

Consultee Comments for Planning Application APP/24/00330

Application Summary

Application Number: APP/24/00330

Address: Land to the west of B&Q, Purbrook Way, Havant

Proposal: Erection of retail foodstore with associated car parking, access, landscaping and engineering works.

Case Officer: Kayleigh Taylor

Consultee Details

Name: Consultee Principal Ecologist

Address: Public Service Plaza, Civic Centre Road, Havant PO9 2AX

Email: Not Available

On Behalf Of: Ecologist

Comments

Dear Kayleigh,

APP/24/00330 | Erection of retail foodstore with associated car parking, access, landscaping and engineering works. | Land to the west of B&Q, Purbrook Way, Havant

Thank you for consulting me on this application. This is a new application on the site of the previously approved, and partly commenced, APP/20/01221.

The application is accompanied by a Biodiversity Net Gain Report (RPS, April 2024) and accompanying BNG Metric and Condition Assessments. On a BNG technical note, the Metric is incomplete: the title page is showing that the name of the assessor and the date of completion are not completed. This needs to be corrected immediately.

I would also highlight that the ecological mitigation, compensation and enhancement measures agreed for the previous application remain valid and should be included within this application, not just the BNG measures. For example, the previous proposal included a number of Hazel Dormouse boxes and Bat boxes: these are not included in the latest application plans. It is expected that all previous ecological measures are carried forward to the amended site and I expect the submitted documents to reflect this.

The BNG assessment is based upon a modified site habitat baseline from the permitted scheme. The bulk of vegetation was cleared in 2023 in accordance with the permitted scheme, and the new baseline is calculated based on the part-cleared site. This is in accordance with BNG legislation and guidance. There is no fundamental issue with the submitted BNG calculations, with an estimated 54% gain in habitats. However, the Metric trading rules are not currently satisfied. The

loss of woodland to create the new pedestrian/cycle link to the east will require woodland habitat to be found. The BNG report states that off-site units/credits will be used. This is an acceptable outcome in respect to BNG and the applicant will need to provide full details of any off-site BNG provision within a Biodiversity Gain Plan and Habitat Management and Monitoring Plan prior to commencement.

The LPA is obliged to secure any significant on-site BNG provision through legal agreement rather than planning condition. I would welcome clarification from the applicant on the extent of on-site habitat considered to be significant in the context of BNG. The default position from the LPA is that all BNG habitat on-site is significant. It is a legal requirement of BNG that all significant habitat is secured and managed appropriately for at least thirty years. Similarly, all off-site BNG provision (once acquired) will need to be legally secured.

There is in my view a missed opportunity in respect to BNG. For example, the proposed ornamental ground cover and shrub mixes could very easily be incorporated into the BNG offering and include native species: this seems to be a straightforward option to provide a more biodiverse site rather than standard ornamental species landscaping. It is unclear whether a change from standard ornamental plantings to a native shrub/woodland mix would allow a betterment in terms of BNG trading rules for habitats. I would welcome comments on why there is not further opportunity for native-led landscaping (especially to the west, away from public facing areas).

In summary, there are some points that require clarification and amendment before I can recommend that ecological matters are addressed.

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

Kind regards,

Tristan

Tristan Norton

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