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Daedalus Park
Daedalus Drive
Lee on the Solent
PO13 9FX**

7th March 2025

Dear Havant Borough Council,

RE : Interbridges Site, New Brighton Road, Emsworth, Consultation Responses (APP/24/01010)

The following letter has been produced to provide responses to address the comments made by Havant Borough Council regarding the ecological reports submitted to support the proposed development of the Interbridges site, located on New Brighton Road, Emsworth as part of planning application APP/24/01010. It is anticipated that the associated documents and reports will be updated accordingly subject to the consultation responses being adequately addressed within this letter. The responses below have been laid out in accordance with the structure of the letter produced by Havant Borough Council (27th February 2025).

Ecological Baseline (Grassland Habitats)

Whilst it is acknowledged that the site is listed as containing the Priority Habitat 'Lowland Meadow', the initial updated baseline survey alongside periodic inspections of the site throughout 2024 (alongside the undertaking of updated bat activity work), did not indicate a species composition (including indicator species) or structure reflective of this habitat type. Notwithstanding this, prior to the undertaking of works in 2023, an updated baseline assessment undertaken by Ecosupport in May 2023, which is considered to provide a better indication of the grassland habitats on-site prior to the destructive search/ soil stripping undertaken in Autumn 2023. This survey recorded the site to be dominated by mixed scrub habitat with other woodland; mixed and a strip of other neutral grassland running through the site with a similar species composition as was recorded in the updated 2024 surveys present. The grassland recorded prior to the 2023 works was noted to not meet criteria 1 (>15 species m²) or 3 (<10% cover of rye grasses and White Clover) for Lowland Meadow within the UKHab framework, and unimproved indicator species were limited to Meadow Barley (*Hordeum secalinum*) which was recorded as locally frequent. In 2015, the baseline survey undertaken by Aluco Ecology recorded the grassland habitats within the site to be 'reverting to a herb rich semi-improved grassland' habitat, with the site noted to support a 'low number of unimproved grassland indicators' (with it noted that historical

management may have reduced the number of indicator species present). Since this period, the site has been cleared of vegetation and the topsoil stripped on two occasions in Autumn 2015, Autumn 2021 and October 2023 as part of the reptile mitigation works carried out under the granted planning permission (APP/16/00295). As such, it is considered that the classification of the grassland habitats with the site as 'g3c – Other Neutral Grassland' represents the most appropriate category within the UKHab framework.

Lighting Strategy

The proposed lighting design within the site (DFL 2024, DWG No.3477-DFL-ELG-XX-LD-EO-13001) will comprise of 16 DW Windsor (or similar) wall mounted LED lights, which will be fitted above the access ramps of the industrial units and controlled/activated by motion sensors (to further limit disturbance to nocturnal wildlife). As outlined within the lighting strategy (DFL, 2024), the strategy has been written in accordance with GN08/2023 *Bats and Artificial Lighting in the UK* (ILP / BCT, 2023), adopting appropriate warm white light sources, buffer zones and suitable positioning downwards to minimise vertical and horizontal light spill into identified sensitive receptors present along the sites northern and southern boundaries (within the adjacent lineside and highways estates). The car parking and access road will not be lit to avoid adverse impacts on the identified commuting corridors adjacent to the site boundary, with the rear exits of units 3-7 (northern boundary) also remaining unlit. As outlined with the lighting strategy (DFL, 2024) a maximum illuminance of 0.2 Lux is anticipated on the site's northern boundary, with lower levels of illuminance (<0.2 Lux) proposed along the site's southern boundary and encroaching woodland habitat.

Reptiles

As shown in **Figure 1** below, the reptile exclusion barrier erected around the site boundary following the second (previously undertaken in 2015) translocation works in October 2023 remains intact around the perimeter of the site. Notwithstanding this, whilst the habitats on site have been maintained throughout to reduce the sites suitability to support reptiles (with suitable habitat very limited on site comprising of scattered patches of grassland, and largely limited to the bunds created following the destructive search works with significant areas of bare ground present), it is acknowledged that there is low potential for dispersal into the site from the unenclosed North Street boundary during 2024. As such, in order to address this matter, it is proposed that an updated translocation capture is undertaken in line with best practise guidance as a precaution with captured reptiles to be moved to the receptor site previously utilised in 2023 (Patrica Way, Southbourne) (See Reptile Capture Works Ecology Note, Ecosupport 2024). Following the undertaking of recent translocation works in 2023, the intact exclusion fence and the very limited suitable habitat present on site, it is considered that 10-15 trapping days would be appropriate, however this of course will be guided by the results of the capture effort, with the exclusion period extended as necessary.

The following methodology will be utilised :

- The optimum period for capture of reptiles is April to June and September, however it is possible to capture reptiles outside of this period providing weather conditions are suitable.
- Suitably qualified ecologists will carry out the capture of reptiles during the active season on days where reptiles/amphibians are likely to be found (i.e. between 9°C and 20°C with little or no wind or rain).
- Reptiles will be captured by hand from beneath the artificial refugia and placed into a suitable container to be transported to the offsite receptor. All captured animals will be released into the receptor (Patrica Way, Southbourne) site immediately.

- Based on the undertaking of recent translocation works in 2023, the intact exclusion fence and the very limited suitable habitat present on site, it is considered that 10-15 trapping days would be appropriate, however this of course will be guided by the results of the capture effort, with the exclusion period extended where necessary.
- A targeted destructive search will be undertaken subject to requirements and informed by the results of the translocation effort.

Figure 1. Images showing sections of the intact reptile exclusion fencing located within the sites north-eastern corner (left) and along the sites northern boundary (Right) (March, 2025)



Nesting Birds

The on-site vegetation has been maintained following the clearance works undertaken in 2023 which has limited the suitable nesting bird habitat available to the woodland/ trees present within the site. Notwithstanding this, it is recognised that if left unmanaged, the scrub habitat on site has the potential to support nesting opportunities in addition to the retained trees on site. As such, as noted within the PEA (Ecosupport, 2024), all works will adopt the PMWS outlined within section 6.4 *Avoidance of Impacts to Breeding and Nesting Birds*.

Biodiversity Net Gain and Native Groundcover

It is acknowledged that in line with the BNG hierarchy that habitat offsetting should in the first instance always be targeted to be provided on site wherever possible. Notwithstanding this, following consultation with our client, it is clear that in order to maintain to commercial viability of the proposed project, the amount of available greenspace to provide suitable offsetting is highly limited, with the presence of numerous underground services (See Southern Gas Network/ South East Water notes on the landscape plan) posing a further constraint to what can be feasibly delivered on site as part of the offsetting to address the BNG deficit.

Whilst other potential solutions such as green roofs were discussed during the design phase, such features were not considered viable nor would these features act to offset habitats of 'medium' distinctiveness in the form of neutral grassland or Bramble scrub which form the entirety of the baseline habitats lost, due to the restrictions of the trading rules within the BNG metric, with these features being of 'low' distinctiveness (same broad habitat or a higher distinctiveness required).

In line with your recommendations, the proposed native groundcover species have been amended. These very marginal areas (amounting to 0.003ha) have been proposed due to the limitations of localised shaded conditions and are noted within the BNG metric as 'introduced shrub' to reflect their limited ecological value. The planting schedule within the formal landscaping areas have also been amended following your recommendations.

Habitat creation/ enhancement has been proposed where possible, however given the marginal size of the green spaces available within the current design, the proposal of 'higher value' habitats (medium or higher) was considered to be inappropriate in the smaller areas, with reasonable potential for damage and disturbance to occur during the site's operation. As such, whilst habitats such as modified grassland and introduced shrub correctly provide lower units for addressing BNG, due to the location and setting of these marginal areas within the site, the inclusion of these habitats or other habitats of 'low' distinctiveness was considered to be more appropriate and realistically achievable within these settings. Additional areas of scrub have been proposed within the updated landscape design, however due to the limited greenspace available these changes have had minimal impact on the deficit reducing it from 3.43 to 3.39 units.

Notwithstanding the above, I feel that it is prudent to note that the proposed layout design with regards to the ratio of hardstanding to green spaces is consistent with the previous layout that was granted under planning permission APP/16/00295 and therefore deemed acceptable previously, with our client purchasing habitat units following the implementation of statutory BNG to offset the habitat deficit (which would arguably not have been created or purchased if the granted permission for the similar scheme/ layout was taken forward as an alternative option).

Kind regards,

Gareth Ainscough MSc ACIEEM

Senior Ecologist