HAVANT BOROUGH COUNCIL
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Grainger response to comments from Sarah Warriss-Simmons on the Land Management Strategy

05/08/2014

Comment No.	Section No.	Sarah Warriss-Simmons comments	Grainger Response
1	1.1	States that for each phased development parcel, an amended version of this Land Management Strategy will be submitted including relevant information regarding the latest phase and how its management integrates with the wider strategy. At the internal meeting on Monday it was discussed how a revision of the full plan was not necessarily required or desired – and that phase specific information/changes could be set out in an appendix to the document, resulting in an appendix for each phase without needing to duplicate the whole document.	We do not envisage that a major rewrite would be necessary with each phase. As most management practices are generic, all that will be needed for each new phase (in most cases) will be new plans showing the expanded area over which the generic practices will apply. Should a new management regime be required for an individual phase then this would simply be included with all the other management descriptions. In all likelihood the management regime in question would be applicable in some future phases and thus would become generic.
2	1.1	States that the key requirement at each phase will be to graphically highlight where relevant generic management practices are to be undertaken. However this hasn't been done for phases 1, 2 or 3, as the codes within this LMS don't match the codes on the landscaping plans submitted for those phases (see further comments below). How will that information be provided?	It is not possible to retrospectively amend the codes for the Phases that have already been submitted for planning, i.e. Phases 1 and 2. However we will amend Phase 3 accordingly, so that it is in line with the Land Management Strategy. The landscape management plans for phase 1 and 2 accord with the principles set out within the land management strategy. The approved works for both of these phases are also subject to approved landscape drawings and management plans. As such, there are appropriate mechanisms in place to ensure that they will be correctly planted and appropriately managed in accordance with the principles set out within the Landscape Management Strategy.
3	1.1	States that in 2010 BbD produced a document covering the principles of both restoration of the River Wallington and design and management of both this and the Sustainable Drainage Systems of the Berewood Site. Clarification is sought as to whether this LMS should supersede that document, or whether the intention is that the document will still stand and the information not be duplicated within the LMS. Should any such documents which are intended to still stand form part of the appendices to the LMS (otherwise we are still in the position where different specs are spread across different documents)?	The River Wallington Landscape and Biodiversity Strategy (and accompanying plans) still stands in setting out the broad landscape and habitat creation principles which will be implemented during the river restoration and the creation of the adjoining nature reserve. These principles will be incorporated into relevant development phases as the project moves forward and into updates of the management plan. It is not necessary at this early stage to integrate all these principles in the LMS in advance of reaching the relevant phases. The LMS is intended to be a living document and as such all previously approved documents will be considered in relation to the appropriate phase at that time, and be referenced in any addition that is made to the LMS. It is therefore not necessary for previously approved documents to be appended to the LMS. All previously submitted Landscape Management and Maintenance documents, i.e. for Phase 1 and 2, are standalone documents which will not be amended. Phase 7 has been submitted for planning also and the document itself will remain unchanged. However Phase 7 is yet to be detailed, and once it is, the management regimes will be detailed in the Associated Plans which will be appended to the updated LMS.

Comment No.	Section No.	Sarah Warriss-Simmons comments	Grainger Response
4	1.1	Similarly, states that a Landscape Maintenance and Management Plan was produced by Fabrik in May 2013 relating to the Phase 7 River Wallington Nature Reserve, and in May 2013 relating to the Phase 2 Infrastructure. As above, are these documents superseded by the LMS or should they form appendices to it?	This document has not been written in retrospect. Therefore any previously approved Landscape Maintenance and Management Plans remain relevant and are not superseded by this document. However the principles are incorporated into the LMS. All management plans for individual phases will in time be integrated into the main document – these are the Associated Plans updated when necessary, and included in the Addendum of the Land Management Strategy. There will be a cross over period during the implementation of those documents approved prior to the LMS. It is therefore considered necessary for both documents to be considered whilst the works are being carried out. Going forward, only the LMS will be submitted for approval and relevant to the implementation works.
5	1.1	It is also mentioned that the Newlands Farm Meadow Restoration Strategy has been produced by BbD in December 2013 in keeping with ES commitments. It is stated that its key recommendations need to be incorporated and a set of site-specific prescriptions provided for the wildflower meadow management long term in keeping with the document. Clarification is therefore sought as to when and how the key recommendations are to be incorporated into the LMS, as the LMS does not currently cover the Newlands Meadow in any detail.	It was agreed at the meeting on the 11th March that the management plan would not deal with habitat creation prescriptions but instead focus on management. At this moment we are still in the process of restoring the meadow. Once it is restored we will commence management, probably in 2016. We need to see how the meadow is establishing in 2016 before prescribing a fixed management regime. Any management strategy prepared now could be redundant by 2016. Therefore, at this time, the documents approved in December 2013 remain the relevant documents when considering the restoration of Newlands Meadow. The production of a long term management plan for Newlands Meadow will be triggered by the completion of the restoration works and appended to the LMS as appropriate. This will be issued to the Council for consideration/approval at that time. As a general comment and as previously discussed we are not producing detailed site specific management strategies well in advance of new habitats being created.
6	1.2	Sets out the requirements of the S106. 19.26.5 of the S106 requires the LMS to identify the administrative structure and funding for implementation of the LMS. Section 1.3 sets out the long term management responsibilities. It is stated that Prior to submission for each phased development area, there will be negotiations with the listed organisations to ensure a cohesive management approach, and that where relevant this will be set out within the Phased Area Strategy. However it also states that Prior to the first occupation of each phased development area there will be negotiations with the listed organisations to ensure a cohesive management approach. As such, currently the LMS doesn't appear to set out the administrative structure or funding for its implementation. It is also unclear as to at what stage this information will be provided. For Phases 1, 2, and 3 presumably these discussions will already have occurred and therefore the information will need to be provided for these phases at this stage.	The administrative structure for funding the implementation of the LMS has been discussed in detail at a couple of the Implementation meetings. Whilst Grainger are committed to ensuring an appropriate administrative structure (and funding) is in place for the landscape management, it is too early in the development process to be able to provide exact information on how this structure will work in practice. Indeed, at a recent Implementation meeting both Winchester and Havant Council's agreed that they were not yet clear on which element of the works they would be responsible for, whether they are to adopt the parks and therefore take on management, and how the responsibility will be apportioned between authorities (it was mentioned that Winchester may take on a some of the management and maintenance works within Havant Borough). It was therefore agreed that because these issues are likely to take some time to resolve, and that further discussions between Winchester, Havant and Grainger are needed on this matter the LMS would set out the intended administrative structure with the specifics to be confirmed at a later date. Where and when necessary the LMS will be updated to reflect the agreed structure.
7	Figure 1.3	Figure 1.3 still shows the ponds within Newlands Farm Meadow as	The figure has been amended.

Comment No.	Section No.	Sarah Warriss-Simmons comments	Grainger Response
		being SuDS ponds, though it was confirmed previously by Lincoln that they are not. It also seems to show the main existing GCN breeding pond as a SuDS pond. Clarification is sought. Overall the SuDS shown on Figure 1.3 don't correspond with the SuDS shown on the SuDS plan Figure 3.3.	
8	Figure 3.2	Figure 3.2 hasn't displayed properly within the LMS and therefore is misleading in its content. (The full size plan at the end of the document may be displaying properly but I'm unable to confirm this as I don't yet have copies of these plans).	This is shown on second half of the document which features the figures.
9	5.1.1	States that works required are illustrated in the tables that are included within the detailed Landscape Maintenance and Management Plan relevant to each phased development, and relate to the defects liability phase of the external works contract. We discussed previously that we were trying to avoid a separate Landscape Maintenance and Management Plan for each different phase as we will end up with many different plans. However, is it the intention that a Landscape Maintenance and Management Plan will be submitted for each phase of development, for the implementation and establishment of new planting/seeding, and that the measures within the LMS will only apply once the habitat is established? Clarification is sought on this, along with timescales and what stage the LMS will apply. The relationship between the LMS and any/all LMMPs needs to be set out. [As an aside, was a LMMP therefore submitted with the Phase 3 Infrastructure application?]	This text has been amended to avoid confusion. To clarify, it is not the intention for a Landscape Maintenance and Management Plan to be submitted for each phase of development. Yes, the management covers the implementation and establishment of new planting/seeding. The measures within the LMS will apply during habitat establishment and beyond.
10	5.1.1	Refers to years 1 – 20, however elsewhere in the document years aren't specifically referred to. When is year 1 for a particular phase?	We have amended the text to say 10 years. Year 1 relates to when the phase is completed. This would determine the end of the defects period and the start of the landscape management company agreement.
11	5	Management regimes – we discussed how protected species requirements would be incorporated into these management specifications, e.g. for nesting birds, dormice, great crested newts, reptiles, badgers, however such requirements don't seem to be consistently included within all of the relevant management prescriptions.	We have included the following text to ensure all tree work and hedgerow management is consistent with the following principles: • *Cutting and pruning of trees and shrubs will, whenever possible, be undertaken in mid-winter thereby avoiding nesting birds and Dormice (Dormice may be present in any of the Site's woodlands and also hedgerows west and south of the central/southern wooded area), and fruiting/flowering shrubs.* • *Where the bird breeding season (March to August inclusive) cannot be avoided the contractor will ensure that prior survey for nesting birds (and Dormouse nests for woodland areas and hedgerows on the western and southern sides of the Site) has been undertaken by suitably qualified staff.*

Comment No.	Section No.	Sarah Warriss-Simmons comments	Grainger Response
			• *Where an active nest is identified the contractor is to ensure that pruning does not lead to its damage and that disturbance is minimised e.g. a 5m zone either side is left uncut. The contractor is to return to cut any excluded section after chicks have fledged.* • *Where tree works are required for reasons of health and safety, relevant trees will firstly be inspected by an ecologist, in particular checking their potential to support roosting bats; where necessary a Method Statement is to be produced and tree works supervised by an ecologist (under a licence where necessary).* • *The minimum amount of arboricultural work is to be carried out to make each tree safe, i.e. crown reduction and pollarding is to be stipulated.* • *Should there be a need to clear a patch of woodland or a hedgerow section, advice should first be sought from the Project Ecologist to assess risk to Dormice. Where necessary a Method Statement is to be produced and works supervised by an ecologist, potentially under a Natural England licence.* For Ponds and SuDS features, the following applies: • *Emergent vegetation cover in mid-summer is to be maintained at between 25-50% every year.* • *Submerged vegetation cover in mid-summer is to be maintained at between 50-75% every year.* • *All cut vegetation is initially to be left at the pond-side to allow fauna to escape back to the pond. Within two days the cut vegetation is then to be removed and placed in an appropriate composting location where products of its decay cannot filter back into the pond and encourage eutrophication.* • *If dredging is considered to be required by the project ecologist, no more than $1m^3$ of silt is to be removed for every $100m^2$ of pond area (SEPA 2000).* • *Dredging is to be undertaken in mid-winter when amphibians, including Great Crested Newts, are usually absent (N.B. Great Crested Newts may be present in all ponds on the western half of Berewood and may in time colonise ponds (including SuDS ponds) on the eastern side).* • *A detailed strategy for the restoration of Plant Farm Pond is to be prepared and effectively implemented at the appropriate phase of the development.*
12	5.2	Do the measures set out within the 'programme' column apply only to woodlands not specifically listed later in the table? For example, the generic measure to formulate a 6 – 10 year programme for coppicing/thinning conflicts with specific measures relating to specific woodlands shown later in the table. As is, for example, the generic measure to loosen soil around coppice stools and mulch with woodchip, which doesn't sound very good for dormice or ancient woodland groundflora. It is therefore unclear for which woodlands which measures at different parts of the table apply. Similarly the generic measure to sow coppiced areas with woodland	Regarding sowing of woodland ground flora we state that we would only do this in *'coppiced areas with impoverished ground flora'* and in Alsfordmoor Coppice which has been in large part degraded through Larch planting and other disturbance. In these areas Bramble and Common Nettle are dominant. Clearly we would not sow where noteworthy ground flora already exists. The precise locations for sowing are to be identified in due course once a management company and funding has been agreed. Prescriptions have now been separated from programmes for clarity. Future phases will be designed in detail therefore the Associated Plans will be added when the LMS is revisited with each phased submission.

Comment No.	Section No.	Sarah Warriss-Simmons comments	Grainger Response
		ground flora in the following year may not be suitable for existing ancient woodlands.	
13	Section 5.2ii of table	Refers to site specific one-off woodland management actions (NB detailed programmes to be agreed over the next 6 months). Clarification is sought regarding what this means and when the measures will be programmed, including in the context of point 10 above. Presumably all the management of existing habitats needs to commence prior to phase 2 works commencing?	We will remove reference to 'Site-specific one-off woodland management' which we agree is an unclear statement. It was agreed with the local authorities that a clear programme cannot be set out until an agreement has been reached over management adoption, funding, etc. With respect to Phase 2 woodland planting has already commenced and more is planned for winter 2014/15. Some woodland management has also commenced – 'dead' hedging and log piles have been created in Marrelsmoor Coppice. Roost features for bats have also been created in Marrelsmoor Coppice. We can provide photographic evidence if required. Dead hedging was also installed previous to Phase 2 to the west of Marrelsmoor Row.
14	5.211	Most of the programme column is empty so the timing constraints are not clear. Some entries in the programme column don't correspond with what the text states. E.g. regarding plant row it is stated that coppicing is to be undertaken between December and February. However in the programme column it states that coppicing will be carried out October to March.	We have added prescriptions and amended where necessary.
15	Section 5.2ii of table	I would raise concern about sowing of ground flora in existing ancient woodland areas (this theme is repeated at several places in the table) with potential to introduce less desirable or less naturally suited species. Consideration should be given to the potential for sourcing such seed from within the existing sites.	Regarding sowing woodland ground flora, we state that we would only do this in 'coppiced areas with impoverished ground flora' and in Alsfordmoor Coppice which has been in large part degraded through Larch planting and other disturbance. We also state that the seed source should be 'appropriate', i.e. of local provenance and relevant to the woodland. Note that some of the wooded areas in particular parts of Alsfordmoor Coppice are quite degraded (dominated by Bramble and Common Nettle) and giving these areas a helping hand is no bad thing. We are not of course suggesting doing this where notable ground flora is well established. We should amend this slightly and in each case state: *In coppiced areas with impoverished ground flora an appropriate (local provenance) native woodland ground flora seed mix is to be sown in the following year and supplemented with plug planting of those species that establish poorly from seed. Consideration should be given to the potential for sourcing such seed from within the existing sites.*
16	Section 5.2ii of the table	The treatment of desire lines is included with regards to Plant Row, but not in relation to the other woodlands. Can this be clarified?	We are happy for this practice to be added to other woodlands although it is much more of an issue with respect to Plant Row as it is very narrow and thus very vulnerable to fragmentation and disturbance.

Comment No.	Section No.	Sarah Warriss-Simmons comments	Grainger Response
17	Section 5.2ii of the table	A later part of this section of the table describes woodland paths and access. Clarification is sought as to which woodlands this applies to, in particular the construction of wide gravelled paths on existing rights of way and selected desire lines. Where are the proposed 'entrance(s) to woodland' where it is intended to install signage? The ES refers to 'establishment of robust pathways in select locations'.	At subsequent phases, we will liaise with arboriculturalists and ecologists to ensure suitable routes and materials area used. These will be shown on updated Associated Plans that will be submitted with future phases.
18	Section 5.2ii of the table	Should refer to 'trees are firstly to be inspected by an ecologist, in particular checking their potential to support roosting bats; where necessary a method statement is to be produced and tree works supervised by an ecologist under a *licence where necessary*.	Noted, amended as requested.
19	Section 5.3 of the table	Does this specifically refer to trees outside of woodland?	Yes
20	5.3 of the table	Avoiding/minimising risk to wildlife section refers to buffer of 3 m to nesting birds in one place and buffer or 5 m to nesting birds in another.	We will ensure this is consistent and change the reference to '3m' to '5m'.
21	Section 5.3 of the table onwards	What do the codes within the programme column actually refer to and where is this set out (are they necessary?).	The codes refer to the management matrix – we have amended the codes so that they are in accordance.
22	Section 5.4 of the table	Hedgerow general – does this encompass buffer planting including buffer planting where the outside plants are to be enabled to form a hedge?	No, the buffer planting should not be treated as a hedgerow. The buffer planting is intended to form part of the woodland. The species palette includes lots of dense shrubby species which is intended require little management, provide good habitat for Dormice and nesting birds, inhibit growth of desire lines. We have not set out bespoke management for these new woodland areas although site specific measures can be considered in time once the new woodland has established.
23	Section 5.4 of the table –	Existing hedging – does this refer only to existing hedgerows as on the site at the current time? Through the life of the plan all new hedgerows will eventually establish and become 'existing hedgerows' therefore how is the distinction made between existing and other hedgerows?	The management plan will be updated in time when this becomes relevant. It's a living document and thus can be updated when appropriate.
24	Section 5.4 of the table	Maintenance of hedge bases – this is not suitable for all hedges, to which hedges does it apply?	Refer to the last bullet point of Section 5.4.
25	Section 5.4 of the table	Existing hedgerows – this is an apparent duplication?	This duplication has been omitted now.
26	Section 5.5 of the table	Native shrub planting – does this encompass buffer planting (see point 22)? This may have separate requirements. The timing within the programme column conflicts with the text and wildlife interests.	This doesn't include buffer planting which should be considered under the woodland prescriptions.
27	Section 5.6ii	Grass cutting standards – Regimes A, B and C are set out for general	We feel grassland types are already clearly distinguished.

Comment No.	Section No.	Sarah Warriss-Simmons comments	Grainger Response
	of the table	amenity grass, wildflower meadow grass and swale/meadow grassland and species rich flowering grassland. The distinction between the types is not clear, including how they are defined on the plans. The specifications don't appear to take protected species into account – e.g. reptiles, GCN etc. The ES refers to cut and removal of arisings once or twice annually for wildflower grasslands, along with creation and management of zones of tussocky less frequently managed grassland (on three year rotation). This isn't reflected in the regimes. I am concerned that areas subject to just one late cut every year will become rank with coarse grasses 'road verge' type habitats. Additional cuts including early cuts will help replicate grazing. If the LMS supersedes the Newlands Meadow plan, where are the detailed specifications for Newlands Meadow set out? Is there not opportunity in some areas on site to leave clippings in compost piles suitable for use by reptiles?	Regarding protected species such as reptiles and GCNs, they will be expected to adapt to the local conditions. A detailed mitigation strategy is not required in relation to routine grassland management. We've discussed this with NE and they are in agreement. Note that there will be a significant increase in a wildflower grassland across the Berewood Site compared to the status quo (the land is mostly arable with some intensively grazed pasture) which will benefit GCNs and reptiles. For established summer-flowering meadows only one cut is usually required in late August or September. Sometimes 3-4 cuts may be required in the very first year to encourage perennial flowers and grasses to develop strong healthy roost systems. Please note that management regimes can however be adjusted depending on the results of monitoring. The LMS should be seen as living document. You are quite right to state that the ES states cutting '**once or** twice annually'. Regarding Newlands Meadow as discussed above management will not commence until sometime in 2016. We intend to wait until then (and assess the success of the restoration strategy) before we come up with detailed grassland management prescriptions. We have included text stating that clippings are to be deposited in compost piles to create suitable for use by reptiles.
28	Section 5.6v of the table	Refers to 'used to the banks' – unclear what this means.	Text amended.
29	Section 5.11 of the table	Refers to yearly inspection reports to be submitted to the Estate Management Company. Clarification is required as to what the yearly inspection reports are (and what else they will cover) and also what the estate management company is.	Independent auditor to ensure Landscape management companies are carrying out works according to LMS. They will produce an annual report which aims to provide comfort to the long term management responsibilities.
30	Section 5.11 of the table	None of the measures have timings in the programme column.	We have added prescriptions and amended where necessary.
31	Section 5.11 of the table	Are reptile and amphibian refugia being proposed?	Yes, we state in the objectives *'To establish, nurture to maturity and maintain in the long-term new artificial refuges for wildlife'* which should include refuges for reptiles and amphibians. We will clarify. In Section 5.11, we state that five artificial GCN/reptile refuges will be created in each Community Nature Reserve; locally cut woody material will be used wherever possible.
32	Section 5.11 of the table –	Refers to the management proposals for the dormouse skywalk to be formulated at a later date. Why is the dormouse skywalk specifically mentioned when features such as badger tunnels and	Yes, this appears inconsistent but the local authority (Jill Lee) specifically asked about the Dormouse skywalk in the meeting on the 11th March and so we made reference to it in the document to provide reassurance that it had not been forgotten. This element of the project is, however, some way off and

Comment No.	Section No.	Sarah Warriss-Simmons comments	Grainger Response
		gcn tunnels are not described at this stage?	so no detail is provided. Regarding the installation of Badger and GCN tunnels, these measures are mitigation rather than management. At the meeting on the 11th March we were told not to include mitigation in the plan. In terms of maintenance of any tunnels this will be discussed when the relevant phases come forward.
33	Section 5.12 of the table	This doesn't appear to differentiate between SuDS ponds and existing/new wildlife ponds, which should presumably be managed differently – the wildlife ponds principally for wildlife and the SuDS ponds presumably needing to be managed in a certain way to maintain their function as SuDS?	The same broad principles apply from an ecological perspective. If at a later date site specific management is required the plan can be amended accordingly. Let's see how the new habitat establish before we try and be too prescriptive. At this stage the SuDS Strategy has provided an overview of proposed SuDS elements. However, at the detailed stages, all SuDS ponds will have their own ecological benefits to biodiversity and wildlife habitats.
34	Section 5.12 of the table	Where is the management of the River Wallington itself set out?	The management of the River Wallington and the adjoining Community Nature Reserve is to be set out in future phases. We do not think we should be too prescriptive with respect to management prior to particular habitats being created and establishing. When these areas are detailed in design, Associated Plans will be added to the updated LMS.
35	Section 6.0 the table	When will the monitoring described here commence? Where will the information collected go and how will any detailed management regimes developed come forward?	This depends on when an agreement is reached in terms of a management body, funding, administration. This needs to be agreed with local authorities.
36	Section 6.1 table 1	Does this matrix take into account management regimes relevant to a phase but associated with areas outside of that phase (i.e. not within the actual phase footprint)? It doesn't appear necessarily to be accurate – e.g. Newlands meadow comes forward with phase 2 and should involve tussocky meadow, wetland habitat, ponds, native shrub planting etc, none of which are reflected on the matrix.	When management will commence will be set out once an agreement is reached in terms of greenspace adoption, management bodies, funding etc.
37		Section 6.1 table 1 [NB both tables, though different, are called table 1] – This refers to a full description of each management regime being presented in table 3, however there isn't a table 3. The coded habitats shown on this second table 1 are not all covered within the management regime table of the LMS, and the codes in the table do not correspond with either the codes used on landscaping plans or the remainder of the document. For example elsewhere in the document shrub maintenance (SB), hedge maintenance (HM), tree management (TM) and ornamental shrub maintenance (SBA) are referred to yet these codes don't appear in the table. The codes need to correspond with the codes used on landscaping plans, otherwise there is not necessarily a way of knowing which regimes apply to which habitats on site.	The table numbers have been amended and the codes have been co-ordinated throughout the document so that they align with the matrix.