

Tina,

APP/17/00529 - Godbey House, 380 Sea Front, Hayling Island

Thank you for consulting me on this application for the erection of 13 residential apartments, parking and landscaping following demolition of the existing building, which is supported by a Ecological Appraisal (Hampshire County Council, January 2015) and Bat Emergence/Re-entry Survey Report (EPR, July 2017).

The development will result in a net increase in residential dwellings within 5.6km of the Solent Special Protection Areas (SPAs). This distance defines the zone identified by recent research where new residents would be considered likely to visit these sites. The SPAs supports a range of bird species that are vulnerable to impacts arising from increases in recreational use of the sites that result from new housing development. While clearly one new dwelling on its own would not result in any significant effects, it has been demonstrated through research, and agreed by Natural England (the government's statutory nature conservation advisors) that any net increase (even single dwellings) would have a likely significant effect on the SPAs when considered in combination with other plans and projects.

Havant Borough Council has adopted a strategy whereby a scale of developer contributions has been agreed that would fund the delivery of measures to address these issues and to demonstrate that HBC as a competent authority under the provisions of the Habitats Regulations has had regard for any potential impacts that the project may have.

The proposed location of the new building is presented to be of limited ecological value and as such ecological impacts are not considered to be significant, provided lighting impacts are reduced to an absolute minimum, and that the landscaping proposals can be designed to replace and enhance the scrub and mature tree habitats that will be removed to implement the development. The existing building identified for demolition were not identified to support protected species and works to this structures is therefore not considered likely to give rise to significant ecological impacts.

Certain features of ecological value within the site were identified, associated with the existing mature garden. This area provides mature trees and scrub habitats suitable for supporting protected species including amphibians, nesting birds and supporting low level activity of more common species of bats. Although not all this habitat has been identified as being directly lost under the proposed development, construction impacts and landscaping activities may have the potential to impact protected species in these areas.

The proposed building and parking provision are both on a larger scale than existing. This appears to reduce the amount of open grassland and scrub within the site, potentially created a net loss of biodiversity through implementation of the development.

Measures necessary to retain adequate screening of the site mean that retention of the mature trees and scrub has been maximised. The Arboricultural officer has

described satisfaction for the protection measures for retaining mature trees, and therefore impacts to these (including the mature Cypress T 36 which retains bat roosting potential in the south east of the site)

The detail with respect to the landscaping proposals are currently limited to the information in the block plan. These proposals will need to be provided in more detail and should show that they carefully enhance the areas of trees and scrub that are being retained, as well as replacing that which is being removed in order that a net loss of biodiversity does not result from this development. The provision of new hedging to the west of the site is noted; such measures will be essential in achieving this balance. **Provision of such a detail landscape proposal should be made subject to a condition**; this will need to carefully consider the mitigation requirements set out in both the ecological reports with respect to native species and layout to maximise potential benefit to foraging bats. This landscaping proposal should also include the location of the two bat boxes, as set out in EPR, 2017.

There is little information provided on external lighting; lighting has the potential to significantly impact nocturnal animals utilising the site, and impacts arising from this remain uncertain (EPR, 2017). **A detailed lighting proposal** which carefully considers the advice provided within paragraphs 5.6-5.8 of this document **will need to be subject to condition**.

In order to ensure that protected species are not impacted by the construction or landscaping activities, a condition or note should be attached to any permission granted which ensures that the development is conducted as per the advice within 5.2.5 and 5.2.6 of HCC 2015 and 5.3 and 5.4 of EPR 2017. Possible wording might be:

Development shall proceed in accordance with the ecological mitigation measures set out within Section 5.2.5 and 5.2.6 of Ecological Appraisal (Hampshire County Council, January 2015) and Section 5.3 and 5.4 of Bat Emergence/Re-entry Survey Report (EPR, July 2017) relating to the timing of site clearance and demolition and ecological supervision. Reason: to protect and enhance biodiversity in accordance with the Conservation Regulations 2010, NPPF, and the Natural Environment and Rural Communities Act 2006.

I hope that these comments

kind regards

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