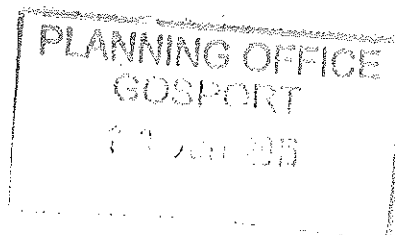


25th June 2015.

The Head of Planning
Policy,
Gosport Borough Council,
Town Hall,
High Street,
Gosport, PO12 1EB.



Dear Madam,
Gosport Borough Local Plan 2011-2029:
Notice of Proposed Modifications.

Thank you for your letter of 21st May 2015.

My comments are as follows:-
Schedule of Main Modifications to the Publication
Version May 2015.

1) Page 1 - MM1 Para 7.1, Para 7.99 - The
Hartland Peninsula also includes The Hartland
Detention Centre as a fourth large site.
The plans on pages 6 & 7 make this clear.

2) Page 2 - Policy LP6(i) - This wording
greatly limits the role of the LPA in relation
to applications which local opinion considers
fails the vague language used.

3) Page 2 - Policy MM1-LP6(4) - Contains
no reference to rises in sea levels during
the Plan period. Sea levels are rising
while Plan policies will remain unaltered
during the Plan period.

4) Page 4 - MM1 - Policies Map - This amendment should specify which mixed uses are incompatible with the known flooding danger.

5) Pages 4/5 - MM2 - Para 13.14 - This wording allows authorities to 'shunt' public sector housing into neighbouring districts. Here, with Gosport having an application ratio of applications for council housing six times the national average [according to Gosport Borough Council documents publicly available in the last 2 years], the wording appears to prepare prospective Gosport town Council tenants for a life miles outside the Gosport boundary. That in itself is bad enough, separating applicants geographically from their friends.

But the wording now proposed also enables Portsmouth City Council & Southampton City Council to offload Council housing on to neighbouring authorities. Historically, PCC has a long tradition of doing this, before and after World War II. At a PCC Council meeting earlier this year, I saw the leader of PCC admit that Portsmouth 'could not' (i.e. did not want to) provide for all its housing needs. The wording now proposed in the Para. will therefore allow PCC to offload its problems (as it always has done) on to neighbouring areas. This is one of the main reasons for PCC & SCC advocating a grant local authority, replacing the autonomy

of existing local authorities.

I cannot see how Gosport B.C., could agree to this modification.

Separately, I hope the modifications now proposed to this document are not being used to support the creation of a new PCC/SCC super authority.

Schedule of Proposed Minor Modifications to the Publication Version May 2015.

6) Page 1 - Para 1.6 Implementation & Monitoring
The anticipated review of this Local plan by virtue of POSH decisions at best replaces direct democracy by indirect democracy. This represents a clear reduction in local autonomy in planning matters, as well as strengthening the hand of developers who will argue that these Local Plans lose much of their status by frequent amendment. The position of the LPA is being undermined from two directions.

7) Page 5 - Ch. 9, Para 9.24, 2nd Sentence -
Given the flooding risk, the word 'exceptional' should not be replaced by 'certain'?

8) Page 6 - LP 26 - The obligation to replace 1 prospective pitch for Gypsies & Travellers is hardly likely to be applauded locally, and greatly restricts the powers of Gosport Borough Council as LPA in this matter.

9) Page 6 - Para 11.28 - Ditto. Given previous decisions & actions by Gosport Borough Council with regard to Gypsies & Travellers, how on

earth is this wording proposed here?

10) Page 6 - LP34 Point 3(B). -

The proposed wording completely ignores the difficulties of securing off-site planning permission, especially if the major site was opposed locally. The permission for the major site should include a condition to the effect that planning permission for the major site is dependent upon planning permission also being obtained for the off-site site. Additionally, the consent for the major site should not be issued until planning permission for the off-site site is given.

11) Page 10 - Para 12.97 - What happens if the developer goes bankrupt? Does the defaulted obligation fall upon who? Writing as someone who used to check planning permissions before issue for the enforceability and practicality of individual conditions, this question emphasises the apparent stupidity of developments in flood prone and flood possibility sites.

12) Page 10 - Para 12.00

The Para. should not be deleted in whole until the alternative approach of HCC is known and can be considered. Protections implicit in the document should not be comprehensively set aside because some other body is 'not ready' with an answer.

13) Silent Transport Strategy
This wording must make this

clear that it relates to transport responsibilities as under the existing local geographical set up of local authorities, and does not condone or encourage the creation of any PCC/SCC super authority.

14) Page 15 - Supplementary Planning Documents

Having reduced greatly the amount of statutory guidance which existed under the former planning system, the profusion of SPD's threatens to merely create a new burden of paper constraints. How is this new profusion to be kept under control by the LPA?

15) Page 31 - Proposed Modification Plan 2 Anglesey Conservation Area.

The proposed removal from the Anglesey Conservation Area of the former allotments north & west of Little Anglesey and the former railway line is opposed. Removal from the Conservation Area will facilitate development of this site, which has no access (unless the former railway line is converted from a walkway to a road with vehicles, or an access is constructed from the creekside Little Anglesey Road, which is prone to tidal flooding). Neither of these access options would be acceptable within existing planning constraints. Are locals aware of this proposed change?

If I have misunderstood the plan, what does the -o-o- in red refer to? It is not stated on the Plan tab top left.

16) Your requests for comments only on the Main Modifications represents a gag on free speech, particularly as your distinction between Main

6)
and Minor Modifications conceals the fact that some Minor Modifications are in fact Major. This deters the public from commenting at all.

Would you please confirm that these observations will be taken into consideration.

Yours sincerely,

