

Dear Daphney,

APP/18/00224 | Approval of Reserved Matters in respect to Phase 1 Plot 3a of APP/15/00732 (new employment uses, hotel and access road) comprising construction of B2 commercial vehicle repair and maintenance facility with ancillary sales area (total 1,190 sqm) for plot access, layout, scale & appearance and Condition B5 Other Matters criteria A to H inclusive. | Dunsbury Park, Fitzwygram Way, Havant, PO9 4EE 18.0497

Thank you for consulting me on this application for the development of Plot 3a of the Dunsbury Park site. There are a number of areas where I consider that clarification is required.

The application is accompanied by an Ecological Impact Assessment (Atkins, February 2018), a 2017 Dormouse Survey Results report (Atkins, February 2018) and a Bat Survey and Report (Sylvatica Ecology, December 2017).

Habitats

The bulk of the application plot comprises former arable land which has been disturbed and partly recolonised by vegetation. No detailed description of the vegetation has been provided – the LPA should expect full details of any survey information. For example, the presence of ‘arable weeds’ may indicate that species of conservation importance may occur. I appreciate that there may have been constraints to access but it is important that attempts are made to describe in detail the vegetation present. This should be noted for future applications.

The plot is bordered to the west by Cherry Tree Row SINC, an area of semi-natural woodland. The EIA report states that a buffer will be established between the woodland and the application site. The site sections show a 2.4m wooden acoustic fence on the eastern site boundary. It is not immediately clear what the distance is between this fence and the woodland (but my estimate is no more than 3m to the tree canopy?), or whether there will be any incursion into the woodland edge. The building is 7m high so it is not clear how the 2.4m fence would assist with mitigating any light spillage (which would be most relevant at canopy level). Some clarification on this matter would be welcome. An arboricultural impact assessment report would be useful.

I note that many of the residual ecological mitigation/compensation measures rely on the use of the proposed Habitat Creation Area to the north. This area has, I understand, not yet been created. There is a risk of this area not being ready within a suitable timeframe for it to adequately mitigate the impacts associated with plots as they come forward. I would appreciate some clarification as to when exactly the area will be in suitable condition (it is currently described as containing construction spoil) to be of use in mitigating ongoing impacts. It would be useful to have a ‘running tally’ of which impacts on each plot are being mitigated using the Habitat Creation Area. Are we currently running a mitigation deficit?

Bats

The very rare Bechstein’s bat has been recorded within very close proximity to this site (breeding age female trapped just south of the site in 2015) and is known to be

present in large numbers (of at least national significance) in the surrounding landscape. It is imperative that bat surveys in this landscape use methods which are best placed to detect this species. Current best practice survey guidance recommends that the only reliable method for detecting Bechstein's bat is to use trapping methods. The species echolocates extremely quietly and is highly likely to be missed by standard bat detector surveys. The use of walked transects and automated detector surveys here (and only carried out from mid-summer to early-autumn, with some survey limitations) would be very unlikely to detect Bechstein's bats and, in any case, the surveys did record a small number of calls from mouse-eared (*Myotis* species) bats which have not been identified to species level. There are at least six mouse-eared bat species present in Hampshire and the calls recorded here could be any of those. The LPA should expect at least some attempt to identify mouse-eared bats to species level, especially where Bechstein's is present. I am not sure I agree with the statement that '*data obtained is considered to provide sufficient information as to the species present and how there [sic] are continuing to use the Application Site*'.

The uncommon but widespread western barbastelle has also been recorded on site, highlighting the suitability of this area for a diverse assemblage of bat species.

In future, the LPA should expect a more nuanced approach to surveys intended to detect Bechstein's bats. I would suggest that trapping locations along potential flying routes (hedgerows, woodland rides) would be a more efficient method of detecting this species and would also assist in detecting other quiet species such as long-eared bats which are routinely under recorded. The presence of features used by flying Bechstein's bats would substantially increase the value of those features and have implications for the mitigation measures required across the wider site (remembering that since the outline permission was granted our understanding of this species in south-east Hampshire has developed substantially). For this individual proposal the impacts to boundary features are relatively limited (but see comments on lighting below) and I am content to state that I do not expect additional surveys to be carried out. Rather, I am again reiterating that where Bechstein's bat is known to occur, standard survey methodologies are not likely to provide the information required to robustly understand the potential constraints. Future applications must be informed by appropriate survey design and results interpretation.

No detail is provided on lighting, beyond some broad recommendations. Given the potential for lighting at this site (and other plots) to result in demonstrable impacts to the bat assemblage present, the LPA should expect firm details of lighting specifications in order that the potential impact can be explicitly understood. Lighting units attached to the building or on tall columns would presumably have the potential to result in spillage onto boundary vegetation. The 2.4m high fence would be unlikely to mitigate any lights on the upper sections of the building, even if luminaires are full cut-off. Clarification is required.

Dormice

Updating surveys were carried out in 2017. No dormice were recorded but it is assumed that any dense woody vegetation supports this species. Given what we know about the distribution of this species in Hampshire I consider this to be a sensible approach.

Reptiles

No updating surveys were carried out in 2017 due to access issues. The proposals will entail impacts to reptile habitat. It is unclear what is to happen to any reptiles encountered during site clearance works. Supervised clearance methods are recommended, but what happens if substantial reptile numbers are encountered? Will these animals be captured and moved? Where to? How will retained habitat be protected? Clarification is required.

Landscaping

Whilst the inclusion of some areas of wildflower grassland is welcomed, the use of beds of daffodils seems a little uninspiring. There are a range of native or more interesting bulb species which could be used to provide a more relevant landscaping scheme.

In summary, there are a number of areas where some clarification is required. This is mostly due to lack of clarity on precise impacts and subsequent mitigation details. Each new plot application needs to be explicitly linked to the wider mitigation strategy for the entire site.

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

Kind regards,

Tristan

Tristan Norton

**Senior Ecologist
Ecology Team**

Specialist Environment Services
Economy, Transport and Environment Department
Hampshire County Council
Elizabeth II Court West
The Castle, Winchester
Hampshire SO23 8UD
Direct Line: 01962 832335
E-mail: tristan.norton@hants.gov.uk; www.hants.gov.uk/biodiversity