

1. This housing development proposal has come forward prematurely as it is a new site within the emerging HBC Local Plan 2036 that has not yet been subject to public examination by an appointed Planning Inspector. When Campdown was allocated for housing in the Local Plan Housing Statement December 2016, as policy UE70, it was for just 350 dwellings. This was approved by Members after assurances that infrastructure concerns would be made a priority. In the Pre-submission LP2036 this 350 figure increased by 60% to 560 new dwellings and now this application adds another 40% to 780. This spiralling figure should again be put before the Full Council to approve this 100% increase in housing numbers at Campdown and then be scrutinised by an appointed Planning Inspector.
2. Persimmon's Masterplan Layout is not in accordance with the emerging HBLP2036 Policy H70 article 'n' 'The design and layout'. It does not respect and fails to enhance the route of the Roman road that crosses the site or the public footpath that has been on local maps since at least 1825.
3. Wildlife - Persimmon have not carried out proper survey results for bats, mammals, botany or reptiles relying mainly on desk-based studies. [REDACTED]
[REDACTED] This proposed development would completely close off the existing wildlife corridor that extends parallel with the A3(M) motorway from Langstone Harbour inland to East Hants. No evidence has been submitted by Persimmon to show this development will provide a net gain for biodiversity as required by the NPPF.
4. Trees and hedgerows - I wholeheartedly agree with Havant Borough Tree Wardens' objections. When Campdown was allocated for housing in December 2016 an Area Protection Order should have been applied to safeguard the veteran trees on site, HBC Arboriculture Department failed to do this; this allowed landowners Gauntlett to fell eight mature oak with impunity. If this application is approved, or not, these trees should be replaced.
5. Campdown was not allocated for housing in the Adopted Allocations Plan 2014, most of the fields are protected by policy DM23 - Sites for Brent Geese and Waders. *"Where a negative impact upon an important site cannot be avoided or mitigated and replacement feeding/roosting habitat is not or cannot be provided on a no net loss basis, the proposal **will be refused**."* The application site includes the sites highlighted within the Solent Wader & Brent Goose Strategy as Primary and Secondary sites of importance to feeding Brent Geese & Curlew i.e. H02A, H125, H106 and H113. As such the site is classified as functionally linked land integral to the Special Protection Area (SPA) Chichester & Langstone Harbours designated under EU Habitats Directive and now adopted into UK law and is therefore protected in the same way the SPA is protected. The development scheme as presented shows Persimmon have made no attempt to observe the first rule of environmental protection which is 'avoid harm'.
6. To mitigate the loss of the Primary and Secondary Support areas at Campdown Persimmon are suggesting a refuge be set up at Broadmarsh Coastal Park but Natural England stated in their Local Plan 2036 consultation response: *"There is uncertainty as to whether the refuge will attract waders such as curlews due to the size of the site."* Havant Borough Biodiversity Strategy states – para 3.99 *"As there is little academic research regarding the use of SPA bird refuges in the UK, it would be practical to use the Council's own site as an "experimental" site to test out this new refuge approach."* Using a word like "experimental" does little to instil confidence in the success of this proposal. Fencing off the suggested core area of 1.3 hectares to mitigate the loss of 31 hectares of proven feeding fields for curlew and brent geese is an insult to intelligence; experts agree a rule of thumb for replacement habitat for shore birds is in the order of 2:1. In short Broadmarsh is unsuitable replacement habitat in quality and size. The Council is reminded that NPPF para 175 states: *When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be **refused**.*
7. The Havant Borough Biodiversity Strategy, January 2019 Paragraph 3.104 identified Campdown as a potential SPA bird refuge - *"Two Primary Support Areas have been allocated for residential development. In accordance with the avoidance, mitigation and enhancement guidance set out in the SWBGS (2018), there is the potential for a further two SPA bird refuges. These should include: Refuge 3 – H34C North and Refuge 4 – **Campdown**"*. Natural England welcome this approach and that is what should be done with the vast majority of these irreplaceable fields.