

Date: 18 August 2018
Your ref Planning no: APP/18/ 00672
Title: Land off Westwood Close, Emsworth

Dear Daphney Haywood

I object to this application as it is an over-development of a cramped strip (currently in Flood Zone 1), and proposes an unacceptable loss of trees and hedgerows, resulting in a negative impact on nature conservation in a strategic Green Corridor from South Downs National Park to the internationally important Chichester Harbour.

It will also impact on the Blue Infrastructure capabilities of the River Ems Chalk Stream. It goes against most core objectives in the *PUSH Green Infrastructure Strategy*, notably the guidance that a river corridor can deliver multifunctionality (i.e. biodiversity & conservation enhancement, help with management of water/flooding, and contribute to sense of place, heritage and landscape appreciation).

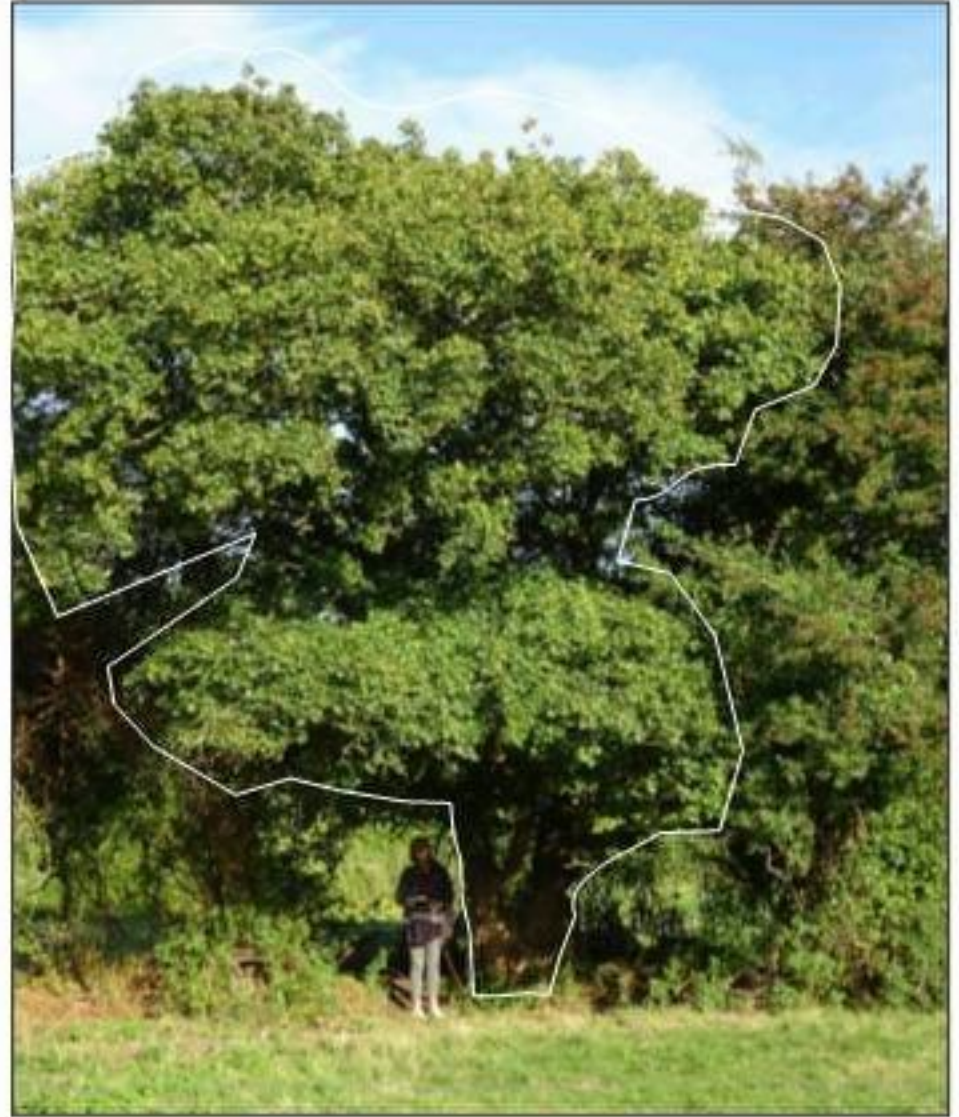
This is also stipulated in the new NPPF, which also sets out minimum requirements on developers re. SuDS.

My specific objections are as follows:

1. **The Site Layout shows a main access road running SE from Westwood Close before turning in a sharp bend South West.**
This exaggerated bend in the layout of this access road appears to be necessary to accommodate an extra 5 or 6 houses, but it is also the location of one of three gateways from the estate into the field, plus part of the re-located Sussex Border footpath (O.S 73). As a result, all three elements converge at an unsuitable pinch point within Flood Zone 2.
2. **The cramped and opportunistic nature of the layout for 46 homes gives rise to other undesirable effects.**
There is inadequate Root Protection Area (RPA) provision made for all the TPO'd trees to be retained;
 - This true of all the off-site TPO'd trees in Westbourne Avenue garden boundaries with the site.
 - In the case of the southernmost Oak (TPO 2071) closest to the access road, its measured diameter (119 cms) means this tree requires an RPA of 14.28 m (BS5837). In addition, this oak should be recognised as a "valuable veteran" according to Mitchell '74 & Read 2000, and of high ecological value.

It also has a wide-spreading canopy of 6.40 m from the South side of mid-trunk that is an attractive and integral part of its high Amenity value, and of its venerable characteristics. This should not be pruned to accommodate the access road.
3. **The portion of the Hedgerow in group TPO 2071 beyond the oak discussed above is to be removed to accommodate the access road.**
The Arboricultural Assessment & Management Statement (AAMS) reasons that this is permissible as the trees are of poor quality, make little contribution to local character and are negligible as skyline features. This glosses over important facts:

- Two Field Maples in particular stand out in the group as extremely interesting. They have been coppiced as part of a field hedgerow some decades ago, and now have developed features characteristic of old coppice: one is multi-stemmed with a diameter of 79 cms at 14 cms from ground level. The second an impressive twin-stemmed Field Maple has a diameter of 94 cms at approx 15 cms from ground level. These measurements suggest both could be considered *Ancient Trees*.
- Both Field Maples are approx 8m (26ft) high, and by no means "*negligible*". My photo to the right shows one of these trees. They are both healthy and have an attractive shape and position that contribute to visual amenity now and the future.



The twin-stem field maple trunk can be seen beside me.

4. **In addition, as part of a once managed agricultural hedgerow, these Hedge trees may meet the criteria to be retained as 'valuable'. Valuable here includes contributions in biodiversity terms.**

The hedgerows included in TPO 2071 and bramble banks nearby, are undoubtedly significant for their roosting, foraging and nesting potential for numerous Notable & UK BAP Priority birds on record as being present in this field (*Sussex Biodiversity Record Centre data*).

N.B. I am reviewing my survey results of the TPO'd hedgerow against Hedgerow Regulations. In the likely event that the results qualify the hedge to be recorded as **Important**, they will be referred to HBIC and I will notify the Case Officer of this.

5. **The provision of three "Connection Points" from the housing estate into the water meadow is unacceptable.**

The field and footpath are well used by local and visiting walkers and naturalists for tranquil exercise and enjoyment of a pleasant rural walk and scenery between two historic villages.

- Ball games, rough games etc. are inappropriate in this setting but inevitable given the lack of play spaces in the density of buildings in the housing estate. These gateways must prevent bikes, motorcycles, etc from accessing the field as is currently the case.
- There must be a Conservation Management Plan for the whole field and the River Ems.

6. **There is scant room for the proper and responsible provision of SuDS features (reed beds, swales, etc) to ensure the groundwater and run-off collected from hard surfaces used by vehicles, gardens, roof-tops etc is filtered before being fed into the River Ems.**

- This is essential if the current improved ecological quality of the river is to be maintained and enhanced in the near future.

- Restoration works carried in the West Sussex reaches of the River Ems in 2015/6 have rescued the river from a “*Poor*” ecological status (2009-15), and benefited the lower Westbourne and Emsworth reaches with enriched invertebrate levels, leading to increased populations of fish and other aquatic creatures, including mammals and birds.
- This gain will be jeopardised, and impact negatively on the conservation work carried out in *Brook Meadow Local Nature Reserve* for HBC on behalf the environment and the community, and *Peter Pond* (privately owned) both of which create natural habitats which in turn ensures clean water for Slipper Mill Pond and the Chichester Harbour via the Emsworth Channel.

7. **Lastly, the incomplete and flawed Environmental Appraisal produced by WYG attempts to claim (6.3) that “*No protected or ecologically notable habitats are present on the site*”.** This is contradicted by Sussex Biodiversity Record Data, and Hants Biodiversity Record Centre records, particularly regarding updated Bat data this summer, (both sets of data centred on this field).

The statement is further compromised by the recommendation that Reptile, Bat, Hazel Dormice are completed, and pre-commencement nesting bird surveys carried out.

Yours sincerely

Malinda Griffin