

APP/21/00893 Land North of Long Copse Lane, Emsworth

Proposed new residential scheme for approximately 210 dwellings

I wish to object to the application for the proposed new residential scheme for approximately 210 dwellings at Land North of Long Copse Lane, Emsworth. More information needs to be submitted on how impacts on protected species will be addressed in the short and long-term before the application is determined. I am concerned that the application as it stands;

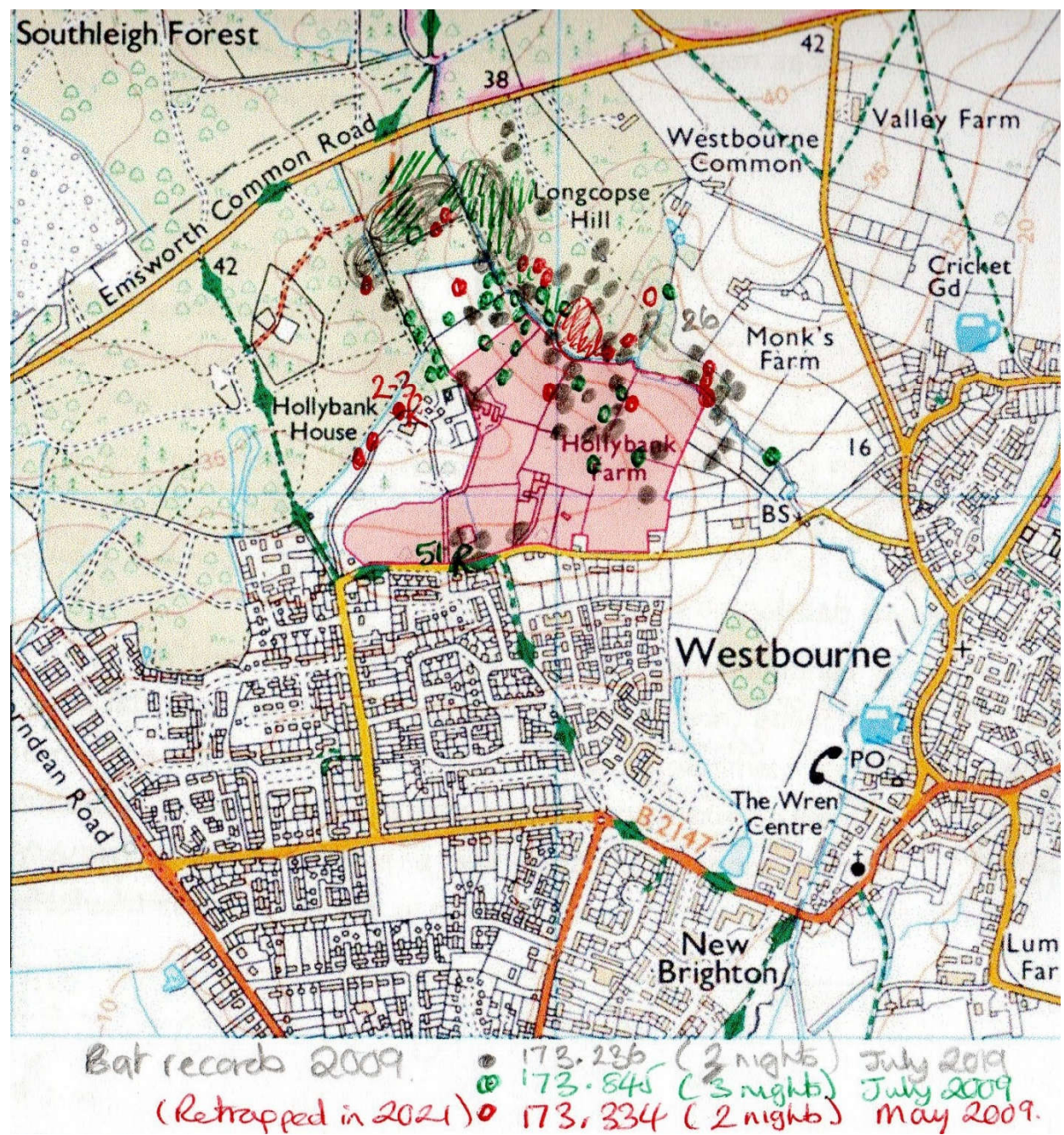
1. **Underplays the use of the proposed development site by bats for foraging.** The 2009 trap and trace maps prepared by ECOSA for P. Water show that the fields on which this development is to be located were being used by Bechstein's bats in addition to the woodland to the north and west. The ecologist for the developer has not plotted the 2009 data in the same way as he has the 2017 and 2021 data, as a result the use of the paddocks and hedgerows within the site is not highlighted. Bat surveys at a number of sites including Havant Thicket Reservoir (HTR) and Land East of Horndean (LEOH) have shown that the use of such habitats varies from year to year and this may depend on the extent to which the fields are grazed, as a result it is important that all of the data available for this site is used in the assessment. I have attached as Figure 1 a very rough summary of the 2009 survey data plotted in a similar form to the developer's data to illustrate that the paddocks and hedgerows within the site are utilised by Bechstein's bat. It is important to recognise that each Bechstein bat has its own core feeding zone which may include marginal habitats, thus data from tracking only a few bats does not provide a complete picture and all available information should be considered.
2. **Underplays the impact on the adjacent Ancient Woodland** that the residents from another 210 dwellings and their visitors will have in terms of disturbance on wildlife, including European Protected Species such as dormice and Bechstein's bat. The development will be occupied by more than 600 people and their pets. It is inevitable that without appropriate mitigation and compensation this will have an adverse impact on the adjacent Ancient Woodland. It will only add to any existing problems of disturbance to wildlife, with the addition of pets killing wildlife (birds, reptiles and small mammals), littering, fly tipping, and other anti-social behaviour. More detail should be provided by the applicant on how this will be prevented/ controlled.
3. The applicant **has not adequately considered the in-combination effects of this development with other developments** which have already been undertaken, are underway, or are being planned. The meta-population of Bechstein's bats living in the fragmented remaining habitat between the A3(M), Horndean, Westbourne and Leigh Park is having to endure landscape change to habitats and wildlife corridors in all of these areas, as a result of developments including; Dunsbury Hill Farm, LEOH, HTR, Southleigh Park, Keydale Nursery, other developments along Long Copse Lane (Emsworth). Survey work dating back to 2009 has shown that the development is in an area which is very important to the Bechstein's bat for commuting, foraging and roosting. With several roosts located around the periphery of this site recorded as having up to 51 bats in a maternity roost, the largest recorded roost in the borough. It is not credible to suggest that further loss of habitat in this area will not have an impact. **No further loss of their habitat and impacts on existing wildlife corridors should be permitted by the LPA's until a holistic landscape scale strategy has been developed and approved** by the County Ecologist and Natural England to ensure that their Favourable Conservation Status is maintained. A way of delivering and funding the work needed to protect and enhance the remaining habitats also needs to be guaranteed before further developments are approved.

4. Has **not considered the presence of the very rare Alcaethoe bat** which has been found in this area. It is listed as one of the bats potentially recorded in Section 3.1.2 of the Davidson-Watts 2017 Bat Report.
5. **Has not included a Habitats Regulation Appropriate Assessment.** Natural England have drawn attention to the need for an Appropriate Assessment to cover a range of issues including impacts on the environment, water quality deterioration (nutrient balance), increased recreation pressure on the harbours/ Solent, and protected species. In line with the requirements applied to the Havant Thicket Reservoir project to be robust **the HRA must consider the impact of the development on it's own and in-combination with other developments on habitats used by European Protected bat species**, including the Singleton & Cocking Tunnels SAC and the Ebernoe Common SAC.
6. **Given the rare status of some of the bats utilising the site it is important that a very precautionary approach is taken to any further development proposals. There is currently a lack of information on how remaining habitats including the adjacent woodland will be protected, managed, maintained and monitored in the future to;**
 - **Protect them from direct and indirect impacts, and**
 - **Guarantee the delivery of appropriate mitigation and compensation in the short and long-term.**
 - **The ecology report recommended implementation of a Management Plan for the woodland and new buffer habitat, but there is currently no binding commitment to a Woodland Management Plan (WMP) for the woodland adjacent to the site, nor the buffer zones.** The LPA & NE required P.Water to commit to a long-term WMP for adjacent woodland owned by HCC and Forestry England. A consistent approach should be taken and the applicant should be required to commit to a robust WMP for adjacent woodlands. **The funding needed to deliver the WMP in the long-term should be guaranteed through an appropriate legal agreement such as a Section 106.**
7. The developer has indicated that a net gain will be delivered. **There is a lack of detail on the proposed ecological impact, mitigation, compensation and enhancement measures that will be provided to substantiate that a net gain will be delivered.**
8. Impacts on protected species are a material planning consideration. Some outline details have been submitted for on-site and off-site mitigation and compensation which is welcome. There is a lack of detail on the habitats to be created within the proposed site buffers and off-site woodland creation areas, along with a lack of information on how they will be managed in the long-term. As indicated by Natural England a **Biodiversity Mitigation and Enhancement Strategy must be submitted and agreed with the County Ecologist before the application is determined** this is to ensure that;
 - All impacts have been fully assessed and understood in both the short and long-term.
 - A biodiversity net gain will be delivered, with creation of nesting, roosting and foraging habitat for wildlife that already uses the site, not just provision of a lot of bird and bat boxes in an urban landscape.
 - The 'Favourable Conservation Status' of European protected species can be maintained in the short and long-term.
9. Further **detail on control of lighting** should be submitted to demonstrate in more detail how dark buffer zones can be guaranteed if the development were to go ahead.
10. While there is reference to the need for ecological monitoring of the mitigation measures for a year before development commences and then at 1,3,5,8, & 12 years, there is **no information on who will deliver this.** A legally binding commitment for appropriate robust monitoring needs to form part of the strategy.

If after the submission of the missing additional information needed to address Natural England (NE) and the County Ecologists existing concerns the LPA are minded to grant outline consent, then it is essential that planning conditions are applied requiring submission and approval of further details to protect the environment before development commences of;

- A detailed Biodiversity Mitigation, Compensation and Enhancement Plan to be approved by NE and the County Ecologist
 - The Outline Strategy should be submitted now before any permission is granted to ensure that the County Ecologist is satisfied that robust short and long-term mitigation can be provided which will guarantee that the Favourable Conservation Status of protected species will be maintained post development, along with the mechanism for how mitigation/ compensation measures will be delivered, managed and monitored in the long-term. *Note; This should set out who will be responsible for management and monitoring of all measures in perpetuity.*
 - The Planning Statement (Section 4.175) indicated that the 'Restriction on the Mitigation Land' at the Stansted Estate will be put in place prior to occupation of the first homes. European Protected Species (including Bechstein's bats) will be impacted as soon as the development commences, therefore it must be a legally binding requirement that the Restriction on the Mitigation Land is in place before the development commences.
 - Because the impact on European Protected Species will be immediate it is essential that the mitigation and compensation planting on the Stansted Estate should be in place before the development commences. It will take many years for this new woodland habitat to establish and it is essential that it is required to be planted as soon as possible.
- A detailed Landscape & Ecological Management Plan, which provides more information on the detailed design and delivery of the mitigation, compensation and enhancement habitats. This should include a Woodland Management Plan for adjacent woodland.
- Ecological Clerk of Works to be present when any habitat is cleared and the mitigation / compensation works are undertaken.
- A legally binding agreement such as a Section 106 is signed before development commences to ensure that all of the agreed measures and management have to be delivered in perpetuity.
- A Construction Environment Management Plan covering in detail; ecological protection measures, protection of Ancient Woodland and other SINC habitats, hydrology, motorbike control, traffic and pollution risk management.
- The submission and approval of a detailed lighting strategy for approval before development commences, with implementation of the approved measures signed off by a competent lighting engineer on completion to ensure the impact of lighting on the night time ecology and commuting corridors is minimised. This should include an appropriate zoning strategy as set out in the proposed lighting mitigation measures, to guarantee that dark buffer zone corridors are delivered before the development is occupied.

Figure 1: Bechstein's bat tracking results 2009 north of Long Copse Lane (Based on ECOSA report for P.Water)



Note: The full data is available to the LPA in the ECOSA bat reports submitted with the Portsmouth Water Havant Thicket Reservoir Application. The relevant maps are in the 2013 ECOSA report referenced as Maps F.b.39 to 41 and Maps F.b.45 to 50.