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5th September 2022

Dear Sir/Madam,

RE: APP/21/00989 – Cabbagefield Row – Application for 150 dwellings

We apologise for not responding sooner on the revised planning application. Please find our response below:

Portsmouth Water maintains its objection to the proposed Cabbagefield Row development. Whilst the buffer to the ancient woodland has been increased and the Biodiversity Net Gain (BNG) report acknowledges that additional off-site compensation will be required there remains insufficient information supplied to confirm that the Scheme will not have an adverse effect on the ancient woodlands that form part of the compensation package for the Havant Thicket Reservoir (HTR) scheme (Bell's Copse and Havant Thicket woodland) and protected species, particularly dormice and bats.

The widened buffer adjacent to the ancient woodland along the eastern edge of the Site (Ecology and Landscape Plan, 28079-PD122B) is an improvement on the previous design but is nevertheless, only the minimum buffer recommended by Natural England. Natural England and Forestry Commission standing advice recommends that developers need to consider the size and type of buffer zone depending on the scale and type of development and its effects on ancient woodland and the character of the surrounding area. The proposal is for a large-scale residential development and therefore the minimum may not be sufficient. The Ecology and Landscape Plan does not show that mixed scrub will be created in the buffer zone (illustrated in the BNG report) so the Ecology and Landscape Plan will require updating to ensure this is done.

The BNG report concludes that 'with the current proposals, the existing scheme will result in a net unit change of +1.24, which represents a biodiversity net gain of 1.86%'. This is significantly less than the minimum of 10% that will become mandatory under the Environment Act 2021 in November 2023. The report also acknowledges that there will be a net loss of 2.11 hectares of scrub habitat, which is an important habitat for protected species known to be at the site, including hazel dormice, bats and nesting birds. Local dormouse, bat and bird populations have already been subject to habitat loss in relation to the adjacent HTR development, with the woodlands surrounding the Cabbagefield Row development site (i.e. Bell's Copse and Havant Thicket woodland) already subject to habitat enhancement for animals displaced from the reservoir footprint. It is stated that offsite compensation will be discussed with the Local Planning Authority during the planning process. This should be done prior to determination to ensure the development can take place without causing an offence in relation to legally protected species.

The Tree Constraints Plan (AS/AL/0721 TCP Rev A) illustrates the tree canopy overlapping the red line boundary with some of the trunks within or on the red line boundary and the Tree Survey Plan (AS/AL/0721 TSP) describes the scrub within the Site as containing a number of

species e.g. 'dense willow, ash, blackthorn and bramble scrub'. The BNG report illustrates the baseline habitat as bramble scrub right up to the red line boundary and therefore the BNG assessment may be under-representing the value of some of the habitats on site and resulting in an overestimation of how many credits can be achieved by enhancing the habitat.

The updated Site Access Plan (28079-PD123) shows a new pedestrian access to the HTR Site at the northern extent of the proposed housing development. This new access does not tie in with the approved reservoir scheme, it would cause unnecessary fragmentation and disturbance to the narrow habitat strip between the Cabbagefield Row and HTR site and require a new pedestrian access over the reservoir southern vehicular access route. Pedestrians and cyclists could access the existing Bridleway Havant 121 at this point but should access the HTR Site where bridleways Havant 121 and Havant 120 meet further north, or further south at the proposed pedestrian and cycle access off Swanmore Road. The existing footpath has been incorrectly identified as a bridleway where it heads northwards from the red line boundary (this is a permissive path) and Havant 121 is missing. It is recommended that the access arrangements within the approved reservoir scheme are included to illustrate the connectivity between the two sites.

Many of the issues raised in Portsmouth Water's previous response remain to be resolved, notably:

- 1) How the conflicting requirements of ecology and the recreational pressures from 150 dwellings will be met. Whilst it has now been acknowledged in the BNG report that off-site scrub compensation will be required (see discussion regarding this above) there may also be the requirement for other habitats, such as grassland, to be created off-site to ensure adequate compensation for these habitats and the species that rely on them.
- 2) Further detail required on the proposed habitats to be created in the buffer areas.
- 3) Further justification of the evaluation of the Site for bats, clarification of if a bat roost is present within the Site and information on the proposed lighting strategy for the scheme.
- 4) Habitats Regulations Assessment – the supplied European Site Avoidance and Mitigation Checklist does not adequately assess the in-combination effects of Havant Thicket Reservoir and other developments already underway or planned.
- 5) In addition, the proposed pedestrian connectivity to the reservoir site must be amended to tie-in with the approved reservoir scheme.

Yours sincerely



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