

Adrian Ellis
Case Officer
Planning Services
Public Services Plaza
Civic Road
Havant
PO9 2AX



Dear Mr Ellis

Planning Application APP/21/00647: 65 Dwellings, Langstone

I strongly oppose the application to build new homes on the land south of the Mallards, known as Southmere Field for the following reasons:

- a) **Southmere** The site of this planning application is not listed as a development site in the Local Plan Housing Statement. There is no current need to change an earlier decision and HBC should stand by that decision.
- b) **Access to the A3023:** Existing policy states that additional access points, or an intensification of use of existing accesses, will not be permitted, unless they form part of a proposal to deliver a development site allocated in the Plan. This development is not in the Plan and it seems Persimmon intends to avoid the policy by planning access to their development via an existing access road to the Mallards, a road that a few meters further on empties into the A3023.
- c) **Important animal food chain:** The planning application states that the site is used for animal grazing. This is inaccurate, instead it is mown to provide valuable animal feed and because the field is a haven for 58 species of vascular plants, and the feed is of extremely high quality. This food is transported to a neighbouring dairy farm at Warblington to replace grazing lost by the farm as a result of an earlier development. The consequence of losing access to animal food for a second time should not be dismissed.
- d) **Valuable habitat:** Southmere is known to be an important habitat for a number of rare and threatened species including curlews (British Trust for Ornithology - red listed); water voles (known to inhabit the stream which runs along the western border of the site); and barn owls (a pair has been breeding on the site and has regularly been seen hunting on the site). This site also creates a valuable habitat for bees and other wildlife.
- e) **Carbon capture:** Our Planners must not forget that wildlife meadows are important contributors to carbon capture. Because of its high proportion of leguminous plants and its soil ecosystem, Southmere is capable of absorbing carbon and should be considered a carbon sink. By putting houses on it we lose the advantage of the field leading to more searches for mitigation.

- f) **Utilising the site:** The area of the land is stated as 2.9 hectares which would attract a planning density of 40 houses per hectare. Why is the Developer asking only a total of 65 houses with a plan which appears to concentrate them on the northern half of the site? Is this to make further development applications easier and to provide a short term solution to meeting Conservation Area requirements? This should be investigated and reported upon.
- g) **Flooding:** Government legislation to prevent planning permission where there is a risk of flooding doesn't seem to have been adequately considered. It is inaccurate for Persimmon to suggest the field doesn't flood. It floods at least two or three times a year. Statements on flooding need re-examining.
- h) **Legal Covenant:** I am sure you are aware of a covenant covering the site. Signed by HBC in March 1980 the covenant states that "*no house or dwelling unit shall be built on the land and the land shall not be developed to provide any residential accommodation of any sort.*" Some are trying to conclude the covenant is old and has no residual power, and that similar covenants have been successfully overturned. Legal advice from two sources suggests this is inaccurate and in our case the covenant remains legally binding. The covenanted space was a gift to the community.
- i) The Covenanted Gift was given to a Local Authority to compensate for permission to build the IBM plant in Havant. The local Authority at the time had a policy to uphold the need for corridors between communities, oppose to suburban sprawl, and could be trusted to deny applications like this.
- j) The Government purports to support "localism". Localism is alleged to empower local people, but this is clearly not the case here. The Local Plan is not derived from any local need. The local authority is being required to build a quota of houses as a directive of Central Government and in obedience to a formula.
- k) **The Housing Need:** Genuine Housing need should be established from the bottom up:
- It should be based on satisfying the local need rather than fulfilling a central government formula.
 - It should be based on meeting the housing need of the least able to afford a home.

The house building industry is a secondary industry which historically followed the work and employment opportunities established in a locality where there is new economic growth. There is no economic growth in this area. Building based on the population movements stimulated by genuine growth would be large scale and require the parallel development of the supporting infrastructure.

Piecemeal infilling house building, of which this is an example, is development un-accompanied by the required infrastructure. It burdens the existing infrastructure beyond its design limits. These developments were prohibited by previous local planning regulations where the local authority was allowed to fulfil its duty to existing residents. Piecemeal infilling extends suburban sprawl long recognised as damaging and unsustainable. The extension of suburban blight has long been recognised as undesirable by local planners.

This application is encouraged by Central Government because it stimulates the economy in a thoroughly unhealthy and unsustainable way. It provides an economic stimulus by "granting change of use" which inflates land values by a factor of 10. It encourages the purchase of second homes as a category of financial investment. It guaranteed asset inflation which increases the distance to home ownership from the those who genuinely need homes. It is a socially destructive and divisive policy. It is counter productive if the objective is satisfying genuine housing need.

While quota house building creates the appearance of economic growth it is part of the UK's fake economy. It adds to the consumption side of the national economy and builds greater deficits in the country's balance of payments. It encourages inward investment by often absentee foreign owners at the expense of UK citizens. It provides a means of money laundering which Government cannot properly police when the financing is being made from foreign sources.

It is part of the government's "global Britain" strategy to sell off Britain instead of making Britain great again.

Yours Sincerely

Barbara Judyna 13/8/21
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