

Dear Daphney

I write with reference to planning application APP/18/00672 – “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”. I wish to object to the proposed development and planning application.

As outlined in my comments during the DCF process, I do not believe that the proposition by the developer adequately addresses the site’s constraints and I disagree that the proposed plans will deliver a sustainable development.

I outline my main concerns as follows:

1. **The size of the plot** – the Developer has indicated in their Design and Access statement that the plot measures 2.22ha. This is now the fourth measurement that has been given. The quoted measurements have been as follows:

- a) 0.97ha – Havant Draft Local Plan
- b) 1.48 ha Hampshire Homes’ Briefing Note for their DCF
- c) 1.78 ha Hampshire Homes’ Presentation at their DCF

I have measured their Architect’s scale plans (Site Layout Plan Ref: 17017A-PL-02) which shows the developed area including parking to measure 1.32ha.

I appreciate that arguing over the size of the plot is not necessarily a reason to deny planning, but it has a bearing on my comments below.

2. **Flood Risk Area** – the Design and Access statement under 4.3 states that the development is contained within Flood Zone 1 (a low risk of flooding). It neglects to mention that the site borders flood zone 3 (high probability of flooding) ([Gov.uk](https://www.gov.uk) website).

The Developer commissioned a “site specific” Flood Risk Assessment “in support of the application”. Within the assessment it concludes that there would be no net increase of flood risk to the River Ems.

However, from what I can read, this is based on the “historic Greenfield run off rate” which is not a site specific measurement but an “estimation for small catchments” based on a report from 1994.

Furthermore, with the report being “site specific” that would suggest that the wider impact of the proposed scheme has not been considered.

Lastly, the groundwater monitoring report concludes that “additional long term groundwater monitoring should be undertaken”.

3. **Density of the Proposed Scheme** – given my comments above, the developable area of the site extends to roughly 1.32 ha as this is the amount of land within Flood Zone 1. At 46 dwellings this equates to 35 dwellings per hectare – above that recommended within the Local Plan and out of keeping with the surrounding area.

The developer has sought to show that the site has a low density by including the whole of the site (including those parts in Flood Zones 2 and 3) in their equation to arrive at a density

of 20.7 dph.

It appears the developer is picking and choosing when to consider the parts of the site within Flood Zones 2 and 3. Why is it acceptable to include these areas of the site when calculating density, but not when allowing for Flood Risk?

4. Environment Agency Remodelling of the River Ems – within Appendix E of the Flood Risk Assessment there is correspondence between the developer's agent and the Environment Agency regarding the River Ems.

An email from Rogers Cory to the Environment Agency dated 11 May 2018 states that “the EA feels that the area currently shown as Flood Zone 1 (which is where we are proposing to develop) will become Flood Zone 2 and 3 as a result of the updated modelling exercise”.

The Environment Agency respond by saying that the “model has been built and the hydrology is being reviewed”. They state that they will not meet with Rogers Corey as they have made their position clear.

Rogers Cory respond on 31 May by asking for “a response on the best available information (i.e. current flood maps with fluvial flood levels) at the time of consultation”. This is due to their Client's timescales and no other reasoning is offered.

The Environment Agency respond by saying that the remodelling work is unlikely to be completed until after Christmas but that they would be able to provide a comment using the best information available.

It would be irresponsible, and arguably negligent, for an irreversible planning consent to be granted with this knowledge available. Why not wait 4 months for the outcome of the modelling?

The River Ems' flooding problems are frequent and well documented. The river is also of significant ecological importance to Brook Meadow Nature Reserve and Chichester Harbour.

I cannot see that there is any reason for this decision to be made hastily other than the “client's timescales”.

Furthermore, the only EA response that has been provided (Flood Risk Assessment 2 document) is a letter from 21 April 2017 – over a year before the correspondence above. Where is the additional advice from the Environment Agency?

5. Footpath – the Developer has made plans to move the existing footpath. Their planned reinstatement of a gate is welcomed.

However there is no additional information available on the design of the footpath. The rerouting of the path will move it into Flood Zone 3 which is likely to, at worst, render is unusable in the event of any flooding and at best make it more difficult to walk on in the winter months.

I would feel more comfortable if there was evidence of significant betterment to the footpath to offset the loss of the it from Flood Zone 1.

Has the developer undertaken any research or studies of who uses the footpath and how frequently? With this being the one ‘green’ link between Westbourne and Emsworth, I think its preservation and continued sustainable usage is imperative.

6. **Ecology** – the Ecological Appraisals show that there are a number of species that are potentially present on the site. Having walked along the footpath for a number of years myself I have seen an abundance of wildlife and I believe that the site would need a vast range of mitigative and enhancement measures to prove that is sustainable for wildlife.

7. **Lack of Detail** – there are a number of areas within the application that, in my view, lack the necessary amount of information for the development to be deemed sustainable and therefore approved.

The Design and Access statement talks about the 'potential' for incorporation of energy efficiency measures, without providing any detail on any such measures proposed for the scheme.

It also states that it "could" offer ecological benefits. Why have these benefits not been detailed and highlighted, given that the Developer is aware that there is a likely presence of reptiles, nesting birds, water voles and badgers?

Lastly it goes on to explain that Havant does not have a 5 year housing land supply but then states that it has a 4.9 year housing land supply. I find it hard to believe that the absence of 0.1 years of our supply justifies the Developer's claim that the "relevant policies for the supply of housing should not be considered up-to-date". In essence, they are trying to push the decision away from local planning policy thereby ignoring the agreed needs of the local populace.

8. **Sustainability** – the Developer continually states in their D&A statement that the development will be sustainable and relies upon "presumption in favour of sustainable development".

I accept that the development will bring economic and social benefits to the Borough in the form of affordable housing (presuming it is not negotiated away through viability) and additional income.

But to claim that the site is 'sustainable' in the true sense of the word and its definition of the NPPF is questionable. So far as I can read, the development will have significant and irreversible negative effects on flood risk, ecological and travel links to Westbourne and Emsworth.

Had the developer dealt with these issues prior to the application, they would have suggested:

- Genuine improvement for the footpath, acknowledging its repositioning into a Flood Zone is not sustainable;
- A raft of measures to mitigate impacts on wildlife and to improve their prosperity on the site in the long term;
- Have waited for the Environment Agency to complete their remodelling exercise on the River Ems and given it's findings due consideration within their plans.

However, within the developer's application we get no details on any of the above. Instead we get answers from specialists that appear rushed, presumably to avoid changes to matters such as the River Ems remodelling and the revised NPPF.

In summary I do not believe that this development is sustainable and it would not currently

deliver positive growth to the area. It would not be a change for the better as made clear in the NPPF. The application feels rushed and not representative of what could be achieved by the considered and reasoned development of a greenfield site.

