

Dear Lesley,

APP/21/00989 | Outline planning application for the development of 150 dwellings (3-bed; 4-bed and 5-bed dwelling houses and 1-bed and 2-bed apartments) addressing layout, scale and access, including biodiversity enhancements and buffers and species-specific enhancements, SUDS and car parking (with appearance and landscaping matters reserved). | Cabbagefield Row, opposite 123-133, Swanmore Road, Havant 21.1135

Thank you for consulting me on this pre-application submission. Please accept my apologies for the delay in responding to you. I would request that further information is provided.

The application is accompanied by an Ecological Impact Assessment (ECOSA, August 2021). The site comprises a mix of good-quality semi-improved grassland (located in the northern parcel and designated as a SINC) and scrub and is bordered by areas of ancient semi-natural woodland (also SINCs). The site is clearly of some ecological value, and has been shown to support Hazel Dormice (breeding), various species of foraging/commuting bat, a range of breeding bird species, at least three species of reptile, and a number of notable invertebrate species. The site sits within a landscape containing extensive areas of semi-natural habitat, with significant development occurring. The proposed development should be seen in the context of the adjacent ongoing Dunsbury Farm developments and the permitted Havant Thicket Winter Storage Reservoir. This landscape is, and will be, undergoing profound change in the coming years.

In terms of vegetation communities, the southern parcel of land is not of particularly high quality and is best described as poor semi-improved grassland with scrub. Whilst not botanically rich, the habitats clearly provide a substantial area of semi-natural vegetation used by various protected and notable species. The northern parcel is designated as Dunsbury Hill Grassland 2 Site of Importance for Nature Conservation (SINC). This SINC is one of numerous other grassland and woodland SINCs in the landscape, including the immediately adjacent Dunsbury Hill Wood and Cabbagefield Row SINCs, both ancient semi-natural woodland.

Overall, I am concerned that there is a lack of necessary detail on the proposed ecological impacts, mitigation, compensation and enhancement measures. The area to be developed supports a range of species of conservation concerns including Hazel Dormice, foraging/commuting bats, breeding birds, common reptiles and notable invertebrates. The near-total loss of habitat within the southern parcel will result in a significant impact to these species that is not readily mitigated. I do not agree that this loss of habitat is of 'negligible significance'.

Your Arboricultural consultee has queried the proposed woodland buffer as being the bare minimum and I would concur with this. There is an obvious risk that residential development in this location would result in impacts to the adjacent high-value SINC woodlands, via construction-phase impacts (noise, pollution, changes in hydrology) and post-construction impacts, primarily disturbance and damage from new residents. It is not immediately clear how this recreational disturbance is to be avoided/managed – the use of thorny buffers to the woodland is welcome from a purely ecological

perspective but this alone is unlikely to prevent informal access. The surrounding area is already subject to significant disturbance/damage from various uses. What other measures can be deployed to avoid informal access to the woodland SINC or to address any ongoing issues?

There is a lack of detail on proposed lighting. Given the importance of this area to nocturnal species such as Hazel Dormice and bats, and the presence of various notable invertebrate species, the impacts of artificial lighting are potentially significant. I would strongly suggest that full lighting contours are provided in order to demonstrate that the general principles set out in the lighting design strategy and ecology report are followed through, and are achievable. These details should be provided in advance of determination in order that ecological impacts can be robustly assessed. The ecologist will need to provide detailed commentary on any lighting plans, taking into account the identified ecological features.

Overall mitigation, compensation and enhancement is reliant primarily on the management of the Dunsbury Hill Grassland 2 SINC, the aim of which is to bring the site into better botanical condition. This is a welcome measure, but no details are provided of how this will be achieved. I consider that further details of proposed management – How? When? By whom? – should be provided now, alongside details of how success will be monitored and gauged. I do not consider that these details should be left to condition.

It is not immediately clear that the proposed woodland buffers will compensate for the impacts to Hazel Dormouse habitat. The proposal will result in an undetermined amount of scrub loss – will the proposed buffer compensate for this loss? Without comparable loss/gain measurements I am unable to determine this. Given the proximity of built development to these buffers, will this affect their suitability for Dormice? Are there further opportunities within the retained grassland SINC to include additional scrub habitat? Further detail is required on this issue before I can determine that impacts to this species are acceptable.

Similarly, for nesting birds there appears to be an overall loss in habitat. The southern parcel of land supports a range of species reliant on scrub and woodland habitat, all of which will be removed. Again, it is unclear whether the proposed woodland buffer habitat will provide suitable compensatory habitat for the species recorded: I would suggest that species such as Yellowhammer and Bullfinch would be highly unlikely to continue to nest in close proximity to built development. Does the retained SINC provide opportunity to increase scrub habitat? I would concur with the Hampshire Swifts correspondence that further nesting boxes for this declining species can be included – the total of boxes recommended is not especially ambitious. Integral swift boxes are inexpensive yet have demonstrable benefits.

I am unclear how the stated aim of increasing grassland condition within the northern SINC, presumably via grazing or mowing, is consistent with the use of this area as a reptile receptor area. Increasing botanical diversity would require the regular management of the grassland and the removal of arisings: to make the area more suitable for reptiles will require areas of longer, unmanaged grassland and scrub. Further details are required.

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

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