

Dear Mr Eaves

Objection to: Application/21/01434

I object to this application, made by Gladman, now owned by Barratt Homes.

The proposal is unsustainable, and not in the best interests of existing residents of Hayling Island nor of those in the Borough as a whole.

Havant Borough Council continues to pursue the “build, build build” mantra against the wishes of residents, and at the expense of those in housing waiting lists who need accessible homes within re-vitalised urban centres.

The presumption in favour of **sustainable development** remains at the heart of the most recent iteration of the National Planning Policy Framework (March 2019). See NPPF Footnote 7

Sustainable development set out in Objective 8, with the social objective to “*ensure a sufficient number and range of homes can be provided*” that expressively make “*effective use of land*”

There is also, in terms of plan-making, a presumption that emphasises the role of “**strategic policies**” which should as a **minimum** provide for the objectively assessed needs of the area but also “protect areas or assets of particular importance” (NPPF2 Footnote 6).

Strategic policies must set out the overall strategy for the ‘*pattern, scale and quality*’ of development and make sufficient provision to meet the need, to provide infrastructure and services, and for the conservation of the built and natural environment. (NPPF2 Footnote 20).

In brief extremely critical scrutiny of this application is needed, particularly in relation to the Protection of Area/Assets of Importance, and Highway : Guidance from NPPF March 2019

Highways. NPPF makes it clear that the ‘severe impact test’ for refusal of planning permission on highways grounds applies to highway capacity and not highway safety. It suffices for a refusal on safety grounds that the effect is unacceptable.

Natural Environment. Biodiversity gains are no longer to be secured only “where possible.”

In relation to AONBs, National Parks and the Broads, the scale and extent of development within the designated areas is to be limited. Major development remains unacceptable unless exceptional circumstances exist, and footnote 55 states that this is to be assessed by reference to the nature, scale, setting and effect of a given proposal.

The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site

In addition, regarding the particular circumstance of Havant Borough: Several significant imperatives that must ensure this application, at the very least, are put on hold:

- HBC Local Plan to 2036 has been withdrawn following unequivocal criticism following independent examination, largely to do with the lack of robust policies regarding Transport Assessment, and of inadequate policies for the protection of

sensitive, vulnerable biodiversity and habitat in the Borough (especially cumulative effects).

- Housing Standards making carbon neutral and future-proofed build are not mandatory until 2023, new builds in the interim will require expensive retro-fitting. This benefits developer profit but does not deliver good homes for the future.
- There are likely amendments to the Biodiversity Net Gain Metric in the pipeline before it becomes mandatory in 2023.
- Nitrates Neutrality. An expedited Appeal has been given permission over the impact of nitrates from new housing development in the Solent area (Fareham Borough Council), and advice from Natural England. The outcome will likely impact HBC's Warblington Farm policy for credits, and in addition HBC's Nitrates Neutrality Strategy will be tested in the forthcoming Local Plan consultation. Further impacts from new builds in the Borough must be held back.

The outcome of both these processes must be reasons to postpone any consideration of the Rook Farm application.

- Any plan (either alone or in combination with other plans) must be refused if a package of avoidance and mitigation measures cannot be secured to remove likely significant effect on the Solent European Sites. The Biodiversity Net Gain information contained within the application documents is wholly inadequate and lacking in transparency.

Lastly, Barratt Homes (who have acquired Gladman) have a very poor track record in the Borough – each development has failed to deliver agreed planning conditions: Some examples include

- The destruction in two separate “accidents” of protected mature agricultural hedgerow retention at Saxon Corner. Replanting plus inclusion of biodiversity deadwood depended on local resident's efforts to be achieved.
- Creation of green linkages within and through the site; new tree planting and good management. At Poppy Way, Local people had to seek agreed tree planting realised through Enforcement
- Inadequate wildlife mitigation and poorly functioning SuDS system at The Oysters.
- Mitigation for protected species, including appropriate buffers. The Sinah Lane replacement refuge for winter waders is neither established nor shown to function though required by obligations.

I should be grateful for your confirmation that this email has been received and included.

[Redacted text]