

PLANNING APPLICATION FOR RESIDENTIAL DEVELOPMENT AND ASSOCIATED LANDSCAPING, ACCESS AND SUPPORTING INFRASTRUCTURE

SUPPLEMENTARY PLANNING STATEMENT

LAND NORTH OF LONG COPSE LANE, EMSWORTH

ON BEHALF OF LAND AND PARTNERS

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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1.0 INTRODUCTION

- 1.1 This Supplementary Planning Statement should be read in context of the submitted Planning Statement dated August 2021.
- 1.2 The purpose of this Statement is to respond to the consultation responses received for the submitted planning application, present the new amendments to the scheme and demonstrate compliance with the relevant planning policies.
- 1.3 The Statement concludes that the amended application aligns with the latest planning policy position and will make a significant contribution to Havant Borough Council's housing land supply. It will deliver local infrastructure and bring about environmental improvements of both local and strategic significance.

2.0 CONSULTATION RESPONSES

2.1 The following responses have been received to date from statutory and other key consultees:

HAVANT BOROUGH COUNCIL

08 Sep 2021 BUILDING CONTROL TEAM
21 Sep 2021 HOUSING TEAM
23 Sep 2021 ECONOMIC DEVELOPMENT TEAM
23 Sep 2021 COMMUNITY INFRASTRUCTURE TEAM
27 Sep 2021 TRAFFIC TEAM
28 Sep 2021 LANDSCAPE TEAM
12 Oct 2021 PLANNING POLICY TEAM
26 Oct 2021 NUTRIENTS TEAM
09 Nov 2021 ENVIRONMENTAL HEALTH POLLUTION TEAM

HAMPSHIRE COUNTY COUNCIL

15 Sep 2021 MINERALS & WASTE
23 Sep 2021 LOCAL LEAD FLOOD AUTHORITY
23 Sep 2021 ARCHAEOLOGY
28 Oct 2021 ECOLOGY
22 Nov 2021 HIGHWAYS

ADJOINING AUTHORITIES

11 Oct 2021 WESTBOURNE PARISH COUNCIL
15 Oct 2021 WEST SUSSEX COUNTY COUNCIL
28 Oct 2021 CHICHESTER DISTRICT COUNCIL
15 Nov 2021 SOUTH DOWNS NATIONAL PARK

OTHER EXTERNAL

15 Sep 2021 SOUTH EAST HAMPSHIRE CLINICAL COMMISSIONING GROUP

15 Sep 2021 FORESTRY COMMISSION
23 Sep 2021 HAMPSHIRE CONSTABULARY CRIME PREVENTION OFFICER
27 Sep 2021 ENVIRONMENT AGENCY
30 Sep 2021 PUBLIC HEALTH HAMPSHIRE
30 Sep 2021 SOUTHERN WATER
07 Oct 2021 PORTSMOUTH WATER
06 Dec 2021 NATURAL ENGLAND
10 Jan 2022 PORTSMOUTH WATER

- 2.2 The new pack of information set out in Section 4 of this Statement has taken full account of these comments. For several consultees there has been direct engagement to ensure the new information meets their precise requirements.
- 2.3 In addition, comments from members of the public have been carefully considered and the new pack of information amended to correct, clarify and explain any issues.
- 2.4 In relation to the trees in Long Copse Lane, public comments have helped to update the Arboricultural Report to correctly show the impact on trees within Long Copse Lane and demonstrate that all the mature/veteran oaks can be retained so as to retain the essential character of the Lane.
- 2.5 Similarly, in the updated Highways information it is clarified in response to public comments that no tree removal is proposed for Redlands Lane. This extra information also addresses road safety and traffic impact issues raised by objectors.
- 2.6 Many of the objections concern matters of principle that have already been resolved by the Council's inclusion of the site as a housing allocation within the Submission Havant Borough Local Plan (HBLP) and the subsequent examination of the proposed allocation by independent inspectors.

Waste Water Treatment Capacity

- 2.7 Southern Water have responded to this planning application by confirming that there is mains sewerage capacity and they will accept the connection. The nearest point of geometric compatibility is a 150mm sewer in Long Copse Lane. New development contributes to funding necessary infrastructure works via the per plot statutory infrastructure charge.
- 2.8 Southern Water responded to a capacity check enquiry for the proposed Long Copse Lane development in May 2021, confirming that there is currently adequate capacity in the local sewerage network to accommodate foul flows from the development. This correspondence is included in Appendix D of the Utility Statement submitted with this application.
- 2.9 Private wastewater on-site treatment is also an option if a mains connection is not practically feasible or there would be significant benefit to the environment. Such infrastructure would be adopted and maintained by ST Connect (An OFWAT regulated statutory wastewater company). This method would also deal with nitrogen neutrality at source but the applicants preference remains for a connection to the mains sewage network and the nitrogen neutrality delivered through the Stansted Park package.
- 2.10 As set out in the submitted drainage strategy, the proposed mains connection would drain to Southern Water's Thornham Wastewater Treatment Works (WwTW). The development of the wider allocation for about 260 dwellings has been taken fully into account in the preparation of the new HBLP. The May 2021 Habitats Regulation Assessment (CD13a) for the Plan sets out how waste water infrastructure has been considered, having regard to the Integrated Water Management Strategy prepared by the Partnership for South Hampshire. Neither Southern Water, the Environment Agency nor Chichester District Council objected to the amount of development proposed in the Submission HBLP and the expected drainage into the Thornham catchment. Nor did the Inspectors identify wastewater treatment as a main matter. The H8 allocation for around 260 dwellings was endorsed in the interim findings and there are no soundness issues in terms of wastewater.

2.11 Southern Water have a duty to respond to the planned growth in Local Plans. Their investment plans operate on a long term basis through five year Asset Management Plans which are Regulated by OFWAT. They are in the process of developing Drainage and Wastewater Management Plans, which will identify the most appropriate way to upgrade their infrastructure in each catchment, where this is needed. In terms of occupancy of this site there is ample time to implement measures. The August 2018 Chichester District Council Water Quality Assessment specifically addresses WwTW Capacity and sets out the options:

"4.2.22 Where it is not feasible to increase the capacity of the works alternative measures should be considered such as redirecting flow away from a WwTW to one with available capacity.

4.2.23 An additional range of measures are generally considered by Southern Water. These include:

- Accommodation at existing catchment WwTW, with minor investment (new permit conditions achievable with existing plant/process);*
- Accommodating at existing catchment, with capital expenditure (provide more treatment capacity);*
- Transferring flows from development to adjacent catchment where headroom exists or investment requirements are lower than at catchment WwTW;*
- Transferring flows from development and closure of catchment WwTW with transfer of flows, where costs stack up and acceptable to the environment;*
- New WwTW to serve large development locations (typically last resort);*
- Create capacity by removal of surface water from catchment."*

2.12 It is up to Southern Water how they implement works to accommodate growth in terms of the works undertaken and the timing of these. Both Budds Farm catchment to the west and Thornham to the east require improvements (with Budds Farm currently a higher level of concern than Thornham).

2.13 Havant Borough Council's position on how the HBLP takes account of wastewater is summarised in their statement in relation to Matter 4 (MIQ05) in the examination library. Response 4.8 states the following in relation to Thornham WwTW:

"How would this policy operate in the event that Thornham Water Treatment Works reaches capacity during the plan period? What effect would this have on the delivery of proposed housing allocations?"

24. We understand capacity to mean the ability of Wastewater Treatment Works (WwTW) to operate within their statutory licenses and accept new connections. In the event that Thornham Wastewater Treatment Works (WwTW) reaches capacity, there are several options available to Southern Water. This includes redirecting wastewater to a WwTW with capacity, freeing up Thornham to accept new connections. The Local Plan Habitat Regulations Assessment (CD13a) on paragraph 7.61 explains Southern Water's role and the possible options they could use to address any capacity issues.

25. This matter was specifically addressed in the Chichester District Council Water Quality Assessment, which also took into account development in the Havant Borough Local Plan in Emsworth, which will drain to Thornham. Section 4 of the study from paragraph 4.2.20 onwards states the mitigation options available should the WwTW reach capacity. The Havant Borough Local Plan (CD01) includes a requirement for the optional water efficiency standard in Policy E12 which will also reduce the pressure on WwTW capacity. These measures ensure that there would be no impact on housing delivery."

2.14 As part of the preparation of a new Chichester Local Plan, a Position Statement on managing new housing development in the Thornham WwTW catchment has recently been signed by Southern Water, the Environment Agency and

Chichester City Council. Havant Borough Council does not use the same water efficiency figures as Chichester City Council and are not signatories to the Statement.

2.15 In summary:

- Developers are responsible for their on-site sewers, connection cost to the nearest point of geometric compatibility and for payment of the infrastructure charges subsequent to grant of planning permission. The developer is not responsible for the detail or timing of upgrade works downstream of the point of geometric compatibility.
- Havant Borough Council has tested its proposed level of growth through the new Local Plan process with the cooperation of Southern Water, the Environment Agency and surrounding authorities such as Chichester District. No objections were sustained from these key stakeholders on the amount and timing of housing growth nor the approach to wastewater. The dwellings proposed in this application is an integral part of the spatial strategy of the Submission HBLP.
- Southern Water has access to accurate, continuous and timely supply of Local Plan growth requirements from Local Planning Authorities. They also receive the infrastructure payments from developers and will determine what approach they will take and will ensure that infrastructure is upgraded where necessary to ensure the timely delivery of the Local Plans with sufficient headroom. There are a range of options available to address the capacity of WwTWs ahead of major upgrades to the works: water efficiency measures; capacity improvements (storage and/or treatment); transfer of flows to alternative treatment locations; removing surface water and/or groundwater inflows to sewers.
- Southern Water has confirmed there is capacity for this scheme and will accept a connection. There is also headroom on the current figures. In the event of a headroom shortfall then we would expect a range of interim measures to be agreed. And as a last resort, if Southern Water could

demonstrate no interim solutions at all for schemes then site developers would have to adopt a waste water treatment plant on-site. In any event, housing delivery would not be affected.

3.0 PLANNING POLICY UPDATE

The Emerging Plan

- 3.1 Paragraph 48 of the National Planning Policy Framework (NPPF) advises that the weight given to relevant policies in emerging plans is dependent on: the stage of preparation of the emerging plan; the extent of unresolved objection to individual policies; and the degree of consistency with the NPPF.
- 3.2 Only limited weight can be given to the Submitted HBLP, given that the Plan has recently been withdrawn. This proposal does not rely on the emerging plan for justification; it already amounts to sustainable development that national policy indicates should be approved without delay.
- 3.3 Since the submission of this planning application, the Council published the Inspector's Interim Findings Report for the Submission HBLP in November 2021. The Interim Findings Report does not set out all the Inspectors' findings on all of the issues discussed during the Stage 1 hearings. Instead, the report focuses on the areas where they have soundness and/or legal compliance concerns. Policy H8 was an individual policy covered thoroughly during the Stage 1 hearings and no issues of concern in relation to this policy are reported in the Interim Findings Report.
- 3.4 In contrast to other proposed housing sites where issues of concern were raised affecting their ability to deliver as expected, Policy H8 is an independently examined allocation, consistent with the NPPF.
- 3.5 The site was first considered through the 2016 SHLAA process and found to be suitable for housing, before being identified for early release in the Local Housing Statement and then included in the Submission HBLP. As such, the Council has long considered that the site has no constraints that cannot be mitigated, it is available for development, and sustainable development can be achieved on the site. These conclusions were endorsed by the Inspectors following examination of the Submission HBLP, during which officers directly

addressed the objectors in front of the Inspector.

3.6 With regard to Policy CR18, the Inspectors' were unable to find the level of development proposed on Hayling Island sound. Consequently, the Inspectors could not consider the HBLP's Spatial Strategy to be justified.

3.7 In addition to the Spatial Strategy, the Inspectors' provided comments in respect of a number of proposed allocations within the HBLP, a summary of which is provided below.

- Policy KP1 – The Inspectors' raised concerns over the ability of the Council to deliver the full quantum of housing, particularly that in Phase 2. It was considered that a shortfall of some 300 dwellings exists and that this quantum should be removed for the Council's anticipated housing supply.
- Policy KP2 – Concerns have been raised over the level of detailed due diligence undertaken to determine how the full quantum of 600 homes could be delivered. On this basis, the Inspectors' requested that 335 dwellings are removed from the Council's anticipated supply.
- Policy KP3 – The Inspectors' have queried the proposed approach to flood risk and evacuation. Based on current evidence, the Inspectors' conclude that 155 homes should be removed from the Council's anticipated supply.
- Policy KP5 – Concerns have been raised regarding impacts on delivery caused by the current lack of developer and implementation of necessary road and rail infrastructure. It is considered that delivery will be slower and that 400 dwellings should be removed from the Council's anticipated supply.
- Policy H27 – There is an outstanding objection from Natural England due to the site's importance to Brent Geese. In the absence of replacement mitigation, the site is considered by the Inspector's not to be currently 'deliverable' or 'developable' as per NPPF definitions and on this basis 390

dwellings should be removed from the Council's anticipated supply.

- Policy H40 – similar concerns to Policy H27, relating to outstanding objections from Natural England in relation to Solent Waders and Brent Geese remain and the site is not considered 'deliverable' or 'developable'. On this basis, the Inspector's consider that 650 dwellings should be removed from the Council's anticipated housing supply. Separately, an extant Historic England objection remains in respect of the impact on three scheduled monuments close to the site. Whilst a setting study is to be produced, Inspectors' consider that the assumed contribution of 650 dwellings is overly optimistic.

3.8 Although the draft Plan has now been withdrawn, the Interim Findings Report, together with the evidence base for the Plan and the subsequent findings remain a matter of public record. It is a material consideration which reinforces the principle of development.

3.9 The Planning Policy Committee on 22 February 2022 recommends to the full Council on 16 March the withdrawal of the HBLP from Examination, and a Housing Delivery Position Statement (HDPS) be adopted, which clearly sets out the relevant material considerations for decision-making on planning applications for new housing. The purpose of the HDPS is to provide certainty as to how planning applications for housing proposals will be considered until such time a Local Plan has successfully passed through Examination. In particular, the HDPS sets out what the Council considers to be sustainable development in assessing proposals on sites which are not in the adopted or emerging Local Plans. This is necessary because a replacement Plan will take considerable time to prepare and will involve new or updated evidence base studies in relation to the deliverability of a number of proposed housing sites in the Submission Plan.

3.10 At the Havant Borough Planning Policy Committee Meeting of 22 February it was unanimously agreed to approve the recommendations to Full Council without any amendments to the HDPS.

3.11 Paragraph 5.27 of the Committee Paper states:

"In the short term, it is essential that the Borough is able to determine planning applications and that this is done in a clear way. This is necessary both in terms of maintaining its current position, and where possible improving the supply deliverable housing sites".

3.12 The HDPS states that the Council will continue to support the principle of development on sites that were proposed as allocations in the Submission HBLP. The H8 allocation is carried forward into the HDPS as EM7 under Decision Making Principle 2 – Sites not in accordance with the Development Plan where the Council accepts the principle of development. The proposal also has to meet Decision Making Principle 1 (Application of the Tilted Balance and the Habitat Regulations) and Decision Making Principle 5 (Development Quality). Additional Decision Making Principles apply to Hayling Island/Langstone and Southleigh Strategic Site that don't apply to EM7.

3.13 Section 5 of this document ('Assessment of Revised Scheme against new Decision Making Principles') sets out how the scheme meets every aspect of Decision Making Principles 1, 2 and 5.

Housing Delivery Test

3.14 Since the submission of the application, the 2021 Housing Delivery Test results for Havant were received in January 2022. The previous year's results were 72% and the latest results show 74%, a shortfall of 331 dwellings in the period 2018-2021. Therefore the situation remains significantly below the expectation in the NPPF. As it remains below 75% it means the NPPF's presumption in favour of sustainable development will continue to apply, irrespective of the housing land supply situation.

Housing Land Supply

3.15 The NPPF indicates that where the local planning authority cannot demonstrate

a five-year supply of deliverable housing sites the policies in the development plan are to be considered out of date. In such cases the 'tilted balance' is engaged under paragraph 11(d) of the NPPF, and the local planning authority as the decision maker must carry out a 'balancing exercise' in which planning permission should only be withheld where the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits of the scheme. Therefore, national policy considerations should be afforded substantial weight in the planning balance against the conflict with the development plan.

- 3.16 A deterioration in land supply reinforces the need to boost it with planning permissions. As the Government's objective is to significantly boost the supply of homes (paragraph 60 of the NPPF), where there is a significant shortfall in supply it increases the weight that can be given to the housing delivery benefits of a scheme.
- 3.17 The Council's Five Year Housing Land Supply Update (September 2021) indicates the Council has just 4.3 years supply with a 20% buffer applied. It represents a deterioration in the land supply from the June 2021 Housing Land Supply Update at the time of the planning application, which demonstrated 4.4 years supply. In the latest update the Council expects policy H8 to deliver 120 dwellings within the five years period; so it is becoming an increasingly important component of the supply of sites the Council is relying on.
- 3.18 As a result of the Inspectors' Interim Findings Report the Borough's five-year supply has worsened still further. The committee paper for the Planning Policy Committee on 22 February notes the following:
- As a result of the removal of some sites from supply from the Inspector's interim report, this position has fallen to 3.9 years supply, which is a 'significant' reduction in the Council's anticipated land supply and 'substantially' below the five year housing land supply threshold.
 - The result of the Interim Findings Report and the Borough's Five Year Housing Land Supply will be an increase in development pressure.

- The need for housing does not diminish by the withdrawal of the plan – there is a clear need to significantly boost the supply of housing in line with the NPPF and the tilted balance should be afforded substantial weight in the planning balance.
- The example of the Lower Road appeal is that the urban area boundaries in the adopted Local Plan were afforded 'very limited' weight in the planning balance whilst the substantial deficit in the Five Year Housing Land Supply was afforded 'substantial weight'.

- 3.19 Since the submission of the Planning Application, the Council has been willing to approve several unallocated sites on their merits, as a departure from the adopted Local Plan. Most of these were proposed allocations in the Submission HBLP but it included an 'omission site', Land west of Hulbert Road (APP/20/00441), which received a resolution to grant for 100 dwellings at the 11 November 2021 Planning Committee. It was acknowledged that there were access issues on site and that the traffic likely to be generated by this development would exacerbate the existing problems associated with the Hulbert Road to the detriment of the other users of this highway; and on the impact of noise from the major roads adjoining this development. Against this, the mitigation measures proposed were considered to allay the technical concerns presented and the item was approved.
- 3.20 Whilst the Land west of Hulbert Road scheme will reduce the shortfall by approximately 0.15 years, it is nowhere near enough to close the delivery shortfall and the Borough has very limited options for finding new sites. The Stage 1 Examination hearings heard that the Council had effectively exhausted the supply of suitable sites across the Borough.
- 3.21 There has been some limited progress in making more efficient use of existing allocations. An application for Forty Acres Farm at Havant was approved on 11th November 2021, increasing the approved scheme by 34 units to create a total of 147 dwellings. There appears to be very little scope for further increases in site capacity across the Borough, with the proposed allocations based on a comprehensive analysis of site opportunities and constraints.

3.22 There are two 'live' speculative applications that may be able to contribute to land supply:

- 65 dwellings on land south of The Mallards and west of Langstone Road, Havant (Southmere Field) ref: APP/21/00647
- 43 dwellings on land south of Lower Road and west of Old Manor Farm, Havant ref: APP/21/01071

3.23 Even if these were able to demonstrate their acceptability, they would not significantly change the land supply situation.

Housing Delivery Action Plan (HDAP)

3.24 The publication of a new Housing Delivery Action Plan (HDAP) is expected to be approved by Council on 16 March. An annual Housing Delivery Action Plan is required to be published where the Housing Delivery Test indicates that delivery has fallen below 95% of the Council's housing requirement over the previous three years. It identifies the reasons for housing under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery.

3.25 At the Havant Borough Planning Policy Committee Meeting of 22 February it was unanimously agreed to approve the recommendations to Full Council without any amendments to the HDAP.

3.26 A key action identified by the HDAP is for the Council to support the principle of residential development on emerging allocations in advance of a new Local Plan being adopted.

3.27 Table 4 of the HDAP considered by the Planning Policy Committee lists the live major housing applications. This application at Land north of Long Copse Lane, Emsworth has the following key issues identified:

"Application valid and consultations underway. Large number of objections received".

- 3.28 No technical issues are identified for the application site in Table 4. For other live applications in the table it is also noted that large number of objections have been received. Furthermore, many of the other applications within the Submission HBLP allocations have technical problems listed as a key issue, which in some cases has resulted in many years of delay. Paragraphs 3.26 and 4.13 of the HDAP confirms that a great deal of the remaining available sites are affected by complex technical constraints and progress on their determination has been slow as the evidence has not been provided showing how those constraints can be overcome.

Emsworth Neighbourhood Plan

- 3.29 The Emsworth Neighbourhood Plan (ENP) was 'made' by the Borough Council on 22 September 2021 and forms part of the development plan for Havant Borough.
- 3.30 The ENP has been informed by the strategic policies in the adopted Havant Local Plan, made up of the Core Strategy (2011) and the Allocations Plan (2014) against which it has been found to be in general conformity. In introductory text it is noted that *"In order to address the high need for new housing in the borough, Havant Borough Council is reviewing the adopted Havant Local Plan. Therefore, this neighbourhood plan has regard for the emerging Havant Borough Council Local Plan"* (of which the application site formed part under Policy H8).
- 3.31 Notably, the ENP identifies at page 10 and 11 that continued dialogue between the Neighbourhood Forum and the Council took place throughout the plan-making process, this including the earlier Local Plan Housing Statement and throughout the draft stages of the Local Plan in 2018 and 2019 to identify sites for development across the borough, including Emsworth, as well as general policies guiding future proposals. In addition, dialogue was progressed to ensure that the Borough Council was aware of the community's aspirations for

the future of Emsworth, and that the Neighbourhood Plan remained in general conformity with the emerging Local Plan, this being continued through the HDPS.

4.0 NEW INFORMATION PACK

4.1 In response to the consultation responses new information has been submitted for re-consultation as follows:

Shadow Habitat Regulations Assessment (HRA) prepared by Pegasus Group and Davidson-Watts Ecology

4.2 This has been produced to consider the effects of the proposal on statutory International / European designated sites in the vicinity of the Site. These comprise:

- Singleton & Cocking Tunnels Special Area of Conservation (SAC).
- Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar site
- Solent Maritime SAC
- Kingley Vale SAC
- Solent & Isle of Wight Lagoons SAC

4.3 Under the Habitats Regulations 2017, the Competent Authority (Havant Borough Council) may only agree to a project or plan which is likely to have a significant effect on these sites after having ascertained that it will not adversely affect their integrity alone or in combination with other plans and projects.

4.4 Using a precautionary approach, the Shadow HRA concludes that there will be no adverse significant effects on the integrity of any of the qualifying interest features within any of the identified sites either alone or in combination with other development projects. As such, the Council now has sufficient

information to conclude that the proposal will not result in significant adverse effects on the integrity of the designated sites identified.

- 4.5 This conclusion is based on the incorporation of mitigation measures that relate to the following effect pathways, having regard to existing submitted documents and the new submitted for re-consultation.

Pollution to groundwater and water resources

- 4.6 The previously submitted WSP Drainage Strategy, informed by the preliminary land contamination assessment, already sets out how on-site SuDS design can prevent water pollution. A Construction Environmental Management Plan (CEMP) has now been submitted to address the construction phase. Mitigation for both these elements can be secured by condition. Pollution from nutrients into the Solent is addressed by the revised Nutrient Balancing Assessment which will rely on conversion of cereal crop to woodland planting in perpetuity so as to off-set nutrients generated from the site. A draft S106 (Stansted Estate Mitigation Plan) demonstrates how the implementation, management and monitoring of the nutrient mitigation will be secured.

Recreational pressure

- 4.7 It has already been agreed that a financial contribution to the Solent Recreational Mitigation Strategy is to be secured by S106 Agreement and provision of on-site Public Open Space will be secured by condition.

Ecosystem modification (loss and/or degradation of supporting habitats)

- 4.8 The provision of proposed landscape buffers within the site have been increased on the revised illustrative masterplan following the preparation of the new Lighting Strategy Technical Note to supplement the previously submitted Lighting Strategy. As well as conditions to control landscape generally across the site it is proposed that the Zone A management areas (i.e. the strategic buffers) in the Biodiversity Enhancement Plan (BEMP) are fixed in

the S106 Agreement. As well as this on-site habitat creation, the draft S106 now provides more detail on how the off-site habitat creation at Stansted Estate will be delivered. This will be of direct benefit to the locally breeding Bechstein's Bat population but will potentially also be of indirect benefit to the Singleton and Cocking Tunnels SAC, which although nearly 14km away (beyond the normal impact zone) are functionally linked at the population level to the Stansted Estate.

**Revised Illustrative Masterplan (Appendix 2 of the Shadow HRA)
prepared by Carlton Design Partnership**

- 4.9 Rev S of the Illustrative Masterplan has been prepared to align with the new WSP Lighting Technical Note and iTransport Highways Addendum.
- 4.10 The strategic landscape buffers proposed for the eastern and northern boundaries have been increased to show a minimum of 32 metres width.
- 4.11 Additional barrier planting is shown along the northern perimeter of the housing layout to ensure no trespass into the ancient woodland.
- 4.12 The east-west route running inside the site is now shown as a 3m wide cycleway.
- 4.13 A new point of pedestrian and cycle access is shown at the south-eastern corner of the site direct onto Long Copse Lane, utilising an existing field access.

**Stansted Estate Mitigation Plan (Appendix 3 of the Shadow HRA)
prepared by Gowling WLG**

- 4.14 As well as the diagrams and sketches submitted with the application for the off-site mitigation land at the Stansted Park Estate, a draft S106 Agreement is now provided which sets out more detail on the implementation, management and monitoring. It is based on other precedent agreements that have been agreed and completed covering similar issues in the area. As well as ensuring

the cessation of agriculture in perpetuity, the S106 Agreement will control the number and species of trees, the timing of planting and measures for maintaining the successful growth of the trees for a minimum of ten years after planting.

- 4.15 Around 8 hectares are available for this project, to secure not only the nitrogen neutrality for the new homes but also to provide a strategic flight corridor between Stansted and Southleigh Forests parcels in an area where there is known rare bat colonies. This is considered a major environmental gain and is supported and welcomed in particular by Natural England and the County Ecologist.

Revised Nutrient Balancing Assessment (Appendix 4 of the Shadow HRA) prepared by Tetra Tech

- 4.16 The revised assessment uses Version 5 of Natural England's Advice on Achieving Nutrient Neutrality for New Development in the Solent Region. It also includes a new Appendix E containing a land use summary with supporting evidence for both the application site and the off-site mitigation land.
- 4.17 The revised Nutrient Balancing Assessment follows the suggestion of Natural England in their consultation response for the off-site mitigation land at Stansted Park to provide all the required nutrient mitigation to balance the nutrient load of the development. This avoids the need to submit a detailed design for any on-site wetland. The proposed on-site SuDS features in the landscape will naturally provide nutrient removal over and above the off-site provision, but the development does not rely on it. Accordingly, the conclusions are more robust as a result.
- 4.18 The off-site mitigation at Stansted Park is closely modelled on the Warblington Farm scheme, involving the permanent removal of intense agricultural use from land and instead provides biodiversity gain and tree planting to those areas.

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- 4.19 The revised Nutrient Balancing Assessment also provides a more detailed explanation of how the proposed mitigation land will be able to mitigate the nutrient load of the proposed development, and the revised report has been prepared in consultation with HBC and Natural England. The sources of nitrogen and proposed mitigation are within the same catchment and there is a clear link between effect and proposed mitigation.

Biodiversity Enhancement and Mitigation Plan (Appendix 5 of the Shadow HRA) prepared by Davidson-Watt Ecology

- 4.20 The BEMP covers both the site itself and the off-site mitigation land at Stansted Park to be secured by the S106 Agreement. It divides the land into broad management zones to enable specific management measures to be tailored for each zone.
- 4.21 As a result of the extensive evidence gathering and site specific survey work, over several years, it is known that Bechstein's bats use the northern and eastern boundaries of the site as commuting and foraging habitat rather than crossing the site. The buffer zones adjacent to these areas have been designed primarily to provide dark vegetated flight corridors for Bechstein's bats to ensure their existing commuting and foraging habitat are not indirectly affected. The buffer zones are minimum 30m width and there will be management/control of artificial light levels to less than 1 lux at the development side of the buffer, reducing to 0.2 lux in the bat habitat corridors, which will ensure that there are no significant adverse effects on the bat corridors for community and foraging.
- 4.22 Detailed cross-sections to demonstrate how the landscape buffer will work on the northern and eastern boundaries are provided at Appendix 1 to this document.
- 4.23 The BEMP dovetails with the wider Transport Strategy that allows for a circular walking route around the perimeter of the developable area within the site and with connections via Long Copse Lane. This provides a clear and legible route along the development edge of the landscape buffers which will keep people

away from the dark interior. Impenetrable scrub will be planted along the outer edge of the landscape buffers to prevent trespass into ancient woodland to the north.

- 4.24 The creation of bat specific mitigation off-site in the form of broadleaved woodland habitat will provide habitat for Bechstein's bat connectivity between Stansted and Southleigh Forests, thereby linking two major forest areas supporting ecological connectivity for Bechstein's bats and other bat species.

**Lighting Strategy Technical Note (Appendix 6 of the Shadow HRA)
prepared by WSP**

- 4.25 This supplements the submitted Lighting Strategy and aligns with the BEMP. It demonstrates how light spill will be prevented in the unlit bat buffers along the north and east of the site, using the following design criteria:

- Minimum of 30 metres from site boundary below 1 lux
- Minimum of 20 metres from site boundary below 0.2 lux (i.e. 'dark')

- 4.26 This level of darkness is achieved without the modelling of external baffles for the lighting columns or tree planting in the buffers. The lighting columns will be at least 32m from the northern and eastern site boundaries

- 4.27 Where cycle/footways within the scheme are removed from the access roads and drives (such as at the south west and south east corners of the development connecting to Long Copse Lane), there will be "wayfinding" lighting proposed using LED solar studs set in at ground level which will illuminate the width and extent of the routes. One such design as shown below which includes a "bat hat" and this reduces upward light to 2% which is at a level that does not disturb/disrupt light sensitive bat species.

- 4.28 This product is an in-ground solar stud which can be used as an alternative wayfinding product. This does not offer a level of illumination across the surface

but is installed to provide a guide. The inclusion of a 'bat hat' reduces upward light to 2%, which is at a level that does not disturb/disrupt light sensitive bat species.

- 4.29 The application site sits outside any recognised "Dark Skies" zone relating to the South Downs National Park but even so, the revised Lighting Strategy complies with the guidance and requirements of the South Downs National Park Authority. Accordingly, the proposal is particularly robust on this issue. The revised Lighting Strategy also confirms the proposal accords with E1 lighting requirements, as requested by the South Downs National Park Authority.

Construction Environmental Management Plan (Appendix 7 of the Shadow HRA) prepared by Land & Partners

- 4.30 The CEMP sets out details of measures to avoid harm to the natural environment during the construction phase. It outlines the management protocols which will be adhered to in order to protect the habitats and species in and around the site. A further CEMP can be conditioned to cover the additional details available at Reserved Matters stage.

Transport Addendum: Additional Transport Information prepared by i-Transport

- 4.31 This addresses the consultation response of the Highway Authority, which sought additional information. It is supported by a draft Framework CTMP and updated Travel Plan. It has resulted in a number of proposed additional public benefits as follows:

On-site highway works

- A new point of pedestrian and cycle access at the south-eastern corner of the site, repurposing an existing access point
- A 3m walking and cycling route within the site which connects to the western

phase within the H8 allocation

Off-site highway improvements

- The comprehensive highway improvement scheme to Long Copse Lane now includes a new footway on Hollybank Lane and crossings to Redlands Lane, Wraysbury Park Drive and BOAT66a
- Updated plans for Redlands Lane with a commitment from the applicants to fund the delivery of the section of footpath on the south side of Long Copse Lane around the junction of Hollybank Lane to provide a crossing at the western end of Long Copse lane to the BOAT66a multi user link into Hollybank Woods

Financial contributions

- A financial contribution (to be agreed with HCC) towards the Warblington Footbridge project
- £15,000 towards the installation of local Real Time Information for local bus services
- £15,300 towards the potential closure of Wraysbury Park Drive
- £18,500 towards a series of local walking and cycling improvements to Emsworth, local schools, the train station and Westbourne
- £37,500 of measures in the updated Travel Plan (plus £16,500 monitoring and approval costs)

4.32 These measures align with the agreed joint Memorandum of Understanding between the applicants and the Highway Authority that was submitted to the HBLP Examination.

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- 4.33 It is confirmed in the Transport Addendum that the majority of pedestrian movements to and from the application site will be via Redlands Lane and Wraysbury Park Drive. Any additional pedestrian movements to the west of the application site will be limited.
- 4.34 Pedestrians moving west along Long Copse Lane will be able to walk within the Highway (as pedestrians do now) for the short stretch of the lane to connect on to the new footway on the south side of Long Copse Lane on the approach to Hollybank Lane which is being funded by the proposed development. This short stretch of the western end of Long Copse Lane will be improved and widened to between 5.5m and 6.1m thus providing a generous width, the post-development characteristics of which align with the Government's designation of a Quiet Lane.
- 4.35 Pedestrians using this short section of Long Copse Lane to the west of the application site to access BOAT66a will be unlikely to encounter any more than one or two vehicles whilst walking along it even at the busiest time of the day. Should a car encounter a pedestrian then the car will simply pass the pedestrian which is what currently happens now and this will be aided by the excellent forward visibility available.
- 4.36 Extensive public highway land on the southern side of Long Copse Lane currently laid out as a series of driveways, parking areas, verges and landscaping is in practice (and law) available for pedestrians to take momentary refuge as necessary.
- 4.37 The comprehensive drainage scheme which forms part of the agreed improvements will ensure the existing surface water drainage issues are removed which is a significant local benefit and directly removes an existing concern for residents.

Revised Arboricultural Appraisal, Revised Tree Protection Plan and new Covering Letter prepared by Barrell Treecare

- 4.38 This provides further analysis of the mature oaks along Long Copse Lane and confirms that they can all be protected. In response to representations asking that these are considered veteran trees, the Root Protection Areas have been extended accordingly but this does not alter the findings that they can be protected.
- 4.39 In addition, the tree schedule has been amended and is now consistent with The Highway Design Check work and identifies the trees that would need to be removed to implement the s278 off site works as agreed with the Highway Authority and with compensation packages agreed where necessary. These are T2 (Monterey pine), G43, T45, T46 (Low category ash), and G54 (low category immature oak).

5.0 ASSESSMENT OF REVISED SCHEME

- 5.1 This section of the Statement assesses the revised scheme against the new Decision Making Principles in the HDPS.

Decision Making Principle 1 – Application of the Tilted Balance and the Habitat Regulations

- 5.2 The Shadow HRA and suite of supporting documents demonstrate that the proposed package of avoidance and mitigation measures will remove any likely significant effect on the Solent European Sites (either alone or in combination with other plans or projects), as summarised in the previous section. As such, the tilted balance applies in the determination of this application.

Decision Making Principle 2 – Sites not in accordance with the Development Plan where the Council accepts the principle of development

- 5.3 The proposal meets Decision Making Principle 2 as it falls within Table 1 and is in accordance with all the parts of the Development Plan other than in relation to its location outside a defined settlement (Policy CS17 of the Core Strategy and the Allocations Plan as a whole).

The Core Strategy

- 5.4 There is no conflict with Policy CS1 as the proposal will create new open spaces that are located within or close to housing developments, are safe and accessible for children to play and contribute to the borough's green infrastructure. The proposal also supports increased footpath and cycle use through the design of development.
- 5.5 There is no conflict with Policy CS8 as the proposal will provide well-lit footpaths, cycleways and roads with a Lighting Strategy that will avoid adverse impact on designated habitats or the landscape.

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- 5.6 There is no conflict with Policy CS9 as the proposal will deliver a mix of housing at a suitable density of development for the location, taking into account accessibility to public transport and proximity to employment, shops and services in addition to respecting the surrounding landscape, character and built form.
- 5.7 There is no conflict with Policy CS11 as the proposal will protect and enhance landscape and habitats.
- 5.8 There is no conflict with Policy CS13 as the proposal will create new green infrastructure.
- 5.9 There is no conflict with Policy CS14 as the site proposal will make efficient use of resources.
- 5.10 There is no conflict with Policy CS15 as the site will avoid higher risk flood zones and reduce flood risk overall.
- 5.11 There is no conflict with Policy CS16 which seeks to ensure that new development is of high quality design and meets the requirements of future occupiers.
- 5.12 There is no conflict with Policy CS20 which seeks to ensure that highway design responds positively to the characteristics of the area and delivers a high quality public realm for all users.
- 5.13 Having regard to the proposed Section 106 Agreement, there is no conflict with policy CS21 which requires that development mitigates the impact of development on infrastructure.

The Hampshire Minerals and Waste Plan

- 5.14 The submitted Mineral Resource Assessment addresses the Hampshire Minerals and Waste Plan (2013).

The Emsworth Neighbourhood Plan

- 5.15 The application is in accordance with the Emsworth Neighbourhood Plan (2021). The following policies are considered to be of relevance.

- C3 – Public Realm Design

- b) As highlighted on the illustrative masterplan, the proposal will improve the public realm by making 0.99 hectares of high-quality amenity space and 3.2 hectares of multifunctional open space available to the local community on previously private land.

- L1 – General Housing Policy

- b) The proposal will deliver 63 affordable homes.

- L1 – General Housing Policy

- b) The proposed mix of detached, semi-detached and terrace housing, together with a small number of apartments will respond to the needs of Emsworth.

- M1 – Cycle Storage Provision

- b) The proposal will include cycle storage provision based on one per one or two- bedroom dwelling or two per three- or more bedroom dwellings.

- D1 – General Design Policy

a) The proposal will be of high quality and in accordance with the other policies and the other provisions contained within the Neighbourhood Plan.

b) The impact of the proposal and its landscape mitigation measures are addressed in the submitted Design & Access Statement.

c) The illustrative masterplan is in accordance with the Design Checklist.

- D2 – Height, Mass & Materials

a) The height, mass and materials of all new buildings will be appropriate for and typical of the area and will enhance the character of Emsworth.

b) The proposed new buildings will be no more than three storeys in height.

- D3 – Layout, Form & Density

b & c) Having regard to the constraints and opportunities of the site's context, including its connectivity and accessibility to surrounding areas by walking, cycling and public transport, the illustrative masterplan makes the most efficient use of the land. As demonstrated in the submitted Design & Access Statement, a design-led approach determined the capacity of the site and the optimum density has been achieved.

- D4 – Design of Public Spaces & External Areas

a) The proposed public spaces will be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

b) The proposal will make the public realm comprehensible at a human scale,

using gateways, focal points, and landmarks as appropriate to help people navigate the site, particularly towards key features such as public footpaths, green spaces and recreation spaces.

c) The proposal will deliver landscape infrastructure of the highest quality.

d) The proposal will maximise the opportunity for planting trees and creating other soft landscaping where possible.

- D5 – Integration & Strong Connections

a) The proposal demonstrates how the site relates to the wider Emsworth context as the illustrative masterplan connects into clear and convenient links to the town centre, as demonstrated in the Transport Assessment.

b) The proposal will create a welcoming and inclusive neighbourhood, promote active travel, enable the successful integration of the built form within the surrounding area, and deliver wider benefits to residents, such as access to shared amenity space and high-quality public realm.

- D6 – Resource Efficiency

a) The proposal will use high-quality design to minimise the carbon footprint of the development and the neighbourhood area.

b) The proposal will satisfy all the criteria of this policy with further details to be provided at the reserved matters stage. SuDS will be used to minimise the amount of impermeable ground cover; electric car charging will be provided to promote low CO² transport options and local building materials will be used where suitable.

- D7 – Mitigate Light Pollution

a, b & c) As demonstrated in the new Lighting Strategy Technical Note and the previously submitted Lighting Strategy, the proposal minimises light pollution from the development.

Decision Making Principle 5 – Development quality

- 5.16 The updated proposal will result in a high quality, sustainable place exactly as the Submitted HBLP is seeking to achieve. The starting point for the scheme has been to maintain the character of Long Copse Lane and to ensure that all the mature oak trees are retained. Pedestrians and cyclists will be able to move easily within the site area, including east-west movements to minimise use of Long Copse Lane, as requested by the Highway Authority. At the same time, the masterplan is Green Infrastructure-led which not only benefits new and existing residents in terms of recreational amenity space but it also protects and enhances the wildlife in the surrounding woodland. The high quality open spaces within the site will help to respond to changing lifestyles following the coronavirus pandemic such as working from home. All matters are reserved, allowing for the detailed building design to address other aspects of sustainability such as beauty and build quality.
- 5.17 The completed Development Quality Standards Checklist is enclosed which demonstrates compliance with the development quality standards, other than where it has been agreed through pre-application discussions that the Council would prefer an alternative approach. The proposed HDPS states that the Council will give substantial weight where proposals demonstrate compliance with these development quality standards.
- 5.18 All the criteria in Decision Making Principle 5 are met by the proposed development, other than the proposed density being below the usual minimum of 40 dwellings per hectare, based on the clear pre-application advice and H8 policy wording to reflect the local character and structure the masterplan around landscaped buffers. The proposed amount of dwellings is the optimum amount having regard to all the technical evidence, including landscape,

heritage, arboricultural and ecological interests around the site.

5.19 The remaining Development Quality Standards will be secured by condition and S106 Agreement, as follows:

- Infrastructure will be provided which is needed to make the development acceptable in planning terms, in line with the Council's Infrastructure Delivery Plan and Developer Contributions Guide. This will comprise a combination of on-site and off-site provision.
- The proposal will be designed to a high standard, and the illustrative masterplan has been prepared to align with the Borough's Design Guide and the Emsworth Neighbourhood Plan. The submitted Design & Access Statement identifies local character and distinctiveness and shows how this has been taken into account in the illustrative masterplan.
- The proposal will create new and improve existing pedestrian and cycle route linkages which connect to all parts of the development and facilitate easy and safe access to education, employment, and the natural environment for all users.
- The proposal incorporates a comprehensive ecological strategy, which achieves biodiversity net gain, and includes
 - i. The retention and integration of any protected trees and hedgerows.
 - ii. The retention and enhancement of any local nature conservation designations on or affected by the development;
 - iii. Mitigation for any protected species, including appropriate buffers;
 - iv. The creation of green linkages and wildlife corridors within and through the site, making the best use of existing natural features
- The proposal will provide electric vehicle charging infrastructure for each new residential unit with private off-street parking.
- The nationally described space standards for new homes will be met.

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- Outdoor private and/or communal amenity space will be provided for all residential units.
 - A reduction in CO2 emissions of at least 19% of the Dwelling Emission Rate (DER) compared to the Target Emission Rate (TER) of Part L of the Building Regulations will be achieved, as set out in the Energy Strategy for the site.
 - The submitted drainage strategy incorporates appropriate Sustainable Drainage Systems (SuDS) to an adoptable standard and has been designed to reflect the particular site conditions, including permanently solving the existing flooding problem on Long Copse Lane.
 - The sustainable management and maintenance of any new 'common parts' will be achieved through a S106 legal agreement.
 - A minimum of 30% of homes will be affordable.
 - A minimum of 30% of homes will be designed to meet Part M4(2) of the Building Regulations.
 - A range of dwelling types and sizes will be provided to meet local housing need, including 35% of the overall housing mix as two bedroom homes (unless locally identified need evidence indicates an alternative approach should be taken).
 - The proposal will contribute towards a community officer, to help new residents in the development integrate into existing communities.
 - High quality on-site open space including play space will be provided to a minimum standard of 1.5ha per 1,000 population. Part of this requirement will be provided in the form of community food growing space, to a standard of at least 0.2ha per 1,000 population.
 - 2% of homes will be designed to meet Part M4(3) of the Building Regulations as part of the affordable housing provision.

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- The proposals will support local people in accessing employment and skills training either through a financial contribution or a site specific skills and employment plan.

6.0 SUMMARY AND CONCLUSIONS

The presumption in favour of sustainable development applies

- 6.1 The Council is currently in severe difficulties with housing land supply. The Housing Delivery Test has fallen below 75% and supply has fallen below four years, which is acknowledged by the Council as a substantial shortfall. The presumption in favour of sustainable development applies as set out in paragraph 11 of the NPPF.
- 6.2 The proposal does not accord fully with the Havant Borough's Core Strategy (2011) and Allocations Plan (2014) because the site is not allocated for residential development or within the defined urban area of those documents. However, very limited weight can be afforded to the conflict with these policies because they are based on out-dated levels of housing need.
- 6.3 The proposal accords with the remaining parts of the Development Plan as set out in the previous section.
- 6.4 Several housing schemes have recently been approved, or have received a resolution to grant, by the Council as departures from the out-of-date Local Plan. Of the remaining unapproved sites the Council has found to be suitable in principle, many are delayed at the Development Management stage with technical constraints which may never be fully overcome. Nor are there sufficient new speculative sites being brought forward by the development industry.
- 6.5 The Council is also currently unable to identify enough sites to be able to produce a new Local Plan. The delivery issues with the sites identified as suitable in principle means that there is currently not enough housing land to create a plan-led framework for meeting local needs, as the Government expects.
- 6.6 These problems mean that identified housing need is not being met, resulting

in problems within the Borough that include unaffordability, overcrowding and homelessness. Any cross-boundary solution to potentially alleviate these problems is many years away.

- 6.7 It is now clear from previous planning decisions and current Council statements that the contribution to housing supply from about 210 dwellings - including provision of 63 affordable homes - should be given substantial weight in the planning balance.

The proposal constitutes sustainable development

- 6.8 The land north of Long Copse Lane has long been identified as suitable and deliverable site for housing development, from its inclusion as a site for early release in the original Housing Statement, its inclusion in every iteration of the HBLP and now its proposed inclusion in the new HDPS.
- 6.9 The wider allocation for Policy H8 in the Submitted Plan has been scrutinised at examination and no soundness or legal compliance issues have been identified by the independent Inspectors. Nor are there any other concerns raised in the Inspectors' Interim Findings Report which are material to the site in question.
- 6.10 The proposal will meet all the relevant technical requirements of the Submitted HBLP and proposed HDPS, as set out in the previous section. All the site-specific criteria in Policy H8 and the Decision Making Principles of the HDPS will be met. The proposal is compliant with the development quality standards of the HDPS, other than where it has been agreed through pre-application discussions that the Council would prefer an alternative approach (lower housing density). As amended by the new information pack, sufficient technical detail is now available for the Council to fully understand the impacts of development and how mitigation will be secured by way of conditions and S106 requirements.
- 6.11 There are no adverse impacts of approving the proposal that would significantly

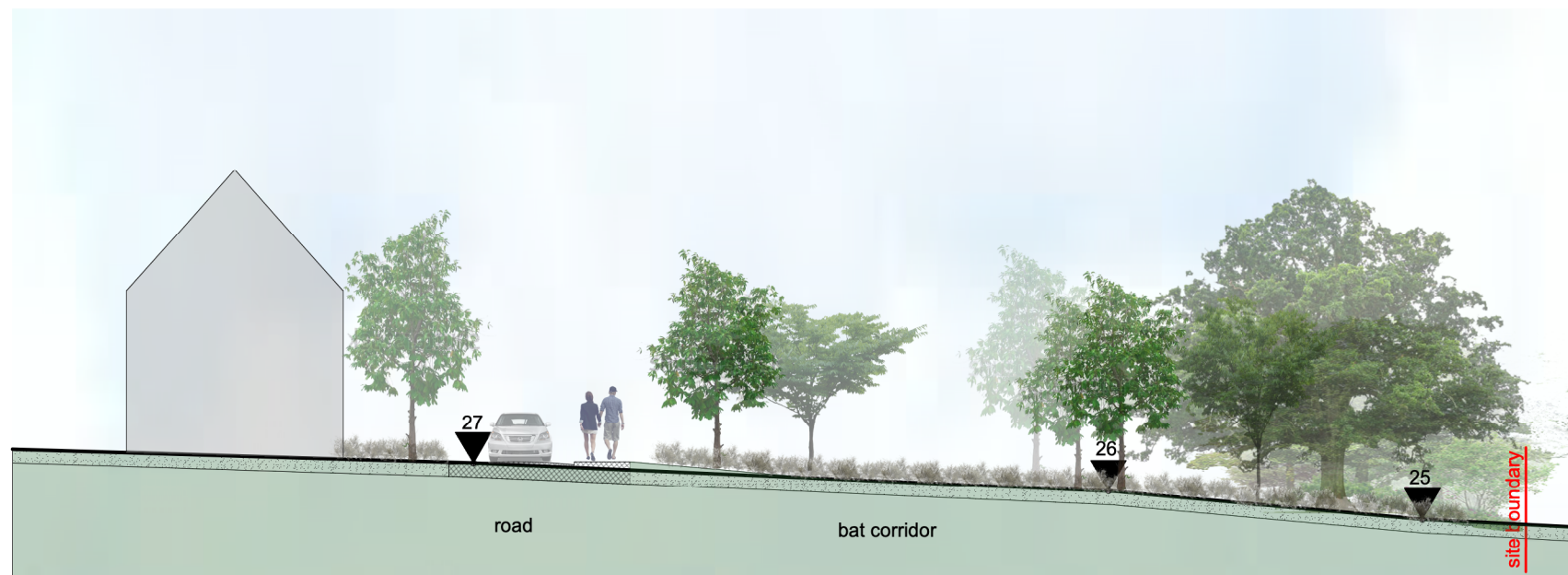
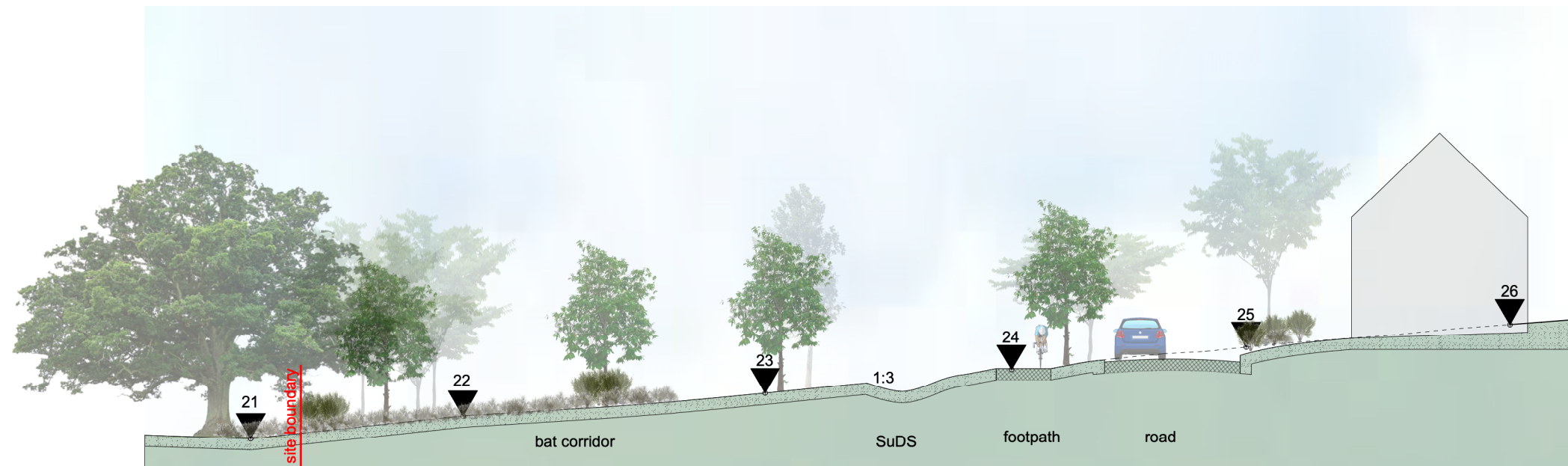
and demonstrably outweigh the benefits, when assessed against the policies in this NPPF taken as a whole.

- 6.12 There are no development plan policies to protect areas or assets of particular importance that provide a clear reason to refuse the proposal. It is some considerable distance from the constraints listed in footnote 7 of the NPPF and it has been demonstrated that any identified potential impacts can be mitigated.
- 6.13 The Shadow HRA and suite of supporting documents demonstrate that the proposed package of avoidance and mitigation measures will remove any likely significant effect on the relevant European Sites identified by Natural England (either or alone or in combination with other plans or projects).
- 6.14 The proposal has been subject to detailed pre-application discussions as well as direct engagement with the key statutory consultees such as the Highway Authority and Natural England.
- 6.15 The proposal has also been subject to extensive public engagement including a Development Control Forum and two public exhibitions. It has evolved over several years to produce a package of environmental enhancement and local infrastructure which resolves all the relevant planning impacts.
- 6.16 The applicants have listened to all reasonable consultation responses and in particular the statutory consultees and have brought forward a number of amendments to directly address concerns raised through amendments to the submitted information. It has been demonstrated that the proposed number of homes can be delivered on site and that the number of benefits can be secured. These include significant new planting along the site boundaries, new public open spaces on land that is currently private and without any rights of way and new and improved routes for pedestrians and cyclists.
- 6.17 The site will go beyond the minimum standards of the policy to become an exemplar of sustainable development. It demonstrates best practice in

strategic mitigation endorsed by Natural England. It encompasses both Protected Species habitats and nutrient offsetting to achieve a level of biodiversity net gain far beyond other sites. The local highway works agreed with the Highway Authority will also integrate surface water flooding and pedestrian movement enhancements in an integrated way with the focus on maintaining the visual character of the lane and the ecological and arboricultural value of the mature oak trees. The removal of an existing surface water flooding issue is a significant benefit.

- 6.18 The proposal would also bring some economic benefits through construction and through the additional spend generated by new residents, who would also help to sustain local and retail services.
- 6.19 The site is one of the most straightforward sites left to develop in the Borough. It is currently a patchwork of residential, business and agricultural uses with existing buildings scattered across the site. It was not previously brought forward for development because it is in multiple ownerships and some of the owners were previously not ready to sell. Land & Partners have since brought together the majority of owners within the H8 allocation area into a single legal agreement that will ensure that a housebuilder will be able to acquire a single site to deliver around 210 dwellings. This assembled site is now able to make a significant contribution to the backlog of homes that the Borough requires.
- 6.20 For all the reasons set out above, the proposal would contribute to the objective of significantly boosting the supply of homes within the Borough and would bring many environmental benefits. As such, it is a well-justified departure from the development plan.

**APPENDIX 1 – DETAILED CROSS-SECTIONS, NORTHERN AND EASTERN
BOUNDARIES**



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LAND NORTH OF LONG COPSE LANE, EMSWORTH - CROSS SECTIONS