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From: Biltcliffe, Andrew
Sent: 02 December 2020 09:08
To: Havant Planning and Development Mailbox New
Subject: Consultation response - Planning Application APP/20/00990 and APP/20/00991
Havant Thicket, adjacent to Sir George Staunton Country Park, Middle Park Way,
Havant

Dear Planning

Consultation response from Havant Borough Council Regeneration Team on the following applications:

1. APP/20/00990 Havant Thicket, adjacent to Sir George Staunton Country Park, Middle Park Way, Havant – Hybrid application – Reservoir and Associated works
2. APP/20/00991 Havant Thicket, adjacent to Sir George Staunton Country Park, Middle Park Way, Havant – Outline application Pipeline and associated operations.

APP/20/00990 and APP/20/00991- This proposal represents the largest investment in Havant's infrastructure in many years and whilst it is primarily a commercial water supply venture the potential benefits on the sustainability of the wider area could be very significant.

The scale of the proposal on what is a greenfield site will have a significant impact on the environment of the area. The planning application and the wide range of accompanying documents all only appear to focus on environmental issues.

Whilst the statutory planning regulations require the submission of the Environment Statements, the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives) (para 8 NPPF). The submitted Planning Statement and the Design and Access Statement focus on the operational supply of water and the environmental objectives; there is no reference to the proposals' impact on social or economic objectives. The case being put forward in the application is therefore not considered to demonstrate the interdependency or balance the three objectives of sustainable development.

In considering this application it is essential that the proposal addresses whether it is sustainable development and in accordance with the NPPF, the Development Plan and the HBC Regeneration Strategy. This consultation response therefore aims to explore the economic and social perspectives to be considered alongside the substantial environmental considerations already being put forward.

The government has published the [National Infrastructure Strategy](#) on the 25 November 2020 which takes forward recommendations from the National Infrastructure Commission, particularly their focus on twin tracking (reduce demand and increase supply) set out in the report [Preparing for a drier future: England's water infrastructure needs](#). That identifies that Havant is in the most water stressed part of the country. In this context the supply of water from the South Downs aquifers to the Portsmouth Waterworks is a major resource that could be managed more effectively to increase year long water supply resilience through a winter storage reservoir. The government has also pledged that infrastructure investment is a major part of both our Covid recovery plan and a post Brexit Britain.

The NPPF is clear on the need for social and economic objectives to be considered alongside the 'traditional' environmental objectives of planning. Paragraphs 80 – 84 make clear the need for strategic infrastructure, such as reservoirs, to be provided in the right place to help create conditions for business investment, increase productivity and economic growth. Section 8 of the NPPF – Promoting healthy and safe communities is particularly relevant to Havant Thicket which adjoins Leigh Park parts of which are categorised in the National [Indices of Multiple Deprivation \(2019\)](#) as being in the most deprived areas in England, particularly in terms of education, health and crime. Such a major proposal adjoining these areas must demonstrate how it will secure net gains on these issues.

In terms of the Development Plan the reservoir proposal is allocated in the Core Strategy Policy CS18(2). Whilst dating from 2011 and so pre NPPF the policy remains up to date. The pipeline proposal APP/20/00991 is also allocated in principle in Policy AL6 of the Allocations Plan (2014). The emerging local Plan takes forward the Development Plan policy support for this key piece of infrastructure in Key Policy KP9. The Development Plan policies meet the NPPF requirement set out in Sections 7 and 8 by providing support for the water supply benefits, environmental impacts combined with potential community benefits.

The Regeneration Strategy is fully aligned with the Development Plan and is a key document for the Council. The Regeneration Strategy focuses on new homes in our town centres, attracting new jobs that align with upskilling our communities and promoting Havant as a fantastic place. The reservoir proposal has the potential to have a major impact on meeting the regeneration objectives. However, as submitted the application doesn't reference the Regeneration Strategy.

It is important to raise specific economic and social benefits that could accrue from this development which will positively regenerate the borough. This is particularly significant bearing in mind the proximity of Leigh Park to the proposal and the need for net social and economic benefits for that area. The onus ought to be on the applicant to be setting these out.

Nevertheless, the Regeneration Team consider that the economic and social benefits could include

- all development that is enabled by the ability to provide water supply where previously it would be a constraint,
- construction and ongoing maintenance jobs,
- reputational impacts of major project being in the news and putting Havant on the (investors) map,
- tourism (day visitors and longer-term visitors to the wider area),
- events opportunities,
- Indirect business support through more visitors in the area
- learning centre jobs and volunteers,
- establishment of new organisations supporting environmental interests
- Outdoor play areas, outdoor Gyms, trim trail all positively impacting on health and wellbeing. These are aspects of the proposal which appear to have been given limited thought yet have great potential for this area to engage the local community.
- Savings for the NHS from the community engaging with nature and culture
- Mental health benefits of engaging with the environmental aspects of the whole project and following through with ongoing interest
- Raising local individual and community interest which raises personal and educational aspiration
- Ability of PWC to continue/grow their Corporate Responsibility commitments.
- Benefits to the Itchen River socio-economic area from reduced abstractions
- Pipeline route – collaborate with partner organisations to improvements other utilities, leisure trail, surfacing and community engagement along the route construction

This is an initial list of potential social and economic benefits. Further work would be needed to give any quantification to these in terms of cost benefit, social impact assessment and softer benefits that might accrue such as increased happiness. These impacts need to be identified and evidenced by the applicant to demonstrate the significant social and economic net gains that are likely from this proposal and how they need to be balanced with the environmental net impacts.

It is possible that Portsmouth Water Company has already undertaken some socio-economic impacts assessments of the reservoir proposal as part of their business case to OFWAT to secure the agreement to move forward with the project. If such information is available then it ought to be submitted with the application. If it is not available then it is recommended that additional work is produced to demonstrate the social and economic impacts of the proposal in order that the sustainability of the proposal can be fully assessed.

Without a comprehensive sustainability impact assessment statement on how the social and economic objectives of the NPPF, the Local Plan and the Regeneration Strategy are being addressed by this major proposal the application is solely reliant on assessing environmental impacts. Whilst the environmental aspects are important, they are one part of the sustainability impacts this major infrastructure project could have on Havant and beyond both in the short term as part of Covid recovery and the longer term as part of the transformation and regeneration of the borough.

Regards

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Note: I normally work Monday , Tuesday and Wednesday

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