

Houghton, Michelle

From: Norton, Tristan <Tristan.Norton@hants.gov.uk>
Sent: 17 June 2021 11:07
To: Wells, Lesley
Cc: Havant Planning and Development Mailbox New
Subject: APP/21/00189 Brockhampton West, Harts Farm Way, Havant 21.0517

Dear Lesley,

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 comments from my colleague, the application is now accompanied by a Response to Hants County Council Ecology consultation email 8.4.21 (Applied Ecology, April 2021) and a Habitats Regulations Assessment (Applied Ecology, April 2021). I have reviewed these documents as well as the original Ecology Report (Applied Ecology, February 2021).

The site comprises an area of former landfill which has been colonised by semi-natural habitats over the last 30 years or so, developing into an area of semi-improved grassland with areas of mature secondary woodland and scrub at the boundaries and throughout. The grassland on site retains some areas of more species-rich composition, containing a range of species that are considered to be of interest at the County level (so-called axiophytes such as grass vetchling, corky-fruited water-dropwort, meadow barley). Whilst the recent email from Applied Ecology is technically correct in stating that these species are not 'rare' at the County level (they do not feature on the Hampshire Rare Plants Register), they are nevertheless indicative of better-quality semi-improved grassland and the LPA does not simply base its interpretations of value on a narrowly-defined legal definition. The proposals will result in the loss of the majority of grassland habitat on site, that grassland is species-rich in places and forms a valuable part of the local ecological network. Should the proposal receive permission, I consider it essential that areas of the existing grassland sward are utilised within the landscaping proposals, rather than create a 'new' generic meadow using a wildflower seed mix. The benefits of utilising existing grass swards are many, including providing continuity of habitat for various organisms as well as ensuring rapid availability of habitat (rather than waiting for new grassland to establish over several years). I would expect such details to be provided within an ecological mitigation, compensation and enhancement plan that is in full accordance with any detailed landscaping proposals. Given the proposed floorspace of the new buildings I would expect there to be some consideration of features such as green/brown roofs in order to integrate biodiversity into the built form.

The western part of the site is listed as Site H08 in the Solent Waders & Brent Goose Strategy (SWBGS) based on previous use of the site by low numbers of dark-bellied brent geese: the site is clearly now unsuitable due to the lack of shorter grassland and recreational pressure, but nevertheless remains suitable for inclusion in the network based on its potential to be managed appropriately and be of use to SPA in the future. The proposals will result in the loss of this SWBGS Low Use site and therefore will reduce the extent of supporting habitat associated with the nearby Solent Special Protection Areas (SPAs). In accordance with the published SWBGS Mitigation

Guidelines, mitigation is required. For Low Use sites, a financial contribution towards the protection of the wider SWBGS network is appropriate. It is for Havant Borough Council to ensure that this contribution is targeted towards meaningful enhancements of the wider network, unless the applicant has identified a site to which contributions can be channelled.

The site also forms a valuable local greenspace used for informal recreation by the public. Whilst this usage is likely to present some ecological issues (such as dog fouling, general disturbance, littering) it does 'soak up' some recreational pressure which might otherwise be felt on the nearby SPA itself or other areas of SPA supporting habitat in close proximity. The development of the site would result in the loss of this informal recreational space and be likely to push that existing pressure onto the SPA and other functionally-linked land nearby. This potential impact is not included within the submitted HRA and I note that Natural England have commented on this issue. There is also the potential issue of employees at the new site adding to existing recreational pressure on the local SPA and its supporting habitat. Consideration of the impact on recreational use of functionally-linked land is necessary.

I am content that the site is unlikely to support hazel dormice. This species is not recorded in this part of Havant Borough and I would consider it unlikely that such an urbanised locality would support a population. No further information is required.

The site is included in the Ecological Network map for Hampshire. This again highlights the local value of this area of greenspace – its loss would result in impacts greater than those arising from 'simply' habitat loss at the site scale and would further diminish the availability of semi-natural habitat in this already well-developed area. The proposal must address the impacts to the local ecological network and show how the mitigation hierarchy has been applied to ensure that losses are avoided and minimised. Where impacts are unavoidable, the LPA seeks to maximise biodiversity value and all opportunities to incorporate biodiversity should be explored.

The Bat Activity Survey report details the results of manual transects and automated monitoring. These surveys covered the period late July to September 2020. No bat surveys were conducted between April and mid-July. Conducting bat surveys throughout the active season is not simply of 'academic interest', rather it allows the LPA to be presented with full information on which to base planning decisions. There is every reason to consider that bat activity surveys within the whole of the recognised bat survey season are necessary and not just optional, as sites provide differing requirements to bats at differing times of the year. A total of at least seven bat species were recorded on site. This is a reasonable bat assemblage (typical for southern Hampshire) and places the site at local/parish/district value. Whilst it may be true that surveys in the period April to July may not have highlighted substantial differences from later season surveys this is not a valid reason for not undertaking them and is not in accordance with published best practice survey guidance.

The outline nature of the application means that firm details on proposed landscaping are not provided. The options presented in outline provide for some retained habitat around the site peripheries, comprising a mix of trees, scrub and grassland. None of the options provide for any meaningful habitat within the site interior and it is hoped that some imaginative landscaping could provide for better integration of the built form and biodiversity, especially given the substantial losses proposed.

In summary, my main concern is the loss of substantial areas of locally-valuable semi-natural habitat and its effect on the local ecological network. In addition, there is the potential for the loss of local greenspace to have effects on adjacent areas of SPA supporting habitat, thereby undermining the conservation objectives of the adjacent SPAs. Clearly there is a planning balance to be struck but I have concerns over the loss of this valuable urban edge site and the ability of the developed site to provide meaningful ecological mitigation.

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

Kind regards,

Tristan

Tristan Norton

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Coronavirus (Covid-19)

Hampshire County Council's response to the Covid-19 is available here (<https://www.hants.gov.uk/socialcareandhealth/coronavirus>).

In line with Government advice to reduce non-essential travel and work from home where possible, Ecology officers are now working remotely. Whilst we will endeavour to conduct our services in a timely manner and to meet statutory timescales where we can, there may be some impact to the services we deliver. We will ensure that we keep all applicants / interested parties informed of any further impacts to our services should they arise. The Council's response also means that no non-essential site visits or face to face meetings will be undertaken until further notice. Essential and contractual surveys may continue take place where there is no risk to the surveyor or the public, and in line with Government advice. This will be reviewed on an on-going basis.



Hampshire Services offers a range of professional consultancy services to partner organisations. Specialist Environment Services provides data, advice and assessments for ecology, heritage and landscape.

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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.