



**Planning Development,
Havant Borough Council,
Public Service Plaza, Civic
Centre Road,
Havant,
Hampshire, PO9 2AX**

Application reference 18/00450
Land at Forty Acre Farm, Havant Road, Havant

16th June 2018

Dear Mr Oliver,

We object to this application for the following reasons:

SITE LOCATION:

Our primary objection to this application is the inclusion of the 40 acre farm site in the list of 2016 housing allocations. To begin with the site consists of almost 23 hectares of the best and most versatile agricultural land (BMV) -the highest classification of agricultural land. (William Cobbett described it as among the best in the country) With the onset of brexit, imported produce is likely to become more expensive thus raising the importance of achieving greater self-sufficiency. The NPPF is clear on this
“Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”

COALESCENCE BETWEEN SETTLEMENTS:

While strategic gaps have ceased to be a factor in planning decisions both NPPF and PUSH policies recognise the importance of avoiding seamless and amorphous urban sprawls between distinctive communities. Infilling 40 acres farm as well as Campdown to the north of the site amounting to a combined total of over 1200 houses (about 30% of the revised need) effectively joins Havant at the hip to greater Portsmouth.

CLIMATE CHANGE:

40 acres farm is a coastal location and in the front line of the long term effects of climate change which includes all types of flooding. 1 in 100 year or a 1% chance of an area being flooded in any given year flooding events are being rapidly revised as more evidence emerges of rising sea levels .

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/663885/Future_of_the_sea_-_sea_level_rise.pdf

PROTECTION OF NATURE SITES:

To the East South and West and near to the site is a cluster of internationally recognised protections including RAMSAR, SPA's and SSSI as well as an LNR and a SINC situated within the site. Having a major housing estate located so near such highly sensitive sites of strategic importance to the environment can only increase the already heavy pressure protected land and its diverse inhabitants are under.

ASSESSMENT OF HOUSING NEED:

The 40 acre farm site was one of many listed in Havant Council's 2016 Housing Statement. Following a successful developer appeal based upon the absence of an up to date Local Plan, the council set about rapidly publishing new housing numbers increasing them by another 4000 up to 2036 over and above those agreed in an earlier Plan published only 2 years earlier. The new numbers were part of an Objectively Assessed Need (OAN) exercise commissioned by the Partnership for Urban South Hampshire (PUSH) of which Havant Council is a member. The justification offered by the council for its haste was that unless it took a firm hand by publishing the new list as soon as possible, developers would move in with speculative bids and the council would lose control.

ADOPTION OF NEW HOUSING SITES:

Despite literally hundreds of objections the new list was adopted by the full council and is now a material consideration in this planning application. The council made no constructive case to resist the number produced in the OAN exercise preferring to blame the government and the OAN process. Hence what the council feared would happen without a plan is now happening with one and with the blanket approval of the council

PREMATURE DEVELOPMENT:

Part of the plan making cycle includes and an Examination in Public (EiP) by a government appointed Inspector in which all aspect of the Draft Plan are subject to review for soundness. Since the Housing Statement was approved by the council there have been a flurry of exhibitions and consultation forums and now the first planning applications involving a listed site with perhaps more to come. Our concern with this application and others like it perhaps in the course of preparation is that they are coming forward ahead of the EiP and in the event of being permitted would cease to be a part of the EiP thus denying objectors the opportunity to make representations to the Inspector. We can't help feeling that this is precisely where the council wants to be in its haste to complete the urbanisation of the entire borough. The council's position relative to this and other applications like it is summarised in the case officer's comments dated the 13th of June and placed on file on the 15th. In summary it says there are no obstacles to development at any level and whatever policies exist to protect the site will be changed to enable to be developed. The only game in town for the council has become to manage the annual house building target and all other arising issues are subordinated to meeting it. The end justifies the means.

CONSERVING AND ENHANCING THE NATURAL ENVIRONMENT:

Section 15 of the draft NPPF consultation document published in March 2018 dwells on the importance of policies that deliver the conservation and enhancement of nature and where possible achieve a net benefit to the environment. Reviewing the applicant's reports on bats, birds and other creatures as well as trees and shrubs and the mitigation measures proposed to compensate for their removal from the development site adds up, in our opinion, to a net loss to local nature as well as a threat to nearby conservation areas.

CONCLUSION:

Havant council is presides over one of the most developed borough's for its size in Hampshire and yet has committed itself to more houses than it has truly sustainable land capacity to deliver. It has failed to challenge the outcomes of the OAN, failed to negotiate under the duty to cooperate with other authorities to meet housing needs, ignored public feedback and signalled to developers that 'it is open for business' notwithstanding the medium to long term risks to the local natural environment.

