

From: Norton, Tristan

Sent: 27 February 2025 18:18

To: Eaves, David

Cc: Weaver, Louise

Subject: APP/24/01010 | Proposed employment development, with associated access, parking, yards and landscaping Classes B2 (General Industry), B8 (storage & distribution) and Class Ec-g. | Interbridges Site, New Brighton Road, Emsworth

Dear David,

APP/24/01010 | Proposed employment development, with associated access, parking, yards and landscaping Classes B2 (General Industry), B8 (storage & distribution) and Class Ec-g. | Interbridges Site, New Brighton Road, Emsworth

Thank you for consulting me on this application. I consider that clarification is required on a number of matters.

The application is accompanied by a Preliminary Ecological Appraisal (EcoSupport, November 2024), a Phase II Bat Survey Report (EcoSupport, November 2024), a BNG Habitat Management & Monitoring Plan (EcoSupport, November 2024), a Landscape & Ecological Management Plan (EcoSupport, November 2024) and a Biodiversity Net Gain Statutory Metric (EcoSupport, November 2024).

The site comprises an area of mixed grassland, herbage, scrub and woodland situated immediately south of the A27 and north of the railway line. The site has been subject to a great deal of physical disturbance over the last decade or so, at times being largely cleared of vegetation. The grassland within the site is described as being relatively herb-rich, although much of the site is covered with dense Bramble scrub. The northern section of the site abuts dense secondary woodland/tall scrub along the line of the A27. The southern site boundary is defined by a similarly dense fringe of secondary woodland/scrub along the railway line. The site appears unremarkable in terms of its botanical diversity but nevertheless provides a valuable area of relatively undisturbed semi-natural habitat. The site is listed as containing the Priority Habitat 'Lowland Meadow' although the extent to which this has been ground-truthed is unclear. The vegetation assessment was carried out in late March 2024: this is not an ideal period at which to conduct botanical surveys as many species are not yet visible or detectable unless the surveyor is proficient at vegetative plant identification. As an example, the Botanical Society of Britain & Ireland (BSBI) database has records of Cuckooflower from this site, indicative of damper grassland and perhaps indicating that the plant species list for the site may be greater than that recorded on a single visit in late March.

The site is also within relatively close proximity to the upper River Ems and in particular the sensitive Lumley Meadows SINC (aka Brook Meadow), and area of damp meadow grassland. I would welcome further clarification on whether the potential hydrological impacts of development on sensitive 'downstream' areas has been considered, if indeed there is any hydrological link.

The proposed development will result in direct loss of substantial areas of the grassland and Bramble scrub, to the extent that most of the on-site habitat will be lost. The scheme will introduce extensive areas of hard surfacing and buildings and the associated potential for impacts related to noise and visual disturbance and artificial lighting. The site has been shown to be of at least local importance to foraging/commuting bat species. I would welcome the ecologist's comments on the submitted lighting layout.

The proposed 'native groundcover' includes *Ajuga reptans* – I suspect this will end up being a garden cultivar such as Burgundy Glow rather than the true native species. Similarly, *Geranium sanguineum* is not a species native in the wild in Hampshire. I would suggest that there are more appropriate species, native to Hampshire, that would be more suitable for an area of 'native' ground cover. The more formal areas of landscaping contain plant species that may have invasive tendencies, such as *Lonicera ligustrina* and *Miscanthus* and ideally I would wish to see alternatives used. I would suggest that the applicant's ecologist is consulted on the composition of proposed landscaping areas – there may be further opportunities to mitigate the loss of semi-natural habitats and provide a more imaginative landscaping scheme and increase the on-site BNG offer.

The site had previously been subject to a reptile translocation exercise under permission APP/10/00912. I would be very wary of making the assumption that the site has remained clear of reptile species since that translocation was undertaken. This conclusion, made in the current report, assumes that the reptile barrier fencing has remained wholly intact in the intervening years (I would wish to see evidence of that – there is no reptile fencing along the boundary with North Street for instance) and that all animals were removed in the first instance and that no animals could possibly have colonised since. This seems potentially unlikely in my experience. The existing habitat most certainly seems optimal for reptile species. Further clarification is required.

The site would seem suitable for supporting nesting birds in my view. Whilst acknowledging that some habitat clearance has occurred, has this resulted in no taller or denser scrub habitat being present at all? From a review of online imagery, the site was certainly optimal bird habitat in 2022 but appears to have been at least partially cleared by autumn 2023. Has the site remained clear of all structured vegetation since that date? The images within the current PEA show the site in early spring – one might expect suitable habitat to be present later in the year. Further information is requested to clarify the suitability of bird habitat present.

In respect to Biodiversity Net Gain (BNG), the submitted Biodiversity Net Gain Statutory Metric (EcoSupport, November 2024) demonstrate that the proposed scheme will result in deficit of 3.03 habitat units (equating to a 76.41% loss), comprising medium distinctiveness habitats such as Other Neutral Grassland and Bramble Scrub. The proposed on-site BNG measures equate to small areas of various habitats and, whilst of course welcome, do not make a considerable dent in the overall BNG requirement. In my view, the site landscaping scheme could be much bolder in its use of semi-natural habitats and therefore help to improve the on-site BNG offer. This would be in accordance with the BNG hierarchy. As presented, the large shortfall in BNG units is proposed to be met off-site at the Iford Estate in East Sussex. This is procedurally correct but unsatisfactory. The site is to contain extensive areas of roofing – has the use of green/brown roofs been considered? Or non-priority ponds, especially as much of the site appears to be susceptible to groundwater flooding? Overall, the on-site BNG offer seems rather limited and unambitious and I would welcome further clarification.

If you have any queries, please don't hesitate to contact me.

Kind regards,

Tristan

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