

Ecology Solutions Limited
Farncombe House
Farncombe Estate
Broadway
Worcestershire
WR12 7LJ

+44(0)1451 870767
info@ecologysolutions.co.uk
www.ecologysolutions.co.uk



7864: LAND AT HORNDEAN ROAD, EMSWORTH

BRIEFING NOTE: RESPONSE TO CONSULTATION RESPONSE RECEIVED FROM THE HAMPSHIRE COUNTY COUNCIL ECOLOGY TEAM

Introduction

1. This briefing note seeks to respond to the consultation response received from Tristan Norton, Senior Ecologist within the Hampshire County Council Ecology Team (HCCET). The consultation response relates to the development proposals for land at Horndean Road, Emsworth (planning ref: APP/19/00768) (the Proposed Development).
2. The consultation response received from HCCET follows extensive correspondence between HCCET, Ecology Solutions and the applicant, alongside attendance at meetings and the submission of a series of documents by Ecology Solutions to Hampshire County Council.
3. At a meeting in November 2019, HCCET identified that the status of the site as a SINC was the primary ecological consideration for the planning application. A previous briefing note entitled '*Consideration of SINC Status for Land at Horndean Road, Emsworth*' sought to consider the SINC matter in detail.
4. It now appears that the primary issue for HCCET is for a Biodiversity Impact Assessment Calculator (BIAC) to be submitted for the scheme. On this basis, a BIAC has been produced and is submitted alongside this briefing note. This is further discussed in the following section of this report.
5. It is noted that HCCET have not addressed technical queries made by Ecology Solutions in a previous briefing note entitled '*Consideration of SINC Status for Land at Horndean Road, Emsworth*'. These technical queries are of particular significance in this case as they bring into question the validity of the SINC designation for the site. This matter is further considered in subsequent sections of this report.

Biodiversity Net Gain

6. HCCET have requested that evidence is provided to demonstrate that the proposed development can deliver a 'net gain' in biodiversity. They have

requested that this net gain be demonstrated through the use of a Biodiversity Impact Assessment Calculator (BIAC).

7. BIAC tools are metric based assessments that use habitats as a 'proxy' for overall biodiversity value. BIAC tools essentially attribute a value to individual habitat types based on a constrained set of inputs such as their 'size', 'condition' and 'distinctiveness'. These tools are by their nature simplistic and are not an adequate replacement for professional judgement. Despite significant limitations, BIACs can be useful tools in informing scheme design and mitigation, when considered alongside detailed evaluation within technical reports.
8. Ecology Solutions have produced a BIAC for the scheme using two different calculators, the 'DEFRA Metric 2.0' and the 'Warwickshire model'. Both of these calculators, which are widely used and accepted for metric based assessments, demonstrate that the Development Proposals can achieve a net gain in biodiversity, with positive scores of **0.01 units** and **1.31 units** respectively. Both calculators are submitted alongside this response note.
9. As can be seen, and despite inputting identical habitat areas, the two BIACs output notably different scores, with DEFRA identifying a very small positive score (**approx. 0.28% net gain**) and Warwickshire a large positive score (**approx. 39.34% net gain**). The variation in score further serves to demonstrate that these calculators are simple estimating tools, within which minor differences in calculator design can have notable impacts on the score.
10. In this case, the variation in score is largely a result of one 'multiplier' known as 'time to target condition'. This 'multiplier' alters the score of a 'created' or 'enhanced' habitat. In simple terms, the longer a habitat takes to reach target condition, the lower the score that habitat achieves in the calculator. In the Warwickshire Calculator, users can alter the 'time to target condition' multiplier based on their own professional judgement. In the Warwickshire calculator, we set the 'time to target condition' to 10 years for the neutral grassland. In the DEFRA calculator, this multiplier is fixed at 15 years for neutral grassland (lowland meadow).
11. 10 years is deemed to be an easily achievable timeframe for delivering neutral grassland in good condition at this site and indeed an even shorter timeframe would likely be achievable. This conclusion is based on several site specific factors, not least the suitability of the soils on site (as evidenced through the historic condition of the grassland). Indeed, it was acknowledged by HCCET during a meeting in November 2019 that the habitats on site would be relatively straightforward to restore to a desirable condition.
12. In summary then, both BIACs clearly assist in demonstrating that the Development Proposals can ensure a net gain in biodiversity at the site, as is further evidenced and justified within the submitted Ecological Assessment. It is therefore clear from the documentation prepared and submitted by Ecology Solutions, which includes the Ecological Assessment, the briefing note entitled '*Consideration of SINC Status for Land at Horndean Road, Emsworth*' and the two BIACs that the Development Proposals can deliver ecological enhancements at this site and in the process mitigate any impacts upon the existing 'SINC', as required through local and national policy.

SINC Status

13. In their consultation response, HCCET confirm that they are content with the baseline survey work undertaken in support of the planning application. However, HCCET go on to state that *"it (perhaps understandably) tends to downplay the botanical value of the grassland"*.
14. Ecology Solutions strongly disagree with this statement. It is extremely disappointing that HCCET have sought to undermine the integrity of ecological consultants as a profession, inferring that there is perhaps an element of bias to the conclusions reached. The survey work and reporting undertaken by Ecology Solutions has aligned with best practice methodologies throughout, with site based survey work combined with detailed desk study information to provide a detailed baseline situation for the site and a thorough evaluation of the habitats present.
15. In respect of the on-site grassland (i.e. the habitat for which the 'SINC' is dedicated), the ecological evaluation has been based on a robust suite of survey works, including a National Vegetation Classification (NVC) survey undertaken at the optimal time of year for grassland (i.e. between June and July) alongside the review of historic survey data for the site. This has allowed for evidence based conclusions to be drawn not only on the current condition of the grassland, but also on the ecological trends over an extended period. Where necessary, conclusions are further supported by reference to appropriate literature, including that produced by Natural England as well as Hampshire's own *'Criteria for selecting Sites of Importance for Nature Conservation in Hampshire'*.
16. In contrast to the approach adopted by Ecology Solutions, it is unclear whether the survey work and evaluation undertaken by HBIC (Hampshire Biodiversity Information Centre) has been subject to the same rigour. The HBIC botanical survey was undertaken in September and therefore outside of the most optimal period for grassland. It is also unclear whether an NVC survey was undertaken by HBIC, or whether habitat classifications were loosely based on survey data collected through the DAFOR approach.
17. It is understood that, on the basis of the information collected by HBIC, they have concluded that the site should remain as a SINC. Ecology Solutions have already raised technical concerns with this conclusion in the briefing note entitled *'Consideration of SINC Status for Land at Horndean Road, Emsworth'*. To date, we are not aware of these concerns having been addressed either by HCCET or HBIC. It therefore remains unclear to Ecology Solutions what technical or botanical justification there is to maintain a SINC designation at the site.

Planning Policy (SINC Protection)

18. The matter of SINC protection is raised within the consultation response received from HCCET. Amongst other matters, HCCET clarify the protection that should be afforded to non-statutory sites (such as a SINC) to ensure compliance with adopted and emerging planning policy.
19. Ecology Solutions gave careful consideration to planning policy of relevance to nature conservation at the site within the Ecological Assessment submitted in support of the Proposed Development. As part of this assessment work, Ecology Solutions concluded that impacts upon the 'SINC' could be appropriately mitigated

through the implementation of a habitat restoration and management plan for a retained subset of the grassland. This conclusion has since been reaffirmed through the completion of the BIACs submitted alongside this note.

20. On the basis of the above, noting that a net gain in biodiversity can be achieved through implementation of the Proposed Development, it is considered that the Proposed Development fully accords with planning policy pertaining to nature conservation at all administrative levels.

Other Matters

21. HCCET raised a small number of additional matters in their consultation response. With the exception of the Appeal Decision, these matters have been addressed previously (either in written responses or meetings). Nonetheless, brief consideration is given to these points below for completeness.
22. **Masterplan.** In their response, HCCET reiterated their view that a strategic approach to development would “*hopefully*” allow for the creation of “*more meaningful ecological networks*”. As discussed in the previous briefing note, the emerging masterplan for the Southleigh application identifies the site as a developable area (as opposed to an area of greenspace). It is unreasonable to compare the Proposed Development in this instance with a hypothetical plan in which greater ecological enhancement is feasible.
23. **Open Space Management.** In their response, HCCET query whether a private management company would be able to “*maintain the specific management requirements in the long-term*” such that the quality of any retained grassland could be enhanced. This appears to be a broader query about the principle of SINC management and the same question would arise even in the event that the site came forward as part of the wider Southleigh allocation.
24. In any event, there is no reason to consider that a private management company (for example) could not undertake appropriate management and indeed the LPA will be well aware that many SINC sites are successfully managed by private individuals. In this case it is the intention that appropriate grassland management be set out by Ecology Solutions, with the management plan approved by the LPA as part of a planning condition. Monitoring surveys could be additionally conditioned as part of any consent, if the LPA required further reassurance in this regard.
25. The land in question will be openly available to the public, ensuring that interested parties such as HBIC can continue to monitor the grassland if they wish, as they do periodically for all Hampshire’s SINC sites.
26. **Appeal Decision.** In their response, HCCET make reference to a recent Appeal Decision in Southampton (planning ref: APP/A1720/W/18/3209865). In that case, the Inspector concluded that the loss of grassland would not be compensated for by the management of a remainder of the land, nor provide a net gain in biodiversity. This contrasts with the Proposed Development where a net gain in biodiversity can be demonstrated, both for the wider site and in specifically in relation to the on-site grassland. During previous meetings, HCCET have acknowledged their view that a biodiversity net gain is likely to be achievable at the site.

Summary and Conclusion

27. This note responds to the consultation response received from HCCET in respect of the Proposed Development of land at Horndean Road, Emsworth. It should be read alongside previous documentation prepared by Ecology Solutions and submitted for the scheme, including the Ecological Assessment for the site (2019) and the briefing note entitled '*Consideration of SINC Status for Land at Horndean Road, Emsworth*'.
28. At the request of HCCET Ecology Solutions have undertaken BIAC work for the site. This assessment work has been undertaken using two widely accepted calculator tools, the DEFRA Metric 2.0 and the Warwickshire calculator. Both these tools agree with the conclusion of the Ecological Assessment (2019) for the site that the Proposed Development would be capable of securing a net gain in biodiversity.
29. Noting that a net gain in biodiversity can be achieved, with much of this gain attributable to the retention and enhancement of an area of neutral grassland, it is clear that habitat losses to the area currently designated as a 'SINC' can be sufficient mitigated in biodiversity terms, ensuring compliance with planning policy.
30. In any event, for the reasons set out in previous submissions, Ecology Solutions remain concerned that the SINC designation for the site lacks validity. No new information has been provided to address the previous concerns raised by Ecology Solutions in this regard.
31. As concluded previously, the Development Proposals offer a mechanism to retain, manage and enhance a component of the 'SINC', ensuring 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.