

APP/18/01033 | Residential development comprising 69 No. dwellings with access from St George's Avenue together with access, car parking, landscaping, electrical substation and associated works. | Land East of, Castle Avenue, Havant 18.2218

Thank you for consulting me on this application. Please accept my apologies for the delay in responding to you.

The application is accompanied by an Ecological Assessment (ECOSA, October 2018). The application site comprises a narrow area of improved grassland and boundary hedgerows adjacent to existing residential housing, a railway line, a larger improved grassland field and the A27. A suite of ecological surveys have been carried out.

The application site is listed within the Solent Waders & Brent Goose Strategy (SWBGS) as Site H19. The current iteration of the SWBGS describes the site as 'low use', meaning that the site has 'records of (SPA) birds but in low numbers'. In the case of H19 there is an older (2011) of 13 curlew and no records of brent geese. The application site comprises the extreme western end of the larger H19. Whilst H19 is of low use for SPA birds, it nevertheless has potential to support wintering birds and the (partial) loss of SPA supporting habitat will need to be mitigated.

On-site mitigation is essentially impossible (in terms of alternative open space for recreation) due to the relatively small size of the site and the lack of on-site opportunities for greenspace. The recently-published Solent Waders and Brent Goose Strategy Guidance on Mitigation and Off-setting Requirements provides a framework for mitigation options for impacts to SWBGS sites, essentially requiring per-hectare financial contributions towards off-site mitigation measures designed to protect and enhance the wider SWBGS network of sites. There is a discussion to be had with respect to this framework and this application site: there is provision for the reclassification of SWBGS sites where it can be demonstrated (through analysis of existing data and applicant-led field assessments) that part of a wider SWBGS site is extremely unlikely to form suitable habitat for SPA bird species. There are a small number of sites which contain habitat that is clearly unsuitable (e.g. is either built-up, is highly-constrained or contains buildings/hardstanding) and there is a case to be made that some SWBGS site boundaries require amending. H19 would likely fall into this category, with the narrow western sliver (this application site) bordered by hedgerows and highly unlikely to be attractive to birds (due to its narrow dimensions and restricted field of views). The use of individual sites by SPA bird species will vary over time and it cannot be assumed that H19 will remain a 'low use' site into the future. Low use sites contribute to the overall SWBGS network and their protection in the long-term is an objective of the current SWBGS.

It is recognised that there is a case to be made for the possible reclassification of H19 (or at least a boundary amendment) and the views of Natural England will be important. Should it be agreed that this parcel of H19 is not sufficiently important to trigger mitigation payments there will still be a need for on-site mitigation in order that impacts to the bulk of H19 are avoided. Recommended measures here include the retention and strengthening of the eastern boundary hedgerow. I would support such

measures but insist that they are robust and that there is provision from the applicant for ongoing, long-term monitoring and maintenance. I would also add that construction-phase impacts could occur and that, if potentially-disturbing works will occur during the overwintering period, mitigation measures such as screening will be needed. There is also potential for the proximity of new built development to deter the use of the eastern field in future. So, whilst recognising that full mitigation framework payments are likely not required, some further measures are necessary. I would suggest that once comments are received from Natural England (and other interested parties such as the Wildlife Trust and the RSPB) there is a clarification of proposed mitigation measures for H19.

In terms of other ecological constraints, the site has been shown to support at least six species of foraging/commuting bat including the uncommon western barbastelle. None of the trees within the site is considered to offer potential for supporting tree-roosting bats. The foraging/commuting bat assemblage is typical for a south Hampshire site within a relatively suburban context, although the occasional presence of barbastelle is noteworthy. Hazel dormice and great crested newt are considered to be absent and I would concur with this. The site supports a small population of slow-worms. Most of these ecological constraints can be managed within the site through the use of habitat retention and buffering and a sensitive lighting strategy. There is a need for off-site reptile mitigation: details of any off-site receptor will need to be provided prior to determination.

If you have any queries please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

**Senior Ecologist
Ecology Team**