

Comments from Tristan Norton to Daphney Hayward – Principle Planner, with regard to Plot 3A Planning Application.

Please find below response to comments in red from C. Phillips Atkins Ecologist.

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. **Noted.**

Ecologist agrees that more information would be desirable as for the first development plot (Plot 2) a full species list was obtained for the purposes of BREEAM prior to any construction works. However, BREEAM for Ecology is not being sought for subsequent plots so only dominant species have been noted during the Phase 1 survey. Arable weeds may have better been described as ruderal weeds such as dock and thistle. Due to proximity and the same land use it is expected that the species composition of Plot 3 would be similar to Plot 2.

The plot is bordered to the west by Cherry Tree Row SINC, an area of semi-natural woodland. The **E**cIA 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. **The plot has now been marked out and there will be no incursion into the woodland trees for Plot 3A. The ecologist advised an arboricultural assessment to be undertaken to advise of RPZs and the limits of the construction footprint. Gristwood and Toms have now completed this. No trees are within the development area but the**

RPZ detail is being added to the proposed development layout. It states that trees are of limited value and an unnecessary constraint to the development. Potentially some pruning of overhanging canopy is advised (this is more relevant to Plot 3B) to prevent future encroachment and enable construction access. Ecologist has responded to this to advise that the woodland strips provide habitat for EPS bats and dormice that any works will be discussed and agreed with an ecologist first with regard to bats/ birds and dormice.

Ecologist agrees that the acoustic fence will not be as effective to prevent light pollution as it is on Plot 2 which is a raised plot. No acoustic fence is required on Plot 3b.

It was discussed with the Portsmouth Project Manager Kevin Hudson that a PCC owned field on the other side of Cherry Tree Row could be used to plant buffer planting to create a tiered woodland edge. Ecologist to follow this up and the area can be added to the Landscape Master Plan.

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? The habitat area had been started after the link road construction and reptile hibernaculum and the scrapes were completed however further work using excess spoil is required to create desirable grassland habitat.

Originally this was proposed to be landscaped and completed by this spring but has been delayed due to weather and constraints to haulage routes such as unidentified pipes. The progress is still hindered by the wet nature of the Site. A buffer of 15 m has been left around the field to retain some edge habitat for foraging reptiles/ birds/ small mammals/ bats and access for other wildlife at the Site as well as protect the woodland and hedgerows from traffic and potential silt run off.

Ecologist agrees that the area must be functional as soon as possible and will talk to the contractor regarding this with the aim to get landscaping and planting done at appropriate times this year.

Ecologist will also create a tally of impacts being mitigated and if necessary identify other areas that could be used/ enhanced within the PCC owned land.

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.

Information collected for Plot 2 indicated the features being used by Bechsteins bats. The mitigation strategy for Plot 2 in terms of lighting, implemented for the ecological receptors is the same for Plot 3 and will be implemented across the Site. The survey report by Ian Davidson Watts in Cherry Tree Row and Beech Wood East recommended further mist netting surveys to be carried out to the north of the Dunsbury Park Site. This will take place and can further inform the presence of Bechstein's within the wider site and therefore further site wide mitigation.

Some site wide mitigation is already being applied at design stage based on previous survey results with hedgerows used for commuting being retained but also a wide buffer being left adjacent to Beech Wood East with a bund to be planted in order to create a dark corridor adjacent to the woodland.

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.

Noted Further Response – TN: A Lighting Statement and Plan have been submitted. Levels are generally in the acceptable range (0-2 lux) along the most sensitive boundaries although with a few exceptions (e.g. at SW corner of 3a where 5 lux intrudes onto the retained Cherry Tree Row SINC. The luminaires are mostly tall pole-mounted types and use LED lamps with warmer colours. This should also assist in mitigating the negative impacts of lighting on nocturnal organisms. I do think that the issue of lighting across the entire development site needs monitoring and, if there are persistent issues with unacceptable spillage, additional mitigation measures will need to be considered e.g. supplementary plantings, hooding to luminaires.

Comments on the lighting plan are acknowledged and agree that lighting should be monitored across the Site. I have stipulated in the EclA for Plot 3, and will do for subsequent EclAs, that Plot tenants are not to install additional security lighting which does not comply with the lighting plan.

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. (Noted)

Where dormice were recorded north of the link road a dormouse licence will be applied for for any impacts to Hedge 3 (which cuts through the Site between Plots 4 and 5). Monitoring under the Link Road and Plot 2 licence is continuing.

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.

Site preparation and levelling has now occurred under another reserved matter permission. Reptiles emerging from hibernation are likely to be present within woodland field/ edge habitat which is protected from site machinery by heras fencing. There is adjacent habitat to migrate to especially grassland to the south of the plot. Some edge vegetation clearance has happened under PMW for reptiles and dormice in early April. Neither were found during the works. If any reptiles are found in low numbers during any subsequent work such as maintenance of scrub vegetation, they will be relocated to the northern end of the habitat creation area (adders) or likely to the southern area of grassland SINC if slow worms or grass snake.

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.

Ecologist to discuss with Landscape architects regarding a more diverse flower planting mix. This area is located above a large gas main so minimal maintenance and disturbance is required in this location.

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 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**