

Objections to Campdown Development, APP/19/01101



20th January 2020.

1. Archaeology.

Historic England have stated that development at Campdown has the potential to affect the significance of three scheduled monuments of national importance and requests that further work is undertaken to fully assess the contribution of the setting of these three scheduled monuments to their significance. An assessment should also be made of the potential archaeological significance of these settings and the remainder of the development site before it can be considered that this allocation is sound and to indicate whether or not development on this site is acceptable in principle and if so, over what area and of what layout and form.

The map below shows that the 3 scheduled monuments will have their setting destroyed on 3 sides by a potential housing development when, as yet, the 3 have not been fully evaluated. An opportunity to develop them for preservation and historical educational purposes may be lost.



2. Nutrient neutral development.

Natural England recommends that to appropriately address uncertainty of the impact of the planned development on the deterioration of the water environment, a policy to commit to a nutrient management plan or similar strategy to offset the delivery of increased nutrients from the development should be created. This is to ensure the on-going planning applications meet legal requirements until a wider Integrated Water Management Strategy can be developed.

3. Solent Waders and Brent Goose Strategy. H40 Campdown.

Natural England highlight that the site is a Primary Support Area for Brent Geese, and question whether adequate mitigation is possible. It is Natural England's view that a thorough mitigation strategy will be required and advise that it may be difficult to achieve net biodiversity gain from this development.

Natural England commented on the HRA and highlighted the following issues: Changes to the Habitats Regulations Assessment are recommended, particular in relation to policies E17, E14, H15, H27, H40.

Uncertainty with regard to the deliverability and appropriateness of the proposed bird refuges to provide mitigation for sites H27 and H40. This should be addressed in the HRA. Alternative solutions may be necessary to support the allocations. The evidence used in the SWBGS does not correlate with actual survey results taken and is based on inaccurate assumptions.

Natural England have raised concerns in relation to the uncertainty of securing refuges and delivering them. They have suggested that there needs to be a commitment within the policy to secure the early delivery of a strategic bird reserve to address the loss of Secondary and Low Use Sites.

Other objections that have raised:

Development should not take place on sites which support internationally important species. It is inadequate for a site that has for years hosted over-wintering wildfowl to simply be relocated. There is not sufficient evidence to show that wildfowl would move to a newly sited location.

The total area of mitigating land is less than the total area of land lost to development.

It is unclear how any mitigation will be enforced and managed. Also, how good quality management will be secured in perpetuity for the proposed refuge be guaranteed.

The approach is not robust and only increases the cost of new homes.

Natural England supports the identification of Broadmarsh as a permanent refuge area and acknowledges that its deliverability is more certain than the Hayling Island Brent Goose Refuge, as it is owned by Havant Borough Council. However, it has concerns about the appropriateness of Broadmarsh to fully mitigate the numbers and species at Campdown (H40). They recommend that Broadmarsh Coastal Park refuge is brought forward in a phased manner to allow an appropriate refuge to be available in advance of the loss of Secondary Support Areas and Low Use sites within the Borough.

The Deliverability is questionable – the time and cost involved in creating replacement habitat; development viability implications of mitigation.

Suitability and effectiveness of mitigation - Broadmarsh is unfeasible as mitigation as it is already used by SPA birds. The area is a popular destination for walkers, cyclists and visitors. There will be disturbances through human activity and surrounding uses including car parks, angling club, boat storage and public slipway. These surrounding uses are not compatible with a refuge. SPA species will be at risk from oxides of nitrogen; National Grid line crosses the site; and the refuge would not include livestock grazing to replace what would be lost at Campdown (H40). Lack of credible evidence / inadequate information as to whether replacement habitats are effective, and the time it can take before a refuge can be considered to be a genuine replacement; a larger more suitable refuge for SPA species should be found.

Loss of amenity / recreation – the site is well used by walkers, cyclist and visitors. Any fencing off to protect bird life will reduce amenity and adversely impact health and wellbeing.

Nitrogen Action Plan – The refuge should be excluded from the Plan until the joint Nitrogen Action Plan (for air quality) with Portsmouth City Council has been developed and shown to be working

4. Effective provision of infrastructure and Infrastructure Delivery Plan.

The delivery of infrastructure should come before housing and commercial development.

The IDP is inadequate because it does not recognise the infrastructure requirements for a 15+% increase in population. The number of dwellings constructed in a half mile radius of the bridge on Portsdown Hill Road over the A3M over the past 4 years and that are proposed in the next 4 years is approximately 1500. There has been no development of infrastructure such as transport, education, primary and secondary health care and amenities for health and well being required to offset congestion, pollution and ecological damage.

There is a lack of confidence in the Borough wide TA as numerous local routes around H40 are already at capacity including Portsdown Hill Road and its junction with Crookhorn Lane, Bedhampton Hill Road, Hulbert Road and Bedhampton Road. **Highways England** have submitted a technical review of the TA and would “welcome” the opportunity to discuss the proposed mitigation measures and the associated modelling results produced for A3(M) and A27.

There should be a requirement for electric vehicle charging points on site for both residents and visitors and there must be an adequate number of visitor bays to prevent on road parking spilling over into Crookhorn Lane.

5. Generally.

There is a widespread culture by developers of over dependence on **mitigation** measures which some may consider cynical, rather than working to avoid harm. Mitigation by definition means that there will be residual harm. I cannot find any data that demonstrates how effective mitigating policies are in the planning process. There should be a drive to demand much greater scrutiny and objective data of any action requiring mitigation in the future with follow up.

Planning applicants justify decisions by using deflated projections of impacts and only use current availability data with no acknowledgement of piecemeal incremental accumulative effects of projected developments in any one area on local settlements, be it traffic, schools, health, ecology or environment.

In the near future there are likely to be completed developments at 40 Acres (320), Campdown (780 + 90 in the Southdown College car park), Little Park House (50) and Lower Road (50). A total of 1290 dwellings all competing for space on the roads, access to GPs and places within local schools whilst seriously depleting the amount of green space around the southern part of the A3M corridor, placing flora and fauna at risk.

Health care is an example of infrastructure not being in place before development. It is noted that SE Hants CCG will be looking for a contribution of £124,800 of planning gain for health from the developers of Campdown to pay to make suitable building adaptations to facilitate this growth. This amount of money will not go very far! The letter implies there will be no significant impact on primary care but the real story is not being addressed. There are at least 2 local practices whose lists are closed to new residents whilst it gets increasingly more difficult to make an appointment. This is due to an increasing demand and a lack of ability to appoint trained GPs. If a patient is unable to see a GP in a timely manner the natural reaction is to turn up at A&E transferring the stress from primary care to more expensive secondary care. An inappropriate use of resources of funds and assets.

6. Conclusion.

The need for affordable and social housing is recognised but not at any cost. This application should be rejected and should go forward with the emerging HBC LP 2036 to EiP where its appropriateness in the context of Borough wide development can be assessed.