

APP/21/00989 | Outline planning application for the development of 150 dwellings (3-bed; 4-bed and 5-bed dwelling houses and 1-bed and 2-bed apartments) addressing layout, scale and access, including biodiversity enhancements and buffers and species-specific enhancements, SUDS and car parking (with appearance and landscaping matters reserved). | Cabbagefield Row, opposite 123-133, Swanmore Road, Havant 23.0085

Thank you for consulting me on this application.

The application is accompanied by an amended Ecological Impact Assessment (ECOSA, January 2023). The site comprises a mix of good-quality semi-improved grassland (located in the northern parcel and designated as a SINC) and scrub and is bordered by areas of ancient semi-natural woodland (also SINC). The site is clearly of some ecological value, and has been shown to support Hazel Dormice (breeding), various species of foraging/commuting bat, a range of breeding bird species, at least three species of reptile, and a number of notable invertebrate species. A number of these species populations are considered to be of County importance and the site would clearly qualify as a Site of Importance for Nature Conservation (SINC). The site sits within a landscape containing extensive areas of semi-natural habitat, with significant development occurring. The proposed development should be seen in the context of the adjacent ongoing Dunsbury Farm developments and the permitted Havant Thicket Winter Storage Reservoir. This landscape is, and will be, undergoing profound change in the coming years.

I would highlight that the various species survey plans within the EIA appendices are oddly formatted. Some details of species locations are obscured by the chosen symbology, such that it is not clear what has been recorded. Map 9 is a good example of this.

In terms of vegetation communities, the southern parcel of land is not of particularly high quality and is best described as poor semi-improved grassland with scrub. Whilst not botanically rich, the habitats clearly provide a substantial area of semi-natural vegetation used by various protected and notable species: Hazel Dormouse being the most notable example. The northern parcel is designated as Dunsbury Hill Grassland 2 Site of Importance for Nature Conservation (SINC). This SINC is one of numerous other grassland and woodland SINC in the landscape, including the immediately adjacent Dunsbury Hill Wood and Cabbagefield Row SINC, both ancient semi-natural woodland. The vegetation assessment concludes that the SINC grassland does not currently conform to previous value judgements, although the purpose of SINC is to protect habitats which also retain sufficient elements of unimproved grassland that could be restored through sympathetic management.

The area to be developed supports a range of species of conservation concern including Hazel Dormice, foraging/commuting bats, breeding birds, common reptiles and notable invertebrates. The near-total loss of habitat within the southern parcel will result in a significant impact to these species that is not readily mitigated. These habitat types in isolation could be described as of low value but in reality their ecological value is inherently linked to their function as supporting habitat for various species.

Given the importance of this area to nocturnal species such as Hazel Dormice and bats, and the presence of various notable invertebrate species, the impacts of artificial lighting are potentially significant. The submitted Lighting Strategy (WSP, December 2022) contains a lux contour plan (at Appendix B): this plan is blurry and I am unable to clearly read it and determine the lux levels at each illustrated contour. I would request that a high-resolution plan is submitted before I provided further comment.

The proposal will result in the loss of habitat used by a breeding population of Hazel Dormice: the site is likely to be of County importance for this declining species and likely to qualify as a SINC on that basis. The amended EIA does not quantify the impact to Dormouse habitat. Compensatory habitat is to be provided within the site through the proposed landscape/woodland buffers (though this is not quantified, and habitat will presumably require establishment and growth before equating to the lost habitat, as well as being situated immediately adjacent to new development) as well as an as-yet-unidentified off-site location. The location, extent and ongoing management of any off-site habitat for Dormouse compensation will be required prior to determination: it is not appropriate to defer these details to a future reserved matters submission. At the point of decision the LPA must be able to determine whether any proposed compensatory habitat is suitable and likely to provide a similar function to the habitat being removed.

Overall mitigation, compensation and enhancement is reliant primarily on the management of the Dunsbury Hill Grassland 2 SINC, the aim of which is to bring the site into better botanical condition. This is a welcome measure, but no firm details are provided of how this will be achieved. I consider that further details of proposed management should be provided now, alongside details of how success will be monitored and gauged. I do not consider that these details should be left to condition.

Similarly, for nesting birds there will be an overall loss in habitat. The southern parcel of land supports a range of species reliant on scrub and woodland habitat, all of which will be removed. Again, it is unclear whether the proposed woodland buffer habitat will provide suitable compensatory habitat for the species recorded: I would suggest that species such as Yellowhammer, Linnet and Bullfinch would be highly unlikely to continue to nest in close proximity to built development and therefore the on-site compensatory buffer habitat will be ineffective. Again, an unidentified off-site area of habitat is proposed: further details of this site will be required prior to determination.

I am unclear how the stated aim of increasing grassland condition within the northern SINC, presumably via grazing or mowing, is consistent with the use of this area as a reptile receptor area. Increasing botanical diversity would require the regular management of the grassland and the removal of arisings: to make the area more suitable for reptiles will require areas of longer, unmanaged grassland and scrub.

In summary, the proposed development will result in significant biodiversity loss, entailing the removal of habitat occupied by several protected and notable species. The site is of sufficient biodiversity value to likely qualify as a SINC in its own right. There is insufficient detail presented in terms of compensatory habitat, such that it is not possible for me to determine if impacts can be mitigated. The outline nature of the application means that crucial details for assessing the impact and effectiveness of compensatory measures are not included.

NPPF, Circular 06/2005 and Natural England Standing Advice on Protected Species, 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 LPA prior to determination, particularly in the case of protected species, which are a material planning consideration. This will enable the LPA to determine the application on the basis of full knowledge about the ecological impacts of the proposal and to ensure that any impacts can and will be mitigated, and are acceptable.

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

Kind regards,

Tristan

Tristan Norton

**Senior Ecologist
Ecology Team**

Specialist Environment Services