

From: Norton, Tristan <Tristan.Norton@hants.gov.uk>
Sent: 18 March 2016 14:06
To: David Eaves
Cc: Planning and Development Shared Mailbox; Havant Auto-Reply
Subject: APP/15/01435 | Outline application for residential development (175 dwellings) with associated infrastructure. | Land South of Bartons Road, Havant 16.0425

Dear David,

APP/15/01435 | Outline application for residential development (175 dwellings) with associated infrastructure. | Land South of Bartons Road, Havant 16.0425

Thank you for consulting me on this application. I consider that additional ecological information is required.

The application is accompanied by a Preliminary Ecological Appraisal and Phase 1 Habitat Assessment (The Ecology Co-op, July 2015), a Bat Emergence, Activity and Tree Climbing Survey (The Ecology Co-op, September 2015) and a Reptile Survey Report (The Ecology Co-op, October 2014). These reports are fine in terms of providing baseline information on the botanical value of the site. However, there is essentially no 'preliminary ecological assessment' describing the entire application site and its overall ecological value, both in terms of habitats and protected species: the only vegetation descriptions given are for a small area of semi-improved grassland in the north-east of the application plot. It appears that there may be an initial report available, just not submitted.

I am concerned that the wider implications for bats have not been covered adequately. For a large application site situated within close proximity to trees and woodland supporting one of the rarest bats in the UK the submitted bat assessment is not sufficient. There is a record of the very rare Bechstein's bat from woodland a few hundred metres to the north (and which is linked to the woodland on the eastern side of the application site) and the largest Bechstein's bat roost in the county is situated just over a kilometre east of the site: the published Core Sustainance Zone for this species (the area of land required for the continued viability of a breeding population) is 3km surrounding a roost. A detailed desk-based assessment would have highlighted this. Bechstein's bats in south Hampshire are associated not only with mature woodland but also parkland trees, such as exist immediately adjacent to this site. Although the bulk of the site comprises arable farmland I would suggest that any development in proximity to woodland in this area should be accompanied by a discussion of Bechstein's' bats and, where necessary, a bat survey which includes specific methods for Bechstein's bat (as per current best practice guidance), looking at the potential presence of roosts within adjacent trees and woodland and also the levels of bat activity within associated habitats (such hedgerows, trees and grassland). The bat surveys carried out here did pick up unidentified mouse-eared bat calls (Bechstein's is one of several species of mouse-eared bat in Britain and by far the rarest) and so these may potentially be Bechstein's bats. Further information is required.

A single common pipistrelle roost was identified within an oak tree on site and this should be relatively straightforward to mitigate – the tree will be retained in any case.

A population of slow-worms and common lizards has been identified and mitigation/compensation comprises the retention and management of an area of semi-improved grassland to the north-east, outside the red line boundary. In general, the reptile measures are acceptable.

In summary, I have queries in respect to the lack of an initial Phase 1 ecological assessment and also on the potential for rare bat species to be present locally and impacted by such a large scheme. NPPF and Circular 06/2005 require that planning decisions are based on full, up to date information and, in line with Natural England's standing advice, full protected species information must be available before a decision can be made. Following this guidance, provision of this information should not be deferred as a condition of any planning permission.

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

Kind regards,

Tristan

Tristan Norton

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Please note that this advice is given in accordance with the Service Level Agreement that has been signed between Hampshire County Council and your Council. These comments are expressed as a professional view provided to Havant Borough Council and should not, therefore, be interpreted as those of Hampshire County Council.

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