

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 06 June 2019 21:01  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood plan

Dear Sir/ Madam,

I wanted to say we support the submission version April 2019 of the Emsworth Neighbourhood Plan, and urge the council to support it.

It is pleasing to see the recognition of the importance of designated local green spaces in Policy C5, in particular sites 10 and 11, the Horse Field and Emsworth Valley Corridor. The well being of people and promoting good mental health is so important now and for future generations.

The initiatives to support the vision to enable Emsworth to flourish and ambitious targets for affordable housing are very welcome.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 01 June 2019 09:01  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan - Objection  
**Attachments:** Plan A.pdf

Dear Sir / Madam

I have recently been made aware of the Emsworth Neighbourhood Plan and wish to make an **objection** to part of the proposals.

As an Emsworth resident [REDACTED] I am generally pleased to see such a plan however

I must point out an error in the submitted document.

I am a Land owner [REDACTED] and would like any reference to our Land being Part of Brook Meadow **removed** as it does not form part of this area.

It would appear on **page 34** our land has been included in the **Brook Meadow Nature Reserve (Site) referenced to Policy C5**, when clearly it is not.

As I have not been consulted on this and the Forum have not asked our permission, I must insist that the diagram be changed to remove our land from the Nature Reserve (see attached diagram - **Plan A**).

I would also appreciate it if any other reference to our Land be removed from the Forum document.

Please confirm this has been actioned before any decision is enforced.

I look forward to hearing from you at your nearest convenient.

Your sincerely,

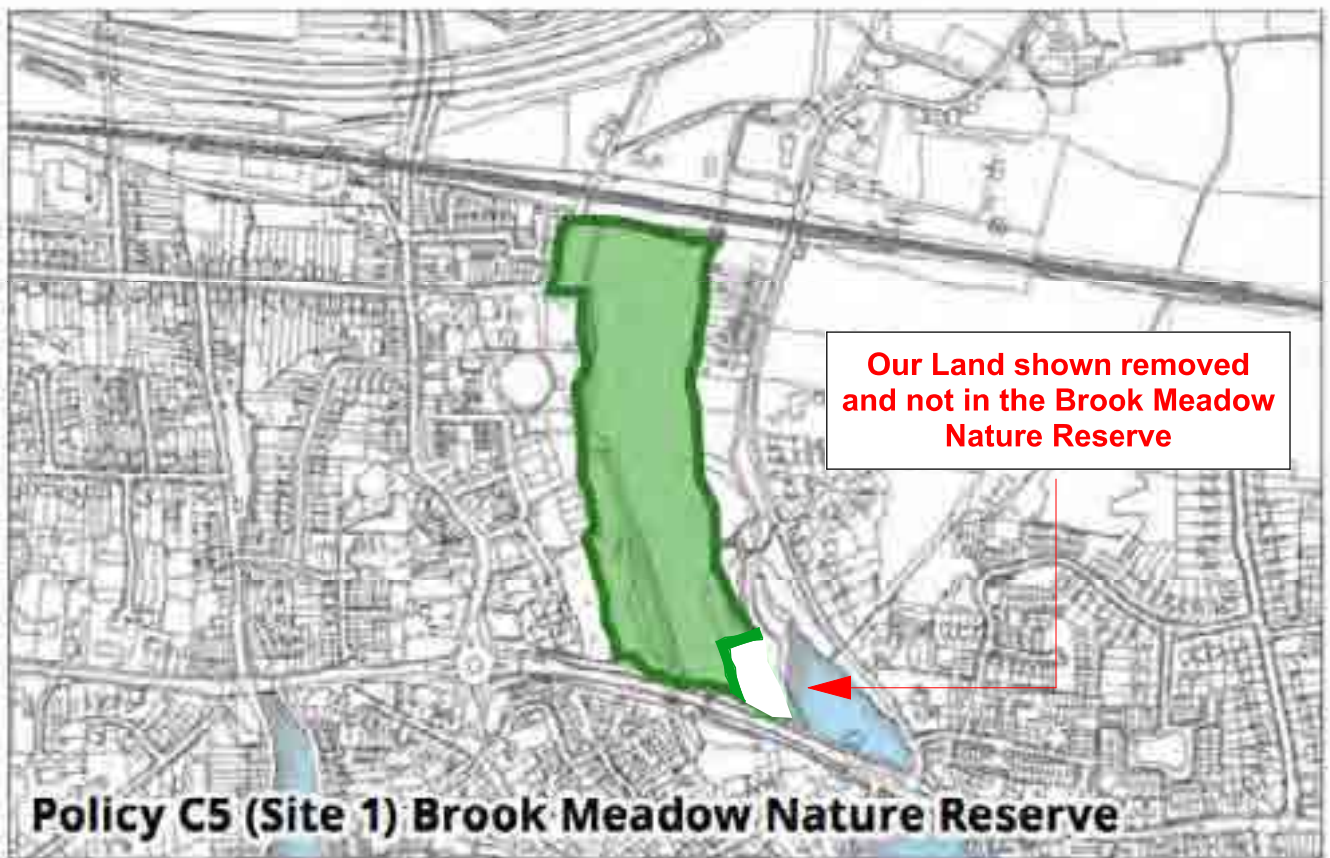
[REDACTED]

[REDACTED]

Current Plan for Brook Meadow



Revised Plan to remove our area of Land as it is not part of Brook Meadow



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 May 2019 11:15  
**To:** Planning Policy and Urban Design  
**Subject:** Neighbourhood Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

As a resident living in Emsworth [REDACTED] I would like to add my support to what I believe is a very worthy Neighbourhood Plan produced by the Emsworth Forum. This is a much needed document highlighting the concerns and wishes of the local community particularly in the area of protecting the environment and the wellbeing of all those living in Emsworth. Hopefully those elected to protect the interests of our local community will see this as an acceptable Plan to sit alongside the recently produced Havant Local Plan. The need to ensure that there are adequate facilities for those living in the area and the availability of protected green spaces is a fundamental requirement for the future wellbeing of young and old. I very much hope that the Plan will be accepted.

[REDACTED]



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 23 May 2019 22:18  
**To:** Planning Policy and Urban Design  
**Cc:** [REDACTED]

**Subject:** Emsworth Borough Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir

We are concerned to read that Emsworth Slipper Sailing Club has been incorrectly categorised in the Emsworth Borough Plan:

*The inclusion of "Slipper Sailing Club" (properly "Emsworth Slipper Sailing Club") and the adjoining Malthouse as being primarily for "public and community use" (per policy H3 b)) is incorrect. A private members' club does not fall into use class D1 and the Malthouse is partly used, in accordance with existing consents, for commercial purposes. The inclusion of these buildings in this policy is inaccurate and should be removed.*

Please ensure that this error is corrected and confirm in writing that this has been done.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 May 2019 13:23  
**To:** Planning Policy and Urban Design  
**Subject:** RE: Consultation on Emsworth Neighbourhood Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear [REDACTED]

Thank you for consulting us on the above Neighbourhood Plan.

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest. Having reviewed the plan and due to the fact that no site allocations are proposed we have no detailed comments to make at this stage. However together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

[http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT\\_6524\\_7da381.pdf](http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf)

We will continue to work with Havant Borough Council to influence policy relating to issues within our remit through the Local Plan review.

Kind regards  
[REDACTED]

[REDACTED]

[REDACTED]

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**From:** Planning Policy and Urban Design [mailto:planning.design@havant.gov.uk]  
**Sent:** 25 April 2019 15:10  
**Subject:** Consultation on Emsworth Neighbourhood Plan

Dear consultee,

This email advises that the Emsworth Neighbourhood Plan has been submitted to Havant Borough Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

The Emsworth Neighbourhood Plan has been prepared by the [Emsworth Neighbourhood Forum](#) on behalf of those who live and work in Emsworth. The plan sets out a vision for the area through to 2036 and sets out policies to guide the future of the area.

In accordance with Regulation 16, the Borough Council now **invites comments on the plan during a six-week period from 26 April 2019 to 7 June 2019.**

[Redacted]

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**From:** [Redacted]  
**Sent:** 25 May 2019 12:07  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan

Strongly support any protection given to Chichester Harbour, Nore Barn Woods and the Horse Field under policy C5.

[Redacted]

**From:** [REDACTED]  
**Sent:** 07 June 2019 15:34  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan, April 2019

There is much to be applauded in the Emsworth Neighbourhood Plan. I am an Emsworth resident and raise here the following points for consideration.

### The Character of Emsworth

Why do people who live in Emsworth like living in Emsworth? Why would people wish to move to live in Emsworth? Why do people seem to like visiting Emsworth?

In describing the fundamental characteristic qualities of the centre of Emsworth, people might use one or more of the following adjectives...

- Peaceful
- Charming
- Compact
- Relaxing
- Friendly
- Welcoming

...and others in a similar vein.

They may not wish it to change in any fundamental way. They may not wish it to become “vibrant” – more hustle and bustle, quivering with metropolitan excitement.

And yet, this plan appears to believe they do: the word “vibrant” is employed as a desirable characteristic as a goal to be attained no less than eleven times throughout the report.

### Policy L1 and Policy W4 Housing Development and Tourism

It is disappointing that the report does not include one significant feature of housing in Emsworth. There appears to be no policy on...

- Second homes
- Holiday Homes
- Holiday Lets
- AirNB Lets

Given some other objectives of the Plan, there is little to be gained in constructing the required housing allocation on diminishing greenfield sites if a good proportion of the builds will not be occupied by residents’ families. It can be argued that already there are too many dwellings serving the above categories. This may have some positive aspects (e.g. tourism), but overall it is not good for the town to have so many properties that are either unoccupied or intermittently occupied by people that are not permanently involved within the local cohesive community. Such usage should not be included in the required “housing needs”. Councils may not have any policy on housing use but this does not mean that they should not. If they can specify usage as “affordable housing” they can specify no usage as holiday lets.

#### Policy C4

Currently, Emsworth Victoria Cottage Hospital Garden is not an "existing community space". It is enclosed and locked.

#### Policy C5

An additional space – consider the corridor with footpath between Nore Barn Wood (W) and the A259.

#### Policies M1/M2/M3 North/South Divide

The physical and psychological barrier between north and south Emsworth is not the A259, which can be crossed without much difficulty at many points along its length.

No, the main barrier is the combined rail track and A27 dual carriageway road. These can be crossed at only one point by motor vehicle and at very few points on foot or by bicycle.

Access beneath the rail bridge for the B2148, North Street to Horndean Road, is particularly restrictive. The carriageway is only just able to accommodate modern width vehicles in both directions. There is no room for cyclists to safely use the road here. For pedestrians, there is but a single footway, unless the tunnel, which is railway property, is regarded as a legitimate route. The single footway is narrow, down to about 84cm, being of insufficient width to allow pedestrians to pass one-another and only just wide enough for a wheelchair.

This is the "elephant in the room"! Solving this problem for the people of Emsworth must take priority over any other scheme such as creating a Poynton junction.

The existing Emsworth roundabout works very well for cars. There is a well-balanced flow from all directions. Pedestrians can, and do, cross the roads fairly easily using the islands. I have helped a blind person cross here with no difficulty. Traffic often stops to allow pedestrians to cross, although the addition of simple zebra crossings here would undoubtedly help. My blind friend would not dare to attempt to cross a Poynton junction. Blind people would no doubt continue to use the crossing with lights, where there is an audible signal that traffic has stopped.

#### Strategic Landscapes - Wildlife Corridors

As Emsworth lies on the coast, the important wildlife corridors to preserve are aligned north/south, such as the Emsworth (Ems?) Valley corridor.

Sadly, this report has come too late to save our broadest wildlife corridor, running from the shore around Conigar Point and Nore Barn Woods northwards to Havant Thicket. This is now all but blocked by the new high-density housing development at "Saxon Corner", contrary to Policy L5.

The report should identify all those wildlife corridors that are to be retained at all costs.

Kind regards



[REDACTED]

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**From:** Planning Policy and Urban Design  
**Sent:** 06 June 2019 09:01  
**To:** [REDACTED]  
**Subject:** FW: Emsworth Neighbourhood Plan Regulation 16 Consultation  
**Attachments:** Emsworth Reg 16.pdf

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**From:** [REDACTED]  
**Sent:** 06 June 2019 08:18  
**To:** Planning Policy and Urban Design <planning.design@havant.gov.uk>  
**Subject:** Emsworth Neighbourhood Plan Regulation 16 Consultation

Dear Sir/Madam,

Please find attached representations to the above consultation submitted by Gladman. I would appreciate if you could confirm receipt of this submission by responding to this email.

Kind regards,  
[REDACTED]



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Congleton Business Park  
Congleton, Cheshire  
CW12 1LB

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F: 01260 288801

[www.gladman.co.uk](http://www.gladman.co.uk)

Planning Policy,  
Havant Borough Council,  
Civic Centre Road,  
Havant,  
PO9 2AX.

By email only to: [policy.design@havant.gov.uk](mailto:policy.design@havant.gov.uk)

Dear Sir/Madam,

This letter provides Gladman's representations in response to the draft version of the Emsworth Neighbourhood Plan (ENP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in neighbourhood planning, having been involved in the process during the preparation of numerous plans across the country, it is from this experience that these representations are prepared.

### **Legal Requirements**

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the ENP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*
- (g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).*

### **National Planning Policy Framework and Guidance**

On the 24<sup>th</sup> July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper. This version was itself superseded on the 19th February 2019, with the latest version, largely only making alterations to the Government's approach for the Appropriate Assessment as set out in Paragraph 177, clarification to footnote 37 and amendments to the definition of 'deliverable' in Annex 2.

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to



meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account of and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

### **Relationship to Local Plan**

To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The adopted development plan relevant to the preparation of the Emsworth Neighbourhood Plan area, and the development plan which the ENP will be tested against is the Havant Borough Core Strategy and Havant Borough Local Plan (Allocations), adopted in March 2011 and July 2014 respectively. The Core Strategy was adopted prior to the introduction of the National Planning Policy Framework and it will therefore be important to consider the degree of consistency with the policies of the Core Strategy and the objectives of the Framework.

The Council is in the process of producing a new Local Plan which seeks to determine the housing requirement for the borough and sets strategic policies to ensure its delivery. The Council consulted on the pre-submission version of the Plan between February and March this year and this is expected to be submitted for examination later this year. The ENP should seek to align with this document where possible to minimise conflicts and avoid being superseded by Local Plan policies when adopted, under Section 38(5) of the Planning and Compulsory Purchase Act 2004.

### **Emsworth Neighbourhood Plan**

This section highlights the key issues that Gladman would like to raise with regards to the content of the ENP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend modifications necessary for the ENP to meet the basic conditions.

### **Policy C5 – Designated Local Green Spaces**

This policy identifies 14 areas to be designated as Local Green Spaces. In order to designate land as LGS the ENP must be supported by proportionate robust evidence that demonstrates how each of the designations meets the national policy requirements set out in Paragraphs 99 and 100 of the Framework.

The requirements of the Framework are supplemented by PPG<sup>1</sup>, which states that *'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.'* As the ENP does not seek to allocate housing or ensure local housing needs are met it is not clear how this requirement has been met.

Further, having analysed the Table on Page 33 of the ENP to support the designation of LGS, this fails to consider whether each of the proposed LGS designations are local in character and not extensive tracts of land when in fact it appears that a number of the designations could be considered to be extensive tracts of land. The issue regarding what constitutes an extensive tract of land has been previously explored in numerous Neighbourhood Plan Examinations for both emerging and made Neighbourhood Plans, the following Examiner's Reports are of particular importance:

- The Examiner's Report to the Sedlescombe Neighbourhood Plan recommended the deletion of LGS measuring approximately 4.5ha as this constituted an extensive tract of land.
- The Examiner's Report to the Oakley and Deane Neighbourhood Plan recommended the deletion of LGS measuring approximately 5ha and also found it to be not local in character.
- The Examiner's Report to the Alrewas Neighbourhood Plan identified that both sites proposed for LGS designation 'in relation to the overall size of Alrewas village' comprised of extensive tracts of land measuring approximately 2.4ha and 3.7ha.
- The Examiner's Report to the Brixworth Neighbourhood Plan recommended the deletion of three proposed LGS due to the lack of evidence supporting their designation. In doing so, the Examiner recommended the deletion of 1 LGS measuring approximately 2.7ha.

#### **Policy L1 – General Housing Policy**

Criterion (b) of this policy requires 40% of dwellings on developments of more than 10 units to be affordable housing for rent. This is seeking for a greater level of affordable provision than is being sought through the emerging Local Plan and should be amended to reflect the emerging policy. The level sought by the Local Plan is the level that is expected that schemes can contribute without potentially affecting viability.

Further, affordable housing for rent is just one form of affordable housing provision and would not allow for other forms of provision to be included within the affordable housing mix. This element of the policy should also be amended to allow for other affordable tenures.

#### **Policy L3 – Walking Distances**

This policy reads more like a statement rather than a policy to be applied to a development proposal. Walking distances to local services and facilities would be a factor considered when determining the sustainability of a development proposal.

#### **Policy L5 – Avoiding Settlement Coalescence**

Gladman raise concerns with this policy and consider that further detail will be needed for a decision maker to be able to apply the policy effectively. For example, it is currently not clear which of the neighbouring settlements to Emsworth are considered to be at risk of coalescence. In this regard, this policy would benefit from these areas being listed in the policy wording and outlined on a policies map. Otherwise, as currently drafted this policy could result in a blanket restriction on all development outside the built-up area of Emsworth, that is not allocated within the Local Plan, conflicting with the basic conditions and the Framework in seeking to significantly boost the supply of housing.

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<sup>1</sup> Paragraph: 007 Reference ID: 37-007-20140306

Further, Gladman submit that new development can often be successfully located in areas between settlements without actually leading to the physical or visual coalescence of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. The policy wording does not currently reflect this and Gladman seek a modification to the policy to recognise this.

### **Conclusions**

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the ENP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours faithfully,



Planner  
Gladman

**From:** [REDACTED]  
**Sent:** 07 June 2019 13:44  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan Regulation 16 Consultation - HCC Response  
**Attachments:** Emsworth Neighbourhood Plan - HCC Response June 2019.doc

Dear Sir / Madam,

Please find attached the Hampshire County Council response on the Emsworth Neighbourhood Plan.

Regards

[REDACTED]

[REDACTED]

**Strategic Planning**  
First Floor, EII Court West,  
The Castle, Winchester SO23 8UD



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**Emsworth Neighbourhood Plan Regulation 16 Consultation  
Hampshire County Council Response – June 2019**

Paragraph / Policy Number	Object / Support / Comment	Reasons (Including Proposed Changes / Amendments)
Page 16	Comment	<p>On page 16 of the Emsworth Neighbourhood Plan the following text appears:</p> <p>There are two primary and middle schools in the town: Emsworth Primary and Middle School located in Victoria Road and Emsworth St James Primary and Middle School in Bellevue Lane. Recent new housing developments have put pressure on school places, with some new classrooms being provided through Section 106 contributions from the developers. However, it is understood that both primary schools are at full capacity. It is envisaged that further new housing will result in additional pressure on school places, which will require further funding through Section 106 contributions and/or Community Infrastructure Levy. In addition to these schools, Glenwood School serves children with special needs, located in Washington Road, off Victoria Road. This school has a much wider catchment area than Emsworth itself. The local 12 – 16 age school is Warblington School, two miles to the west of Emsworth. In addition, some children and young adults go further afield either to schools in the private sector, or to secondary schools and universities in Chichester, Portsmouth and Southampton.</p> <p>Hampshire County Council as the local education authority requests that the text is amended as set out below for accuracy:</p> <p><u>There are two primary schools in the town: Emsworth Primary School located in Victoria Road and Emsworth St James Primary School in Bellevue Lane. Recent new housing developments have put pressure on school places, with new classrooms being provided at Emsworth Primary School through Section 106 contributions from the developers. However, it is understood that both primary schools are at full capacity but this occurs throughout catchment recruitment. It is possible that further new housing will result in additional pressure on school places, which may require further funding through Section 106 contributions and/or Community Infrastructure Levy to seek another expansion to the schools. However, it is also understood that Hampshire County Council is aware of the new housing and is monitoring the need for additional places. In addition to these schools, Glenwood School serves children with special needs, located in Washington Road, off Victoria Road. This school has a much wider catchment area than Emsworth itself. The local secondary school is Warblington School</u></p>

		<p>(age range 11-16), two miles to the west of Emsworth. In addition, some children and young adults go further afield either to schools in the private sector, or to secondary schools and universities in <u>Chichester, Portsmouth and Southampton.</u></p>
Policy M1 – Havant Road Civic Square	Comment	<p>Hampshire County Council as the local Highway Authority support the principle behind this policy and agree that a scheme is needed to improve the A279 Havant Road roundabout, with the severance between the north and south of the neighbourhood area being a key issue. The Highway Authority do not support the suggestion of a shared space scheme, as visualised in figure 8. This is following the Department for Transport’s approved approach to pause all shared space schemes, announced in July 2018. In line with this guidance, the Highway Authority request that figure 8 and the case study of Poynton are omitted from policy M1. The Highway Authority also suggest that this policy includes greater reference to air quality at the junction, as referenced earlier in the plan on page 19.</p>
Policies M2, M3 and M4	Comment	<p>These policies are supported by the Highway Authority.</p>
Neighbourhood Plan Projects Schedule – Opportunity for 20mph vehicle speed limits	Comment	<p>Proposals for 20mph speed limits on individual roads or larger zones will need to be consistent with Traffic Management policy for 20mph limits. This policy is available at the following link: <a href="https://www.hants.gov.uk/transport/roadsafety/makingroadsafer">https://www.hants.gov.uk/transport/roadsafety/makingroadsafer</a>.</p> <p>Any areas or individual roads that are identified for a speed limit change by this plan will need to meet this policy with an evidence base.</p>

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 06 June 2019 10:46  
**To:** Planning Policy and Urban Design  
**Subject:** HBC's representation on Emsworth Neighbourhood Plan  
**Attachments:** HBC Consultation response to Reg16 Emsworth Neighbourhood Plan.pdf

Please find attached the representation from Havant Borough Council to the Regulation 16 consultation on the Emsworth Neighbourhood Plan.

[REDACTED]  
Principal Planning Policy Officer

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

Direct Dial: [REDACTED] | Team Phone: 023 9244 6539 | email: [REDACTED]

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Planning Policy  
Havant Borough Council  
Civic Centre Road  
Havant  
Hampshire  
PO9 2AX

Enquiries to: [REDACTED]  
Direct line: [REDACTED]  
Email: [REDACTED]  
My reference: Reg16 ENP  
Your reference: Reg16 ENP  
Date: 6 June 2019

## **Emsworth Neighbourhood Plan Regulation 16 Consultation response from Havant Borough Council**

I write to make a formal representation on the Submission Draft Emsworth Neighbourhood Plan, available for consultation until 7 June 2019.

Firstly, I would like to congratulate the Emsworth Forum for reaching this stage in their plan making. I know how much time and effort the team has put into this, and to bring together a plan when it is not your full-time job is an impressive achievement.

Overall, the Council considers that the plan meets the basic conditions for a neighbourhood plan (see attached checklist). However, there are a number of points of detail, which the Council would like to draw to the examiner's attention for further consideration during the examination.

The Council acknowledges that the Neighbourhood Plan is required to be in conformity with the adopted Local Plan. However, as the Havant Borough Local Plan 2036 is at an advanced stage of preparation, where the Council considers it pertinent, the comments below highlight the emerging policy stance of the Borough Council.

- **Policies C2 and W3:** There is an internal contradiction in the plan regarding support for particular uses in the town centre. A4 uses are supported by policy C2, but resisted through policy W3. This will make it impossible to apply the plan as a whole. In this context, the examiner may wish to take into consideration the provisions of policy C4 of the emerging Havant Borough Local Plan.
- **Policy L4:** it would be helpful if the supporting text could clarify the intention of provision b of this policy, so as to aid decision makers in assessing whether this criterion has been met. It is also unclear why this applies only to redevelopment schemes.
- **Policy W3a:** The wording of this criterion is unclear and therefore could cause difficulties in decision making. While it is clear that there is a general intention to retain industrial uses, it is not clear how this policy should be applied. The wording refers to 'exceptional circumstances' but does not define these. The only defined

exception is where retention of B1/B2 on *part* of the site would harm residential amenity. However, the inclusion of 'and' in the fourth line seems to imply that this is an additional exception to the 'exceptional circumstances'. Overall, it is not clear under what circumstances changes of use from industrial to other uses would be allowed, and there is therefore a danger that this policy is therefore too restrictive. In this context, the examiner may wish to take into consideration the provisions of policy C1 of the emerging Havant Borough Local Plan.

- **Policy W3 supporting text:** The supporting text on p51 under the heading 'banks, building societies and credit unions' acknowledges the existence of the A2 use class, but goes on to set out an expectation that those assessing planning applications should take into account a support for banks and similar uses, but a resistance to estate agents, all of which are A2 uses. Given the existence of the Use Classes Order, decision makers cannot make a distinction between different types of A2 uses. In addition, there is no actual policy text which relates to this matter, which would guide any decisions. The Council is therefore concerned that this text is not possible to implement within the planning system and raises unrealistic expectations of future planning decision making.
- **Policy M1:** The council supports the policy wording of policy M1. The council recognises the severance caused by the A259 at the heart of Emsworth, and will work with the highway authority in support of any proposals which reduce the dominance of motor traffic at the junction. However, the Council is concerned about the supporting text, which heavily references, and thereby implies plans for a 'Poynton style' scheme for Emsworth. The Council does not consider that this is a deliverable proposal for this area, as the A259 is the strategic diversion route for closures of the A27 and shared space schemes are no longer supported by the Department for Transport.
- **Design Checklist:** Point 01 is unrealistic in the face of large scale allocations being made in the Local Plan. These are acknowledged in other parts of the neighbourhood plan (eg policy L5). The broad reference to 'the informal and rural nature of open spaces in and around Emsworth in point 19', as an addition to spaces specifically protected through the Neighbourhood Plan, is similarly restrictive of development.

We hope these comments can be taken into consideration, in the interest of a final neighbourhood plan which can unambiguously guide decision making on future development in the Emsworth area.

Your sincerely,

[Redacted Signature]

[Redacted Name]

Principal Planning Officer

**Havant Borough Council**  
**Legal Compliance checklist for Neighbourhood Plans**

**Emsworth Neighbourhood Plan**

Reference	Test	HBC comment	Legally compliant?
TCPA 1990 Schedule 4B Para 5	Is the proposal in question a repeat proposal? (has HBC refused a proposal under Para 12 or Section 61E or has it failed at referendum?)	The proposal is the newly submitted Emsworth Neighbourhood Plan. It is not a repeat proposal.	Yes
TCPA 1990 Schedule 4B Para 6(2)(a) and Section 61F	Is the body who submitted the plan a qualifying body for the purposes of neighbourhood plan making?	Yes. The plan has been submitted by the Emsworth Forum, designated by HBC for the purposes of neighbourhood planning on 23 July 2014. It should be noted that the Council is currently considering an application to extend the designation for a further five years.	Yes
TCPA 1990 Schedule 4B Para 6(2)(b) and Section 61F	Does the plan proposal comply with other relevant provisions made under Section 61F?	Yes. The plan area was designated as a neighbourhood area by HBC for the purposes of neighbourhood planning on 23 July 2014.	Yes
TCPA 1990 Schedule 4B Para 1, Para 6(2)(c) and NP (General) Regulations 2012 Regulation 15	Have the qualifying body submitted the following in a satisfactory form: 1. a map or statement identifying the area to which the plan relates; 2. a consultation statement (which contains details of those consulted, how they were consulted, summarises the main issues and concerns raised and how these have been considered, and where relevant addressed in the proposed NDP as defined under Regulation 15(2)(a) of the Regs); 3. the proposed NDP; 4. a statement explaining how the NDP meets the 'basic conditions' i.e. requirements of para 8 schedule 4B to the 1990 Act. And 5. either an environmental report or a statement of reasons	Yes. The documents submitted by the Emsworth Neighbourhood Forum include the documents required by Regulation 15 (NB map identifying the area is included within the neighbourhood plan).	Yes

	why an environmental assessment is not required		
TCPA 1990 Schedule 4B para 4, para 6(2)(d) and NP (General) Regulations 2012 Regulation 15(2)(a)	Has the qualifying body complied with the requirements of regulations made under Paragraph 4 of the TCPA Schedule 4B regarding the scope of pre-submission consultation?	The Emsworth Neighbourhood Forum has complied with the requirements of the regulations in respect of the scope of the pre-submission consultation and this is evidenced within their submitted consultation statement.	Yes
TCPA 1990 Schedule 4B para 6(3), Section 61J (and also PCPA 2004 Section 38B(1)(b))	Does the plan seek to grant or support planning permission for any development categorised as 'excluded development' under Section 61K of the TCPA 1990?	The Emsworth Neighbourhood Plan does not contain policies relating to 'excluded development' under Section 61k of the TCPA 1990.	Yes
PCPA 2004 Section 38A (2)	Does the plan meet the definition of 'neighbourhood development plan', i.e. does it set out policies in relation to the development and use of land in the neighbourhood area?	The Emsworth Neighbourhood Plan meets the definition of 'neighbourhood plan.'	Yes
PCPA 2004 Section 38B(1)(a)	Does the 'neighbourhood development plan' (as defined under Section 38A) specify the time period for which it is to have effect?	Page 8 of the Emsworth Neighbourhood Plan states that the plan period is to 2036, mirroring that of the emerging Havant Borough Local Plan 2036.	Yes
PCPA 2004 Section 38B(1)(c)	Does the 'neighbourhood development plan' (as defined under Section 38A) relate to more than one neighbourhood area?	The Emsworth Neighbourhood Plan does not relate to more than one neighbourhood area.	Yes

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 03 June 2019 19:12  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan  
**Attachments:** Representation to Emsworth NP.docx

Sirs,

**Representations to Emsworth Neighbourhood Plan**  
**Objection to Policy C5 Site 2**

Please see attached letter regarding the above.

I would appreciate your acknowledgement of receipt.

Regards,

[REDACTED]



3<sup>rd</sup> June 2019

**Representations to Emsworth Neighbourhood Plan**

**Objection to Policy C5 Site 2**

We are the owners of part of the site north of Long Copse Lane allocated for development under Policy H8 of the emerging Havant Local Plan and we support the development of this allocation.

In principle we support the Neighbourhood Plan however we must lodge a technical objection to Policy C5 due to an apparent error in the drafting of the Designated Local Green Space (LGS) proposed at Hollybank Woods (Site 2).

The area proposed for LGS at Hollybank Woods extends over private land associated with Hollybank House and over the edge of an adjacent field partly within our ownership, neither of which are publically accessible. The area also appears to extend over private houses and gardens on Long Copse Lane, Aubin Wood and Hollybank Lane. The boundaries of the proposed LGS are in many places not defined by any physical feature on the ground making it unclear in reality which land is designated.

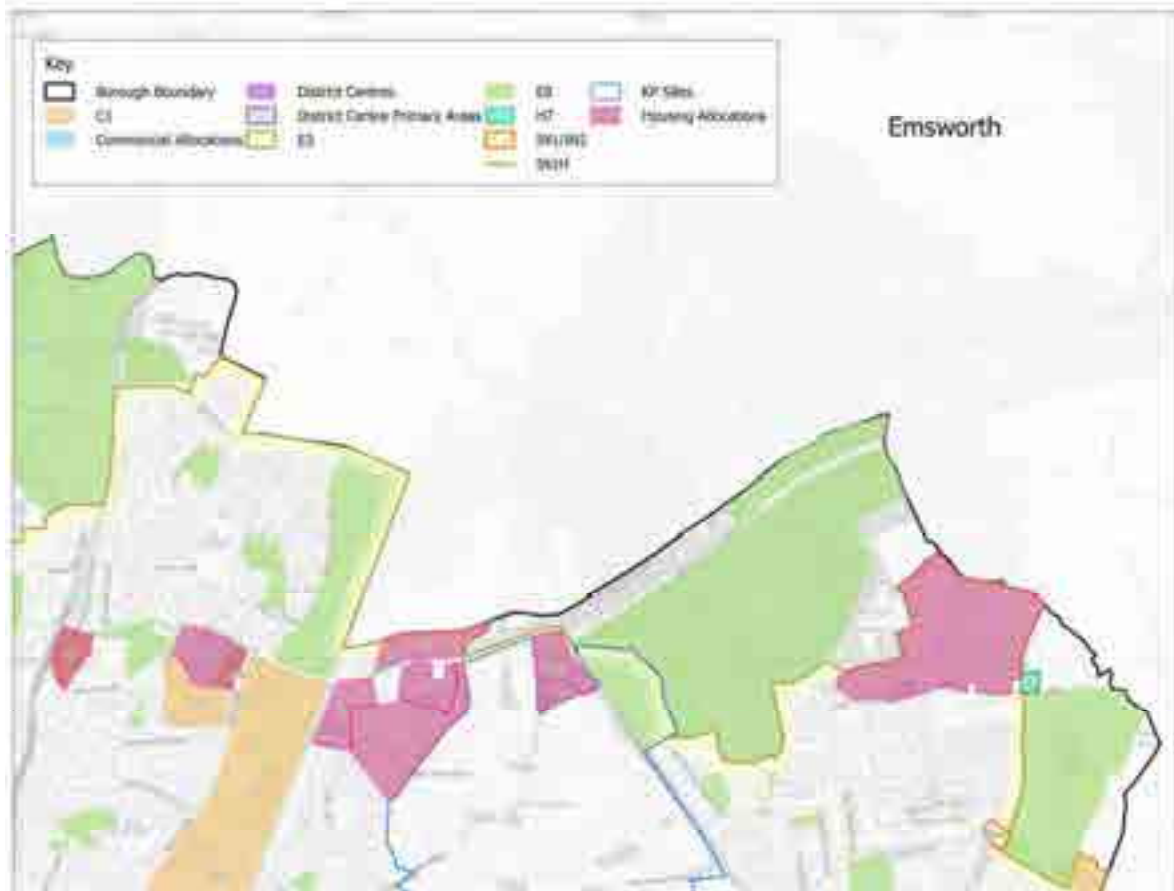
The two maps are shown separately below together with the overlay of the Policies Map and the Neighbourhood Plan's proposed LGS. The overlay shows that Policy C5 Site 2 conflicts with housing allocation H8 north of Long Copse Lane. This conflict means the Neighbourhood Plan would fail to meet the basic conditions. The boundaries of H8 and other emerging Havant Local Plan policies are clearly defined by boundaries on the map, whereas the area of Neighbourhood Plan Policy C5 Site 2 follows no clear boundary.

This error should be corrected by matching the boundary of Policy C5 Site 2 with that of the emerging Havant Local Plan Policy E8 Protection of Existing Open Space, shown in the Emsworth Policies Map. The policies serve complementary purposes and so this amendment would ensure the Neighbourhood Plan is in general conformity with the emerging Havant Local Plan as is required by the basic conditions.



**Top:** extract from proposed Policies Map for Emsworth, Havant Local Plan.

**Bottom:** extract from Emsworth Neighbourhood Plan showing proposed LGS at Hollybank Woods







**From:** [REDACTED]  
**Sent:** 30 April 2019 17:10  
**To:** Planning Policy and Urban Design  
**Cc:** Planning SE; [REDACTED]  
**Subject:** FORMAL RESPONSE: #7418 Consultation on Emsworth Neighbourhood Plan

FAO: Planning Policy Team

**Our Reference: 7418**

**Re: Consultation on Emsworth Neighbourhood Plan**

Dear Sir or Madam,

Thank you for your e-mail dated 25 April 2019 inviting Highways England to comment on Emsworth Neighbourhood Plan .

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A27.

We have reviewed the above consultation and have no comments.

Regards

[REDACTED]  
**Assistant Spatial Planning Manager (Area 3)**  
Highways England | Bridge House | Walnut Tree Close | Guildford GU1 4LZ

Web: [www.highwaysengland.co.uk](http://www.highwaysengland.co.uk)



Registered Office: Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ  
Highways England Company Limited registered England and Wales number 09346363

**From:** [REDACTED]  
**Sent:** 06 June 2019 16:48  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan Submission Version

To whom it may concern:

Thank you for consulting Historic England on the submission version of the Emsworth Neighbourhood plan. Historic England's remit is for the Historic Environment and, as such, we have limited our comments to those areas of the plan that we feel fall within our area of interest.

#### Policy H1

Whilst demonstrating the community's commitment to conserving the historic environment we feel the present policy wording passes over conserving the asset itself with the focus placed on its setting. As such we would suggest the following minor rewording:

#### POLICY H1

##### Design & Heritage

Any new development or alteration to an existing structure that affects, or has the potential to affect a heritage asset, will be required in its design, scale and materials to conserve or enhance the significance of the heritage asset or its setting, whether designated or undesignated, and the historic character of Emsworth, and to have regard to the design guidance within this neighbourhood plan.

We are satisfied that using the word 'conserve' as opposed to 'preserve' conforms with the government's approach to management of heritage assets set out in the Framework, which allows a degree of loss or addition to assets where this is part of an informed process of change designed to sustain the significance of that asset.

#### Policy H3

##### Building of local historic interest

We support the identification of non-designated heritage assets identified in the course of planning and their appropriate protection through policy in neighbourhood plans. Identifying these assets within the policy itself provides the strongest recognition of their importance, when the plan is made, will ensure they are recognised as heritage assets by the local planning authority. It is interesting that each of the non-designated heritage assets identified through the policy has held a 'public' or 'community' use that can be seen to contribute to their significance, which may not be immediately evident to decision makers more focused on their physical characteristics and, as such, the protection of this element of their significance through the policy is an example of good practice that we would be pleased to support.

The wording of the first paragraph of the policy we feel could helpfully be revised to conform more closely with the approach to conservation of heritage assets set out in the Framework and as such we would suggest the following amended text for consideration:

"The following buildings should be **conserved** for their strong local historic and architectural interest and contribution to local character:"

## Policy W5 Home Working

This is a very open policy as a result of the reference to ‘any application’ and the very positive ‘will be permitted’. It is conceivable that an application for alteration to a listed building to create a home-working space could result in harm to the building’s significance that might be avoided through better design. As such we would suggest a slight rephrasing the policy slightly to:

“Applications to create a home-based workspace will be supported provided that the proposed activity does not pose any potential for disturbance to neighbouring properties and the significance of any heritage assets that might be affected is conserved”.

We hope these comments are of assistance to the examiner, but would be pleased to answer any questions relating to them or to provide further information if required.

Yours sincerely

[Redacted signature]

[Redacted name] | Historic Places Adviser | South East England | Historic England  
Historic England, 4th Floor Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

[Redacted contact information]



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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 06 June 2019 14:30  
**To:** Planning Policy and Urban Design  
**Cc:** [REDACTED]  
**Subject:** EMSWORTH NEIGHBOURHOOD PLAN

I have read fully and understand the Neighbourhood plan

I fully support and agree with all aspects of the plan and as a local resident I applaud the effort which has gone into the production of this very comprehensive report.

***I would like to make the following comments on the plan .....***

# Very important to permanently protect all the existing green open spaces.

# There must be no housing developments permitted on agricultural land or on the Chichester Harbour AONB.

# So called 'strategic gaps' between settlements are vital to maintain the integrity of communities.

# All new developments should enhance the visual environment and harmonise with existing buildings.

both in size , scale, design and sympathetic use of building materials.

# New developments should be in tune with the Emsworth Design Statement.

# Efforts to slow traffic on the junction of Havant Road (A259) and North Street are worthy of further investigation.

# Safe cycling and walking routes between areas are important.

# Maintaining the mix of small shops and businesses are to be encouraged.

# The areas known as the 'inter bridges' sites would be ideal for a solar farm.

As a local resident I hope that my comments will be taken into account when decisions are made for the adoption of this Neighbourhood Plan.

Regards

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 30 May 2019 13:06  
**To:** Planning Policy and Urban Design  
**Subject:** Land & Partners comments on Draft Neighbourhood Plan  
**Attachments:** L&P representation to Draft Emsworth Neighbourhood Plan.pdf

Dear Sir/Madam,

Please find attached representations on behalf of Land & Partners on the Draft of the Emsworth Neighbourhood Plan.

Please could you confirm receipt?

Kind regards,

[REDACTED]

Project Planner

for and on behalf of  
Land & Partners Limited  
8 High Bois Lane  
Amersham  
Bucks HP6 6DG

[REDACTED]

[www.landandpartners.com](http://www.landandpartners.com)



May 2019

## Land & Partners Representations to Emsworth Neighbourhood Plan

### Objection to Policy C5 Site 2

Land & Partners is promoting the land north of Long Copse Lane for the development of up to 260 homes. The site is allocated for this purpose in the emerging Havant Local Plan under Policy H8.

In general Land & Partners supports the Neighbourhood Plan however we must lodge a technical objection to Policy C5 due to an apparent error in the drafting of the Designated Local Green Space (LGS) proposed at Hollybank Woods (Site 2).

The area proposed for LGS at Hollybank Woods extends over private land associated with Hollybank House and over the edge of an adjacent field, neither of which are publically accessible. The area also appears to extend over private houses and gardens on Long Copse Lane, Aubin Wood and Hollybank Lane. The boundaries of the proposed LGS are in many places not defined by any physical feature on the ground making it unclear in reality which land is designated.

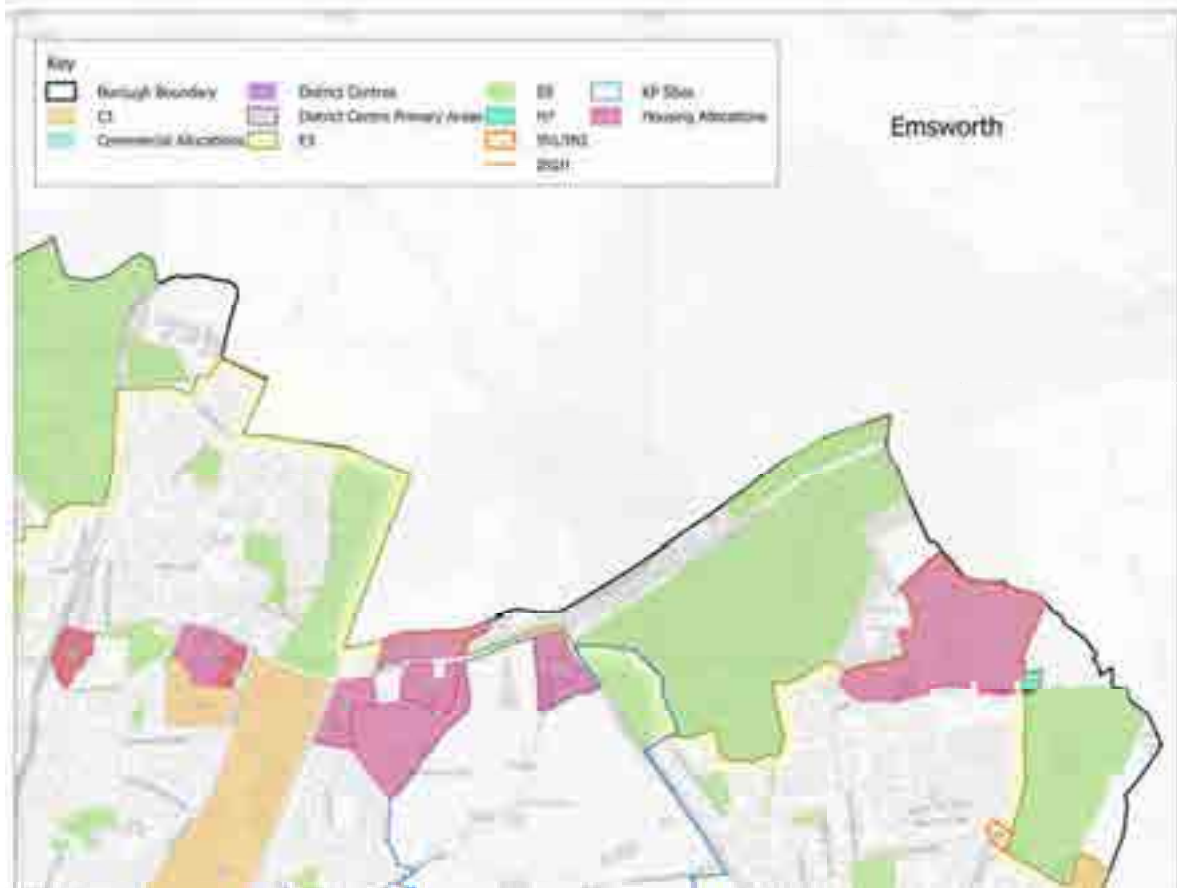
An overlay of the Policies Map and the Neighbourhood Plan's proposed LGS is included with this representation. The two maps are shown separately below. The overlay shows that Policy C5 Site 2 conflicts with housing allocation H8 north of Long Copse Lane. This conflict means the Neighbourhood Plan would fail to meet the basic conditions. The boundaries of H8 and other emerging Havant Local Plan policies are clearly defined by boundaries on the map, whereas the area of Neighbourhood Plan Policy C5 Site 2 follows no clear boundary.

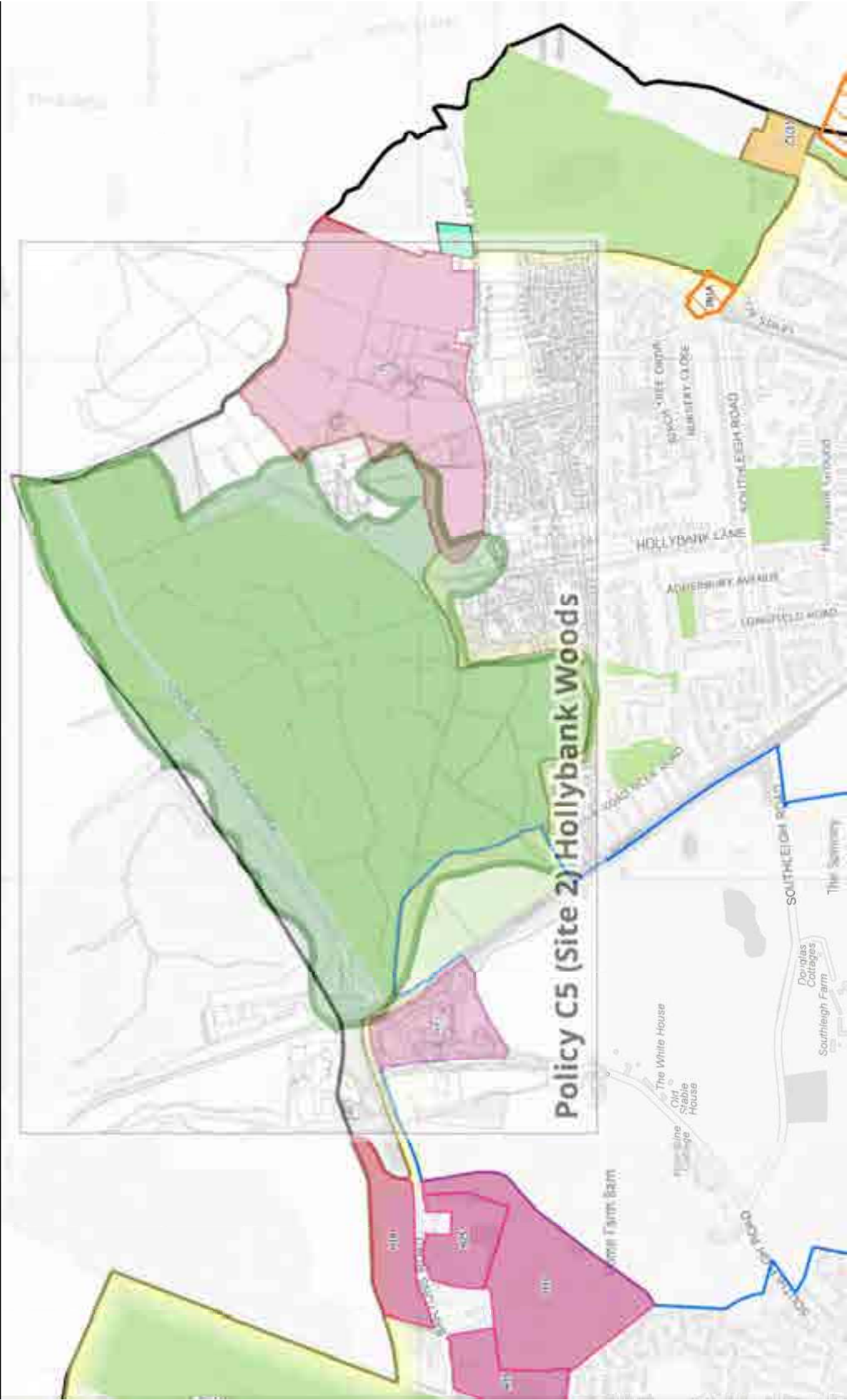
This error should be corrected by matching the boundary of Policy C5 Site 2 with that of the emerging Havant Local Plan Policy E8 Protection of Existing Open Space, shown in the Emsworth Policies Map. The policies serve complementary purposes and so this amendment would ensure the Neighbourhood Plan is in general conformity with the emerging Havant Local Plan as is required by the basic conditions.



Top: extract from proposed Policies Map for Emsworth, Havant Local Plan.

Bottom: extract from Emsworth Neighbourhood Plan showing proposed LGS at Hollybank Woods





[REDACTED]

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**From:** [REDACTED]  
**Sent:** 02 June 2019 15:28  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan

## Emsworth Neighbourhood Plan

We have read the very detailed (submission version) of the Plan, which has a great deal to recommend it.

The division of the area between north and south does need to be softened so that the areas North of the A259 can be fully accessible by all Pedestrians in the area.

This suggested road layout and plan, would very much enhance the development of the proposed Hospital site, together with the other buildings to the west of North Street, (old Post office, community centre, fire station etc).

Further north at the Hampshire Farm housing site with its green area and allotments, the continuation of the walkway south, to join the proposed designated green space (11 - Emsworth Valley corridor), would incorporate a valuable amenity site with a similar green site across the river, in the Chichester district.

This combined corridor (particularly with the absence of street lighting) would protect this area for future residents and wildlife - there is already wildlife about - the regular visits of the buzzards show that.

The Forum have covered well the areas of the Village Centre, the waterfront, and social and business needs. The emphasis to include a good target for affordable housing has much to be admired - we hope it can be achieved.

The Plan is well considered, well written and sound. We feel it amply covers the needs and aspirations of Emsworth residents and believe it deserves support from Havant Town Council.

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 02 June 2019 07:53  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan

I would like to express my overall support for the Emsworth neighbourhood Plan as presented. As a resident of Emsworth [REDACTED] I value the unique qualities that make Emsworth such a great place to live, and want to see those qualities preserved and enhanced.

Over the last few years, we have seen a gradual erosion of green space around the town. I particularly want to preserve those green spaces as identified in section C5. Two of those areas are particularly important: the are known as the Horse Field, which forms part of the Chichester Harbour AONB, and the Ems Valley Corridor, which has also been the subject of speculation over future housing plans. Both of these areas are vital to maintaining the right balance in Emsworth.

I would also particularly support the concept of the Havant Road Civic Square (policy M1). The division between the two parts of the town created by the A259 needs to be addressed, and the concept outlined in this policy seems a good solution. I have seen how this kind of plan has worked in Poynton, Cheshire, confounding the critics and cynics who said it wouldn't work.

Best wishes

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 05 June 2019 08:51  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan Objection

Dear Sir / Madam

I have recently been made aware of the Emsworth Neighbourhood Plan and wish to make an **objection** to part of the proposals.

As an Emsworth resident [REDACTED] and local long established business owner I am generally pleased to see such a plan however

I must point out an error in the submitted document.

I own [REDACTED] and when the inner relief road was put it our Land to the rear was divided leaving us with a strip of land from the road to Gooseberry Cottage next to Peters Pond. This Land is not part of Brook Meadow and I would like that reference to be removed ( Page 34 Brook Meadow Nature Reserve ( Site ) reference to Policy C5)

I would also like any other reference to our land to be removed from the document.

I would appreciate confirmation that this issue has been resolved.

Your sincerely,

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 06 June 2019 11:12  
**To:** Planning Policy and Urban Design  
**Cc:** [REDACTED]  
**Subject:** Neighbourhood Plan Representations Submission Plan  
**Attachments:** Emsworth NP Reps (June 2019) - Turley.pdf

Good Morning,

Attached to this email is a response to the Emsworth Submission Draft Neighbourhood Plan consultation.

Please can you confirm that you have received this representation letter.

If you have any questions please let me know.

Kind regards,

[REDACTED]

[REDACTED]  
Assistant Planner

## Turley

2 Charlotte Place  
Southampton SO14 0TB  
T 02380 724 888

[turley.co.uk](http://turley.co.uk)

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06 June 2019

**Delivered by email**

Emsworth Forum  
The Community Centre  
North Street  
Emsworth  
PO10 7DD

Ref: ASHR3002

Dear Sir / Madam,

### **EMSWORTH NEIGHBOURHOOD PLAN**

We write on behalf of our client, [REDACTED] in respect of the current consultation on the Emsworth Neighbourhood Plan Submission Version (April 2019). Our client has important land interests in the Neighbourhood Plan area, in particular SHLAA Site UE11, Land west of Emsworth which has previously been promoted through the Local Plan process for residential and/or retirement living development.

We note that the Neighbourhood Plan does not propose any site allocations and instead proposes policies which will seek to guide the form of development when sites are allocated for development through the new Local Plan 2036 for Havant. It is considered that this is an appropriate approach which will help to ensure the Neighbourhood Plan is not rendered quickly out of date following the adoption of the Havant Local Plan 2036 in due course.

In following this approach it is important however that the Neighbourhood Plan does not prejudice the future delivery of development in the Plan area, and provides sufficient flexibility to respond to the requirements of the Pre-Submission Havant Local Plan 2036 and changing circumstances in the years ahead.

In this regard we make the following observations on a number of emerging Neighbourhood Plan policies:

Policy C5 of the Submission Version Neighbourhood Plan proposes to designate the following green spaces as 'Local Green Spaces':

- Brook Meadow Nature Reserve
- Hollybank Woods
- Ensworth Community Hospital Garden

6th Floor North  
2 Charlotte Place  
Southampton  
SO14 0TB

T 023 8072 4888 [turley.co.uk](http://turley.co.uk)

- Hampshire Farm Meadow
- Southleigh Park Recreation Ground
- Horndean Road Recreation Ground
- Nore Barn Woods
- Peter's Pond (part of)
- Emsworth Town Millpond
- Horse Field (part of Chichester Harbour AONB)
- Emsworth Valley Corridor
- Washington Road Allotment
- Warblington Road Allotment
- Redlands Grange Allotment

With regards to these areas, the Policy states:

*“a) Planning applications for development that may cause significant harm to the designated green spaces, natural environment or habitats of the neighbourhood plan area will be refused.*

*b) New development proposals that detract from the visual, historic, recreational, landscape or ecological value of designated green spaces will not be supported.”*

Concern is raised that by seeking to designate locations as Local Green Space the Neighbourhood Plan is seeking to artificially restrict potential development sites in locations around the settlement. It is also viewed that wider public access to open space would benefit from connections to an existing proposed allocation. It is important that the Neighbourhood Plan allows sufficient flexibility to ensure it is able to respond to the requirements as set out in the Pre-Submission Havant Local Plan 2036.

As shown on the supporting plans, our client's site to the west of Emsworth is proposed for designation as a Local Green Space forming the 'Chichester Harbour AONB (part of)' site.

Paragraph 99 of the National Planning Policy Framework (NPPF) establishes the principle of the identification of Local Green Spaces through Neighbourhood Plans. Paragraph 100 of the NPPF provides further guidance on the designation of Local Green Spaces and states that:

*“The Local Green Space designation should only be used where the green space is:*

- a) In reasonably close proximity to the community it serves;*
- b) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*



c) *Local in character and is not an extensive tract of land.*”

The supporting text to the Neighbourhood Plan identifies the following justification for the proposed designation of the Local Green Spaces:

*“The Emsworth Neighbourhood Plan has identified this network of green infrastructure and open spaces through the town, linked to the surrounding countryside, that the community use for enjoyment and have a wildlife benefit and value. They are afforded Local Green Space designation here to protect them into the future... These have been considered worthy for inclusion due to their value to Emsworth based on the following five criteria:*

- *Beauty – A place of aesthetic beauty that adds to the visual qualities of the town.*
- *History – A place with significant historical importance for the town.*
- *Recreation – A place which offers formal or informal recreation and sporting opportunities for residents and visitors.*
- *Tranquillity – A place that offers an escape from everyday urban noise and activity.*
- *Wildlife – A place that provides a haven for wildlife, both animals and plants.”*

In respect of our client’s site at land west of Emsworth, it is identified as having been proposed for designation due to the following three criteria:

- Beauty
- Tranquillity
- Wildlife

With respects to ‘beauty’, the Neighbourhood Plan defines this as a “place of aesthetic beauty that adds to the visual qualities of the town.” The site is designated as forming part of the Area of Outstanding Natural Beauty (AONB) and as such in accordance with the requirements of the NPPF is afforded a high level of protection.

However, whilst our client’s site is designated as forming part of the AONB, it has a close relationship to the adjoining settlement. Existing built development bounds the site to both the north and east and the site is considered to read as part of the existing settlement. The site is not publically accessible although a public footpath runs along its western boundary. The public footpath is well screened from the site by existing vegetation and as such the site is not perceived as forming part of the wider AONB. Whilst the northern boundary of the site is relatively clear of vegetation the site is perceived in combination with the existing settlement and long distance views across the remainder of the site to the Harbour are prevented by intervening vegetation. There are also a number of structures located on the site which further detracts from the AONB designation and emphasises the built form surrounding the site.

The northern parcel of the site is comprised of paddocks used for the grazing of horses and as such is not an untouched natural landscape and is therefore of a significantly different character to the remainder of the AONB. The southern parcels are actively farmed and there are several dilapidated buildings located on the area of the site, against the western boundary, which is proposed as Local Green Space, so again

do not form an untouched landscape. Appendix 1 outlines photos of this site. As such it is considered that the site does not meet the 'beauty' criteria for the Local Green Space designation.

The Neighbourhood Plan defines 'tranquillity' as being demonstrated by a "place that offers an escape from everyday urban noise and activity." As discussed above, whilst a public footpath runs along the western boundary of the site there is no public access to the site and as such the site cannot be considered a place that offers an escape. Furthermore the public footpath is located in close proximity to the existing settlement and Havant Road to the north and as such it is considered that this is an area where everyday urban noise and activity will be experienced, not a place that offers an escape from the experience of these. For these reasons it is considered that the site does not meet the requirements in respect of tranquillity.

With regards to 'wildlife', the Neighbourhood Plan defines qualifying sites as a "place that provides a haven for wildlife, both animals and plants." As discussed above the northern parcel of the site is used for the grazing of horses and the southern parcel is used actively for arable farming. It is therefore considered to be of limited ecological value. Whilst there are features such as existing trees and hedgerows within the wider site which may be of some ecological value, these would be of no more value than found in many countryside locations and is considered insufficient justification to designate the site as a Local Green Space. It is acknowledged that the southern portion of the site is designated as a Site of Important Nature Conservation and as such has been recognised as being of ecological value. This is however considered to be further justification as to why the site should not be designated as Local Green Space given the site is located within a larger site which is already subject to existing levels of protection.

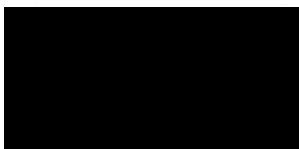
For the reasons outlined above we do not consider that the site meets the criteria which the Neighbourhood Plan Forum has itself created for the designation of Local Green Spaces.

The site clearly does not meet the criteria outlined in the NPPF for when sites should be considered for designation as a Local Green Space, and furthermore the site is already subject to designations which mean that the additional designation as a Local Green Space is unnecessary. Furthermore the site is not publically accessible.

As highlighted at the beginning of this letter, the site has been promoted for residential and / or retirement living development through the Local Plan process. [REDACTED] would be happy to engage with the Neighbourhood Plan group regarding the potential for development for the site, including potential for parts of the site to be opened up for public access as part of holistic proposals for the site.

We trust that the Neighbourhood Plan Forum will consider the above comments in the next stages of development of the Plan and we look forward to continuing to engage with this process. Should you require any clarification of the comments made or wish to discuss in further detail please contact us.

Yours sincerely



**Associate Director**









[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 06 June 2019 23:25  
**To:** Planning Policy and Urban Design  
**Cc:** [REDACTED]  
**Subject:** Consultation Response on the Emsworth Neighbourhood Plan (Submission Version)  
**Attachments:** Emsworth NP Reps 06 06 19.pdf

Dear Sir/Madam

Please find attached representations in relation to the Emsworth Neighbourhood Plan (Submission Version) on behalf of [REDACTED]

I would appreciate if you can confirm receipt by return email.

Kind Regards

[REDACTED]  
Director



Ground Floor, Building 1000  
Lakeside North Harbour, Western Road  
Portsmouth, PO6 3EZ  
[REDACTED]



Planning Policy,  
Havant Borough Council,  
Civic Centre Road,  
Havant,  
PO9 2AX

06 June 2019

Dear Sir/Madam,

## **Consultation Response on the Emsworth Neighbourhood Plan (Submission Version)**

Nova Planning Limited has been instructed to submit representations on the Submission Version of the Emsworth Neighbourhood on behalf of [REDACTED]

These representations look at the implications of policies contained within the emerging Neighbourhood Plan and how they would guide appropriate development and ensure deliverability. The positive approach being adopted in this document is broadly supported. However, we have serious concerns over its conformity with strategic policies at a Borough level, particularly in relation to affordable housing where there is a clear departure from the equivalent affordable housing policy in the emerging Havant Borough Local Plan 2016 – 2036 (hereafter referred to as ‘the emerging Local Plan’).


### Reliability of the Evidence Base

The emerging Local Plan derives its affordable housing requirement from an extensive and robust evidence base, which includes the ‘Specialist Housing Analysis’ (January 2019) and the ‘Local Plan and CIL Viability Study’ (January 2019). Both documents have been prepared in line with the new National Planning Policy Framework (NPPF) and as such are very much up-to-date. This evidence also represents a balanced Borough-wide assessment that takes account of affordable need across all Parishes, including Emsworth.

The affordable housing requirement in the emerging Neighbourhood Plan is underpinned entirely by the Emsworth Housing Needs Assessment (April 2016). This evidence is significantly out-of-date when considered against the new NPPF and the document makes a number of broad assumptions based on datasets which have been produced for the wider PUSH housing market areas and Havant Borough. The application of this data at Parish level results in speculative conclusions and recommendations. More fundamentally, the document was prepared solely in the context of the adopted Local Plan Core Strategy (2011) and Allocations (2014) with no consideration given to the emerging Local Plan. This is evidenced throughout the document and it is specifically acknowledged in the ‘Recommendations for next steps’, which states (my underlining for emphasis):

 [www.novaplanning.co.uk](http://www.novaplanning.co.uk)

 [REDACTED]

 Ground Floor, Building 1000, Lakeside  
North Harbour, Western Road,  
Portsmouth, PO6 3EZ

Nova Planning Limited, Registered in  
England & Wales Number: 11136359

**“Neighbourhood Planning Basic Condition E, which is the need for the neighbourhood plan to be in general conformity with the strategic development plan (here, the adopted Local Plan)”**

**Paragraph 176 (second bullet) of Housing Needs Assessment (April 2016)**

As the only evidence underpinning Policy L1 fails to have any regard to the emerging Local Plan and its evidence base, both of which are at an advanced stage of production, then it cannot be in ‘general conformity’ with strategic policies and it fails to meet this basic condition.

Viability Testing

Our other fundamental concern relates to the lack of viability testing for the level of affordable housing proposed in the emerging Neighbourhood Plan and the requirement for provision to be entirely ‘affordable rent’. Viability testing is a fundamental consideration in the formulation and application of affordable housing policies for plan-making at all levels. There is no evidence that viability has been factored into the higher affordable housing requirement in Policy L1 of the emerging Neighbourhood Plan. This approach is completely at odds with Planning Practice Guidance (PPG), which provides clear direction in this regard (my underlining for emphasis):

**“These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106.”**

**PPG Paragraph: 001 Reference ID: 10-001-20190509**

The implications of viability are clearly set out in the ‘Local Plan and CIL Viability Study’ (January 2019) as follows:

**“Overall, we continue to consider that an affordable housing policy headline target applicable at 10+ dwellings, and seeking not more than 30%, is likely to be workable in striving to secure an optimal level of affordable homes provision in a majority of cases. As noted here and recognised in the Council’s proposed policy approach, viability will need to be reviewed in some cases. The approach also acknowledges that in some limited cases, the contributions made towards meeting affordable housing needs may take the form of wider financial enabling (i.e. provision accepted through financial contributions in certain circumstances).**

**Paragraph 28 of the Local Plan and CIL Viability Study (January 2019).**



This evidence is based on up-to-date build costs and a thorough analysis of the implications of affordable housing and CIL. It clearly states that the emerging Local Plan should seek “not more than 30%”. When read with the subsequent sentence, which states that 30% is “likely to be workable in most cases”, the implications are clear. 30% should be applied as a maximum target with the policy providing scope for reduced provision where site-specific viability evidence is presented with planning applications. This is reflected in the wording of Policy H2 of the emerging Local Plan. Applying a 10% uplift in the requirement without any viability provision, as would be the case with Policy L1, would effectively sterilise development and result in an overall reduction in affordable housing provision in Emsworth.

Policy L1 of the emerging Neighbourhood Plan also requires the tenure of all affordable housing provision to be ‘affordable rent’. This position is taken without any regard to Policy E2 of the emerging Local Plan, which references an appropriate tenure split of 70% ‘affordable rent’ and 30% ‘intermediate’ following the viability testing of different scenarios in the Local Plan and CIL Viability Study (January 2019). Prescribing the tenure as per Policy L1 will make residential development unviable and in doing so jeopardise affordable housing delivery in Emsworth. This would be the case even if the requirement itself was reduced from 40% to 30%. In addition, it does not allow for variations in the nature of affordable need over the lifetime of the Plan where for example there is substantial affordable housing delivery from strategic development locally (Southleigh and Land North of Long Copse Lane). The policy needs to be more flexible to respond to these potential scenarios.

### Conclusions

The evidence put forward with Policy L1 of the emerging Neighbourhood Plan is out-of-date. It pre-dates recent changes to the NPPF in 2018 and 2019 and it does not have any regard to the emerging Local Plan, including up-to-date evidence of need. In these respects, Policy L1 is not in general conformity with the Policy H2 contained within the Local Development Plan and it conflicts with the NPPF. In this regard it fails to meet one of the basic conditions.

The Policy has not been viability tested, as should be the case for all affordable housing policies, and the recent viability study commissioned by Havant Borough Council confirms that provision over 30% is likely to render development proposals unviable when considering all other development costs. Similarly, if the tenure of affordable housing is prescribed as ‘affordable rent’ only, then residential development will become unviable. Furthermore, prescribing a single tenure of affordable housing risks a situation whereby compliance with this policy fails to address changes in the nature of local need across tenures.

We recommend that emerging Neighbourhood Plan Policy L1 be amended to reflect Policy H2 of the emerging Local Plan to reflect the up-to-date evidence available. Policy L1 should revert to a requirement of 30% in line with viability testing underpinning the emerging Local Plan with an allowance for reduced provision where site-specific viability issues exist. It should prescribe a specific tenure and this should be a matter for negotiation during the planning application process.

Yours sincerely

[Redacted signature]

Director



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 05 June 2019 06:26  
**To:** Planning Policy and Urban Design  
**Cc:** [REDACTED]  
**Subject:** The Emsworth Plan

To whom it may concern:

Laudible as it is - and deserving of great credit to all of those who have persevered and been involved in its production - I would like to proffer the following small comments:

1. Under 'Policy H3 Buildings of Local Historic Interest' there is no mention of the building housing 'The Greenhouse Cafe' or 'The Hut' (King Street).
2. Under 'Policy W4' there's no mention of Emsworth's link to the eminent writer and composer P G Wodehouse who is possibly the strongest, and unexploited, 'cultural' contribution within Emsworth's history.
3. The Emsworth Conservation Area and the line of the Neighbourhood Plan Boundary is unclear in it's definition and doesn't appear to include 'Gooseberry Cottage' which is on the west side of Peter Pond, and the land to the south of it as far as the A259, which is all within Havant Borough Council. To omit this would be a travesty as it preserves the rural landscape of Peter Pond.

Small points, but I hope they are useful.

Best wishes,

[REDACTED]  
(WemsFest Artistic Director)

[REDACTED]

[www.wemsfest.com](http://www.wemsfest.com)

**Originators of the World's First Ever Red Nose Town (Comic Relief)**

**7th WemsFest 'Season' 14 September 2018 - 12 June 2019**

[www.wemsfest.com](http://www.wemsfest.com)

**4th Emsworth Beer, Cider & Wine Festival 27 - 29 September 2019**

**NB: WemsFest and its sibling events & festivals are run by WemsFest which is a Community Interest Company Reg: 847057**

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 31 May 2019 08:56  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan Consultation  
**Attachments:** Emsworth NP REP 31.05.19.pdf

Dear Sir/Madam,

Please find the attached response on behalf of National Grid.

Kind regards

**Wood on behalf of National Grid**

Planning & Design| E&I UK  
Wood Plc  
Gables House, Kenilworth Road, Leamington Spa, CV32 6JX  
[REDACTED]



Planning Policy  
Havant Borough Council  
Civic Centre Road  
Havant  
PO9 2AX

[REDACTED]  
Consultant Town Planner

Sent by email to:  
[Policy.design@havant.gov.uk](mailto:Policy.design@havant.gov.uk)

31 May 2019

Dear Sir / Madam

**Emsworth Neighbourhood Plan Consultation  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

**About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.

**Specific Comments**

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has **no record** of such apparatus within the Neighbourhood Plan area.

Nicholls House  
Homer Close  
Leamington Spa  
Warwickshire CV34 6TT  
United Kingdom  
Tel +44 (0) 1926 439 000  
woodplc.com

Wood Environment  
& Infrastructure Solutions UK Limited  
Registered office:  
Booths Park, Chelford Road, Knutsford,  
Cheshire WA16 8QZ  
Registered in England.  
No. 2190074



## Electricity Distribution

The electricity distribution operator in Havant Borough Council is Scottish and Southern Electricity Networks. Information regarding the transmission and distribution network can be found at: [www.energynetworks.org.uk](http://www.energynetworks.org.uk)

## Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.

[REDACTED]  
Consultant Town Planner

[REDACTED]  
Development Liaison Officer, National Grid

[REDACTED]

Wood E&I Solutions UK Ltd  
Nicholls House  
Homer Close  
Leamington Spa  
Warwickshire  
CV34 6TT

National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
Warwickshire  
CV34 6DA

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully

[via email]

[REDACTED]  
**Consultant Town Planner**

[REDACTED]

## Where we operate

### Our UK network



**From:** [REDACTED]  
**Sent:** 24 May 2019 14:15  
**To:** Planning Policy and Urban Design  
**Subject:** 281038 Regulation 16 Consultation on Emsworth Neighbourhood Plan  
**Attachments:** 281038 Consultation on Emsworth Neighbourhood Plan - Reg 16.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good afternoon,

Please find attached Natural England's response to the above consultation.

Kind regards,

[REDACTED]  
Sustainable Development Adviser  
Area 13 - Dorset, Hampshire & IoW  
Natural England  
[REDACTED]

Eastleigh House, Upper Market Street, Eastleigh, SO50 9YN



[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing

**Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.**

**These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

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Date: 24 May 2019  
Our ref: 281038  
Your ref: N/A



Planning Policy  
Havant Borough Council  
**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam,

### **Planning consultation: Emsworth Neighbourhood Plan**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Thank you for your consultation dated 25 April 2019.

Natural England provided initial comment on the Emsworth draft Neighbourhood Plan on 18 December 2017 and had no specific recommendations for amendment to the draft document. Therefore our advice on the regulation 16 consultation contains only advice further to that contained in our previous consultation response.

### **Solent Wader and Brent Goose Strategy**

The Neighbourhood Planning Group should be aware that the neighbourhood plan area includes sites that are identified in the Solent Waders and Brent Goose Strategy (sites H22B and H22A). This Strategy relates to the network of non-designated terrestrial wader and brent goose sites that support the Solent SPAs from land take and recreational pressure associated with new development. Further information is available [here](#) and this includes maps and guidance. We advise that the ecological value and sensitivity of these areas is incorporated into policies, where appropriate.

I trust this advice will assist you and the authority in considering the application further. Please contact me if you have any queries relating to this advice.

Yours sincerely

  
**Sustainable Development Adviser**  
**Natural England - Dorset, Hampshire and Isle of Wight**



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 06 June 2019 11:31  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan - Regulation 16 Consultation on Submission Draft

Dear Sir/Madam,

I have read the Submission Emsworth Neighbourhood Plan and wish to comment upon one of its policies:

## **Policy C5 – Designated Local Green Spaces**

I strongly **support** the inclusion of Site 11 – Emsworth Valley Corridor in Policy C5 of the Submission Neighbourhood Plan. The proposed site area is a natural green corridor which is enjoyed by residents of Emsworth and Westbourne for its rural character and opportunities to observe many wildlife species.

Public access to Site 11 is provided by Havant Footpath 73 which is a popular and historic right of way linking the communities of Emsworth and Westbourne. Footpath 73 also forms part of the Sussex Border Path, an important long-distance recreational walking route that follows the inland boundary of the historic county of Sussex. According to the Ramblers' Association the main attraction of the Sussex Border Path is its 'surprisingly remote and unspoilt quality in this particularly crowded part of England'. This is a particularly apt description of Havant Footpath 73.

Adjoining Site 11 on its eastern side is Chichester District Council's proposed Hermitage to Westbourne Strategic Wildlife Corridor. This is one of several such corridors identified in the Strategic Wildlife Corridors Background Paper published by the District Council in December 2018 as part of its Local Plan Review. Details of this corridor are set out in paragraphs 5.1-5.2 and Figure 1 of the background paper. Taken together these proposed corridors form the basis of Policy S30 Strategic Wildlife Corridors in the current Chichester District Local Plan Review: Preferred Approach 2016-2035.

The designation of Site 11 as a Local Green Space in the Emsworth Neighbourhood Plan would therefore complement an important strategic wildlife corridor identified as part of Chichester District Council's Local Plan Review. Local wildlife species and habitats would benefit considerably if a coordinated approach to the protection and promotion of biodiversity could be followed on both sides of the Havant Borough/Chichester District boundary.

To sum up, I believe there is a strong case for affording Site 11 - Emsworth Valley Corridor the protection that a Local Green Space designation would provide. Its inclusion in the 'made' Emsworth Neighbourhood Plan would formally recognise its value to local communities and help to prevent inappropriate development, thereby consolidating what is currently a fragile gap separating the settlements of Emsworth and Westbourne.

Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** 06 June 2019 16:05  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan  
**Attachments:** 190605 Emsworth Neighbourhood Plan\_HT.pdf

Dear Planning Policy Team

Please find attached comments from Portsmouth Water in relation to the above referenced Neighbourhood Plan.

Kind regards

[REDACTED]  
[REDACTED]  
Biodiversity and Environmental Specialist – Havant Thicket  
Portsmouth Water  
[REDACTED]

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[www.portsmouthwater.co.uk](http://www.portsmouthwater.co.uk)  
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Registered Office: Portsmouth Water Ltd, P.O. BOX NO.8, West Street, Havant, Hampshire. PO91LG. Telephone (02392)499888. Fax (02392) 453632. Registered in England No 2536455. VAT No. GB 615375835.



Registered Office:  
Portsmouth Water Ltd  
PO Box 8  
Havant  
Hampshire PO9 1LG

Tel: 023 9249 9888  
Fax: 023 9245 3632  
Web: [www.portsmouthwater.co.uk](http://www.portsmouthwater.co.uk)

**CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING  
(DEVELOPMENT MANAGEMENT PROCEDURE ENGLAND) ORDER 2010**

<b>Applicant:</b>	<b>Emsworth Neighbourhood Forum</b>
<b>Planning Application Reference:</b>	<b>N/A</b>
<b>Proposal:</b>	<b>Emsworth Neighbourhood Plan</b>
<b>Location:</b>	<b>Emsworth</b>
<b>Grid Ref:</b>	<b>Choose an item. Click or tap here to enter text.</b>
<b>Date:</b>	<b>06 June 2019</b>

Dear Planning Policy Team

Thank you for consulting Portsmouth Water in relation to the above referenced Neighbourhood Plan. You will be aware that we have been carrying out extensive ecological surveys in relation to proposals for a new winter water storage reservoir at Havant Thicket. This work has identified a suite of protected and notable species including at least 13 species of bats in the local area, and notably a population of Bechstein's bat *Myotis bechsteinii*. The Bechstein's bat is considered to be a notable bat species in Hampshire, and has an estimated UK population of 1,500 individuals. It is included on Annex II of the EU Habitats and Species Directive and included on the Section 41 list of species of principle concern.

Our work has identified a breeding population that numbers at least 108 bats, (based on 2009 data) within 3km of the proposed reservoir site. These bats use a network of habitats that include woodland, grassland and parkland, Hollybank Wood is one of the areas supporting the species. We acknowledge that new housing in the plan area will be permitted as specified in individual site policies contained in the Havant Local Plan, and as such there are no new allocations included within this plan. However, we wish to draw attention to the importance of maintaining the functioning corridors along which bats from the colony can commute and forage, in order to ensure that the core sustenance zones for the colony, which includes Hollybank Wood and the wider area are maintained.

The in combination effects of development put forward without proper consideration of the species could see important foraging or commuting routes severed, either directly through development or indirectly through inappropriate lighting. Policy L5 will have an important role to play, since it seeks to maintain gaps between Emsworth and neighbouring

settlements. If habitat in these gaps is maintained in a favourable condition for the species, these would help ensure that bats can continue to move around the local areas unimpeded.

We are aware that Havant Borough Council have been preparing a protocol for the local Bechstein's bat colony. Portsmouth Water would welcome the opportunity to help with the preparation of this document in order that future development in the local area is delivered to ensure that the favourable conservation status of the species is maintained.

Havant Thicket Reservoir Team

*Portsmouth Water*



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 06 June 2019 14:08  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan

I am writing to request that Havant Borough Council support the Emsworth Neighbourhood Plan.

This plan supports the need to maintain and develop the economy of Emsworth, in changing future times, and to encourage the balance between North and South Emsworth.

This plan has supported the policy for designated green spaces(Policy C5) particularly River Ems Valley Corridor. which runs from Emsworth Harbour and the south Downs National Park This area is needed by River Boards and Environment Authority to fulfil their Future Flood plans between existing Flood area concerns at Westbourne and Lumley. This corridor is part of an existing natural break between the counties of Hampshire and West Sussex which should remain as a Wildlife Corridor, including the national recognised Sussex Path and not be developed. This concurs with the plans that are included in the Chichester/West Sussex Local plans

This plan has determined that Housing development plans in Emsworth have been exceeded, thus no appeals for reconsideration of declined developments should be re-opened. A shortage of Assisted Housing in the Emsworth Area should be considered in the large planned development of the Emsworth/Havant site rather than spread across smaller sites.

Yours sincerely

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 02 June 2019 14:29  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Emsworth Forum  
**Attachments:** Plan A.pdf; Untitled attachment 00010.html

**Categories:** Emsworth Neighbourhood Plan

Hi [REDACTED]

See below a response we have received – are you able to tell me if it has gone into your consultation responses? If not, can you add it?

Best wishes

---

[REDACTED]  
**Sent:** 01 June 2019 08:04

[REDACTED]  
**Subject:** Emsworth Forum

Dear [REDACTED]

I have recently been made aware of the Emsworth Neighbourhood Plan and wish to make an **objection** to part of the proposals.

As an Emsworth resident [REDACTED] and a Local Architectural Designer, I am generally pleased to see such a plan however I must point out an error in the submitted document.

I am a Land owner [REDACTED] and would like any reference to our Land being Part of Brook Meadow **removed** as it does not form part of this area.

It would appear on **page 34** our land has been included in the **Brook Meadow Nature Reserve (Site) referenced to Policy C5**, when clearly it is not.

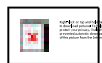
As I have not been consulted on this and the Forum have not asked our permission, I must insist that the diagram be changed to remove our land from the Nature Reserve (see attached diagram - **Plan A**).

I would also appreciate it if any other reference to our Land be removed from the Forum document.

Please confirm this has been actioned before any decision is enforced.

I look forward to hearing from you at your nearest convenience.

Kind Regards



Virus-free. [www.avast.com](http://www.avast.com)

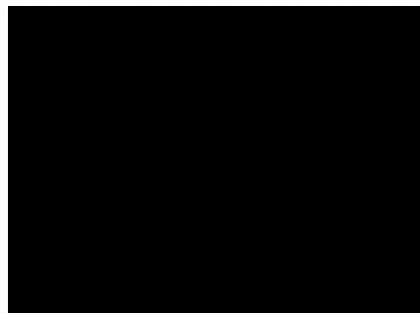


Current Plan for Brook Meadow



Revised Plan to remove our area of Land as it is not part of Brook Meadow





Planning Policy  
 Havant Borough Council  
 Civic Centre Road  
 Havant  
 Hants PO9 2AX

22nd May 2019

Dear Sir, Madam,

**EMSWORTH NEIGHBOURHOOD PLAN - COMMENTS.**

Thank you for the opportunity to comment on The Emsworth Neighbourhood Plan. This excellent, detailed document provides a realistic plan out to 2036 based on the views of local residents.

There are three areas that warrant particular mention.

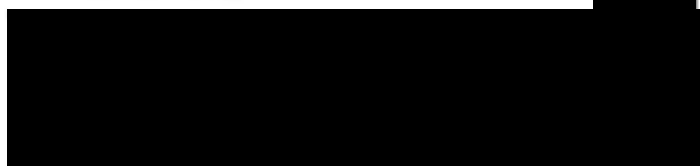
**Planning.** Whilst we accept that the government has to direct the numbers of house that are to be built, at long last local people are now able to have a say where the houses are to be built. A major step forward.

**Emsworth Roundabout/Cycling.** We fully support the proposed changes to the A259 and the roundabout. These are major forward looking improvements which will improve road safety for both cyclists and pedestrians.

**Emsworth Valley Corridor.** Policy C5 Site 11 proposes that this site becomes a new Designated Green Space. This proposal is long overdue. The field is a natural green corridor separating West Sussex from Hampshire. The footpath that runs across the site is an historic one, and was once the main path between Emsworth and Westbourne. It remains in constant use, with over 150 people using it every day. The footpath is also part of a national trail, the Sussex Border Path. Green space designation would ensure that the residents and wildlife of Emsworth and Westbourne will have an unbroken green space running from the northern edge of the town right down to the harbour.

We fully support all aspects of this excellent Neighbourhood Plan and strongly recommend that it is accepted without change.

Yours sincerely



[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 12 June 2019 10:39  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Emsworth Neighbourhood Plan Consultation

**Categories:** Emsworth Neighbourhood Plan

Dear [REDACTED]

Thank you for the opportunity to comment on the submission version of the Emsworth Neighbourhood Plan.

Southbourne Parish Council acknowledges the comment about the residents' social and economic links across the County boundary between Emsworth, Hermitage and Lumley but appreciates the rationale for the establishment of the Emsworth Neighbourhood Plan area (p9). Given the strength of those links across the County boundary Southbourne Parish Council hopes that it can work together with the Emsworth Forum to ensure views of Hermitage and Lumley are represented.

Although shown correctly on the map at p10, reference to Peter's Pond and Slipper Mill Pond at P11 should be noted as both being east of the County boundary in Southbourne Parish. It would be helpful however if the Emsworth Neighbourhood Plan also referred to the proposed Lumley Wildlife Corridor as the proximity of this corridor would strengthen the environmental aspects of your Plan.

Regards

[REDACTED]  
[REDACTED]  
Clerk to the Council  
[REDACTED]  
[REDACTED]

Southbourne Parish Council  
The Village Hall  
First Avenue  
Southbourne  
PO10 8HN



Southbourne Parish Council takes your data security seriously. Please take time to read our [General Privacy Notice](#).

---

**Sent:** 05 June 2019 17:38  
[REDACTED]

**Subject:** RE: Emsworth Neighbourhood Plan Consultation  
**Importance:** High

Dear [REDACTED],

Thank you for your email. I am sorry to hear that the consultation on the Emsworth Neighbourhood Plan has only just come to your attention. I can confirm that we did send a consultation email to you on 25<sup>th</sup> April 2019, using email address [REDACTED], which is the address I had for your organisation for neighbourhood planning matters. Apologies if this was the incorrect address to use.

In any case, we will be happy to receive the comments on the plan next week to give you time to consider them at your Parish Council meeting next Tuesday.

Best wishes

[REDACTED]  
Principal Planning Policy Officer

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

[REDACTED] | Team Phone: 023 9244 6539 | [REDACTED]  
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**From:** [REDACTED]  
**Sent:** 05 June 2019 17:17  
**To:** Planning Policy and Urban Design <[planning.design@havant.gov.uk](mailto:planning.design@havant.gov.uk)>

[REDACTED]  
**Subject:** Emsworth Neighbourhood Plan Consultation  
**Importance:** High

Dear Sir/Madam

Southbourne Parish Council has only just been informed that there is currently a Regulation 16 consultation on the Emsworth Neighbourhood Plan and I understand that the consultation ends this Friday, 7 June. As a neighbouring parish to Emsworth it is disappointing that the Parish Council was not formally advised about this consultation and I'd therefore be grateful if comments from the Parish Council can be submitted next week. The Parish Council meets next Tuesday 11 June and comments will be forwarded as soon as possible thereafter

Yours faithfully

[REDACTED]  
[REDACTED]  
[REDACTED]

Southbourne Parish Council  
The Village Hall  
First Avenue  
Southbourne  
PO10 8HN

**From:** Policy, Planning <Planning.Policy@southernwater.co.uk>  
**Sent:** 03 June 2019 15:26  
**To:** Planning Policy and Urban Design  
**Subject:** RE: Consultation on Emsworth Neighbourhood Plan

Dear Sir/Madam,

Thank you for your email inviting Southern Water to comment on the Emsworth Neighbourhood Plan. I confirm we have reviewed the document and are pleased to note our previous comments have been taken into account in this version of the Plan. We therefore have no further comments to make and look forward to being kept informed of the Plan's progress.

Yours faithfully,

  
Development Manager



  
[www.southernwater.co.uk](http://www.southernwater.co.uk)

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**From:** Planning Policy and Urban Design [mailto:planning.design@havant.gov.uk]  
**Sent:** 25 April 2019 15:10  
**Subject:** Consultation on Emsworth Neighbourhood Plan

Dear consultee,

This email advises that the Emsworth Neighbourhood Plan has been submitted to Havant Borough Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

The Emsworth Neighbourhood Plan has been prepared by the [Emsworth Neighbourhood Forum](#) on behalf of those who live and work in Emsworth. The plan sets out a vision for the area through to 2036 and sets out policies to guide the future of the area.

In accordance with Regulation 16, the Borough Council now **invites comments on the plan during a six-week period from 26 April 2019 to 7 June 2019.**

Documents can be viewed at the following locations:

- The Council's website at [www.havant.gov.uk](http://www.havant.gov.uk), search Emsworth Neighbourhood Plan or [follow this link](#)
- The Council's offices at Public Service Plaza, Civic Centre Road, Havant, PO9 2AX
- Emsworth Library at 23 High Street, Emsworth, PO10 7AQ

Any comments on the plan must be received before the end of the consultation period, and must be made in writing to [policy.design@havant.gov.uk](mailto:policy.design@havant.gov.uk) or to Planning Policy, Havant Borough Council, Public Service Plaza, Civic Centre Road, Havant, PO9 2AX.

Representations may include a request to be notified of the Council's decision on whether or not to 'make' the plan under Regulation 19. If 'made', the Neighbourhood Plan becomes part of the development plan for the area, and the policies contained within it may be used in the determination of planning applications.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 07 June 2019 22:37  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan - Regulation 16 Consultation  
**Attachments:** Emsworth N P Reg 16 6.2019.doc

Please find attached our comments on the Emsworth Neighbourhood Plan - Submission Version 2019 . We would be most grateful if you would acknowledge receipt.

[REDACTED]



## **Emsworth Neighbourhood Plan Submission Version 2019 Regulation 16 Consultation**

Thank you for providing the opportunity to comment on the above Plan.

We live in Southbourne Parish and are volunteers working on the current review of the Southbourne Parish Neighbourhood Plan 2015 but we are submitting these comments as private residents.

We have read the Emsworth Neighbourhood Plan (ENP) with interest not least because there are close connections between these adjoining areas. We note that this is acknowledged (ENP page 9) although we would point out that this is very much a two way flow with a number of facilities in Southbourne Parish being used regularly by Emsworth residents eg the Bourne Leisure Centre, the Southbourne Schools, the Marinas and our local harbourside walks.

We wish to make only two comments on the Plan content.

**Policy C5 Designated Green Spaces** includes Peter's Pond (part of) this being listed as site number 8. The area is shown in figure 6 (page 32) and in a more detailed map (page 35). This area lies outside the designated Emsworth Neighbourhood Plan area and therefore we would suggest that it should be removed from the Plan. It lies within Southbourne Parish/West Sussex and policies relating to it will be considered in the review of the Southbourne Neighbourhood Plan.

**Policy WF1 Public Enjoyment of the Waterfront.** The ENP does not have a Proposals Map which defines the "Waterfront" area, so it is assumed that Policy WF1 refers to the Waterfront Character Areas shown in figure 12 page 64. Policy WF1 cannot be applied to the majority of the areas identified as Millpond E (orange edge) and Historic Harbour and Anchorages (blue edge) because they lie outside the ENP Designated area, and within Southbourne Parish/West Sussex.

We hope that in due course there will be discussions with members of the Emsworth Forum about the emerging policies in the Southbourne Plan as we consider co-ordination to be essential. These discussions will provide the opportunity to liaise generally, but in particular in relation to policies for the Peters Pond and Waterfront areas currently referred to in ENP Policies C5 and WF1.



[REDACTED]

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**From:** [REDACTED]  
**Sent:** 14 May 2019 11:05  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

To HBC Policy Planning

I have been interested and supportive of the Emsworth Neighbourhood Plan since the formation of Emsworth Forum some years ago.

I am sure the Plan will provide an invaluable reference document for future planning decisions in the Emsworth ward area.

I know that it has resulted from lengthy consideration by a dedicated committee and the involvement of professional and public consultation. Its detailed content does reliably reflect the views of a significant proportion of the Emsworth community who have shown keen interest in the future welfare and environment of all residents.

[REDACTED] [REDACTED]



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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 23 May 2019 11:26  
**To:** Planning Policy and Urban Design  
**Subject:** Emsworth Neighbourhood Plan  
**Attachments:** Representations on Emsworth Neighbourhood Plan 23.5.19.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

My representations on the plan are contained in the attached Word document. Kindly acknowledge receipt.  
[REDACTED]

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## Representations on Emsworth Neighbourhood Plan.

My name is [REDACTED]


My representations are as follows:

- 1 Policy L1 b) –
  - (a) delete the words “for rent” at the end of this paragraph. “Affordable housing” is a defined term for the purposes of the NPPF and the mix of tenures anticipated therein should not be restricted.
  - (b) There is no reason to depart from the 30-40% figure contained in the Housing Needs Assessment and a figure of 40% is overly prescriptive.
  
- 2 Policy H3 –
  - (a) I do not agree that Emsworth Community Centre and 10 North Street are sufficiently worthy so as to exclude the possibility of redevelopment.
  - (b) The use of The Old Post Office should not be restricted to D1 use. The possible uses should include both those in classes A and B1.
  - (c) The inclusion of “Slipper Sailing Club” (properly “Emsworth Slipper Sailing Club”) and the adjoining Malthouse as being primarily for “public and community use” (per policy H3 b)) is incorrect. A private members’ club does not fall into use class D1 and the Malthouse is partly used, in accordance with existing consents, for commercial purposes. The inclusion of these buildings in this policy is inaccurate and should be removed.
  
- 3 Policy W1 a) and b)
  - (a) delete the words “as a visitor attraction and”. There is no justification in restricting possible employment opportunities by linking this to “visitors”.
  - (b) delete all the words in b) after “town centre” line 6. There is no relevance to employment having to create public access to the waterfront or to surrounding areas. The constraints anticipated by the first part of this paragraph are sufficient to ensure good design criteria.
  
- 4 Policy W3 a) and b)
  - (a) insert the words “business or” before the word “industrial” on line 2 of policy a).
  - (b) insert the word “unit” after the word “larger” on line 2 of policy b)
  - (c) in policy W3 d) after the word “frontage” on line 4 add the words “save where such uses are already in place”. This will make clear the welcome contribution that existing pubs have to the town.
  - (d) a key policy aim should be stated as being to attract a bank, building society or similar financial institution to the town. The disappearance of the three national banks from Emsworth in the

last few years has been the single most important cause of a reduction in daytime footfall.

5 Policy WF1 a) b) and c)

I disagree with the overall concept of and thinking behind these policies. There is sufficient public access already to all parts of Emsworth's waterfront. There are no constraints preventing such access and to impose a requirement to provide for further public access in all private development is unjustified.

  
23.5.2019

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 06 June 2019 10:25  
**To:** Planning Policy and Urban Design  
**Subject:** RE: FW: Consultation on Emsworth Neighbourhood Plan  
**Attachments:** 6 June 2019 Emsworth Neighbourhood Plan consultation.docx

Hi

Please find attached a comment from Westbourne Parish Council on the Emsworth Neighbourhood Plan.

Best wishes, [REDACTED]

[REDACTED]

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**From:** Planning Policy and Urban Design <planning.design@havant.gov.uk>  
**Sent:** 25 April 2019 15:09  
**Subject:** Consultation on Emsworth Neighbourhood Plan

Dear consultee,

This email advises that the Emsworth Neighbourhood Plan has been submitted to Havant Borough Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

The Emsworth Neighbourhood Plan has been prepared by the [Emsworth Neighbourhood Forum](#) on behalf of those who live and work in Emsworth. The plan sets out a vision for the area through to 2036 and sets out policies to guide the future of the area.

In accordance with Regulation 16, the Borough Council now **invites comments on the plan during a six-week period from 26 April 2019 to 7 June 2019.**

Documents can be viewed at the following locations:

- The Council's website at [www.havant.gov.uk](http://www.havant.gov.uk), search Emsworth Neighbourhood Plan or [follow this link](#)
- The Council's offices at Public Service Plaza, Civic Centre Road, Havant, PO9 2AX
- Emsworth Library at 23 High Street, Emsworth, PO10 7AQ

Any comments on the plan must be received before the end of the consultation period, and must be made in writing to [policy.design@havant.gov.uk](mailto:policy.design@havant.gov.uk) or to Planning Policy, Havant Borough Council, Public Service Plaza, Civic Centre Road, Havant, PO9 2AX.

Representations may include a request to be notified of the Council's decision on whether or not to 'make' the plan under Regulation 19. If 'made', the Neighbourhood Plan becomes part of the development plan for the area, and the policies contained within it may be used in the determination of planning applications.

Comments may also be made on the parallel consultation on an application by Emsworth Neighbourhood Forum to be re-designated as the 'qualifying body' for neighbourhood planning in the area. The current designation expires on 23 July 2019, and an application for designation for a further 5 years has been received by the Borough Council.



**Westbourne**  
Parish Council

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

By email to [policy.design@havant.gov.uk](mailto:policy.design@havant.gov.uk)

Dear Sir/Madam

### **Comments on the Emsworth Neighbourhood Plan**

I write on behalf of Westbourne Parish Council who would like to submit the following comments on the Emsworth Neighbourhood Plan as part of the public consultation.

The Parish Council supports the Plan, particularly in response to the following policies.

- Importance of Policy CS relating to local green spaces. The Emsworth Valley Corridor, space no. 11, is an important policy as it impacts upon Westbourne. There is increasing evidence of bio-diversity and the value of local habitat and wildlife along the corridor which provides a strong argument for the protection this vital space. The corridor is also supported by the South Downs National Park Authority. In recent times, salmon parr have been found in the River Ems and the corridor provides movement for species of protected bats.
- It is recommended that tranquillity should be included as a criterion for The Emsworth Valley Corridor.
- The Parish Council supports Hampshire Farm Meadows as a designated green space. Relates with policy L5: Avoiding Settlement Coalescence.
- The Emsworth Neighbourhood Plan needs to harmonise with Westbourne's Neighbourhood Plan, which has been considered by an independent examiner, as a neighbouring village on the West Sussex boarder.
- Policy W3 – change of Use Applications, which is designed to ensure the retention of current services. Emsworth is an identified service centre for Westbourne.

Yours faithfully

Councillor Richard Hitchcock  
Chairman of Westbourne Parish Council

*Address for correspondence:*

6 June 2019

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 07 June 2019 10:29  
**To:** Planning Policy and Urban Design  
**Subject:** Representation to Emsworth Neighbourhood Plan  
**Attachments:** HBH-LC Objection to neighbourhood plan 7-6-19.pdf

Dear Sir,

Please find attached my objection on a technical point of accuracy regarding Policy C5 Site 2's area of coverage. If I can be of any further assistance on this, I am very willing to help.

Yours faithfully,

[REDACTED]

[REDACTED]



Representation to Emsworth Neighbourhood Plan

Objection to Policy C5 (Local Green Spaces) Site 2 (Hollybank Woods)

6<sup>th</sup> June 2019

In general we support the Neighbourhood Plan but it has been brought to our attention that on a technical point Policy C5 Site 2 is improperly defined in the Plan.

Site 2 is designated as Hollybank Woods which is the large area of woodland leased to the Borough on a long lease by the Dimmock White Estate to be used as an amenity area.

The plan on page 34 of the Neighbourhood Plan not only covers the site as described above but also covers areas which are not part of 'Hollybank Woods'. These include the whole of Hurstbrook Cottage and White Lodge, a large part of the private grounds of Hollybank House, the section of access to the area of woodland (already excluded on the plan) owned by Hollybank Farm and a small amount of the field to the south of Hollybank House which forms part of the housing allocation H8.

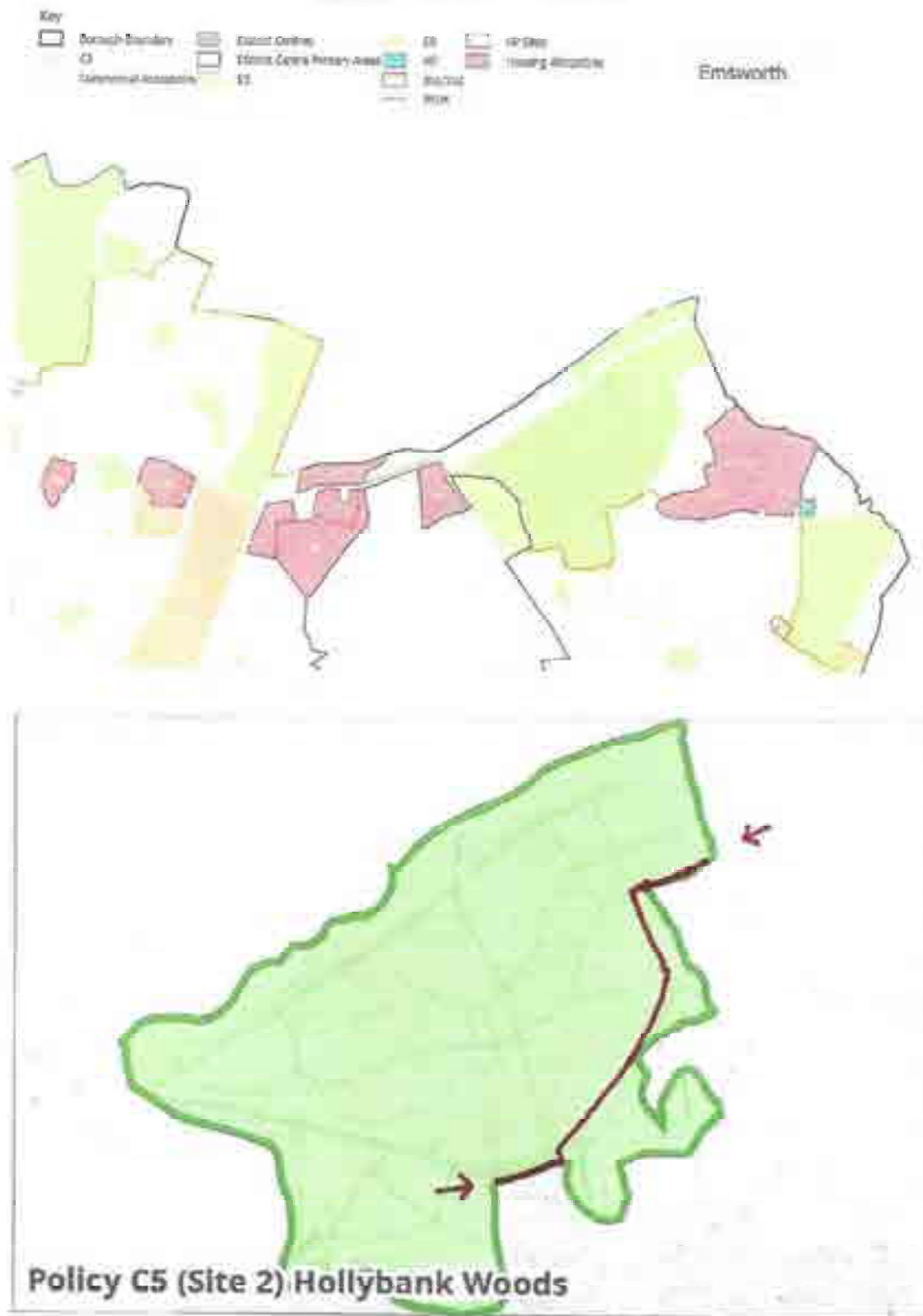
I have outlined in red what I believe to be the correct south east boundary of Hollybank Woods both on the attached plan as published on page 34 and also, more accurately, on a plan drawn up by Land and Partners showing the plan on page 34, overlaid with the emerging Havant Local Plan Policies Map for Emsworth. These plans are attached.

I believe that by amending the draft plan accordingly it will enable the Neighbourhood Plan to be in sync with the emerging Havant Local Plan Policies Map, and not in conflict with it.

I am happy to assist in any future discussions on this if it should be helpful.



Top: extract from proposed Policies Map for Emsworth, Havant Local Plan.  
 Bottom: extract from Emsworth Neighbourhood Plan showing proposed LGS at Hollybank Woods







LAND & PARTNERS

Overlay of the Emsworth Neighbourhood Plan Local Green Space Site 2  
with the emerging Havant Local Plan Policies Map for Emsworth

NTS



[REDACTED]

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**From:** Planning Policy and Urban Design  
**Sent:** 03 June 2019 11:39  
**To:** [REDACTED] ne  
**Subject:** FW: Emsworth Neighbourhood Plan

**Categories:** Emsworth Neighbourhood Plan

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[REDACTED]

**Sent:** 03 June 2019 11:16  
**To:** Planning Policy and Urban Design <planning.design@havant.gov.uk>  
[REDACTED]  
**Subject:** Emsworth Neighbourhood Plan

Dear Sir

**Emsworth Neighbourhood Plan**

I send you this e-mail to register my support for the Emsworth Neighbourhood Plan presented to you by the Emsworth Forum.

I approve the plan in general, it has been well thought out and has great potential. The only criticism is that on page 33 the block chart should in my opinion show the Emsworth Valley Corridor site as an area of recreation and tranquility.

Many people, dog walkers, ramblers, joggers and families walk through it every day (147 counted on 2nd May 2019).

I am relieved that at least for the moment the development application APP/18/00672 has been rejected.

Emsworth is a great place to live, but it will not be so if we build all over every bit of green space we have left.

Yours sincerely

[REDACTED]