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7864: LAND AT HORNDEAN ROAD, EMSWORTH

RESPONSE TO COMMENTS RECEIVED FROM CPRE HAMPSHIRE IN RELATION TO APP/19/00768

Introduction

1. This note serves to respond to comments received from CPRE Hampshire, as detailed within their consultation response dated 6 December 2019.
2. Before addressing specific comments raised, it is important to note that Ecology Solutions have consulted with the Hampshire County Council Ecology Team (HCCET) from an early stage of scheme design. Amongst other matters, Ecology Solutions and HCCET reached in principle agreement on the scope of surveys that would be required for the site.
3. It is further pertinent to note that Ecology Solutions met with HCCET, as well as HCC officers in November 2019 to discuss the application. As part of this meeting, HCCET confirmed that the baseline information collected and submitted in support of the application was appropriate and that they have no concerns in this regard.
4. The following sections of this note consider the specific matters raised by CPRE Hampshire, in the order they were raised.

Current Core Strategy Policies

5. CPRE Hampshire draw reference to local planning policy of relevance to nature conservation at the site. They go on to state that the development proposals would result in a loss to biodiversity, however, provide no evidence in support of this conclusion. As set out in the Ecological Assessment (July 2019), the proposals will avoid net biodiversity loss and indeed offer a mechanism whereby the long-term trend of ecological decline can be reversed and the value of the site enhanced in the long-term.

Emerging Policies

6. CPRE Hampshire make reference to Policy E14 in the emerging Local Plan (2036) and note the protection to be afforded to local conservation designations. As above, the development proposals offer a mechanism to arrest the declining botanical value of the on-site habitats (as have been evidenced for an extended

period), offering an opportunity for retained grassland to be restored to a high quality habitat befitting of SINC status.

7. The decline in ecological value of the grassland is acknowledged by a range of consultees, including Hampshire Biodiversity Information Centre (HBIC) and HCCET, the latter confirming to Ecology Solutions that the grassland on site is not a good example of SINC grassland. Survey work by Ecology Solutions indicates that the grassland would no longer qualify as a SINC in line with Hampshire criteria.

National Policies

8. CPRE Hampshire draw attention to specific paragraphs in the NPPF, however make no comments on whether/how they consider the development proposals to contravene these policies. For clarity, Ecology Solutions consider the development proposals to comply with relevant planning policy at all administrative levels.

Quality of the Habitat

9. CPRE Hampshire stress that a planning decision should be made on the basis of all available information, the inference presumably being that the most up-to date information should be considered. Ecology Solutions fully agree with this position.
10. CPRE Hampshire go on to draw reference to the description afforded to the SINC following a survey in 2011. This survey data is now in excess of 8 years old (well beyond it's ecological 'shelf-life') and has been superseded by updated survey work undertaken by both HBIC and Ecology Solutions (both of which were undertaken in 2019 and identify a broadly similar baseline). Of further relevance, none of the NVC communities identified within the site by HBIC and Ecology Solutions (MG6, MG9 or MG12) are identified by Natural England to be communities which would classify as 'Lowland Meadow'¹.

Hants Biodiversity Information Centre (HBIC)

11. CPRE Hampshire state that 'most' hedgerows on site would qualify as Priority Habitat. Ecology Solutions note that the development proposals would result in a net gain in native hedgerow planting and would therefore increase the extent of this Priority Habitat.
12. CPRE state that there are no grounds for deselection of the SINC. Ecology solutions refute this point. The grounds for deselection are detailed in both the Ecological Assessment (July 2019) and in a briefing note entitled '*Consideration of SINC Status for Land at Horndean Road, Emsworth*'. Both of these documents have already been submitted to the LPA.

Hampshire Bat Group

13. CPRE Hampshire set out the results of a desk study exercise to detail bat records in the local area. It is inferred that the presence of a high number of records in a wider search area is evidence that the site itself is of high value. This is simply incorrect. It is noted that CPRE Hampshire don't identify whether any of the records were recorded from the application site.

¹Lowland Grassland Management Handbook, 2nd Edition, Natural England, March 1999

14. As stated above, the scope for bat survey work undertaken at the site was agreed in advance with HCCET. HCCET have confirmed they are content with the baseline information collected in this regard.
15. CPRE Hampshire have not raised any site specific concerns in relation to potential impacts on bats. It is noted that appropriate mitigation and enhancement opportunities are identified within the Ecological Assessment (July 2017).

Ancient Tree Forum

16. All identified trees will be retained and protected as part of the development proposals, indeed despite the proposed development not having any encroachment into identified root protection areas, the gardens serving the new homes closest to retained trees have been increased in size to ensure an adequate living environment and avoid future pressure for removal. CPRE Hampshire's concerns relate to hypothetical future applications and are simply supposition. In any event, any future applications would need to be approved by the local planning authority as part of a separate application.

Quality of the Applicant's Ecological Assessment as at July 2019

17. CPRE Hampshire set out their concerns in relation to the Ecological Assessment (July 2019) submitted in support of the scheme.

Bats

18. Concerns are raised in relation to bats (referencing to paragraphs 4.3.2 – 4.3.13 of the Ecological Assessment). Many of these concerns amount simply to sweeping statements and unsubstantiated claims. As set out above, the scope of bat survey work was agreed in advance with HCCET. This scope was agreed in principle on the basis of a range of factors (including the size of the site), as is best practice.
19. The Bat Conservation Trust make clear in their guidance that '*professionals should take a proportionate approach to ensure the provision of information ... appropriate to the environmental risk*'. A proportional approach has been taken in this instance, as is agreed by HCCET. Again, CPRE Hampshire have not raised any site specific concerns in relation to how the development proposals may have the potential to adversely impact on bats.
20. For clarity, the search area utilised for the desk study was a 2km radius from the centre point of the site.

Flora / Habitats

21. CPRE Hampshire criticize the presentation of botanical data within the Ecological Assessment and in particular that '*The report does not mention the presence of other old meadow indicators previously recorded and capable of re-emergence with the reversal of a period of neglect*'. In fact, these species are considered at section 5.2.7 of the Ecological Assessment.
22. Section 3 serves to summarise the current baseline, as is required as best practice for ecological surveys. Section 5 of the report gives regard to the historic interest

of the site and indeed identifies mechanisms whereby this interest can be restored through the proposed development.

23. In regards reptile surveys, best practice does not require surveys to be undertaken at specific times of day. Whilst early mornings or evenings are more likely to be suitable, it is the weather conditions which are of primary importance. All surveys were undertaken in suitable conditions and in line with best practice. The surveys were all undertaken in the early mornings (between 06:50 and 10:25).
24. CPRE Hampshire make sweeping statements in relation to potential nitrate impacts and state that the Ecology HRA [sic] is largely 'irrelevant' to the site. The HRA report has been prepared specifically for the scheme and to assess all potential impacts, as is required by legislation and case law. That CPRE Hampshire consider this document to be irrelevant suggests they have very limited understanding of the Habitat Regulations 2017.

Conflict with KP5, Southleigh in the Local Plan 2036

25. The Denvilles Masterplan (December 2017) is a 67 page document which is an evidence base to the Policy KP5 in the emerging local plan. The masterplan has been produced by Levitt Bernstein as consultants to Havant Borough Council. It includes a policy overview, contextual analysis and character study before setting out an opportunities and constraints process for the site area. It then summarises the community engagement process before explaining how all of this information informs the design principles for the masterplan framework itself.
26. The masterplan is referenced extensively in policy KP5 and its supporting text. It is made clear that any planning application needs to come forward in accordance with the 2017 masterplan.
27. For clarity, the masterplan identifies for residential development the area of land subject to the current planning application by Metis Homes. It describes in detail the opportunities and constraints led process which has led to its selection as such and identified it as appropriate for an 'average' density of housing, as is now proposed.
28. The plan which is incorporated within the CPRE letter of objection is misleading. It has been selected from the community engagement section as one early draft option for development of the site. The masterplan document clearly demonstrates an evidence led process within which community engagement was considered as one of the layers. The resultant final masterplan framework plan illustrates a central spine road, to the east of which is a large linear park and green corridor. Beyond this to the eastern edge lies the site which is the subject of the current Metis Homes planning application. This site is identified for residential development within the masterplan.
29. The emerging local plan is at an advanced stage of its production and as such has gathered significant weight as a material consideration. Policy KP5 and the associated framework masterplan identify the subject site as appropriate for an average density of residential development.

Conclusion

30. This note has been prepared in response to concerns raised by CPRE Hampshire in relation to the development proposals at Horndean Road (ref: APP/19/00768).

31. The concerns raised in relation to survey methodologies and data presentation are of no merit and indeed contrast with the views expressed by HCCET. Broad statements are made by CPRE Hampshire in relation to policy compliance and impact, however these points are not substantiated with evidence or specific justification.
32. In contrast, the conclusions reached by Ecology Solutions are based on the most up to date survey work available, following best practice methodologies and a scope of surveys agreed with HCCET.
33. These surveys confirm that the application site is ecologically impoverished and indeed that its ecological value has continually declined over the long-term due to an absence of biodiversity led management. This absence of management is not malicious, it is simply a result of inactivity at the site. Appropriate management not only costs money but often requires specialist input. The reality is that most landowners are unable to deliver appropriate biodiversity management for these reasons.
34. Without the proposed development, it is highly likely that the trend of botanical decline would continue at the site. In this sense, refusing development would not safeguard the grassland. In contrast, the development proposals offer a mechanism to retain, manage and enhance a component of the 'SINC'. This would ensure its retention in perpetuity. This is a significant positive of the development proposals and something that is unlikely to be secured in the absence of the proposed development.