

Dear Lesley,

APP/21/00683 | Erection of 8No. dwellings together with associated works. | Land adjacent to 54, Long Copse Lane, Emsworth 21.0784

Thank you for consulting me on this application.

The application is accompanied by a Preliminary Ecological Appraisal (WYG, June 2021), a Reptile Survey report (WYG, June 2021) and a Phase 1 Survey and Management Plan (WYG, May 2020).

The site is classified as Land East of 54 Long Copse Lane Site of Interest for Nature Conservation (SINC) and as such its development would be contrary to Policy CS11 of the Havant Borough Core Strategy March 2011. The emerging Local Plan 2036 contains Policy E14 which provides details of how SINCs are expected to be addressed in planning. The expectation is that impacts to SINCs are avoided, but where impacts will occur the benefits of the development must clearly outweigh the impact to biodiversity and the SINC: this is not for me to judge.

I had detailed pre-application correspondence with HBC and the applicant in 2017 for GEN/17/00853. At that time I raised concerns over the loss of SINC grassland and there was some detailed discussion regarding the composition of grassland habitat and the extent to which this confirmed the SINC status. The applicant has undertaken a detailed botanical assessment of the SINC grassland, using a recognised national expert. The conclusion of this assessment is that the application site is indeed of SINC status.

The proposed compensatory area lies immediately east of the application site and comprises a larger area of semi-improved grassland and scrub, elements of which are unimproved and comparable in species-richness to the adjacent SINC. Whilst I am generally supportive of a commitment to a larger, well-managed compensatory area of grassland there are outstanding issues that require attention. Firstly, it is my understanding that the compensatory area was originally set aside as mitigation for the previous Hampshire Farm development site. The site is certainly included within the submitted and approved Landscape Strategy – Public Open Space plan submitted as part of 10/74014/000, although the current WYG Management Plan suggest that it is separate (see sections 3.1, 3.2). This raises the question of double-counting: it would be inappropriate for this proposal to use mitigation land already counted for addressing impacts from a previous development. I suggest that further clarity is provided on this issue before the current proposal is judged acceptable: the loss of a

SINC is inconsistent with Local Plan policy and therefore any mitigation package must deliver measurable compensatory habitat.

Secondly, the compensatory area is already well-used by the public as greenspace (as was its apparent purpose under permission 10/74014/000). To what extent would existing recreational usage hinder (or help) the proposed habitat enhancements and ongoing management? The submitted Management Plan (WYG, May 2020) states that the site '*has no management plan in place*', and yet a condition of 10/74014/000 was that the site was to be managed in accordance with submitted details. I would request further detail on why there is currently an apparent absence of management of this site. The lack of management obviously provides an opportunity for management interventions to enhance biodiversity value, however if any uplift is achieved only because previously-agreed management has not taken place this creates a false impression of enhancement. In other words, it is not acceptable for the current proposal to undertake (and claim the benefits of) management that should have occurred anyway, especially where this entails impacts to a SINC. I am fully supportive of any measures to enhance the botanical value of the site, but double-counting cannot be seen as acceptable. Further information is required.

In terms of the proposed management of the compensatory area, I am generally supportive of proposed turf translocation as a means of retaining SINC-quality grassland. The SINC grassland is certainly species-rich and any measures to negate the loss of this important habitat must be avoided. The close proximity of the receptor site is a beneficial factor and there is every reason to suggest that this technique would be successful. As ever, this is wholly dependent on a commitment to long-term care and management to ensure success: if previously agreed management of the site has already been ignored, this raises concerns over the delivery of new long-term management.

In summary, whilst I do not have a fundamental issue with the proposed management techniques for the compensatory area, its status is currently unclear in respect to the Hampshire Farm development site. Further information is required at this stage.

If you have any queries please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

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