

Response to County Ecologist's Further Comments (set out in their response of 17th June 2021)

The County Ecologist raised some points in respect of the future development of the site and also noted their concern about the loss of this site from the local ecological network. Given that the site already benefits from an allocation for development for employment use, that is a long standing objective to support economic growth in Havant, so we wanted to re-iterate the point that the principle of developing this site is already considered acceptable by the Planning Authority. We also wanted to make the following points about some of the other matters included in the further response

1. Within the 3rd paragraph of the response, the County Ecologist considers it '*essential that areas of the existing grassland sward are utilised within the landscaping proposals*'. It should be possible to "harvest" the grassland for seeds in the late summer and use the collected seeds as part of the landscape restoration of new grassland areas. We agree to this approach on the proviso that the collected seed may need to be supplemented with an appropriate nature conservation mix as necessary. See <https://www.cdts-ltd.co.uk/seed-harvesting/>
2. In respect of the provision of the potential for Green and/or Brown Roofs at the development, the type of development proposed is wholly unsuitable to accommodate green or brown roofs. To meet their intended use, the structure of employment units such as those proposed on this site are built to provide large spans to create unimpeded open spaces in the unit for storage or to accommodate large equipment for occupiers. To minimise the need for columns, the roof structure needs to be as light as possible, which also means that the least amount of materials as possible are used in its construction. The roofs will already accommodate rooflights to allow natural light in to reduce the need for internal lighting and allow for a better working environment, as well as PV panels as part of the wider sustainability credentials of the development. Any proposal for a brown or green roof will place greater loadings on the structure, require more materials to be used which will add embodied energy in the construction and also lead to a taller structure to accommodate the required clear internal height plus the build-up needed to provide rooflights, pv panels and a brown/green roof. We have considerable experience of this type of development across the UK and the provision of green or brown roofs on a development of this nature is not feasible.
3. Within the 4th paragraph, we note that the County Ecologist has helpfully made the point that it is up to the Borough Council to ensure that the financial contribution towards the SPA that we have agreed to make is targeted towards meaningful enhancement. This accords with our reading of the Mitigation Guidance for the Solent Waders and Brent Goose Strategy.
4. Within the 5th paragraph, comments are made about the existing recreational use of the site. We note that the current recreational use of the site is informal and could be legitimately prevented by the erection of barrier fencing which is in the gift of the site owner. The SWBGS land immediately beyond the site, which dog walkers are most likely to use instead, is already dog walked and therefore any "displacement" of recreational activity is not likely to be particularly significant in SPA disturbance terms. In any event such potential impacts should be compensated by the SPA financial contribution. As stated in the submitted HRA we don't believe that the development itself will directly contribute to recreational pressure in the local area as its only going to be used by workers for work during the day and will not include any residential uses. The financial contribution that would be secured toward improvements to the SWBGS network from this site would in any event support the other areas of habitat in the area.
5. Within the 7th paragraph, issues are raised about the ecological network. As noted above, the fact that the site is allocated in the local plan for employment rather overrides this concern, and I would hope that the financial contribution would help improve ecological networks elsewhere.
6. Within the 8th paragraph, relating to the bat surveys, – it does not appear that additional bat survey work is being requested and it is noted that the County Ecologist has not disagreed with our assessment of bat value, or believes we have underestimated the value of the site for bats. The results of additional bat survey is not going to change or influence development design or layout in the opinion of our ecologist.