

**Deputation regarding**  
**APP/19/00768. Land to the rear of 15 – 27 Horndean Road, Emsworth**  
**on behalf of Havant Friends of the Earth and Havant Climate Alliance**

**We object to 16 houses being built on this Site of Importance to Nature Conservation or SINC.**

From the Ecologist's report this appears to be a site which has not been subject to agricultural improvement for a long time. Even with degraded grassland, we can expect a complex interdependent eco-system to have built up over time connecting trees, hedgerows, vegetation, bacteria, fungi, invertebrates, insects, amphibians, birds, mammals and possibly reptiles. It is not just about wild-flowers.

We concur with the views of the County Ecologist and CPRE. We do not think that this site can be compensated or mitigated, by leaving 30% of it as public space and establishing the equivalent of the remaining 70% as a new SINC area within the nearby Recreation Ground.

1. By doubling as a recreation area for residents, the 30% area will be less able to support biodiversity, e.g bats, of which several species have been recorded, need undisturbed foraging and roosting sites.
2. Establishing a new SINC area within the Recreation Ground cannot replicate the rich biodiversity of the original site. Such biodiversity can take years to build up.
3. The site was originally incorporated into policy KP5, forming part of the ecological network of sites, planned for the Southleigh strategic development area. However under Changes to the Local Plan it was removed from KP5 and now has a separate allocation as HX1. Regardless of allocation this site remains on the edge of the Southleigh development area and is well positioned to form part of the ecological network planned to run north-south along the eastern border of that development. As a more biodiverse site it could make a valuable contribution to that network, which will be less effective, without it. The proposals do not adequately meet Policy E14 of the emerging Local Plan. SINCS provide essential ecological infrastructure and should be a basis for ecological networks. The reasoning for ignoring this is very convoluted and leaves one concluding that no SINC site will be safe from the need for a rolling 5 year housing land supply.

**However if the development must go ahead**

We support the proposals for:

EV charging points by every house.

walking and cycling paths to the south and west.

low level street lighting with downward facing LEDs

a variety of bird and bat boxes being installed on houses or in the trees.

Notable and veteran trees must remain and higher level Root Protection Areas used during construction, as highlighted by the Tree Wardens.

Proposed tree and hedgerow planting of native species, should go ahead to infill and support a wildlife corridor along the stream on the western boundary, and to the south.

The on site grassland area and any alternative SINC in the Recreation Ground must be managed in perpetuity.

I can find no reference among the documents to the use of low carbon design and the efficient use of resources, other than water (E12 of the emerging Local Plan). These homes should be built using Passivhaus principles, with high thermal insulation values and with heat pumps or sufficient solar panels, to minimise their carbon output. These can be installed most cheaply at the building stage. New homes should not be built now, which will need expensive retro-fitting later.

Patricia Brooks