

From: Norton, Tristan [REDACTED]
Sent: 21 January 2019 16:29
To: Haywood, Daphney [REDACTED]
Cc: Havant Planning and Development Mailbox New <planning.developmentnew@havant.gov.uk>
Subject: APP/18/01297 Manor Road Nurseries, Manor Road, Hayling Island, PO11 0QL 18.2555

Dear Daphney,

APP/18/01297 | Construction of 9No. three bed dwellings, following demolition of existing glasshouse, together with improved site access and associated vehicle parking. | Manor Road Nurseries, Manor Road, Hayling Island, PO11 0QL 18.2555

Thank you for consulting me on this application advice. Please accept my apologies for the long delay in responding to you.

The application is accompanied by an Initial Ecological Appraisal (EcoSupport, December 2018). The site itself is considered to be of limited ecological value, comprising an essentially bare site with much bare/cleared ground, a greenhouse, caravans, refuse, some improved grassland and a boundary hedgerow. In terms of on-site ecology I would not raise any concerns and suggest that an ecological mitigation and enhancement strategy is secured through condition: at present only mitigation measures are provided, not enhancements. The developing Havant Borough Local Plan 2036 will contain strong policy backing for ecological enhancements on every development site, and particularly those with multiple dwellings.

The site lies immediately south of the Solent Waders & Brent Goose site H49H. This is classified as a Primary Support Area within the SWBGS, meaning that it is considered to be of very high importance for supporting species associated with the nearby Chichester & Langstone Harbours SPA/Ramsar, in this case waders and brent geese. Residential development in such close proximity has the potential to result in visual and noise disturbance of SPA/Ramsar bird species, thereby undermining the conservation objectives of the SPA/Ramsar. New development in close proximity to supporting habitat may also render some areas of it unattractive for birds.

I suggest that the application should be accompanied by further detail in respect to SPA/Ramsar impacts, sufficient to meet the requirements of Habitats Regulations Assessment (a 'shadow' HRA). The potential impacts should be explored in greater detail and a deliverable avoidance/mitigation strategy provided. At present, it is proposed to submit a CEMP at some future stage: this is not an acceptable strategy for addressing impacts to European site supporting habitat.

As a starting point, the ecologist should review the recently-published SWBGS 'Guidance on mitigation and off-setting requirements' and provide comment on whether these measures apply or can be used as a basis for addressing the identified impacts. A CEMP will be one solution (thereby securing any mitigation requirements in terms of construction disturbance) but the impacts may extend into the operational phase also. Other measures may be necessary for the longer-term.

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

Kind regards,

Tristan

Tristan Norton

**Senior Ecologist
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