

Addendum to objection by Save Long Copse Lane Action Group.

The only justification for the allocation of the site is an endeavour to meet the housing targets imposed by central government as set out in the NPPF and the now flawed draft Local Plan. This tilts the balance in favour of development notwithstanding the serious environmental objections.

The development strategy in the Local Plan is predicated on the need to build 516 homes per year. This is derived from the Government's Standard Methodology based on a national housing target of 300,000 new homes per annum. In Havant this represents an increase of 201 new house per year. The Secretary of State for Levelling Up, Housing and Communities has stated that he intends to scrap the top-down approach to housing numbers which will render to whole approach in the Local Plan obsolete.

The actual housing need in the Borough is questioned. Need should not be confused with demand and there is an undeniable demand from Housing Developers to build more housing particularly in the South and Southeast. In terms of actual homelessness, it is estimated that there were 126 homeless people in the Borough out of a total population of 124,000 which is well below the national average. More housing attracts in-migration which is demand driven – not need driven.

The Census 2021 showed there were significantly fewer households in South Hampshire than were predicted at the time of the 2014- projections, notably Portsmouth by 7,000, Southampton by 5,000, and New Forest by 5,000. In Havant there are 1000 households less than predicted. Across the PfSH area there are over 19,000 fewer households in the Census than the figures which currently go into the standard methodology calculation used to allocate housing numbers across the constituent authorities.

There is therefore no overriding need to develop the Long Copse Lane site.

Havant is the 15th most densely populated of the South East's 64 local authority areas. Endeavouring to achieve ever greater levels of housing provision will only add to what is already an overdevelopment of the area with consequential impacts on the environment in terms of pollution, congestion, loss of open space and harm to biodiversity.

It is not Inevitable that just because Havant does not have a five-year supply of deliverable housing land that planning permission must be granted for 210 dwellings. Paragraph 11 d) ii of the current NPPF is quite clear that permission should NOT be granted if *'any adverse impacts of so doing would significantly and demonstrably outweigh the benefits, when assessed against the policies set out in this Framework taken as a whole'*. This was recognised recently by the Inspector dismissing an appeal on land west of The Shire in Westbourne (copy attached). I would also draw attention to the conclusions of the Inspector with regard to the issue of Bechstein Bats which is also directly relevant to the current application.

The Council should not determine this application in advance of the forthcoming review of the NPPF.