

Havant Borough Tree Wardens
Objection to Planning Application APP/21/00893

Outline planning application for demolition of the existing buildings and the erection of a new residential scheme (C3 use of approximately 210 dwellings to include affordable housing) and associated landscaping, access and supporting infrastructure, all other matters reserved. | Land north of Long Copse Lane, Emsworth, PO10 7UN

1. Ancient woodlands and veteran trees are irreplaceable.

Paragraph 118 of the National Planning Policy Framework (2012) states: *planning permission should be refused for development resulting in the **loss or deterioration** of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss ...'.*

Consequently, the Forestry Commission standing advice requires developers to identify aged and veteran trees as part of tree surveys and to show different root protection areas on plans (i.e. the larger Root Protection Areas appropriate to veteran/ancient trees).

The Ancient Tree Forum and the Woodland Trust consider that all ancient trees and mature veteran trees should be recorded in Category A3 in accordance with BS5837: 2012. Standing advice also recommends a larger root protection area for veteran trees, 'at least 15 times larger than the diameter of a veteran tree'. [Previous guidance – BS5837: 2012 – recommends the minimum root protection area to be at 12 times larger with a cap at 707m² (15m radius)].

2. Retention of veteran trees is one thing, avoidance of deterioration is another thing altogether...

Recent experience, and research using systems such as TreeRadar show the root systems of veteran trees are often more extensive and vulnerable than previously thought, e.g. veteran oak roots can extend up to 23m, a considerably wider area than the revised guidance.

In addition, if only the roots within a Root Protection Area are retained, the loss of damaged/removed root system outside the zone together with the mycorrhizal system surrounding in that area frequently lead to tree stress and subsequent death of the tree.

The mature and veteran trees in and around the site, (particularly those within the Dairy Lane copse), have grown within a unique, balanced climatic environment sustained over very many decades:

One of the most important qualities of this environment is the unique specialised biodiversity of the soil. Development directly impacts this balance regardless of whether “no-dig” or shallow scrape techniques are employed:

- ◆ Construction work almost inevitably means that soil will be compacted and/or polluted,
- ◆ The water table and/or drainage will be changed; fine roots and/or understory vegetation is destroyed, and soil is stripped of its ground flora and fungi
- ◆ Changes in levels of sunlight intensity, atmospheric moisture, and changes in air currents through their canopies, especially in combination with root and stem damage, will lead to opportunistic diseases and insect attacks, and the shortening of expected lifespan.
- ◆ Tree stress leads to reduced resilience and vulnerability to pests and diseases. Ultimately a tipping point in the physiological deterioration of the tree is reached, and its destruction.

3. The characteristics of these mature and veteran trees provide an essential habitat for a unique local assemblage of bat species. (Please refer to recent updates to Hampshire County Bat Recorder records.)

- ◆ Linear features (tree lines & hedgerows)
- ◆ Roosting features such as loose bark, splits, cracks, trunk hollows and rot holes
- ◆ Wet woodland (seasonal pond and roadside ditches)
- ◆ Ivy growth on trees
- ◆ Tree canopies overarching provide vital routes over obstructions such as roads (see photo below)
- ◆ A rural setting of relatively dark night skies and low levels of noise and disturbance.

Please use the “Tree Search” facility at **[ati.woodlandtrust.org.uk](https://www.ati.woodlandtrust.org.uk)** for Ancient Tree Inventory records regarding the verified Veteran trees likely to be harmed should the development proceed.

The last couple of years since 2019 have increased public concern about the destructive impacts of unsustainable projects on communities and the natural environment resulting from intense pressure to build on undeveloped green field sites.

We have also become more aware of the urgency of retaining and protecting existing trees and woodland, especially those mature specimens providing the most in environmental services.

4. Comments on the Transport Assessment Report & the Ecology – Arboriculture Report:

A1.1.1 “Surface water modifications making ditch and associated drainage channels obsolete” – **SuDS will likely have a negative impact on existing biodiversity, particularly invertebrate and aquatic species (e.g. within the old agriculture ditch system and seasonal pond in the Dairy Lane copse), and the health of adjacent trees.**

A.2.1 “Width of Hollybank Lane and of Long Copse Lane to be increased to 5.5m in some sections, with a 1.8m footway.” - **Likely impact to tree root systems, and impacts from main branch pruning.**

A.2.3

“Trees within a minimum of 450mm assessed for removal”, (“above height of anticipated traffic”). **(Prime Environment Ecology – Arboriculture Report mentions three individual trees and three tree groups, and suggests little impact will accrue. However, supporting detail of which trees and an assessment of their ecological contributions are absent).**

and “Proposed crown lifting to ensure branches do not overhang the carriageway at low level” - **These “branch bridges” provide essential bat foraging routes for woodland bat species on record (e.g. Myotis including Bechstein’s and Barbastelle).**

A.4.3

“Lighting column and boundary hedge obstructions are to be removed.” **(Prime Environment Ecology – Arboriculture Report mentions 10m loss of hedgerow, and a further 40m filled, but that 30m will be provided by new site. This does not allow for the real time it takes for new hedgerow to establish and be capable of replacing lost hedgerow in biodiversity terms.)**

5. Additional comments on the application:

It is premature

It pre-empts the final report of Government Inspection on HBC Local Plan to 2036. It also pre-empts the “Thornham Position Statement” on the Thornham wastewater facility sewage capacity limitation to 367 new houses.

Despite the ecological sensitivity of this area, too much is deferred to the detailed design stage.

This leads to a **lack of information** in the application with which to assess the likely negative impacts to biodiversity and rural character of Long Copse Lane. Clearly a Landscape & Visual Assessment is overdue.

There is still no report included on habitat fragmentation and the **Cumulative Impacts** of this proposal alongside other developments in the area, within Havant Borough Council and the neighbouring authorities.

There is still a particular lack of detail about **careful protection** and enhancement of existing biodiversity, including prevention of harm from increased human use of nearby Ancient Woodland, including impacts to Hollybank Wood. For example, this is evident from the lack of measures, such as secure fencing, to protect the vulnerable habitat of the Dairy Lane copse from human disturbance which would impact veteran trees and priority species dependent on this special area.

Havant Borough Tree Wardens have surveyed trees along Long Copse Lane and identified eight oak trees that have been included on the Woodland Trust's Ancient Tree Inventory, five classified as veteran and a further three notable. We have concerns over the root protection areas of five of those trees.

Three additional trees in the northern section of the Bat Copse have been included in the Ancient Tree Inventory, one veteran aspen that will require a specific root protection area and two notable oaks.

A decision on this application should be delayed pending the outcome of the Inspector's report on the HBC local plan.



Canopy overhanging Long Copse Lane