

**From:** Norton, Tristan  
**Sent:** 24 August 2023 11:12  
**To:** Miszewska, Arleta  
**Cc:** Norton, Tristan  
**Subject:** APP/23/00488 Land East Of, College Road, Purbrook, Waterlooville

Dear Arleta,

**APP/23/00488 | Application for mixed use residential development comprising 628 dwellings, community centre, allotments, public open space including play areas, new junction to College Road, related internal access road, footways and cycleways, pumping station and drainage basins. | Land East Of, College Road, Purbrook, Waterlooville**

Thank you for consulting me on this application. In summary, significant information is not available within this submission in relation to ecological mitigation, compensation and enhancement and it is therefore not possible for me to provide further commentary at this stage. There are fundamental issues with the deliverability of proposed off-site mitigation measures and it is not possible to have certainty over the ability of proposed mitigation to accord with the Habitats Regulations. The wintering bird mitigation proposals are not included within this submission, but rather submitted as a separate planning application: APP/23/00507 | Creation of an inner bund with a maximum height of 2.25m | Northney Farm, St Peters Road, Hayling Island, PO11 0RX. I will be providing a consultation response to that application in due course, following its validation.

This application is accompanied by an Environmental Statement (Tetra Tech, June 2023), Volume 1 Chapter 9 of which addresses ecological matters. I have also reviewed the submitted individual ecology reports detailing assessments for various protected species such as bats, Hazel Dormice and reptiles. There is reference (Ecological Appraisal p.13) to wintering bird surveys for the period 2020-23 although I cannot locate these survey results within the current submission.

As with previous iterations of this development, the main issue is the impacts to terrestrial supporting habitat for bird species associated with the Solent Special Protection Areas. The proposal as submitted will entail a substantial permanent loss of terrestrial supporting habitat within several sites featuring in the Solent Waders & Brent Goose Strategy (SWBGS). As summarised above, the submitted information does not include a confirmed mitigation/compensation proposal for these impacts, and I cannot therefore provide any commentary on the acceptability or not of any mitigation proposal. Previous discussions with the applicant team have centred around the use of compensatory habitat at Northney, Hayling Island. However, whilst having merit, the applicant proposals do/did not accord with longer-term strategic plans for coastal defence works at this location and are, I understand, unlikely to receive support from Coastal Partners and the Environment Agency nor assent from Natural England unless amendments have been made. Until such time as there is a deliverable mitigation/compensation solution that has the support of all relevant statutory consultees this application cannot be determined.

In terms of other ecological matters, the site has been shown to support various protected and notable species including bats (at least seven species using the site for foraging/commuting), Hazel Dormice (the species is present predominantly throughout the eastern half of the site within dense woody vegetation) and common reptiles (Common Lizard and Slow-worm are present in good numbers). Habitats are generally of limited botanical interest (i.e. are not particularly species rich) but the mix of semi-improved grassland, tall herbaceous vegetation, hedgerows, scrub and trees over an extensive area is clearly of ecological value. The cessation of grazing in recent years will undoubtedly have enhanced the site for many species. The

proposal leaves limited space for on-site habitat retention or creation, particularly for semi-improved grassland and valuable interfaces with scrub and hedgerow habitats. Key landscape features such as trees and hedgerows can be buffered, thereby providing habitat connections through and beyond the site but overall there will be an inevitable significant loss of biodiversity value. Given the fundamental issues surrounding off-site mitigation I will not provide detailed commentary on the on-site measures at this stage.

NPPF, Circular 06/2005 and Natural England Standing Advice, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the Local Planning Authority prior to determination, particularly in the case of protected sites, habitats and species, which are a material planning consideration. This will enable the Local Planning Authority to determine the application on the basis of full knowledge about the potential ecological impacts of the proposal and to ensure that any impacts can and will be mitigated.

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

Kind regards,

Tristan

**Tristan Norton**

**Principal Ecologist** | E: [tristan.norton@havant.gov.uk](mailto:tristan.norton@havant.gov.uk) M: 07552 248974

**Planning Services**, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX



More details at [www.havant.gov.uk/nitrogen](http://www.havant.gov.uk/nitrogen)



Your privacy matters. Go to [www.havant.gov.uk/privacy-policy](http://www.havant.gov.uk/privacy-policy)

Information in this message is confidential and may be privileged. It is intended solely for the person to whom it is addressed. If you are not the intended recipient, please notify the sender, and please delete the message from your system immediately.