

Dear Bob,

APP/26/00324 | Outline planning application, with all matters reserved except for means of vehicular access to the public highway and associated highway improvements, for: the demolition of existing buildings; the erection of new residential dwellings (C3); a Local Centre (comprising local retail (E(a)), financial and professional services (E(c)(i), E(c)(ii), E(c)(iii)), restaurants, cafés, and drinking establishments (E(b) and Sui Generis), hot food takeaways (Sui Generis), medical services (E(e)), offices (E(g)(i)) and community facilities ((E(d)), E(f), F2(b), F2(c))); a Primary School (F1(a)); early years provision (E(f)); informal and formal public open space including community park; community food-growing space; Active Travel routes; drainage infrastructure; utilities infrastructure; and all other associated and necessary infrastructure. Accompanied by an Environmental Statement. | Land to the east of Denvilles, Havant, known as Southleigh

Thank you for consulting me on this application.

In particular, I have reviewed the following key documents submitted with this application:

- Design and Access Statement and Strategic Design Code (Bloor Homes, April 2026)
- Planning Statement (White Peak Planning, March 2026)
- Environmental Statement Volumes 1-3 (White Peak Planning, April 2026)
- ES Appendix 9.1 Ecological Baseline (EPR, March 2026)
- ES Appendix 9.2 Information for Habitats Regulations Assessment (EPR, March 2026)
- ES Appendix 9.3 Biodiversity Net Gain (EPR, March 2026)
- Biodiversity Net Gain Statutory Metric (EPR, March 2026)
- Framework Construction Environmental Management Plan (White Peak Planning, November 2025)

The application site is extensive and comprises a substantial area of open countryside containing a mix of arable farmland, permanent grassland, mature parkland, semi-natural and plantation woodland, individual trees, hedgerows, drainage ditches, waterbodies, and buildings. I can confirm that I have visited the site myself and am familiar with its current layout and habitat composition.

Overall, I consider the scope of ecological assessment carried out to date to be suitable. The full range of potential ecological features – habitats and species - has been assessed using recognised best practice survey methods at appropriate times of the year. Field surveys have been bolstered by detailed desk-based assessment. The methodologies used to assess the value of ecological features are clearly explained, with reference to national and local valuation metrics. Predicted impacts, their scale, and potential mitigating measures are summarised in Table 9.9 of ES Chapter 9 and further explored in the report discussion: these are acceptable. It is important to note that updating surveys will be expected for key ecological features prior to impactful works commencing – this is especially critical for bat species where a number of years will have elapsed between survey date and potential impacts occurring. I welcome the statement that updating survey and assessment will be carried out.

Habitats

A site of this size unsurprisingly contains habitats of varying ecological value, ranging from district to site importance.

- The key on-site habitat is the extensive area of parkland at the north-eastern end of the site. This area, whilst not botanically interesting in terms of its grassland, is nevertheless an important area of open habitat. The Oak trees within the parkland are of mature-to-veteran status and are a hugely important natural asset to the borough. The trees themselves will provide opportunities for numerous species including bats, birds, small mammals, and invertebrates, and provide an important shade resource. Other woodland parcels include Southleigh Copse and Eastleigh Copse, both of which are considered to be of 19th and 20th Century planted origin.
- Hedgerows and treelines across the site are of varied origin and biodiversity value. These range from lines of mature/veteran trees to modern, managed, species poor agricultural field boundary hedges. The overall network of

hedgerows and other woody boundaries is highly valuable, and some of the boundary hedges are notably species rich.

- The grassland across the site is generally of limited species richness, conforming mostly to the definition of agriculturally improved albeit with localised elements of species poor acid grassland, sometimes damp. There is a mix of grazed pasture, silage meadows, and cut field margins. I am content that none of the grassland is of particular botanical importance, although large expanses of grassland are clearly a valuable habitat resource and there are opportunities for retention and enhancement of grassland.
- The arable land on site – mostly restricted to the southern end – is generally of limited biodiversity value, although used by various bird species during the winter months. The field margins do not support a notable arable flora.
- There is a network of field drainage ditches across the site. These are generally steeply incised and with seasonal flows. Aquatic vegetation appears to be limited to common and widespread species. These ditches drain to the south and east, and enter the catchment of the West Brook which flows south just east of the site.

Habitat Impacts and Mitigation

Direct impacts to habitats have been quantified wherever possible, although this is within the context of an outline submission where there may well be future changes to layout that affect impact calculations. Current estimates for habitat loss include sizeable losses of grassland and hedgerows, whereas woodlands will be relatively less impacted. There will standard best practice mitigation measures applied during construction, and these can be detailed within a Construction Environment Management Plan (CEMP).

Direct losses of habitats are to be compensated through both new habitat creation, such as new hedgerows and species rich grassland, and through retained habitat enhancements. This includes a sizeable green/blue corridor along the eastern boundary, as well as a similar area along the southern boundary.

Bats

A comprehensive suite of bat surveys has been carried out, comprising ground-level building and tree assessments, building inspections, walked transects, automated monitoring, and trapping surveys. I am content with the level of survey effort deployed across several years and consider that the information gathered will provide a sound assessment of bat activity. I would highlight that updating bat surveys will be expected to support any reserved matters submissions, given the likely time that will have elapsed between the current survey data and any future submissions plus the potential for future layout changes. Discussion with the LPA over the requirements for updating surveys would be sensible.

The site is used by up to nine bat species, with activity unsurprisingly dominated by the commoner species. Scarcer species such as Western Barbastelle and Natterer's Bat are present. In terms of roosts, small roosts of common species are confirmed in Building B5 and Tree 423. Given the mobile nature of bat roosts, there is potential for other buildings and trees to support roosts in future years. The trapping surveys did not record the very rare Bechstein's Bat, a species known to occur locally and for which Havant borough has a particular responsibility. It is inevitable that Bechstein's Bats will occur within the parkland and more widely. Overall, such a large site containing a range of semi-natural habitats is clearly of value to local bat populations for foraging, commuting and social activities if not roosting.

This development will affect bats, which receive strict legal protection under UK law by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (commonly referred to as the Habitats Regulations). Where development affects a European protected species (EPS), permission can be granted unless the development is likely to result in a breach of the Habitats Regulations and is unlikely to be granted a licence from Natural England to allow the development to proceed under a derogation from the law.

- *Will the development result in a breach of the EU Directive?* Yes, the proposed development is likely to directly impact a bat roost.

- *Is the development unlikely to be licensed?*

An EPS licence can only be granted if the development proposal is able to meet three tests:

- 1) the consented operation must be for ‘preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment’; (Regulation 53(2)(e))*
- 2) there must be ‘no satisfactory alternative’ (Regulation 53(9)(a)); and*
- 3) the action authorised ‘will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range’ (Regulation 53(9)(b)).*

It is for you as the case officer to assess the proposals against the first two tests – you may wish to ask for further information from the applicant. If the development is ordinarily acceptable in planning terms, then the first two tests can be met. In order to assess the development against the third test, sufficient details must be available to show how killing / injury of bats will be avoided and how the loss or damage to bat roosts will be compensated. An outline mitigation and enhancement strategy has been provided, detailing specific measures to avoid harm to bats during development works and to provide compensatory roosts and enhancement features within the development. I would support these measures and, based on the information currently available, and if you are satisfied that the first two tests can be met, I am confident that the development is not unlikely to be licensed. I would recommend that LPA’s engagement with the Habitats Regulations is detailed in your report. It is for the applicant and their appointed agents to ensure that the requisite licence is obtained.

Badgers

No Badger setts were recorded within the site, and only limited evidence of general Badger activity. I am content to agree that Badgers are not at present a significant constraint at the site, although clearly this species has potential to move into previously unoccupied areas. No further information is necessary at this stage, although continued vigilance is required to assess presence in the future.

Hazel Dormice

No evidence of Hazel Dormice has been recorded within the site, and the species is considered absent. There are no records of this species from the immediate surrounding landscape, despite the presence of abundant suitable habitat. Given the survey effort deployed I am content to agree that this species is likely absent.

Birds

Wintering and breeding bird surveys have provided a robust assessment of bird activity across the site. The site does not support the key qualifying feature species of the nearby Solent Special Protection Areas, and the site is not included within the Solent waders & Brent Goose Strategy (SWBGS). A small number of Lapwings were observed on two occasions in winter 2025/26. Lapwing is part of the overall species assemblage noted for the Chichester & Langstone Harbours SPA. Other species observed during winter included a range of common and widespread species alongside more notable concentrations of some species including Common Starling (up to 230) and Common Snipe (up to 72).

The breeding bird assemblage across the site is again dominated by relatively widespread species, but also includes typical open countryside species such as Skylark (up to ten territories) and Whitethroat (up to five pairs). Farmland species such as Yellowhammer and Linnet were observed rarely, with no confirmed evidence of breeding. Barn Owl was observed foraging within the parkland, and although no evidence of breeding was noted I would consider it highly likely that this species breeds locally in a tree cavity or farm building somewhere.

Great Crested Newt

No evidence of Great Crested Newt was recorded following eDNA surveys of a number of suitable ponds, and this species is considered absent.

Reptiles

The site has been shown to support a population of Slow-worms and Common Lizards. Slow-worms are present in suitable grassy margin habitat across the site, although predominantly in the south and north. Only a single Common Lizard was observed.

Invertebrates

A rapid assessment of invertebrate habitat suitability was carried out. Detailed surveys recorded a total of 248 invertebrate species, including a number associated with decay, fungi, and sap runs within the old parkland.

Species Impact and Mitigation

Details of outline avoidance and mitigation measures for species are provided in ES Chapter 9, and I am content with the information presented. Full details of avoidance and mitigation for species can be secured through condition (see below) but I am satisfied that potential impacts have been considered at this stage and that proposed measures accord with expected standards. The overall approach to species mitigation is impact avoidance wherever possible and, where not possible, to ensure that the developed site incorporates substantial landscape elements that allow for continued species presence and movement. The key elements proposed are the retention and ongoing management of the parkland, the creation of biodiverse open space/surface drainage infrastructure to the south and east, and various habitat creation measures across the site.

Overall mitigation, compensation, and enhancement requirements

The proposed development will be a profound change to this landscape and will result in the loss of substantial areas of (albeit relatively limited value) open habitat, as well as the loss of significant areas of hedgerow and trees/shrubs. The proposed development will also facilitate fundamental changes in the extent and magnitude of human activity within a largely undisturbed site. The key guiding factors in terms of post-development biodiversity should be the retention and protection of the highest value habitats, the maintenance of landscape-scale permeability for species, the creation of new and enhancement of existing on-site habitats, and the provision of widespread ecological enhancements into the built environment.

I welcome the retention in full of the parkland to the north and its proposed use as public open space. There is ample opportunity here for grassland management to enhance the area's botanical richness (it is currently rather species poor grassland) and to create a truly extensive site of valuable semi-improved grassland managed for biodiversity. Management will require long-term investment in a cut-and-collect process or grazing to gradually develop a species rich sward that will benefit a broad range of wildlife and provide an attractive area for recreation. I would like to see further details of efforts to enhance the biodiversity value of the parkland grassland, and would

ideally wish to see a bespoke long-term management plan for this area that includes management of the trees and the inclusion of plantings to ensure continuity of future mature/veteran trees at the site.

Public accessibility brings risks, especially in relation to the mature/veteran trees and potential damage, and careful consideration will be needed to prevent damage to these invaluable natural heritage features. Given the anticipated increase in human presence within the parkland there may be increased pressure to manage risk from the trees – risk will need to be very carefully assessed, and I would strongly recommend that the biodiversity value of the parkland trees should be the primary management driver and that human activity around them should be managed first. Similarly, large open spaces will be a magnet for dog walking and so careful investment in management will be needed to ensure this does not become just another dog walking park. This may have to involve dog-free or lead-only areas, strictly enforced in order to prevent overall biodiversity loss and nuisance impacts to other users. Events such as park runs can also result in ecological damage due to trampling, disturbance, and litter: again, any such public uses will need to prevent impacts to the obvious biodiversity value of this area nor undermine management investment. The parkland should not simply become a busy park solely for the use of people: it is an irreplaceable landscape feature of high biodiversity significance.

I would recommend that an integrated green and blue infrastructure strategy is required. This should demonstrate how the proposed development will deliver a fully multi-layered strategy combining biodiversity, flood management, climate adaptation, and social value benefits. Natural England's Green Infrastructure Framework provides a useful template for expected standards.

There are opportunities for the site to help deliver elements of the Local Nature Recovery Strategy (LNRS) for Hampshire. In particular, the LNRS includes measures for parkland restoration, grassland enhancement, and watercourse buffer strips within the allocation site. Some of these elements are indeed included within the post-development habitat map in ES Appendix 9.3 Biodiversity Net Gain (EPR, March 2026), and are discussed in paragraphs 2.14-2.20 of this report. I welcome efforts to ensure that LNRS is being used to deliver elements of the overall post-development habitat mix.

A critical feature is to maintain strong north-south connections between the application site and surrounding area (specifically the parkland and the extensive woodland to the north, home to rare bat populations that commute across the landscape) to the largely undeveloped coastal hinterland at Warblington, south of the A27. I acknowledge that there are parcels of land just immediately south of the application site which are (as yet) undeveloped, including a cluster of pastures and hedgerows fringing the West Brook Stream north of the A27 and I welcome the inclusion of proposed open grassland and drainage features along the southern and south-eastern edges of the site, bordering these valuable semi-natural habitats. Again, these undeveloped areas of the application site should be primarily for biodiversity value rather than for unfettered public recreation and all its related disturbance factors. It is essential that ponds do not become accessible to dogs.

Aside from the aforementioned grassland enhancement within the parkland, I would wish to see efforts to enhance the value of any retained habitats throughout the site, especially grassland, ditches, hedgerows, and woodland. Woodlands in particular can benefit from targeted long-term management effort and visitor management, and given the addition of new housing there will undoubtedly be issues related to damage and disturbance in what are at present relatively quiet woodland parcels in private countryside. Managing disturbance pressure will be a key requirement for the future.

A system of sustainable drainage features across the site is the minimum expectation. These features – primarily comprising swales and attenuation basins/ponds and suitable buffer habitats – can add significantly to biodiversity, facilitate species movements, and ensure that residents and visitors have opportunities to experience nature-rich open spaces daily. The design of such features should take cues from the surrounding landscape in terms of species chosen for planting/seeding collections, and there may be opportunities to bolster particular species populations that are notable in the area. I would be happy to provide input to any sustainable drainage related condition wording.

New buildings should incorporate ecological enhancement features as a matter of routine. The number of new dwellings will allow for at-scale inclusion of integral bird nesting and bat roosting features and other elements, and the expectation is for ambitious numbers of such features. Section 9.7 of the ES Biodiversity chapter states that such features will be included at a rate equivalent to one per dwelling, which is welcome. The parkland, and other mature trees within the site, offer opportunities for e.g. Barn Owl nesting boxes and other bird and bat enhancement features.

Biodiversity Net Gain

In respect to Biodiversity Net Gain (BNG), the Statutory Metric has been completed and shows that the development will achieve a net increase of 24.66% in habitat units (97.57 habitat unit uplift), 13.12% in hedgerow units (6.94 unit uplift), and 102.12% in watercourse units (5.08 unit uplift). Maps 2a, 2b and 3 within the ES Appendix 9.3 Biodiversity Net Gain (EPR, March 2026) show the proposed post-development habitats.

Given the outline nature of the proposal there is clearly scope for these calculations to change, positively and negatively, and so I can only provide comment on what must be treated as provisional BNG post-development habitats for now. A site of this size clearly offers opportunities for at-scale habitat creation and enhancement with meaningful linkages within the site and to the wider landscape. BNG and the strategic significance benefits from the LNRS are powerful mechanisms for providing nature-led landscaping elements across this site. As BNG is essentially a post-permission process, I can state at this point that the baseline calculations presented are sound and that there is a pathway whereby the required BNG uplift is achievable for habitat, hedgerow, and watercourse units. I am very happy to engage with ongoing discussions around BNG, especially where this can deliver locally appropriate habitat types and LNRS measures.

Habitats Regulations Assessment

ES Appendix 9.2 Information for Habitats Regulations Assessment (EPR, March 2026) provides a sound and appropriate assessment of the potential impact pathways to various European sites within the predicted zone of influence of the proposed development. Each European site is subject to screening, impact pathways are identified, and mitigating measures are detailed. The report concludes that through a mix of bespoke avoidance and mitigation, and strategic level mitigation (recreational pressure, nutrient neutrality), potential adverse effects can be discounted. I consider the submitted assessment to be acceptable, and the conclusions can be used by Havant Borough Council for its own assessment as Competent Authority under the Habitats Regulations.

Suggested conditions

If you are minded to grant outline permission, can I suggest that the following conditions are included:

Prior to the commencement of any development activities, a Landscape and Ecological Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall be in accordance with the ecological avoidance, mitigation, enhancement, and management measures as detailed in the Environmental Statement Chapter 9 Biodiversity (EPR, March 2026), Biodiversity Net Gain Statutory Metric (EPR, March 2026), and ES Appendix 9.3: Biodiversity Net Gain (EPR, March 2026) unless otherwise agreed in writing by the Local Planning Authority. It shall include but not necessarily be restricted to: details of updating survey and assessment for critical species such as bats; full details of all on-site and off-site ecological avoidance and mitigation measures, to include locations, timings, methods, and responsibilities; full details of all habitat and species compensation and enhancement measures, including location, composition, establishment and ongoing management, monitoring, and responsibilities. Reason: to provide ecological protection and enhancement 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.

Prior to the commencement of any development activities, a Construction Environment Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall include specific measures to avoid or mitigate potential impact pathways during construction affecting identified ecological features on-site and off-site including international designated sites and their interest features and should include roles, responsibilities and methods for each specific avoidance and mitigation measure. Reason: to protect biodiversity in accordance with the Environment Act 2021, Habitats Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.

Prior to the commencement of development activities, a Lighting Strategy shall be submitted to and approved by the Local Planning Authority. The Lighting Strategy shall include lux contour plans on the horizontal and vertical planes as necessary, and shall demonstrate how the proposed development will avoid and minimise the impacts of artificial lighting on bats and other nocturnal and crepuscular species. The Lighting Strategy shall be used to inform site layout and landscaping. Reason: to protect biodiversity in accordance with the Environment Act 2021, Habitats Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.

A Biodiversity Gain Plan shall be prepared in accordance with the Biodiversity Net Gain Statutory Metric (EPR, March 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.

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

Kind regards,

Tristan

Tristan Norton

Principal Ecologist | E: tristan.norton@havant.gov.uk M: 07552 248974

Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX