

Application 19/01101; Land East of, College Road, Campdown, Purbrooke, Waterlooville.

Additional comments: Havant Borough Tree Wardens, May 2020

Havant Borough Tree Wardens are very disappointed by the lack of appropriate assessment of the three main groups of trees and shrubs on the Campdown site. These contain Veteran and near-Ancient trees with verified records on the Woodland Trust/Ancient Tree Forum's Ancient Tree Inventory (ATI)

We understand the Borough's arboriculture officer met the Developer's arboriculture consultant just before lockdown for Covid-19. Regrettably, no recommendations have resulted regarding protection for these groups of historic wood bank, nor the Veteran and 'near-Ancient' trees in them.

There is no justification on a development site of this size to remove two mature hedgerows as proposed. Sitaline's Site Survey (drawing 688CD01, Sept 2016) shows how important these groups are as they create links with established oak and hawthorn trees on the southern and eastern site perimeters that provide bat foraging flight line navigation.

Having surveyed these trees, and had their Veteran status verified by David Alderman (Director of the Tree Register and Lead Verifier for the Ancient Tree Inventory), we hold a firm opinion these trees are irreplaceable and of very high ecological value, and it should be a Condition that these groups are retained for their landscape and ecological value.

The Woodland Trust Consultee comment (14.2.20), concludes with their objection planning application 'unless the applicant is able to retain all veteran trees on site, and both the veteran trees and ancient woodland are provided with suitable buffer zones in line with Natural England's Standing Advice.

In summary: surveys and subsequent mitigation plans for hedgerow and trees on site, bats and dormice seem inadequate for a development of this scale, and in any case proposed re-planting of hedges will take time before bats and other wildlife can benefit from them.

The value in biodiversity terms of the existing hedgerow and veteran tree groups is undeniable, and it is disappointing that WYG's recent additional comments regarding bats insists on regarding the adjacent ancient woodland and on-site veteran trees within hedgerows as of low suitability for bats, both as forging/commuting routes and as potential roots.

There are several bat species that roost in the cavities of old trees such as those Veteran and near-Ancient trees on record in the ATI, including Bechstein's and western barbastelle.

In his December 2019 comments, the County Ecologist made clear his surprise at 'the relative paucity of bat species recorded here: one would expect at least twice as many species', particularly since it is in range of the rare Bechstein's bats recorded in nationally-important numbers only c.3 km to the north-east.

Even a gappy hedge, or tree line can be an essential bat commuting route for some species, maybe only at certain parts of the year when bats try to reach specific feeding areas supporting seasonal insects.

For this reason, WYG's transect surveys carried out on three days in the year will almost certainly miss important information, and lead to mistaken conclusions.

As maternity roosts are mainly active in June and July WYG would have likely missed activity in any of the trees we noted on site. Their transects at the very end of October, and in very early April do not provide an adequate basis for interpretation. The addition of a walked survey in a single transect in June 2017 cannot be regarded as a reliable sample of all bat activity on site.

The absence of the static detector information is a serious flaw, and should be remedied, and experienced, qualified bat recorders would add that a season of bat capture surveys should also be required.

It is possible WYG are simply repeating their initial assessment that Campdown is of low bat potential. However, when did they obtain the desk study information for their October 2019 reports? They state they requested HBIC protected species information from 2km surrounding the site, but there is a rather long delay before crucial information is included in the records, and during that delay the most up-to-date records should be requested from the County Bat Group.

Because of development pressures, a vast amount of bat survey work has been undertaken in Havant recently and current results to 30th April 2020 are held by the Hampshire Bat Group which notes 2,947 records of at least 14 species.

It is true that there are not many records from the proposed development site itself as it is private land, and WYG has failed to report any bat records to the county databases available to the planning ecologists.

However, the site is within the "*Bechstein's Area of Search*" as defined by Policy E15 of the Havant Borough Local Plan 2036.

In addition, there were a series of bat capture surveys in 2018 at Oaklands School playing fields (centred at SU689079) with the definite identification of 8 bat species, some very rare. These records were made less than 1 km north of Campdown (adjoining Johnson's Coppice) with good connectivity to the Campdown site, its grassland and hedgerow groups.

Policy E15 expects any development likely to result in the loss of habitat to be the subject of impact assessment leading to fully detailed ecological mitigation and enhancement measures, including measurable biodiversity net gain.

Clearly, the ecological assessments of the site, comprising large areas of semi-improved pasture with a network of valuable hedgerow and mature trees, have not been adequate, nor provided clarification regarding biodiversity impacts.

As a Tree Wardens group we have concentrated on those aspects of the planning application that will adversely affect significant trees and hedgerows. We do however

have concerns that no serious consideration has been given to other ecological impacts of the proposed development and how displaced species would be affected.