

APP/14/00547 | Outline planning permission for 125 residential units and a water retention area. All matters reserved except access and levels | Land west of Horndean Road and south of Southleigh Road 14.1313

Thank you for consulting me on this application. In summary, I consider that clarification is required in respect to ecological constraints, notably that of bats. It would appear that the submitted bat assessment is lacking sufficient detail to enable a fully robust assessment of likely impact. The Habitat Creation and Management plan also appears to be missing.

The application is accompanied by a number of ecological reports: Summary Statement on Ecology (The Ecology Co-operation Ltd, 2014); Phase 1 Habitat Assessment (Azure Ecology, June 2013); Ecological Walkover Assessment (Azure Ecology, October 2013); Brent Goose Survey (Azure Ecology, March 2014); Reptile Survey (Azure Ecology, July 2013); Great Crested Newt Survey and Assessment (Azure Ecology, June 2013); Phase 2 vegetation Survey (Azure Ecology, September 2013); and a Bat Report (Azure Ecology, September 2013). I have reviewed each of these documents, as well as a number of others considered relevant to understanding the likely ecological constraints.

The application site comprises a moderately-sized area of predominantly arable farmland with areas of associated grassland field margin, scrub, woodland, mature trees, hedgerow and a pond. The vegetation communities on site are not considered to be of particular value but the mix of several habitats in a relatively limited site is of ecological interest.

Habitat Creation and Management plan

This document is referenced in the Summary Statement but does not appear anywhere within the submitted documents.

Bats

The application does not seem to include any kind of ecological desk-based assessment (although there is reference to one I cannot find any meaningful detail in any of the ecological reports). This is unfortunate as consultation with Hampshire Biodiversity Information Centre (HBIC) should have alerted the ecologist to the presence in the surrounding landscape of numerous recent records of the rare Bechstein's bat. This bat is present in nationally-significant numbers (perhaps internationally-significant) within the surrounding landscape and has been shown to occur (whilst foraging/commuting) within a range of non-woodland habitats. Roost sites (including substantial maternity roosts) have frequently included parkland trees within very open situations. Significant Bechstein's bat roosts have been recorded at locations c.1km distant (certainly within commuting distance for a bat) and so there should be acknowledgement that this species could very well occur within/in close proximity to the application site. I do not consider that a single bat survey, undertaken outside the key survey season, is adequate for understanding the value of the site for foraging/commuting bats: no site-wide activity survey appears to have been carried out for instance. Nor indeed is this survey adequate for assessing the presence/likely absence of roosting bats – each of

the five mature oak trees at the south-western corner has been surveyed once in mid-September, contrary to published survey guidance and the limitations section of the bat report even states that survey conditions were 'suboptimal'. I cannot see that the bat assessment for this site is adequate and recommend that additional effort is employed so that the potential for impacts can be assessed robustly.

Overwintering Birds

The Brent Goose report correctly identifies that the application site is listed within the 2010 Solent Waders & Brent Goose Strategy (SWBGS) as being of 'uncertain' value for overwintering birds. Such sites should therefore be subject to an appropriate level of survey effort in order that it can be established, with a sufficient degree of certainty, that birds are not likely to occur – i.e. the uncertainty needs to be reduced to an acceptable level by field survey works. In this case, the applicant's ecologists have carried out a full winter's worth of field survey (winter 2013/14) and supplemented this with survey data from the preceding winter (resulting from HCC surveys for Havant Borough Council). Therefore, the current assessment is based upon two consecutive winters' field survey effort and does provide sufficient confidence that the application site (and immediate surrounds) is not likely to be used by overwintering brent geese or waders. No additional survey effort is required.

Great Crested Newt (GCN)

Surveys were carried out during 2013 and no evidence of the species was recorded, despite suitable habitat. I am content to agree that GCN are not currently a constraint at this site and that further works are unnecessary. There may be some scope for pond management works (in order to enhance this important feature) although I would generally steer away from active management of existing waterbodies and instead recommend that a new one is established: this is a matter for the applicant however.

Reptiles

A very small population of common lizards (maximum of three individuals) was recorded within the site during survey in 2013. The site is of minimal value for reptile species and it should be straightforward to retain sufficient grassland habitat for this population of lizards to persist within the application site.

Summary

The site has been subject to a range of ecological surveys and, in general, the ecological constraints are understood to a satisfactory degree. However, the submitted bat survey is inadequate for assessing likely impact and needs to be revisited. There is also no detail of any proposed mitigation or enhancement measures. NPPF and Circular 06/2005 require that planning decisions (including outline) 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. In line with NPPF, Circular 06/2005 and Natural England Standing Advice, I would recommend that this information is required prior to further consideration of this application.

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

Kind regards,

Tristan

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