

APP/26/00587 | Landscaping improvements to strengthen the boundary of the common, providing a more secure deterrent for keeping vehicles out. Comprising low soil mounds, stone boulders, metal barriers and associated planting and seeding for biodiversity. | Stockheath Common, Stockheath Lane, Havant

Thank you for consulting me on this application, which is accompanied by a Biodiversity Net Gain (BNG) Strategy and a Biodiversity Net Gain Statutory Metric (both Enims, April 2026).

Overall, I am content that this proposal would both serve its intended purpose of site security alongside providing additional biodiversity benefits on what is already a significant wildlife site in the borough. The proposal entails the installation of a shallow bank and a number of limestone blocks. This will be accompanied by an area of new native tree/shrub planting as well as a modified mowing regime for areas of grassland. I have concerns about these proposals.

On the matter of BNG strategic significance, I am not sure that the conclusions drawn in section 3.1 of the BNG Strategy report are correct. Stockheath Common is a Site of Importance for Nature Conservation (SINC) and appears on the Hampshire Local Nature Recovery Strategy (LNRS) 'measures' map. As such, any post-intervention habitats should be accorded High strategic significance in the BNG Metric (see Table 7 of the Statutory Metric User Guidance). The specific measures for Stockheath Common include enhancement of grassland habitat. The fact that the site is within the LNRS measures layer means that the post-intervention calculations need revising – this is likely to be of benefit to the applicant as the proposal will help deliver identified LNRS measures on a SINC. It is essential that the BNG process is correct, even if the overall outcome is likely to be similar or improved. Given that the outcome here is more positive (i.e. the post-intervention scores are actually higher than those calculated) I do not consider that any additional information is required for this application.

If you are minded to grant permission, can I suggest the following condition wording:

Development shall proceed in accordance with the ecological mitigation, compensation, and enhancement measures as detailed in the Biodiversity Net Gain (BNG) Strategy, Biodiversity Net Gain Statutory Metric (both Enims, April 2026) and Landscape Proposals plan (Portsmouth City Council February 2026) unless otherwise agreed in writing by the Local Planning Authority. Reason: to provide ecological 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.

The BNG process – specifically the submission of a Biodiversity Gain Plan prior to commencement - is covered by a deemed condition, although the following suggested condition may assist in setting out the expectations for BNG submissions.

- *Unless otherwise approved in writing by the Local Planning Authority, a Biodiversity Gain Plan shall be prepared in accordance with the Biodiversity Net Gain (BNG) Strategy and a Biodiversity Net Gain Statutory Metric (both Enims, April 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:*

(a) HMMP has been implemented; and

(b) 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: In the interest of securing and monitoring biodiversity net gain (BNG) and policies CS11, CS16 and DM8 of the Havant Borough Local Plan (Core Strategy) 2011, the National Planning Policy Framework and 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