

APPLICATION No: P/18/1073/FP

APPEAL REF: APP/A1720/W/21/3271412



Town and Country Planning Act 1990

Appeal by Foreman Homes Ltd.

Land south of Romsey Avenue, Portchester, Hants.

**LPA ECOLOGY WITNESS PROOF OF EVIDENCE REBUTTAL:
“ON SITE” ECOLOGY & NATURE CONSERVATION**

Mr Adam Day, BSc (Hons), MSc, ACIEEM

July 2021

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RELEVANT DOCUMENTS TO CONSIDER IN CONJUNCTION

ENVIRONMENTAL STATEMENT (ES) CHAPTER 10: ECOLOGY AND BIODIVERSITY INCLUDING THE FOLLOWING APPENDICES;

- F1: FPCR ECOLOGY SURVEY 2021
- F2: 2018 ECOSUPPORT SURVEY RESULTS
- F3: PHASE 1 HABITAT PLAN
- F4: BIODIVERSITY MITIGATION AND ENHANCEMENT PLAN
- F5: 2020 BRENT GOOSE MITIGATION PLAN
- F6: BIODIVERSITY NET GAIN ASSESSMENT
- F7: SHADOW HRA

FRAMEWORK LANDSCAPE & ECOLOGICAL SPECIFICATION & MANAGEMENT PLAN

FRAMEWORK CONSTRUCTION TRAFFIC ENVIRONMENTAL MANAGEMENT PLAN (STEWART MICHAEL ASSOCIATES, JUNE 2021)

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DECLARATION

“The evidence which I have prepared and provide for this appeal reference P/18/1073/FP is true and has been prepared and is given in accordance with guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions”.

1.0 INTRODUCTION

Rebuttal statement

- 1.1 This rebuttal statement has been prepared in response to the Ecology Proof of Evidence provided by Mr Nicholas Sibbett, Ecology Witness, on behalf of Fareham Borough Council in July 2021.
- 1.2 The aim of this document is to provide further information in regard to objections raised in Mr Sibbett's proof and aid him in an update assessment of the "on-site" ecology matters. Each objection is referenced and addressed individually herewith.

2.0 REASONS FOR REBUTTAL

Reason for refusal b

Badgers

- 2.1 Whilst reason for refusal b does not directly deal with "on-site" ecology, Mr Sibbett has included a statement regarding badgers in this section of his proof. Paragraph 5.24 of the proof states the following;

"5.24 A badger sett within the south-east corner of the mitigation area will be retained in the site (Revised ES chapter 10, para 10.6.7). Security fencing would fence the badgers into the bird reserve, thus significantly hindering the badgers' ability to forage widely and possibly resulting in starvation in difficult seasons. Of course, having read this, the appellant may offer to dig holes under the security fence to allow the badgers to pass through to the wider area. By doing so, the fence would then become permeable to smaller dogs, which would be a source of disturbance in itself and which would also provide an incentive to owners to cut open the fence to be able to enter to retrieve their dog".

- 2.2 Whilst the badger sett does fall within the boundary of the site, the sett itself is within the hedgerow that runs west to east along the southern boundary (see appendix B) and is not present within the proposed brent goose reserve area. The sett will be fenced outside of the reserve. To make this clear and outline suitable mitigation to protect badgers during fencing works, the Framework Landscape Environmental Management Plan fLEMP document has been updated (Paragraphs 5.37 to 5.39).

Reason for refusal d-protected species

Ongoing surveys

- 2.3 Reason for refusal d concerns "on-site" ecology matters relating to protected species. The first section of Mr Sibbett's proof concerns ongoing site surveys. Paras 6.2 and 6.3 of the proof read as follows;

"6.2 The revised ES, Chapter 10, paras 10.3.26, 10.3.27, 10.3.28, explains that the main survey data for habitats and species from 2014-2018 is now out of date and that bat activity surveys and dormouse surveys are ongoing. The Court has held that a decision to grant permission must be taken in full knowledge of the likely significant effects of a project for the EIA regulations to be

complied with (e.g. R v Cornwall County Council ex parte Jill Hardy [2001] Env LR 25) (Core Document CDK.12).

6.3 In this case, significant gaps remain and the Inspector is unable to evaluate all likely significant effects of the appeal proposal or the extent to which they can be effectively mitigated until the survey work is complete. The choice is to defer the decision until the surveys are complete and the implications are included in an updated ES, or to refuse the appeal on the grounds of incomplete information”.

- 2.4 Mr Sibbett’s rejection relates to dormouse and bat survey data being out of date and whilst being updated currently to ensure there is no risk of delays at Reserved Matters, suggests there is a lack of suitable information to meet the EIA regulations in regard to likely significant effects. Deferring a decision on this basis would be disproportionate and the ES Chapter shows in sections 10.3.30 to 10.3.34 that the updated ecological assessment is compliant with the CIEEM guidelines for survey data validity (CIEEM, 2019).
- 2.5 The full bat and dormouse surveys were conducted in 2017, and were completed in October that year. The full surveys are therefore three to four years old as of the summer of 2021, with a May 2021 baseline check for bat activity surveys providing an update for the ES chapter as well as updated baseline habitat surveys. There is sufficient information from the previous and 2020/21 update surveys for full knowledge of the likely significant effects, and there are several reasons why this is the case.
- 2.6 For bats, the Site lacks optimal bat foraging/commuting habitat and roost features due to the sterile intensive arable nature of the Site, and low activity was confirmed by the 2017 and 2021 surveys. Dormice were not recorded during the 2017 surveys, and as they were absent from local records within 2.5km, and no arboreal connectivity to those populations exist, they therefore are unlikely to be present now. There has also been a lack of change to the baseline habitats and their condition on the Site as determined by the updated phase 1 habitat surveys in 2020 and 2021, and the proposed enhancements will significantly increase bat foraging opportunities on site (see 10.6.27 of Chapter 10 of the ES and paragraphs 6.4-6.6). There will be a significant increase in species-rich native hedgerow habitat on site, that will benefit connectivity in the area and increase dormouse opportunities in long-term.
- 2.7 For dormice, even in the unlikely event dormice were recorded prior to Reserved Matters, given the lack of dormouse habitat to be removed, the scheme is not likely to require an EPS Mitigation Licence to legitimise the works and if it was, due to unforeseen circumstances that led to hedgerow removal, there is sufficient enhancements and scope in the masterplan that any hedgerow removal and the scheme overall will be licensable.
- 2.8 The LPA Ecologist in their assessment during the consultation stage (Hampshire County Council consultation response, 5th October 2018, Appendix A) “raised no concerns” regarding bats due to the retention of all suitable bat habitat features in green infrastructure along the sites boundaries and was satisfied that dormice are not present. As these habitats remain retained, and have since that LPA response been further enhanced with subsequent masterplan updates, it can be stated with confidence the proposed development will benefit bats and provide improved connectivity and habitat for dormice.

Badgers

- 2.9 Paragraphs 6.4 and 6.5 of reason for refusal d, raise concerns regarding badgers. These are dealt with individually as follows;

“6.4 The assessment of impacts upon badgers has not considered the impacts on this species of the adjacent residential development to the east, constructed recently under outline permission 15/0260 and subsequent Reserved Matters. The badger sett in this site was planned to be closed with a replacement sett provided, according to the ecology report¹ provided with the outline application. This report is included as Core Document CDH.10. The group of badgers which uses that sett is the same group of badgers which uses the sett on the appeal site (Revised ES chapter 10, para 10.4.20). The current status of the badger group is unknown, and impacts of works on adjacent land might make the colony unviable cumulatively with the appeal proposals. Further and detailed study of the badger group is necessary to be able to understand impacts.

- 2.10 Paragraph 6.4 suggests that cumulative impacts on the badger population present within the land surrounding the Romsey Avenue proposals and adjacent now constructed development have not been considered. Approximately 11.2 hectares of sub-optimal badger foraging habitat will be lost to the developed area and Brent Goose Reserve. The substantial green infrastructure proposals for the Site, including 1.4 hectares of semi-improved grassland will provide a net gain in suitable badger foraging habitat within the area over the existing arable field.

- 2.11 Permeability of the local environment for badgers will be maintained through the eastern and western boundary hedgerows of the site. Overall connectivity is maintained through the retention of the southern hedgerow and arable field to the south of the site, which connects to the offsite woodland in the southwestern corner and western hedgerow boundary of the site. This provides connectivity to the green infrastructure in the west of the proposals.

6.5 The badger sett, which is within the south-east corner of the mitigation area will be retained in the site (Revised ES chapter 10, para 10.6.7) [if the badgers persist despite cumulative impacts]. Security fencing would fence the badgers into the bird reserve, thus significantly hindering the badgers’ ability to forage widely and possibly resulting in starvation in a difficult season. If the appellant offers to dig holes under the security fence or provide badger gates to allow the badgers to leave the bird reserve, the fence would then become permeable to smaller dogs. This would provide an incentive to dog owners to cut open the fence 1 Lyndsey Carrington Ecological Services (August 2016 updated November 2016) Ecological Construction and Management Plan Land at Cranleigh Road Fareham. 34 to be able to enter to retrieve their dog and compromise the function of the fence as a barrier”.

- 2.12 The Romsey Avenue proposals will not result in the loss of any badger setts as confirmed in paragraph 2.2 of this statement, the annex badger sett will be fenced outside of the proposed Brent Goose Reserve and is therefore retained.

Other Habitats Regulations matters

Nitrogen neutrality calculation error

- 2.13 Paragraphs 8.2-8.3 of Mr Sibbett’s proof raises an issue regarding miscalculations in the appellants nitrogen budget as described below;

“8.2 To aid the Inspector in her appropriate assessment in relation to nutrient neutrality, I would like to point out an error in the appellant’s calculations. The nutrient budget calculations were provided as part of the planning application, dated 4th August 2020. In stage 3 of the calculations, on the second page, it identifies 4.5ha of ‘nature reserve’ land being proposed. ‘Nature Reserve’ land provides a nominal output of 5kg of nitrogen leaching per hectare per year, according to Natural England’s latest guidance of June 2020 (Core Document CDH.4), its paragraphs 4.62 and 4.63. The bird reserve is however designed to be a nutrient rich grassland, with nutrient input coming from clover rather than artificial fertilizer. Nitrogen leaching will be greater than that of ‘nature reserve’ with a classification of lowland grazing being more appropriate. ‘Lowland grazing’ produces nitrogen at 13.0kg/ha/year according to NE’s guidance (paragraph 4.47).

- 2.14 *8.3 Since the ‘Lowland grazing’ figure is lower than the 31.2kg/ha/year figure for ‘Cereals’ for the current land use (NE guidance para 4.47) the total nitrogen budget for the proposed development remains negative (albeit less strongly negative than under the appellant’s calculation), with no requirement for mitigation to avoid an adverse effect on the integrity of any European site. However, to avoid any risk of erroneous information being used to 39 inform the HRA for the current proposal, or future HRAs for alternative proposals, it is recommended that the Inspector uses the correct land use types for her work”.*
- 2.15 This miscalculation was discussed prior to Adam Day’s “on-site” ecology proof being submitted, which included an updated calculation for the nitrogen budget, considering the brent goose reserve grassland reserve area as lowland grazing rather than a nature reserve, resulting in a final figure consistent with Mr Sibbett’s calculation. This was provided to Mr Sibbett who confirmed it’s receipt by email on 19th July 2021.

Analysis of the framework Landscape & Ecological Specification & Management Plan

Copy and paste errors

- 2.16 Mr Sibbet correctly highlights some copy and paste errors in the fLEMP document in paragraph 9.1 and 9.4. Any references to habitats not included in the proposals have been removed. With regard to the mention of bodies of water and steep slopes that Mr Sibbet mentions, these are from paragraph 1.7 of the fLEMP. This paragraph considers general health and safety for all sites and is not directly related to the proposals. Therefore, Mr Sibbett’s statement regarding this not being relevant is not correct.

Biodiversity Net Gain achievement

- 2.17 Paragraph 9.2 of Mr Sibbet’s proof questions the suitability of the meadow grassland buffer proposed in the brent goose reserve to achieve 10% net gain;
- “9.2 The LEMP seeks to address the BNG score of 5.95% in the revised ES (its para 1.3), suggesting (Chapter 3) that modifications could be made to achieve a +10.04% BNG, which would comply with Policy NE2 of the emerging Local Plan. A revised ES Appendix F6 Rev B was provided on 14th July 2021 which shows the use of lower nutrient grassland in a 7m wide band along two sides of the Waders and Brent Goose Mitigation Area. This grassland type replaces some of the nutrient-rich grassland with lower nutrient grassland of lesser value to Brent Geese along field margins. The area of this changed grassland may be in the region of 0.2ha according to my rough estimate. The impact of this change of area on the value of the mitigation area for Brent Geese has*

not been assessed but it is reasonable to consider that the value of the site for Brent geese would be reduced".

- 2.18 The management prescription for this grassland buffer would ensure that the sward height was low enough to be attractive to geese during the winter months. It is also important to highlight that the submitted LEMP is "framework" to support an outline application. There is significant scope to achieve a 10% net gain elsewhere within the development, including the permanent wetting of SuDS features, or through creating more features within green infrastructure.

Brent goose reserve habitat creation

- 2.19 In paragraph 9.3 of Mr Sibbet's proof, he makes reference to the initial creation of the improved grassland within the Brent goose reserve being incorrect, whilst also suggesting public access is possible due to the methods for preventing public damage of the grassland being included;

"9.3 The Improved Grassland seed mix described in the LEMP paragraph 5.6 specifies an Emorsgate seed mix which I cannot find with that name on the Emorsgate website at www.wildseed.co.uk. In paragraph 5.8 it describes that seed mix as having 'many perennial species', contradicting 41 the Revised ES chapter 10, paragraph 10.6.40 which suggests that just dominant clover and perennial rye grass would be planted. The LEMP species mix, although unclearly specified, seems to be inadequate compared to the previous ES proposals. The LEMP seed mix apparently will take 12 – 18 months to knit together as turf (LEMP para 5.8) thus adding a delay to the construction start; the Revised ES chapter 10 para 10.6.6 points out that the bird mitigation reserve should be in place before residential construction commences. The LEMP also commits to protect the seed mix for the bird mitigation reserve from seedling destruction by pedestrians (LEMP paras 5.8 and 5.16), which appears inconsistent with the bird reserve being closed to the public as proposed in the revised ES".

- 2.20 This again relates to a copy and paste error and has been corrected in the updated fLEMP (paragraphs 5.6 and 5.7), with the correct establishment and management methods prescribed.

**APPENDIX A: HAMPSHIRE COUNTY COUNCIL CONSULTATION RESPONSE,
5TH OCTOBER 2018**

From: Miri, Maral [<mailto:Maral.Miri@hants.gov.uk>]

Sent: 05 October 2018 08:56

To: Wright, Richard <RWright@Fareham.Gov.UK>

Subject: P/18/1073/FP - Land to the South of Romsey Avenue Fareham

Dear Richard,

P/18/1073/FP - Land to the South of Romsey Avenue Fareham - Hybrid Planning Application For Residential Development Of 225 Dwellings And Bird Conservation Area, Seeking Full Planning Permission For 58 Dwellings And Outline Planning Permission For 167 Dwellings With All Matters Reserved Except For Access

Thank you for consulting me on this application which is supported by an Ecological Impact Assessment (EclA) report, Reptile Survey & Mitigation Strategy and, Proposal for Bird Conservation Area by Ecosupport (May 2018). In summary, the proposed mitigation in relation to the loss of a Solent Waders and Brent Goose Strategy 'Primary Support Area' is not considered to be sufficient and further justification is required. Furthermore, the submitted EclA report lacks the level of detail required at this stage. As Portsmouth Harbour Special Protection Area (SPA) and Ramsar is located 180m to the south-west of the site and as loss of a primary supportive habitat for SPA birds is considered to be one the main Likely Significant Effects at the Screening Stage, it is necessary to proceed to the Appropriate Assessment Stage. Unfortunately, sufficient information has not been submitted to enable the LPA to confidently conclude that the impact on SPA birds as a result of the loss of Primary Support Area for SPA birds can be mitigated. It is therefore necessary to request the applicant's ecologist to provide further information.

The site comprises an arable field with an unmanaged improved grass strip along the northern boundary, scrub and hedgerows / tree lines.

Reptiles

A reptile survey was carried out between April – May 2017 and confirmed the presence of a 'Good' population of slow worms, with the majority of the reptiles found within the northern boundary of the site to the rear of existing houses. I would strongly suggest that Section 2.3 of the report is amended as it states that a low population of slow worm and grass snake is present on site. I assume this is a typo and any reports submitted as part of a planning application should be accurate.

Based on the latest site layout, the report states that approximately 850m² of reptile habitat will be lost, which will be compensated by a 2m wide rough grassland buffer along the eastern boundary and wider areas along the south-eastern boundary of the site. The report states that the anticipated area of the receptor habitat will be approx.. 1400 m². Whilst further information is required to demonstrate how the reptile receptor area will be delivered (e.g. proximity of the NEAP in the south-east to the receptor area, installation of a wooden knee rail to separate the receptor areas, etc.), I acknowledge that the majority of the site is at Outline Stage, the Illustrative Landscape Masterplan (Drawing no: DD151L01, Deacon Design) is only indicative and there appears to be sufficient areas in the south and east which could be used as a reptile receptor site. Therefore, I raise no major concerns at this stage, provided that detailed information at Reserved Matters stage is provided to ensure the long term suitability of the proposed reptile receptor areas.

Badgers

An annex sett has been recorded in the south-eastern corner of the site. Whilst the measures to protect the badgers during the construction phase is acceptable (e.g. erection of fencing to prevent accidental damage, covering excavations and open pipes, etc.), the operational phase impacts have not been assessed. For instance, it is not evident how far the proposed NEAP is from the retained badger sett and if close proximity to this area will result in increased disturbance to badgers. Therefore, further clarification is required.

Bats

The activity surveys between April and September 2017 confirmed that the site gets used by at least 6 species of bats for foraging and commuting (common and soprano pipistrelle, noctule, serotine, brown long-eared and Myotis species), with the northern, south-eastern and southern boundary hedgerow / tree line being most frequently used. As the majority of these areas are proposed for retention, subject to a sensitive lighting strategy, I raise no concerns.

It is understood that only the row of mature ash along the south-western boundary will be removal to enhance the sight lines for waders and Brent geese. These have been assessed as low and negligible potential for bats. Provided that the trees with low potential are soft-felled and any additional trees due for removal are assessed appropriately, I do not consider roosting bats to be a constraint in relation to this development.

Dormice

The surveys in 2017 did not record the presence of dormice on site.

Brent Geese and Wading Birds

The entire site is a Solent Waders and Brent Goose (SW&BG) Strategy 'Primary Support Area' (F21). The Primary Support Areas are land that, when in suitable management, make an important contribution to the function of the Solent wader and Brent goose ecological network. There will be a requirement for the off-setting area, in this case the western section of the site, to fulfil the same special contribution and particular function of the areas lost or damaged for the same species of birds. The appropriateness of any off-setting areas in respect of fulfilling the required ecological function should be judged against a number of criteria. Based on this, I do not consider that sufficient information has been provided to enable the LPA to assess the suitability of the off-setting area. My detailed comments are set out below:

- Habitat Type – The application site is understood to be an arable field which is to be replaced with short amenity grassland with scrapes in the south which is acceptable.
- Disturbance – installation of fencing and a ditch has been proposed to offset disturbance from recreational use and unmanaged public access which is acceptable.
- Area of habitat – *'where the replacement habitat would be of equal ecological quality the area required should be of a similar extent to the site being lost or damaged. There may be situations however, where a greater area is required when habitat created may be of poorer quality to that lost or damaged, or there is a high level of risk involved. Similarly, if significant ecological enhancements are possible that increase the carrying capacity of the replacement site above that of the Primary Support Area affected then a smaller area of replacement habitat might be acceptable. This might include the partial loss of a Primary Support Area providing the remainder can be made significantly improved in habitat quality with long term management so as to provide for a greater capacity for the target species than the original site. In all such cases the test will be to ensure the replacement habitats provide a clear and permanent net gain for the target species.'* Our survey work in 2013 and 2014 shows that approx. 300 Brent geese were recorded, mainly feeding in the centre of the site. Waders such as oystercatchers and curlews were also recorded mainly to the west, as these areas were recorded to be flooded in the winter. It is understood that the

entire application site measures 12.55ha, whilst the allocated Bird Conservation Area is approximately 2.8ha. This equates to a 78% reduction in 'Primary Support Area'. No justification has been provided in the submitted ecological reports as to how the area of habitat for Brent Geese and Waders was calculated. If the proposed habitat for the Bird Conservation Area is considered to be of higher quality, how will this increase its carrying capacity to the extent to compensate for the loss of the majority of the existing suitable habitat? How will an area of 2.8ha support over 300 individual Brent geese and a smaller number of waders?

- Timing and availability of habitat – the submitted ecology report states that '*Construction of the Bird Conservation Area will commence at the earliest opportunity to enable this area to be in place prior to first occupation of the housing development*'. This is not acceptable. The proposed Bird Conservation Area should be operational 'in time' to offset the adverse effects, with evidence to show it is functioning and readily available to SPA birds prior to any loss or damage to the original site. Therefore, the Bird Conservation Area should be available prior to any habitat disturbance/loss in the eastern section of the site. This means the Bird Conservation Area should be functional from October, with surveys informing if the provided habitat is functioning in supporting similar numbers of Brent geese and waders, prior to any works damaging or destroying the habitats in the eastern section of the site.
- Geographic location – this criteria is met as an onsite off-setting area has been selected. However, I have concerns in relation to the presence of housing in the north and east of the proposed Bird Conservation Area and the impact this would have on the suitability of the proposed area.

Impact Assessment

Paragraph 6.1.2 of the EclA report fails to provide a meaningful impact assessment on the construction phase generated noise. It is worth noting that noise during construction phase is not solely related to vegetation clearance but also construction activities (e.g. piling, drilling, excavations, etc.) and machinery will also be producing noise. Therefore, impact assessment on the sensitive receptors of the site, of most note SPA birds using the Primary Support Area should be included in this section.

Operational Phase impacts on the retained annex badger sett has not been included in the EclA report.

Cumulative Impacts

The submitted EclA lacks a Cumulative Impact Assessment section. For instance the east of the habitats immediately to the east as part of a separate planning application (Cranleigh Road). Reasonable effort should also be made to identify any likely future developments in the area. For instance, it is understood that the land to the south of the application site may come forward for planning which is also a Primary Support Area. Therefore any further future reductions in the available area to Brent geese and waders as part of the network of the sites supporting the SPA birds should be assessed.

Designated Sites

Portsmouth Harbour Special Protection Area (SPA), Ramsar and Site of Special Scientific Importance (SSSI) is located 180m to the south-west of the site. In April 2018, the Court of Justice of the European Union published a ruling in the Case C323/17 ('People Over Wind') with regards to the Habitats Directive. Therefore, I have considered this application in light of this ruling which must be interpreted as meaning that provision of mitigation measures intended to avoid or reduce the harmful effects of the plan on a European designated site at the screening stage is no longer appropriate.

Due to the large scale of the proposed works and the entire site being classed as a SW&BG 'Primary Support Area', recreational disturbance on the European designated sites and loss of a primary supportive habitat for SPA birds is considered to be the main two Likely Significant Effects (LSE) at the Screening Stage and therefore it is necessary to proceed to the Appropriate Assessment Stage. Whilst I can confirm that the LSE as a result of increased recreational pressure can be mitigated through the SRMP (Solent Recreation Mitigation Partnership) and securing the appropriate financial contribution from the developer, sufficient information has not been submitted to enable the LPA to confidently conclude that the impact on SPA birds as a result of the partial loss of Primary Support Area for SPA birds can be mitigated.

Please do contact me if you need any further information.

Kind regards,
Maral

Please note that this advice is given in accordance with the Service Level Agreement that has been signed between Hampshire County Council and your Council. These comments are expressed as a professional view provided to Fareham Borough Council and should not, therefore, be interpreted as those of Hampshire County Council.

Maral Miri (MSc, CEnv, MCIEEM)

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**APPENDIX B: BADGER SETT LOCATION PLAN IN RELATION TO BRENT
GOOSE RESERVE FENCE**



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Key

- Site Boundary
- Badger sett
- 30m combined badger sett buffer
- Brent goose reserve fence

fpcr

client
Foreman Homes Ltd

project
**Land South of Romsey Avenue,
Fareham**

drawing title
**Appendix B- Badger sett locations in relation
to brent goose reserve fence**

scale
1:1

drawn
SLD / APD

issue
26/7/2021

drawing / figure number

rev

Appendix B