

APP/16/00952 | Construction and operation of a 20MW Peaking Power Generation Plant, Ancillary Equipment and Access. | Blendworth Common, Havant Road, Horndean, Waterlooville 16.1901

Thank you for consulting me on this application. I consider that there are some points of clarification required.

The application is accompanied by a Preliminary Ecological Appraisal (Environment Systems Ltd, September 2016) which provides a useful assessment of the site's current ecological value. I have provided comments to East Hampshire District Council on the proposals for the access track and have requested some clarification on various ecological matters.

The plant facility itself is to be situated within an area of semi-natural grassland and trees and will abut other semi-natural habitats. This land is within Blendworth Common Site of Importance for Nature Conservation (SINC) and is immediately adjacent to Bell's Copse SINC and Havant Thicket SINC. The loss of land within Blendworth Common SINC would be contrary to Policy CS11 of the Havant Core Strategy, unless the works would not result in significant impacts to the SINC. I would disagree with the statement that "*the majority of effects will be temporary*" as there will be a permanent net loss of SINC habitat of c.3200m² for the plant itself (this does not include working areas presumably?) plus an additional amount for the proposed access track (which is 5m x 1.5km in length in total). The total application site is 2.34 hectares, much of which is within the SINC.

The proposal will result in the loss of two mature oak trees which form part of the open parkland setting of Blendworth Common. Aside from Tree 21 (per the ecology report) I am not entirely sure which other tree is being removed – the ecology report does not say which it is, but seems to refer to two trees (is target Note 21 actually two trees? Does TN21 on Table 1 refer to one or two trees?). Some clarification is required here.

There are no methods described for the tree assessments for bats. Tree surveys from ground level are certainly limited as trees often exhibit features that are simply not visible from a surveyor at ground level. As an example, one of the largest Bechstein's bat roosts locally (within c.1.5km) is situated within a hole on the upper side of a parkland oak branch and is not visible from ground level at all.

Although it is not very easy to determine from Figure 1 on p.7 of the ecology report, Tree 12 (offering high bat roosting potential) would appear to be very close to/within the route of the proposed access track and Tree 11 is close by too. Is there not any potential for construction or operational impacts to such trees, especially when they appear to exhibit features with potential for use by Bechstein's bat? (these are exactly the types of features that are used by bats within the highly-important local population).

There is no detail provided on any root protection zones for retained parkland trees (or those adjacent to the proposed access track). How are trees not directly affected to be protected during and after construction?

The ecology report does not address the potential presence of key bird species such as nightjar, which is known to breed within Havant Thicket and Bell's Copse. Similarly, there are records of Dartford warbler from Blendworth Common.

There is no link between the ecology report and other technical reports e.g. noise. I am unsure whether the operating facility is likely to result in noise levels which will impact biodiversity e.g. breeding birds.

There will in fact be site lighting, as the facility will require motion-activated lighting. No further details of this are provided and this is not mentioned within the ecological assessment.

The ecology report states that construction works will be undertaken during late autumn/winter but there is no other evidence to corroborate this.

In summary, the submitted ecological assessment does not provide sufficient information at this stage to conclude that impacts are acceptable. The proposals will result in a net loss of SINC habitat, and are within proximity to other SINC containing quiet woodland and woodland/heathland habitats.

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

Kind regards,

Tristan

Tristan Norton

**Senior Ecologist
Ecology Team**