



7 August 2021

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 by Persimmon Homes South Coast (PHSC) to build 65 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 designated as a housing 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, 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 hector. 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.

