

Houghton, Michelle

From: Jones, Rachel <Rachel.Jones2@naturalengland.org.uk>
Sent: 05 June 2019 13:03
To: Oliver, Lewis
Subject: APP/19/00374

FAO – Lewis Oliver

Your ref –APP/19/00374 | To create a Habitat Mitigation Zone for Brent Geese and Solent Waders (linked to the current planning application APP/18/00450). | Forty Acres, Havant Road, Havant, PO9 3LW
Our ref – 281969

Dear Lewis,

Thank you for consulting Natural England on the above application.

Further information requested

As you are aware, Natural England has provided comments in relation to the linked application APP/18/00450 which included provision of a permanent bird conservation area. Natural England welcomed this proposal. However, further information was requested with regard to the design and management of the bird conservation area to ensure its effectiveness.

With regard to this separate application, Natural England requests further information and clarification on the following issues:

- The area proposed for the Habitat Mitigation Zone differs from the area outlined in APP/18/00450 and subsequent discussions with the applicant's ecologist who stated that the bird conservation area would also extend further to the south of the area set out in APP/18/00450. Our understanding was that the whole of the eastern section of the site would form part of the bird conservation area. Further information is requested to explain why a different area has been submitted for this application and how this relates to the area outlined in the linked application. It is Natural England's preference that the Habitat Mitigation Zone incorporates the whole of the proposed bird conservation area (the eastern area of the site) to allow this refuge to establish appropriately in advance of the linked application.
- Given that this application is in advance of the wider linked application, which has not yet been approved. Natural England recommends that no tree loss is undertaken within the Habitat Mitigation Zone at this stage. Records of brent geese have been recorded at the site with the trees in place and it is our view that the provision of suitable habitat, without disturbance, is the key requirement at the stage. Future management can review the conditions of the site and the impact of the trees at a later date, if it is felt that this is impacting the capacity of the bird conservation area. Although wider biodiversity enhancements are included within the linked application, this has not yet been approved and the timing is unclear. We therefore strongly advise that this loss to biodiversity is prevented at this stage.
- Further information is requested with respect to the need for land raising and import of soil to this area. It is not clear why the habitat mitigation zone needs to meet site levels for residential development, as detailed in the WYG Ecology Report.

- It is Natural England's view that sustainable systems are required for the management of bird conservation areas. It is our view that the existing nitrogen content of the soils will be sufficient to create improved grassland and we advise that this management approach is adopted, without the addition of any fertiliser. There will be nitrogen inputs onto this land from the birds themselves, additional inputs if the land is grazed during the summer and from atmospheric deposition. This site is in close proximity of the designated sites and Natural England is concerned about the impacts from nutrient run-off from fertilisers.
- Further information is requested on the proposed management of the Habitat Mitigation Zone / bird conservation area and measures to ensure its effectiveness. For example, no details have been provided as to whether this area will be fenced to limit access. We recommend that the application is supported by a costed long term management and monitoring plan that sets out how this land will be managed and by whom.
- Natural England advises that biodiversity mitigation measures are agreed with your retained ecologist and secured with any planning permission.

Please let me know if you need any further details.

Kind regards
Rachel

Rachel Jones
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