



Westbourne
Parish Council

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20 August 2018

Planning Service
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

By e-mail to planning.development@havant.gov.uk

Dear Sirs

APP/18/00672: Erection of 46 no. 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. Land off Westwood Close, Emsworth.

Westbourne Parish Council strongly objects to the above named planning application.

The Parish Council's objection to the proposed development has already been provided at a Development Consultation Forum at Havant Borough Council in January 2018 where it was invited to make a representation, as well as in its response to Havant Borough Council's Draft Local Plan Consultation in February 2018. Although some modifications have been made to the development proposal since that time, the Parish Council considers that these minor changes do not in any way overcome the objections it has previously made to both the strategic principles and to the details of the scheme. A copy of these objections is included.

As a Parish located within West Sussex, but immediately adjacent to the county boundary with Hampshire and Havant Borough, Westbourne is directly affected by the proposed development.

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.

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 has recommended favourable outcomes 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 this planning application.

The Neighbourhood Plan contains local distinctiveness and biodiversity policies 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 given careful consideration to the evidence base that the Borough Council prepared to support Havant's 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. The proposed site (H10) is 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 not permit development at this site as it is 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 objection to the planning application which is set out below:

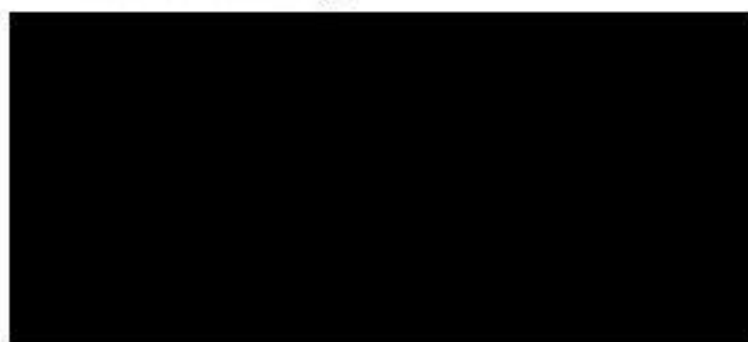
- The Parish Council considers that the Borough Council should not take any decision on this site until the strategic revision of flood risk, which it is understood is currently being undertaken by the Environment Agency, is completed. The site and adjoining land within the Ems Valley are affected by flooding and drainage issues and the current assessment of flood risk is likely to worsen, taking into account the implications of climate change, widely forecast to increase flood risk in locations like this.
- It would reduce and erode the local gap between Emsworth and Westbourne.
- The appearance of the development would create a hard urban edge that strongly damages the rural character of the countryside gap. The development would be far too dense in comparison to the properties on the adjacent roads. The hard edge - that can be seen in the artist impression provided by the developer – would destroy the tranquil walk on the historic border path, where the long gardens of properties on Westbourne Avenue and surrounding roads soften the urban area.
- The position of the road with street lighting at the edge of the development would further add to this unwelcome urban appearance.
- The strategic footpath would 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 would lead to long-term maintenance problems and potential failure with subsequent increased flooding and run off into the River Ems.
- The development would damage wildlife and the surveys already undertaken are considered to be insufficient and unreliable. The area is home to four species of bat, two of which are endangered, and which feed above the hedgerows that would be removed. There would be a risk of polluting the River Ems which is home to many species, including water voles and salmon. In one of the environmental reports, it even suggests removal of habitat for these and other species to reduce the possibility of them entering the site, something the NPPF discourages and actually looks for a positive environmental benefit.
- The development includes 116 car parking spaces and would increase the traffic in an already busy and congested area.
- The local community would lose one of the few remaining open field country walks in Emsworth. It is a very popular area for dog walkers, cyclists, joggers, ramblers and families.

The Parish Council would like to draw to the attention of the Borough Council, the issues related to infrastructure. Any development of the type proposed would affect Westbourne Village Centre in the event that any permission is granted. Increased traffic through the village and increased parking from future residents using the Village service would be inevitable. The Parish Council would strongly argue that any Community Infrastructure Levy that may be secured in relation to the grant of planning permission at this site should be proportionately allocated to the Parish Council to contribute to its Village Square Improvement Scheme.

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 proposed planning application.

Yours faithfully



Richard Hitchcock
Chairman of Westbourne Parish Council