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Hampshire County Council  
Elizabeth II Court  
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Winchester  
Hampshire  
SO23 8UD

06<sup>th</sup> April 2022

Our ref: 784-B030739

**Re: Land East of Newgate Lane, Fareham – response to ecology comments**

Dear Maral,

We have reviewed the ecology comments (8<sup>th</sup> March 2022) and please see below for our comments to the points raised. In particular we are responding to your queries regarding mitigation for waders and brent geese.

*“My first concern is that it is proposed to plant a hedge along the northern and southern boundaries, along with occasional hedgerow trees. This field already supports a hedge along the eastern and western boundaries. This will affect the clear sight lines that these birds require, particularly species such as black-tailed godwit.”*

The proposed hedge along the northern boundary will have negligible impact upon the openness of the site as there is an existing hedgerow with trees along this boundary. Therefore, flight lines will be unaffected (and it should be remembered the location of the proposed mitigation area is itself a site within the wader and brent goose network). We only propose a smaller hedge, slightly further in to prevent disturbance from the required east / west pedestrian access. We do not believe a small hedge along the southern boundary would have any impact on sightlines either, as similar hedges are present subdividing field compartments throughout F15 and similar network sites throughout Fareham. However, this hedgerow could easily be omitted. In relation large hedgerow trees, these will be omitted from the detailed landscape proposals. Hedges will be kept short in height so as to leave flight lines clear and maintain openness – as per the existing conditions on site.

In relation to openness, it is critical to bear in mind that F23, the secondary support area, is surrounded by tall trees on all sides and is therefore much more enclosed than the proposed mitigation area. Therefore, the proposed mitigation area is superior in terms of openness.

*“I also note that a ditch is proposed outside the northern boundary of the Bird Mitigation Area. This feature could enhance the value of the site and it is not clear why it has been located outside the Mitigation Area”.*

The ditch is located outside of the hedgerow to help act as an additional barrier to entering the mitigation area – a standard design point requested by Natural England for such sites. A further ditch could easily be created on the inside edge of the hedge as a habitat feature.

*“Most importantly, whilst creation of shallow scrapes will enhance the value of the site for waders, a single large basin which is likely to be a requirement as part of the drainage strategy for the site and not a well-considered enhancement feature designed for the birds, has been located in this field. No information has been provided in relation to the levels/depths of this feature (other than it will be 0.8m deep) to ensure that it will be suitable for wintering birds recorded on and adjacent to the site”.*

This is currently an outline application. There is no reason why the basin cannot as part of the detailed design be shaped with appropriate irregular edges to offer a range of depths and feeding areas for waders – whilst still providing the required storage capacity. The recent appeal allowed at Posbrook used this approach with a large scrape fed by rainwater from the development to maintain suitable wet conditions.

*No justification has been provided as to how this Mitigation Area is still suitable. Has this been agreed by Natural England?*

The proposed Low Use site mitigation is a negligible change from the previous, approved mitigation for Land at Newgate Lane (South) and Land at Newgate Lane (North). There is a minor increase in the total area of Low Use site lost (from 11.84 to 13.8 ha). As with the previous strategy, a substantial portion of F15 would remain (11.3 ha) enabling it to continue to function as a Low Use site. Thus, although there is a small change in the relative areas, there is no change in terms of function. The approach remains the same, i.e. a partial loss of a Low Use site (F15) to be compensated by a permanent mitigation area in a suitable location which Natural England have agreed constitutes an enhancement of the wader and brent goose network in line with the SWBGS Mitigation Strategy.

I hope that you find this information helpful, please do not hesitate to contact us if you have any further queries.

Yours sincerely,



David West CEnv MCIEEM