

From:Chris Hodsmen

Sent:22 Sep 2021 11:15:06 +0100

To:Warren Simmonds;Planning

Subject:FW: Consultation to Ecologist on Planning Application 21/10938 Full Planning Permission

Importance:High

Hi Warren,

Thanks for consulting me on application 21/10938.

I have reviewed the Tetra Tech Ecological Appraisal, dated June 2021.

Whilst I have no objection the development in principle, I would currently recommend the application for **refusal**, the main factor in making this recommendation relates to incomplete survey work for protected species, in this instance, bats and also biodiversity net gain.

Designated Sites

The site lies in close proximity to the New Forest SAC, SPA and Ramsar and Solent and Southampton Water SPA, Ramsar and Solent Maritime SAC. The proposals would result in additional residential dwellings. As stated in the Ecological Appraisal:

- There is a likely cumulative impact on the New Forest European Sites from recreational disturbance ☐ recreational habitat mitigation should be provided in line with the adopted mitigation strategy.
- The site falls within 5.6km of Solent and Southampton Water SPA at the closest point ☐ There is a likely cumulative impact from recreational disturbance ☐ as such it would be necessary to contribute towards recreational habitat mitigation in line with the adopted mitigation strategy.
- Nitrate impacts on Natura 2000 designated sites ☐ Evidence has shown that residential development contributes to high levels of nutrients in the water environment, specifically nitrates in Solent catchments. Adverse effects on international nature conservation sites in New Forest area cannot be ruled out. Following recent case law, residential and other development providing overnight accommodation will need to mitigate its effects to become nutrient-neutral, to avoid making the current situation worse. Adverse effects arise from increased sewerage treatment, and from surface water run-off from both urban and greenspace areas. Nitrate calculations should be undertaken using the latest version of Natural England Guidance ☐ Advice on Achieving Nutrient Neutrality for new Development in

the Solent Region (Currently Version 5 June 2020) and NFDC occupancy rates. Further details are available on the NFDC website at: [Nutrient neutral development - New Forest District Council](#).

The Ecological Appraisal references a Nutrient Balancing Assessment, I have not however been able to locate this. I note that the water quality checklist has been completed.

Habitats

NFDC have published an interim guidance document on ecology and biodiversity net gain. This is available at the following link: <https://www.newforest.gov.uk/article/2650/Ecology-and-Biodiversity-Net-Gain> This is in the process of being updated following release of Biodiversity Metric 3.0 but for major applications (10 or more units) a minimum of 10% biodiversity net gain is expected to be demonstrated. Guidance on what the submission should include is provided in the aforementioned guidance document.

The Ecological Appraisal makes recommendations for habitats which are welcomed, but no biodiversity net gain calculations have been submitted in support of the application. These are requested.

Species

Bats

The Ecological Appraisal identifies two buildings on site as offering low potential to support roosting bats and recommends the following:

Two buildings have been assessed as having suitability to support roosting bats and are recommended to be subject to further surveys in order to ascertain the presence or likely absence of roosting bats. Buildings B2 and B3 were assessed as being of low suitability. As these buildings are proposed for demolition, a nocturnal bat survey is recommended. These would comprise a single survey visit, with a dusk emergence or one dawn return survey (to be conducted between May to August inclusive).

On the basis of the information supplied with the submission I cannot see that these surveys have been completed. Protected species are a material planning consideration and as such I would recommend the application is refused.

Inclusion of two bat boxes are proposed, this is welcomed in principle but I await the results of the emergence/re-entry survey to determine if this is satisfactory and appropriate mitigation / enhancement.

Birds

The Ecological Appraisal identifies the building and vegetation on-site as being suitable to support nesting birds. As such I would recommend inclusion of the following planning condition:

□ No clearance of vegetation (e.g. trees, shrubs and scrub) or building demolition that may be used by breeding birds shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of the vegetation/building for active birds' nests immediately before the vegetation is cleared or works commence and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority□.

In addition, I note a representation has been made by Hampshire Swifts welcoming the provision of swift nest boxes, however, seeking that the number provided is increased. I share the views presented by Hampshire Swifts, and would endorse their representation requiring a greater number of swift bricks be incorporated into the proposals. I would therefore recommend including the planning condition below as suggested by Hampshire Swifts:

□ Prior to the commencement of development, a Plan shall be submitted to and approved in writing by the LPA of integral Swift Bricks within buildings. The agreed Plan shall show the number, specification of the Swift Bricks and where they will be located, together with a timetable for implementation and commitment to being installed.

Following completion of the dwellings and prior to their first occupation, a report from an appropriately qualified ecologist confirming that all integral Swift Bricks have been installed as per previously agreed specifications and locations together with photographic evidence shall be submitted to and approved in writing by the Local Planning Authority.

Please feel free to give me a call if you would like to discuss.

Chris Hodsmen BSc MSc MCIEEM

Ecologist

New Forest District Council

Tel: **023 8028 5747** | Mob: **07557059262**

My usual working days are Tuesday to Friday



From: planning@nfdc.gov.uk <planning@nfdc.gov.uk>

Sent: 22 September 2021 09:00

To: Chris Hodsmen <Chris.Hodsmen@NFDC.GOV.UK>

Subject: Consultation to Ecologist on Planning Application 21/10938 Full Planning Permission

The Council has received the following Full Planning Permission application, which you can [view online here](#) . We endeavour to have the information available online within 48 hours.

APPLICATION NO: 21/10938

SITE: Former POLICE STATION, SOUTHAMPTON ROAD, LYMINGTON
SO41 9GH

DESCRIPTION: Demolition of existing building and redevelopment of the site to
form 32no. Retirement apartments including communal facilities,
access, car parking and landscaping

**LISTED
BUILDING?
CONSERVATION
AREA?** NO
Lymington Conservation Area

Please find a CONSULTATION sheet (in pdf format) attached.

If you wish to make any comments on the proposal, please send them, preferably using our online comments screen or by e-mail to planning@nfdc.gov.uk, quoting the application number. If I do not hear from you by 13 October 2021. I will assume you have no comment to make.

The case officer dealing with this application is Warren Simmonds who can be contacted on 023 8028 5453 or by emailing warren.simmonds@nfdc.gov.uk.

You can track the progress of this application on the planning website by undertaking an online search using the planning reference number including details of the decision that is made. You are also able to see all comments and consultation responses related to this application as these are regularly updated on our website.

Development Management, Planning