



Emsworth Residents' Association

28th August 2016

Dear Sir/Madam

PLANNING APPLICATION APP/16/00774 – 192 DWELLINGS ON LAND WEST OF SELANGOR AVENUE

We consider that this site is outside the existing settlement boundaries as defined in the current Local Plan policies map where development is limited by policies to small scale householder development, meets an overriding public need for (community or recreation use that cannot be accommodated elsewhere in the borough). The Government Inspector who conducted the Examination in Public only 2 years ago added the words in brackets to ensure that Policy AL2 is clear and effective. These changes were subsequently adopted by Havant Borough Council. We already have a Local Plan and a 5 year housing land supply. This Plan was declared “Sound” by the same government Inspector.

We do not understand why these matters need to be so expedient, giving residents little time to respond to this application and another coming forward for Southleigh Park House in the same time frame as the Draft Local Plan in the middle of summer holidays. In spite of our efforts to publicise these matters many residents are not aware of these proposals at all. The numbers attending the exhibition in Emsworth was far less than those who participated in the last exhibition for the existing Local Plan. The Council’s heavy reliance on social media has excluded many people from being involved.

Although the Council says a number of urban extension sites could come forward ahead of their formal allocation in a local plan to 2036 the local plan Housing Statement is not part of the statutory development plan at this stage. It ought not to be used for development management decisions ahead of the adoption of a revised local plan. Therefore the restriction to community uses still obtains at this time and should continue to do so until the Secretary of State agrees the adoption of a revised local plan, particularly as the council was firm in its refusal to include this site in the Housing Allocations document for the existing Local Plan two years ago. Sue Turner, the government inspector also agreed to exclude this site in spite of Barratt’s planning consultant’s representations put forward at the Plans Examination in Public at that time. Therefore the prior approval of development outside urban areas is contrary to current adopted policies at this time. It is also contrary to the Council’s stated policy not to allow piecemeal developments.

The Minister of State for Housing and Planning has also made it clear “that the outcome of Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. It does not immediately or in itself invalidate numbers in existing Local Plans”.

The PUSH’s (Partnership for Urban South Hampshire) non statutory position statement June 2016 also warned about the narrowing countryside gaps which are key to maintaining their

identity and preventing future urban sprawl. The development of this site will completely close the gap between Emsworth and Havant to the north resulting in their coalescence.

On the subject of PUSH we are not convinced that their figures are sufficiently robust and feel you ought to be using the DCLG figures instead

The Kirkham Study into Landscape Sensitivity and Capacity carried out on behalf of the Council in 2015 concluded "that this corridor had been taken into account for its impact on land parcels but had not been considered in its own right as a possible housing site". They also made the point that "the parcel is in the undeveloped gap separating Emsworth and Havant". The capacity to accept change in this area is also low.

We understand that the applicant's do not consider this site wide enough to represent a gap even though it has always been described as one. They and the Council should note that the draft proposal to take a road northward through the more western Strategic Site between Havant and Emsworth is intended to be tree lined and be described as a gap separating the two settlements. This argument is therefore at odds with the Council's view on size and ignores the fact that this site is on the edge of the area separating the two settlements.

Transport

We have not seen any reference to traffic lights in the Transport and Access proposals or a travel plan, but would draw your attention to the following observations

6.26 Less than 1 vehicle turning right every two minutes is considered to be a vast underestimation of vehicles wanting to turn right if 70% of vehicles exiting the site want to turn right during peak times. Vehicle spaces for 360 are planned. These figures do not therefore add up.

9.6 Turning Count Surveys - These were sited at Emsworth roundabout, the A27 slip road roundabout, the Havant Road/A27/Church Lane roundabout, the Southleigh Road/Emsworth Road junction and Victoria Road/North Street junction. Although these sites are in the vicinity of the proposed development site they do not directly affect the junction. It is considered that all of these sites are too far removed from the area in question.

A more realistic option to survey would have been Havant Road junctions during peak times with Selangor Avenue, Nore Farm Avenue, Park Crescent, Barn Close and Record Road, which are closer and would give a far better waiting time assessment. One car every 2 minutes wanting to turn right onto Havant Road is just not a viable assessment. The problem being that any gaps that are created in the traffic flow going west along Havant Road are filled by vehicles turning onto Havant Road and that is way before reaching Selangor Avenue! A similar situation is when someone want to turn right out of Barn Close or Beach Road going east during the peak time. There are very few breaks in the traffic flow.

7.1 Internal Road Layout. 'Sufficient space for a car and large vehicle to pass'. There are estimated to be spaces for 360 vehicles to park including 20 visitors, some along the roads. That is considered to be an underestimation and that always assumes everyone parks sensibly!

10.21. The roundabout at Church Lane/Havant Road is already operating at over capacity and this will only get worse. Queues already back up from this roundabout to Barn Close and Beach Road during peak time without additional traffic being included.

To add 150=200 cars a day to this already congested area would increase noise and other pollution. It will also raise potentially serious safety issues too. Selangor Avenue is often used

as a cut through road when Havant Road is congested the proposed limited onsite parking is likely to spill over into Selangor Avenue.

Should this application be recommended for approval we consider traffic lights at the access/exit of the site are essential.

Gas Pipeline

Gas Pipeline in the vicinity of the proposed development is a Major Accident Hazard Pipeline which is legally protected by a Deed of Servitude which restricts building and other works within the servitude area. Southern Gas say that no mechanical excavations should take place above or near the gas main and that the applicants should confirm the exact position of the main and other pipes using hand dug trial holes. They also stress that both direct and consequential damage to gas plant can be dangerous both for employees and the general public. We are not sure how the bore holes were made for the applicant's contamination study. The Borough Council have a duty of care for public safety, but have made no reference to the way in which their officers will monitor actions around this Hazard Pipeline.

We have seen that on 12th August, Southern Gas Network (SGN) objected to this planning application because the developer has designed the properties over the pipeline and within the easement area, and, the easement area cannot be within individual private property's land. SGN have invited the developer to redesign the site and to discuss their options.

Density Biodiversity and Character of adjacent dwellings

The proposed density, height, mass and scale of this development is also considered inappropriate. These do not have regard to the existing settlement and are likely to have unacceptable adverse effects on the landscape, character of the existing dwellings in Selangor Avenue which are all bungalows. Overlooking and possible loss of light should be examined.

The local authority should not home in on housing numbers at any cost either. Biodiversity via agriculture and wildlife which enhances our village is also important for residents quality of life. They will lose their green space in front of the A27.

Foul water disposal

We have seen from the planning application that the intention of the developers is to construct a small pumping station for foul water on the southern edge of the site. The intention is that this in turn will pump foul water to a connection to Southern Water's main sewerage pipe under the Havant Road.

However, to date we have seen no confirmation or even comment from Southern Water to this proposal. We raised questions on this aspect, surface water drainage and on Highway responses at the pre-application consultation, but have not received up to date information on any of these matters. Has a flood risk assessment been carried out?

It is of course of paramount importance that any new development can safely dispose of its foul water. In the last three years, Southern Water have warned all new proposed developments that they are close to capacity on their existing networks. Any delay in comments from them can only lead to concerns that the foul water disposal from this proposed development is too much for the existing network to cope with.

Surface drainage / flooding

Some properties in Selangor Avenue adjacent to the proposed site have flooded in recent years. The cause of the flooding was run-off from this particular site, then undeveloped. More recently, flood mitigation measures have been introduced north of the A27, designed to hold back excess water from this site, as well as other water courses.

However, these measures have not been tested with heavy winter rain.

The applicants state that their proposed surface drainage will mimic natural drainage as much

as possible, through porous ground level coverage. It is also proposed that three attenuation ponds will be created to hold any excess surface water, although the applicants seem confident that they will only fill in extreme circumstances.

We are concerned that will the flood prevention measures, existing and proposed, adequately cope with possible flooding on a fully developed site. This is a site with high water table; in the Ground Condition Report it was noted that boreholes have collapsed due to high water table.

For all the reasons given above we feel this application is contrary to the existing Local Plan, the serious views expressed by HBC and Government Inspector only 2 years ago. Nothing has changed in that time except the increase in dwelling numbers from 154 to 192.

It is at the very least premature until a revised Local Plan has been accepted and should therefore be refused.

Yours faithfully

Jo Dyer Chairman

PS We would like to be informed how much of this response will be conveyed to elected planning decision makers.

Treetops

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