



Havant & East Hampshire
www.havantfoe.org.uk

FAO Ms Daphney Haywood, Havant Borough Council

Dear Ms Haywood,

Planning Application APP/19/00427, Lower Road Bedhampton

Havant Friends of the Earth objects to this application which in our view falls short of the higher standards now expected when it comes to managing the biodiversity impact of development on green-field sites in Havant Borough.

The applicant's ecologists report and assessment amount to the minimum action under measures proposed to mitigate the impact in an area of influence on nearby protected land. The overwhelming impression of their report is that provided the Bird Aware Solent levy is paid any environmental matters arising will be resolved.

Havant Borough Council has concluded in their draft Local Plan that sites falling within 5 kilometres of European designated sites could potentially have adverse effects on them. Consequently, an appropriate assessment of certain policies and proposals within the draft local plan is required from developers. EU HRA regulations also make this clear. Assessment in support of planning applications should consider whether the cumulative effects of all proposed residential development, located within the zone of influence, in combination could lead to significant adverse impacts on the integrity of the European sites. The ecologist report makes no reference whatsoever to other significant developments only a few hundred metres west of the Lower Bedhampton site.

In 2014 Natural England identified 15 threats to biodiversity, namely;
Public access/disturbance 2. Coastal squeeze 3. Fisheries: commercial marine and estuarine 4. Water pollution 5. Changes in species distributions 6. Climate change 7. Change to site conditions 8. Invasive species 9. Direct land take from development 10. Biological resource use 11. Change in land management 12. Inappropriate pest control 13. Hydrological changes 14. Direct impact from 3rd party 15. Extraction: non-living resources
Two more should be added, air pollution and nitrogen.

We would have expected to see, as part of the application, a quantified base line assessment of the present biodiversity value of the development site This should be followed by an estimate of the value post implementation of the mitigation measures as objective evidence of biodiversity gain as recommended in various sections of the NPPF.

As part of the mitigation package we would recommend a selection of bird nesting boxes and swift bricks designed into selected houses and a more generous tree planting

programme. We are very concerned that using this site for development further depletes the capacity of the area to support birds and wildlife. Also, the further loss of grades 1 and 2 agricultural land is noted. Finally, we firmly believe that this application should be held over until such times as the Local Plan Inspector has examined Havant Draft Plan and made his report later this year. As things stands many of the sites listed in the 2016 Housing Statement have already been approved or are in the process of being approved thus removing them from an independent examination.

Yours sincerely

Friends of the Earth
Havant & East Hampshire

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