



APP/21/00189

Response to Hants County Council Ecology consultation email 8.4.21

Designated Sites

SWGBS – Off-setting conservation payment

The Solent Wader and Brent Goose Strategy (SWGBS) Guidance on development mitigation and off-setting requirements provides information on how off-setting compensation payments are calculated but offers no information on how or where the calculated compensation payment should be spent to further brent goose and wader conservation. The wording of the agreed Mitigation Strategy states the following (paragraph 38):

“The funding secured, via section 106 agreements, will be used to enhance, manage and monitor the wider Solent wader and brent goose ecological network. This funding will be managed by the respective local authority and will be used to support schemes across the network, this includes those in neighbouring authorities”.

Natural England advise that the proposed compensation funding should be managed by the respective Local Authority to support schemes across the SWGBS network, but also state that where no such strategic schemes are currently available, the onus falls on the applicant to provide a suitable mitigation solution.

In this instance as the Local Authority has formally identified the land at Harts Farm Way for development in the full knowledge that it is part of the SWGBS network, we would expect the Local Authority to have identified a conservation scheme within their SWGBS network area to which the compensation payment could contribute. As there does not appear to be any SWGBS advice or guidance on how and where to deliver off-setting compensation, it is unreasonable to expect the applicant to find a scheme where there is no information on landownership and landowner willingness to enter a scheme for a pre-determined compensation fee payment that the landowner may not agree to. With this in mind, it is entirely incumbent on the Local authority to identify and agree a conservation management scheme that the applicant can make a compensation payment towards if the SWGBS compensation payment approach is to be successful in achieving its aims and objectives.

Habitat Regulations Assessment

A Habitats Regulations Assessment (HRA) has been produced by Applied Ecology Ltd in support of the APP/21/00189 development application that addresses the potential impacts identified by the HCC ecologist on the local SPA, SAC and Ramsar.



Protected Species

Dormice

The attached Figure 1 shows the location of the 100 dormouse tubes employed during the dormouse survey – the average spacing between the tubes was 15 m and is in line with best practice survey guidance. On that basis our survey approach and findings are valid.

In any event, the presence of dormouse within the Site can be considered low risk as the Site is isolated by major road networks from known dormouse populations to the north, with the A27 motorway providing a significant barrier to dormouse colonisation. Guidance published by the Peoples Trust for Endangered Species and Natural England suggests that isolated woodlands need to be at least 20 ha in total area to maintain a viable population of dormice and, given that the plantation woodland and scrub within the Site amounts to less than 3 ha in total area, the presence of dormouse on Site can be seen as very low risk on the basis of the Site's isolated location and limited extent of dormouse friendly habitats.

In summary, a robust and valid dormouse survey has been completed that reasonably concludes the likely absence of dormouse from the Site, and we believe it would be unreasonable for further survey and assessment in the circumstances.

Foraging/Commuting Bats

The bat activity survey work that has been completed was conducted in accordance with best practice survey guidance and provides a robust assessment of the range of bat species using the Site, bat numbers, foraging and commuting activity. The bat activity surveys were completed in the second half of the summer and autumn at a time when both adult and the years young bats would have been active within the Site – a time of maximum bat activity.

Further survey in the spring and first half of the summer, while of academic interest, is highly unlikely to significantly change our assessment of bat use of the Site or change the recommended layout and scale of the development or, most importantly, change the recommended mitigation measures that need to be implemented to ensure that bats can continue to forage and commute around the developed Site.

In summary, sufficient bat survey has been undertaken to inform a reliable assessment of bat use of the Site and has enabled the development of a meaningful mitigation strategy based on new habitat creation and the provision of a bat friendly lighting strategy that ensures that the new habitats around the site will be kept in the dark for the benefit of bats and other nocturnal wildlife.

Habitats

We acknowledge that the Site supports a varied grassland sward and includes areas of quite species-rich semi-improved grassland that is typical of recently established and disturbed grasslands that have developed on clay-rich soils. However, none of the four plant species considered “*interesting*”, namely meadow barley *Hordeum secalinum*, grass vetchling *Lathyrus nissolia*, corky-fruited water-dropwort *Oenanthe pimpinelloides* or pyramidal orchid *Anacamptis*



pyramidalis, are Nationally Rare or Nationally Scarce species, and all are assessed as being of Least Concern according to the Vascular Plant Red Lists for the UK and England.

Furthermore, none of the four listed species are listed by the Hampshire Rare Plant Register as being rare or scarce in South Hampshire. Corky-fruited water-dropwort is listed as scarce plant in North Hampshire, but is not ranked for South Hampshire where it is considered “... *widespread and often abundant plant of many kinds of grassland but avoiding the driest and most acid substrates, and also the chalk ... It can sometimes appear abundantly on roadside verges after road construction or realignment and appears to be spreading in recent years in some areas.*” Meadow barley is not listed by the Register but is included as a species requiring further consideration in North Hampshire only.

In summary, none of the plant species recorded were uncommon or threatened Nationally or Locally, and the loss of this habitat requires no specific mitigation or compensation from a legislative perspective.

We believe that the new landscape scheme, which includes new wildflower meadow creation, will ensure that a similar range of habitats will be maintained around the periphery of the development, and there will be no loss of habitat diversity. We do acknowledge, however, that there will be a loss of the total area of semi-natural habitats present as an inevitable consequence of the new building and associated hard infrastructure.

Applied Ecology Ltd

23 April 2021





Harts Farm Way, Havant

Hazel dormouse survey

- Site boundary
- dormouse tubes

Figure 1

Map Scale @ A4: 1:2,500

Surveyed by: RD

Survey date: July–Sept 2020

Drawn by: RD

Checked by: DP

Status: Final

