

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 Ecological Impact Assessment (ACD, December 2022). I provided some pre-application advice on this proposal in March 2022.

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. Whilst I am happy to concede that these habitats are not likely to be of significant ecological value, my own desk-based assessment reveals records of notable plant species such as Small-flowered Buttercup and Lesser Centaury from similar habitats in the immediately adjacent area. Brownfield sites often contain nutrient-poor conditions favoured by interesting plant species and can be important habitats at the local level within an urban/suburban context. This information was included within my pre-application comments, with the hope/expectation that a detailed botanical assessment would be carried out at a suitable time of year. The vegetation was assessed in December, a time of year when many plant species are not visible and where others require detailed knowledge to identify them. This would explain why the report includes descriptions such as 'thistle species', 'plantain species' and 'buttercup species': identification of widespread species should not be difficult if vegetation is assessed at a suitable time of year.

The limitations in the vegetation assessment notwithstanding, I am content that the site is predominantly of limited value, containing minimal vegetation. 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 would be very hesitant to dismiss the site's potential for supporting a reptile population.

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. 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.

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 detail is provided on these measures and I would request some further detail on exactly which habitats are to be created and how.

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**