

Houghton, Michelle

From: Wells, Lesley
Sent: 08 April 2021 14:04
To: bst shared
Subject: FW: APP/21/00189 | Brockhampton West, Harts Farm Way, Havant

Hi

Please upload.

Thanks Lesley

From: Miri, Maral [mailto:Maral.Miri@hants.gov.uk]
Sent: 08 April 2021 13:58
To: Wells, Lesley <Lesley.Wells@easthants.gov.uk>
Subject: APP/21/00189 | Brockhampton West, Harts Farm Way, Havant

Dear Lesley,

APP/21/00189 | Outline application for the development of new employment units to provide up to 29,000 sq m (gross internal area) for flexible use across use classes E (light industrial), B2 and B8 with ancillary offices, car parking, service yards, drainage works, landscaping and associated works to prepare the site for development. All matters are reserved except the primary means of access to the site. | Brockhampton West, Harts Farm Way, Havant

Thank you for consulting us on this planning application which is supported by an Ecology Report by Applied Ecology Ltd (February 2021). Overall, I have a number of concerns and request that permission is not granted until further information/survey work is carried out. My comments are detailed below:

Designated sites

The western part of the site is located within a Solent Waders and Brent Goose (SW&BG) Strategy 'Low Use' site H08. All 'Low Use' sites have the potential to be used by waders and Brent geese and the unmitigated loss of these sites would in combination negatively affect the long-term resilience of the network. Whilst for the loss of 'low use' sites proportionate mitigation in the form of off-setting or enhancement measures via payment towards the management and enhancement of the wider waders and Brent geese ecological network would be required, as per the latest guidance received from Natural England, it would be the applicant's responsibility to identify any areas which the financial contribution could be spent on to benefit the SW&BG network. Furthermore, SW&BG Core Area H07A, Secondary Support Area H07B and Low Use Site H07C are located to the south of the site. Whilst a road separates the application site from these network support areas, further information is required to ensure these sites will be protected against any indirect impacts such as noise and visual disturbance, pollution incidents, etc. In the absence of this information, the LPA is unable to confirm that the proposals will not result in any likely significant effects on the integrity of the designated sites. Therefore, further information is required.

Chichester and Langstone Harbours SPA and Ramsar and Solent Maritime SAC area located 170m south of the site. Due to the short distance and presence of a hydrological pathway, likely impacts on the integrity of these designated sites in the absence of mitigation and avoidance

measures cannot be ruled out. Therefore, it is recommended that a Shadow Habitat Regulations Assessment (HRA) is submitted, to provide the LPA with sufficient information.

Due to the presence of a hydrological link, any potential impacts on non-statutory designated sites such as Farlington Marshes SINC should be included in the submitted ecology report.

Protected Species

Dormice

The tubes were installed in July on site and only two checks in August and September were carried out, which confirmed the likely absence of dormice. Whilst the number of tubes were doubled, installing tubes this late in the season and a minimal survey effort of only two checks is not considered to be acceptable and therefore I am not satisfied that the survey findings are robust enough. It is also not clear how deploying 100 tubes was achieved. Having considered the size of the site and measured the areas of suitable habitat for dormice and considering that the tubes should be spaced 20m apart (minimum of 15m apart), it is unlikely that more than 50 tubes could have been installed, without spacing them too close to each other. Therefore, further survey work/justification is required.

Foraging/commuting bats

The transect and static surveys were carried out in late July, August and September. No surveys were carried out early in the season as per the guidelines (April – June) and therefore further survey work/justification is required in relation to the robustness of the findings, considering that the bat assemblage for site in spring/early summer is missing.

Water Vole

The report states that a survey for water voles was undertaken in February 2021 and no evidence was recorded. Unfortunately, a single survey in February outside the survey season is not considered to be sufficient survey effort in line with the current good practice guidelines. The revised guidelines state that as the suitability of habitat for water voles can change markedly over the course of the breeding season, affecting the distribution and apparent population size, two survey visits should be undertaken in most cases: one in the first half of the season (mid-April to end of June) and one in the second half of the season (July to September inclusive) (Dean et al. 2016). However, I acknowledge that this waterbody will not be directly affected by the proposals and provided that an appropriate buffer and soft landscaping scheme is implemented, I raise no major concerns.

Habitats

A number of notable plants were recorded on site such as corky-fruited water-dropwort and pyramidal orchid. Therefore, further information in relation to the impact of the proposals on the grassland habitat on site and appropriate mitigation is required.

The submitted ecology report should include a section detailing the impacts of the proposals on the habitats present on site and how the proposed soft landscaping scheme will ensure no net loss in biodiversity. The applicant's ecologist may consider the use of the latest version of the Defra Biodiversity Metric to demonstrate in a measurable way that the proposals are in accordance with the NPPF.

Based on the above, I recommend that permission is not granted until further information is submitted.

Please do not hesitate to contact me if you require any additional information.

Kind regards,

Maral

Coronavirus (Covid-19)

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

In line with Government advice to reduce non-essential travel and work from home where possible, Ecology officers are now working remotely. Whilst we will endeavour to conduct our services in a timely manner and to meet statutory timescales where we can, there may be some impact to the services we deliver. We will ensure that we keep all applicants / interested parties informed of any further impacts to our services should they arise. The Council's response also means that no non-essential site visits or face to face meetings will be undertaken until further notice. Essential and contractual surveys may continue take place where there is no risk to the surveyor or the public, and in line with Government advice. This will be reviewed on an on-going basis.

Maral Miri (MSc, CEnv, MCIEEM)

Senior Ecologist

Ecology Team

Economy, Transport and Environment Department

Hampshire County Council

Elizabeth II Court, 1st Floor West, Winchester, Hampshire SO23 8UD

Tel: 01962832265

Mob: 07784261735

E-mail: Maral.Miri@hants.gov.uk;

<https://www.hants.gov.uk/landplanningandenvironment/environment/biodiversity>

Please consider the environment before printing this email



Did you know that HCC now offer an Environmental Data and Advice Service (EDAS)? It's a new service for developers and investors, providing a combined feasibility assessment across a number of environmental disciplines, for any site in Hampshire. For more information please go to <http://www3.hants.gov.uk/edas> or contact us at edas@hants.gov.uk.