent Special Protection Area has been included in the assessment of viability. The most recent Solent Recreation Mitigation Strategy has increased the mitigation required - it is essential that these costs are included in any viability assessment. Whilst on their own these costs are unlikely to affect viability it is important for the full cumulative impacts of Local Plan policies to be tested, especially where viability is marginal.

**HBCs proposed way forward for Regulation 19 HBLP2036**

Proceed with Local Plan and CIL Viability Study to Regulation 19 HBLP 2036 with related clarifications and updates to the draft report. In addition, consider:

- Clarifying the affordable housing requirement for sheltered and retirement housing in Policy H2
- Whether there is a need to clarify the status of sheltered, retirement and other specialist forms of accommodation in the Draft Local Plan and the CIL Charging Schedule.
- Whether further evidence is needed to assess whether affordability in the local housing market can be maintained with the introduction of space standards
- Sensitivity testing in relation to higher energy efficiency standards as set out in Policy E8
- An assessment of the cumulative impact of individual section 106 costs

Comments where no changes are considered necessary:

The Local Plan and CIL Viability Study indicates that the affordable housing requirement within Havant and Waterlooville town centres is broadly deliverable. It is below the 30% affordable housing requirement which would apply elsewhere in the Borough, having regard to higher build costs in these locations. Recognising that viability varies in these locations, it is considered appropriate for the Council to set out a reduced affordable housing requirement as a starting point in negotiations.

In terms of CIL viability, the study recommends no differentiation be made for market-provided sheltered housing or similar developments.

The following policy considerations were included in the viability study:

- Nationally described space standard included and considered viable
- Low carbon design standards set out in Policy E8
- Electric vehicle charging points for new dwellings - makes only a marginal difference to development viability based on available information
- £3,000 per dwelling for s106 contributions - including a contribution for the Solent Recreation Mitigation Strategy in line with the newly adopted strategy
## Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th>Reference</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>H6 (Land North of Long Copse Lane)</td>
<td>Delivery will be slow due to constraints and requirement for comprehensive and coordinated masterplanning. Therefore, the site is likely to come forward in the middle to latter parts of the plan period. Trajectory over optimistic.</td>
</tr>
<tr>
<td>H7 (Selangor Avenue)</td>
<td>S106 still to be signed and conditions to be discharged first, therefore unlikely that first tranche of dwellings will be provide in 2019/20 as is suggested in trajectory.</td>
</tr>
<tr>
<td>H9 (Coldharbour Farm)</td>
<td>Planning permission has expired, and no further activities have been progressed to suggest that the site is likely to come forward quickly. Delivery assumptions in trajectory unrealistic.</td>
</tr>
<tr>
<td>H15 (Forty Acres)</td>
<td>Constraints on site and no planning application yet submitted, therefore the site will begin to deliver new dwellings more slowly than anticipated in the trajectory.</td>
</tr>
<tr>
<td>H16 (Land East of Castle Avenue)</td>
<td>Policy states that development should not prejudice potential junction improvements to the A27 therefore not deliverable until this is known. Constraints relating to access, land ownership and noise/amenity. Identified constraints may also reduce developable area. Therefore, the site is not likely to come forward as anticipated in the trajectory and may well deliver fewer homes.</td>
</tr>
<tr>
<td>H17 (Land South of Bartons Road)</td>
<td>No reserved matter application submitted. Requirement in draft policy for access to be coordinated with Southleigh which may delay delivery. Phasing assumptions optimistic.</td>
</tr>
<tr>
<td>H18 (Portsmouth Water HQ)</td>
<td>Constraints on site and complexity of delivery mean phasing assumptions in trajectory are overly optimistic.</td>
</tr>
<tr>
<td>H19 (Former Oak Park School)</td>
<td>Whilst some conditions have been discharged and existing buildings demolished, construction has not commenced, it is unlikely that first completions will occur in 2018/19.</td>
</tr>
<tr>
<td>H21 (Land West of Havant Crematorium)</td>
<td>Complications around coordination of development means that the site is unlikely to come forward in the earlier part of the plan period.</td>
</tr>
<tr>
<td>H22 (Land South of Lower Road)</td>
<td>The rigorous stipulations set out in the draft policy will require a creative design response, which will likely involve extensive negotiations with the Council. Accordingly, this site is unlikely to deliver within the earlier part of the plan period.</td>
</tr>
<tr>
<td>H24 (Car Park behind the Bear Hotel and East Street)</td>
<td>Site extensively constrained so achieving a suitable scheme design will take time. The nature of the site also likely to result in unforeseen delays and complexities and has the potential to create viability issues. Redevelopment cannot be guaranteed and if it does come forward then it would likely be in the latter part of the plan period.</td>
</tr>
<tr>
<td>H28 (Fathoms Reach)</td>
<td>As with all the allocations on Hayling Island, the site is subject to findings of a Borough-Wide Transport Assessment and the Hayling Island Highways and Transport Infrastructure Assessment. Accordingly, the site cannot be considered deliverable at this stage.</td>
</tr>
<tr>
<td>H29 (Land North of Selsmore Road)</td>
<td>Feasibility of the draft allocation remains uncertain in the absence of additional highways assessments. As such, the site cannot presently be regarded as deliverable.</td>
</tr>
<tr>
<td>H30 (Northney and Sparkes Marinas)</td>
<td>Potential tension between the proposed residential elements and the engineering/boat related employment uses. Site constrained (impact on SPA/landscape/heritage/flooding) and there is little certainty over timing and deliverability of residential dwellings at these sites.</td>
</tr>
<tr>
<td>H31 (Sinah Lane)</td>
<td>Ecological constraints and drainage issues. Doubts as to its deliverability as a result of potential highways and infrastructure capacity concerns, which have yet to be fully assessed.</td>
</tr>
<tr>
<td>H34 (Cabbagefield Row)</td>
<td>No planning application has been submitted despite being allocated for a number of years, therefore it is unlikely that the site will be brought forward quickly, with delivery more plausibly occurring during the latter part of the plan period.</td>
</tr>
<tr>
<td>H35 (Former Colt Site)</td>
<td>Site extensively constrained. Trajectory suggests first tranche of dwellings will be completed in 2021/22 however, whilst Homes England have taken over the site, a planning application has yet to be prepared and submitted. The site should not be expected to deliver new homes in the short term.</td>
</tr>
</tbody>
</table>
H36 (Dunsbury Way) - the site potentially experiences ground quality and contamination issues. No planning application has yet been submitted and therefore unlikely that first tranche of dwellings would be completed in 2020/21 as suggested by the trajectory.

H37 (Riders Lane) - despite being allocated for a number of years no planning application has been submitted, question over whether this site can be relied upon to deliver.

H38 (Former SSE Offices) - whilst the site has been cleared, no planning application has been progressed. The apparent lack of urgency infers the potential for delays, which may be to the detriment of the trajectory.

H39 (Strouden Court) - site is occupied by residential dwellings, community and retail uses. Redevelopment on a site such as this will invariably involve protracted timescales and likely requires public sector subsidy. Whilst the proposal is supported in principle, the site should not be relied upon to deliver new dwellings.

H41 (Land East of College Road) - the trajectory ignores the complexity of the site, as well as the need to progress the scheme design, undertake pre-application discussions, achieve an outline planning permission, agree reserved matters and discharge conditions. All of which is likely to take a number of years to achieve. Accordingly, we consider that the trajectory for this site is overly optimistic, and unrealistic.

H42 (Woodcroft Farm) - in view of the outstanding requirement to discharge conditions, question over whether the first 20 completions will occur in 2018/19 as the trajectory suggests.

H45 (Former South Downs College Car Park) - policy requires site to be coordinated with H41, it may therefore be difficult to bring this site forward ahead of the larger allocation to the east. If this is the case then there is potential for delay and the site wont start delivering dwellings in 2021/22 as suggested in trajectory.

H46 (Padnell Grange) - constrained site and ambiguity of the developable area of the wider site does call into question that quantum of dwellings deemed achievable. No planning application has yet been submitted for the wider development of this site despite it having been allocated for several years. Site is likely to be relatively complex and challenging to bring forward. Accordingly, we suggest that the trajectory is overly optimistic in assuming that the first completions will occur in 2020/21.

H47 (Woodcroft Primary School) - no reserved matters submissions have yet been made and it is not clear how many planning conditions have yet to be discharged. Accordingly, the trajectory is considered to be overly optimistic in assuming that the first tranche of completions will be achieved in 2019/20.

H48 (Waterlooville Golf Club) - mitigation required in relation to SINC and proximity to A3(M) meaning the developable area is likely to be limited. The timing of the site’s release will be contingent upon the business priorities of the existing occupier so unlikely that the site will be brought forward early in the plan period.

KS5 (Southleigh) - draft policy infers that the proposed allocation has the potential to deliver 1,100 dwellings within the plan period and a further 1,000 dwellings thereafter. However, the trajectory shows only 800 dwellings by 2035/36.

The SHLAA discounts 19 sites in the Emsworth area:
- Maisemore Gardens Green (EM02) is noted as having limited potential due to site constraints. It is an area of open land with at least 5 dwellings.
- Land adjacent to South Street Car Park (EM06) is noted as having limited potential. However even if a small area of the additional car park were to be included within the site it has the potential to deliver 8 dwellings.
- Greville Green Open Space (EM20) has the potential for 6 dwellings and retention of a reduced area of open space.
- Land east of 54 Long Copse Lane (UE46) could deliver 3 dwellings.

The discounted sites could deliver 22 additional dwellings.

Concern over trajectory including phasing assumptions and commencement dates. Consider that the plan would fail the test of soundness on this basis.

Land west of Emsworth (opp Brookfield Hotel, Havant Road) (UE11) - The very limited assessment undertaken via the preparation of the SHLAA seeks to dismiss the suitably of the site, without any evaluation of its sustainability. Similarly, the SHLAA evaluation gives no consideration to the extent of the harm (if any)
which development would actually cause to the AONB, bearing in mind that it is screened from the waterfront by dense vegetation.

Support for discounting Land North of Highbank Avenue (UE31) in the SHLAA on the basis that it retains the opportunity for a comprehensive development of this land in combination with land to the west, with access potential from London Road.

HBCs proposed way forward for Regulation 19 HBLP2036

The Strategic Housing Land Availability Assessment (SHLAA) forms an integral part of the evidence base that underpins the Havant Borough Local Plan. The SHLAA is a requirement identified in the National Planning Policy Framework (NPPF). It provides an assessment of land within the borough with potential for housing development by identifying sites, assessing their housing potential and considering when they are likely to be developed. It is reviewed and updated as the Local Plan progresses.

Phasing assumptions are regularly reviewed and based on up to date information that we have available, including from landowners and developers. The Council is satisfied with the phasing assumptions included in the SHLAA. Phasing and delivery assumptions will be updated prior to the Regulation 19 stage.

The trajectory (AMR 2017) shows 100 dwellings per annum for Southleigh in years 2025/26, 2026/27, 2027/28, and 800 for 2028/29 - 2035/36 giving a total of 1,100 in the plan period.

The AONB designation is a valid reason for discounting a site in the SHLAA.
### Evidence Base - Solent Waders and Brent Goose Strategy

#### Summary of key comments raised by residents and other stakeholders

The Draft HBLP 2036 contains a document entitled “Solent Waders and Brent Goose Strategy (November 2010)” as part of its evidence base. This document is a high-level strategy document which does not include any quantitative data (i.e. maps of important Brent Goose sites); as such, it does not contribute anything to the plan.

The Local Plan (Allocations Plan) (July 2014) included a document entitled “The Status of Solent Waders and Brent Gosse Strategy Sites in Havant Borough”. This document contains survey data from 2015/16; this shows much of the land in south Havant as important for Brent Geese. This information should be part of the evidence base for the HBLP 2036.

### HBCs proposed way forward for Regulation 19 HBLP2036

The updated Solent Waders and Brent Goose Strategy (2018) will be published in due course. The Draft Local Plan’s approach to the Solent Wader and Brent Goose network was based on the emerging strategy. Once published, the strategy will inform the Local Plan as part of its evidence base. The data in the ‘status of…’ study has informed the new strategy.
Questions raised over the integrity of the SA process.

It is felt that sites are looked at singularly; therefore, the combined effect is missed.

There should be an independent and critical oversight to discourage the view that the SA amounts to nothing more than a tick-box exercise.

In almost every case, the impact on green infrastructure, ecology, rising sea-levels and surface water flooding is documented as a matter to be resolved through mitigation.

The EA does not agree with many of the assessments against objective 5. The SA should be revisited once further evidence is available to inform decisions regarding the sustainability of sites in terms of flood risk.

The evidence base which underpins the plan is acknowledged as incomplete, the following need urgent action:

- Borough-wide Transport Assessment (TA)
- Hayling Island Highways and Transport Infrastructure Assessment
- Havant Borough Biodiversity Strategy
- PUSH Air Quality Assessment

H22 - LAND SOUTH OF LOWER ROAD

Any appraisal that does not identify when a line has been crossed, that rules out development options, is itself unsustainable.

The Local Plan Housing Statement (LPHS) Sustainability Appraisal showed there was no account taken of the impact on the Conservation Area. The Council's Conservation Officer confirmed he was not consulted.

A state of the art Sustainability Appraisal should include social and cultural assessments; as such, any plan that does not safeguard and/or enhance heritage assets will be less sustainable.

UE54 - SOUTHMERE FIELD

The site was identified as an "uncertain site" but is now a "discounted site" in the Draft HBLP 2036.

On 20th March 1980, a covenant was placed on the land to prevent future development; this should not be overturned.

It is sacrilege to destroy such a valued and irreplaceable piece of land with all if its diversity for houses.

There are many more pieces of land available in the Borough for house building.

The Supreme Court in April 2017 made a landmark ruling relating to cases in Suffolk Coastal and East Cheshire Local Authorities - the upshot is that out of date policies for the supply of housing would not necessarily override environmental policies.

The site contains Grade 1 (BMV) agricultural land and is used for pasture and hay. The site forms part of Langstone’s agricultural history.

The site is an ancient meadow which has not been ploughed nor artificially fertilised since Victorian times. Moreover, ancient meadows:

- Are highly threatened environments which have declined by 97% since WWII
- Are of conservation concern, as such the Wildlife Trust and Plantlife, with the patronage of the Prince of Wales, have banded together to recreate such meadowland

To support Central Government’s “Green Future: Our 25 Year Plan to Improve the Environment”, the site should remain an undeveloped meadow.

The site is categorised as “uncertain” and a Secondary Support Area for solent waders and Brent Geese in adopted Policy DM23 and proposed Policy E17 respectively.
The site’s highly diverse flora is a rich food source and attracts much wildlife, including the red-listed Curlew, Lapwing and Oystercatchers.

The UK hosts up to 25% of the global population of Curlew. In addition, Curlew:
- Have declined nationally by 64% over the last 30 years
- Are at risk of global extinction/is “globally near-threatened”
- Are listed in the Birds of Conservation Concern 4 (BoCC4) report
- Require safe high tide resting and feeding grounds
- Are found on Southmere Field far more than any other of the Langstone shore
- Are shy so will require the whole field for solitude, resting and feeding; mitigation within residential development (i.e. retention of hedgerows and trees etc) will not suffice

A Wildlife Study has not yet been carried out for Southmere.

In November 2017, the EA submitted a planning application for the managed realignment at Southmoor. The protected 9+ hectares of grazing marsh (west of Southmere) is likely to attract more birds to the area, including Southmere Field.

The managed realignment at Medmerry (West Sussex) saw the numbers of Dunlin, Curlew, Oystercatchers and Redshank increased between 2014 and 2016.

The Langstone Harbour Board responded to the EA’s application stating that high tide roost sites for wintering birds is a habitat most urgently required.

Paragraph 14 of the NPPF states that ‘Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless specific policies in this Framework indicate development should be restricted’. Footnote 9 clarifies such restrictions include Birds and Habitats Directives (Paragraph 119), SSSI and AONBs.

Paragraph 119 of the NPPF states that ‘the presumption of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitat Directives is being considered, planned or determined’.

It is not yet clear how the proposed EA managed re-alignment scheme, due to be implemented in 2018, would affect the area in terms of flooding; this will need to be monitored for some years to understand its effects on neighbouring land, i.e. Southmere Field.

The deep soil across the fields, high levels of organic matter and excellent porosity arising from the deep roots and earth worm activity means the field can return high amounts of water: the field acts as a sponge in winter and holding tank in the summer. Development would, therefore, increase flood risk.

It is believed that the pasture field west of Southmoor and adjacent to Southmoor Lane is designated as a Local Nature Reserve (LNR).

Southmoor, Southmere Field, Langstone Meadows and fields south of Wade Court/Lane form a linked network/wildlife corridor that should be preserved.

Southmere is a central part of the “green corridor” linking Broadmarsh Coastal Park with the Chichester Harbour AONB and, as such, Langstone and Chichester Harbours which are designated as a SPA, SAC and Ramsar site; the former is also an SSSI.

The Southmere Field “gap” emphasises the historic core of Langstone to the south and the predominantly post-1900 urban sprawl extension of Havant to the north.

The Mill Lane Conservation Area Appraisal (December 2017) states that the adjacent open areas form an important component of the setting of the conservation area and that the views into and out of the Conservation Area add to the character of the area.

There is an important visual and historical connection with Southmere Field and the Mill Lane Conservation Area to the south, where the associated former six-storey mill was worked until 1912. The whole field, therefore, forms the necessary setting for the Conservation Area.
The north wall delineates the northern boundary of the conservation area from the open field. This has a strong visual presence in views from Langstone Road separating the different character of these land uses.

The site makes a significant contribution to Langstone’s sense of place, local distinctiveness, well-being and identity, as well as a vital part of the setting of the two Conservation Areas of Mill Lane and Langstone.

The Landscape Capacity Assessment indicates that Southmere Field (Land parcel 41.4) has a “medium-high” capacity for development; this assessment is unreliable as it does not consider the scale of passing public, the field as a recreational gap, the Hayling Billy Line and Solent Way/Wayfarers Walk, the importance of trees and vegetation, the high quality of approaching landscapes from the east, south and west, as well as the wildlife life value. As such, the visual and landscape sensitivity of the area is “high” or “substantial”.

The Landscape Capacity Assessment has failed to understand the historical significance of the field and the link between the farmhouse to the north and Mill Lane Conservation Area to the south.

The site should be permanently deleted as it meets the criteria recorded in Policies E1, E2 and E4. These policies emphasise the importance of:
- Establishing and analysing data about air quality
- Green infrastructure to create, protect and enhance biodiversity
- Green spaces that relate and are special to the local community in terms of their beauty, historic significance, recreational value and tranquillity and/or richness of wildlife

The site is an important carbon sink helping to counter carbon dioxide emissions and absorbing some of the increasing traffic noise from the A3023.

Hampshire County Council’s (HCC) October 2014 ‘Strategy for Temporary Traffic Management at Street Works and at Works for Road Purposes A3023 Langstone and Hayling Island’ states:
- Traffic flows on the A3023 can be particularly heavy
- Any disruption to traffic flow on the A3023 within Langstone, and on the Hayling Island Bridge, impacts very quickly on other roads in the area because of the traffic sensitive nature of these routes
- Of greatest concern is the risk to traffic congestion tailing back into the A27 trunk road, leading to the hazard of stationary or slow-moving traffic on a high-speed dual carriageway

The combination of the regeneration of Havant Town Centre (KS1), Hayling Seafront (KS4) and Langstone Technology Park (KS10), along with proposed development on Hayling Island would lead to adverse impact on the wider road network around Langstone.

The Council has been informed that the site could accommodate 100 to 120 dwellings; such a scale would provide a limited scope for additional landscaping.

The SHLAA (December 2017) referenced the potential for 50 homes on the site. The loss of this greenfield site to 50 dwellings, with its excessive constraints, would be contrary to the housing density policy and could not be justified.

Development of the site would be contrary to proposed policies E10, E15 and E19 in the Draft HBLP 2036.

Development of the site would be contrary to Paragraphs 32 and 118 of the NPPF.

**UE77 - LAND AT ROOK FARM**

Too often the SA process flags up negative aspects of development whilst not fully considering the positive aspects which could be brought about through new opportunities for housing development.

The findings of the SA for UE77 are broadly comparable to other proposed allocations on Hayling Island the development of UE77 has the potential to perform strongly against a number of sustainability objectives.

**Objective 2 - Development would provide 81 affordable dwellings.**

**Objective 3 -** Although the assessment notes uncertainty regarding the safety of the proposed site access, this would be resolved through further detailed design work and a Road Safety Audit.

**Objective 4:**
- The site has excellent public transport opportunities
• Although the assessment notes that future residents are likely to be dependent on the car, this is likely to be an inevitable finding of any housing site in the Borough

Objective 6 - The Council’s Landscaping Team confirmed that they would have no objections to the site’s development when responding to the previous application on the land. The uncertainty regarding development and nearby heritage assets could be addressed through a sensitive design proposal.

Objective 8 - The strong negative assessment is strongly contested:
  • The SA has failed to acknowledge that a range of tried and tested mitigation measures could be implemented to address any impacts on common and notable species (i.e. bats, birds and reptiles)
  • Objection to the ascertain that it would not be possible to identify a suitable mitigation package to address the impact of development on a Core Site for solent waders and Brent Geese

Objective 12 - Southern Water have previously confirmed there is sufficient network capacity to accommodate a housing scheme in this location. Development would maintain the site’s greenfield run-off rate and appropriate mitigation would be provided to address any noise, water or air quality impacts.

HBCs proposed way forward for Regulation 19 HBLP2036

The Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help achieve relevant environmental, economic and social objectives. It should be stressed that the SA is an iterative process which will continue to evolve as the Local Plan continues to emerge.

Since the publication of the Sustainability Appraisal of the Draft Local Plan 2036 (December 2017), the Council has been in discussion with the Environment Agency (EA) about undertaking further evidence regarding flood risk. This information, once available, will be used to better inform the assessment of objective 5 of the SA and, as such, the HBLP 2036.

In addition to the above, the SA acknowledges that some assessments are still underway. The findings of these assessments will be used to inform further editions of the SA once they are available.

The above, together with the representations and evidence received during the consultation on the Draft HBLP 2036, will be used to inform the assessments of the next SA.

Please note, Southmere Field (UE54) was not allocated in the Draft HBLP 2036; however, the representations submitted will be used to inform any further assessments of the site in future editions of the SA as it was a site which was submitted for further consideration.
### Summary of key comments raised by residents and other stakeholders

There is a substantial amount in the document about pedestrian flow but no mention of cycling movement around the town centres.

- **Page 65 (Weaknesses, Bullet 3)** - This is not surprising, cyclists have been made unwelcome as cycle access has been made difficult.

- **Page 66 (Opportunities, Bullet 1)** - This is supported, but cyclists should also be included.

- **Page 66 (Threats, Bullet 6)** - The distances from housing in Berewood to the town centre are long for pedestrians. A split-level crossing was originally planned, without this, it will be difficult for cyclists to cross Hambledon Road and Maurepas Way.

### HBCs proposed way forward for Regulation 19 HBLP2036

The representations made about the town centres study mirror those made for Waterlooville Town Centre (KS2) and the Blue Star (H43). As such, please see the summary tables for KS2 and H43 to view the Council’s proposed way forward.
### Summary of key comments raised by residents and other stakeholders

For the plan to be sound (see Paragraph 182 of the NPPF), garden land development should not be included in the windfall assessment.

### HBCs proposed way forward for Regulation 19 HBLP2036

The Council acknowledges that Paragraph 48 of the NPPF states that development of residential gardens should not be included in historic windfall delivery rates and expected future trends. However, the paragraph also states that "Local planning authorities may make an allowance for windfall sites…. if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply". The windfall analysis shows that 7.5% (268 dwellings) of total net completions from 2006/07 to 2016/17 have been from the development of residential garden land. As such, the Council considers this as compelling evidence and justification for their inclusion in expected future windfall trends.
Summary of key comments raised by residents and other stakeholders

**Comments about Hayling Island Seafront regeneration** - please see table on 'Hayling Island Seafront (General)'.

**Concerns in relation to local road network:**
- Traffic congestion, gridlock - related journey times and delays
- Road safety - concerns in relation to visibility / road suitability, regular accidents, increase in crashes on bends and road casualty figures despite the introduction of 30mph speed limit.
- Visitor traffic during summer and weekends - need to conduct surveys during the summer
- Poor transport links
- Road links are over capacity
- Driver behaviour - not allowing cars in / out
- Roads cannot be widened without considerable cost
- Improvements to Tournerbury Lane not carried out
- Minor schemes to improve pinch points will do nothing to address the fundamental issue that the road has already reached saturation point.
- The A27 and A3023 cannot be widened and are already “clogged”.
- Has any survey been done to establish that the main road on Hayling Island can cope?

Many of the housing sites in the Draft Local Plan only appear to have one highway access point which is not acceptable as it will concentrate impacts and provides no second emergency access point. These will also cause local congestion points.

Average annual traffic flows are already in excess of Government thresholds for safe highway capacity and these thresholds are further exceeded in summer months when the Islands population increases, and additional trips are generated to access the Islands facilities. In the summer months residents already experience a minimum of 30 minutes delay in peak hours when seeking to travel to work off the Island. Delays at weekends and summer evenings can see traffic backing up along the whole length of the Islands main spine roads with delays of well over an hour experienced by residents and tourists.

The Authority should take a more holistic approach and consider what the area has to offer to its visitors and then build a robust and focused tourism strategy to deliver that vision. The 1996 partially implemented tourism marketing strategy should be revived with a focus on engendering carbon neutral sports, Sportif au Natural which would give the area a unique marketing edge. Hayling as the birth place of windsurfing could be could be used as a central theme of a wider embracing policy to encourage environmentally friendly sports.

A museum celebrating Hayling as the birthplace of windsurfing could be an excellent fulcrum and this enhanced profile will give a worldwide status to the Island.

Evidence shows there is much seasonal variation in the number of daily vehicle trips attracted to the seaside destinations and therefore the challenge is to maintain the resilience of the highway network for both residents and visitors.

Regeneration efforts will be irrelevant if visitors and residents can’t get to/from Hayling Seafront.

No sustainability assessment appears to have been produced by Havant Borough Council to consider the implications highlighted in this report in relation to congestion and air quality issues.

**Issues in relation to accessibility:**
- Need for affordable bus service
- Limited bus services
- School buses cancelled
- Need for rapid transport network
- Improvements to secondary road network
- There is no longer a railway service
• Prioritise cyclists and pedestrians
• An effective network of off road cycle ways linking to all parts of the island is essential.
• A park and (cycle ride) from Havant together with an effective ferry service to Portsmouth could
mitigate the damaging impact of an increased car visitor number on an already congested road
system. A Boris bike scheme for this link and the Island could be self funding and be encouraged.
• A specific upgrade to the footpath from the Sinah Gunsite to Hayling ferry is required to be included
in the plan.
• Need for sustainable / green transport options
• No direct bus service between West Town and Mengham
• Additional bus services may help in off peak periods but new services will be caught in the existing
peak hour congestion.

Concerns in relation to access onto the island
• Single access on and off the island cannot cope
• Adverse impact on the A3023 as a result of development
• Traffic flows already in excess of capacity and cannot accommodate further traffic growth without
very severe impacts.
• Affected by floodplain
• Single carriageway restricts traffic flow
• Rebuilding/dual carriageway would be expensive
• Delays caused by lorries / cyclists
• Potential to jeopardise access to emergency service vehicles
• Concerns in relation to condition of bridge / purpose originally intended - expect details of
refurbishment to be included in transport work
• Second access needed including a second bridge adjacent to the present one
• Need second road onto Hayling (routing suggestion made)
• A bridge network in the area of the Hayling Ferry
• A new foot / cycle bridge
• Adverse impact on tourism
• Request to see traffic surveys
• Inspector’s report on previous Local Plan recognised that “…growth on Hayling Island should be
limited/restricted, to take account of …. access difficulties on the local road network at peak hours”

Hampshire County Council recognises the transport constraints of a single road access via the A3023
Langstone Bridge onto and off Hayling Island.

Before any further encouragement of housing or tourism the road access onto Hayling needs to be widened.
Can Hayling cope with further car access without becoming gridlocked? Suggestions:
1. Widen the bridge by one lane and alternate the traffic two lanes on or two lanes off the island according to
time of day. This would need to be done in conjunction with widening the central spine road (A3023) to avoid
shifting congestion from one point to another.
2. Rebuild the railway (as DLR in London) from the old station (HIADS theatre) with frequent stops and car
parks and terminating at Havant station. A network of mini-buses feeding the railway would lessen car use.
Would people use it or still prefer to drive?
3. A complete rebuild of the bridge to include cycle, car, bus and rail lanes
4. Build a bridge on the line of the old rail bridge to take cycles, taxis, buses and emergency vehicles only
5. None of the above. Keep it difficult to get on and off to discourage further development and therefore
overpopulation and congestion.

Cycling on the island but must improved but reservations in relation to the off road north / south cycle path.
1. Will it be street lit, enabling year-round use? 2. Will the surface be gritted in winter, again enabling all year
use? 3. Will it be a fast route? If these considerations are not met, then commuters will remain on the road
especially during the winter months.
Provision should be made for cyclists alongside the road network, with weekenders still able to access the
Billy trail for a nice steady ride. The cost of developing a fast commuter route alongside the existing
carriageway could easily be recouped from the planned developments. Cycling provision should be
facilitated by widening the main road so that it will be treated in winter, street lit and maintained as the main carriageway.

The island needs an additional:
- Road bridge (i.e. West Hayling to Southsea like the Poole Twin Sails Lifting Bridge)
- Pedestrian/cycle bridge between Hayling and Langstone

There is very limited potential to enhance local roads to accommodate existing and future predicted traffic flows. Small scale junction improvements may help provide local access to new development sites but will not address the severe constraints of Havant Rad and the Island’s only bridge access.

Residents will want to know the rate of traffic increase over the years, and how the local road network will be affected once any housing, tourism and employment sites included in the Local Plan have been developed.

Detailed submission in respond of traffic conditions and impact of development.

It is not clear how any transport improvements identified on the A3023 through the specific Hayling Island transport modelling and borough wide TA will be secured or delivered.

Issues in relation to A3023:
- Speed limit recently reduced from 40mph to 30 mph
- Blind corners
- Narrow carriageway
- Visibility restricted by vegetation
- Inconsiderately parked vehicles
- Delays caused by lorries / cyclists
- Issues in relation to traffic light signals at various points
- Unsuitability of diversions via Northney Lane / Daw Lane - narrow country lanes
- Most bus stops not off the carriageway
- Adverse impact on tourism
- Need for a detailed future plan for A3023
- Traffic figures are still awaited
- Inability to cope with additional traffic must be considered in planning for additional homes
- There is nothing the Council can do to create additional capacity
- Access to the A3023 could be a reason as to why the Annual Watersports Festival has moved.

Issues in relation to West Lane:
- Blind corner adjacent to entrance on Havant Road
- Concerns in relation to amount of traffic
- Too narrow
- Need for bypass to reduce traffic through West Town

Issues in relation to cycle paths:
- Need for all weather surface on the Hayling Billy trail - not usable in wet or winter
- Improvements to cycle paths would have no significant impact on road congestion
- Plan does not reference improvements to pedestrian and cycle paths
- Suggestion for 2nd cycle route from Church Road to Northney

Parking issues:
- On-street parking
- Access for emergency vehicles
- Need for Electric Vehicle car charging points
- Trades vehicles parked on streets
- Visitors discouraged by Council run car parks
- Inadequate parking within new development

**Issues in relation to Hayling Island ferry:**
- Need for a bridge / car ferry from Southsea to Hayling Island
- Ferry is essential infrastructure
- Important for school children
- Forms part of the national cycle route
- Regular bus services to ferry essential
- Clarify HBC’s intended arrangements for ensuring the Hayling ferry can continue to run
- There is no mention in the plan of integrated transport at the Hayling Island Ferry.

**Concerns in relation to emergency services:**
- Response times - attendance in good times
- Demographic - older people with related health care needs
- Potential to jeopardise access to emergency service vehicles
- Issues for access with narrow streets and congested roads
- 11 South Central Ambulance vehicles every 24 hours
- Concerns in relation to lack of policing - crime, vandalism and speeding

**Concerns in relation to infrastructure:**
- Infrastructure should be upgraded
- Existing infrastructure is at breaking point
- Current development under construction has not been considered
- Inadequate facilities for the population size
- Services cannot manage / cope
- Transport, utilities and logistics need to form part of the regeneration proposals
- Concern that impact of development cannot be adequately mitigated

**Issues in relation to infrastructure review:**
- Further infrastructure work should be undertaken before any further development takes place / any decisions are made
- Object to publication of Local Plan before the infrastructure review is completed / plan cannot be finalised
- Concerns that the infrastructure review is taking too long
- Residents should have the ability to comment on that completed review
- Mitigation solutions should be evaluated and implemented before any further development takes place
- Need for investment in infrastructure before development is permitted
- Unique geography of Hayling Island requires specific analysis
- The evidence base will not change the problems of further development on Hayling Island
- The infrastructure plan needs to be concise and understandable, and address all the opportunities and risks and present a road map for the future of the community
- Specific concerns about the review of waste water and primary health

The Borough-wide Transport Analysis/Assessment (TA) and the Hayling Island Highway and Transport Infrastructure Assessment is the critical missing piece of the plan.

The Infrastructure Delivery Plan should consider the mechanisms for funding transport schemes on Hayling Island.

**Comments on the consultation:**
- Conducted too early - it is felt that “residents are wasting their time”
- Consultation responses not taken into account
- A further focussed consultation should be held for housing allocations on Hayling Island

**Comments in respect of the Hayling Infrastructure Advisory Committee:**
- Offers to help examination of services have not been followed up
• Concern that traffic survey was not discussed or agreed with Advisory Group members
• The Group has not completed its work, dependent upon the production and publication of Hampshire County Council’s Highways Assessment.

Hampshire County Council recognise that in the absence of the borough wide TA there is currently uncertainty as to whether the level of development proposed on Hayling Island is acceptable.

Comments in relation to approach to development on Hayling Island:
• Objections to further development on Hayling Island
• Concern there is no mechanism to stop development coming forward
• Plan will not limit or control development for the future
• Categorisation of Hayling will lead to piecemeal development and improvements to infrastructure
• Growth cannot be sustained / will put undue pressure on area
• Concerns in relation to overdevelopment
• Object to any development except for small scale infill development
• Housing development will adversely impact on Hayling Island
• Hayling Island cannot support more housing. It should be treated as a special case
• The plan lacks anything which might be seen as a core idea of what Hayling Island should be, other than a building site for new housing
• It is not supported that the housing plan has increased from 550 to 1000 new dwellings through to 2036
• The Cabinet Report (18th December 2018) states that until the uncertainties on Hayling Island and Langstone are fully answered, no further development, on top of that which has already been allocated should take place

Comments in relation to brownfield / windfall development:
• The Council has not taken windfall into account / underestimated the amount of further housing growth
• The focus on brownfield sites on Hayling is overstated; the percentage of brownfield content is tiny
• Question as to whether the accumulation of all current and anticipated “windfall” sites has been taken into account.

Impact on ecology, flora and fauna - detract visitors from the island.

Adverse impact on the Island’s character.

Suggestions that Hayling Island should be treated differently from the rest of the borough due to its unique environment.

Concerns in relation to the impact on quality of life / residential amenity of existing residents.

Loss of agricultural land/greenspace, impact on the viability of farming.

Building on greenfields in South Hayling will not enhance rights of way / footpaths - it will turn a rural walk into a rural walk through a housing estate.

Comments in relation to open space / recreation:
• Inadequate / insufficient provision playgrounds / play parks
• Lack of facilities for different groups - young people, older people, and tourists
• Community facilities mainly for older people
• Suggestions for open air music venue / cultural and entertainment centres / open town centres meeting places
• Related impact on health

Issues in relation to watersports:
• Niche market
• Expensive
• All round activity (not just the summer)
• Visitors do not use existing facilities
• A campground would encourage visitors to stay for longer
New housing is not affordable / does not meet a housing need.

**Issues in relation to education:**
- Schools operating at full capacity, not enough school places
- No space to extend Mengham Primary School
- 17 and 18-year olds forced to travel off the island

**Matters in relation to healthcare:**
- Doctors and dentist surgeries are oversubscribed - not accepting any further patients
- Concerns in relation to wait for doctor’s appointment, 2-3 week wait
- Concern that GP to patient ratio is not representative of the situation
- Concern that Queen Alexandra Hospital is not able to accommodate patients
- Ageing population and chronic illnesses mean that Hayling Island has unique requirements for healthcare
- Concerns in relation to poor air quality

**Comments in relation to shopping provision:**
- Inadequate shopping provision on Hayling Island (even now with the approved Lidl development)
- Shopping at Mengham and West Town is limited
- Banking facilities very limited
- Residents travel off the island for shopping and leisure

**Comments in relation to water supply:**
- Water pipes regularly burst due to flow and demand issues
- Holes in the road to sort water problems
- Low water pressure continues to be a problem

**Concerns in relation to electricity supply, power outages.**

**Comments in relation to waste water:**
- Concerns over sewage disposal / sewer system
- Only one pipeline off the island to the mainland
- Reliability of Victoria Road pumping station
- Pumping stations should be fitted with generators
- Concern that flood prevention projects require Government funding

**Plans to flood three areas of Hayling Island (at Tournerbury, Northney and Stoke) because of development elsewhere in the Solent means:**
- The island will be made even smaller
- It will be impossible to provide alternative habitat for wildlife

**Limited employment opportunities mean that residents have to travel off the island for work, suggestion that Hayling Island is not suitable for younger people/first time buyers.**

**Comments in relation to planning gain:**
- Community benefits should be secured alongside new development
- Developer contributions are not likely to be enough to solve infrastructure problem
- Council tax is not reinvested back into the island
- CIL should be used towards A3023 improvements
- Hayling Island hasn't seen any of the CIL money
- Developer contributions should be spent locally

**HBCs proposed way forward for Regulation 19 HBLP2036**

The council does not yet have the findings of the borough-wide Transport Assessment and the Hayling Island Highway and Transport Infrastructure Assessments which are underway. As such, there remains uncertainty as to whether strategic infrastructure issues may be an overriding constraint to sustainable development on Hayling Island and the Langstone area at this stage.
The draft Infrastructure Delivery Plan (IDP) which was published alongside the regulation 18 draft of the Local Plan, identifies deliverable solutions for 30 different types of infrastructure with the notable exception of transport. The following matters raised are considered in detail through the draft IDP:

- **Transport** - Buses, walking and cycling, and Hayling Island ferry
- **Emergency services** - Ambulance and Police
- **Green & Blue** - Open space and playing pitches, coast including flood risk management and defences, SUDS and other drainage systems, green routes including public rights of way and ecology including SPA
- **Social** including leisure (built sports facilities) and community centres
- **Health** - Primary care (GPs and health centres) and Acute care (hospitals)
- **Education** - Schools (primary and secondary)
- **Utilities** - Water supply, electricity, waste water and sewage disposal

Further evidence required:

The Hayling Island Highway and Transport Infrastructure Assessment will provide a detailed analysis of the entire highway network on the island using a microsimulation. The results of this work will enable the Council to look at measures to maintain and improve the island’s highway network functionality.

Once the borough-wide Transport and Hayling Island Highway and Transport Infrastructure Assessments are completed, the draft IDP will be updated to reflect and incorporate the recommendations from the transport analysis.

A sub-regional assessment of air quality following proposed development is underway which will examine the impacts on human health and European sites.

The emerging Havant Borough Playing Pitch, Sport and Recreation Strategy will provide an assessment of the borough’s sport and recreational facilities, and will inform the revised version of the IDP. Investigate whether there is a need for additional research in respect of tourism and the visitor economy.

In addition to the above, the following policies in the Local Plan set out how proposals should respond to site-specific impacts through the development management process:

- Impacts on the local road network, using the microsimulation model (IN3)
- Ecology (E15)
- Flood risk and drainage (E12 / E13)
- Landscape and Townscape (E10)

Comments where no change is considered necessary:

As set out above, a draft version IDP was published alongside the regulation 18 draft of the Local Plan. The Council considered it necessary to consult on a draft version of the HBLP 2036 and IDP in advance of the transport work being complete for a number of reasons including:

- The existing Adopted Local Plan is out-of-date
- The Council does not have a five-year supply of housing
- Developers are already proposing development and looking to submit planning applications - such as the recent Developer Consultation Forum at Sinah Lane
- An appeal inspector (reference 3155488) was able to acknowledge the Council’s progress on the Local Plan and its positive approach and dismissed the appeal as a result. Maintaining progress on the preparation of the Local Plan puts the Council in the best position to manage speculative development prior to the Local Plan’s adoption.
The Draft Local Plan clearly acknowledges the unanswered questions on transport, and indicates that development proposals on Hayling Island and Langstone should continue to be resisted. The site allocation policies included within the Draft Local Plan are only intended to provide a starting point on the detailed points that should be considered on the site, and do not change the Council's position that development proposals on these sites should be resisted whilst uncertainties remain regarding transport. There is a large text box above every proposed allocation on Hayling Island setting this out.

The purpose of the Hayling Island Infrastructure Advisory Committee is to provide on the ground advice regarding infrastructure capacity on Hayling Island. Forthcoming meetings will have the opportunity to review the emerging findings of the Transport Assessment and sub-regional assessment of air quality.

Matters relating to transport and parking in new developments are considered as part of Policy IN3. The management of the Council's car parks is not a matter for the Local Plan.

The council has considered sites across the borough for allocation. Given the high housing need, it is not possible to avoid greenfield allocations.

When considering which greenfield sites are suitable for allocation, the council has sought to prioritise sites of a lower agricultural quality. However, the available evidence is that the majority of land in the borough is of the best and most versatile quality (BMV). Therefore, the allocation of housing sites on BMV is unavoidable if the borough is to meet its housing need.

In seeking to provide access to good-quality open space, Policy E2 also requires new open space alongside residential development of over 50 dwellings. Where larger allocated sites on BMV, the Draft Local Plan identifies a need for the development to include community growing provisions such as allotments as part of the open space provision in line with Policy E19.

Policy E1 promotes public health and enable people to live a healthy lifestyle by seeking to retain open spaces, including children’s play spaces, which are valued by local communities.

Housing affordability continues to be a significant challenge across the borough, including Hayling Island. There is a need to increase the supply of homes to keep pace with the need for housing. Policies H2 and H3 set out the Council’s approach to securing homes of the right size and tenure, whilst Policy E7 sets out how the Council will secure suitable homes for a wide range of occupants.

Developer contributions towards local infrastructure are secured through a combination of section 106 planning obligations and CIL. In terms of the latter, all developers are required to pay a proportional charge which is used towards the cost of infrastructure provision needed to support the development of the area. CIL is used to fund additional infrastructure at a borough wide scale, although there is freedom for a proportion of CIL to fund smaller neighbourhood projects as well. The viability of the plan policies, alongside CIL is considered in detail through the Local Plan and Viability Study.
Is there another site which should be noted as a Local Green Space?
35 responses were received regarding this topic

<table>
<thead>
<tr>
<th>Summary of key comments raised by residents and other stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Please also see table on ‘E4 - Local Green Spaces’.</strong></td>
</tr>
<tr>
<td>All allotments in the borough.</td>
</tr>
<tr>
<td><strong>Southleigh Strategic Site</strong></td>
</tr>
<tr>
<td>The eastern edge, and north to south of the strategic site, Southleigh.</td>
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<tr>
<td>The green strip through the centre of the Southleigh development - extending from Hollybank Woods.</td>
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<tr>
<td><strong>Emsworth</strong></td>
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<tr>
<td>The western corridor of the River Ems - fields between Westbourne and Emsworth.</td>
</tr>
<tr>
<td>Southleigh Road Recreation Ground.</td>
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<tr>
<td>Horndean Road Recreation Ground.</td>
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<tr>
<td>The Old Hospital Garden at the Victoria Cottage Hospital site.</td>
</tr>
<tr>
<td>Warblington Road allotments.</td>
</tr>
<tr>
<td>Allotments off Washington Road.</td>
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<tr>
<td>Redlands Grange allotments.</td>
</tr>
<tr>
<td>Victoria Road allotments.</td>
</tr>
<tr>
<td>“The Horse Fields”- opposite the Brookfield Hotel / fields south of the A259 which form part of Warblington Farm.</td>
</tr>
<tr>
<td>Fields along the Solent Way between Emsworth and Warblington (H23F and H23E).</td>
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<tr>
<td>Land around Warblington Church and Farm (H23C and H23D).</td>
</tr>
<tr>
<td>Southleigh Park.</td>
</tr>
<tr>
<td>Redlands Grange allotments and Warblington Road allotments at Washington Road.</td>
</tr>
<tr>
<td>Ems Valley Corridor (East Hampshire Strip/Sussex Border Path) including field east of Westbourne Avenue.</td>
</tr>
<tr>
<td>Land at Westwood Close (Policy H10) - also see ‘E4 - Local Green Spaces’ summary table.</td>
</tr>
<tr>
<td><strong>Leigh Park</strong></td>
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<tr>
<td>Stone allotments.</td>
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<tr>
<td>St Clares Wood, off St Clares Avenue</td>
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<tr>
<td><strong>Waterlooville</strong></td>
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<tr>
<td>Purbrook Woods, off Purbrook Heath Road</td>
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<tr>
<td>Gundymoor Wood, off Purbrook Way</td>
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<tr>
<td>Covert Grove (also known as Frenstaple Woods), off Frendstaple Way</td>
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<tr>
<td>Stakes Coppice, off Holst Way</td>
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<tr>
<td>Hurst Wood, off Dornmere Lane</td>
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<tr>
<td><strong>Hayling Island</strong></td>
</tr>
<tr>
<td>Hayling Billy Trail</td>
</tr>
<tr>
<td>Stoke Common and Stoke Woods</td>
</tr>
<tr>
<td>Northney Recreation Ground</td>
</tr>
</tbody>
</table>

245
<table>
<thead>
<tr>
<th>Land east of Footpath 102, including Tournerbury Golf Course</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing agricultural land to east and west of Northney village and Copse Lane</td>
</tr>
<tr>
<td>Existing agricultural land to east and east of A3023.</td>
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</tbody>
</table>

**HBCs proposed way forward for Regulation 19 HBLP2036**

The Council will consider the suggested sites and whether they should be designated as Local Green Spaces as defined by Policy E4 in the Regulation 19 HBLP 2036.

It should however be noted that the NPPF is clear that the designation should only be used where it is not an extensive tract of land (paragraph 77).
### Sites Not Included in the Plan

15 responses were received regarding this topic

#### Summary of key comments raised by residents and other stakeholders

<table>
<thead>
<tr>
<th><strong>Sites put forward for housing</strong></th>
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<tbody>
<tr>
<td>Hayling Island College Sports Field, Church Road, Hayling Island should be considered for residential development. Adjacent to UE47 so could add value there.</td>
<td></td>
</tr>
<tr>
<td>Southmere Field (UE54), Langstone should be considered for inclusion in the HBLP2036.</td>
<td></td>
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<tr>
<td>The old Post Office site on East Street would be an excellent location for older peoples housing.</td>
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<tr>
<td>Brockhampton West should be considered for employment uses.</td>
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<tr>
<td>Hazelton Wood (UE8), Cowplain should be considered for inclusion in the HBLP2036.</td>
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<tr>
<td>Rook Farm (UE77) should be considered for inclusion in the HBLP2036.</td>
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<tr>
<td>Mengham Estate (proposed extension to H29 Land north of Selsmore Road) should be considered for inclusion in the HBLP2036.</td>
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<tr>
<td>Land south of Long Copse Lane (UE46) should be considered for inclusion in the HBLP2036.</td>
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<tr>
<td>Land south of Havant Road (UE11) should be considered for inclusion in the HBLP2036.</td>
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<tr>
<td>Land North of Oysters, Hayling Island should be considered for inclusion in the HBLP2036.</td>
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</tbody>
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<table>
<thead>
<tr>
<th><strong>Sites put forward for employment</strong></th>
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<tbody>
<tr>
<td>Brockhampton West should be considered for employment uses.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Sites put forward for housing and employment uses</strong></th>
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</tr>
</thead>
<tbody>
<tr>
<td>Land at Hulbert Road (UE69) should be considered for inclusion in the HBLP2036.</td>
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</tbody>
</table>

#### HBCs proposed way forward for Regulation 19 HBLP2036

The suitability of the following sites for inclusion in the Regulation 19 HBLP2036 should be considered:

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

Comments where no change is considered necessary:

Whilst the Council would welcome the inclusion of the old Post Office site on East Street, the Council would need evidence to demonstrate that the site is available i.e. from the landowner/agent, in order to consider it for inclusion in the Regulation 19 HBLP2036.
<table>
<thead>
<tr>
<th>The way we are running the consultation</th>
</tr>
</thead>
<tbody>
<tr>
<td>36 responses were received regarding this topic</td>
</tr>
</tbody>
</table>

### Summary of key comments raised by residents and other stakeholders

#### General
- The Council does not wish to have lots of feedback on the Local Plan.
- Consultation is a tickbox exercise.
- Responses to previous consultation responses not taken into account.
- The Council has made it difficult to respond - this has happened before and will happen again.
- What was the point of the consultation evenings? The vast majority of people have been ignored.
- Consultation orchestrated and weighted in HBC’s favour.
- Impossible to assimilate all the information during the consultation period.
- Comments on the Draft Local Plan should bring about final changes to the document.
- It should be shown that my and other local stakeholders feedback how you’ve taken this on board (rather than just tell us you have). Bring some trust back into our local politicians. We are not against change as residents, we just want the right kind of change and, as taxpayers who pay the salaries of our politicians and civil servants, our views treated with respect and real consideration.
- Unfulfilled assurances and promises on other projects/policies, and subsequent changes to planning details after approval, leave local stakeholders with a mistrust and lethargy for the system, so also consult and publicise fully any subsequent changes.

#### Use of website
- There is lots of detail and supporting evidence online.
- The consultation excluded those who do not have access to the internet.
- Difficult to make comments without access to a computer.
- Older people do not have computers.
- Could not find booklets on the website.
- Local Plan is very difficult to view on a home computer, tablet or smartphone.

#### Online survey questionnaire
- Found the online consultation survey difficult / unwieldy to use - think of an alternative app for next time.
- Serious flaws in the way the survey is being conducted on the Council’s website.
- Concern that people are restricted to responding to specific aspects of the plan - there should be an opportunity to respond generally to the plan. Deliberate ploy to put people off responding.
- Digital questionnaire makes it harder to comment on the whole of Hayling Island.
- Feedback forms unwieldy and not addressing the “umbrella” view.
- The questions are purposely asked in a way that the Council wants them to be answered.
- Concern that people do not have computer skills to complete online survey.
- The portal is an unwieldy vehicle to obtain individual views on the draft Local Plan.
- The question needs to be reworded as it suggests the plan is going ahead. It would read “Assuming the plan is approved what change would you like us to make to improve the plan.”
Libraries
Plan was behind the main desk in the library where no one could see.
There is no advertising to tell people plan is there and asking for feedback.
No display in libraries indicating booklets and draft Local Plan available.
The booklets were in a ring binder with the plan rather than separately.

Mailout
Local Plan mailout did not provide information about where or when the draft plan could be viewed - such as it being available in the local library.

Advertising the consultation
Concern that many people were unaware of the consultation taking place.
The council has not advertised the consultation repeatedly or widely enough.
There was nothing in the ‘Serving You’ publication.
All households should be notified of the public consultation.
Residents unable to respond to consultation they don’t know about.
Unaware that exhibitions were taking place.
If HBC planning policy department was a private company it would go out of business because not enough people know they exist.

Site Notices
Few poorly placed and weather-beaten site notices.
Comments in relation to site notices for H48 - Land at Waterlooville Golf Club:

- [Only] a small site notice on a lamp post on Anvil Close to make residents aware seems to be very poor communication and underhand.
- The development will affect every resident in Anvil Close and will directly impact on our property.
- Most residents unlikely to see site notice on Grassmere Way unless they were on foot. Concern expressed in relation to method of notification.

Exhibitions
The exhibition was very comprehensive, and staff polite and helpful.
Good impression from exhibitions - much money had been spent on this and considerable work done.
Representatives were very helpful and helped us to understand the local plan.
Clear and patient explanations were given.

[Portsmouth City] Council is grateful that a local plan consultation event was held within the city boundary at Farlington to provide an opportunity for Portsmouth residents to discuss the emerging Plan.

Older people unable to attend viewings due to transport.
Reading brochures/material in a noisy environment difficult.
The layout of the information boards was clear and easy to read.
The maps at the exhibition did not show two recent major developments on Hayling Island on the display maps.

The exhibition boards have a simple idea of what was planned, there were no key numbers and were squashed into diagrams/maps.

Advised printed copy of the exhibition banners were not available to take away.

‘Where Next for.....?’ Booklets
An overarching booklet of the strategy plus separate booklets for each areas would have been more widely read.

Booklets useful but few copies were available for the public to take away.

There were no brochures available to take away.

Booklets are helpful but just a summary of the full draft.

Exhibition Venues
Meridian Centre exhibition away from public footfall - leaflets could have been given out to public on the ground floor.

There was no exhibition in Old Bedhampton - suggested venues during the consultation period but was advised that it was “too late” to arrange a further exhibition. Concern that the Bedhampton community who do not drive or do not have access to the internet have been excluded.

A more public and accessible venue could have been found than The Church of the Resurrection.

Resident and other community group meetings
Presentations and road shows from officers at residents’ gatherings help.

Presentation in Emsworth good and HBC officers very helpful - 2 weeks to respond after the meeting was not long enough - not enough time to look at the plan in detail.

More should have been done to engage the public at interactive events led by local councillors.

Draft Local Plan consultation document
The present format is not user friendly.

The 300 page document is a formidable challenge for any individual but especially elderly residents.

Local Plan is very large with complicated maps.

It would be clearer if the actual policies were prefixed with ‘Policy’.

The legal status of ‘How this Works’ section should be clarified.

Locations of site allocations are difficult to determine by their description.

Concern that the draft Local Plan draws on the Housing Statement which was not subject to the same consultation processes required of a Development Plan Document such as an Examination-in-Public by an independent Inspector.

Evidence base
Impressive library of comprehensive documents.
The absence of a Transport Assessment is regrettable - residents should see this prior to the Pre-Submission draft.

An incomplete evidence base means that the consultation is compromised and invalid.

**Hayling Island**

It would be more helpful to have a complete plan just for Hayling to include all the infrastructure review.

HBC have failed with regard to Hayling Island in terms of outreach to young people, loss of tourist office is a missed opportunity for consultation with tourists, and lack of engagement with schools/colleges in promoting Hayling Island as an educational resource.

Information about the sustainability of Hayling Island was unavailable.

Time consuming to locate areas of the plan specific to Hayling Island - information buried in the 359-page document.

**Suggestions to improve the consultation**

Leaflet drop would be helpful.

No information in the local newspaper - a page in a local publication would be helpful to make residents aware.

Ward councillors did not publicise the exhibition and exhibition with information through the letterbox - the residents’ associations, Friends of the Earth, HBRA and CPRE Hampshire worked hard to publicise exhibitions and informed residents of local issues in the draft Plan and advised them how to respond.

HIRA always happy to post on social media, website, in the Islander as well as putting up posters on the Mengham Notice board.

Feedback forms would be helpful.

What strategy has been established to reach those still in education at secondary and sixth form level?

The next draft should show the changes made to the Jan 2018 version to make it easier to comment on.

Cabinet meeting was held the week before Christmas making it difficult for many people to attend.

**HBCs proposed way forward for Regulation 19 HBLP2036**

This was the first time the Council has consulted on a full version of the Draft Local Plan (Regulation 18) following consultation on the Draft Local Plan Housing Statement (LPHS). Though a number of respondents raised concern that it was not widely publicised enough, there was a good response to the consultation.

There is considerable flexibility open to local planning authorities in how they carry out the initial stages of plan production, provided they comply with the specific requirements in regulation 18 of the Local Plan regulations on consultation. These can be summarised as follows:

- Notify certain bodies (that the LPA consider may have an interest in the subject of the local plan), and invite representations about what the plan should contain
- Notify and issue information to specific and general consultation bodies (as the LPA considers appropriate)
- Notification to residents and businesses as the Council considers appropriate.

Statutory consultees, organisations, residents’ associations and other community groups were notified of the Draft Local Plan consultation as specific and general consultation bodies. Individuals and organisations on the local plan mailing list were notified, including those previous respondents to the Draft Local Plan Housing Statement consultation via email / letter. The written notification included detailed how interested
individuals/organisations could get involved with the consultation, including details of the public exhibitions, where copies of the Draft Local Plan and consultation materials were available to view, and how to respond to the public consultation.

As part of the consultation methods set out below, the Council produced high quality tiered content to ease accessibility into the Draft Local Plan such as the ‘Where Next for….?’ booklets. Such consultation materials are over and above the minimum statutory consultation requirements set out above, but the Council recognises the Draft Local Plan is a technical and complex document.

The Council engaged widely using a variety of different methods over and above the minimum consultation requirements within budgetary constraints, in accordance with its commitments in the Statement of Community Involvement:

- **Council website** - The Local Plan page on the Council's website was regularly updated in advance of, during and following the close of the consultation with a copy of the consultation document, and supporting material including evidence base documents were clearly signposted. The Local Plan page also provided clear instructions on how to respond to the consultation via the online survey, email and post.

  - **Exhibition/Displays** - Residents were invited to attend nine exhibitions throughout the borough. A series of banners were on display with Council officers on hand to listen to concerns and answer questions from members of the public. Hard copies of the consultation material, and the evidence base documents were also available to view.
  - **Press Release(s)** - On the Council's website as well as local newspapers.
  - **Social Media** - A Facebook campaign to promote the consultation on the Draft Local Plan, including posts encouraging residents to attend public exhibitions being held across the borough during the consultation period.
  - **Leaflets** - A summary leaflet explaining how residents and businesses could get involved together with a series of 'Where Next for….?' booklets summarising key aspects of the Draft Local Plan were made available on the Council's website, as well as hard copies being available at the Public Service Plaza, all libraries at the borough and the public exhibitions.
  - **Community Networks/Forums** - Council officers attended and presented the proposals at a number of different community and resident association meetings and were available for questions following this.

In addition to the above, site notices were displayed on or close to the site of all the draft allocations proposed in the Draft Local Plan, throughout the consultation period publicising the consultation and details of the public exhibitions.

The Council would also generally include an article in the Serving You magazine which is delivered three times a year to every household in the borough (Spring, Summer and Winter). There was no publication date within the consultation period - however, a short item highlighted the forthcoming public consultation on the Local Plan in the New Year in the Winter 2017 edition, another short article on the consultation included in the Spring 2018 edition of the magazine.

A number of respondents felt the online survey was overly prescriptive. However, Council officers have however considered each and every comment submitted in response to the consultation, including representations received via the online survey, email and by post.

The online questionnaire was designed to gather meaningful and constructive feedback on the Draft Local Plan. The format of the online survey therefore encouraged respondents to comment on the specific wording included in the plan to inform the Regulation 19 version of the plan. This was deliberate bearing in mind the technical nature of the Regulation 19 consultation will need to focus on the ‘soundness’ tests set out by Government.
At the Regulation 19 stage, the Council will consider publishing a ‘tracked changes’ version of the plan to show how it has been updated from the Draft Local Plan.

For the purposes of the next Regulation 18 consultation, consider the following:

- Promote the consultation in the borough’s libraries using posters and other displays and make a small poster generally available to resident’s groups, community centres and others to display.
- Making copies of ‘Where Next’ booklets, or other similar material, available to take away.
- Encourage members to promote the consultation.
- Improve the legibility of the consultation document including the site plans.
- Publish a copy of the local plan with tracked changes shown (this could also be relevant at the Regulation 19/pre-submission stage).
- Further engagement with young people.
- Reconsider exhibition venues
Appendix 1
Site plans of sites not included in the plan