

1 Background to a meeting between HBC Planning and HBRA

On 28th July 2022, Havant Borough Residents' Alliance representatives met with

David Hayward	HBC Planning Policy Manager
Emma Chisnall	HBC Planning Services
Caroline Harvey	HBC Insight Manager
Elizabeth Lloyd	HBC Cabinet member Councillor
Simon Rowberry	Interim Head of Planning & Building Control

The subject of the meeting was the Havant Borough Local Plan, now in development.

In his invitation to the meeting, David had asked for details of topics that HBRA members would like to discuss. The HBRA representatives met on 15th July to review and confirm the high level topics for discussion and response. These were subsequently detailed to David in individual emails ahead of the meeting, as questions with supporting information.

This document includes a consolidated list of the questions emailed directly to David Hayward together with details of the members present:

Iain Fairley	Bedhampton Heritage Alliance
Caroline Dibden	CPRE Hampshire (Apologies received)
Charles Ashe	Emsworth Residents' Association
Ann Buckley	Havant Borough Residents' Alliance
Bob Comlay	Havant Civic Society
Pat Brooks	Havant Climate Alliance and Friends of the Earth
Anne Skennerton	Hayling Island Residents' Association
David Pattenden	Langstone Residents' Association
Jim Graham	North Hill Bedhampton Residents
Andrew Hunnibal	Save Long Copse Lane
Andrew Norton	Warblington and Denvilles Residents' Association

Given the breadth of the subject matter of the questions, which spanned not only the Local Plan but also its context relative to other HBC work streams for example Regeneration and Economy, some of the responses were deferred for subsequent response.

Bob Comlay took an action from the meeting to provide this consolidated document drawn from the content of the individual emails, and **David Hayward** took the action to review this document and confirm how and when the HBC responses to the individual questions in the document will be documented.

In response to HBRA representatives' request for follow up meetings, Cllr. Elizabeth Lloyd and Insight Manager, Caroline Harvey, agreed with this continuing dialogue. HBRA members expressed their willingness to engage, individually or as a group, at all stages of the Local Plan's delivery, in order to contribute to its effective delivery.

2 Havant Residents' Alliance - Ann Buckley

2.1 *Question on consultation and engagement*

How will HBC undertake effective consultation on the Local Plan this time? The revised Statement of Community Involvement relies now much more on digital communication. The borough has many residents who are excluded from access to the internet. Will hard copies of the consultation documents be available in public places along with paper response forms? As the Local Plan is a major issue could you time the consultations to meet Serving You publication dates?

2.2 *Question on working with PCC*

Are there ways that HBC can work better with Portsmouth City Council who are a major landowner and landlord in the borough? PCC were not present at the Examination in Public when the Inspector put questions about their sites in the Plan.

2.3 *Question on self-build*

HBRA have long pushed for including self-build on the Local Plan and the Inspector supported this. At the EiP it was agreed that HBC would look into if any of PCC's underused garage forecourts could be used as possible self-build development land. How has this progressed?

2.4 *Question on demographic change*

Recent census data indicated that the over 65 population in Havant Borough has increased by 18.8%. How will this influence the Local Plan?

2.5 *Question on affordable Housing*

HBC has massive unmet need for social housing and the largest proportion of deprived wards in Hampshire. Although details are not available yet HBRA welcomes the proposal for HBC to set up a Housing Company. How will HBC planning department work with the Registered Social Landlords during plan preparation?

3 Emsworth Residents' Association - Charles Ashe

3.1 Housing delivery - What total are HBC aiming for in the new LP and by when?

Havant's Housing Delivery Position Statement, March 2022, has a total of 4394 dwellings.

It also seems in the HDPS that sites that the Examiners questioned as to their capacity are again mentioned with the original housing figures in the last LP.

For instance: Havant Town Centre is shown with an indication of 721 dwellings

Waterlooville Town Centre with a total of 600

Campdown with 650

The Interim Report of the Independent Examiners last summer stated that for those three sites –

1. The prospects for Havant Town Centre achieving that figure were considerably doubtful.
2. With Waterlooville, it was unclear how 335 dwellings of the total could be delivered.
3. With Campdown, the Examiners found that the site was neither developable or deliverable according to the NPPF, and so should be removed from the anticipated delivery.

So what has changed? Or are Havant just repeating the same figures with no real prospect of how they can be achieved?

Then there is the Southleigh site, which the Examiners thought unlikely that it could be delivered within the time of the Local Plan. What is the position now? Have Havant done any work on this?

Finally, I see that in Long Copse Lane, the anticipated number has increased again to 260, from 210 which the applicants have, apparently, planned for.

So which is it?

4 Langstone Residents' Association - David Pattenden

4.1 Housing targets in the context of the 2021 Census data

To ensure the revised Local Plan uses sound data, and given the 2021 Census provides some interesting statistics about population growth in Havant and our neighbouring Boroughs, will the Partnership for Urban South Hampshire (PUSH) be reconvening to review the Objectively Assessed Need (OAN) for the housing targets in Havant?

The Strategic Housing Market Assessment was published in 2016, so it must need updating recognising the growth in population of Havant has only been 2.9% and not the 4% used before, just 1.5% in Portsmouth and a drop in Gosport of 0.9%.

5 Save Long Copse Lane - Andrew Hunnibal

- 5.1 *With the emphasis on initiatives like 10 Minute Living, 20 Minute Neighbourhoods and greater protection of biodiversity will sites like H8 LCL be viable as candidates for the next local plan?*
- 5.2 *At the Stage 1 hearings the Inspector was critical that the Council had not done more to progress the strategic Southleigh site. What has happened since then to address this?*
- 5.3 *Will larger sites need to include plans for Nutrient Neutrality? If so, how will proposals be judged for their suitability?*
- 5.4 *Chichester District Council have an agreed statement of common ground with Southern Water and the Environment Agency. This acknowledges the issues of capacity at the Thornham Waste water treatment works. Why has HBC not jointly signed this statement or agreed its own statement with Southern Water and the Environment Agency?*

6 Havant Climate Alliance / Friends of the Earth - Pat Brookes

- 6.1 *Will the new Local Plan demand that developers build new homes to zero-carbon standards where possible as East Hampshire propose to do in their emerging Plan?*

Example of Reading who require all new residential developments of 10 or more homes to be built to as near to zero-carbon standards as possible. During the Local Plan examination they were able to persuade the Inspectors of their case. They found that resistance from developers was less than feared. (I have more details about this). We know that Havant expects new homes to be well insulated, but as the sunniest part of the UK we should also expect all new homes to be built with Solar PV or Thermal plus the option of Heat Pumps or District Heating.

- 6.2 *Will Havant at least apply a minimum standard of 30% carbon saving over current minimum standards, rather than 19% as previously proposed?*
- 6.3 *Will HBC be committed to employ more enforcement officers to ensure overall building quality in the borough?*
- 6.4 *Will the Local Plan be looking at the cumulative impact on biodiversity, of the development of all green field sites in the Borough?*

In the previous Local Plan sustainability included an assessment of how a given development might impact on other local sites, individually. However, if all recent and intended developments were looked at together, the impact of all the land lost might outweigh proposed mitigation. This is particularly relevant in the case of foraging and roosting land that will be lost to Brent Geese and Waders. They seek wide open fields where they can look out for predators. Smaller areas of nature reserve will not adequately compensate. On this basis one could argue that the whole of Hayling Island should be treated as a special case because of its particular position between the 2 AONB, RAMSAR etc. harbours. e.g. no large scale developments should be allowed, and there should be a cap on small developments (which would also address the traffic issues).

7 Warblington and Denvilles Residents' Association - Andrew Norton

7.1 Question on piecemeal Development

Councillor Clare Satchwell's foreword to "A new Local Plan for the borough" states "[The Local Plan] will provide critical infrastructure to meet the **existing and future** demands of society". HBC helped draft the PUSH Spatial Policy Statement in 2016 which identified the new infrastructure which should "be assessed as an integral part of the preparation of Local Plans". The draft 2019 HBC Local Plan subsequently identified some of the necessary infrastructure improvements for the Borough, and these were further considered in the 2020 Infrastructure Delivery Plan. Could you please update us on where the current infrastructure delivery plan stands in terms of proactively delivering infrastructure in a timely manner across the borough and in particular whether funding is secure for all the short-term measures? In the short term, will piecemeal development being pursued by developers, for which infrastructure is frequently considered in isolation, jeopardise the Council's ability to provide the necessary borough-wide, indeed integrated South Coast, infrastructure?

8 Hayling Island Residents' Association - Anne Skennerton

These questions relate to Transport concerns particularly focussed on the A3023 on Hayling Island and through Langstone up to the A27 roundabout.

8.1 Question on Hayling Island transport issues

Noting that the new Local Plan for the borough Decision Making Principle Number 3 (Housing Delivery Position Statement) requires all new development on Hayling Island and Langstone to address the transport issues raised by the Inspectors, my question covers:

- 1) What exactly is the methodology and its data base being used, and what is the "further work" that has been identified to improve it (ref. Housing Delivery Position Statement 2.20)?
- 2) Residents strongly feel that 2.21 requirements should specify inclusion of all peak time data whenever that occurs in order to provide realistic safeguards against "severe transport impact". The current wording is too ambiguous to provide realistic safeguards.

8.2 Principle Number 3 – Clarification required

Regarding the statement under Principle Number 3 “other than those where the principle of development is supported by the Development Plan” please will you clarify exactly what is meant by this as it appears to contradict or even undermine the line before it.

8.3 Question on severity of highway safety impacts

Regarding the statements:

- “There will not be an unacceptable impact on highway safety; and
- The residual cumulative impact on the road network will not be severe.”

Please will you specify what constitutes “unacceptable impact” and “severe” in this context?

8.4 Question on reduction in private car dependency

In terms of population now and evolving, together with changing Government road transport policy towards the cyclist & pedestrian, how will the Local Plan integrate a reduced private car dependency for Hayling Island’s 18k-20k (including 2k seasonal visitors throughout the year) population to make it practical (i.e. safe for young and old) to commute around the Island & through Langstone’s A3023?

Reference for 8.4 above: SE Hants. Clinical Commissioning Group identified Hayling Island as having the largest proportion of elderly and infirm residents in SE Hants. Statistically Havant as a whole is the 15th most densely populated borough in England and Wales (Office National Statistics 2021 published June 2022) but its infrastructure especially its road network and dedicated cycling provision has not kept pace with this population. Yet more densely built housing developments continue to add to the private & service vehicles without any broader dedicated cycling transport routes.

9 Havant Civic Society - Bob Comlay

Employment Areas in the Local Plan:

The current allocations for Employment Areas no longer enable clear differentiation between sites suitable for ‘edge of town’ use (e.g. Langstone Park, Dunsbury Park, Hermitage Park and

Brockhampton West) and ‘town centre’ sites unsuited to occupiers with significant traffic generation and antisocial business hours.

The New Lane employment area now occupies a residential ‘town centre’ context, completely separated from the Strategic Road Network (SRN) by a small number of heavily-used railway

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crossings and densely populated residential streets. As a 'town centre' employment area, with easy access by rail, bus, bicycle and foot, it would be perfectly suited to modern, green manufacturing and technology uses with net zero commuting and no net generation of new traffic.

However, the recently approved development of a 24/7 distribution hub operation on a prime New Lane site highlights residents' concern over the lack of effective coordination between borough, county and national traffic authorities. National Highways were not even consulted in this case, despite the applicant's statement that 95% of the traffic generated by the site operation would be heading directly to the nearest A27 and the A3(M) SRN junctions.

Future employment development at Dunsbury Park, which has available space and excellent SRN connectivity, now appears to be reserved exclusively for future development projects supporting delivery of as yet uncertain Freeport benefits.

Brockhampton West, another site with ready access to the SRN, was recently sold by HBC and marketed as Solent Distribution Park. We now learn that the site is earmarked for potential development by Southern Water under a Development Control Order from the Secretary of State, the type of plant proposed being highly automated and low in employment value.

- 9.1 How will the new Local Plan redefine the borough's employment areas to attract the high quality sustainable employment opportunities that are needed to raise standards of education and levels of achievement across the borough while maximising net zero commuting and minimising through traffic in town centres?*
- 9.2 The NPPF states that to promote sustainable transport, 'transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impacts of development on transport networks can be addressed'. How will HBC work better with HCC Highways, National Highways, PCC and the Solent Freeport management board to ensure that existing gaps in consultation coverage are closed and that the NPPF requirement to promote sustainable transport can be achieved?*

'Master planning' for traffic management:

When a planning application is approved, the impact of its load on the local road network is only considered against the *current actual* traffic loading, often using *historic* data as a base, and without consideration of the *cumulative predicted* load from ongoing and approved future developments which will impact the same junctions.

For example, approval was given this month for a new Lidl store at the B&Q site on Purbrook Way. The traffic assessment for that application did not take into consideration the predictable increase in traffic at the Asda roundabout from the new housing approved for Hulbert Road, from the likely development of 650 houses at Campdown, or from the 40% of new traffic generated from the New Lane site expected to pass through Purbrook Way to Junctions 4 and 5 of the A3(M).

The junctions of Park Road South with Solent Road and the Langstone roundabout, the 'Rusty Cutter' roundabout at Bedhampton, the Harts Farm Way 'teardrop' junction and the Warblington A27 junction are further examples of traffic bottlenecks which risk increasing paralysis from a constant

flow of planning applications that ignore cumulative predictive traffic load. In the case of the Warblington A27 junction, there is an additional cumulative impact from Chichester City Council housing developments east of Emsworth.

9.3 *How will the Local Plan engage with an HBC master plan for traffic management on the roads within the borough, enabling predictive traffic modelling for the borough's roads to ensure that delivery of essential transport infrastructure is a prerequisite to a planning approval, rather than an afterthought to development?*

HBC Regeneration as a co-requisite to the new Local Plan:

The HBC 'Regeneration Programme' needs a radical relaunch. The opportunities first floated in 2018 are now stale and the council's capital asset transactions at Brockhampton West, the Meridian Centre and the Bulbeck Road carpark have delivered no visible benefit to residents. The social and economic climate four years on is completely and radically different and the Regeneration Programme should be completely and radically reimagined to take this into account.

With the continuing decline in the retail offers provided by Portsmouth and Fareham, increasing numbers of external visitors are attracted to Havant town centre. Waterlooville also attracts visitors from Havant to the Wellington Retail Park. Efficient and cost effective public transport between the borough's main communities is, however, non-existent.

A subsidised, limited stop shuttle bus service between these two main sites via Park Parade and Dunsbury Park would provide significant benefit to the regeneration of Havant, Waterlooville and Leigh Park town centres and would help to optimise private car trips and parking across the borough. With appropriate timetabling, such a service could also provide effective east-west commuting between the employment sites and the residential areas within the Local Plan.

9.4 *Would Planning Services agree that a complete rethink of the Regeneration Programme is necessary in parallel with development of the new Local Plan in order to deliver earlier tangible benefits to the public across the wider borough?*

10 CPRE Hampshire - Caroline Dibden

10.1 *A question resulting from the Census results:*

In 2021, Havant had 56,340 dwellings and 53,600 households.

Over the period 2011-2021, Havant's households increased by 2,430, and new dwellings created were 3,559. So surely more than enough dwellings created compared to new households forming, a surplus of 1,129.

More importantly perhaps is what happened in Portsmouth: over the period 2011-2021, Portsmouth households increased by 944, whilst 3,139 new dwellings were created. So, Portsmouth had a surplus of 2,195. This indicates that Havant really shouldn't need to take any from Portsmouth.

Looking at this another way, and comparing 2021 "real" households from the Census to the 2014-projections, which are the ones used to calculate the housing numbers:

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- Havant's 2014-projection was an increase in households of 3,465, compared with actual increase of 2,430.
- Portsmouth's 2014-projection was an increase of 7,973, compared with the actual increase of 944. A whacking 7,029 fewer households shown to really exist compared with the projection!

I'd very much like to hear your thinking, and how PfSH are dealing with significantly lower household numbers than projected overall.

11 Bedhampton Heritage Alliance – Iain Fairley

11.1 What is your expected time line from going out to public consultation and adoption by Council for the new LP 2037?

11.2 Will the LP 2026 and the now rejected LP 2037 carry any weight between now and the new LP 2037 being adopted by Council?

11.3 What weight will be given to the 5 year housing figures?

11.4 Is there a policy for dealing with opportunistic planning applications that were not in LP 2026 and the old rejected LP 2037 if developers use the 5 year housing figures already set as a precedence by the upheld appeal to APP19/00427?

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