

Objection to Planning Application APP/21/00893
Land north of Long Copse Lane, Emsworth
on behalf of Havant Climate Alliance and Havant Friends of the Earth

The site north of Long Copse Lane provides a diverse habitat which supports a varied range of wildlife including bats. This includes the rare Bechsteins Bat (of national importance) and 9 other species (of local importance).

Value of grassland/horse paddocks

The Environmental Impact Assessments from Prime Environment and from Cotswold Environmental both refer to the horse paddock areas as being heavily grazed, to the extent of being “poached” i.e. muddy and trampled with little vegetation and there are photographs to support this. This is used as justification for dismissing this grassland area as being of little value for biodiversity, and therefore appropriate for housing development. However, this account is misleading. Local observers of the area report that the state of this grassland varies greatly from season to season, with lush growth in Spring and Autumn. Photographs of this are attached. “Poaching” tends to occur in Winter and even then only applies to parts of the grassland.

Devon Wildlife Trust have described the value of horse or cattle grazing areas to bats as they can feed off the insects attracted to the dung. Ref. devonwildlifetrust.org/sites/default/files/2021-01/Bats.pdf

Our opinion is that the horse paddocks provide part of the mosaic of foraging opportunities available to bats in the area. Even with trees and hedges retained, there will be a net loss of biodiversity if the development goes ahead on this site. This is contrary to Priority HC1 of HBC’s Climate Change and Environment Strategy to halt biodiversity loss, and support healthy, well-functioning ecosystems.

Trees

It is stated that Long Copse Lane can be widened to accommodate increased traffic, without damaging the roots of the valuable mature trees along the side of the road. This is doubted due to their shallow roots and risks running counter to Priority HC1 above.

New planting of trees to link Stansted and Southleigh Forests will increase habitat long-term but will take years to reach sufficient maturity to benefit bats and wildlife populations.

Local Plan Examination

Havant Borough Council should defer a decision about this site until the Examination of the Local Plan has been completed and its conclusions are known. The developers previously said that they would not submit an

application until then. Until recently this site was not even intended for development and is only being considered now because of the pressure for HBC to achieve its housing target numbers. Pressure on this site might be relieved if development on the Southleigh site and town centre regeneration plans could be expedited more quickly.

Waste Water and Nitrogen/Nutrient Neutrality

Although tree planting at Stansted Forest is planned to provide Nutrient Neutrality Mitigation this will not mitigate for additional volume of sewage going to the Thornham WWTW. This will increase the amount and frequency of stormwater discharges which make it more unlikely that actual Nutrient Neutrality can be achieved. This will be contrary to priority HC3iii of HBC's Climate Change and Environment Strategy to improve water quality and mitigate nitrate pollution. It is important that sea grass beds in our Harbours are allowed to recover. This needs not just Nutrient Neutrality but Nutrient Reduction.

Thornham WWTW is already at its capacity limits. Chichester District Council are therefore looking to restrict planning permissions because of this, which may be the reason why the developer is pressing ahead with a planning application now. There is not currently a pipeline from Thornham to Budds Farm, so the problem cannot be diverted. Although Budds Farm WWTW is said to have capacity to cope with all the developments contained in the Local Plan to 2037, frequent releases of stormwater indicate that it does not truly have capacity. Additional volumes of sewage from planned developments will increase stormwater discharges. Any new developments should be designed to have their own on site WWTW.

Loss of amenity

This development will cause the loss of a recreational facility for local people and campers who are currently able to ride horses and bicycles, and walk along it. The proposed off road cycle and walking path only extends along part of the length of LCL. The remaining part of the lane will become unusable for these recreations due to the increase in traffic. This will be contrary to Priority HC3ii of HBC's Climate Change and Environment Strategy, to promote active travel.





