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From: Norton, Tristan <Tristan.Norton@hants.gov.uk>
Sent: 14 February 2020 07:48
To: Wells, Lesley; Weaver, Steve
Cc: Havant Planning and Development Mailbox New
Subject: APP/19/00768 | Erection of 16 new dwellings with associated access, parking and open space. | Land to the rear of, 15-27 Horndean Road, Emsworth 19.1626

Dear Lesley,

APP/19/00768 | Erection of 16 new dwellings with associated access, parking and open space. | Land to the rear of, 15-27 Horndean Road, Emsworth 19.1626

The application is accompanied by a Briefing Note (Ecology Solutions, January 2020) which provides a response to my previous consultation comments dated 6 January 2020. I will also address the submitted Briefing Note: Consideration of SINC Status (Ecology Solutions, November 2019). I have held discussions with the HBIC botanists and discussed in detail the site itself and the SINC system more generally. In summary, I maintain the view that the site is and should remain a SINC based on the presence of semi-improved grassland. Whilst recognising that the value of the grassland within the site is not exceptional, the purpose of the SINC system is not simply to retain the exceptional but to highlight and protect the once-commonplace habitats that have largely vanished from the countryside. The site, and the adjacent SINC grassland, are notable in the context of the immediate landscape in retaining a semi-improved grassland habitat. The proposal would result in the permanent loss of most of the SINC with minimal compensation. The management of the retained area of SINC is proposed to provide suitable compensation plus additional net gain: I do not agree with this conclusion.

I should like to clarify my comments relating to the 'quality' of ecological survey assessment undertaken by the applicant's consultant and any perceived criticisms. I have repeatedly stated that I do not have a fundamental issue with either the scope or quality of ecological assessment carried out at the site. I have been in regular contact – by email and telephone – with Ecology Solutions and have discussed and agreed the scope of ecological site surveys throughout. I have also repeatedly maintained that the botanical assessments carried out by Ecology Solutions and HBIC have arrived at broadly similar conclusions in terms of habitat composition i.e. semi-improved grassland. The perceived criticism appears to derive from my explanation of the differing interpretations of these botanical surveys and how this relates to the 'value' of the SINC status. It is uncontroversial to highlight that Ecology Solutions take a different view on the relevance of the SINC designation than that of HBIC or I: that seems self-evident. Whatever views Ecology Solutions have on the quality of the SINC or the validity of its designation, it is a SINC nonetheless. The Hampshire SINC system is well-developed and established and based on detailed survey works carried out by highly-experienced botanists with an intimate knowledge of Hampshire's habitats. As I have stated previously, the value of SINC is enshrined in local and national planning policy and guidance and these are material considerations for the LPA.

Value of SINC grassland

HBIC have carried out botanical assessments of the site in 2001 and 2011 and again in 2019. The 2019 HBIC survey report concludes that the grassland is semi-improved habitat but has become gradually coarser in character (i.e. dominated by certain coarse grass species) over time with diminishing herb content: HBIC state that this change has not significantly altered the wildlife value of the site and that the SINC status remains valid. HBIC's remit is not to provide judgement on whether or not planning proposals should be granted permission but rather to advise on the condition of SINC habitats and offer objective advice on improving/enhancing their botanical

interest. HBIC's report concludes that whilst the SINC grassland habitat is not an exceptional example of such, with the correct management the botanical value could be enhanced/recovered: this is consistent with the SINC criterion 2B. It is HBIC's view that the site is still worthy of its SINC designation under criterion 2B.

HBIC confirm that the 2B criterion is designed to include the range of semi-improved grasslands found across Hampshire and not solely Lowland Meadow Priority Habitats – the applicant's ecologist is correct in stating that neither of the grassland communities recorded in recent surveys would qualify as Lowland Meadows Priority Habitat. The issue is that SINC criteria do not rely on the presence of Priority Habitats. The 2B SINC will inevitably include some that do indeed contain characteristics of obvious relic unimproved grassland (such as here) and some which do not. The presence of several old meadow indicator species at this site shows that the grassland retains elements of habitat that has not been subject to agricultural improvement and indeed the initial assessment stated that these species 'strongly suggest' former unimproved grassland.

The composition of the grassland has changed somewhat over time: this is to be expected due to the varying influences of management (or lack thereof), hydrology, climate and seasons and does not render the original SINC designation invalid nor confirm that the habitat value has declined over time. This is reflected in the various classifications (using National Vegetation Classification (NVC) criteria) over the years: vegetation composition changes but the site still retains semi-improved grassland with elements of unimproved habitat. The applicant's most recent assessment is that the site conforms to MG9-type grassland despite one of the constituent grass species being wholly absent from that survey and all HBIC surveys. This illustrates the problems with trying to precisely define a habitat to a specific type (habitats vary over time) and further justifies the SINC system of recognising the variations within the broad 'semi-improved grassland' criteria.

HBIC's most recent assessment states that the grassland's closest fit is MG12 with some drier elements of MG6b to the east. This is broadly consistent with the 2001 assessment, albeit with MG12 becoming more dominant. The MG12 community is usually considered to be a naturally occurring coastal grassland type, or at least occurs where there is some influence from saline conditions. The site is only c.900m distant from the fully-tidal channel at Emsworth (and the estimated limit of obvious tidal influence is noted as being the railway line c.400m south) so a saline influence to ground waters and/or the adjacent stream channel is perfectly feasible. In any case, the dominance of tall fescue grass is unusual and this grassland type is generally scarce away from the coast.

SINC protection

The current Local Plan (Core Strategy) Policy CS11 states that developed will be permitted where it:

Protects and where possible enhances the borough's statutory and non-statutory designated landscape, habitats and features of biological, hydrological or geological interest. Protection and enhancement will be achieved by appropriate adaptation and mitigation measures including wardening, education and information and the creation of new habitats, water bodies/courses planting of new trees and woodland.

The emerging Draft Local Plan 2036 Policy E14 states that development will only be permitted on or adjacent to a SINC where:

The value of the designation is retained and, where possible, enhanced in line with its original criteria for designation through avoidance and/or mitigation measures; or The benefit of the development can be shown to clearly outweigh the substantive nature conservation value of the site, and where the impact cannot be avoided nor mitigated, compensation is provided.

The underlying policy framework is therefore clear in that Havant Borough Council places significant value on its network of SINC's and that development within, or otherwise affecting, a SINC will be permitted only where certain conditions apply. The value of SINC's and other locally-designated sites in providing essential ecological infrastructure is recognised at the national level also. NPPF states that planning decisions should seek to protect and enhance protected sites, minimise impacts on biodiversity, provide ecological net gain and establish coherent ecological networks. For the development of the SINC to be acceptable in planning policy terms there would need to be justification for the proposal that outweighs the nature conservation value of the site: this is for HBC to determine.

Compensation and Enhancement

The proposal would result in the permanent loss of SINC grassland. The mitigation proposal would result in the retention of a small 0.27Ha area of grassland and its ongoing management to provide lowland meadow habitat. The issue of compensation is not satisfactorily addressed: there is a net loss of habitat which is not compensated. Any uplift in terms of the retained portion would not outweigh the loss of 0.41Ha of SINC grassland.

Ecology Solutions have provided two separate calculations of Biodiversity Net Gain using two metrics: the DEFRA Metric 2.0 and the Warwickshire model, with both showing an increase in biodiversity value post-development. I have undertaken my own modelling of existing ecological value using the DEFRA metric and reached different results based on a different interpretation of metric variables. For instance:

- I disagree that the habitat condition is 'poor' as there is no evidence for such a conclusion. The habitat appears to be in at least 'moderate' condition for the MG12-type vegetation present. It may be considered 'poor' if judged against the apparent ideal end-point of MG5/6 habitat but the site retains semi-improved grassland and is broadly similar to that first assessed in 2001 (i.e. it has always been a mix of drier 'meadow' grassland and damper MG12-type grassland). There is no evidence to suggest the site is in poor condition so I have opted for moderate category.
- Ecological Connectivity: the site is certainly connected to other habitats of interest e.g. the two adjacent SINC's (one of which is a stream corridor) and hedgerows and so I have chosen 'moderately connected habitat'.
- The site is of 'High strategic significance' as it is both a SINC (is thus part of the recognised Hampshire SINC network and is included within the Ecological Network for Hampshire (as a Core Non-statutory site).

This has resulted in an overall baseline score of 6.88 as opposed to the applicant's 4.08 for the grassland. I would not contest the other habitat calculations although my take on connectivity and strategic significance would be relevant to those too. In any case, my calculations result in a significantly higher metric score. In terms of overall loss of grassland, my calculations result in 4.15 habitat units being lost as opposed to the applicant's 2.46.

I would also query the anticipated uplift in terms of habitat condition and distinctiveness. The proposed management of the retained area is not such that dramatic changes in vegetation composition would be expected: it will remain semi-improved grassland. In addition, the site will form an accessible greenspace for the new residents and dog walking will be allowed: might this not have some influence of the condition of grassland in the future? Can a site with full public access be said to be in optimal condition?

The argument that the future of the SINC grassland can only be secured through this development (i.e. that it provides the only incentive for retention or beneficial management) is not a fruitful one for the SINC system and has no bearing on this application. This argument could presumably be made for any SINC, resulting in a gradual diminution of valuable local wildlife sites and their

replacement with contrived or 'enhanced' habitats which score highly using a net gain matrix. It is certainly possible to 'create' more biodiversity in a smaller area and in many locations this may prove successful. Most developments do not do so by first removing existing local wildlife sites.

My views on the inclusion of this SINC within any strategic greenspace masterplan for the wider Southleigh site have been made before. Rarely is there an opportunity to plan strategic-level greenspace and it would be wholly sensible to include within such a network the few existing parcels of semi-improved habitat, especially where these are deemed to be of SINC quality.

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

Kind regards,

Tristan

Tristan Norton

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