

SHUV

South Hampshire's Unheard Voices

East Hoe Manor
East Hoe Road
Hambleton
Hampshire
PO7 4SZ

21st June 2006

Dear Mrs Morgan,

SHUV and the South Hampshire Sub-region

Please find attached the submission of the SHUV group from South Hampshire. SHUV stands for South Hampshire's Unheard Voices, and is a coalition of amenity and civic societies, parish councils, wildlife and environmental groups.

Our primary purpose was to raise awareness of the plan, which remains at a low level. We have been involved in three public meetings. The first was aimed at organisations from across South Hampshire and attracted about 40 people, all representing their own local groups. The second was aimed at residents living near the proposed Fareham SDA and attracted even more. A presentation was also made to the Winchester District Association of Parish Councils. We have secured ongoing media coverage, but are still conscious that many people in the sub-region are unaware of the transformation planned for their area.

Within three months of launching the coalition, our membership stands at 25 groups, with a total combined membership of thousands across South Hampshire. We think this shows that people are very concerned at the South East Plan proposals - once they find out what they are - and crucially the drivers behind them.

Secondly, we have banded together to share expertise and to prepare a consolidated response to the SE Plan draft. Our constituent groups will be putting in their own local comments, but the attached are concerns that are common to all of us, and are of relevance to the entire sub-region.

In view of our representation of such a wide range of local groups and their membership, we would ask that we have the opportunity to present more detailed evidence and argument to support our comments to the Inspectors at the Examination in Public when it discusses the South Hampshire sub-region.

Yours sincerely

Mrs Caroline Dibden
(on behalf of **SHUV**)

SHUV represents:

Bosmere 100 Society Havant and Waterlooville
Campaign to Protect Rural England (Hampshire)
Catherington Village Residents Association
Catisfield Village Association
East Hampshire Badger Group
Emsworth Residents Association
The Fareham Society
Funtley Village Association
Hampshire Greenfield Alliance
Gosport and Fareham Friends of the Earth
Green Party (South East)
Langstone Village Association
North Hazelton Residents Association
Parish Council Bramshaw
Parish Council Horndean
Parish Council Netley Marsh
Parish Council Rowlands Castle
Portchester Civic Society
Portchester Society
Portsmouth Society
Purbrook and Widley Area Residents Association
Romsey Society
Rowlands Castle Association
The Wickham Society
Wallington Village Community Association

SHUV is also being advised by The Empty Homes Agency and the Woodland Trust

Comments from SHUV (South Hampshire's Unheard Voices)

SHUV

Support: Section A paragraph 3.2 sustainable development

Support: Section A paragraph 3.4 climate change

Support: Section A paragraph 3.7 resource use (eg water and waste)

Section C: Summary: The plan identifies the some of the problems the faced by the region, but it doesn't explain the steps that will need to be taken to solve them, and as discussed the proposals for overdevelopment will in fact worsen them.

Section D1: Full response

The Sustainability Appraisal commissioned by the regional assembly concludes that if the South East Plan goes ahead as proposed, it will lead to an increase in resource consumption, increased waste, increased transport emissions, increased water consumption, a reduction in the range and quantity of wildlife and still fail to solve the problem of providing sufficient affordable housing.

SHUV

Oppose: Section B paragraph 7.4.2

Oppose: Section D2 paragraph 1.1 and paragraph 1.181

Oppose: Section E1 paragraph 2.1 and 2.17

Section C: Summary: We are concerned at the emphasis placed on the Gross Value Added economic target.

Economic growth should not be a goal in its own right. The primary goal should be the well-being of society and the conservation of the resources and environment that sustain us. We argue that an index, such as the ISEW, that measures changes in these things should replace the GVA target.

Section D1: Full response

Firstly, the GVA target is misleading. The public might assume that boosting the figure will mean more personal wealth for them. However, this might only be the case if it was an increase in GVA per person. In fact, one of the ways that PUSH particularly wishes to boost GVA, according to a recent newspaper interview with one of its members, is to increase the population of the sub-region. Therefore the GVA per person could be unaffected or even fall.

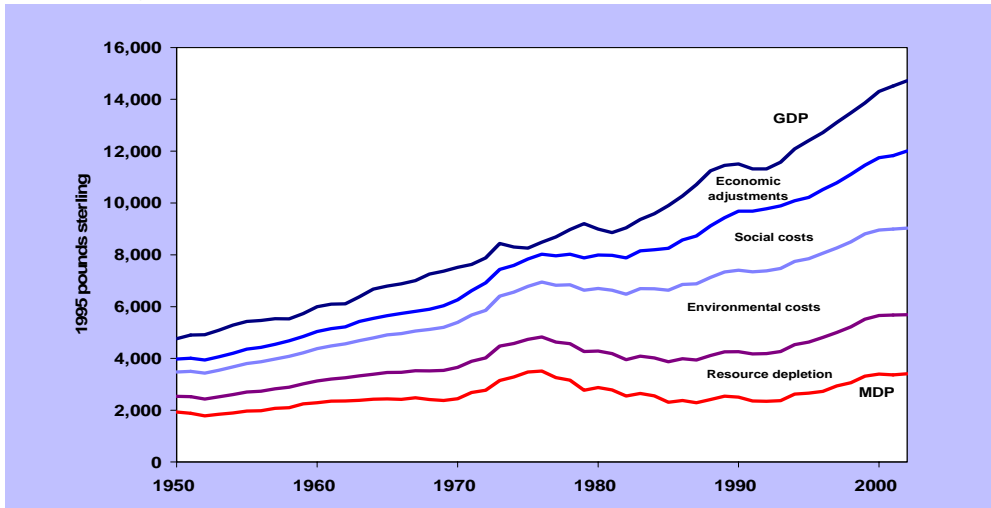
However, we have a more fundamental problem with GVA. Official figures show that in the period 1997-2003 our region had the fastest growth in Gross Value Added (GVA) of any in the UK. It was one of only two regions (the other being London) that were net contributors to the Exchequer. However, we contend that above a certain threshold of income, greater wealth does not bring a commensurate increase in well-being.

UK Sustainable Development Commissioner Prof Tim Jackson, of the University of Surrey, has compared the increase in GDP over the past 50 years with a number of other measures, including many that have a direct bearing on our quality of life. The graphs below are taken from a submission to SEEDA and can be found at:

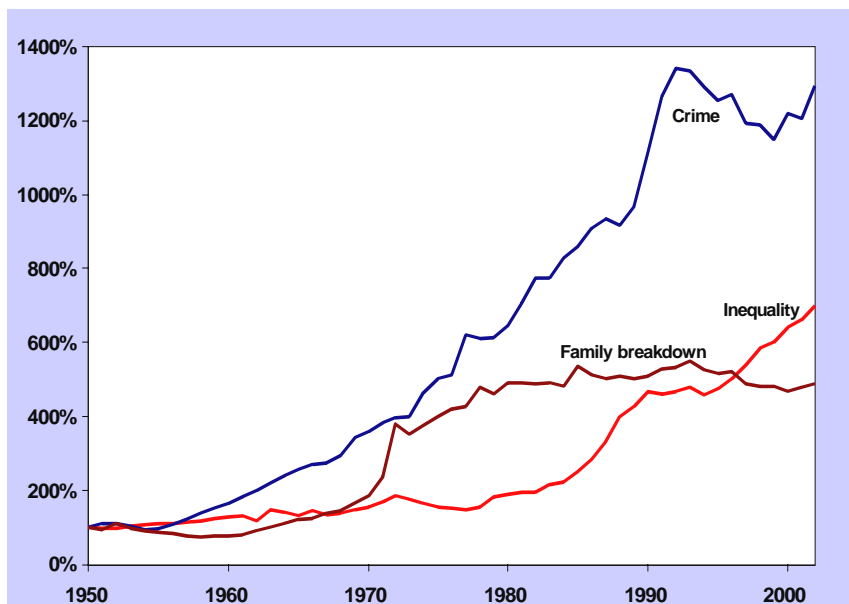
http://www.seeda.co.uk/news_&_events/event_reports/prosperity_&_sustainability/docs/TimJackson_files/frame.htm#slide0020.htm

The graphs are reproduced below.

Measuring economic impacts of economic development



Social trends over same period



So, despite living in the UK region with the best economic performance, people are no more content in 2006 than they were 30 years ago, when the South East's economic output was half what it is today.

We note that in figure A2 (Section A) a MORI poll shows that 43% of residents questioned considered they had a very good quality of life. However, assessment of quality of life is relative. The SE has undergone a huge influx of people moving from London. Quality of life may be perceived to be better in the SE than in London. Indeed that may be one reason for the exodus of older people and families from the capitol. However, that does not mean that long-term residents of the SE do not consider that quality of life is decreasing.

We expect the desire for a better quality of life to be a factor behind the net movement of SE residents to other regions where development pressure is less. We know from our own conversations with people that over-development with its concomitant loss of green space and increase in traffic congestion was one of the most commonly cited concerns of residents.

If greater prosperity does not bring greater happiness - but instead heralds greater inequalities between rich and poor, higher carbon emissions, resource depletion, congestion and pollution (as shown by the graphs) - then why rely on such crude measures as GVA or GDP to evaluate success?

We believe a measure such as the Index of Sustainable and Environmental Welfare (ISEW) would provide a more appropriate basket of indicators with which to assess the state of the region.

There are some key differences between ISEW, as a measure of sustainable economic welfare, and GVA/GDP, as a measure of production. Most notably ISEW:

- Does not include spending to offset social and environmental costs. GVA/GDP includes the spending on alleviating breathing difficulties which may be exacerbated by traffic fumes or the costs of removing pollutants from tap water.
- Accounts for longer-term environmental damage and the depreciation of natural capital.
- Includes the net formation of human capital (i.e. investment).
- Includes changes in the distribution of income, reflecting the fact that an additional pound in the pocket means more to the poor than to the rich.
- Includes a value for household labour.

An alternative option would be to measure GVA growth per capita, which is surely more relevant to the well-being of the region than overall GVA growth. This former implies higher average skill levels and household incomes, the latter could just depend on how many people are imported to Hampshire.

Finally, the over-development of the SE is actually counter-productive if GVA growth is your goal. The Draft Regional Economic Strategy 2006-2016 (page 26) states that perceived quality of life in the region is one of factors that makes it attractive to business. The SE Plan will severely undermine this attractiveness.

SHUV

Oppose: Section C paragraph 4.6.5

Oppose: Section D2 paragraph 1.1 and 1.23iii

Section C: Summary: Housing development to provide homes for workers moving into the region will not increase the income of deprived communities within our area.

Section D1: Full response

The SE Plan is - in part - designed to provide homes for workers moving into the region so that the SE can reach its GVA target.

Section E1 South Hampshire paragraph 2.31 states

- 2.31 There is a requirement for new housing in South Hampshire to cater for demographic changes (eg more one and two person households and longer life expectancy). There is also a need to provide sufficient new homes for workers helping the local economy to grow. The strategy is to provide 80,000 dwellings during the 20 years to 2026. The type of properties required in each district area should be informed by housing market assessments.

We cannot see how this will benefit people living in the deprived communities Rowner, Gosport, Leigh Park, Wecock Farm, and particular districts of Portsmouth.

Section D2, para 1.23iii of the SE Plan states that moving into the region workers are likely to be better qualified than the workers already here. Therefore, even if the unemployed are successfully upskilled, they will have competition to attain the better-paid jobs that could lead to greater prosperity.

A less optimistic outlook is that they will take on lower-paid jobs that provide services to those with higher paid jobs, leading to the "hourglass economy" described in the introduction to the Review of the Regional Economic Strategy 2006-2016. This has a large number of high-earners (the top of the hourglass), few middle-income earners (the waist of the hourglass) and a large number of low-income earners (the base of the hour glass) providing services for those at the top. We can't see how this kind of economy will benefit reduce disparities within the region - one of the goals of the SE Plan.

There is of course an even less optimistic outlook - given that the "trickle-down" economic model has been discredited. That pessimistic outlook is that the unemployed will remain so.

Encouraging workers to move to south Hampshire from other regions (section E1 2.31) increases housing demand in an area that has already seen a great deal of development. Our impression is that most people would say there has been too much. Of course, the houses sold by private developers or rented out by private landlords will go to the highest bidder. Attracting workers to this region - particularly as they are likely to be better qualified - might lead to indigenous workers being out-bid for the new homes that become available. So people could see a further reduction in their quality of life due to over-development for little gain in housing terms.

Last but by no means least; we would imagine that the people moving to the SE for work would prefer to remain in their own areas if there was sufficient work and prospects. This country needs a more even spread of economic activity. This would benefit both people and the environment. Instead we have an attempt to shoehorn people and economic activity into one region while housing and facilities lie under-used in other areas. The SE Plan seems to us to be admittance by Government that it is unable to steer the economy of this country.

SHUV

Oppose: Section C 3.4.1 vi

Section C: Summary: We do not support the proposal for significant housing and economic development in South Hampshire.

Section D1: Full response

This appears to refer to the two Strategic Development Areas (SDA) proposed for South Hampshire. We will keep our comments to the north of Fareham SDA. Our opposition to this will be given more fully in our response to the south Hampshire section of the SE Plan. However, we would like to mention a couple of objections here:

The SDA is in an important gap that defines the communities of Fareham and Wickham. It is designated as an Area of Special Landscape Quality within the local plan. We consider that it is very likely that the people many living there will have to travel out of the new town to work and since the main transport link is the motorway, then the development will encourage car travel. It therefore does not meet the government's sequential test for development,

which prioritises previously-developed sites over greenfield sites and sites with good public transport links over those with none.

SHUV

Oppose: Section D3 paragraph 1.8

Section C: Summary: More emphasis needs to be given on bringing empty properties into use.

Section D1: Full response

This will reduce the amount of new build required. We will give information on the local situation in our response to the south Hampshire situation plans.

SHUV

Oppose: Section D3 Policy H1 Housing Provision

Oppose: Section E1 Policy SH12 Scale and Location of Development

Section C1: Summary: The South Hampshire sub-region allocation, and corresponding district allocation in Policy H1, is based on an economic target of 3.5% GVA growth which even Hampshire County Council does not feel is achievable. We support using the ISEW (Index of Sustainable and Environmental Welfare) as a measure of appropriate growth.

The amount of available previously developed land (excluding that of ecological merit) has been underestimated.

The overall figure is not based on local need or population predictions, and at least 7,000 dwellings, and up to 10,000 dwellings, should be held back as a strategic reserve pending the outcome of future previously-developed land capacity and local demand studies. There is no mechanism in the Policy for reallocation within the sub-region should, for example, Southampton, be able to take more of the sub-regional allocation.

Furthermore, the intended locations and SDAs will not lead to an improvement in deprivation in the areas which need it most. The SDA at Fareham has not been the subject of any comparative study, and other locations have not been properly evaluated or been the subject of public debate.

The allocations to the southern parishes of East Hampshire and Winchester are not based on local need, nor are they urban in nature, and they should be reduced. Additionally we believe that the new housing figures do not take fully into account the possibility to utilise empty homes within certain districts.

Section D1: Full Response

The South Hampshire Sub-region is the smallest sub-region at only 659 sq km, but is taking 14% of the entire regional allocation with 80,000. This is based on PUSH assumptions of growth at 3.5% GVA, but we feel that a more appropriate measure would be the ISEW (Index of Sustainable and Environmental Welfare) as discussed. If however, a GVA target is to be used, it would be more appropriate to use a GVA per capita target, as this will be linked to upskilling and regeneration. Hampshire County Council proposes that a sensible aspiration of GVA growth rising to 3.25% by 2021-26, is more likely to be achievable. We suggest that the figure of 80,000 dwellings has been allocated to South Hampshire not based on local

need and the requirement for urban renaissance and regeneration, but simply to fulfil a numbers requirement.

Population estimates for South Hampshire taken from the PUSH submission and checked in the Profile of Hampshire 2005 (from Hampshire County Council website) confirm that over the 20 year plan period the population will increase by only 70,000, of which 60,000 is due to in-migration. Firstly, we fail to see why 70,000 people (even including a back-log of 6,000 in need) should require 80,000 dwellings. That is more than 1 dwelling for every new inhabitant. The Hampshire wide average is over 2.4 people per dwelling, so even a conservative estimate would require only around 33,000 new dwellings. Unbelievably the population predictions actually expect one Hampshire district to have lost population by 2026 compared to 2001 - Havant. This loss is expected to be 3,200 persons, or 2.8%. The other authorities in the sub-region with expected large gains, all above 10%, are Test Valley, Winchester, and Gosport.

Secondly, we have been repeatedly assured that this housing is needed to provide for local need. For example, a consultation document was called "Where Shall We Live?" and government ministers have spoken on the radio and TV about the need to provide homes. Yet they do not explain the element of in-migration which is being encouraged to supposedly boost the economy while other areas of the country are becoming de-populated.

In fact, recent revisions to the level of household formation (Bramley (2005) drawing on DETR (1999); ODPM Housing Statistics) have revised downwards the expected new household formation in the South East.

Since there is currently almost full employment it is not clear why, if the population change is to be only minimal as predicted, there is a need for such vast increase in employment floorspace alongside the proposed housing. If the justification is that the current employment land is unsuitable, then it would follow that this surplus land could be redeveloped for housing thus increasing the supply of brownfield land and decreasing the need for the current high greenfield allocations.

The PUSH submission is based on a target that 38,000- 39,000 dwellings of the 80,000 can be accommodated on brownfield sites (under 49%). Current brownfield development in Hampshire is running at 71%, and there is no reason to assume that this level cannot be maintained for the foreseeable future. In any event, maintaining a high level of ongoing brownfield is clearly an aspiration that should be supported, except in those circumstances where a brownfield site is of exceptional ecological merit.

Should a level of 70% be maintained, then 56,000 dwellings could be achieved on previously developed land. This could result in the deletion of the Fareham SDA, the lowering of targets in the southern parishes of East Hampshire, and a reduction in the additional figures allocated at West of Waterlooville. Some of the councils that make up PUSH itself were of the opinion that the Urban Capacity figure had been underestimated. Eastleigh felt a figure nearer 50,000 was more appropriate, and Winchester City Council felt it should be raised to at least 55,000 dwellings. We do not feel that enough consultation or effort has been put into evaluation of these proposals, and since this is of critical importance in the likely allocation of sites, it should merit considerable further investigation. We would urge that we do not wish to see a repeat of the mistakes of the past when appropriate windfall capacity was vastly underestimated leading to large greenfield MDAs being specified in the Hampshire County Structure Plan, which have ultimately turned out to be either unnecessary or only needed on a reduced scale. A reserve sites policy provides some protection against this. (The member

groups that make up SHUV are more than happy to discuss urban capacity in their specific areas of expertise).

The allocation of 1,200 dwellings to the southern parishes in East Hampshire is not based on local need, and would have a detrimental impact on the setting of the designated South Downs National Park in contradiction of Section 85 of the Countryside and Rights of Way Act.

The allocation of 6,739 dwellings to the southern parishes of Winchester is not based on local need, but on a purely convenient extension to the West of Waterlooville MDA, and as discussed below under Section E1 Policy SH1 this will have an injurious effect on the deprived localities in neighbouring Leigh Park, Havant.

Whilst we would wish to see a mechanism for reallocation within the sub-region, we would not wish to see any more pressure put into other areas of Hampshire (except perhaps Andover), and in particular no reallocation should be made to the area of the designated South Downs National Park.

Additionally we believe that the new housing figures to do take fully into account the opportunity to utilise empty homes within certain districts. For example, in Hampshire County Council's Profile of Hampshire 2005, table 5.3, it states that Gosport has 12 privately-owned homes that have been unoccupied for more than six months. Yet one of our members knows of four in this category within a quarter of a mile radius of her home. It seems unlikely that one quarter of all homes in this category should be located in such a small area. We have been advised by the Empty Homes Agency that there is variation in practice between local authorities. Therefore, we are collating evidence on this across the sub-region. Here is a questionnaire that we have sent to all the councils in the PUSH sub-region. We would like the opportunity to present our findings at the EIP.

1. Does the local authority have a clear strategic commitment to tackle and reduce numbers of empty homes in its area?
2. Does the local authority have clear and challenging targets for returning empty homes to use? Are the targets proportional to the scale of the problem?
3. Are targets met and is there evidence of improvement and a reducing empty homes problem?
4. Does the local authority have an evidence-based understanding of what the problem is? Numbers and whereabouts of empty properties? How long empty? Degree of disrepair? Who owns them? Why they are empty?
5. Does the local authority have the ability to use council tax data to inform its work on empty homes and identify owners of empty homes?
6. Does the local authority have a dedicated officer who takes a lead on empty property issues? What support skills training and development is offered to the officer to help them undertake this role?
7. Does the local authority have a properly funded private housing assistance policy with the flexibility to offer financial and other assistance to owners of empty homes?
8. Does the local authority have a well-marketed system whereby the public can report empty homes?
9. Does the local authority offer assistance to prospective owner-occupiers and developers seeking to buy empty homes?
10. Does the local authority effectively publicise and market its work on empty homes?

11. Does the local authority regularly communicate with owners of empty homes? Does the communication comprise face-to-face meetings?
 12. Is the local authorities work on empty homes delivered by a genuine multi agency approach?
 13. Do housing providers (private and social sectors) contribute to the local authorities empty homes work?
 14. Does the local authority provide a private sector leasing or other property management service that provides a management solution for owners of empty homes?
 15. Does the local authority work in partnership with neighbouring local authorities on empty homes?
 16. Does the local authority have a private sector housing enforcement policy with a commitment if all else fails to use enforcement to bring empty properties back into use?
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SHUV

Section D3 'Housing' - Policy H5

Section C: Summary: The policy should make provision for wildlife and sustainable urban drainage.

Section D1: Full response: Housing, wildlife and water conservation: the proposed amount of building (housing and commercial) means that vast areas will be covered in concrete or tarmac. It must be remembered that wildlife is not restricted to wildlife reserves, it is found throughout the wider countryside and in our towns and cities. In conjunction with other comments on the lack of environmental sustainability of the Plan, the proposed amount of building is an added nail in the coffin of local wildlife.

This is particularly crucial at a time when we know that wildlife-friendly gardens or communal areas are of more value for wildlife than is sterile farmland. Not only can private and communal gardens provide food and shelter for a huge (and essential) range of plants, insects, birds and mammals but they can form small wildlife corridors between isolated areas of open green space in cities. As Hampshire Wildlife Trust points out, we can also benefit from the extra interest that wildlife brings to the garden.

Secondly, where are the plans for capturing the water that will be lost through run-off from the tarmac and concrete with which the ground will be mostly covered? Development plans must include communal areas planted with native plants and managed for wildlife, and drives and paths should use grassed concrete paving that allows water to drain through.

Section D2: Add: Development plans must include communal areas planted with native plants and managed for wildlife, and drives and paths should use grassed concrete paving that allows water to drain through.

SHUV

Oppose Section D3 'Housing' - Policy H7 point (v)

Section C: Summary: Point (v): replacing larger dwellings with high-density flats – where there were wildlife-friendly areas around such areas, has had disastrous consequences for wildlife. Such a policy must only be pursued with full consultation with wildlife protection bodies and with provision to include communal areas planted with native plants and managed for wildlife, with drives and paths using grassed concrete paving that allows water to drain through.

Section D2: Insert: "Replacement of larger dwellings with high-density flats will only be pursued with full consultation with wildlife protection bodies and with provision to include

communal areas planted with native plants and managed for wildlife, with drives and paths using grassed concrete paving that allows water to drain through."

SHUV

Oppose: Section E1 South Hampshire Paragraph 1.4 and paragraph 2.14

Section C: Summary: The vision for South Hampshire is purely based on economic growth. There is no mention of quality of life relying on clean land, water and air, productive soils, natural resources, and also distinctive and inspirational landscapes, wildlife, vibrant communities, open spaces and a healthy well managed countryside. The vision must be altered to accommodate these issues.

Section D1: Full response

The guide "Environmental Quality in Spatial Planning" produced by the Countryside Agency, English Heritage, English Nature and the Environment Agency, makes it clear how planning authorities might achieve high standards of environmental quality in spatial planning. Development should be sustainable in both built form and location; should respect the ability of the environment to accommodate change; should avoid damage to and enhance the environmental resource; should reduce risk to the environment; should respect local distinctiveness and sense of place; should reflect local needs and provide local benefits. The South Hampshire vision is not only lacking these statements, but clearly violates them in numerous ways. The numbers and locations proposed are unsustainable; the environment will clearly be unable to absorb this level and speed of development; the environmental resources such as water and waste are clearly put under threat; the Solent itself has not been mentioned in the plan; a Solent city with minimal gaps does not respect local distinctiveness and a community's sense of place; and as discussed later the plans do not provide for local needs where the need is greatest.

The goal of the South Hampshire plan should be to improve people's quality of life of people living and to work towards living within environmental limits. Anecdotal experience shows that this is what primarily concerns people - not a lack of jobs or a lower economic growth rate than some parts of the SE.

SHUV

Oppose: Section E1 paragraph 2.19 employment growth

Section C: Summary: What is the justification for creating jobs for which we do not have workers, according to other parts of the plan? This is unfair to other regions of the UK which have the workers, but no jobs.

SHUV

Oppose: Section E1 Policy SH1 Overall Strategy

Section C: Summary: The overall strategy is well meaning, but the district allocation as drafted will not result in the regeneration of the most needy wards in the sub-region. The task of urban regeneration must be more proactive and less reactive by the local planning authorities. Cities should be the subject of master plans avoiding the tendency for piecemeal development, with a corresponding lack of coherent infrastructure and facilities improvement. Any greenfield development should be PRECEDED by regeneration of deprived areas, and PRECEDED by appropriate infrastructure improvements.

Section D1: Full response

South Hampshire has a number of centres of severe deprivation in terms of housing quality, Rowner in Gosport, Leigh Park in Havant to name the best known. The table (3.2) below is taken from the 2005 Profile of Hampshire. Fourteen of the twenty areas in Hampshire with the highest scores on the index are all within wards that constitute the Leigh Park area of Havant (Warren Park, Barncroft, Bondfields and Battins).

Table 3.2 Index of Multiple Deprivation 2004 - Hampshire's Twenty Most Deprived Areas

| Rank | SOA code | Within ward District Rank |
|------|----------|------------------------------------|
| 1 | 01022905 | Battins Havant |
| 2 | 01022967 | Warren Park Havant |
| 3 | 01022903 | Battins Havant |
| 4 | 01022933 | Hart Plain Havant |
| 5 | 01022917 | Bondfields Havant |
| 6 | 01022906 | Battins Havant |
| 7 | 01022970 | Warren Park Havant |
| 8 | 01022915 | Bondfields Havant |
| 9 | 01022934 | Hart Plain Havant |
| 10 | 01022901 | Barncroft Havant |
| 11 | 01022900 | Barncroft Havant |
| 12 | 01022902 | Barncroft Havant |
| 13 | 01022968 | Warren Park Havant |
| 14 | 01022966 | Warren Park Havant |
| 15 | 01022822 | Grange Gosport |
| 16 | 01023029 | Holbury & N. New Forest Blackfield |
| 17 | 01022969 | Warren Park Havant |
| 18 | 01022913 | Bondfields Havant |
| 19 | 01022844 | Town Gosport |
| 20 | 01023126 | North Town Rushmoor |

See <http://www.hants.gov.uk/business/econdepriv.html> for a summary for Portsmouth and Southampton.

There are numerous incidences of boarded up derelict dwellings and there are underused and unsafe public places. However, the worst deprivation is not found in the social rented sector of these estates, but in the poor owner occupiers. The study Profile of Hampshire showed that Gosport was well below the national average in its symbols of success measure and only 8% so-called wealthy achievers. The highest crime rates in Hampshire are in Gosport and Havant, with proportion of violent crime more than double that of the rural districts. The two districts in the county having higher than the national proportion of people with poor basic skills are Gosport and Havant. The same is true for the two unitary authorities, Southampton and Portsmouth.

We maintain that the residents of Rowner in Gosport are not going to be helped by the building of the SDA north of Fareham, there will no improvement in their infrastructure and facilities. Those who can leave, will leave, leading to increased abandonment and hardship on the estate. True urban renaissance would look to redevelop this area, which although high rise in places, is actually low density overall, allowing a major improvement in transport links along the currently highly congested A32 down the Gosport peninsula. There are proposals for other sites in Fareham which might be more beneficial to this desperately needy area than the suggested SDA to the north of the M27. These have not been aired in a

public forum, nor been the subject of comparative cost/benefit analysis, nor been the subject of environmental impact assessments.

The residents of Leigh Park in Havant are not going to see any improvement in their facilities or infrastructure as a result of the development West of Waterlooville. It will only serve to suck the already fragile services out of Leigh Park and into the larger new settlement. This was recognised by Havant Borough Council who themselves asked for a lower allocation to Waterlooville, in order to prioritise the regeneration of Leigh Park. This allocation has been driven by an approach which only takes the easy option. It is of course more difficult to resolve a 50 year back-log of deprivation, stretching back to the building of Leigh Park after the war to house the underprivileged of Portsmouth. However, it is the proper course of action if we are really to meet the social aspirations and goals of the SE Plan. The allocation at West of Waterlooville (in Winchester District) should be reduced, and replaced by a proper "road-map" for improvement at Leigh Park. The population increase predictions for Winchester are likely to be as a result of proposed building in Waterlooville. Investment into Waterlooville rather than into the regeneration of the more urban, and thus more complicated, Havant, will thus lead to further decline. This is planning turned on its head, i.e. build more houses, so the population increases, so build more houses. Real regeneration should focus on meeting a social requirement.

SHUV

Oppose: Section E1 Policy SH2 Strategic Development Areas

Section C: Summary: Any greenfield development in the Strategic Development Areas should be PRECEDED by regeneration of deprived areas, and PRECEDED by appropriate infrastructure improvements. The allocation to Strategic Development Areas as drafted will not result in the regeneration of the neediest wards in the sub-region. It is not clear why the Fareham SDA must be 10,000 dwellings in size, no justification has been provided. The statement on preventing coalescence of the SDAs with neighbouring settlements needs clarification in the guidelines for the size of the areas of open land required.

Section D1: Full response

The proposed SDA does not meet the government's sequential test for development which prioritises previously-developed sites over greenfield sites and sites with good public transport links over those with none. Since there are no other options for public transport the people who will be living there will have to travel out of the new town using the motorway, and thus the development will encourage car travel. Even with some employment sites within the "new town" commuting out and in will still put huge pressure on an already congested network. A proper (and public) comparison has not been made on the relative suitability of any alternative options; other potential sites or urban extensions may be located closer to already sustainable centres and existing transport links (albeit which may require improvement). This is in contradiction of all environmental assessment suggestions.

Meetings were held with the Fareham Society, other amenity groups and the public (at their own instigation) only after decisions on the Fareham SDA had already been made. There has been no real community involvement to date and the alternative sites and the associated potential infrastructure improvements to the congested A32 have not been put to public debate. This is not in accordance with current guidance requiring full community participation. No justification has been provided for the size of the Fareham SDA at 10,000 dwellings, and it was originally proposed at 8,000 dwellings. The change seems arbitrary. If the justification were that this is a minimum size to qualify for sufficient infrastructure to be built, it would follow that both the Hedge End and Fareham SDAs should be of equal size.

The proposed location for the Fareham SDA is in an Area of Special Landscape Quality, and would set an undesirable precedent in stretching the urban footprint north of the M27. At present the M27 marks a boundary between urban development to the south and the rural hinterland to the north. The gap which exists currently between Fareham and Wickham is critical to separate the townscape of Fareham, with all its associated urban facilities from the essentially rural small market Meon Valley town of Wickham. To fit 10,000 dwellings into this gap is already threatening the identity of these two very different areas. It is not clear from Policy SH2 how wide the “areas of open land” to prevent coalescence should be. This could be as narrow as one field. It is critical that they are significant enough to prevent any visual connection between the settlements.

If Policy SH2 were actually to be followed as stated i.e the impact of the SDAs “will be assessed in relation to their effect on surrounding districts and their sustainability”, then the SDA would not be proposed in this location at all.

SHUV

Oppose: Section E1 Policy SH3 Sub-Regional Gaps

Paragraph 2.9

Paragraph 1.1

Oppose: Section C Policy CC10 Gaps

Section C: Summary: We object to the exclusion of the Denmead and Waterlooville, and the Southampton/Chilworth and North Baddesley gaps in paragraph 2.9., as suggested by PUSH. We further ask that a Clanfield/Catherington and Horndean gap should be added. We object to the criteria in Policy CC10b which only allows for strategic gaps to be between settlements of 10,000 dwellings apiece. We propose that only one of the settlements need be of the order of 10,000 dwellings. Therefore it follows that all the gaps in paragraph 2.9 with the additions of Denmead and Waterlooville, Southampton and Chilworth, and Clanfield and Horndean should be included as Sub-regional gaps in Policy SH3. This is critical in order to preserve local distinctiveness and community spirit. A buffer zone should be added to prevent negative impacts along the southern boundary of the designated South Downs National Park, or rural parishes removed from the sub-region.

Section D1: Full response

As the SE Plan states in paragraph 2.7, gaps of undeveloped land help break up an otherwise almost continuous built-up area, well on its way to becoming the dreaded “Solent City”. They are critical in maintaining community spirit and the separate identity of settlements. However, it is just as, if not more, important to maintain a gap between a large settlement (greater than 10,000 dwellings) and a smaller village or town. Without that provision, there is no protection to prevent the coalescence of every smaller satellite into the larger urban footprint.

In order to prevent significant negative impacts on the southern margin of the designated South Downs National Park, and to limit cross-border effects, a buffer zone should be considered to limit the intensity of development in the following area: Clanfield, Horndean, Rowlands Castle, Denmead, Newtown, Wickham, Swanmore, Bishops Waltham, Durley and Colden Common. Alternatively these essentially rural parishes should be removed from the South Hampshire sub-region (precedent for this has been set in the Western Corridor part of northern Hampshire, where several parishes were removed from the draft boundary of the

sub-region). The local authorities have a statutory duty to conserve and enhance the designated National Park.

SHUV

Oppose: Section E1 Policy SH4 Implementation of Development Plans

Section C: Summary: The people of South Hampshire should have some input into the implementation of this plan, which will have such a drastic effect on their home. This should be through the democratic process. However, PUSH has so far failed to engage with the public and this should be made a requirement.

Section D1: Full response:

Very few people in South Hampshire have heard of PUSH. Its meetings, minutes and agendas have not been made public. Although leaflets have been produced, the public has had little opportunity to question those who are responsible for the sub-region's plans.

Section D2: Revised wording:

Add: "This agency will be publicly accountable through PUSH, which will seek to engage the public by opening its meetings, agendas and minutes to the public and by holding and publicising a series of public meetings so that people can question the leadership of PUSH."

SHUV

Oppose: Section E1 Policy SH5 Plan, Monitor and Manage

Oppose: Section E1 Paragraphs 2.6 and 2.12

Section C: Summary: Any greenfield development should be PRECEDED by appropriate regeneration of deprived areas. There is not a rigorous enough mechanism in Policy SH5 or in Paragraph 2.6 to allow for the reallocation within districts of the sub-region should urban capacity and windfall sites exceed expectations such as has happened in the region over the last plan period. There should be a mechanism for reserve sites should the range of monitoring indicators show that the housing is no longer required since circumstances can change. Policy SH5 should include the provision of reserve allocation, such as has worked well in the current Hampshire County Structure Plan. At least 7,000 dwellings and it could be argued at least 10,000 should be held in a reserve capacity, until need has been demonstrated.

Section D1: Full response

There should clearly be an additional policy such as the Hampshire County Council H4 monitoring policy which annually monitors completions throughout the county, and releases allocations should local need be demonstrated. There should be an additional policy for reserve sites in the district allocations, and in particular the Fareham SDA and the additional allocation to West of Waterlooville should be reserve allocations. Circumstances are highly likely to change over the 20- year plan period, for example house prices and affordability can be the subject of worldwide boom/recession, and are not simply based on local supply provisions.

Further, Southampton city councillors have informed us that it is likely that Southampton is likely to be able to take additional capacity from the other districts. Additionally, there should be a policy which removes sites from the plan at the end of the period if they have not been required, so as to avoid planning blight, and to allow for future improvements in city centre regeneration that may prove less difficult under future more visionary legislation.

Paragraph 2.6 states that the rate of development in each SDA will depend on infrastructure provision, and that if more urban brownfield sites become available then the SDA development may fall after the plan period in 2026. This would argue for a reserve site policy such as already exists in Hampshire. This makes no allowance for circumstances to change, there should be no automatic assumption that the allocations should be carried forward into any subsequent plan, and there should be no allocations after the end of the plan period. Should the rate of windfall supply exceed expectations, the SDAs and West of Waterlooville, should be removed from the plan. Paragraph 2.12 also states that releasing major greenfield sites may undermine urban regeneration. We would argue that even allocating major greenfield sites can have a similar damaging impact, and that this can be mitigated by holding them in reserve, pending that regeneration taking place first.

SHUV

Support with Comment: Section E1 Policy SH9 Skills

Section C: Summary: We support the motives of the programme to improve the local skills levels, but with the caveat that building new towns is likely to undermine this noble objective, as the new facilities will be concentrated in the areas that are not in need of most improvement. This policy does not rely on the building of 80,000 dwellings.

Section D1: Full response

Any improvement in education and skills is to be encouraged, but we are concerned that this is used as one of the arguments to support an unsustainable level of new house building, when actually skills improvement should not be coupled with market housing. The effort in skills improvement should be concentrated on those areas of South Hampshire where educational standards are the lowest, which is one of the motives for regeneration in the most deprived areas. It is, as is said in paragraph 2.27, true that higher skilled workers tend to receive higher financial rewards, and that a high skills base will help ensure higher growth, but this is not in any way dependant on an increase in building on greenfield sites.

SHUV

Support with Comment: Section E1 Policy SH10 Sub-regional Transport Strategy

Section C: Summary: Any development should be PRECEDED by appropriate infrastructure. If not, there must be a review of the proposed levels of development. The proposed Light Rapid Transit System should be included as critical to the South Hampshire strategy, as it is essential to revitalise Gosport, and allow a sensible managed programme to redress the work/living imbalance in the district. The level of new house building is likely to lead to a considerable increase in traffic travelling northbound on the A3 and A32, which will have a detrimental impact on the designated South Downs National Park, and we suggest that consideration should be given to lowering the overall figures in the light of the potential damage to a protected landscape.

Section D1: Full response

The Government's recent decision not to allow funding for the proposed South Hampshire Rapid Transit System calls into doubt the commitment at ministerial level to put the infrastructure needs of South Hampshire at a sufficient level of importance. The SE Plan (paragraph 2.20) refers to the provision of new business floor space in particular in Gosport, where the job density is only 0.57%, the lowest in the South East region, and where the

transport capacity of the peninsula is seriously exceeded. No major provisions have been put in place for relief of this situation, and therefore new businesses are unlikely to wish to relocate to this area, even with a relatively cheap labour force in the nearby locality. Only if the congestion to the peninsula can be eased, will Gosport be a sensible and economic location for employment or office sites of any type. Other options may include reopening the disused railway lines as a public transport or bus-only route.

The location of the proposed Fareham SDA, i.e. north of the M27, does not seem likely to help contribute to solving the Gosport A32 problem, as any traffic improvements at Junction 10 of the M27 (currently restricted) will serve the new "town" and Fareham, leaving Gosport even more beleaguered than currently.

The PUSH submission suggests that the north of Fareham SDA will be 50% self-contained as regards employment. The employment land allocation is 121,000 sq. metres. Assuming that the 10,000 homes have 10,000 workers and half of them work where they live, then six people will be employed on every square metre of the employment zone. Even given "hot-desking", this seems very unlikely. The SDA will in effect be a dormitory for people working in Portsmouth and SE Hants.

It seems to us that the infrastructure requirements are purely relying on developer contributions which are unlikely to be either enough in financial terms, or to have a sufficiently strategic approach to deal with the myriad of congestion problems already facing the sub-region.

The capacity of roads such as the A3 and A32 running across the designated South Downs National Park should form an environmental "constraint", and should curtail any excessive development in the sub-region.

SHUV

Oppose: Section E1 Policy SH12 Scale and Location of Housing Development

Section C: Summary: as above for D3 Policy H1 and for E1 Policy SH5. Additionally we believe that the new housing figures to do take fully into account the possibility to utilise empty homes within certain districts.

Section D1: Full response

As above for D3 Policy H1 and for E1 Policy SH5. Additionally we believe that the new housing figures to do take fully into account the possibility to utilise empty homes within certain districts. We are collating evidence on this, and would ask for the opportunity to present it in full at the Examination In Public.

SHUV

Oppose: Section E1 Policy SH13 Affordable Housing

Section C: Summary: More affordable housing provision is to be welcomed, but this should not be linked or coupled to the planning of market housing/ Affordable and social rented housing should be provided on the basis of need, rather than as a fixed percentage of developer built dwellings. The consequence of this market-supply approach is to allow an excess of market housing just to meet the requirements for affordable and social rented accommodation.

Section D1: Full response

Funding for affordable housing is a key issue, and it is not sufficient to rely on provision coming forward only as a proportion of large housing developments.

SHUV

**Oppose: Section E1 Policy SH14 Environmental Sustainability bullet points 3 and 6
Section D1 - cross-cutting policies - policy CC4 (i) and (ii)**

Section C: Summary: This is a step in the right direction however it does not go far enough.

Section D1: Full response:

All new buildings and conversions should meet the Ecohomes/BREEAM Excellent standard immediately.

The Sustainable Homes project which provides advice to housing associations suggests that it would cost £1,680 extra to achieve an Ecohomes' "very good" rating and £3,040 to achieve an "Excellent". Given the environmental threats we face, the high cost of new homes and the comparatively high cost of retro-fitting environmental measures, we should specify "excellent" for new build from the start of the plan's period of operation.

There needs to be a target for the incorporation of other renewable energy generation into new build/conversions. The London Borough of Merton is proposing that all new build or conversions of 500 sq metres or one or more residential units have on-site renewable energy generation that would be equivalent to that necessary to reduce the predicted carbon dioxide emissions by at least 10%. This is not an exceptional requirement. More than 100 local planning authorities are now proposing a requirement for renewable energy generation with varying thresholds.

See:

<http://www.planningrenewables.org.uk/cgi-bin/article.cgi?type=feature&ID=1005&month=1002&ca=current>

Kirklees Metropolitan Council requires that all new public buildings source 30 per cent of predicted energy needs through on-site generation.

Section D2:

Text relating to Ecohomes/BREEAM standards should be replaced by "All new buildings and conversions should meet the Ecohomes/BREEAM Excellent standard. This standard should be reviewed every two years with a view to raising the standard as technology and practice in this field improves.

Text related to use of on-site energy generation should be re-worded so that it reads. "New build and conversions should be design to increase the use of natural lighting, heat and ventilation. All new build or conversions of 500 sq metres floorspace or more, or one or more residential units should have on-site renewable energy generation that would enable predicted carbon dioxide emissions arising from the building's use to be reduced by at least 10%.

Insert in both policies: "All new build and conversions should incorporate facilities to encourage recycling and re-use of materials."

Insert in both policies: "All new build and conversions should follow best practice in terms of Sustainable Urban Drainage".