

Dear Aaron,

APP/13/00576 Demolition of existing 3 bed bungalow and construction of 4No. 4 bed detached houses, 3 with integral garages and 1 detached garage and associated parking and landscaping with access from Wedgewood Way. 53 Hart Plain Avenue, Waterloooville, PO8 8RG 13.1163

Thank you for consulting me on this application. I am now in receipt of some additional ecological information provide to you by the applicant. Based on the information provided within the Addendum report I am now content that sufficient ecological information has been provided.

The application is now accompanied by an 'Ecological Impact Assessment Addendum' report (The Environmental Project Consulting Group, 1st November 2013) which provides additional information in respect to the issues raised by me (in my consultation response dated 22nd October 2013) and by Natural England (comments dated 22nd October 2013).

My comments on this Addendum report are as follows:

Bats

I can find no evidence that survey works in relation to the previous application in 2006 found roosting bats, despite comments made by local residents and Natural England – the planning officer's report for that application makes specific reference to the fact that there were no ecological constraints, and ecology was not a reason for refusal in 2006. It may well be that there are/were roosting bats present within the large oak tree on site, but the current application makes it clear that no works to TPO trees will occur and thus there are no potential impacts to roosting bats from arboricultural works. Any works to such trees (e.g. cutting of ivy, removal of dead limbs etc.) must receive assent from the Local Planning Authority and, given the possibility of bats occurring here, I would expect Havant Borough Council to request that updating bat surveys are undertaken – this should include a full Phase 2 emergence survey where necessary (i.e. if impacts are anticipated). I also note that HBC's arboricultural officer has raised concerns in respect to the TPO tree's proximity to Plot 4 - he is concerned that future occupants could apply pressure to have this tree trimmed. Clearly this will only be possible once all necessary ecological constraints have been addressed via an application to work on a TPO tree. I am therefore content that this mechanism will ensure that bats are considered fully prior to any arboricultural works – the LPA and local residents are aware of the potential for bats to occur and that there is a correct procedure to follow should works be required.

With no direct impacts to the tree anticipated, there is the potential for its proximity to the proposed dwellings to result in indirect impacts from light spillage. Whilst it is not a prerequisite for applications to contain a detailed lighting plan, I would request that any such plan is first reviewed by HBC's ecologist so that any potential issues can be addressed. If you are minded to grant permission, could I suggest that such a measure is secured via a suitably-worded condition:

Prior to commencement, a scheme of lighting (for the period of construction and the operational life of the development), designed to minimise impacts on wildlife, particularly bats, shall be submitted to and approved in writing by the LPA. Thereafter the approved scheme shall be implemented. Reason: to minimise impacts of lighting on the ecological interest of the site.

Reptiles

The Addendum report contains details on the proposed reptile receptor site. This comprises an area of rough grassland situated within a privately-owned 'nature reserve' adjacent to Butser Hill National Nature Reserve. This site comprises suitable reptile habitat and has apparently been managed for reptiles since its 'recent' conversion from arable farmland. I am content that this receptor site provides suitable habitat which is likely to be able to accommodate the relatively small number of common reptile species recorded within the application site – the tussocky sward and presence of log piles will increase the site's carrying capacity for reptiles.

I am keen for the LPA to be kept informed of the efficacy of the proposed reptile translocation works and therefore would request that any consent includes a suitably-worded condition such as:

A brief report providing details of the reptile translocation exercise (methods used, number, sex and age-class of animals captured and transported) undertaken on site shall be submitted to the Local Planning Authority within 3 months of the final translocation visit.

Ecological Mitigation, Compensation and Enhancement

In line with national (NPPF) and local (HBC Local Plan Core Strategy) planning policy, new development should seek to minimise impacts on biodiversity and also utilise measures to compensate for impacts and enhance biodiversity through development. Whilst the proposed reptile mitigation measures will ensure that protected reptile species are not harmed, there is also an opportunity for the proposed development to incorporate ecological enhancement features such as bat boxes and bird boxes or species-rich native vegetation.

Therefore, if you are minded to grant permission, could I suggest that the ecological compensation and enhancement measures detailed within the ecology reports are secured via a suitably-worded condition, such as:

Development shall proceed in accordance with the ecological compensation and enhancement measures detailed within the 'Ecological Impact Assessment' report (The Environmental Project Consulting Group, September 2013) and the 'Ecological Impact Assessment Addendum' report (The Environmental Project Consulting Group, 1st November 2013) unless otherwise agreed in writing by the Local Planning Authority. Reason: to provide suitable biodiversity enhancements in line with NPPF and with Policy CS11 of the Havant Borough Local Plan Core Strategy.

I trust that the above is suitable - if you have any queries please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

**Senior Ecologist
Ecology Team**