

Cumming, Claire

Subject: FW: P/20/1168/OA & P/20/1166/CU - Land to the south of Funtley Road Fareham

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

Sent: 17 November 2020 16:12

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

Subject: P/20/1168/OA & P/20/1166/CU - Land to the south of Funtley Road Fareham

Dear Richard,

P/20/1168/OA - Land to the south of Funtley Road Fareham - Outline Application To Provide Up To 125 One, Two, Three And Four-Bedroom Dwellings Including 6 Self Or Custom Build Plots, Community Building Or Local Shop (Use Class E & F.2) With Associated Infrastructure, New Community Park, Landscaping And Access, Following Demolition Of Existing Buildings

P/20/1166/CU - Land to the South of Funtley Road Fareham - Change Of Use Of Land From Equestrian/Paddock To Community Park Following Demolition Of Existing Buildings

Thank you for consulting me on these planning applications. Due to the location of these applications and as achieving biodiversity net gain and nitrogen neutrality for one site is dependent on the other site and as the ecological issues on both sites are the same, I have provided one response, which applies to both sites.

Both sites have been subject to previously approved applications (ref nos. P/18/0067/OA and P/18/0066/CU) and therefore there is much history in relation to these sites. Whilst the application for the southern section remains unchanged (i.e. change of use of land from equestrian/paddock to community park), the number of proposed residential dwellings have changed from the previously agreed 55 units to 125 units for the northern part of the site.

Both applications are supported by the same Ecological Assessment report (Ecology Solutions, September 2020). This report confirms that updated surveys were carried out in July and September 2020. In summary, the buildings and trees to be affected by the proposals were identified to have no potential for roosting bats. The likely absence of great crested newts had also been previously confirmed. A low population of slow worms and grass snakes had been established to be present on site, along with a number of badger setts and a population of dormice. Bat activity surveys had also confirmed the usage of the site by a number of common bat species such as common and soprano pipistrelle, myotis species, noctule, serotine and brown long-eared bats and rarer species such as Nathusius' pipistrelle and barbastelle (only recorded in 2020). In terms of non-native species, Japanese knotweed is known to be present on site. Great Beamount Coppice SINC and Ancient Woodland (three separate parcels) is also located within the application sites.

Whilst the full scope of the mitigation measures in relation to protected species is not available due to the outline nature of the applications, the principles of mitigation in the form of maintaining dark landscaped buffers for foraging/commuting bats, provision of an on-site receptor site for reptiles, compensatory planting and staged vegetation clearance to ensure the protection of dormice, etc. is acceptable and the specific details can be secured via a planning condition.

Whilst the proposals in the north of the site will result in a net loss in biodiversity, I am confident that the proposals for the Country Park is capable of compensating for this net loss, and achieving a net gain in biodiversity, which should be demonstrated in a measurable way (e.g. use of Defra Metric 2.0). This could be secured via a planning condition.

Furthermore, provided that the required SRMP contribution is secured and nitrogen neutrality achieved as per the details provided, I have no concerns that these proposals will have an adverse impact on the integrity of the nearby European protected designated sites.

Regardless of the above, I have major concerns in relation to the impact of the proposals on Great Beamond Ancient Woodland/SINC, which should be resolved prior to a decision being made. First concern is in relation to the proposed buffer along the boundary of the woodland in the north. In the submitted ecology report it is stated that a 15m buffer will be implemented. The same buffer was proposed for the previously approved application which was for 55 residential units. It should be noted that Natural England states a *minimum* of 15m buffer is required to protect Ancient Woodland from indirect impacts,; however, larger buffers will be required depending on the nature of the development proposals. Therefore, it is unclear as to how the applicant's ecologist deems the same buffer to be appropriate for a proposal which results in over twice as many residential units as before and therefore more risk of public interference, pet predation, etc. I am not satisfied that the proposed buffer will sufficiently protect the Ancient Woodland and request that a larger buffer is considered.

My second concern is in relation to the submitted Parameter Plan which shows a proposed cycle track through the Ancient Woodland. This has not been acknowledged within the submitted ecology report. Furthermore, the previous applications were approved on the basis of the existing unofficial track within the woodland being blocked off and reinstated, along with buffer planting and fencing to ensure no habitat degradation as a result of increased recreational pressure on the Ancient Woodland. The proposed cycle path is deemed to be unacceptable and will result in increased use of the woodland by the public and detrimental impacts on this irreplaceable habitat. Therefore, I request that the illustrative masterplan and the Parameter Plan are changed to reflect the previously agreed measures in relation to this habitat.

I also note that along the northern boundary of the site, in addition to the existing access road, which will be retained and a previously agreed new footpath, another footpath is proposed. This will result in further fragmentation of the green network in the north and therefore, its impact on protected species (e.g. dormice, commuting bats such as barbastelles) and any additional mitigation measures required, should be discussed in the submitted ecology report.

The bat activity surveys in August and September 2020 confirmed the low use of the site by barbastelle bats which are rare and more light sensitive. Whilst the submitted ecology report states that the lighting scheme will be designed to minimise adverse impacts from artificial lighting on retained and newly provided habitats, I request that further information is provided as to how this could be achieved along the northern and

north-western boundaries of the site (hedgerows H5 & H6), which appear to be a connective feature between the Ancient Woodland on site and another parcel of woodland immediately outside the north-western boundary of the site. Considering the number of units in this area, provision of a dark commuting and foraging corridor seems unachievable.

Based on the above raised concerns, it is my advice that permission is not granted until further information is submitted.

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

Kind regards,
Maral

Coronavirus (Covid-19)

Hampshire County Council's response to the Covid-19 is available here (<https://www.hants.gov.uk/socialcareandhealth/coronavirus>).

In line with Government advice to reduce non-essential travel and work from home where possible, Ecology officers are now working remotely. Whilst we will endeavour to conduct our services in a timely manner and to meet statutory timescales where we can, there may be some impact to the services we deliver. We will ensure that we keep all applicants / interested parties informed of any further impacts to our services should they arise. The Council's response also means that no non-essential site visits or face to face meetings will be undertaken until further notice. Essential and contractual surveys may continue take place where there is no risk to the surveyor or the public, and in line with Government advice. This will be reviewed on an on-going basis.

Maral Miri (MSc, CEnv, MCIEEM)

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