

From: Norton, Tristan <Tristan.Norton@havant.gov.uk>

Sent: 11 February 2026 15:30

To: Eaves, David <David.Eaves@havant.gov.uk>

Cc: Norton, Tristan <Tristan.Norton@havant.gov.uk>; Weaver, Louise <Louise.Weaver@havant.gov.uk>

Subject: APP/25/00639 | Erection of 90 dwellings with associated landscaping, parking and improved access. | Proposed Development site (former Electricity Board site), Bartons Road, Havant

Dear David,

APP/25/00639 | Erection of 90 dwellings with associated landscaping, parking and improved access. | Proposed Development site (former Electricity Board site), Bartons Road, Havant

Thank you for consulting me on this application. The application is accompanied by a Preliminary Ecological Appraisal (John Wenman, December 2025), an Invertebrate Survey (Matthew Smith, July 2025), a Biodiversity Net Gain Statutory Metric (John Wenman, July 2025 amended January 2026) and a Biodiversity Net Gain Assessment report (John Wenman, December 2025).

The site comprises an extensive area of formerly developed land that now contains a varied mix of dense scrub, tall herbage, open grassland and sparsely vegetated land (open mosaic habitat). The site is classic brownfield land. In terms of the site's potential for supporting protected and notable species, the invertebrate survey recorded a relatively low number of species and few species of conservation concern: it is concluded that the site is not a remarkable example of brownfield habitat for invertebrates. The site does offer some suitable habitat for foraging bats species, although the highly urbanised character of the wider area is likely to reduce suitability overall: however, bat species will be present locally and be likely to occur within the site on occasion. The trees and scrub within and around the site are suitable for supporting various bird species, and it is likely that small numbers of common and widespread 'garden' bird species will breed on site. There is some potential for common reptiles and mammal species such as Hedgehog. Overall, I am content that the potential impacts on protected and notable species have been assessed proportionately. A series of recommendations for impact avoidance and mitigation are provided and these are satisfactory.

The Biodiversity Net Gain assessment has been undertaken correctly. The submitted BNG metric calculations conclude that the proposed development will result in a habitat unit deficit of -6.97 which equates to -74.17%. The bulk of this deficit comprises medium and high distinctiveness habitats. Based on the submitted site layout, there is limited opportunity for addressing the habitat unit deficit on site – please note comments below on landscaping. The proposed landscaping on site contains relatively limited areas of created semi-natural habitat such as grassland and scrub. The key issue is the loss of the high distinctiveness Open Mosaic Habitat: this is a habitat type which must be compensated on a like-for-like basis. I am not aware of an off-site option for this habitat type within Havant Borough, and there are very limited options elsewhere, especially in southern England. This is an issue common to several development sites within the Borough.

The amended BNG calculations now include off-site measures at Halnaker Farm habitat bank in West Sussex. Habitat units to be purchased include 0.27 pond units, 3.6 mixed scrub units and 6.5 other neutral grassland units (all in moderate condition). The overall BNG gain for on- and off-site measures is 10.04%. Whilst I am content that there are available and deliverable off-site BNG habitats, the fact remains that the BNG trading rules are not being met – a high distinctiveness habitat is being replaced predominantly with lower distinctiveness habitats. It remains possible for the LPA to apply some flexibility to the BNG Metric rules. Rule 4 of the Metric states: ‘In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority’ and should be used ‘where there is a clear ecological justification that a proposal will deliver significant environmental benefits not fully captured by the metric tool’. I am content that the proposed habitat bank units will deliver nature recovery, albeit outside the borough. The LPA will need to see evidence that these units have been allocated to the development.

The above matters aside, I note continued comments from the Council’s Landscape consultee around the unsatisfactory site layout. Further discussion seems necessary to resolve these comments, and this may have an impact on the extent and type of landscaping and the potential for increased opportunities for on-site BNG habitats and ecological enhancements. I will be happy to provide further comment following any required amendments to the overall site layout. Given the substantial BNG unit deficit, it would seem prudent to maximise the potential for on-site BNG, and I don’t really see any issue with a more imaginative landscaping scheme that addresses the loss of OMH. Until such time as the landscaping deficiencies are resolved I must advise that the on-

site BNG situation remains provisional. The argument for accepting a Rule 4 circumstance becomes simpler once every opportunity for on-site BNG has been explored and, where justified, rejected. The off-site options are accepted as a good option but require the LPA to be very flexible with the interpretation of Rule 4.

Once the landscaping matters have been resolved, and if you are minded to grant permission, can I suggest that ecological measures are secured by the following conditions:

Development shall proceed in strict accordance with the ecological avoidance and mitigation measures detailed within the Preliminary Ecological Appraisal (John Wenman, December 2025), Biodiversity Net Gain Statutory Metric (John Wenman, July 2025 amended January 2026) and Biodiversity Net Gain Assessment report (John Wenman, December 2025). Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.

I would recommend that all BNG requirements are secured through condition. Recommended condition wording is provided below.

A Biodiversity Gain Plan shall be prepared in accordance with Biodiversity Net Gain Statutory Metric (John Wenman, July 2025 amended January 2026) and must include:

- (1) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat;*
- (2) the pre-development biodiversity value of the on-site habitat;*
- (3) the post-development biodiversity value of the on-site habitat;*
- (4) any registered off-site biodiversity gain allocated to the development and the value of that gain in relation to the development;*
- (5) any biodiversity credits purchased for the development; and*
- (6) any such other matters as the Secretary of State may by regulations specify.*

The development shall not commence until a Habitat Management and Monitoring Plan (HMMP), prepared in accordance with the approved Biodiversity Gain Plan, has been submitted to, and approved in writing by, the local planning authority. The HMMP shall include:

- (7) a non-technical summary;*
- (8) the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
- (9) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
- (10) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
- (11) the monitoring methodology and frequency in respect of the created or enhanced habitat.*

Notice in writing shall be given to the Council when the:

- (12) HMMP has been implemented; and*
- (13) habitat creation and enhancement works as set out in the HMMP have been completed.*

The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

Prior to the commencement of any development activities, a Construction Environment Management Plan (CEMP) shall be submitted to and approved in writing by the Local

Planning Authority. The CEMP shall include specific measures to avoid or mitigate impacts to ecological features (sites, habitats and species) as detailed within the Preliminary Ecological Appraisal (John Wenman, July 2025). The CEMP shall include details of ecological avoidance and mitigation processes and those persons responsible for implementing them. Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.

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

Kind regards,

Tristan

Tristan Norton

Principal Ecologist |