

From: Norton, Tristan
Sent: 22 August 2023 09:36
To: Wells, Lesley
Cc: Norton, Tristan
Subject: APP/23/00314 Hayling Island Service Station, 181-183 Havant Road, Hayling Island, PO11 0LG

Dear Lesley,

APP/23/00314 | Demolition of existing structures and erection of replacement kiosk store including integrated drive thru and associated development. | Hayling Island Service Station, 181-183 Havant Road, Hayling Island, PO11 0LG

Thank you for consulting me on this application.

The application is now accompanied by an amended Extended Phase 1 Habitat Survey & Daytime Bat Survey (Rachel Hacking Ecology, August 2023) and a Biodiversity Impact Assessment (Rachel Hacking Ecology, May 2023). The latter is a summarised assessment of Biodiversity Net Gain calculations.

As highlighted in my previous response, the proposed layout includes significant intrusions into the dense scrub habitat to the north and west of the existing site. The dense scrub with immature trees to the north of the existing buildings (Target Note 4 in the reports) is to be almost entirely lost/disturbed, equating by my approximate calculations to c.0.9 hectares. The ecology report states that this habitat is '*outside of the development footprint and will not be lost*' which is incorrect. These areas were not subject to full and detailed investigation within the original submitted Extended Phase 1 Habitat Survey & Daytime Bat Survey (Rachel Hacking Ecology, December 2022). Some additional information is provided, although this appears to relate primarily to habitats to the west where powerlines are present, rather than the more extensive scrub to the north. I therefore consider that impacts to these habitats (and their potential for supporting protected and notable species) require additional consideration, in the context of the submitted proposed layout plans: the extent of permanent loss and disturbance need to be quantified. This information must be provided prior to determination.

I should highlight that the plant species list includes Wild Liquorice which is most certainly a misidentification of this very rare plant of woodland in north Hampshire. This plant will not occur at this site and reference to it should be removed from the submitted information.

The application is also accompanied by a Shadow Habitats Regulations Assessment (Rachel Hacking Ecology, June 2023). The site is situated within close proximity to Chichester & Langstone Harbours Special Protection Area (SPA) and Ramsar site, the Solent Maritime Special Area of Conservation (SAC) and Langstone Harbour Site of Special Scientific Interest (SSSI). Whilst the proposed works are not within these sites, and direct impacts are unlikely, there is certainly a risk to the natural environment such that further information will be required to support any future full application. The Shadow HRA provides a reasoned screening of the potential impact pathways and identifies airborne and waterborne pollution, and noise and visual disturbance as having potential to result in a Likely Significant Effect on the protected sites qualifying features. These potential impacts are taken forward for further assessment. It

is proposed to include detailed pollution control measures within a Construction Environment Management Plan (CEMP), although outline measures are included such as waterborne and airborne pollution control, acoustic hoarding or the avoidance of the sensitive overwintering period. I am content with the outline measures within the Shadow HRA and these can be further developed within a CEMP.

The submitted landscaping contains areas of native shrub plantings, which is welcome. However, I would yet again highlight the need for professional ecological input into the selection of ornamental species. For example, the use of species such as Wilsons Honeysuckle *Lonicera nitida* and *Hedera canariensis* is not appropriate due to invasive tendencies: landscaping plants should pose no risk to the adjacent high-value coastal scrub and other habitats. Further consideration is required, and alternative species need to be chosen. This is a matter that needs attention prior to determination.

If you have any queries, please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

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