

From: Alistair Harris [<mailto:Alistair.Harris@metishomes.co.uk>]

Sent: 14 January 2020 10:57

To: Weaver, Steve <Steve.Weaver@havant.gov.uk>; Boulter, Jacqueline <Jacqueline.Boulter@havant.gov.uk>; Wells, Lesley <Lesley.Wells@easthants.gov.uk>

Subject: RE: Land Rear of 15-27 Horndean Rd, Emsworth

Dear Steve / Jacqui / Lesley

Further to the consultation comments provided by Tristan Norton last week I am pleased to provide a full response, as prepared by the project ecologist.

Tristan had questioned within his commentary whether the retained ecological area at the site would be of sufficient habitat quality to compensate for the element of the site proposed for development. He went on to request that the project ecologist provide evidence to demonstrate that net gain can be achieved.

Attached to this email are:

- A comprehensive written response to the questions raised by Tristan Norton;
- A completed 'DEFRA Metric 2.0' biodiversity calculator – **which demonstrates on site net gain;**
- A completed 'Warwickshire Model' biodiversity calculator – **which demonstrates on site net gain.**

The attached evidence demonstrates that the proposed development may be delivered whilst ensuring on site biodiversity net gain.

Whilst these assessment tools do provide a tangible measure of biodiversity, there is a wider biodiversity benefit which they overlook. As previously set out at length, whilst the project ecologist's position is that the site has already dropped below the botanical value to qualify as a SINC in Hampshire, to take no action now will result in the further deterioration of the indicator species to the extent that it cannot be questioned that the SINC will be lost. There is no disagreement that this site will be developed as part of a housing scheme in the coming years. If the Metis application is rejected and a volume housebuilder gains control of the site in the future, with a view to delivering it as part of the wider Southleigh allocation (as is suggested by the policy position), it is very likely that the SINC status will have degraded to a point of de-allocation. In this scenario, the developer will at that time have no obligation to offer and fund a management strategy to seek to re-instate the indicator species. The offer to design and fund a biodiversity management regime is on the table now and presents a strong material planning consideration.

In terms of the Metis Homes planning application meeting the tests of adopted policy, granting planning permission now will retain and enhance the original designation (as opposed to its value being lost), through a demonstrable on site biodiversity net gain alongside a mechanism to safeguard the long term future status of the SINC. This to my mind presents a positive policy context for determination of the current planning application.

I would be very grateful if you would place the attached information with the planning application pack and consider its content as a further strong material consideration in support of the proposed development.

Kind regards

Alistair



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From: Alistair Harris

Sent: 25 November 2019 12:04

To: Weaver, Steve <Steve.Weaver@havant.gov.uk>; Boulter, Jacqueline

<Jacqueline.Boulter@havant.gov.uk>; Wells, Lesley <Lesley.Wells@easthants.gov.uk>

Subject: RE: Land Rear of 15-27 Horndean Rd, Emsworth

Dear Steve / Jacqui / Lesley

I wanted to drop you a line to say a huge thank you for taking time out of your busy schedule last Thursday to meet with us and discuss the above development.

I thought it might be helpful to provide a summary of matters on which all parties seemed to agree, noted below. I am also intending to provide a more detailed note on the specific ecology discussion, once we have agreed its content directly with Tristan.

It is common ground that:

- The application site is allocated for housing within the emerging local plan under Policy KS5;
- The evidence base to the plan and specifically Policy KS5 includes a comprehensive opportunities and constraints led masterplan which identifies this land parcel for development;
- The Metis Homes planning application has met with no material objection from all other statutory consultees and is acceptable in development control terms
- The current objection from planning policy is the only matter preventing a positive recommendation from officers, the objection is sustained on the basis of an unacceptable impact on the SINC designation and lack of adequate mitigation within the land Metis control;
- A comprehensive suite of ecological survey data exists for this site collected over a number of years;
- It was agreed in our meeting that the data collected by Ecology Solutions and HBIC are consistent and demonstrate a continued deterioration of the SINC indicator species at the site;
- The SINC indicator species will in all likelihood continue to deteriorate with a high probability of being completely lost based on the documented evidence to date, if no action is taken by way of positive management of the land;
- The Metis Homes planning application offers to design and fund the implementation of a bespoke site specific management regime which is offered on grant of planning permission and delivered thereafter in perpetuity;

- This approach along with the other ecological enhancements proposed has the ability to mitigate and positively enhance the ecological value of the site and to improve and safeguard the value of the SINC and its designation as such in perpetuity;
- In the absence of positive management and continued deterioration of the site, there is a significantly high chance the SINC status could be lost. In this context, any future developer seeking planning permission will be under no obligation to offer the management regime and enhancements now proposed by Metis;
- The ecological enhancements of the wider Southleigh allocation, (beyond the Metis red line) can in any event be delivered through the wider Southleigh development, regardless of whether the Metis land is developed in advance of this or not.

I absolutely understand the wish to protect the ecological value of the site and wider land.

The Metis application offers an opportunity to deliver a high quality bespoke development in the immediate term which can deliver adequate mitigation and indeed enhancement of the biodiversity at the site (within the red line). To take no action now will result in the further deterioration of the indicator species to the extent that the SINC will almost certainly in time be lost and de-allocated. There is no disagreement that this site will be developed as part of a housing scheme in the coming years. If the Metis application is rejected and a volume housebuilder gains control of the site in the future, with a view to delivering it as part of the wider Southleigh allocation (as is suggested by the policy position), it is very possible that the SINC status will have degraded to a point of de-allocation. In this scenario, the developer will at that time have no obligation to offer and fund a management strategy to seek to re-instate the indicator species.

The mechanism to secure the necessary management regime is on the table now as part of the Metis application. The suggestion that the application should be refused to protect the SINC is at odds with the fact that if the application is refused, in all probability the SINC will be lost in perpetuity.

To my mind, to seek to protect a SINC by taking no action, thereby leading to a high risk it may be lost altogether, defies all logic.

With all of the above in mind, the mitigation of the development and associated ecological enhancements proposed which will preserve the SINC status in perpetuity rather than risking its loss, is a strong material consideration in support of the application.

Further, it would also seem possible to include amongst the imminent amendments to the pre-submission Local Plan, a form of wording which demonstrates that the development of this site ahead of the wider allocation does not represent an example of 'nibbling'; it is demonstrable that its development can improve the current ecological value and not adversely affect the wider allocation, but moreover, I would refer to the key points made in our representations, which have remained consistent throughout. In short, development ahead of the wider allocation should not be considered "nibbling" because this site has its own independent access (as now approved by highways officers) and equally the site is completely physically separated from the rest of the allocation via flood zone 3, a watercourse/ditch and a retained tree belt. It would therefore seem to be a very strong case for resisting any argument that this would be setting a precedent.

I sincerely hope all this could now pave a way to an officers recommendation for approval, in line with the contractual obligations of our business as explained at the meeting last week and set out within a subsequent separate note.

I hope that this note is a useful summary to help bring into focus the key issue and would be very happy to discuss or clarify any aspect further at your convenience.

Thanks again for your ongoing assistance with this project.

Kind regards

Alistair



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