TECHNICAL PLANNING REPRESENTATION

Outline Planning Application APP/26/00324

Southleigh Strategic Development

Submitted by [redacted]
Resident of Emsworth

Summary

This representation supplements my initial objection to the above planning application.

I recognise both the national and local need for additional housing and acknowledge that Havant Borough Council currently faces a significant housing land supply shortfall. I also recognise that Southleigh has been identified for a number of years as a potential strategic growth location and now forms part of the emerging Local Plan.

However, these factors do not remove the statutory requirement for the Council to determine whether this particular application represents sustainable development when considered against the Development Plan as a whole and all other material considerations.

The Planning Statement accompanying the application concludes that the proposal represents sustainable development and that planning permission should therefore be granted.

This representation respectfully submits that, whilst the application contains many positive elements, the evidence currently before the Council does not yet demonstrate with sufficient certainty that all significant planning issues have been satisfactorily resolved.

In particular, I invite the Council to explain within the Officer's Report how it has reached its conclusions in relation to the following ten matters.

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1. Reliance on Future Mitigation

The Planning Statement repeatedly relies upon future detailed design, Reserved Matters applications, Section 106 obligations, landscaping, drainage strategies, transport improvements and ecological management to demonstrate the acceptability of the proposal.

Whilst this is common for outline applications, the Council must be satisfied that there is sufficient certainty at this stage that these measures will actually deliver the environmental and community outcomes relied upon.

Question for the Council

Has sufficient evidence been provided at outline stage to conclude that these mitigation measures are capable of being delivered with the certainty required to justify granting planning permission?

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2. Landscape Character

The applicant's own landscape work identifies the northern part of the site as one of the least altered landscape character areas within the Borough and identifies conservation of local character as the landscape strategy. At the same time, the proposal introduces approximately 1,800 dwellings together with a school, local centre and associated infrastructure.

Although mitigation planting is proposed, landscape mitigation does not remove the permanent urbanisation of presently open countryside.

Question for the Council

How has the Council concluded that the long-term change in landscape character remains acceptable having regard to the applicant's own assessment?

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3. Settlement Identity

The countryside between Denvilles and Emsworth contributes significantly to the identity of both communities.

Although green corridors and landscape buffers are proposed, the development would fundamentally change the existing relationship between the settlements.

Question for the Council

How has the Council concluded that the proposal preserves the separate identity and setting of Emsworth, consistent with the objectives of the adopted Emsworth Neighbourhood Plan?

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4. Infrastructure Delivery

The Planning Statement identifies numerous infrastructure benefits including a primary school, local centre, mobility hub, community facilities and green infrastructure. Much of this infrastructure will however be secured through future agreements and phased delivery.

Experience elsewhere demonstrates that housing occupation can occur significantly in advance of supporting infrastructure.

Question for the Council

How has the Council satisfied itself that healthcare, education, highways and community infrastructure will be delivered in step with occupation of the development rather than after significant population growth has already occurred?

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5. Transport and Sustainable Movement

The proposal relies heavily upon walking, cycling and public transport to reduce private car use.

These objectives are welcomed.

However, their effectiveness depends upon future behavioural change and delivery of associated infrastructure.

Question for the Council

What evidence demonstrates that the assumptions regarding modal shift and reduced private vehicle use are realistic for a development of this scale?

6. Flood Risk and Climate Resilience

The application proposes sustainable drainage systems together with attenuation measures and climate change allowances.

However, much of the detailed design remains reserved for future approval.

Question for the Council

Has sufficient evidence been provided at outline stage to conclude that flood risk, long-term drainage maintenance and climate resilience have been satisfactorily resolved?

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7. Compliance with the Emsworth Neighbourhood Plan

The Emsworth Neighbourhood Plan forms part of the statutory Development Plan.

Whilst the Planning Statement concludes that the proposal complies with planning policy, it is not clear how the Council has balanced the scale of the proposal against the Plan's objectives relating to settlement identity, landscape, design quality and infrastructure.

Question for the Council

Can the Officer's Report explain specifically how the proposal complies with the relevant policies and objectives of the adopted Emsworth Neighbourhood Plan?

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8. Cumulative Impact

This proposal should not be considered in isolation.

The cumulative impacts arising from planned development within the wider Havant and Emsworth area should also be assessed.

These include:

- highway capacity;
- healthcare;
- schools;
- utilities;
- environmental effects;
- recreational pressures.

Question for the Council

How have cumulative impacts been assessed, and what evidence demonstrates that the combined effects remain acceptable?

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9. Planning Balance

The Planning Statement places significant emphasis upon the Borough's housing land supply position and the benefits arising from delivery of new homes.

Housing need is undoubtedly an important material consideration.

However, it should not automatically outweigh unresolved environmental or infrastructure concerns.

Question for the Council

How has the Council balanced the acknowledged housing benefits against the permanent effects upon landscape character, settlement identity and local infrastructure?

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10. Outline Planning Permission

This application seeks outline planning permission with many detailed matters reserved.

Outline permission is entirely appropriate where sufficient certainty exists regarding the principle of development.

However, where significant aspects of acceptability depend upon future approvals, the Council should be satisfied that enough evidence exists now to justify granting permission.

Question for the Council

Has sufficient information been submitted to conclude that the proposal is acceptable in principle, or do important matters remain insufficiently resolved?