

Mrs D Haywood
Planning Service
Havant Borough Council
Public Service Plaza
Civic Centre Road
HAVANT
PO9 2AX

21st August, 2018

Dear Mrs Haywood,

APP/18/00672: Land off Westwood Close, Emsworth

Proposed erection of 46no. dwellings with associated parking, access from Westwood Close, diversion of Havant Footpath 73, landscaping and surface water drainage. Felling and works to trees within Area A1, subject to TPO 2071.

Letter of Objection

I object to Application Number APP/18/00672 on the following grounds:

1. Impact upon existing residents

This proposed development would cause an unacceptable increase in noise and disturbance to the residents of Westwood Close, some of whom have lived in the Close for more than 30 years. Much of this impact would result from vehicular traffic that the new housing would generate, given that the numbers of cars, vans and other vehicles travelling in and out of Westwood Close would be likely to quadruple. In addition to the impacts of noise and pollution, some residents would suffer from vehicle headlights tracking across their frontages and shining directly into their living accommodation in conditions of low light and darkness.

The turning head at the end of the Close has provided a safe play area for young children on many occasions and frequently serves as visitor parking for cars and vans. These are facilities that would be lost if the turning head were altered to provide vehicular access to the development. There is no doubt that the proposed development would cause unacceptable and permanent harm to the living conditions and quality of life of existing Westwood Close residents through increased noise, pollution, disturbance and loss of privacy.

2. Flood risk and prematurity issues

Paragraph 49 of the National Planning Policy Framework July 2018 (NPPF) states that "...arguments that an application is premature are unlikely to justify a refusal of planning permission...". However, as will be explained in the following paragraphs, I strongly believe that prematurity is a crucial

issue in relation to the risk of flooding for the development itself and potentially for nearby properties.

Havant Borough Council has previously discounted the field in which this site is located as being unsuitable for housing development. This was done under site reference UE27 in successive Strategic Housing Land Availability Assessment documents published by the Council from 2012 onwards up to and including January 2017. During this period the Council reported that the site had "Potential flood issues at site and size, shape and stream corridor issues would limit the development opportunity". However more recent pressures on the Council to identify sites capable of accommodating the Borough's predicted housing needs brought this site back into consideration. In response to this I would contest that the reasons why the Council found it undevelopable in 2012 are even more valid today.

Flood risk has been identified as a matter of major concern regarding the application site, as evidenced by the Environment Agency's (EA's) comments earlier this year upon the Havant Borough Draft Local Plan 2036. In this regard it is entirely appropriate that a site-specific Flood Risk Assessment (FRA) report, dated June 2018 and produced by Rogers Cory Partnership (RCP), is included in the application documents.

Recent email correspondence between RCP and the EA, reproduced in Appendix E of the FRA, refers to the EA's updated modelling of the River Ems which is currently in progress and expected to conclude early in 2019. From this correspondence it would appear that the EA anticipates that the Flood Zone 1 land, in other words the application site, will be reclassified as Zones 2 and 3 which indicates a higher assessed risk of flooding.

In response to concerns expressed by RCP, the EA has stated that it would respond to any planning consultation received before its revised flood map becomes available on the basis of "the best available information at the time of consultation". In view of the community safety issues that could result from a planning decision taken before the EA's current study work has concluded, I believe it would be irresponsible for the Council to consider granting planning permission for housing on the application site at this time.

In order to meet NPPF requirements (paragraph 163) the site-specific FRA must satisfy the Council that there would be no increase in flood risk to existing properties as a result of the proposed development. This is clearly a subject area requiring appropriate technical expertise but, having read the application documents, I would query whether the potential impacts of the proposed development upon existing nearby properties, especially in Westwood Close, have been adequately investigated and addressed.

The threat of flooding from surface water is primarily a matter for Hampshire County Council to comment upon in its role as Lead Local Flood Authority. HCC's role is assumed to include detailed scrutiny of the technical reports supporting the application. However it is not clear at present that the risk of surface water flooding has been adequately assessed, either in respect of the site itself or potential impacts on nearby properties. Based on the weather patterns of the past 20-30 years,

together with the growing evidence of climate change, such flood risks are expected to increase in the years ahead.

3. Transport implications

The width and alignment of Westwood Close was designed to serve 14 houses and would be inadequate as the sole vehicular access to the proposed number of new dwellings. As in most residential areas on-street parking is a daily fact of life in Westwood Close, often creating access difficulties for larger vehicles such as dustcarts. It is noted that the Transport Statement supporting the application contains photographs of Westwood Close showing a complete absence of vehicles parked on-street. Such conditions are far from typical and therefore give a very misleading impression.

The Transport Statement also puts forward unconvincing evidence about the proposed development's sustainability. Existing bus services within a reasonable walking distance of the application site are very sparse, with a two-hourly frequency at best and no services at all during evenings or on Sundays. For cyclists the main feature is the existing length of cycle track linking Westbourne Avenue to Westbourne Road but attractive segregated facilities in the local area are otherwise few and far between. There are only limited shopping facilities, school places and jobs within a reasonable walking distance from the application site. It is therefore inevitable that a high proportion of journeys generated by the proposed development would be undertaken by car rather than by sustainable transport modes.

4. Green space and erosion of the Emsworth / Westbourne gap

The field including the application site is a natural green corridor adjoining Havant Borough's boundary with Chichester District and separating Emsworth from the village of Westbourne. It forms part of an area of 'open green space' to which the public footpath provides a popular and convenient means of access for the communities of Emsworth and Westbourne. This green corridor is enjoyed by visiting ramblers and local residents alike for its leisure and recreation opportunities as well as its wildlife interests which include woodpeckers, tawny owls, bats, frogs, toads and newts.

Several requests have been made in recent years for this green corridor to be formally designated as a Local Green Space. It clearly satisfies the criteria set out in NPPF paragraph 100 and in paragraph 5.49 of the Havant Borough Draft Local Plan 2036. The application proposals would inevitably damage both the amenity value of this tranquil green corridor and its biodiversity. Given that the existing field area satisfies national and local criteria the opportunity to preserve a valuable community asset must not be thwarted by the proposed development.

The Havant Footpath 73 runs along this green corridor and is a popular and historic public right of way linking the communities of Emsworth and Westbourne. It also forms part of the Sussex Border Path, an important long-distance walking route that follows the inland boundary of the historic county of Sussex. According to the Ramblers' Association the main

attraction of the Sussex Border Path is its 'surprisingly remote and unspoilt quality in this particularly crowded part of England'. This is certainly a fitting description for Havant Footpath 73.

The applicant's proposed diversion of the footpath would not significantly lengthen walking distances. However, if the footpath is realigned to run 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 risk of flooding. Furthermore, the intrusion of new housing into the narrow gap separating Emsworth and Westbourne would permanently damage the footpath's rural character and obstruct the views of Westbourne's church spire that contribute significantly to the path's rural appeal. Such an outcome would conflict with the NPPF requirement (paragraph 98) that 'Planning policies and decisions should protect and enhance public rights of way and access...'

5. A development that is not needed

The application site largely occupies the same land as is currently proposed for a housing allocation under Policy H10 of the Draft Local Plan 2036, published for consultation in January 2018. Around that time the Council stated that the Local Plan proposed allocations could accommodate predicted housing needs across the Borough up to 2036 with a buffer of more than 200 dwellings.

Both the Policy H10 site and the application site have relatively modest residential capacities and the Council is aware that this land suffers from significant development constraints. In May 2018 the Council announced its intention to review the Policy H10 site's suitability for a Local Plan housing allocation. The Council has also confirmed that the Draft Local Plan contains sufficient sites to accommodate the Borough's assessed need for new homes together with a reasonable buffer even if this site were not developed.

Whatever the merits of the development proposed in the planning application I strongly believe that these would be outweighed by the permanent adverse impacts that would be inflicted on the local communities of Emsworth and nearby Westbourne. I therefore request that planning permission for housing at Land off Westwood Close be refused – this location is unsuitable for the proposed development which is neither wanted nor needed.

Yours sincerely

A large black rectangular redaction box covering the signature and name of the author.