

Dear Lewis,

APP/21/01010 | Erection of 194 No. dwellings, means of access, public open space, play areas, associated infrastructure and landscaping. | Land east of, St Georges Avenue, Havant 21.1217

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

The application is accompanied by an Ecological Appraisal (WYG, June 2020), a Great Crested Newt eDNA Survey report (WYG, May 2020) and a Report to Inform Habitats Regulations Assessment Stage 1 and Stage 2 (Tetra Tech, June 2021). The application site comprises a triangular area of predominantly arable land with associated semi-improved grassland, scrub and bare ground.

The application site is listed within the Solent Waders & Brent Goose Strategy (SWBGS) as Site H19, a Low Use site. In the case of H19 there is a 2011 record of 13 Curlew using the site on one occasion. The proposal will result in the near-total loss of H19, following the previous permission of residential housing on the western portion of H19. The Solent Waders and Brent Goose Strategy Guidance on Mitigation and Off-setting Requirements provides a framework for mitigation options for impacts to SWBGS sites, essentially requiring per-hectare financial contributions towards off-site mitigation measures designed to protect and enhance the wider SWBGS network of sites. The applicant is proposing that the loss of H19 is compensated by the payment of a financial contribution (equating to c.£192,000). If this sum is acceptable, Havant Borough Council will need to ensure that a suitable compensatory site or sites is determined: this would ideally be within the same local landscape and provide habitat suitable for supporting farmland wader species. The views of Natural England are critical on this matter. Given the minimal usage of H19 by SPA birds I would suggest that the compensatory proposal is an acceptable approach in this circumstance.

In terms of other ecological constraints, the site has been subject to a preliminary ecological assessment and a small off-site pond has been subject to DNA analysis for Great Crested Newts. The Ecological Appraisal recommends that further surveys are carried out for various species. I cannot find any such survey results within the submitted documents.

In accordance with emerging Local Plan policy and Havant's Biodiversity Strategy I would strongly recommend that further ecological enhancements are sought within the built area. For example, there is no reason why a significant proportion of new dwellings should not incorporate built-in enhancement features such as cavity bat

roosting units and bird nest boxes (especially for common swift, house martin and house sparrow).

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
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