

Dear David,

APP/21/00601 | Proposed Portsmouth Water Headquarters building (Use Class E(g)(i) use) and new employment premises (Use Class B2.B8/E(g)(iii) use); widened access onto Solent Road; and associated access, car parking, landscaping and works; including the felling of 7No. trees the subject of TPO No.1801 in order to improve the access and allow for the development. | Land north of Solent Road (adjacent to Bosmere Medical Centre) Havant 21.1267

Thank you for consulting me on this application. Thank you for your patience.

The application is accompanied by an Ecological Assessment (Ecology Solutions, April 2021). This report provides an update to previous survey and assessment works carried out in 2018-19. The application now includes a Habitats Regulations Assessment (Ecology Solutions, October 2021).

The site comprises a large area of species-poor grassland with associated areas of taller herbaceous vegetation, boundary scrub and tall shrubs and trees. A tennis court is present in the site's north-eastern corner and a small watercourse, the Brockhampton Stream, runs along the northern and western boundaries. I am content that the site is of relatively limited ecological value overall, although clearly serves as a valuable area of undeveloped local greenspace.

The site is included within the Solent Waders & Brent Goose Strategy (SWBGS) as Site H11, a Low Use area that has been used by only two Oystercatchers in recent years. I would suspect that the generally unmanaged nature of the grassland at present is less suitable for wintering wader species, and that the site is unsuitable for supporting Dark-bellied Brent Geese. Nevertheless, the site is included within the SWBGS and does provide land functionally-linked to the Solent Special Protection Areas and therefore mitigation for the loss of a Low Use site will be required. This is in the form of a financial contribution based on a per-hectare calculation as detailed within the published SWBGS Mitigation Guidelines. Details are provided within the submitted HRA and are acceptable. The HRA also includes details of mitigation for the issue of nutrient neutrality.

Perhaps the most significant habitat on site is the Brockhampton Stream at the site's boundaries. I welcome the inclusion of a buffer zone alongside the stream and the proposals for this to comprise native grassland and some tree/shrub plantings. The proposed 'wildflower' grassland specification is now included and comprises a newly-created native general meadow mix. The details provided in the appended Biodiversity

Net Gain assessment refer to twice-annual management of this grassland, which is suitable.

I remain unconvinced about the use of ornamental species such as Tutsan *Hypericum androsaemum*. The native plant is a scarce woodland species, and the non-native variety (which I suspect is being proposed here) has invasive tendencies: it's use within the western proposed plantings is not appropriate. Similarly, Sea-buckthorn *Hippophae rhamnoides* also seems like an odd choice as this is also potentially invasive, to the detriment of native flora: again, it's use in close proximity to the watercourse (which links to the nearby Solent marine habitats) is not appropriate in my view. Having formalised plantings beds within a few metres of the watercourse raises the potential for nutrients (from mulch) or chemicals (from spot treatment during establishment) to enter the watercourse and its buffer. Some further clarification on these matters would be welcome, and a more innovative native-led planting scheme would provide obvious biodiversity benefits.

I would also like to see more ambitious incorporated enhancements in the built realm. There are a total of two proposed swift boxes on the whole site, in addition to a total of three tree-mounted bat boxes and two other bird boxes. I would suggest that the new office buildings provide a ready opportunity for further integral or wall-mounted nest boxes for Common Swift.

The amended lighting layout reduces the light spillage onto the northern and western boundaries adjacent to the Brockhampton Stream and this is welcomed.

The issues of additional Swift boxes and inappropriate plantings notwithstanding, if you are minded to grant permission can I suggest that ecological mitigation, compensation and enhancement measures are secured by condition.

Development shall proceed in strict accordance with the ecological mitigation, compensation and enhancement measures detailed within the Ecological Assessment (Ecology Solutions, April 2021) and Habitats Regulations Assessment (Ecology Solutions, October 2021) unless otherwise agreed in writing by the Local Planning Authority. Ecological mitigation, compensation and enhancement measures shall be implemented as per ecologist's instructions. Reason: to protect biodiversity in accordance with the Conservation Regulations 2019, Wildlife & Countryside Act 1981, the NERC Act (2006), NPPF and Policy CS 11 of the Havant Borough Core Strategy March 2011.

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

Kind regards,

Tristan

Tristan Norton

**Senior Ecologist
Ecology Team**

Specialist Environment Services

Economy, Transport and Environment Department
Hampshire County Council
Elizabeth II Court West
The Castle, Winchester
Hampshire SO23 8UD
Direct Line: 01962 832335

Mobile: 07784 261774

E-mail: tristan.norton@hants.gov.uk; www.hants.gov.uk/biodiversity