

Dear Lesley,

APP/19/01226 | Construction of 44 dwellings with access, open space, landscaping and associated works. | Land west of Coldharbour Farm Road, Emsworth 20.1029

Thank you for consulting me on this application. Please accept my apologies for the delay in responding to you.

The application is accompanied by an Ecological Impact Assessment (Lizard, July 2019). The application site comprises two fields of poor semi-improved grassland which have been subject to horse grazing. The site boundaries and an internal ditch are bordered by dense native scrub. The eastern site boundary is formed by a narrow stream which is also a Site of Importance for Nature Conservation (SINC), designated due to the presence of a County Rare plant, narrow-leaved water plantain (last recorded within the southern end of the stream channel in July 2011). The entire application site has been subject to botanical survey by the Hampshire Biodiversity Information Centre (HBIC) in 2001 and 2010/11. The two fields are not of especially high botanical value, although HBIC surveys of the eastern field recorded two old meadow indicator species in 2001. Neither field was considered to be of SINC quality, although they are contiguous with two SINC grassland fields located to the north and the eastern field is included within the current Ecological Network Map for Hampshire.

The site is considered to offer limited potential for protected species: a reptile survey in 2019 recorded no animals. The boundary hedgerow and scrub are clearly suitable for a range of nesting bird species and bat species are highly likely to forage/commute around the site. I would request some clarification as to why bat activity surveys were not considered necessary at this site: bats are certainly present locally and would presumably utilise areas of open ground such as the two fields and their boundary vegetation.

The proposals for the easternmost field require some further consideration. Presumably the creation of flood alleviation embankments here, plus the proposed seeding of wildflower meadow grassland, would require the removal of vegetation and the movement of soils: no details are provided so it is unclear what is proposed here. This would be on land immediately adjacent to the SINC stream (which drains into an internationally- and nationally-designated site) and, to my mind, would at least raise the potential for impacts via run-off of exposed soils during construction and until any new seeding has established. Further detail on the potential impacts of these major landscaping works on sensitive habitats and species is required at this stage.

The ecology report essentially contains no firm details of proposed mitigation, compensation or enhancement measures, although some information is presented within the submitted Landscape Strategy. Overall, the level of detail on mitigation, compensation and enhancement is insufficient for a full planning application. I would expect at least an outline ecological mitigation strategy to be included, providing details of the location and composition of habitat enhancement works (e.g. the proposed flood alleviation meadow, hedgerow bolstering) and the methods and timings of any works with the potential to impact existing ecological features.

NPPF, Circular 06/2005 and Natural England Standing Advice on Protected Species, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the LPA prior to determination, particularly in the case of protected species, which are a material planning consideration. This will enable the LPA to determine the application on the basis of full knowledge about the ecological impacts of the proposal and to ensure that any impacts can and will be mitigated and are acceptable.

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

Kind regards,

Tristan

Tristan Norton

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