

Comment from Havant Borough Tree Wardens

Stance: Object

This site has been deliberately excluded from the draft local plan by Havant Borough Council because the location was considered too remote from facilities.

The consultants from WYG said at the Development Consultation Forum in April 2019 that no trees would be felled for this development. However, it is clear some trees and hedging along Hulbert Road would need to be removed in order to widen the road sufficiently to include a third lane for right turns into the site by southbound traffic.

A large number of trees and groups of trees are shown on the Tree Locations Plan as high or medium risk. A Tree Schedule, referred to as Appendix 1 to the Tree Condition Survey and Preliminary Report, has not been made available and there is no explanation of what these trees are, why they have been placed in these risk categories or what action is proposed.

As noted by the HBC Landscape Architect, 'The SUDs provision in the south east corner cannot impact on the RPA of the TPO trees south of the site.' We would go further and recommend relevant British Standard guidance is followed, especially regarding root protection areas, fencing and protected areas. This must be established for all mature trees to be retained on the site.

If the development is approved, any mature trees removed need to be replaced by an equivalent number of trees that will be allowed to grow to a similar mature size. Bearing in mind it will take decades for the mature size to be achieved, we propose three trees be planted for each mature tree removed, in order to mitigate some of the habitat destruction and ecological services such as flood mitigation and carbon sequestration provided by the trees removed. There needs to be a planning condition to ensure proper planting and maintenance with casualties replaced for five years.

The proposed development site includes SINC Ref HV0035 known as Hulbert Road Meadow (2.83 hectares).

- ◆ SINC Criteria 2D - Grasslands which have become impoverished through inappropriate management but which retain sufficient elements of relic unimproved grassland to enable recovery.
- ◆ SINC Criteria 5B Fens, flushes, seepages, springs, inundation grasslands etc. that support a flora and fauna characteristic of unimproved and waterlogged (seasonal or permanent) conditions.

The land to the north of the proposed development site is Neville's Park West Wood, SINC Ref HV0033 (4.51 hectares).

- ◆ SINC Criteria 1B - Other woodland where there is a significant element of ancient semi-natural woodland surviving.

Trees in Neville's Park West Wood are protected by area TPOs.

Although the proposal does not require trees in Neville's Park West Wood to be felled, building up to the woodland will have an impact on how it is used by wildlife. The meadow acts as a buffer to the woodland and if that buffer is effectively removed, the outer edge of the woodland will become the new buffer area and wildlife will retreat further into the woodland.

There has been a worrying trend in recent years of development applications on SINC sites. This is in conflict with the Government requirement to map and consider ecological networks in plans, policies and decisions, referenced several times in the National Planning Policy Framework 2018. These sites have been designated as Sites of Importance for Nature Conservation for a reason and they also have special importance in providing coherent ecological networks.

Green spaces need to be connected to each other to create corridors that allow our depleted species to move safely to the places they require for food, nesting, breeding etc. Without these basic, joined-up networks of habitat, our wild creatures will struggle to cope with the demands of a changing climate and decline more quickly towards local extinctions.

This development would entirely disconnect Neville's Park West Wood from the woodland to the north of B&Q, which is also a SINC with TPO trees, and further fragment green spaces.

None of the documents posted on the HBC Planning Portal as tif files could be read. This includes:

- ◆ Ecological Appraisal
- ◆ European Site Avoidance & Mitigation Checklist
- ◆ Habitats Regulations Assessment
- ◆ Phase 1 Geoenvironmental Assessment
- ◆ EIA Screening Opinion Request
- ◆ Reptile Survey Report

It is known that the area around this site is used by several species of bat and it is likely that the proposed development site is used for foraging. There is no reference to bat surveys or the impact this development would have on bats. All 18 species of UK bats are protected in law.