

Date: 27 February 2019
Our ref: 272286
Your ref: APP/19/00007



Mr David Eaves, Havant Borough Council

BY EMAIL ONLY

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Dear David

Planning consultation: APP/19/00007 Outline Application for access with all other matters reserved, for up to 72 new homes plus associated green infrastructure including community orchard
Location: Camp Field (land to the west of Havant Crematorium), Bartons Road, Havant

Thank you for your consultation on the above dated 31 January 2019 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

As submitted, the application could have potential significant effects on Chichester and Langstone Harbours Special Protection Area and the Solent Maritime Special Area of Conservation. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

- Confirmation of the nutrient budget for the development
- A Biodiversity Mitigation and Enhancement Plan (BMEP), or equivalent, that has been agreed by a Hampshire County Council (HCC) Ecologist prior to determination.

Please re-consult Natural England once this information has been obtained.
Natural England's advice on other issues is set out below.

Additional Information required

Impact of nutrients on the designated sites

There is existing evidence of high levels of nitrogen and phosphorus in the water environment with evidence of eutrophication at some designated sites. An Integrated Water Management Study for South Hampshire was commissioned by the Partnership for Urban South Hampshire (PUSH) Authorities to examine the delivery of development growth in relation to legislative and government

policy requirements for designated sites and wider biodiversity. This work has identified that there is uncertainty as to whether housing development would require mitigation.

In light of this uncertainty, Natural England recommends that the proposals achieve nutrient neutrality. A working methodology has been attached for your information. Natural England would be happy to advise further as part of our [Discretionary Advice Service](#).

Biodiversity and Protected Species

Natural England does not hold locally specific information relating to protected species, local or national biodiversity priority habitats and species, local sites (biodiversity and geodiversity) and local landscape character. These remain material considerations in the determination of this planning application and we recommend that you seek further information from the [Hampshire Biodiversity Information Centre](#) and other appropriate bodies. In some instances, further surveys may be necessary through an ecological appraisal to be agreed by an HCC ecologist.

Natural England has published Standing Advice on protected species. Please note Standing Advice is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation. If you have any specific questions not covered by our Standing Advice, or have difficulty in applying it to this application please contact us at consultations@naturalengland.org.uk.

Natural England welcomes the submitted Biodiversity Mitigation and Enhancement Plan. In order for your authority to be assured that the proposal meets the requirements of the standing advice and the additional requirements for biodiversity enhancement and net gain as set out in National Planning Policy Framework paragraphs 8, 118, 170, 174 and 175d, Natural England recommends that the Biodiversity Mitigation and Enhancement Plan (BMEP), or equivalent, is agreed with a Hampshire County Council (HCC) Ecologist prior to determination.

It is noted that the surveys identified a high diversity of bats at the site. Whilst Bechstein's bat was not recorded in this survey, the presence of Bechstein's bat is established within the adjacent ancient woodland. Appropriate mitigation and enhancements are required to ensure there are no residual effects on bats and net biodiversity is achieved. It is therefore essential that the proposals include appropriate buffers to woodlands, trees, hedgerows and other light corridors in accordance with policy E15.

Natural England welcomes the proposed buffer to the ancient woodland and the proposal for bat boxes on site and within the development. However we strongly recommend that further consideration is given to maximising the width of the buffer and extending the buffer for enhanced ecological connectivity. Natural England encourages further multi-functional open space on the western and northern boundary of the site including woodland planting / natural regeneration to ensure there are no residual impacts on roosting and foraging bats and to further support and enhance the ancient woodland. Consideration should also be given to whether measures to prevent opportunities for informal access into the adjacent ancient woodland are required.

We recommend that consideration is given to other developments proposed in the locality, which are also impacting on the ancient Forest of Bere landscape, to ensure the biodiversity mitigation and enhancement measures are addressed strategically and ensure the continued ecological function of the area. Natural England recommends that opportunities to enhance the existing network are considered, for example through additional woodland planting or the provision of additional bat roost boxes within the adjacent ancient woodland to benefit and support the diversity of bat species present in the area including Bechstein's bats.

Natural England strongly recommends that a sensitive lighting strategy that meets best practice guidance is agreed with the County Ecologist. The agreed strategy should be secured and implemented with any planning permission to ensure there are no residual impacts on foraging and commuting bats and other wildlife.

The submission of an HCC approved BMEP will help ensure your authority meets the requirements of Section 40 of the Natural Environment and Rural Communities Act (2006), which 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'. Biodiversity 2020: A strategy for England's wildlife and ecosystem services and Making Space for Nature (2010) also provide strong drivers for the inclusion of biodiversity enhancements through the planning process.

Please note that provided the Hampshire County Council Ecologist is satisfied with the submitted biodiversity mitigation and enhancement measures and the measures are secured by any permission then no further consultation with Natural England on this aspect of the proposal is required.

Other Advice

Bird Aware Solent / Solent Recreation Mitigation Strategy

Natural England is aware that Havant Borough Council has adopted a planning policy to mitigate against the adverse effects from in-combination recreational disturbance on the Solent SPA sites, as agreed by the Solent Recreation Mitigation Partnership (SRMP) Definitive Strategy. Provided that the applicant is complying with this policy and an appropriate planning condition or obligation is attached to any planning permission to secure the contributions towards this mitigation measure, Natural England is satisfied that the applicant has mitigated against the potential adverse effects of recreational disturbance on the integrity of the European site(s).

Construction Environmental Management Plan

We advise that a Construction Environmental Management Plan (CEMP) should be submitted to and approved in writing by the Local Planning Authority as a condition of any planning permission. This should identify the steps and procedures that will avoid or mitigate impacts on the ecological interests and sensitivities at the site. The CEMP shall ensure best working practices are maintained during the construction phase. The CEMP should address the following impacts:

- ☐ Storage of construction materials/chemicals and equipment
- ☐ Dust suppression
- ☐ Chemical and/or fuel run-off from construction into nearby watercourse(s)
- ☐ Waste disposal
- ☐ Noise/visual/vibrational impacts on bats
- ☐ Lighting impacts on bats.

The approved CEMP should be secured via an appropriately worded condition attached to any planning consent and shall be adhered to at all times, unless otherwise first agreed in writing with the Local Planning Authority.

Water resources

Natural England encourages all new development to adopt the higher standard of water efficiency under the Building Regulations (which equates to 110 litres /head/day including external water use) and re-use in line with best practice. Consideration should be given to the use of grey water recycling systems and efficient appliances.

Further general advice on the protected species and other natural environment issues is provided at Annex A.

If you have any queries relating to the advice in this letter please contact me on 07717808691.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our [Discretionary Advice Service](#).

Please consult us again once the information requested above, has been provided.

Yours sincerely

Rachel Jones
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Dorset, Hampshire and Isle of Wight Team