

Hi Both,

My apologies for the delay, I have received an email regarding this application which I thought I had responded to earlier in the week, I must not have sent it properly. Here are my comments:

APP/19/00083 - 77 Havant Road, Hayling Island, PO11 0PT - Proposed new vehicular access for use by tractors and goods vehicles

Thank you for your consultation for the proposed access for farmland vehicles along the A3023, the application is supported by Preliminary Ecological Appraisal by Jenny Bennett Ecology (June 2020).

It is understood that the field containing the site was recently stripped of vegetation. While it is recognised that cutting of the field may be a regular part of agricultural operations, in the context of development, there has been a net loss of habitat. Based on aerial imagery, the field appears to have supported some well-established tall ruderal vegetation which was one of the few less managed areas of habitat in the vicinity.

The National Planning Policy Framework (NPPF, 2019) encourages measures that minimise 'impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF, 170, (D)). The 'environmental' dimension of sustainable development – the central tenet of the NPPF – is afforded equal emphasis to the 'economic' and 'social' dimensions. In addition to the NPPF, Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.

I would therefore ask that in addition to the enhancement measures made in the ecological report to plant the gaps of linear features with trees, compensation measures for the loss of vegetation are also implemented. I would suggest the most appropriate measure, in this case to contribute to biodiversity, would be for the applicant to restore an area of bare ground of at least 500m² to grassland habitat. This can be achieved by, seeding the ground with an emorsgate grassland mix and managing the grassland as a tussocky semi improved grassland. Information on meadow management can be found here; <https://wildseed.co.uk/page/management-of-meadows-and-grassland>.

The ecology report has made recommendations to retain and protect the mature trees and scrub habitats close to the works, and that there shall be no proposed lighting to avoid impacts to foraging and commuting bats.

Provided that these measures are implemented, I would have no concerns over these proposals. If you were minded to grant permission, I would simply suggest that the following condition be added to the decision notice:

Condition:

Development shall proceed in accordance with the measures set out in Section 4 of the Preliminary Ecological Appraisal by Jenny Bennett Ecology (June 2020). In addition, compensation for the loss of established tall ruderal grassland shall include the restoration of grassland habitat of at least 500m² within the area of bare ground. **Reason;** *In accordance with DM8 Conservation, Protection and Enhancement of Existing Natural Features of the Havant Borough Local Plan.*

Please do contact me if you need any further information.

Kind Regards

Rebecca Harvey

Ecologist

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