

APP/18/00109 | Erection of four dwellings with the associated vehicular and pedestrian access and landscaping and replacement culvert. | Land adj 15 Billett Avenue, Waterloooville, PO7 7SZ – HAL Ref: 18.0535

Thank you for consulting me on this application which is supported by a number of ecology reports. In summary, further information in relation to reptiles and the stream located in the north of the site is required. It is therefore my advice that permission should not be granted until sufficient information in relation to protected species and notable habitats is provided to ensure that sufficient measures are in place and any impacts arising as a result of the proposed development will be mitigated / compensated for as appropriate. My detailed comments are set out below:

Habitats

The Preliminary Ecological Appraisal by the Ecology Co-op (September 2016) states that the habitats present on site include woodland strips along the eastern and southern boundaries, semi-improved grassland, scrub and a species rich hedgerow. It is also understood that a culverted section of Hermitage Stream is located in the north of the site. Whilst it is acknowledged that the section of the river within the works footprint runs under the ground, assessment of the section of the stream which is not culverted and located adjacent to the site has not been carried out. Therefore, further information is required from the applicant's ecologist to assess the suitability of the stream for protected species and any potential impacts arising during the construction phase, as the culverted section of Hermitage Stream will be replaced as part of this scheme.

A large number of trees on site will be removed to facilitate the development, along with all areas of semi-improved grassland on site. The Landscape Plan by Martin Ralph Architects (Drawing no: 16A_071 010 Rev K, June 2017) indicates that a number of mature trees and native vegetation, along with a new hedge will be incorporated into the soft landscaping scheme; therefore I raise no major concerns.

Protected species

Badgers

The Badger Survey Report by the Ecology Co-op (June 2017) confirms that no evidence of the presence of badgers on site was recorded.

Bats

The Bat Activity and Tree Climbing survey report (Ecology Co-op, August 2017) states that the climbing survey of a number of trees was undertaken in May 2017. During the climbing survey, of the 9 trees identified with potential for roosting bats, 8 were downgraded to negligible potential. No bats were recorded emerging from the only tree with bat potential which will be retained as part of the proposals. Serotines, noctules, common and soprano bats were recorded using the site for foraging and commuting. The results of the survey work suggested that the southern and eastern boundaries of the site are mainly used by foraging bats. Sensible mitigation measures have been included in the report to minimise the impact of artificial lighting on foraging/commuting bats which I support. The mitigation measures include no-light-zones along the eastern boundary, compensatory planting and provision of bat boxes. Provided that these measures are incorporated into the scheme, I raise no

concerns and if you were minded to grant permission, I suggest the following condition in relation to bats to be added to the decision notice:

- Development shall proceed in accordance with the measures set out in Section 5 'DISCUSSION AND RECOMMENDATIONS' of the Bat Activity and Tree Climbing survey for bats by the Ecology Co-op (August 2017). Thereafter, the new bat roost features and enhancements shall be permanently maintained and retained in accordance with the approved details. Reason: to ensure the protection of bats and enhance biodiversity in accordance with Policy E18 'Protected Species' of the Draft Havant Borough Local Plan 2036.

Reptiles

The Reptile Presence/Absence Survey Report by the Ecology Co-op (May 2017) confirms that the site supports a low population of slow worms. The report then acknowledges that the current proposals do not allow for this population to be retained on site. The report then suggests three potential off-site receptor sites including a primary school, a golf course and an allotment within 4 miles of the site. The report also states that "*Contact with these sites will not be made until planning has been approved*". Unfortunately this is not acceptable as the location of an off-site receptor site would need to be secured prior to planning permission could be granted. This will provide the LPA with the necessary information required to ensure the reptile population will be protected and safeguarded as part of the proposed works.

A letter dated 8th January 2018 by the Ecology Co-op titled "*Reptile Receptor Survey at Staunton Receptor site*" states that Staunton Country Park has been identified as a potential reptile receptor site. Reptile surveys of the country park were carried out between 15th of September and 10th October 2017 and no reptiles were found. I have concerns in relation to the survey methodology which does not appear to follow best practice guidelines. Only 10 refugia were used which is an unusually low number of refugia to capture presence/absence of reptiles on a site, particularly a country park of such size. With the exception of the last survey visit, all the surveys were carried out between midday and 14:20 which is not a suitable time of day for surveys as these tend to be times when reptiles do not need to take shelter underneath refugia to warm up and therefore their detection would be very hard. The temperature during the survey visits have been consistently high, again making the detection of reptiles very difficult. Therefore, I do not consider the results of the reptile survey of the receptor site to be robust enough.

Furthermore, whilst in most cases, it is preferable for the receptor site not to support the species to be relocated, an assessment of the reasons for their absence should be carried out. This is in line with Natural England Technical Information Note TIN102. This will enable any habitat requirements which are not currently met within the receptor site to be incorporated to make the existing habitats more suitable.

As stated above, in order to ensure the suitability of an off-site receptor site, the LPA must be provided with sufficient information and therefore written third party agreement is required at this stage to confirm that the landowners are happy to

accept a reptile population within the country park. Therefore I would advise that you request the applicant to provide further information in relation to reptiles.

Please do not hesitate to contact me if you require any further information.

Kind regards,
Maral

Maral Miri (MSc, CEnv, MCIEEM)

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