



The countryside charity
Hampshire

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Working locally and nationally for a beautiful
and living countryside

6th December 2019

FAO: Lesley Wells, Havant Borough Council

App/19/00768 – Land at Horndean Road, Emsworth

Dear Lesley,

Please find attached comments from CPRE Hampshire regarding the application at Horndean Road, Emsworth to which we OBJECT.

A. Current Core Strategy Policies

HBC must determine against this application on the basis of its current adopted local plan (Policies CS11, and sub-policies CS11.2 and CS11.7)

CS11.2 seeks to protect and where possible enhance the Borough's biological interest.

CS11.7 seeks to protect wildlife habitats and wildlife corridors to prevent fragmentation.

CPRE Hampshire believes the site being a SINC has significant ecological value of this SINC site, and an important location within the local ecological network. Development will result in a loss of biodiversity and harm to wildlife habitat and wildlife corridors.

B. Emerging Policies

Although the Core Strategy is to be replaced by a new Local Plan, there is some way to go before the Local Plan 2036 is adopted, and so limited weight can be given to it in decision-making processes.

It must be noted however that the pre-submission Local Plan includes similar policies to protect biodiversity and the connectivity of habitats:

Policy E14 expects all development to protect, conserve and enhance the Borough's local ecological network (judged by criteria a-d) and also has specific reference to development to development affecting SINC's, permitted only if either criteria j or k were met. Neither are possible in this case.

C. National Policies

a) The Government published its Environment Bill in October 2019. This re-affirms the commitment to address the continuing loss of biodiversity, and support for developing the connectivity of habitat and local ecological networks, (*Nature Recovery Networks*)

b) NPPF

Green Infrastructure



Para 00 - section 40 of the Natural Environment & Rural Communities Act (2006) places a duty on all public authorities *'to ensure biodiversity considerations are embedded in policy and decision-making.*

Para 011 - a duty to identify and manage local ecological networks *"to help biodiversity adapt to climate change"*

Para 012 - emphasizes that *"local ecological networks can make a significant contribution to developing the Nature Recovery Network... with policies identifying appropriate levels of protection and opportunities to create, restore or enhance habitats or improve connectivity."*

2. Site Specific Briefing and Current Biodiversity Evidence, as at December 2019

N.B. A decision on any application should be based on the information available at that time, and **not** solely on the information submitted with the application.

A. Quality of the habitat

Known as 'Field west of Horndean Road', Site of Importance for Nature Conservation (SINC) HV0117, centered at SU7445 0668.

Awarded local designation in 2011 on the presence of semi-improved lowland meadow, (note this is a UK BAP Priority Habitat).

It is typical of species-rich grassland, and contains 4 old meadow indicator plants.

Also recognized as habitat vulnerable to fragmentation and isolation. It is also vulnerable to changes in climate, and agricultural/economic shifts, particularly under-management.

This field has been neglected by the landowners, but is capable of recovery. Guidance on maintenance and restoration of species-rich, semi-natural grassland is available from Natural England.

Source: publications.naturalengland.org.uk/file/4632387250028544

B. Hants Biodiversity Information Centre (HBIC)

HBIC is responsible for the production of a detailed Ecological Network Map for Hampshire as part of a more targeted landscape-scale approach to conserving biodiversity in Hampshire.

HBIC are also responsible for day-to-day management of Havant Borough Council's SINC's.

At HBC's request, HBIC undertook a survey of the Horndean field SINC in the summer of 2019: This survey identified that most of the hedgerows surrounding the field also qualify as Priority Habitat. And that there is still SINC quality interest remaining, i.e. there are **no** grounds to deselect the field's SINC status.

C. Hampshire Bat Group



Results of the data search of the Hants Bat Group database as at 2nd December 2019 with reference to App/19/00768. Nik Knight, Country Bat Recorder prepared a 2km search covering the area from SU 724 046 to SU 765 087, centered at SU7445 0668.

Overall results: 1,392 records dating from 1996 to 2019, comprising records of at least 14 species, including alcathoe, Bechstein's, Brandt's, Daubenton's, Natterer's whiskered, western barbastelle, brown long-eared, common pipistrelle, soprano pipistrelle, Nauthusius' pipistrelle, serotine, noctule and Leisler's bats. *(Please note that a small part of this search lies in Sussex and thus outside the scope of this database).*

This is an exceptionally high number of records, and the presence of 14 out of the UK's 17 breeding species shows that this area retains the relics of an extraordinarily rich diversity.

All these bat species depend on undisturbed foraging and roosting opportunities, including connectivity between areas they can use. They are, thus, very vulnerable to development pressures, including artificial illumination.

Hampshire Bat Group records are passed to HBIC for synchronization in late December each year. The process of up-loading each year's records can be slow, and most up-to-date information to inform any ecological assessment can be sought from the County Bat Recorder.

D. Ancient Tree Forum

Summary of tree survey, September 2019.

Limited to western boundary of the field only – (permission and access from residents' gardens)

Notable:	Oak	ID 195519
	Oak	ID 195516
	Oak (Sessile)	ID 198108

Veteran:	English Elm	ID 195928
	Oak	ID 195923
	Hawthorn	ID 195934
	Oak	ID 195912

Verified details are available on the Ancient Tree Inventory: <https://ati.woodlandtrust.org.uk>



N.B. Veteran trees are a material planning consideration. Standing advice requires a No-Dig buffer around an ancient or veteran trees of at least 15 times the trunk diameter, and that the buffer zone should contribute to the wider ecological networks.

Although many of the trees on the boundaries are TPOd, it is highly likely new homeowners will apply for major surgery of all trees on the site boundaries, but especially Veteran Tree 1 and Trees 2-6 (shading Plots 2-7), and Veteran Tree 8, (shading plots 7,8 & 9)

3. Quality of the Applicant's Ecological Assessment as at July 2019

In March 2018, Metis Homes commissioned Ecology Solutions to undertake an Ecological Assessment to accompany their proposals on the Horndean SINC site.

Unfortunately, this assessment is very flawed: for a start the Introductory section 1.1.1, misidentifies the site, where it is stated that it lies east of Horndean Road.

At paras **4.3.12** and **4.3.13** there is no mention of the search area involved.

During the course of a very limited period of emergence surveys, the ecologists recorded a very rare Annex 2 species, (western barbastelle), but failed to pass a report to HBIC. The report merely includes a brief listing of 11 species without comment on the exceptional nature of bat fauna in this area.

Paras 4.3.3 attempts to suggest that due to the small extent of the site, and the presence of similar habitats in the local area that this site is unlikely to constitute a significant resource - (this demonstrates a lack of awareness of on-going development at The Haven site (immediately to the north) and in the longer-term Southleigh Farm land (immediately to the north & east)).

The cumulative impacts of development on the landscape need careful consideration, including locally designated landscapes, when policies should identify their special characteristics. The Ecological Assessment glosses over the significance of the north-south Westbrook stream (SINC HV014), its value of being within the meadow for connectivity and foraging corridors alongside mature oaks and roosting opportunities)

Para **4.3.2** gives no evidence of roosting bats, despite obvious visual evidence of very suitable areas in the line of mature trees.

Par **4.3.6** claims an erroneous "*modest level of bat activity*", and "*only low levels of registrations*". Experienced ecologists would ask whether shortcuts were taken:



- Why was only one bat survey was undertaken?
- Why was the transect walked immediately after the emergence survey?
- Why were adjacent fields not surveyed?
- How much were the authors of the report dependent on desk study data from HBIC, rather than on up-to-date fieldwork?

Section 3.5 mentions that Meadow Barley, *Hordeum secalinum*, an old meadow indicator, was recorded. The report does not mention the presence of other old meadow indicators previously recorded and capable of re-emergence with the reversal of a period of neglect.

Table 5, section 4.6 omits recording the time of day the mats were checked for reptiles (i.e. absence due to foraging is likely late morning/afternoon),

Para 7.6 notes without question that the ecological value of the SINC has been neglected, and that the developer proposes mitigation measures. However, there are three unavoidable arguments why development and mitigation is unsatisfactory, and contrary to Pre-submission HBLP, policy 14, criteria j and k):

Most of the meadow will be under concrete, tarmac, bricks and mortar, with many domestic gardens hard landscaped.

This will directly impact the Priority Habitat hedgerows, and the water quality of the Westbrook stream, which feeds into Chichester Harbour and will be subject to diffuse pollution run off from the site. This clearly has a potential impact on nitrate neutrality. What is set aside as '*Public Open Space*' is clearly intended as a recreation area since it is shown with a mown pathway. This is not conducive to meadow plant growth or to the wellbeing of insects and other wildlife (such as deer) currently accessing the SINC.

N.B. The content of the accompanying Ecology RHA report is very largely irrelevant to this site and application.

4. Conflict with KP5, Southleigh in the Local Plan 2036

The windfall provision of 16 units through the piecemeal development of the Horndean Road meadow SINC is in conflict with major site KP5, Southleigh, allocated in the Local Plan 2036.

Southleigh is capable of delivering c. 2,100 homes, and given its scale a Framework Masterplan was informed through extensive community consultation which CPRE Hampshire attended. A significant and comprehensive ecological mitigation strategy was proposed and agreed in exchange for the development having a central bias towards Denvilles, rather than towards the Horndean Road and Emsworth. This was deemed preferable as it allowed a more substantial green corridor to run North-South on the Eastern border of the Southleigh site.

Thus, allowing a Woodland Walk and Green Corridor from north of Bartons Road to Emsworth Recreation Ground) to link up with the southern site with water retention ponds, including:

KP5, Southleigh Policy Statement C.vi

- a) The retention and integration of protected trees and hedgerows into the development
- b) The retention and enhancement of the on-site SINC in accordance with its original criteria for designation
- c) Mitigation measures for Bechstein's Bats, including appropriate buffers
- d) Enhancements to the Local Ecological Network through opportunity areas found on site
- e) The creation of green linkages and wildlife corridors including along the stream



In summary, this wealth of biodiversity data suggests strongly that development of this site should be resisted, and the application rejected.

Yours sincerely,



CPRE Hampshire