

Clark, Jacky

From: Norton, Tristan <Tristan.Norton@hants.gov.uk>
Sent: 28 June 2023 10:40
To: Miszewska, Arleta
Cc: Havant Planning and Development Mailbox New
Subject: APP/22/01231 Land at, Palk Road, Havant 23.0098

CAUTION: This email came from outside of the council - only open links and attachments that you're expecting.

Dear Arleta,

APP/22/01231 | Redevelopment of a brownfield site to include the provision of 4No. Apartment blocks comprising of 90No. residential dwellings (including 27 affordable units) (Use class C3 residential), parking, public open space, landscaping and other associated works, including demolition of existing buildings on site, with access from Palk Road | Land at, Palk Road, Havant 23.0098

Thank you for consulting me on this application. Thank you for your patience.

The application is accompanied by an amended Ecological Impact Assessment (ACD, June 2023).

The site comprises a classic 'brownfield' site containing areas of hardstanding, scrub, soil/rubble piles, ruderal vegetation and grassland. The main area of vegetation is within the north-east, comprising dense bramble-dominated scrub admixed with tall herbaceous vegetation and semi-improved grassland. Further information has been provided on the botanical composition of the site, with a botanical survey having been carried out in May 2023. This additional information is welcome and provides a more robust assessment of the site's ecological baseline. The site contains a range of typical vegetated brownfield species and confirms that no populations of county notable/scarce species are present. There are some individual or small numbers of more interesting species present. I note that the plant shown in Photograph C, and described as Mare's-tail (a native species) is Field Horsetail (also a native species). Mare's-tail (*Hippuris vulgaris*) is a native aquatic plant species. Field Horsetail (*Equisetum arvense*) is native and can be problematic and persistent in terrestrial habitats.

I am content that the site is predominantly of limited value. Its apparent isolation is a factor likely to limit its suitability for reptile species, but the site has essentially been unmanaged for many years and seems to offer optimal conditions for reptiles. I note that acknowledgement is provided of the site's potential to support small numbers of common reptile species. Recommendations for impact avoidance and mitigation are provided and are acceptable.

For clarification, the site is NOT within the Solent Waders & Brent Goose Strategy (SWBGS): SWBGS Site 10b was removed from the strategy.

I am content to agree that the site is unlikely to be especially valuable to other species such as foraging bats and is not suitable for roosting bats, Hazel Dormouse and Great Crested Newt. There is certainly potential for small numbers of nesting bird species, and this is acknowledged and avoidance and mitigation measures proposed. Again, I would like to see an ambitious number of integral nesting features for e.g. Common Swifts and roosting features for bat species: these integral features are inexpensive and effective. Further detail is required on this issue at this stage, rather than deferring this to a pre-commencement Landscape & Ecological Management Plan (LEMP): an indication of the number, type and general location of such enhancement features is required.

The proposed open greenspace within the south of the site provides an opportunity for meaningful biodiverse habitats, especially in such close proximity to the Hermitage Stream. Little-to-no detail is provided within the EIA on these measures and I would request some further detail on exactly which habitats are to be created and how. For example, the Landscape Masterplan and EIA states that 'meadow grassland' will be created: further detail is required at this stage to determine the composition of this habitat and how it will be established, managed and monitored. Full details can be secured through a LEMP but at least outline details are necessary at this stage.

The post-development landscaping should result in an improved situation, especially adjacent to the Hermitage Stream. However, the EIA includes no details of measures to protect the Hermitage Stream from obvious construction impacts such as pollution: full details can be provided within a Construction Environment Management Plan (CEMP) but outline details are required at this stage.

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
Universal Services Directorate
Hampshire County Council
Elizabeth II Court West
The Castle, Winchester
Hampshire SO23 8UD
Mobile: 07784 261774

E-mail: tristan.norton@hants.gov.uk; www.hants.gov.uk/biodiversity

If your request is for ecological assistance for an internal scheme, please instead complete this form PLEASE NOTE THAT THIS IS A NEW FORM <https://forms.office.com/e/hz5E2PeaZ1>

Coronavirus (Covid-19)

Hampshire County Council's response to Covid-19 is available here (<https://www.hants.gov.uk/socialcareandhealth/coronavirus>).



Hampshire Services offers a range of professional consultancy services to partner organisations.

Specialist Environment Services provides data, advice and assessments for ecology, heritage and landscape.

www.hants.gov.uk/sharedexpertise



Please consider the environment before printing this email.

Please note that this advice is given in accordance with the Service Level Agreement that has been signed between Hampshire County Council and your Council. These comments are expressed as a professional view provided to Havant Borough Council and should not, therefore, be interpreted as those of Hampshire County Council.