

Consultee Comments for Planning Application APP/21/01434

Application Summary

Application Number: APP/21/01434

Address: Rook Farm, land off St Marys Road, Hayling Island

Proposal: Outline application for development of up to 300 dwellings (including affordable housing). The proposal includes provision for structural planting and landscaping; informal public open space; children's play areas; sustainable drainage system (SuDS); a new vehicular access from St Mary's Road; and associated ancillary works. All matters reserved except for means of vehicular access. Accompanied by an Environmental Statement.

Case Officer: David Eaves

Consultee Details

Name: Mr Tristan Norton

Address: Elizabeth II Court West, The Castle, Winchester SO23 8UD

Email: tristan.norton@hants.gov.uk

On Behalf Of: County Ecologist

Comments

Dear David,

APP/21/01434 | Outline application for development of up to 300 dwellings (including affordable housing). The proposal includes provision for structural planting and landscaping; informal public open space; children's play areas; sustainable drainage system (SuDS); a new vehicular access from St Mary's Road; and associated ancillary works. All matters reserved except for means of vehicular access. Accompanied by an Environmental Statement. | Rook Farm, land off St Marys Road, Hayling Island 22.0103

Thank you for consulting me on this application.

The application is accompanied by an Ecological Impact Assessment and an Information to inform Habitats Regulations Assessment report (CSA, October 2021), an Environmental Statement (Wardell-Armstrong, December 2021) and a redacted Biodiversity Net Gain document. The Local Planning Authority will need to review the original Biodiversity Net Gain calculations (the completed spreadsheet) before providing further comment.

The site has been subject to desk-based and field-based ecological assessments in 2021, with surveys for overwintering birds ongoing. The site comprises two extensive arable fields with boundary features including ditches, semi-improved grassland, scrub, trees, hedgerows and a pond.

SPA Supporting Habitat

The site is included in the current Solent Waders & Brent Goose Strategy (SWBGS) as Site H46B. The site is classified as a Core Support Area based on a detailed history of large numbers of Dark-bellied Brent Geese using the site during winter months. The site, when in suitable condition, is clearly attractive to substantial numbers of the local Brent Goose population and therefore constitutes a significant area of habitat functionally-linked to the nearby Chichester & Langstone Harbours Special Protection Area and Ramsar site. The proposal would result in the total loss of Site H46B. In order for this loss to be judged acceptable, an appropriate mitigation/compensation package will be required. Mitigation/compensation should be based on the published SWBGS Guidance on Mitigation and Off-setting Requirements which, for Core Support Areas, states A suitable replacement site of an equal, or in some circumstances greater, size and quality must be provided in close enough proximity to the Core Area affected to fully replace its ecological function. The freehold or long term lease (in perpetuity) of the replacement site must be passed to an appropriate conservation body, or the LPA, in a suitable condition and managed in perpetuity as a nature reserve for waders and / or brent geese.

Currently no details are provided on the location, current habitat quality or management of any proposed off-site refuge. I cannot therefore comment further on this issue and must request that further information is provided so that the Local Planning Authority can determine if this solution is acceptable and in accordance with the Habitats Regulations. Further information must include: results of overwintering bird surveys (these are presumably continuing until end-March 2022); assessment of proposed refuge site; evidence that refuge site can provide at least the same function to SPA/Ramsar birds as the existing site; details of any enhancements to refuge site details of ongoing management (methods, timings, responsible organisation) of refuge. The refuge must be able to provide its alternative function prior to impacts occurring on the existing site.

Habitats

I am content that the on-site habitats are of relatively low ecological value. The bulk of the site comprises arable farmland and is of limited ecological value. The field margins do support a typical arable weed flora which, in the context of an arable landscape, are important biodiversity features regardless of whether scarce species occur. Arable weed species such as Knotgrass, docks, thistles and Fat-hen provide important food resources for farmland bird species.

The grassland within the site is described as semi-improved, with the largest area situated in the east of the site. Other areas comprise uncultivated field margins. From the submitted plant species lists I am in agreement that these grassland areas are generally species-poor and semi-improved. Their chief ecological value lies in their function as shelter for various protected species (e.g. reptiles) and connecting habitat in an otherwise unremarkable arable landscape. Their association with other habitats such as scrub, hedgerows and trees increases their value as wildlife corridors.

Areas of dense scrub - dominated by Blackthorn, Hawthorn and willows are present within the central and eastern portions of the site. The site boundaries contain several hedgerows, and these

are a mix of intact and incomplete habitats of Blackthorn and Hawthorn with occasional taller trees and some areas of non-native ornamental species. These are typical of the wider landscape.

A small pond, largely overgrown, is present in the centre of the site. The pond is largely covered with dense emergent vegetation and surrounded by dense scrub. As identified in the ecological impact assessment, the pond will provide a valuable freshwater habitat in this landscape and is likely to be of value to a range of species in an otherwise unremarkable site. The pond is connected to a narrow drainage ditch, and other ditches are present along other boundaries. The ditches are intermittently wet and their key function will be as potential habitat corridors in association with other habitats.

I am content that overall the site is largely of limited ecological value. However, the value of even species-poor and degraded habitats such as grass margins, hedgerows, scrub and ditches is increased in the context of an arable-dominated site.

Species

Walked transect and automated surveys have highlighted the presence of several bat species within the site. There is no evidence of roosting on site, and bat activity is unsurprisingly dominated by the two pipistrelle species. Other bat species have been recorded on site, including mouse-eared species and the scarce Nathusius Pipistrelle. Bat activity in general is typically concentrated around structured linear features. I am content that sufficient bat survey information is presented and that the developed site can retain sufficient semi-natural habitat to attract bat species. It will be essential to ensure that a suitable lighting strategy is secured which ensures that habitat likely to be used by bats will not be subject to artificial illumination. The developed site provides an opportunity for embedded ecological enhancements such as integral bat roosting units within new dwellings.

The site supports a population of Slow-worms, with around sixty animals recorded within grassy margins and breeding confirmed by the presence of young animals. The proposed development will remove the vast majority of reptile habitat and therefore a suitable alternative compensatory habitat will be required. No firm details are provided, although the northern area of open greenspace is posited as a potential refuge area. This may be an acceptable approach, provided that the various uses to which this area seems destined (LEAP, footpaths, community allotments) allow for meaningful semi-natural habitat to occur.

The site supports a range of typical breeding bird species. I am content that sufficient survey information has been provided. The most notable species is Skylark, with two territories noted straddling the application site and adjacent grassland. It is inevitable that this species in particular will be lost from the site: the loss of arable land plus the increase in recreational usage of the accessible grassland to the north are highly unlikely to be conducive to retaining breeding Skylarks. Similarly, the presence of scrub, hedge and ground-nesting species such as Whitethroat, Dunnock, warblers and other smaller species is unlikely to be maintained post-development.

These impacts can be mitigated to a degree by the use of suitable habitat within areas of greenspace and the provision of nest boxes within the developed areas. As with reptiles, the value of proposed landscaping areas for bird species will be dependent upon the extent to which these areas are subject to disturbance.

In summary, further information is required before I can provide fully-detailed consultation advice. There are outstanding issues relating to the feasibility of any proposed off-site winter bird refuge: in accordance with its duties under the Habitats Regulations the LPA needs to be able to assess any proposals in detail prior to determination of this outline application.

Whilst the site is generally of limited ecological value in terms of semi-natural habitats and protected and notable species, there will certainly be a loss of biodiversity. The provision of new landscaping areas suitable for supporting the various species recorded on site is welcome, although the benefits of these areas need to be tempered by their function as accessible greenspace at the edge of a dense new housing development. Only outline mitigation, compensation and enhancement measures are provided and, whilst it may be acceptable to require further (full) details of these matters at detailed design stage, I would rather have at least a more detailed outline of the range of measures to be provided so that we can establish a baseline expectation at outline stage.

No Biodiversity Net Gain calculations are provided. Whilst BNG is not yet a legal requirement for developments, I welcome its inclusion in this instance. In order for me to verify the BNG calculation it is essential for me to have access to the original BNG metric calculations in spreadsheet form.

NPPF, Circular 06/2005 and Natural England Standing Advice on Protected Species, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the LPA prior to determination, particularly in the case of protected species, which are a material planning consideration. This will enable the LPA to determine the application on the basis of full knowledge about the ecological impacts of the proposal and to ensure that any impacts can and will be mitigated, and are acceptable.

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