



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

15th August 2018

Dear Mrs. Haywood,

Town and Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2012

Re: Proposed 46 dwellings with associated parking, landscaping and surface water drainage, on land accessed off Westwood Close, Emsworth PO10 .

LPA Ref: APP/18/00672 (FULL). Formally Registered 17.07.2018.

Letter of Objection

Principle of development

Following the Development Consultation Forum in January 2018, Public Exhibition in February 2018 and numerous pre-application exchanges between the applicant and the Council, the development proposal now faces the true test through the application process.

If the public consultation initiatives were intended to win favourable support for the development proposal, both the applicant and the Council should be left in no doubt that the net outcome from residents in the communities of Westbourne and Emsworth is unanimously one of unwavering objection.

The already controversial proposal is attended by a number of complicated aspects, commencing with the involvement of two separate administrative authorities. Of material relevance, the development fails to accord with paras 74, 76 and 77 of the Framework and conflicts with relevant policies in the Westbourne Neighbourhood Plan (which presently awaits the Inspector's report) and relevant policies in the Draft Emsworth Neighbourhood Plan.

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 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 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." See para. 74, from which it should be noted that additional requirements need to be met. As far as is known, no such assessment has been undertaken. Accordingly, it is emphasised that any proposed development within the Westbourne-Emsworth green space would strictly be contrary to relevant Framework policy. Such a needless and unjustifiable development proposal as submitted for planning permission, does not materially demonstrate that the development would provide wider sustainability benefits to either Westbourne or Emsworth communities.

The Draft Emsworth Neighbourhood Plan under Policy L5 states:- "Protecting green gaps between settlements will retain the landscape quality with benefits to wildlife, recreation and mental wellbeing." Protecting green gaps between settlements so as to preserve their separate identities, is a fundamental principle and a local authority's responsibility in proper planning terms. The existing gap between Westbourne and Emsworth is already extremely narrow in proportion to its overall length and compares unfavourably with other gaps in the Borough. If the proposed development were to proceed, the gap's width would be reduced to a maximum of 57 m; 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. In respect of coalescence avoidance aspirations, the loss of this existing precious open space would be contrary to relevant Framework policy and the development would also be at odds with the Westbourne Neighbourhood Plan and the Draft Emsworth Neighbourhood Plan.

A pertinently relevant question is why it is that the presently un-protected green space between Westbourne and Emsworth has not been included in the Local Plan 2036, for Local Green Space designation, for which there is a distinctly compelling case, being fully compliant with all requisite prescribed criteria and which essentially would also serve to consolidate what is an existing fragile and vulnerable gap; which are more just and justifiable planning policy options. Accordingly, this gap should be formally designated as Sussex Border Path Local Green Space in the Havant Borough Local Plan 2036; see paras/. 76 & 77 of the Framework.

Part of the proposed development site is now included as a housing allocation site in the Draft Havant Borough Local Plan 2036, which would provide residential development for approximately 35 dwellings; Policy H10 refers. Firstly, this is not consistent with the Council's Strategic Housing Land Availability Assessment (SHLAA) 2013, when the greenfield/open space between Westbourne and Emsworth 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." Significantly, 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 expressed in SHLAA (2013). Secondly, the prospective development site is currently not a confirmed strategic housing site.

Summarily, the application for the proposed development should not be determined until each of the foregoing issues of materially relevant importance have been resolved, towards the ultimate adoption of the Local Plan 2036.

The proposal

In Section 7 of the Framework, para. 56 states:- "The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people".

The development proposal exhibits a poor design quality which includes an elementary layout, with a succession of overly narrow culs-de-sac off the main access road, that most likely would cause difficulties for household refuse collections and problems for emergency vehicles. Refuse collection is already difficult to serve existing dwellings in Westwood Close by reason of its road width and alignment ; refuse collection operatives are instructed by management to walk no more than six paces to collect bins.

The proposal presents a grossly overdevelopment of the application site, resulting in a cramped, poor quality of development that fails to respond to local character and does not reflect the identity of local surroundings. In particular, small plot sizes with limited amenity space do not relate appropriately to existing amenity standards and plot sizes in the adjacent neighbourhood and wider area of Emsworth.

Added to that, the development would not be in a sustainable location, altogether contrary to the applicant's assertion.

Para. 64 of the Framework states;- "Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions."

Flood issues

The proposed development is presently located in Flood Zone 1 on the Environment Agency's (EA) Flood Map and is immediately adjacent to Flood Zone 3, an appropriate zone of high flood probability in an area of the greenfield/open space, identified as the River Ems floodplain. There would therefore be significant potential for increased flood risk to such a vulnerable area, resulting directly from the development.

During winter months, the margin of land between the river and the eastern boundary of the proposed development in particular, becomes an area of wetland in real terms. The development would also be located within an area that already has a confirmed history of drainage capacity issues.

The development should therefore be appropriately informed by the extant Strategic Flood Risk Assessment (SFRA).

Traffic increase and access difficulties

The Transport Statement's claim, when considering relevant highway issues, that the proposed development would not have a material impact on the local road network is absurd and fatuous. The development would inevitably generate a substantial increase of vehicular movement and associated on-street congested parking in adjoining roads and the wider area of Emsworth. The significant vehicular movement increase would also inevitably result in a severely detrimental impact on the quality of life presently enjoyed by residents in the neighbourhood.

The vehicular access arrangements, intended to serve the proposed development would be less than satisfactory, exacerbated by the horizontal alignment of Westwood Close. It is the case that passing private cars frequently find it necessary to cross over the footway in Westwood Close. This true circumstance does not account for larger delivery or service vehicles and private cars are getting larger.

Drainage issues

Surface water management and the provision of sustainable drainage systems are frequently contentious matters in many cases, especially in areas of potential risk of fluvial flooding. The successful initial installation of SuDs is key to the longer term performance of the system and is dependent to a large extent on a contractor's competence for the avoidance of performance defects, which can and does happen. Suds are essentially also dependent on regular monitoring and maintenance; there are therefore significant related concerns in this case as to how regular and vigilant servicing would be guaranteed for unadopted roads, as proposed.

Final comments

As part of the local traffic distribution network serving a built-up residential area, Westwood Close was designed to serve fourteen (14) dwellings. Its road width is approximately 5.5 m. with footways that measure approximately 1.8 m. Its horizontal alignment is characterised for virtually most of its relatively short length, by a low speed curve. As previously mentioned, private cars travelling in opposite directions cannot freely pass each other due to the restricted road width; one car is obliged to give way by mounting the footway. Commercial vehicles use half of the footway to park and the household refuse collection vehicle experiences difficulties entering and leaving the road. The foregoing observations clearly indicate that the road, as designed, already has its own regular difficulties for road users, residents and visitors. This raises the serious albeit late question as to whether the existing road and footway are at all really appropriate for the addition of vehicular and pedestrian traffic that would be generated from 46 new dwellings? Access to the development site for large emergency vehicles would likely to be especially difficult.

Part of the proposed development site is now included as a housing allocation site in the Draft Local Plan 2036, which could provide residential development for approximately 35 dwellings (Policy H.10 refers) This would be a relatively small contribution to the housing target beyond 2036 and as the Framework advocates, the supply of new houses can be best achieved through planning for large scale development.

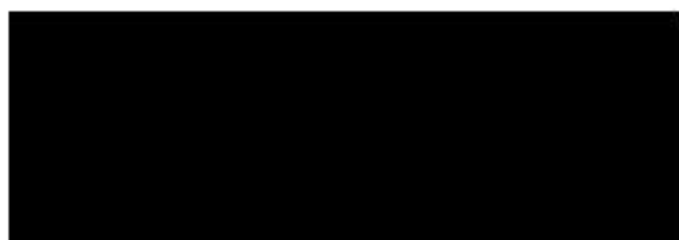
Since the adopted Local Plan Housing Statement (2016) towards the Draft Local Plan 2036, has identified sufficient sites that will deliver sustainable development, sufficient to address the Borough's housing need up to 2036, the proposed development is not necessarily essential. Havant Borough Council therefore has an opportunity to consider the development proposal objectively, from a wider perspective, relaxed and unencumbered by political pressure and taking into account, that the site is not in a sustainable location.

We strenuously object to the proposed development on materially relevant grounds expressed in this letter.

A number of the materially relevant key issues that outweigh the merits of the proposal require to be resolved before the application is determined.

We therefore request that the Council's decision on the application be deferred, pending the conclusion of the E.I.P. for the Local Plan 2036, towards its formal adoption. Notwithstanding the Framework's presumption in favour of sustainable development.

Yours sincerely

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