

Consultee Comments for Planning Application APP/22/00669

Application Summary

Application Number: APP/22/00669

Address: Land at Kingscroft Farm adjacent to Ridgway and, Marples Way, Havant

Proposal: Outline planning application with all matters reserved (except for access) for the development of up to 120 residential dwellings (C3 Use), with access from Meyrick Road, the provision of open space, landscaping and other associated works including demolition of existing buildings on site.

Case Officer: Lesley Wells

Consultee Details

Name: Consultee Principal Ecologist

Address: Public Service Plaza, Civic Centre Road, Havant PO9 2AX

Email: Not Available

On Behalf Of: Ecologist

Comments

Dear Lesley,

APP/22/00669 | Outline planning application with all matters reserved (except for access) for the development of up to 120 residential dwellings (C3 Use), with access from Meyrick Road, the provision of open space, landscaping and other associated works including demolition of existing buildings on site. | Land at Kingscroft Farm adjacent to Ridgway and, Marples Way, Havant

Thank you for consulting me on this application.

The application is accompanied by an amended Preliminary Ecological Appraisal, a Bat Activity Surveys report, a Dormouse Survey report and a Reptile Survey & Mitigation Strategy report (all EcoSupport, May 2023). There is also an Ecology Note, seeking to address previous comments.

I acknowledge that surveys for Hazel Dormouse have been completed and that this species is likely absent from the site. The site has been shown to support a small population of Slow-worms. Bat activity surveys have demonstrated that the site supports a reasonable assemblage of foraging/commuting species, dominated by the two commoner Pipistrelle species. The site is considered to be of local value for bat species. The bat report would very much benefit from bat activity mapping it is not possible for the reader to readily appreciate where within the site bat activity was observed. This is important in terms of understanding the potential impacts of e.g. lighting and habitat loss.

The proposed development will occur within the large open areas of grassland in the eastern half

of the surveyed area. These areas are stated as comprising grazed, semi-improved grassland. The fields immediately west of the site are botanically interesting, and are best described as floodplain pasture with saline elements. These pastures are mapped as the Priority Habitat Coastal and Floodplain Grazing Marsh. There are a number of interesting plant records from these grazed fields. I note that records held by the Botanical Society of Britain & Ireland (BSBI) contain many more species than those identified within the ecology report - and indicate a rich floodplain grassland flora, likely to be of county level interest. The botanical interest of these fields is maintained through the underlying geology and hydrological conditions but also crucially by continued grazing. The loss of semi-improved grassland within the application needs to be addressed, and presumably there will be a proposal to either retain elements of the existing grassland (preferable) or to (re)create a similar habitat type within the developed area. At this stage, no indication is given of what landscaped areas will comprise. I acknowledge the outline nature of the submission, but landscaping is fundamental to understanding whether identified ecological impacts can be mitigated/compensated adequately and therefore intrinsic to the ecological assessment.

The northern/western boundary of the site is adjacent to the Hermitage Stream, a valuable watercourse of high ecological value. There is potential for development proposals to result in impacts (direct and indirect) on the stream and its riparian habitats and the species associated with them. I acknowledge the intention to provide a buffer to the stream corridor (8 metres has been stated) but clearly the outline nature of the application provides limited reassurance that this will be deliverable as a minimum. I note that the Ecology Note contains some additional information regarding drainage, with the drainage consultant confirming that the fields to the west (and the Hermitage Stream) would not be affected by development of the application site. I would defer to your drainage consultee to determine the extent to which the proposed drainage strategy is likely to affect hydrological pathways on the adjacent land.

Whilst I acknowledge the outline nature of the submission, the application is still lacking detail on ecological avoidance, mitigation, compensation and enhancements, particularly in relation to the treatment of retained grassland habitat within the development site and the long-term management of the species-rich grassland to the west: without at least outline details of these matters it is not possible to ascertain what the ecological impacts are. The submission includes a Grazing Licence, although no details are provided (even in outline) of how and for what purpose any land will be managed and I am unsure what the context is for the submission of this licence: it is not referred to within the ecology submissions. Whilst this is indeed an outline application it is essential that an outline framework for ecological mitigation, compensation and enhancement is provided now in order that ecological impacts can be assessed by the Local Planning Authority. I would therefore request that further detail is provided on the aims, objectives and outline prescriptions for ongoing on-site and off-site habitat management.

I note the intention to provide a substantial number of integral bat boxes and nest boxes for Common Swift.

In summary, I consider that clarification is required in respect to both ecological impacts and mitigation, compensation and enhancement measures. I would recommend that an outline ecological mitigation, compensation and enhancement strategy is provided. This should set out in particular how the identified impacts to semi-natural grassland habitat are to be mitigated/compensated and how fields to the west of the site are to be managed.

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

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