APP/21/00189 | Outline application for the development of new employment units to provide up to 29,000 sq m (gross internal area) for flexible use across use classes E (light industrial), B2 and B8 with ancillary offices, car parking, service yards, drainage works, landscaping and associated works to prepare the site for development. All matters are reserved except the primary means of access to the site. | Brockhampton West, Harts Farm Way, Havant 21.0517

Thank you for consulting me on this application. Please accept my apologies for the delay in responding to you.

Following my recent comments dated 17 June 2021, no new substantive information has been provided.

I acknowledge the desire to utilise native site grass and wildflower seed. My comments related to the retention of areas of existing grassland also. It would appear that no new information will be forthcoming and so I would expect further details of exactly how on-site species-rich grassland will be protected and retained within the landscaping scheme to be provided within a pre-commencement report.

Policy BD11 of the current Local Plan states that '*enhancements to Broadmarsh Coastal Park to mitigate the loss of green space*' are required. Although given limited weight at this time, Policy C10 of the Submission Local Plan states that '*Mitigation for Solent Waders and Brent Geese is provided upfront, prior to development, and to the satisfaction of the Council in line with Policy E17*' and '*Enhancements to Broadmarsh Coastal Park are secured to mitigate the loss of greenspace, in line with Policy E2*'. In respect to the loss of SWBGS supporting habitat it is again for Havant Borough Council to ensure that a financial contribution, appropriate to the loss of Low Use functionally linked land, is secured. The loss of greenspace is acknowledged within current and Submission Local Plan Policy. It is expected that enhancements to the Broadmarsh Coastal Park are secured. It is for HBC to secure an appropriate level of payment. It is not yet apparent exactly what enhancements would be possible or delivered by this proposal.

The lack of engagement with embedding biodiversity within the built form is disappointing. Whilst the buildings themselves may not be suitable for e.g. green/brown roofs, there are many other enhancements that can be made within the built areas that would benefit biodiversity and assist in mitigating the overall loss of ecological value.

If you are minded to grant permission, can I suggest that a site-wide Ecological Mitigation, Compensation and Enhancement Strategy is secured by condition. This should provide detailed measures for the protection, retention, creation and ongoing management/monitoring of ecological features within the site.

Prior to the commencement of development activities, a detailed Ecological Mitigation, Compensation and Enhancement Strategy shall be submitted to and approved in writing by the Local Planning Authority. Ecological mitigation, compensation and enhancement measures shall be in accordance with outline measures detailed within the Ecology Report (Applied Ecology, February 2021) and Habitats Regulations Assessment (Applied Ecology, April 2021) unless otherwise agreed in writing by the

local planning authority. The Strategy shall include (but not necessarily be restricted to): details of all habitat and species mitigation measures; details of the location, composition and ongoing management of all compensatory or enhancement habitat; details of off-site measures to mitigate the loss of local greenspace; location, type and number of all bat/bird boxes; details of lighting. All ecological compensation/enhancement measures shall be implemented in accordance with ecologist's instructions and retained in a location and condition suited to their intended function. Reason: to protect and enhance biodiversity in accordance with the Conservation Regulations 2019, the Wildlife & Countryside Act 1981 (as amended), the NERC Act 2006, NPPF and Policy CS 11 of the Havant Borough Core Strategy March 2011.

In addition, I would recommend that a Construction Environment Management Plan (CEMP) is secured. This should include full details of all measures to avoid/mitigate construction impacts on the natural environment.

Prior to the commencement of development activities a Construction Environment Management Plan (CEMP) shall be submitted to and agreed in writing by the Local Planning Authority. This shall include details of measures to avoid harm to the natural environment, including explicit avoidance and mitigation measures and the roles and responsibilities of those persons responsible for implementing the agreed CEMP . 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