

LETTER OF OBJECTION

The reduction in the proposed housing number, revised description and amended plans are acknowledged, in respect of the application for planning permission for the proposed development. However, will you please record that the proposed development as now amended, does not in any way diminish our continuing and resolute objection to the principle of development in this case, for sound, valid, material and proper planning reasons, already conveyed to the Council. Moreover, the principle of development in this case has not as yet been established.

The site in question is an area of land to the east of Westwood Close and which adjoins the eastern (rear) boundaries and gardens of dwellings in Westbourne Avenue; the eastern boundary of the green space is defined by the county boundary between Hampshire and West Sussex. For the purposes of this statement, the site will be referred to as Westwood.

In land use terms, Westwood is within an area of greenfield/open space land, in agricultural use for grazing. A public footpath which is part of the Sussex Border Path network runs through the site. The Westwood site forms part of an area of open green space of particularly local importance to the communities of Emsworth and nearby Westbourne and which intensively serves both communities daily, with its leisure, recreation, visual amenities, wildlife interests and wellbeing. The native hedgerows which run the full length of the western boundary of Westwood and eastern boundary of green space produce an abundance of blackberries, and sloe berries in the months of August and September, harvested by local residents.

Westwood is presently situated in Flood Zone 1 on the extant Environment Agency Flood Map and is immediately adjacent to Flood Zone 3, which represents the River Ems floodplain. There is therefore significant potential for flood risk to such a vulnerable site. Westwood is also located within an area with a history of drainage capacity issues.

Surface water management and the provision of sustainable drainage systems are frequently contentious matters, especially in areas of potential risk of fluvial flooding. The successful initial installation of SuD's is dependent to a large extent on contractor's competence and ever hopefully the avoidance of performance defects, which sometimes happens. SuDs are essentially also dependent on regular monitoring and maintenance and there are significant concerns in this case as to how regular servicing would be guaranteed for unadopted roads.

Described in the Strategic Housing Land Availability Assessment (SHLAA) 2013, as "Land east of Westbourne Avenue", the greenfield/open space land between Emsworth and Westbourne was considered by the Borough's Planning Policy Team, as having limited development opportunity on the grounds of "Potential flood issues at site and size, shape and stream corridor issues would limit development opportunity." The land did not feature

in the Core Strategy (2011) and was not identified for development in the Allocation Plan (2014) or the adopted Local Plan Housing Statement (2016), presumably for the reasons set out in SHLAA (2013).

Westwood is now presented in the Draft Havant Borough Plan 2036, for residential development to provide “about 35 dwellings” – Policy H10 refers. As a prospective development opportunity, the precise boundaries of Westwood by devise fit neatly into a flood zone of low probability. There is an undisputable problem with such an overly-convenient perception and that is that flood zones can be subject to rapid change from regular amendments made to the Environment Agency’s Flood Maps, in response to climate change increase. Added to this, Westwood is already immediately adjacent to a stream corridor and an appropriate zone of high flood risk probability, from which it can and should be concluded that Westwood is altogether not developable.

It would also seem that Westwood may have been construed as a windfall site (a site not specifically identified as available in the Development Planning process but which unexpectedly becomes available) albeit such a consideration would be negated by the fact that “windfall” by definition is normally previously developed land (pdl), which strictly is not applicable in this case. Accordingly, it is emphasised that this is not “brownfield” land.

The adopted Local Plan Housing Statement (2016), concluded which strategic sites could deliver sustainable development, sufficient to address the Borough’s housing need up to 2036. The Westwood site has been presented in the Draft Local Plan 2036, as a non-strategic development opportunity. However, this initiative would seem to have limited merit, considering that the site was rejected at the SHLAA stage and by reason of “size and shape” would provide a relatively low yield of about 30 dwellings; and which therefore questions need and justification. (The Framework advocates that the supply of new houses can best be achieved through planning for large scale development.) Moreover and most importantly of all, the Westwood development would seriously reduce the green gap between Westbourne and Emsworth.

The material importance of the area of local green space between Westbourne and Emsworth and its preservation for the benefit of both communities cannot be over –stated.

The green space is demonstrably special to both communities and holds a particular local significance for its historic, recreational and environmental values, tranquillity, wildlife interests, local character and appearance; it is much used and much appreciated.

Development of the Westwood site would inevitably result in undesirable and extremely harmful impact upon the significant wild life corridor, environmental and quality of life amenity benefits the green space provides and enjoyed by the communities of Westbourne and Emsworth; the development would also likely prejudice pedestrian access through what would remain of the green space (Flood Zone 3) during winter months, due to the normally inherent wet ground conditions and increased risk of flooding to the land.

The Westwood development would certainly generate an undesirable increase of vehicular movement and unavoidable on-street parking amounting to general clutter in Westwood Close and Westbourne Avenue.

The vehicular access arrangements to serve the development would be less than satisfactory and vehicular movement would be exacerbated by the horizontal alignment of Westwood Close.

Summary Final Comments

- The Government's planning policy Framework must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in plan making and planning decisions.
- The Framework relevantly states that:- "our natural environment is essential to our wellbeing and it can be better looked after than has been"; and "...planning should not simply be about scrutiny;" "... planning has tended to exclude rather than to include people and communities". "In part, this has been a result of targets being imposed and decisions taken by bodies remote from theirs." Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this."

- The Draft Emsworth Neighbourhood Plan under Policy L5 “Avoiding Settlement Coalescence”, states:- “Housing development proposals of a non-strategic nature will only be permitted if they do not impinge on the current gaps between Emsworth and its neighbouring settlements, nor encroach on the protected landscape area to the north-east or the waterfront area to the south”; and also states;- “Protecting green gaps between settlements will retain the landscape quality with benefits to wildlife, leisure, recreation and mental wellbeing.” Protecting green gaps between settlements so as to preserve their separate identities is a fundamental principle in proper planning terms. The existing gap between Emsworth and Westbourne is already extremely narrow in proportion to its overall length and compares unfavourably with other gaps in the Borough. If the Westwood development were to proceed the gap’s width would be reduced to a maximum of 57m; and at one point in a northerly direction would be as little as 15m; for most of its length adjacent to the development it would be less than 50m. The loss of existing open space would be contrary to Framework policy and the Westwood development would be at odds with the Westbourne Neighbourhood Plan already submitted and examined and the Draft Emsworth Neighbourhood Plan, in respect of coalescence avoidance aspirations.
- The Government’s Framework states that – “Existing green space and recreation land should not be built on unless an assessment has been undertaken which has clearly shown that open space or land to be surplus to requirements.” Please see para 74; from which it should be noted that additional requirements need to be met. Accordingly, it is unmistakably emphasised that any promoted non-strategic housing development within the existing Emsworth – Westbourne green space would strictly be contrary to Framework policy. Added to that, as far as is known, no such assessment has been undertaken.
- Such a needless and unjustifiable prospective development at Westwood does not demonstrate that the development would provide wider sustainability benefits to either Westbourne or Emsworth communities.
- The presently un-protected green space between Westbourne and Emsworth should be formally designated as Sussex Border Path Local Green Space in the Havant Borough Local Plan 2036, in accordance with Framework Policy, please see paras. 76 and 77; for which materially there is a compelling case, being fully compliant with requisite criteria and which essentially would also serve to consolidate what is an existing fragile gap; which are more just and creatively justifiable planning policy options.
- Accepting that the draft scheme for Westwood development was displayed for presentation purposes as a conceptual layout, the design standard was of a poor quality, producing a sub-standard form of development.
- As a matter of technical detail, the County/Havant Borough boundary shown on the O.S. Location Plan relevant to the non-strategic site for the Draft Havant Borough Local Plan 2036, is incorrectly delineated.

Additional and Re-affirmed comments

- Potential flood and stream corridor issues associated directly with the Westwood green field/open space land continue to be a serious concern. Significantly, it is reiterated that this area of land was rejected in the Core Strategy (2011) and was not identified for development in the Allocation Plan (2014) or the adopted Local Plan Housing Statement (2016), for the valid and material reasons stated. In relation to these relevant and material considerations, the adopted Local Plan Housing Statement (2016) pertinently has established that sufficient strategic sites that can deliver sustainable development are sufficient to address the Borough's housing need up to 2036; from which it should be concluded that development of the Westwood open space is both needless and unjustifiable.
- Altogether apart from our objection to the development proposals and the many objections from within the closely neighbouring communities of Westbourne and Emsworth ratepayers and objections from other agencies; there is a perception that the Council has done little to discourage the promotion of this development, whilst exercising disregard for relevant material and technical considerations and the numerous issues of valid concern (loss of green space, reduction of strategic gap, flood and highway issues). This notion was substantiated with the Council's decision to include the site (albeit as non-strategic) in the Draft Havant Borough Plan (2036), for which it is reiterated there is no immediate discernible need or justification.
- There is or should be more to forward planning policy making and performance than a Council's meek submission to politically driven paranoid preoccupation with housing provision with no discernible restraint and at any cost to the wider needs of the Borough and harm to the quality of life and wellbeing of existing communities.
- Notwithstanding the reduced scale, the amended scheme as now proposed for the development proposals does not overcome our concerns and reasons for objection. Accordingly, we respectfully urge the Council to Refuse planning permission on the following grounds:-
 - Premature pending the resolution of flood issues
 - Premature pending the resolution of Green Space designation
 - Premature pending the formal adoption of the Havant Borough Local Plan 2036
 - The Framework is a material consideration in planning decision; as such, the proposals are strictly premature pending the completion of the prescribed assessment of the un-protected green space between Westbourne and Emsworth, in accordance with paras. 76 and 77.

