

APP/14/00360 | Outline application for the construction of 53 dwellings with new vehicular access from Coldharbour Farm Way with all other matters reserved | Coldharbour Farm - Phase 2, Coldharbour Farm Road, Emsworth |14.0510

Thank you for consulting me on this application. In summary, I consider that further ecological information is required prior to determination.

The application is accompanied by an 'Extended Phase 1 Habitat Survey and Bird Habitat Suitability Assessment' report (Ecosulis, August 2013) which provides a description of the site and its ecological features. Overall, I consider that there are significant limitations to this report and that it does not provide a satisfactory assessment of the ecological value of the application site. The report is light on detail and does not provide a robust assessment of the range of ecological constraints at this site.

The report states that a total of nine plant species were recorded. I find this total entirely unrealistic and consider that plant species have been significantly under recorded. For instance, the application's own Landscape and Ecological Design Strategy and Outline Plant Specification report (Lizard Landscape Design, February 2014) lists (Section 2.0, page 1) a total of 17 tree and shrub species, nearly twice the number of plants recorded across the entire site by the ecological survey. In addition, the application site has been subject to detailed botanical survey by the Hampshire Biodiversity Information Centre (HBIC) in 2001 (48 grassland species alone noted) and 2010 (46 grassland species noted). These surveys, whilst concluding that both fields were of limited botanical interest, nevertheless recorded dozens of plant species within the grassland habitats alone, including several indicative of old meadows. I am therefore certain that this site supports more than nine plant species.

The ecological report does not include a detailed desk-based assessment. A desk-based assessment is a standard component of any basic ecological survey (indeed it is stipulated within the survey and reporting guidance published by The Chartered Institute of Ecology and Environmental Management (CIEEM)) and should incorporate a consultation with the local Biological Records Centre, in this case HBIC. No such consultation has been made and consequently the report has no data to present or discuss. I should also like to note that the use of National Biodiversity Network (NBN) gateway data on their own is not acceptable. NBN data are not available for commercial use unless with express permission from the NBN and, even then, the data are seldom at a resolution appropriate to make site-scale assessments for planning. In line with NPPF, CIEEM guidance and the British Standard BS 42020:2013, consultants should be utilising the most up-to-date sources of biological information available – such as from the local Biological Records Centre.

The application site is immediately adjacent to the 'Stream West of Emsworth Recreation Ground' Site of Importance for Nature Conservation (SINC), noted for the presence of a scarce aquatic plant (narrow-leaved water plantain) as

well as being a habitat rich in other aquatic plant species. No attempt has been made to investigate this SINC – given its proximity to the development site I would suggest that impacts (direct or indirect) are possible and therefore sufficient detail should be provided. No attempt has been made to access the SINC report from HBIC – this provides a detailed assessment of the botanical interest of the SINC and would be essential to any meaningful ecological survey of the application site. To say that access was not possible due to dense scrub is countered by the fact that HBIC were able to gain full access to the SINC to conduct their survey.

The report is overall extremely light on any meaningful assessment for protected species: it concludes that there are essentially no issues and that no further survey works are required (besides badger surveys when vegetation has died back). I disagree entirely with this assessment and consider that further survey works are a prerequisite to any further consideration of the application. For instance, the adjacent SINC appears suitable for supporting water vole and consultation with HBIC would have revealed the presence of this species locally; the site is in the open countryside and thus highly likely to support foraging and commuting bats – again, no surveys are recommended despite the loss of a hedgerow on site and copious evidence of bat species recorded locally. These examples alone illustrate the sparse nature of the assessment for all protected species – I would expect much more detail to be given and for stronger justification to be made for instances where no surveys are considered necessary. There is no robust detail on potential impacts (e.g. bats and lighting, proximity of development to hedgerows and SINC) arising from this proposal.

The issue of overwintering birds is not dealt with satisfactorily and I would question whether a 'Bird Habitat Suitability Assessment' has been undertaken at all. The site is correctly stated as being within 2km of Chichester & Langstone Harbours Special Protection Area (SPA) and yet the ecology report does not address the key issue in relation to the SPA: that of recreational impacts arising from an increase in residential dwellings within 5.6km. It is the opinion of Natural England that any residential development within 5.6km of the SPA will (either alone or in combination with other sites in the Borough) result in a 'likely significant effect' on the SPA. It is not unreasonable to assume that a proportion of residents from this application site will travel to other sites to recreate, especially coastal sites. Dog walking is one example of an activity for which people will travel some distance and the coast is a significant draw. This proposal has, either alone, or in combination with others, potential to result in likely significant effect, and therefore mitigation measures are required. The recently-published SDMP Phase III contains a range of options for appropriate mitigation measures. I understand that Havant Borough Council, in common with other coastal authorities, now has (or soon will have) in place standard mitigation framework to which developers can contribute financially rather than, as at present, be required to provide often complex site-specific mitigation. I would expect this application to provide further details on this matter.

A second issue not dealt with is the status of sites surveyed as part of the Solent Waders & Brent Goose Strategy (SWBGS). This application site is listed as Site H16H in the 2010 SWBGS and is classified as of 'uncertain' status. Many potentially-important sites for overwintering birds are classified as 'uncertain' within the 2010 strategy, leading to a misunderstanding of these sites' values. The 'uncertain' category reflects the fact that either too few surveys were undertaken or that surveys were not spread appropriately through the recognised survey season: it is perfectly possible for a site supporting large numbers of birds (and thus clearly of importance) on one or a few occasions to be placed in the 'uncertain' category or for a site not used at all to be 'uncertain' as too few surveys were undertaken. Uncertain sites are detailed explicitly within Policy DM23 of the Draft Havant Borough Local Plan (Allocations) December 2012, which states that *"where sites are identified as having an uncertain value within and as defined by the Solent Waders and Brent Goose Strategy (2010), studies will be required to be undertaken in accordance with an appropriate survey methodology in order to determine their level of importance"*. At present, Natural England will expect a minimum of two years' survey data for any development site classified as 'uncertain'. Any assessment for overwintering birds should take account of the potential for the application site and adjacent fields to support waders and wildfowl and whether there would be a resultant loss of habitat or disturbance to birds.

In summary, the ecological information submitted with this application is not of sufficient standard to allow the LPA to have confidence that the ecological constraints are understood and thus can be effectively mitigated. There are essentially no detailed mitigation measures besides generic statements, and these in turn are not explicitly linked to any actual design proposals. I consider that additional survey works are required prior to determination of this application.

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

Kind regards,

Tristan

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Please note that this advice is given in accordance with the Service Level Agreement that has been signed between Hampshire County Council and your Council. These comments are expressed as a professional view provided to Havant Borough Council and should not, therefore, be interpreted as those of Hampshire County Council.