

Mr and Mrs PC Shephard
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Mrs D Haywood
Local Planning Consultation
Planning Services
Havant Borough Council
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17th August 2018

Dear Mrs Haywood,

APP/18/00672 – LAND OFF WESTWOOD CLOSE.

We wish to make you aware of a number of strong objections we have with regard to the proposed application to build 46 dwellings on the land (H10) off Westwood Close.

1. LOSS OF PRIVACY & OVERLOOKING – 16 WESTWOOD CLOSE.

Plots 03 (Ingram) and 14 (Windom) do not comply with rules laid down in the Havant Borough Design Guide, Chapter 5, Specific Guidance on Residential Development.

The bedroom window and ground floor patio doors of Plot 25 (Windom) are only 14 metres from our upstairs bedrooms, living room, kitchen and patio. The residents of this house will have a clear and unrestricted view into these areas of our property. **The Design Guide is clear, "The minimum back to back distance is to be 20 metres."**

The bedroom windows of Plot 03 (Ingram) are only 15 metres from our bedroom window and downstairs living room. The residents of this house will have a partial view into these areas of our property. **The minimum distance is 20 metres.**

2. OUTLOOK & DAYLIGHT – 16 WESTWOOD CLOSE.

Both properties (Plots 3 & 25) also fail the "45 degree rule" on outlook and daylight. **"This states that there is normally the potential to achieve adequate levels of daylight and outlook when no part of a building cuts through a line radiating at 45 degrees from the centre of a window that lights a habitable room."**

The enclosed map indicates the issues with both distances and outlook.

The HCC constraints mentioned under H10 include:

"Avoids unacceptable harm to the amenity of neighbouring residents along Westwood Close and Westbourne Avenue through loss of privacy, noise, outlook, and overlooking."

3. FLOODING

The field is a natural depression so is a natural rain soak away for the surrounding area (rear gardens of Westbourne Avenue, and Westwood Close) with a gradual filter of water into the River Ems. A development of 46 houses and roads will create a displacement of surface water which will be concentrated via SUDs to the River Ems, raising river levels, and creating the possibility of flooding downstream. The current water table is only 40cm below the surface so it is difficult to understand how the proposed SUDs which relies on holding rainwater beneath the roads will actually work. Surely the SUDs will be saturated with ground water all year round and will have little effect during periods of heavy rain.

The Environment Agency and the Emsworth Flood Risk Strategy are clear in their present and future flood concerns:

"The Environment Agency's flood zones are for present day use and do not take into account the effects of climate change. The EA recommend that an increase of between 45% and 105% in river flow is applied over the 100 year life of a residential scheme. This will dramatically increase the size of flood zone 3."

"Emsworth Flood Risk Strategy Oct 2017 Para 3.07: Clearly, Emsworth is currently affected by high incidents of flooding. However, it is likely that this situation will worsen in coming years, as a result of climate change and the possibility of more extreme weather events. Therefore, it is appropriate make the most of opportunities to contribute to the reduction of flood risk in the future through the Local Plan (Allocations) where possible."

4. PREMATURE DEVELOPMENT

This site was found not suitable in 2013, as site UE27. At that time HBC reported that the site had:

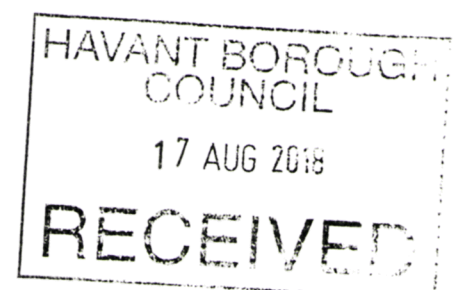
"Potential flood issues at site and size, shape and stream corridor issues would limit the development opportunity".

Nothing has changed, the reasons that the Council found it undeliverable in 2013 are as valid today as then.

According the Council's Draft Plan 2036 they have an OAN (Objectively Assessed Need) of 9260 homes by 2036. (p158, table 6) They have a total of 9549 homes either completed, committed, and to be made through further supply, an excess of 289. While this excess figure is described as a buffer, we believe that a development of 46 homes off Westwood Close is patently not required to help HBC fulfil their housing figures.

Havant Draft Plan 2036 – "There are sufficient sites to accommodate the need for housing together with a reasonable buffer. This would not change if this site is not allocated."

If in a worst case scenario a further 46 houses were required, they could with a minor (1.8%) increase in density be accommodated on the Southleigh Road site.



5. ACCESS TO SITE, SAFETY, SITE TRAFFIC & NARROW ENTRANCE

Westwood Close is a very narrow road, with bin lorries and road sweepers finding access and manoeuvrability difficult as it is. This will only be increased with this proposed development, with up to 116 more resident's cars parked on the road, in the new site and on the existing road. This will also make it difficult for emergency vehicles to access the site.

The Havant 2036 draft Plan states in part 4 under Infrastructure, that regarding Transport and Parking in New Developments:

"Adequate provision is made for varying sizes of vehicles, including refuse and emergency vehicles, to access all parts of the site, park, load, unload and turn safely and conveniently"

6. OPEN GREEN SPACE RECREATIONAL AREA

The field is a natural green corridor separating West Sussex from Hampshire. The footpath is an historic one, and was once the main path between Emsworth and Westbourne. It remains in constant use, with over 150 people using it and the wider field every day. If the footpath, which is part of the Sussex Border Path is realigned closer to the river Ems as proposed by the developer it will then be in a Flood Zone 2-3 area with a higher water table and more liable to flooding.

Such a realignment of this footpath is also contrary to the policy of HBC, that under their proposal of the site in the Draft Plan, the constraints mentioned under H10, on the design and layout, mentioned:

"Provides a suitable alternative route for the existing public footpath either through or around the development site".

Also, the NPPF has a paragraph relating to this:

"75. Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails".

Also, the Havant Draft Local Plan, under Local Plan Policy E1, refers to –

"5.10 Active travel (walking and cycling) should be prioritised over other modes of transport as it provides the greatest opportunity for people to be physically active in their day to day lives.

"5.14 Health and wellbeing is not a standalone policy, it is influenced by a number of themes, including transport, open space, housing, employment and environmental quality. Therefore this policy should be read alongside all the other policies in this plan".

Elsewhere the Draft Havant Borough Local Plan 2036 | January 2018

"Green infrastructure is essential in creating quality of place, underpins community health and wellbeing, and provides habitats for wildlife".

This site fully complies with criteria required to become a designated green space. This would ensure that this well used community space is fully protected for the enjoyment of all the residents of Emsworth and Westbourne.

7. WILDLIFE.

This area has many different species of birds, reptiles and mammals including four species of bat, two of which are endangered.

The River Ems is not only an important habitat for Salmon Parr but also for the Water Vole which has recently gained the unenviable title of the UK's most endangered mammal. The Voles have been seen at Brook Meadow and within 300m of the site at the Westbourne cut. It is therefore not unreasonable to assume they are also living on the river between these points. This proposed development is within 120 metres of the river Ems. Do we really wish to further contribute to the further demise of this well loved species?

8. DRAFT LOCAL PLAN 2036.

The consultation on the draft plan received 154 replies. These were all against any form of development on this site. We fully support these comments and the council's pledge to review the principle of including this site. The EA's pending flood review of the site should be fully considered prior to any planning decision taking place.

9. CONCLUSION

For the reasons given above, we hold that this planning proposal for 46 homes on this site is totally unnecessary. HBC have clearly stated that the site is not required in order to meet the council's housing target and that the principle of including this needs to be given further consideration. We strongly recommend that HBC reject this planning application, accept the wishes of the people of Emsworth and classify the site as a Local Green Space.

Yours sincerely



PC SHEPHARD



PM SHEPHARD

16 Westwood Close

1. The distance between the rear windows (back to back) is approximately 14 metres and the distance between the front windows is 15 metres. The minimum back to back distance in accordance with the Design Guide Chapter 5 is 20 metres.
2. Plots 2B and 4B do not comply with the 45 degree rule.



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