

Att: Mr Adrian Ellis
Planning & Development
Havant Borough Council
Public Services Plaza
Civic Centre Road
Havant PO9 2AX

Objection to: App/21/00893 – Land north of Long Copse Lane.

This application pre-empted the final stage of the Local Plan Inspection. Therefore, Havant Borough Council must delay any consideration of this application until the Inspectors Report is published, or risk undermining local democracy through the public participation in the many stages of this particular consultation.

It is tempting to think this application has been pretty hastily thrown together before the final Inspection outcome is known on the Local Plan, and the likely changes to the Government's Planning Policy.

Because of this haste, contradictions, discrepancies and errors are evident throughout the supporting documentation:

- Tree measurements inaccurately recorded in the Barrell Tree Schedule (appendix 2) are at variance with measurements verified & recorded on the Ancient Tree Inventory data base in 2018-19. (Please see Comparison Table).
- These inaccurate measurements in turn leads to a mis-calculation of the Root Protection Areas required in Forestry Commission Standing Advice regarding veteran tree buffers.
- Barrell Tree Schedule measurements are invariably smaller than those on the ATI, giving rise to smaller RPA radii using Standing Advice for mature trees, not taking into account any Veteran tree verified designations that should give rise to 15+ RPA diameters.

Please see attached table: Sample comparisons of Arb. Assessment measurements with data recorded on Ancient Tree Inventory (ATI)

Despite having previously alerted the applicant to the Ancient Tree Inventory records pertaining to Long Copse Lane, and particularly to the small copse to the east of Old Dairy Lane, there is still no acknowledgement of the special care of these irreplaceable trees.

Veteran trees display characteristics of age and survival such as storm damage, deadwood in the canopy, hollows and fissures. These characteristics together create high biodiversity values and micro-environments. These characteristics in mature and veteran trees make them irreplaceable, and must be protected from all developments.

References: NPPF Paragraph 175C, and Forestry Commission & Nat.Eng Standing Advice at <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

2. Various reassurances are made in the applicant's supporting documents designed to allay fears about lost green features. Unsupported and unmeasurable statements such as the following cannot be believed and are contradicted in the highways drawings, for example, –

“Character of the Lane will not be harmed”

“Seeking to retain the character of the Lane”

“Sensitive widening of LCL in places”

It is quite clear significant areas of small tree growth, hedgerow and understorey vegetation **will** be removed to widen it on the north side, and include infilling the existing ditch that will have a negative impact on associated ecosystems.

The application clearly goes against guidance to protect the biodiversity, cultural and heritage value of veteran trees and ancient woodland.

3 .These trees and bushes may have been relegated to Category C and of low quality, but should be understood and appreciated as scrub edges/scrub woodland (where woodland starts or ends). These areas are extremely valuable habitat on which over 450 rare and threatened species depend, including the impressive assemblage of bat species on County records, but not adequately acknowledged by the applicants.

Scrub has previously received little attention from ecologists but guidance is now available to prioritise it for future conservation, (e.g. JNCC Report No 308: The Nature Conservation Value of Scrub in Britain).

It is very disappointing that the Arb Assessment claims the loss of *'low quality trees, of small size or poor condition'* will not cause negative impacts. To do so avoids acknowledgement of the importance of such trees in ecological and biodiversity terms.

Removal of this growth will:

- a) be detrimental to the woodland character of the Lane, and
- b) destroy habitat providing food sources (nectar, berries, foliage) for a wide variety of creatures as well as shelter, nesting and protected routes between habitats.

4.Tree related information in the transport assessment report conflicts with the Barrell Tree Protection plan. Just four examples this recurring fault are listed here:

Group G54 containing oak, holm oak and sycamore but described as are shown as retained in the Barrell documents, but shown as removed in plans for road widening works

Category A trees T1, T2 and T5 are shown as 'retained' in the Barrell Tree Survey despite clearly within the Highway boundary line shown in drawing 7 of Vol 2 of the Transport Assessment.

T28 and T30, both category A trees to be retained (Barrell), nevertheless will be traumatised by the road widening proposed at the Wraysbury Court Drive junction with the Lane to calm traffic movements there.

The proposed access roads from the Lane into the site will clearly require the removal of further trees and groups (see Transport Assessment Vol 2 sheet 3), but not acknowledged in the Barrell Tree Survey
Glad to see that T 31, and Ts 34-37, plus Groups 104 will be managed by special precautions – this appears to reflect the Veteran status of these trees, though this isn't actually stated.

These trees are merely described as "mature" – this glosses over their actual significance in biodiversity, cultural and heritage terms.

Conclusion

Not only is the application pre-empting the final outcome of the Local Plan inspection but it also

does not demonstrate the “wholly exceptional reasons” required to pursue loss or deterioration of ancient woodland, ancient trees and veteran trees.

Nor does it propose a suitable any compensation strategies for the exceptional assemblage of bats on record associated with the site, neither in terms of habitat, foraging, lighting, or raised incidence of predation and disturbance.

The application is not in a fit state for determination, and consideration must be delayed.

Yours sincerely

SAMPLE COMPARISONS/ ARB. ASSESSMENT MEASUREMENTS AND ANCIENT TREE INVENTORY (ATI)

Barrell Identification (Appendix 2)	Tree No.	Category & Species	Diameter @ 1.5m	RPA radius	Grid reference	ATI tree Identification no.	Diameter on ATI @ 1.5m	RPA in line with Standing Advice Guidance
T3		A. Oak	12.0m	144m	SU7462407844	188409	148cms	Min. 18m
T20		B. Oak	100cms - "several stems, no access to base"	12.0m	SU7462407844	188411 multi-stemmed coppice	119.5 @ 0.25cms, i.e. around stool below coppice	Min. 15m
T29		A. Oak	80cms	9.6m	SU7478307878	188414	119.7cms	Min. 15m
T31		B. Oak	100cms	12.0m	SU7480607874	188475	4.02cms	Min. 12m
T33		B. Oak	90cms	10.8m	SU7484107881	188489	4.17cms	Min. 12.5m
T36		B. Oak	90cms	9.6m	SU7485507883	195308	121.6cms	Min. 12.5m