

From: Norton, Tristan <Tristan.Norton@hants.gov.uk>
Sent: 11 June 2015 12:03
To: Daphney Haywood
Cc: Planning and Development Shared Mailbox; Havant Auto-Reply
Subject: APP/15/00478 Dunsbury Hill Farm, Park Lane, Cowplain, Waterlooville

Dear Daphney,

APP/15/00478 Discharge of Condition No/s A1, A2, A3, C2 and C3 of Planning Permission APP/12/00338. Dunsbury Hill Farm, Park Lane, Cowplain, Waterlooville

Thank you for consulting me on this application. Apologies for the length of the following response – as discussed, it's complex and I feel it is important to clearly state exactly what is being discussed.

For clarification, it is my understanding that this application for discharge of conditions relates primarily to the works associated with the spine road and associated works, although includes broad measures for the wider development plots (i.e. incorporates both full and outline parts of the extant permission). There is still a requirement to submit ecological information (to be informed by ecological survey as appropriate) for each remaining phase of development (extending for many years to come). The submitted letter from Peter Brett Associates dated 1st May 2015 does not explicitly state the extent of works for which this condition discharge is being sought: given the significant ecological constraints at this site it is, in my opinion, important to establish exactly what is being determined.

I am also assuming that the overall Masterplan for the site (currently on revision F) will inevitably change and so there will undoubtedly be a need for the applicant to again submit amended details of ecological mitigation, to reflect both a revised development scheme but also any significant findings from ongoing ecological surveys. Any discharge of ecology-related conditions for the wider application site should therefore be clearly qualified so as to secure the requirement to amend details (such as layout, design, landscaping) and reflect the latest ecological findings: in essence, whilst the submitted landscaping strategy as of June 2015 may be acceptable in broad terms the finer details (informed by evidence) must be provided at the requisite development stage.

Recent studies associated with other development sites have highlighted the importance of this local landscape to the rare Bechstein's bat and, as our knowledge has increased, it has become clear that standard survey methods (as used in previous works here) are simply not suited to establishing this species' presence at a site. I would expect any future bat surveys at this site to make use of upcoming new guidance on appropriate survey methods for this bat species (i.e. that trapping surveys are the only reliable method of identification) and I would anticipate that should the site be shown to be used by Bechstein's bats then amendments will be needed to mitigation measures. I would also strongly recommend that, if not already underway, surveys for Bechstein's bats are commenced at the earliest opportunity so as to provide an early 'heads-up' to any substantial constraints (e.g. an on-site maternity colony would be sufficient to require non-development of a particular area and the provision of significant mitigation land). The potential for Bechstein's bat to occur was raised in previous advice on this site in 2013.

I would ask whether the submitted Landscape Management Plan (Terra Firma, April 2015) has been reviewed by an ecologist – there may (or may not) be incompatibilities between standard

landscaping regimes and the requirements for non-managed areas containing significant ecological constraints. Some comment from the ecologist on the submitted lighting strategy would also be useful.

I also note that the March 2014 Atkins Habitat Management & Maintenance Plan is not actually appended to the Landscape Management Plan nor does it appear in the list of application documents. The Atkins report (available via the original application) is also a working document (complete with multiple track changes) which one would assume has been amended in the last year or more: it would be useful to see the latest iteration.

In summary, whilst the broad landscape measures for the site are acceptable, it is important to qualify any permission with the need to inform all phases of development through updating ecological survey. There is some clarification needed at this stage on the lighting strategy and whether an ecologist has seen the submitted landscape management plan.

I hope the above is useful – if you have any queries please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

**Senior Ecologist
Ecology Team**

Specialist Environment Services
Economy, Transport and Environment Department
Hampshire County Council
Elizabeth II Court West
The Castle, Winchester
Hampshire SO23 8UD
Direct Line: 01962 832335
E-mail: tristan.norton@hants.gov.uk; www.hants.gov.uk/biodiversity

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