



CGO Ecology Ltd 27a Ridgefield Gardens Christchurch Dorset BH23 4QG UK

Ecological Mitigation, Compensation and Enhancement Plan for construction of a facilities block at Hayling Golf Links, Hayling Island, Hampshire

CGO Ecology Ltd
Christchurch

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Authors:

Adam Day ACIEEM, Senior Ecologist
Dr Chris Gleed-Owen MCIEEM, Director & Principal Ecologist

CGO Ecology Ltd
27a Ridgefield Gardens
Christchurch
Dorset BH23 4QG

For client:

Hayling Golf Club
Links Lane
Hayling Island
Hampshire PO11 0BX

(+44) 01202 798126
(+44) 07846 137346
enquiries@cgoecology.com
www.cgoecology.com

*Registered Company in England and Wales, number 6532052
Registered office: Suite 8 Bourne Gate, 25 Bourne Valley Road, Poole, Dorset, BH12 1DY, UK*

1. Introduction

This Ecological Mitigation, Compensation and Enhancement Plan (EMCEP), has been prepared on behalf of Hayling Golf Club Ltd, in relation to condition 6 of planning consent for application APP/17/00275, from Havant Borough Council:

“Prior to the commencement of the development hereby approved an ecological mitigation, compensation and enhancement plan shall be submitted for approval to the Local Planning Authority. The plan shall include details of all measures (methods, timings) to protect ecological features and measures to compensate and enhance the site post-development. Development shall then proceed in strict accordance with the approved plan.

Reason: To protect biodiversity having due regard to policies CS11 and DM8 of the Havant Borough Local Plan 2011 and in accordance with the Conservation Regulations 2010, Wildlife & Countryside Act 1981, the NERC Act (2006) and the National Planning Policy Framework.”

For context, this document should be read in conjunction with the Preliminary Ecological Appraisal (PEA) (Extended Phase 1 Habitat Survey) report submitted as part of the planning application by CGO Ecology (Gleed-Owen, 2016). All the recommendations made for ecological mitigation, compensation and enhancements in this EMCEP relate to the findings and recommendations made in the PEA.

The habitat restoration methods recommended below also discharge condition 5 of the planning consent:

“Prior to the commencement of the development, a detailed methodology shall be submitted setting out the materials to be used in the construction of replacement habitat over the facilities building. Materials should be appropriate to the existing substrates and sourced locally from appropriate sources.

Reason: To ensure appropriate mitigation works in the interests of the ecology of the SSSI having due regard to policies CS11 and DM8 of the Havant Borough Local Plan 2011 and the National Planning Policy Framework.”

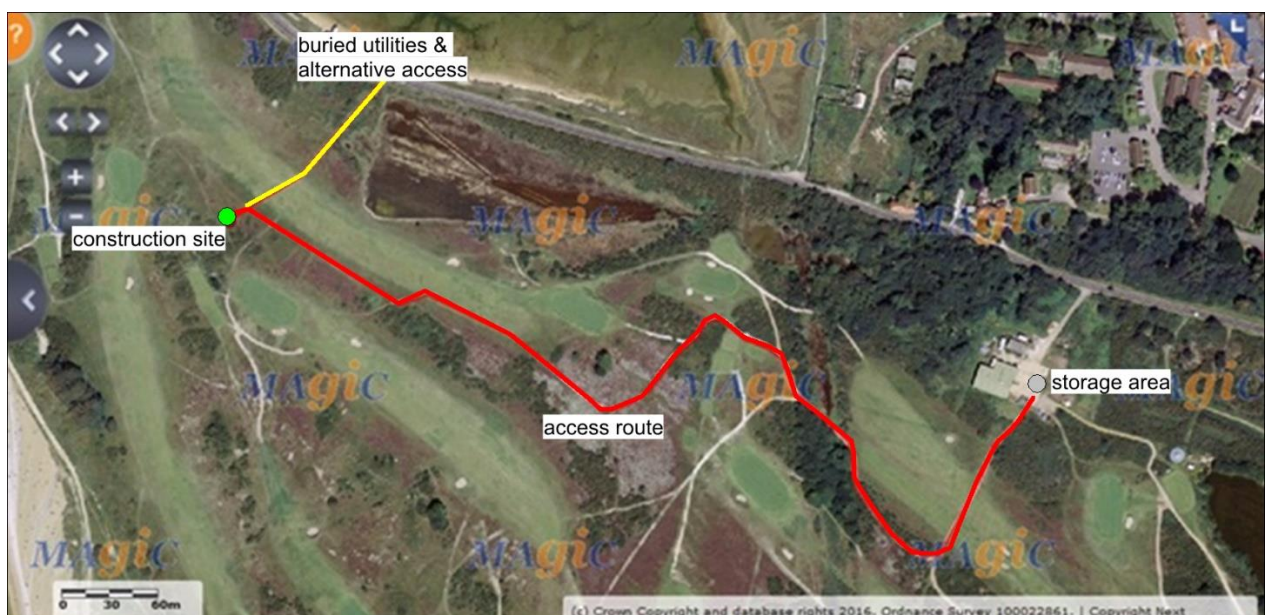


Figure 1 – Construction site, proposed access routes, buried utilities and storage areas for new facilities block at Hayling Golf Links.

2. Habitats

The location of the proposed works is within an area of dune scrub and dune grassland habitat. A small area of these habitats within the footprint of the new halfway facilities will be lost to the groundworks of the building process. Both these habitat types form part of the overall surrounding maritime habitats for which the Sinah Common SSSI (Site of Special Scientific Interest) is designated.

In addition, an existing access track will be used to access the site and will have new hardcore laid to improve its usability. A new utilities route for the block is also proposed, running away north from the block towards Ferry Road, through similar type habitats. There are no trees within the proposed works area.

Mitigation

All mitigation for the proposed works relates to habitats immediately surrounding the works footprint including the block itself, access track and utilities route. These are the areas most likely to be impacted by the construction process. With that in mind, the following is proposed:

- An exclusion zone will be placed around the footprint of the proposed works. This will be clearly marked with either high visibility rope or tape and will be maintained throughout the whole of the construction process. No vehicle will operate outside of the exclusion zone, at any point during the construction phase.
- Any overnight vehicle compound or materials storage area will be away from habitats of value. If this is required near to the proposed works footprint, then it will form part of the initially agreed works area and be inside the exclusion zone. Stored materials such as soils will not be placed in new areas of dune grassland or scrub.
- The access track running to the proposed works area will have an exclusion rope/tape placed immediately along each side of it, for the entirety of its length. The aim of this is to prevent incursion of heavy and tracked vehicles into the habitats immediately adjacent to the track. The exclusion zone will be maintained throughout the entire construction phase.
- The proposed new utilities route will be installed utilising micro-siting. Small scale machinery and hand tools will be used along the route. A works area width of maximum 3m will be used along the length of the route, and marked with exclusion rope/tape on each side.
- The utilities will be installed by temporarily lifting the turf and replacing it as the sections of cable and or pipe are laid. If it is required to dig out soil, then this will be placed on sheeting and filled back in immediately behind the progress of works. No piles of soil or works materials will be left on adjacent habitats overnight.
- Some of the habitats within the proposed works areas have been managed for protected species mitigation since September 2016. This has included removing gorse and maintaining grassland at a short length. This will continue within the proposed works areas throughout the construction phase however, will be limited to areas within the proposed exclusion zones and will not exceed them.
- Upon completion of the new build, new access footways may be required. Increased footfall will be anticipated, which may lead to increased erosion of sensitive habitats and disturbance to other protected species. New pathways will be linked from existing paths where possible. If new materials are required, they will be imported from a local source to maintain the current substrate conditions. Alternatively, durable rubber matting can be used as a long-term solution. Each side of the pathway will be excluded from the surrounding habitat by path marking ropes, to prevent increased footfall in habitats adjacent to the pathways. Clear signing also helps to decrease footfall away from the correct routes.

Compensation and enhancements

Compensation for the dune grassland and scrub habitats to be lost, was proposed as part of the planning application process. The new building has been designed sympathetically to give no net loss in the existing habitat. This has been achieved by integrating the building into the dune system and creating a green roof over the new build. The creation of these features will be carefully considered, to be consistent with surrounding habitats. Enhancements will be achieved by carefully managing these habitats in the future.

- The proposed works area will have all existing grassland cover removed as turfs, and stored and maintained by the Golf Club in a suitable location on site. Upon completion of the groundworks and new build, these will be used to re-vegetate the newly-created dunes, and to create the green roof. This will ensure that the area is re-vegetated as quickly as possible, using only materials that match the surrounding habitats. This will fulfil planning condition 5, to ensure that appropriate substrate is used to restore the site and building's roof.
- Any arisings from the footprint of the proposed works will be stored for future use. These can be used to create the new dune shape for surrounding the building and laid over the green roof to provide the same substrate as the surrounding habitats and a viable seed bank.
- Management of the area will be limited to the removal of scrub where dune grassland was the dominant habitat. This will prevent the loss of grassland to scrub encroachment. Bramble and gorse are the species likely to establish in the newly created dune and green roof areas and will be removed annually.
- No mowing, application of herbicide/pesticide, or other treatment shall be permitted on the facility block's green roof and surrounding areas, except that necessary for pedestrian access and normal golf play.

3. Bats

The habitats present at the proposed works location are likely to be used by bats for foraging and commuting. Although there will be no net loss of habitat from the project, some mitigation measures will be applied to avoid disturbance during works and upon completion.

- If construction works are to take place during the main bat activity season from April through to the end of August, then night time working will be avoided. In addition, any compound security lighting will be sensor-activated and not permanently lit.
- Once the building is completed, additional lighting will be sensitive, with down-lighters and post-lighting utilised where needed. Any security lighting will operate on a sensor, and not be permanently lit.
- The reinstatement of existing habitats, through vegetating new dunes and creating a green roof, will ensure that no additional compensation or enhancement measures with regards to bats are required.

4. Hedgehog

Recorded locally and likely to be present on-site, hedgehogs may be affected by the proposed works. They are likely to utilise the surrounding habitats for foraging and shelter.

- If any suitable hedgehog refugia, such as brash or log piles, is present within the works footprint prior to ground clearance, then this will be removed by hand whilst checking for hedgehogs. These will be carefully removed to suitable nearby vegetation if present. The same is true for any vegetation piles or stored building materials during the entirety of the construction process around the site area.

- The reinstatement of existing habitats, through vegetating new dunes and creating a green roof, will ensure that no additional compensation or enhancement measures with regards to hedgehog are required.

5. Birds

The on-site habitats are suitable for a range of vegetation- and ground-nesting bird species. This includes the proposed works footprint for the facilities block and the route of the new utilities links. Mitigation will be required to prevent disturbing nesting birds during the pre-construction and construction phases. With restoration, no net loss of nesting habitat will occur.

- Whilst scrub clearance in the proposed works area has been undertaken previously, other habitat management is required along the proposed utilities route, to ensure it is unsuitable for ground nesting birds prior to the commencement of works. It is recommended that all grassland is kept to a maximum height of 30mm in the footprint of the new block, and along the proposed cable route. This will prevent ground-nesting species such as skylark (*Alauda arvensis*) from nesting in these areas. The same is true for the development footprint, which has been mown short since September 2016, as advised by CGO Ecology.
- The normal timing restrictions on carrying out these works apply to the breeding bird season from March to September inclusive. However, because reptiles may also be present in the grassland, the earliest these works could begin would be April, when temperatures are sufficiently warm for reptiles to be active and disperse. It is therefore recommended that bird-scaring methods are employed in works footprint areas. These will be installed in January/February prior to bird territories becoming established. Standard methods include streamers placed on canes, windmills and bird-of-prey kites.
- Prior to any vegetation clearance or groundworks, a site visit by an Ecologist will be made, to ensure no nesting birds are present within the works area. If any active nests are present, then a 5m exclusion zone will be taped-off until any young have fully fledged. It will be noted that some ground-nesting bird species such as skylark have up to three broods per year, and may be faithful to breeding locations.
- The reinstatement of existing habitats, through vegetating new dunes and creating a green roof, will ensure that no additional compensation or enhancement measures with regards to bird species are required.

6. Amphibians

There are no historic records of great crested newt (*Triturus cristatus*), common toad (*Bufo bufo*) or the other native UK amphibian species within 2km of the site, and amphibians are likely to be absent from the area. Therefore, no mitigation is required for amphibian species during the proposed works.

7. Reptiles

All four widespread UK reptile species are recorded within 2km of the site and will be anticipated within the works footprint of the building, cable route and access track margins. There is potential for individuals to be killed and or injured by vehicles and people working in these areas, constituting an offence under the relevant legislation. Following restoration and green roofing, no residual loss of reptile habitat will have occurred.

- Management of footprint habitat that could be occupied by reptiles was undertaken in September 2016. This included scrub clearance and short strimming of grassland. This has been regularly maintained in 2017, including October 2017 when CGO Ecology undertook a monitoring visit.
- If the grass exceeds 30mm, then further and continued management will be required. Reptile species are most active from mid-March until mid-October, when temperatures are warm and allow them to bask. Outside of this period, they will be mostly inactive, hibernating underground or in grass tussocks and similar vegetation. For this reason, ground clearance works can only take place from April until September while reptiles are fully active, or outside this time when sward has been maintained very short (up to 30mm).
- Grass to be cut for service route installation will be strimmed by hand. The sward will initially be cut to 100mm, left for at least 24 hours, or until the first rain-free day with air temperature above 10°C. This is to allow reptiles to disperse safely. The route will then be cut again down to 30mm. This will then be maintained until ground clearance works can begin. Any suitable refugia within works areas, such as brash piles or discarded rubbish, will be removed by hand. Any reptiles will be allowed to disperse into neighbouring unstrimmed habitat.
- The reinstatement of existing habitats, through vegetating new dunes and creating a green roof, will ensure that no additional compensation or enhancement measures with regards to reptile species are required.

8. Invertebrates

Although rare and scarce invertebrate species are recorded nearby, as shown by the desktop data search (Gleed-Owen, 2016), the proposed works are unlikely to result in negative impacts on the local populations of these species. The creation of different grass swards heights, and a local mosaic of bare ground and vegetated patches, is favourable to a wide range of insects.

The re-instatement of existing habitats on-site will ensure there is no net loss of habitat for the invertebrate species present on site. The use of sensitive building materials such as timber for retaining walls will create additional invertebrate habitat once the building is complete.

9. Invasive species

The site is a strictly-protected SSSI, and it is essential to maintain its integrity by ensuring that no accidental import of invasive plants or animals occurs. Invasive plant species including Japanese knotweed (*Fallopia japonica*) and Russian vine (*Fallopia baldschuanica*) were identified within the Golf Club boundary during the PEA (Gleed-Owen, 2016), and other invasive species are known to be present in the local area.

- A Biosecurity Protocol will be posted on site compound fencing and offices.
- Toolbox talks will be given to all contractors, staff and site visitors, to educate about the risks of invasive species, and the ways to avoid accidental spread.
- Care will be taken when moving vegetation, turfs or substrate around site, so that it does not come into contact with invasive species.
- A 'check-clean-dry' policy will be used for equipment or vehicles that are transported from other parts of the site (or from off-site) where invasive plant species may occur.
- If any additional substrate is required for construction or landscaping works, it will come from an on-site location that does not contain any invasive plant species. This is important for the integrity of the SSSI. An Ecologist will be consulted if unsure.

- All construction materials will come from reputable suppliers, and from locations where invasive plant species are not present.
- All contractors and subcontractors will be reputable, and ideally experienced in working on SSSIs or other protected sites. A knowledge of biosecurity and invasive plant issues will be a pre-requisite during procurement.

10. Conclusions

The recommendations in this EMCEP document must be followed to ensure protection of the Sinah Common SSSI, and the favourable conservation status of protected species. These recommendations should be agreed in writing by Havant Borough Council, to fully discharge conditions 5 and 6 of the planning consent.

11. References

Gleed-Owen, C. (2016) *Preliminary Ecological Appraisal (Extended Phase 1 Habitat Survey) for new toilet facilities at Hayling Golf Links, Hayling Island, Hampshire*. CGO Ecology Ltd, Christchurch.