Consultee Comments for Planning Application APP/22/00439

Application Summary
Application Number: APP/22/00439
Address: The South Downs College, College Road, Purbrook, Waterlooville, PO7 8AA
Proposal: Redevelopment of southern section of site to provide 102 dwellings comprising 56 No. 2, 3 & 4 bed houses and 46 No. 1 & 2 bed flats with associated parking, landscaping, waste and cycle storage. New roundabout access from College Road.
Case Officer: Arleta Miszewska

Consultee Details
Name: Mr Tristan Norton
Address: Elizabeth II Court West, The Castle, Winchester SO23 8UD
Email: Not Available
On Behalf Of: County Ecologist, Strategic Environmental Delivery

Comments
Dear Arleta,

APP/22/00439 | Redevelopment of southern section of site to provide 102 dwellings comprising 56 No. 2, 3 & 4 bed houses and 46 No. 1 & 2 bed flats with associated parking, landscaping, waste and cycle storage. New roundabout access from College Road. | The South Downs College, College Road, Purbrook, Waterlooville, PO7 8AA 23.1036

Thank you for consulting me on this application.

The application is accompanied by an Ecological Assessment (Pro-Vision, April 2022). The site comprises a large area of predominantly hardstanding with associated areas of semi-improved grassland/scrub with numerous planted trees. The proposed development area includes a modern building immediately north of the hardstanding. The site is bordered to the south, east and west by strips of broadleaved woodland. The site sits at the southern end of the South Downs College complex, with extensive areas of ancient woodland to the north/north-east. The land to the south of the site comprises extensive open semi-improved grassland.

The site has been subject to detailed ecological surveys throughout 2021, including surveys for Badgers, bats, Hazel Dormouse and reptiles. I am content that the scope, content and timings of ecological surveys are acceptable.

The site supports Badgers, with active setts located within the site boundaries. I agree that much of the site comprises unsuitable hardstanding habitat, and that the animals will be utilising the surrounding woodland and especially grassland habitats located south of the site. The proposals

currently entail the loss of much of the eastern boundary vegetation which includes direct impacts to Badger setts.

The modern building in the north of the site is considered to offer negligible potential for supporting roosting bats, and none of the trees within the site are considered to offer potential for tree-roosting bats. The site sits within a landscape known to support a diverse bat assemblage, including very rare/scarce species such as Bechsteins Bat and Western Barbastelle. The bat activity surveys carried out at the site have covered the main bat activity season and will have provided a robust assessment of bat activity. The site unsurprisingly supports a good number of flying bat species but is dominated by the common and widespread Common Pipistrelle. A good percentage of recordings from the automated detectors were from the Mouse-eared Bat group which may include the very rare Bechsteins bat. A small number of Western Barbastelle were recorded, as well as Nathusius Pipistrelle.

Key locations for bat activity were the eastern boundary, with greater numbers of bat recordings at this location for most species, although the southern and western boundaries were also shown to support good levels of bat activity. The majority of these boundaries will be retained within the proposed scheme, although there are to be impacts to the eastern boundary entailing the loss of most of the woody vegetation here. Given the demonstrated value of this eastern boundary I would again query whether the proposed scheme design has first sought to avoid ecological impacts: this boundary vegetation is of value for bats, contains active Badger sett entrances and currently provides a useful buffer between the site and the adjacent SPA supporting habitat (see below). This does not conform to the mitigation hierarchy (avoid-mitigate-compensate) as set out in NPPF, especially as there is very little compensatory habitat proposed within the scheme. There is also loss of native woody habitat to the west to accommodate the new roundabout.

The proposed landscaping compensation comprises four relatively limited areas of wildflower planting and no/minimal replacement woody vegetation. The eastern boundary becomes a thin line of retained vegetation immediately bordering residential gardens. It is difficult to see how this retained vegetation will provide the same function as the existing boundary vegetation.

The presence of active Badger setts in such close proximity to residential dwellings has the potential to result in human/Badger conflict: Badgers will routinely forage within gardens and can and do undermine fences and buildings by tunnelling. Again, this is hard to reconcile with the need to avoid ecological impacts.

Land to the south is listed in the Solent Waders & Brent Goose Strategy (SWBGS) for its function as winter terrestrial supporting habitat for bird species associated with the nearby Solent Special Protection Areas (SPAs). Whilst there will be no direct loss of this supporting habitat, the proposal could result in construction-phase noise and visual disturbance within very close proximity, and the presence of new residential dwelling is likely to result in further recreational disturbance pressure on habitats used by wintering birds. I wish to see consideration of this potential impact.

Overall, further to the queries raised above, there will be a need to provide firmer details of proposed ecological enhancements such the number and type of bird/bat boxes within the developed spaces. Given the number of new dwellings there is ample opportunity for ambitious numbers of integral bat and bird boxes, as well as greater use of more sympathetic plantings designed to incorporate biodiversity gains within the development.

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 dont hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

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