

APP/15/00303 Havant Health and Well-Being Campus, comprising an 80-bed nursing home, 51 affordable extra care flats, 48 affordable and market supported living flats, community hub facilities, landscaped amenity gardens, car parking, with vehicular access from River Way and Leigh Road and pedestrian access from Lavant Drive and Crossland Drive with associated infrastructure Former Oak Park School, Leigh Road, Havant 15.0598

Thank you for consulting me on this application. I am somewhat familiar with this site, having visited it on several occasions.

The application is accompanied by a preliminary Ecological Appraisal (Enzygo, November 2014) which provides a generally sound assessment of the site's current ecological value. The site comprises a typical suburban 'brownfield' site containing unmanaged grassland with developing and established scrub, scattered trees and boundary hedging. There were two buildings within the site and these have now been demolished. The site is essentially brownfield and as such is likely to fall within the definition of the NERC Act 2006 section 41 Habitat of Principal Importance 'Open mosaic habitats on previously developed land'. All LPAs are required to prioritise the conservation of HPI within planning decisions.

In terms of ecological value, the site contains common and widespread vegetation types although these are increasingly scarce within Havant and its suburbs: there are very few large areas of unmanaged vegetation present locally. There is a corresponding paucity of protected species likely to be present, although the scrub, hedgerows and trees will undoubtedly support nesting birds (I have seen a variety of common bird species within the site including the red-listed house sparrow and starling) and the grassland will certainly support common reptile species (slow-worm has been observed and common lizard is a distinct possibility). It is highly likely that the site provides a valuable area for local wildlife in general. For instance, there are numerous records of bat species locally and I would expect that there will be roost present in nearby dwellings and bats from those roosts will use the site for foraging/social purposes.

I note that the ecology report recommends that further surveys are carried out in order to provide an estimation of population size and distribution – I agree that this is necessary and such information should be provided prior to determination. A fully-detailed reptile mitigation strategy can then be informed by the field survey results. It would also be of use to record breeding bird species as a means of informing suitable mitigation/enhancement measures.

I note that the submitted site layout plan appears to include little informal open greenspace which may be suitable for ecological enhancement – perhaps this is something which can be addressed in conjunction with the ecological consultant, especially if space is required to harbour reptiles. Given the near total loss of unmanaged vegetation I would expect that a range of ecological enhancement measures (e.g. native species plantings, bat and bird boxes/integrated roost units) should be provided. The eastern boundary of the proposed development is very close to the channel of the Hermitage Stream and there may well be direct and/or indirect impacts to that stream. I would strongly recommend that the applicant

engages with the Environment Agency – I understand that the EA are undertaking a long-term project to improve the ecological value of the Hermitage Stream.

In summary, although the site is a typical neglected urban/suburban brownfield site it does have intrinsic ecological value. There is a requirement to undertake a Phase 2 reptile survey and provide a detailed reptile mitigation strategy should that be necessary.

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. Without full information at the point of determination it is not possible for the LPA to ensure that any impacts are known and acceptable, to engage with the Habitats Regulations, and to be able to secure any necessary mitigation.

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

Kind regards,

Tristan

Tristan Norton

**Senior Ecologist
Ecology Team**