

**Deputation to HBC Planning Committee 21st October 2021
on behalf of Havant Friends of the Earth and Havant Climate Alliance
re. APP/20/00441 Land west of Hulbert Road.**

We object to this application for Outline Planning Permission.

Local Plan

The site is not designated for housing under the Local Plan to 2037 which is still under public examination. It is stated that the Inspectors may view it as an “omission site” but this is not yet known. **Any decision about the site should be delayed until the outcome of the public examination is known.**

It has been noted that the site is isolated, being outside the urban area as defined by policies CS17 and AL2, and outside the Settlement boundary defined by policy E3 of the Plan under examination.

Under policy IN1 and the Council’s Infrastructure Delivery Plan the site was seen as suitable for an Emergency Services Hub, for Police, Fire and Ambulance, with good access to the major road networks. This would be a more appropriate use of the site, subject to the appropriate environmental avoidance and mitigation. The relocation of these services from the centre of Havant would free up brownfield land near the town centre, more suitable for housing development.

It seems that the only reason that this site is being considered for housing is the pressure to increase home completion targets. However, if planning permission were given, and the developer were to delay building for up to 3 years, it is quite likely that home completions elsewhere would have already increased to an acceptable level within that period.

Noise pollution

Noise mapping shows that noise levels from the A3M would be at unacceptable levels for residents of higher level apartments, even with an added bund. We already have a number of new housing developments close to the A3M and A27 where noise levels are excessive and must impact on residents. Just because previous developments are subject to excessive noise does not mean that the same criteria should be applied to new developments.

If this development is granted Outline Planning Permission, the following conditions should apply:

Trees

We agree with the view that ancient woodland and TPO mature trees should not be felled, including T5 a mature oak tree. The development should be designed around these trees.

A large number of “poor quality” trees and shrubs are to be felled under this plan, mainly to make way for a walk and cycleway. Despite being of “poor quality” they none the less have an important role, in combination, of sequestering carbon. It is

important that the developer compensates for trees felled by planting a comparable number of native species on site. A management plan needs to be in place to assist with the survival of trees and shrubs during their first few years.

Bats

8 species of bats have been recorded on the site, foraging and commuting. This is noted as “a reasonable bat assemblage” which places the site as having regional value. It is important that connectivity round and across the site should be maintained, with infill planting of native species round the edges of the site where needed, and adequate trees and shrubs planted throughout the site to enable this. Bat boxes on houses or trees are advised. Lighting should comply with Bat Conservation Trust standards.

Dormice

A few dormice and their nests were found in 2019 and 2020 surveys. It is important that their habitat on this site is maintained and advice on this followed. Up-to-date surveys would be needed before construction work commenced.

Birds

Construction should only take place outside the breeding season.

Low carbon design

In view of the climate crisis it is essential that construction should comply with low carbon standards due to become mandatory by 2025, which will also increase their attractiveness to future residents. Not only should there be a high standards of insulation, but also low carbon heating using ground or air sourced heat pumps, and use of solar panels (PV or thermal). All can be installed more cheaply during construction, than retrofitted later. The bund beside the A3M could be considered for wind turbines

Active Travel

We support the proposal for an off road cycling and walking track from the site, down to the Asda roundabout, and up to Dunsbury Park. However this should avoid TPO or mature or veteran trees. Homes need secure bike sheds.

EV Charging points

These need to be installed outside all homes to encourage the take up of electric vehicles.

Patricia Brooks