

Comments on Matters and Issues related to the Examination of the Havant Borough Local Plan on behalf of Havant Climate Alliance and Havant Friends of the Earth

Matter 1 – Legal Requirements

1.3 Sustainability appraisal

We support the Council in their statement, in letter CR08, that there is a lack of sustainable alternatives to allow potential allocation sites to be assessed against each other. It is our opinion that the current combination of proposed sites, in addition to proposed sites in neighbouring authorities, is itself environmentally unsustainable due to the following combined environmental constraints.

These are:

Need to leave a large enough area, in a combination of sites, for Brent Geese and Wader foraging and roosting (reference our comments on MIQ 4.12)

Need to achieve Nutrient REDUCTION, not just Neutrality, in Langstone and Chichester Harbours (reference our comments on MIQ 4.8 – 4.11)

Need to preserve the remaining undeveloped Best and Most Versatile agricultural land within the Borough boundaries (reference our comments on MIQ 2.20).

1.5 Climate change

Policies contributing to the mitigation of Climate Change

Policy E12. Since 49% of annual carbon emissions in the UK derive from buildings, this Policy is critical. Further to our previous submission, E12 has good proposals for low carbon design, heating and cooling, but this does not go far enough. The Local Plan proposes a carbon reduction of 19% (of DER compared to TER) on previous standards, with reference to Building Regulation L. This is due to be updated with the Government supporting a 31% reduction of carbon emissions which should be incorporated into the Local Plan. Gas boilers, due to be banned in new homes from 2025 are still being installed. The Local Plan should make it a condition of every new planning application, that low carbon alternatives which are easily available now, should be used e.g. Solar PV or Solar Thermal Panels and Heat Pumps. District heating or combined heat and power systems (providing that the fuel source is low carbon) are also to be aspired to but will require longer to develop.

The Local Plan should also include plans to retrofit existing homes, with insulation and replacement of gas heating with low carbon alternatives.

Policy E18. The Council rightly seeks to protect trees and hedgerows, especially irreplaceable ancient woodland and mature trees which play such an important role in carbon sequestration. Where trees have to be cut down to make way for

development it should be stipulated that developers must compensate not only by replacing the same number with saplings, but need to greatly exceed that number to mitigate for the loss of CO2 absorption. On average a young tree will only absorb 6 kg CO2 pa while a tree over 10 years old can absorb 22 kg pa. Mature and veteran trees will absorb far more. We support long term and in-perpetuity plans for the management and care of young trees, as too often, they are left to die during droughts. Beyond the replacement of trees lost to development, there also needs to be a Policy of planting very large numbers of additional native species trees wherever is suitable around the Borough to increase CO2 absorption.

Policy EX1 Water Quality. Seagrass beds which were once abundant in the Solent Harbours not only provide food for marine life but could also have an important role in mitigating climate change. For a given area they can capture carbon 35 times more quickly than rainforest (Marianne Holmer – University of Southern Denmark). However these seagrass beds have become degraded due to the overgrowth of green algae caused by excess nutrients (nitrates) in the water (Ricardo report). Even if not getting any worse, seagrass beds are not recovering or expanding. The Council's policy is to aim for Nutrient (Nitrate) Neutrality, but for seagrass beds to recover, the aim should be for Nutrient Reduction. While the remedy for this partly lies outside the Council's powers, with the need for Southern Water to increase capacity at their Wastewater Treatment Works, there is a case for all large developments in the Borough to be required to have their own Wastewater Treatment Units located on-site.

Policies contributing to adaptation to Climate Change

Policies E14, E15 and E17. A wide range and area of habitats and ecological networks need to be maintained to enable the survival of wildlife species despite the pressures of climate change. Particularly for Havant's location, there is concern at the loss of foraging and roosting sites for Brent Geese and Waders, due to rising sea levels, e.g. the future loss of Farlington Marshes is inevitable. This adds to the importance of leaving a sufficiently large area, in combination, of current and potential sites undeveloped. The Council method of looking at "in combination" effects in their Habitat Regulations Assessment (ref. CD13a) does not take into account the overall area that will be lost if all proposed developments go ahead.

Patricia Brooks 18.6.2021