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15 February 2018

Dear Sir

Draft Havant Borough Local Plan 2036

Consultation response of Westbourne Parish Council

Westbourne Parish Council would like to respond to the consultation on the Draft Havant Borough Local Plan 2036. As a Parish Council located within West Sussex but immediately adjacent the county boundary with Hampshire and Havant Borough, the Parish Council is directly affected by some of the key proposals in the Draft Local Plan. As Chair of the Parish Council I would ask that careful consideration is given to the objections and concerns expressed below.

The Parish Council accepts that the Borough is faced with delivering significant levels of new housing to meet its share of the Sub Regional and Government growth targets that have been agreed. It recognises that substantial work has been undertaken to identify potential housing development sites and that options for suitable new sites are becoming limited. This in turn is forcing the Borough Council to consider greenfield development sites that have been protected from development for many years. However, whilst such pressures are acknowledged it is increasingly important, as the urban population expands, to ensure that the countryside envelope surrounding the Borough and separating it from neighbouring communities is protected, especially where that countryside performs important strategic functions such as;

- Maintaining the separate identities of communities
- Protecting habitats for endangered species
- Providing capacity for water management and the protection of urban areas from flooding
- Providing space for recreation, access and enjoyment of the countryside

The Parish Council would make a very strong case that the countryside between the urban fringe of Havant Borough and the village of Westbourne performs the functions listed above. This local gap has been protected from development by planning policy of the local authorities on both sides of the boundary for many years and should continue to be

protected. On this basis there are key housing development proposals, H6 and H10 included in the Draft Local Plan to which the Parish Council would object.

The Parish Council has prepared a Neighbourhood Plan which is now nearing its final stage of approval. It was examined at a public hearing in October 2017 and the examiner's report is anticipated imminently. The discussion at the hearing indicated a favourable outcome for most provisions of this plan and, as such, the Parish Council would suggest that the policies in the Neighbourhood Plan should be afforded significant weight by the Borough Council in its deliberations on the Draft Local Plan.

The Neighbourhood Plan contains Local Distinctiveness Policies (LD1, LD2, LD3, LD4, BD1 and BD2) to define and protect the local gaps around the village, maintain its character and identity and also to protect the heritage and biodiversity of the natural and built environment. Although these policies can only affect land within the Parish, they were prepared carefully from a sound evidence base that took into account the existing and long established policies of the Borough Council adjacent to the boundary, especially those that have similar objectives of protecting the open countryside and which perform the important strategic functions mentioned above.

The Parish Council has also given careful consideration to the evidence base that the Borough Council has prepared to support the Draft Local Plan, in particular The Landscape Character Appraisal which examined the value and function of the open landscape around the Borough. This critical document looked at various parcels of land, assessed the characteristics and functions of each parcel and made recommendations as to whether the land would be appropriate for development. The open countryside that stretches from Hollybank Woods around the north east boundary of the Borough, alongside the village of Westbourne and then southwards to the rear of the existing houses in Westbourne Avenue up to the line of the A27, is identified as a single parcel of land - LCA21.4. Both of the sites mentioned above ie H6 and H10 are included within this parcel of land.

In respect of this parcel of land the study concludes;

*"it is recommended that **no part** of land parcel LCA21.4 is taken forward for potential growth as the open landscape remaining outside of the 'country park' is particularly sensitive as part of the pasture landscape to the Forest of Bere in the north and the riverine landscape of River Ems in the south."*

This critical analysis demonstrates the sensitivity of the countryside gap between Westbourne and Emsworth. The Parish Council would urge the Borough Council to remove these sites from the Draft Local Plan, as they are contrary to the long established principle of maintaining the separate identity of communities and protecting the essential character of the open land that defines the setting of Westbourne Village.

Apart from this overarching strategic objection, the Parish Council has more detailed objections to the housing sites H6 and H10, and a more general concern about the strategic development proposal at Southleigh identified as KS5 in the Draft Local Plan. The concerns are set out below.

Southleigh Strategic Development Proposal KS5

The Parish Council is not opposed to this development in principle but is concerned about the potential for an increase in the level of traffic generation from the site that flows through Westbourne. The nature and scale of this impact is difficult to predict, especially as the Borough Council has not yet completed a Transport Impact Assessment (TIA) as part of the

evidence base for the Draft Local Plan. The village is constricted by narrow roads with on street parking and is generally unsuitable for significant volumes of through traffic. However, Westbourne is increasingly being used by traffic flowing from Emsworth and the eastern areas of Havant on route to Chichester or Rowlands Castle, the A3M and beyond. The level of traffic generated by the Southleigh proposal will add to this growing volume of traffic passing through the village. This would be an even more problematic issue if the proposal does not include effective connections to the A27, a critical matter still to be resolved. The Parish Council would urge the Borough Council to consider this carefully. The TIA should be completed without delay and its findings on traffic generation and routing will be essential in considering the impact of this major scheme on Westbourne. The Parish Council cannot fully respond to this particular issue until the results of this work are available; meanwhile it would object to the potential for undesirable extraneous traffic from this major development using the route through Westbourne.

The Parish Council would argue strongly that the findings of the TIA may require mitigation measures to be funded by the strategic development at Southleigh in order to deter and control traffic passing through Westbourne Village. The Parish Council reserves the right to comment further when the TIA has been completed and would argue that the principle of endorsing this development should not be finalised until all parties have had the opportunity to consider the findings of this work.

Land north of Long Copse Lane H6

This proposed development is indicated to provide 260 dwellings together with a convenience shop. The Parish Council has already outlined its objection on the basis of the established local gap policies set out above; however, there are further detailed objections as set out below.

The potential for surface water drainage from this site to aggravate the known flooding problems of the River Ems is a key concern. It is appreciated that the development would probably be designed with Sustainable Urban Drainage systems (SUDS) but the long term maintenance and functionality of such systems is dubious. The tendency of Water Authorities to avoid adoption of such systems is a major concern. The Parish Council would anticipate that there would inevitably be increased surface water drainage from this site, which would find its way into the River Ems and would increase the flooding problems and affect water quality downstream.

The site is not a sustainable location for housing development given its location at the northern edge of Emsworth, which is remote from local community infrastructure and services within Havant Borough. The nearest community infrastructure to the site including a full range of local services is actually across the local authority boundary in Westbourne. However, the connections to Westbourne are not satisfactory as the most direct route is along Long Copse Lane, which is a narrow and twisting hedge-bound lane. There are no footpaths, so any increased use by traffic from this proposed development would create serious problems for the safety of the many pedestrians, horse riders and cyclists that use this lane.

The proposed convenience store will not be commercially viable as it will have a severely limited catchment of the proposed 260 new houses plus a small number of existing residents along and in the vicinity of Long Copse Lane. There will be no passing trade, which is a significant factor for viability. Therefore, it is highly likely that the convenience store will not proceed. There are already convenience stores at Westbourne and at Southleigh Road that serve the existing local population.

The Parish Council consider there will be significant levels of vehicular traffic generated by this proposed development using Long Copse Lane eastwards, to gain access to routes along Monks Hill to Chichester, the A3M and Rowlands Castle and also to gain access to Westbourne Village for local services, pubs, shops, etc. Long Copse Lane is not suitable for any increased traffic and the visibility at the junction with North Street/Monks Hill in Westbourne is very limited.

If this development were to proceed, the Parish Council would expect that a solution must be found to provide safe routes for pedestrians, horse riders and cyclists along Long Copse Lane without removal of hedges or destroying the rural character of the lane. It would also be essential for the visibility at the junction of Long Copse Lane and North Street/Monks Hill to be addressed. The Parish Council cannot see how these issues could easily be resolved.

Without prejudice to the Parish Council's objections to this development, if the proposed allocation is agreed and a solution to these highway safety issues on Long Copse Lane can be found, there are some additional infrastructure requirements that would need to be addressed. Given the obvious relationship that the new development would have with Westbourne due to its close proximity to the village, the Parish Council would expect infrastructure contributions to be made available for environmental enhancements and traffic mitigation measures within the Village Square. The pressure of through traffic and demand for parking space in the Square is already a critical problem that the Parish Council is actively seeking to resolve with a scheme of environmental and highway improvements.

Land at Westwood Close H10

This development proposal was subject to a Development Consultation Forum at Havant Council Offices on 16 January 2018. Westbourne Parish Council was invited to make representations at that meeting and attached as an appendix to this submission are the comments that were made in objection to that proposal. The more detailed concerns over and above the objection in principle already made can be summarised as:

- The proposal will reduce and erode the local gap between Emsworth and Westbourne
- the appearance of the development will create a hard urban edge that strongly damages the rural character of the countryside gap
- The position of the road with street lighting at the edge of the development will further add to this unwelcome urban appearance
- The strategic footpath will be relocated into the most waterlogged area of the floodplain of the River Ems (which is designated as flood plain 3) making it unusable in winter
- The use of road based SUDS systems for drainage is unsatisfactory especially with no anticipated public adoption of the roads or drainage systems, which will lead to long term maintenance problems and potential failure with subsequent increased flooding and run off into the River Ems
- The development will damage wild life and the surveys already undertaken are considered to be insufficient and unreliable

Finally, on this site and once again without prejudice to the objections raised above, the Parish Council notes that the developer has stressed its sustainability credentials, being close to local services in Westbourne Village. As with the comments made in relation to the Long Copse Lane site H6, it is inevitable that this development will lead to increased use of the Westbourne Village by new residents both on foot and by car. On this basis the Parish Council would urge that, if the development proceeds, there should be infrastructure

contributions made by the developer towards the environmental improvements and traffic mitigation measures that are proposed by the Parish Council for the Village Square.

The Parish Council is aware of the need for the Borough Council to meet its targets for the identification of sufficient sites to accommodate new housing and population growth. Given that the Parish Council has suggested that two urban edge sites are deleted for the reasons outlined above it is appreciated that the number of anticipated units (295) from these sites must be made good elsewhere. It is suggested that this could be achieved in a more sustainable way by a combination of two methods. Firstly, the overall density of the strategic site at Southleigh KS5 could be increased. Secondly, the overall density of other urban sites, especially those in or adjacent to town centres, should also be marginally increased. This would achieve the overall target for new housing units by marginal adjustment and it would also have the benefit of maximising the potential of existing and proposed investment in community infrastructure serving those sites. This is genuinely a more sustainable and strategic approach to achieving housing growth than using sensitive greenfield sites at the edge of the urban area, which are not well served by community infrastructure and services.

In conclusion the Parish Council would urge the Borough Council to give careful consideration to its objections and concerns in respect of the Draft Local Plan and would request amendments in accordance with these comments.

Yours faithfully



Richard Hitchcock
Chairman, Westbourne Parish Council

Appendix re Westwood Close proposal H10

Comments by Cllr Roy Briscoe Chair of Westbourne Parish Council Planning Committee

At the Development Consultation Forum at Council Offices on 16 January 2018

I would like to thank Havant Borough Council for inviting us to speak at this consultation forum.

We have a number of concerns the development encroaches in to the Countryside Gap between Emsworth and Westbourne. The Westbourne Neighbourhood Plan which has been to an enquiry and we are awaiting the Inspectors deliberations, he intimated support at the enquiry to our GAP policy which seeks to protect the gap between Westbourne and Emsworth of which this is part. Although we recognise we have no control as to what happens across the boundary in Hampshire we would hope that HBC would support the principle of a GAP in this area as it maintains the GAP between Emsworth and Westbourne so keeping their important individual characters and identities.

We feel the form of development will be very intrusive to the Rural Character of the gap because;

- the density of development right up to the boundary will give a hard-edged urban appearance.
- the existing boundary line of the property in Westbourne Avenue is made up of mature trees with long gardens and the new line will be hard edged to a roadway then houses close to the boundary with countryside.
- there are (as yet) no clear proposals for landscaping.
- any landscaping proposed will take many years to provide a softening effect but this is unlikely to be as attractive as the current boundary line.
- There is a road located on the outer edge of the development and with street lighting will be very intrusive especially with the South Downs National Park Close by who have a dark sky's policy

The 'rural' footpath is a strategic footpath link through open countryside between Emsworth and Westbourne.

These proposals therefore affect the main/strategic footpath between Westbourne and Emsworth which is very well used, we fear there will be irreparable damage to the peaceful Countryside setting which the users enjoy, a serious loss of amenity for both communities.

The path is used for recreational and leisure activities, it is used by many ramblers either setting off from Emsworth heading to the South Downs or simply to visit Westbourne or vis-versa to Emsworth. It is a very pleasant walk and obviously in a countryside setting. There are dog walkers, horse riders, those going shopping into Emsworth.

We don't know when the wildlife survey was undertaken but would disagree with its findings there are many animals that use this area as a wildlife corridor, especially so when considering the numerous watercourses which provide fresh water.

We are not happy with the impact of the development on the footpath because;

1. It pushes the footpath into the flood zone 3 and will make it very difficult to use in winter or even wet weather in summer. Any treatment would raise the level of the footpath causing retention of water toward the development and make the landscaping even more impractical. [SEP]
2. The footpath will be close up against the edge of the development giving it an urban not rural nature and as such its character will be changed/damaged permanently. Landscaping would be of little consequence in disguising the Urban nature of the development. [SEP]

The strategic GAP between Emsworth and Westbourne would be seriously diminished.

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Considering the area of the Flood Zone, mainly Zone 3, we note the Road around the edge is on that Zone therefore run off from the Road will exacerbate flooding in the area will the road flood? We have concerns in regard to the SUDS most new developments have swale ponds which on this ground would be unsuitable due to groundwater levels.

The Ems is a clean chalk stream coming off the South Downs recently a Salmon Parr was found in the river, the furthest East on the South Coast such a fish has been found, any pollution from the development or off the roads is likely to have a catastrophic effect on the ecology of the River.

Concerns arising on the evening

As the evening progressed and the Hampshire Homes Representatives made their comments it became apparent there are probably even more concerns that Westbourne would likely have including;

SUDS

1. The question was posed about where the SUDS were to be located [SEP] Answer; in the medium below the roads leading off the spine road. [SEP]
2. Question from a Councillor. Will the roads be adopted? [SEP] Answer; They will be built to adoptable standards but remain Private. [SEP]

Who then is responsible for maintenance of the SUDS when it clogs up which it inevitably will from Oil/dirt/salts etc.

When it clogs up, the water will divert straight into run off to the narrow gap/field before the stream leading to the river with the unintended and damaging consequences to the River and its ecology as well as the ecology of the existing small green field in the flood Zone being left.

Landscaping

1. The landscaper on one hand said there would be shrubs and planting to screen the development. [SEP]

2. However, when asked about what they would do to plan out anti-social Behaviour by a HBC Councillor, her response was most of the houses face out onto the area of the footpath so would be in view and so deter anti-social Behaviour. [SEP] If the houses can see out onto this area then logically from the footpath you can see the houses, which confirms the point that the Rural Idle it currently is becomes an Urbanised area, seriously detracting from the Amenity enjoyed by so many. [SEP]

Road/Parking

I observed that on the spine road serving the development (In the Flood Zone 3) there are a number of laybys where cars will park---this further contributing to the Urban nature of the development, no doubt the areas between these laybys would eventually be covered with additional parking on the verge adjacent to the field. The number of cars per household have been consistently under-estimated by highway authorities. Again, spoiling the 'Countryside' feel experienced by those currently and potentially using the Strategic Footpath in the future. Why walk through an 'Urban area', might as well get in a car to drive an urban area to the shops instead-----this does nothing to encourage a healthy living lifestyle.