


Mr Adrian Ellis
Case Officer
Planning Services
Public Services Plaza
Havant
PO10 2AX

3 September 2021

Dear Mr Ellis

Application: 21/00647 Outline application for 65 dwellings on land south of The Mallards and west of Langstone Road, Havant

I have strong objections to the development of this site as it is virgin Coastal Grazing Marsh, and floodplain.

In addition, the following strengthen my objection:

1. Development will cause the loss of an integral component in local and regional green infrastructure, and undermine the connectivity and ecological value of this vital green infrastructure.

The essential value of undeveloped green space as linkages in a network supporting the viability and survival of biodiversity is recognised in the **Ecological Network** map for Hampshire (Mapping the Hampshire Ecological Network, HBIC Nov 2016).

Also, please refer to the ECOSA EIA commissioned by the applicant, in which Final Document 4.2 underlines the importance of this site in the integrity of **Functionally Linked Land** supporting the Solent SPAs.

See 4.2, pages 16-18 for lists and evaluation of the:

8 statutory designated sites within 2km of the site, and

6 Non-statutory Designated sites within 1km of the site

Also **13** designated Solent Wader & Brent Goose Strategy (SWBGS) sites within 1km of the site.

2. The Local Authority has a duty to protect, maintain and enhance the whole ecological network, not merely the protected and protected habitats (UK BAP Priority Habitats) within it.

This duty is set out in National Planning Policy Framework, and will be reinforced in the forthcoming Environment Bill:

- NPPF para 109: *“the planning system should contribute to and enhance...the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.”*

- **NPPF Para 117: “to minimise impacts on biodiversity and geodiversity, planning policies should...identify and components of the local ecological networks.”**
- Local Nature Recovery Strategies (LNRS) are set out in the Environment Bill (Clauses, 93(5), 95 to 99) with the objective of introducing local natural capital planning as a focus for place-based spatial planning, in line with the ambitions of the 25 Year Environment Plan; with a duty placed on public authorities to have regard to any LNRS and 5-yearly reporting requirements.
- A Lord’s amendment to the Environment Bill, following second reading, will propose a legally binding target on species abundance for 2030 to halt the decline of nature (acting on the recommendations of the Dasgupta Review).

This is in line with national disquiet about missed targets in the previous Environment Bill, and the view that specific interim targets (as well as long term targets) would be needed to hold the government to account, and should be borne in mind in current local authority decision-making.

3. The Local Authority has recently published its draft HBC Climate Change & Environmental Strategy 2021 to 2026.

The following is a statement from the Strategy’s Foreword:

“It is essential that all potential effects & impacts on the environment are mandated as material considerations in all decisions, policies or guidelines that HBC makes or produces”

Borough residents will expect more than lip-service from our councillors as regards ensuring our Borough environment is not further degraded for house building and other development.

4. Borough residents are aware of HBC’s own policies regarding biodiversity and ecology, and expect transparent and robust decision-making to protect the green sites and wildlife we hold dear.

In DM8 of the *current Local Plan*, the Local Authority states the intention to resist ***“Loss of open space important part of the visual & cultural character of Langstone, and the approach to the Harbour and bridge.”***

The *Borough’s Local Plan to 2036* (awaiting Stage 2 Inspection) proposes similar policies to conserve, protect and enhance existing natural features, landscape and the coast, and ecology;

See: Policy E14: the local ecological networks
 Policy E15: Protected Species
 Policy E16: Solent Protection Area
 Policy 17: Solent Waders & Brent Goose Feeding & Roosting Sites
 Policy 18: Trees, Hedgerows & Woodland

5. The development will also lead to the ***erosion and in-filling of the gap between Langstone village and the northern residential areas, and the commercial area around the Technology Park and hotel, and Havant Town.***

This is contrary to policy CS1: Protecting & Enhancing Special Environ & Heritage of Havant Borough, and the principal of maintaining distinct local landscape character, and the loss of open space that is re-iterated in E9: Heritage of the emerging Local Plan to 2036.

N.B. The term 'heritage assets' embraces all features that contribute to creating the unique sense of place including Listed Buildings, Conservation Areas, Registered Parks & Gardens.

This guidance from Historic England includes the attractive sight of an undeveloped grazing field that leads to Langstone Harbour, the agricultural past of Langstone Mill, the marine channels and low water shingle pathway to Northney, and Langstone Bridge with its momentoes of the Billy Line.

6. The outline application is lacking in necessary detail for any responsible decision-making: for example -

Up-to-date data on various protected species is not available;

- No mention of water voles known to be present in the boundary stream.
- Records on the extremely rare Greater Horseshoe bat are limited to May – Oct 2020, and not detailed enough to protect such an important species.
- Not enough data has been gathered on the assemblage of Myotis species bats present to enable accurate identification of the various types; this take time and great care, and has not taken place. This has important implications for appropriate protection...different bat species have different requirements, thus different protection strategies must be identified at an early stage.

7. A new area of public open space (seen on Map 3, Ecological Mitigation & Enhancement Plan) is proposed to mitigate the loss of habitat provided at present.

This is not credible:

- It is not of sufficient size to accommodate the 'meadow' proposed, plus 30 native trees (including large spreading species such as oak, beech and yew).
- The 1 hectare new reptile habitat proposed is inadequate for successful for mitigation & translocation. In particular, reptiles have relatively limited dispersal abilities, which make them particularly susceptible to the effects of habitat fragmentation, poor land management and disturbance; ref: *Reptile Habitat Management Handbook, Edgar, P, Foster, J & Baker, J (2010) Amphibian & Retile Conservation, Bournemouth*
- The likely impacts of trampling, dog disturbance, cat predation and childrens games will work against the success of species survival (plants, invertebrates, reptiles)

8. There is no detail about proposed compensatory measures for the loss of SPA supporting habitat. This detail must be provided before decision-making, and should be in place before any disturbance to the site to ensure those specific measures actually work satisfactorily.

9. The cumulative impacts of developments on the Solent ecological network, such as Forty Acres, Bedhampton West, Campdown must be taken more seriously, particularly following Natural England's published research that put the Chichester & Langston Harbour designation at risk (80% of Harbour water is impacted nitrates/algal bloom pollution).
(Please refer to my attached screen grab showing how the Borough's exiting & potential development sites will together increase negative impacts on the SPA)

10. A report published in May 2021 that uses the Biodiversity Intactness Indicator reveals that **nature in the UK is in a perilous state, retaining only half of its plants and animals.**

The resulting league table produced by the Natural History Museum and the RSPB, shows how much of the natural world is left in each of the G7 countries - the UK is at the bottom, and twelfth worst of 240 countries and territories.

This clearly a shameful and concerning reality, and I urge councillors to take proactive responsibility for the future well-being of residents and biodiversity.

11. As a final point, until this Authority can ensure a **robust and effective Enforcement** procedure, residents are increasingly unhappy about the approval of outline applications that most frequently evolve with scant council regulation or oversight, leading to undesirable results for existing residents, whether human or wildlife.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

