

Ecology comments 26.11.20

Dear Rachael,

P/17/0845/OA - Brook Lane Land to the east of Warsash - Outline Planning Permission With All Matters Reserved (Except For Access) For Residential Development Of Up To 180 Dwellings , Associated Landscaping Amenity Areas & Access From Brook Lane.

Thank you for re-consulting me on this planning application and apologies for the delay in responding. I have a number of concerns in relation to the updated survey work.

A final consultation response was issued on 24 October 2017 and it was agreed that the ecological concerns had been addressed and provided that a number of measures are secured through planning conditions, any adverse impacts as a result of the proposals could be offset/minimised. However, due to the time lapsed since the previous survey work, it was requested that updated surveys, where necessary, are carried out to identify any changes in the habitats, protected species populations and the requirement for additional mitigation.

The submitted Ecology Addendum by Ecosupport has combined two separate applications (P/18/0590/OA & P/17/0845/OA). It has been confirmed that there are no significant changes to the habitats on site compared to those recorded during the previous surveys.

No updated bat activity surveys have been carried out. Provided that a sensitive lighting strategy is designed (secured via a condition) and the green areas as shown in the Outline Landscape Strategy Plan (Drawing no. DD126.L01) are kept dark (<1 lux), then I raise no concerns.

No updated reptile surveys have been undertaken. It has however been justified that due to the size of the proposed off-site receptor site (approximately 3.3ha), even if the population has increased, the receptor site would still have sufficient carrying capacity. This is acceptable.

The addendum states that *"It will also be necessary to carry out an updated ground level roost assessment of all trees proposed for removal and some of these will likely require updating survey work."* It is not clear if this statement is relevant to this application or P/18/0590/OA. If the former, then this is not acceptable, as the lack of survey information will result in the LPA being unable to engage with the Habitats Regulations. Therefore, all trees to be removed should be subject to a ground level assessment and further emergence surveys, where required, to establish the presence/absence of roosting bats. It is also stated that the structures on site have been subject to a single updated bat survey in September to confirm if the status of the buildings on site have changed since the previous survey work. The provided results are rather confusing and it is requested that the submitted report is revised. Table 2 states that on 22 September, a common pipistrelle re-entry was recorded at Building 7, but the text in the Addendum states that the updated survey work has confirmed the absence of any roosting bats within the buildings assessed.

Despite originally confirming that the wooded area in the north, as circled in red below, will be fully retention and enhancement, it is now understood that this may not be the case, with a number of trees proposed for felling and therefore an avenue of trees being kept instead (losing woodland functionality). Whilst a Planning Condition (Condition 21) was imposed requesting that the details of the proposed compensation and mitigation as a result of loss of any woodland to be submitted, due to the difficulty of identifying offsite areas for compensation, further information is required at this stage in relation to the options explored so far in compensating for partial loss of this woodland on site.



Due to the loss of a number of habitats on site and to ensure not only no net loss in biodiversity but a net gain as a result of the proposals, it is requested that the Defra metric 2.0 is used and the calculations submitted to the LPA to confirm this point and ensure that the proposals are in line with the NPPF.

It is understood that the updated walkover identified that a number of the existing badger setts have expanded in size, with one of setts now used as a main sett. The submitted Ecology Addendum states that the setts should be monitored and depending on the results of the monitoring surveys, updated bait marking surveys and alterations to the layout may be required to accommodate for the use of the site by another clan. In the absence of this information, unfortunately the LPA is unable to confirm that the adverse impacts on badgers as a result of the proposals have been satisfactorily addressed and therefore further survey work and mitigation will be required.

Based on the above, further survey work for bats and badgers will be required, along with the calculations for the Biodiversity Metric 2.0 and further information in relation to the partial loss of the woodland in the north.

Please do not hesitate to contact me if you require further information.

Kind regards,
Maral