

Houghton, Michelle

From: Norton, Tristan <Tristan.Norton@hants.gov.uk>
Sent: 14 March 2019 11:31
To: Oliver, Lewis
Cc: Havant Planning and Development Mailbox New
Subject: APP/18/01033 Land East of, Castle Avenue, Havant 19.0445

Dear Lewis,

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 19.0445

Thank you for consulting me on this application.

The application is accompanied by an amended Ecological Assessment (ECOSA, February 2019). 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. The applicant is proposing that the loss of part of the H19 Low Use site is compensated by the payment of a 50% contribution (equating to c.£39,000).

The views of Natural England are critical on this matter. Given the ambiguities surrounding the records of SPA birds within site H19 I would suggest that the compensatory proposal is an acceptable approach in this circumstance. The funds provided for the loss of an area of Low Use supporting habitat would assist in the overall protection of the wider network – I am aware that Havant Borough Council is in the process of identifying areas where compensatory funds can be best directed in order to protect and enhance the network.

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. To date, no indication of site lighting has been provided and so it is not possible to conclude that this will not be an issue.

I would query why there is a significant gap in the eastern boundary hedgerow adjacent to plot 36 (see dwg PERSC22164 11B Sheet 3 of 3). This does not accord with the statement in the ecology report that where gaps are present these will be bolstered to provide a closed visual screen. The acceptability of the development is in part dependent upon there being minimal impacts on the adjacent SWBGS site H19. Clarification is required on this matter.

An off-site reptile receptor site has been identified, at Cranleigh Road, Portchester. Whilst moving protected species outside the Borough would normally be seen as undesirable, it is acknowledged that the application site supports minimal areas of suitable reptile habitat and the on-site population is likely to be limited. In this instance I am willing to accept that the proposed off-site, out-of-Borough receptor site offers a suitable option.

In accordance with emerging Local Plan policy and Havant's Biodiversity Strategy I would strongly recommend that further ecological enhancements are sought within the built area. For example, there is no reason why a proportion of new dwellings should not incorporate built-in enhancement features such as cavity bat roosting units and bird nest boxes (especially for common swift, house martin and house sparrow). I would also request that the recommendations within the ecology report are strengthened to include concrete measures rather than 'possibles'. Indicative locations for ecological features should be shown on a site layout plan/soft landscaping plan.

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

Kind regards,

Tristan

Tristan Norton

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