

## Potential appeal comments re APP/A1720/W21/3271412

1. Housing shortfall brought about by national target setting frequently changing and delays in approvals from national intervention regarding nitrate pollution of Solent. FBC have a draft local plan ready for consultation identifying housing numbers without using this site.
2. National Planning Policy protects building on the highest quality agricultural land. Independence from EU should reinforce the need for retaining the best and most valuable agricultural land.
3. Natural England describe the site as *being on the urban fringe forming part of a wider countryside gap of 40 hectares*. FBC are reviewing the landscape assessment of this site, which forms an ecological coastal corridor essential for supporting plant and wildlife biodiversity.
4. The appellant describes the site as heavily influenced by urban development. No residents, visitors, planners or environmental organisations would agree with this statement as views are overwhelmingly of open farmland, countryside and coast.
5. The appellant states the site will have no impact on Portsmouth Harbour as a special European site. Natural England, FBC, Hampshire CC Ecologists and Hampshire Wildlife Trust all consistently and robustly state there would be a significant impact because of its proximity. In addition surface water run off will increase flooding on the recreation ground, which will directly pollute Portsmouth Harbour SPA.
6. The appellant states that the site is classed as unimportant for Brent Geese and Waders however it has consistently been identified as Important and more recently as a Primary Support Area. I regularly heard Brent Geese on the site in the early hours during February and March probably associated with high spring tides. The evidence contained within The Solent Waders and Brent Geese Strategy is overwhelming.
7. The appellant states that all impacts on protected or priority species will be mitigated or avoided with a 10% net biodiversity gain. A specifically designed fenced area in Southsea this winter failed to attract any Brent Geese. A BCA on this site is likely also not to attract any migratory birds due to adjacent development, housing, noise and light pollution particularly from the adjacent football club. There is no mitigation offered for badgers, bats, deer, partridge, pheasant, slow worms etc.
8. The appellant must accept the responsibility as the Agent for Change and mitigate the significant noise and light pollution generated from the established and popular AFC Portchester football club. National planning policy protects existing clubs and businesses from being closed down or having restrictions imposed by residents moving into new developments.
9. The highways impact and safety concerns have not been addressed particularly in relation to congestion on the A27, reduced pavement width and increased pedestrian risk particularly between the two local schools. Impact of TRO's on local residents as there will be an absolute lack of on street parking capacity. Pedestrian safety risks crossing the access road have also not been adequately mitigated or proven to be safe.
10. The appellant has not accepted any of the considerable surface water drainage concerns. Water engineers and advisors describe the SuDS strategy as 'overly optimistic'. Not allowing for any surface water run off to go into a stream or drain as an 'unsafe concept'. The Soils ltd investigation was undertaken in summer (July) and so no data relating to high winter and spring tides is available. The water table is likely to be close to the surface during the winter. The retention ponds do not have infiltration and therefore will overflow and create additional flooding to the well-established flood zone impacting the BCA, football ground, recreational area and additional pollution directly into the Portsmouth Harbour SPA.

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