

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) and an Ecological Mitigation & Enhancement Statement. 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. No further surveys are proposed and the ecologist considers that ecological constraints are sufficiently understood to enable mitigation and compensation measures to be determined.

Overall, there will be a net loss in grassland and scrub habitat at this site and these losses will need to be compensated, especially as the site forms part of a notable undeveloped corridor along the western edge of Emsworth. The proposed strategy entails the use of a new wildflower corridor at the eastern end of the site and the planting of new scrub and tree habitat. There is no indication of the extent of habitat loss/gain as no area calculations for losses and new plantings have been provided.

Further details have been provided in relation to proposed ecological mitigation, compensation and enhancement. This includes details of the use of silt barriers along the boundary of the stream SINC: this is an essential mitigation measure and must be secured, ideally within a Construction Environment Management Plan (CEMP). I am not an expert in flood alleviation measures and do not know if such barriers are truly effective at preventing silt-laden run-off. Existing boundary vegetation is to be retained and, where necessary, bolstered with additional native shrub plantings. The proposed flood alleviation corridor is to be seeded with a wildflower mix suitable for damper soils.

Detailed management recommendations are made in respect to the establishment and ongoing management of proposed wildflower areas. This is a long-term commitment from the applicant or their appointed agents and therefore it is essential that this is understood and that sufficient resource is provided to enable this to happen. Without the recommended management regime the ecological impacts of this development

will not be addressed. A standard grassland management regime will not be acceptable. I am also unsure how the new wildflower grassland area will be managed in terms of public access: will this area be fully accessible to dog walkers for instance? Will ongoing visitor access management be needed? Use of the site for public access will inevitably reduce its biodiversity value.

The inclusion of various enhancement features such as bat and bird boxes is welcome but I consider that a greater number is appropriate. This is a development of 44 dwellings and there is no reason why the majority of dwellings cannot be fitted with at least one feature: such features are inexpensive and can provide a tangible benefit to biodiversity.

I welcome the recommendation for sensitive lighting and would request that further details of how no/minimal lighting can be achieved.

In summary, whilst I have no overriding objection to the proposals, there are a small number of queries that would assist in being able to secure meaningful ecological mitigation, compensation and enhancement that recognises the ecological impacts of this development.

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

Kind regards,

Tristan

Tristan Norton

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