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Dear Sir/Madam,

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

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

We understand that a planning application for development of the Cabbagefield Row site, north of Swanmore Road in Warren Park, for 150 new dwellings (houses and apartments) has been submitted to Havant Borough Council (application ref APP/21/00989). The proposed development is adjacent to the Havant Thicket Reservoir site and is connected to it via Bridleway Havant 120.

Atkins has been asked by Portsmouth Water to consider the potential ecological impact of the development on the existing wildlife corridor and the permitted Havant Thicket Reservoir scheme.

Objection

Within the planning application, the southern part of the site is proposed for development with the northern section identified for public open space. The Ecological Impact Assessment (EclA), which accompanies the planning application, states that this open greenspace *'is likely to mitigate for any significant increase in recreational pressure on other publicly accessible SINC's in the local area'*. This open space would result in a circular walk of less than 500m and, in isolation, is unlikely to be of sufficient size for the majority of dog walkers. As Bridleway Havant 120 will provide direct access from this public open space to the Havant Thicket reservoir site, the development will result in a significant increase in daily dog walkers within the reservoir site (which includes Bell's Copse, Havant Thicket woodland and the reservoir site). Further consideration is required to reduce the potential impact of the development on the adjoining reservoir site.

Improving the quality of grassland and providing compensation habitat for reptiles and dormice alongside the recreational pressure from 150 dwellings is considered unrealistic. These proposals also have conflicting requirements:

- Dogs using the open space could kill and disturb the wildlife being encouraged to use the area;
- The anthropogenic impacts (trampling, dog fouling, littering, arson etc.) associated with recreational use of the site will make enhancement of the grassland more challenging;
- The buffer scrub planted as compensation habitat for dormice will further reduce the available reptile habitat; and

- The proposed retention of the open space as tussocky grassland for reptiles is likely to be incompatible with the management, such as grazing or mowing, likely to be required to enhance its botanical value.

Further detail of how these conflicting requirements will be resolved is sought in advance of the granting of planning permission. Without appropriate mitigation and compensation to ensure existing wildlife can be retained within the Cabbagefield Row site there would be an increased burden on the adjoining habitats within the reservoir site to support these animals. The EclA states that there will be a 15m buffer of undeveloped land to areas of ancient woodland associated with Bell's Copse SINC, Cabbagefield Row SINC and Dunsbury Hill Wood SINC. However, the development zone illustrated on the Ecology and Landscape Plan appears to show a landscape buffer averaging around 10m on the western side of the site and around 5m on the eastern boundary. This buffer appears to be almost completely within the canopy of the existing tree and cannot, therefore, be considered as compensation habitat for dormice and reptiles. The EclA indicates that the buffers will be planted with dense, thorny scrub to deter residents from accessing the adjacent area of woodland and that this scrub will provide compensation habitat for dormice. Scrub planting beneath an existing tree canopy is unlikely to be successful and reptiles require open habitat which is unlikely to be present due to the shading of retained trees and proposed planting of dense, thorny scrub. We would seek further information on the extent and composition of habitats within the proposed buffer zone.

The EclA states that *'bat foraging and commuting habitat is not listed as a criteria for SINC and therefore it is assumed that such habitat is not of county level importance in isolation.'* The absence of references to bat foraging and commuting habitat is not considered appropriate justification for not assessing the habitat as being of county value for bats. Paragraph 1.1.3 of the EclA states the site does not support roosting bats, but the potential impact section refers to an ash tree supporting a brown long-eared day roost. Clarification of the presence of bat roosts present on the site is required along with further detail on the proposed lighting strategy for the scheme.

The Habitat Regulations Assessment (HRA) undertaken to support the Havant Thicket Reservoir planning application was based on a lower density of dwellings at the Cabbagefield Row site (in line with the adopted Local Plan Policy LP1 ref UE6a). Although we understand that Policy H34 of the emerging Local Plan (June 2021) proposes an increased number of dwellings, we have significant concerns that 150 dwellings will not allow sufficient land within the development site to fully mitigate and compensate for the habitat loss and will result in adverse effects on the ecology of the adjoining habitats within the reservoir site.

Yours sincerely



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