

SS6 Review of Submitted Ecological Information

Comment on Ecological Impact Assessment

The Ecological Impact Assessment follows the standard approach to assessing ecological value of a site with an emphasis on legally protected species and sites. It fails to take a wider perspective of the site in the context of an ecologically diverse landscape and as a consequence, it is superficial and fails to consider many ecological aspects of the site.

The habitat assessment uses UK Habs classification to describe the habitats within the site. This is an appropriate first approach to assessing the value of the habitat present within the development. However, the classification is by its nature reductionist and hence is not appropriate for assessing priority habitat types that are composed of a complex of habitats. Indeed, the UK Habs Manual states;-

“Habitat complexes similarly occur across a range of underlying land uses and therefore do not easily fit within the hierarchical structure of UKHab. For example, priority habitat complexes with a long history of modification, such as wood pasture and parkland, can occur over wider areas”

In fact, the site of SS6 is composed of a complex of grassland, scattered trees (including mature and veteran trees) and scrub that function as part of the wider pastoral landscape of this part of the New Forest. This should be assessed not in terms of its component habitat types but as an example of the Priority habitat type, Wood-Pasture and Parkland. This extends beyond the application site to the east into Woodside Park and surrounding tree lined lanes. The habitat is characterised by the combination of grassland and scattered mature and veteran trees and the presence of a distinctive assemblage of birds, mammals, invertebrates and plants.

The submitted Ecological Impact Assessment provides some useful information on the use of the application site by bats including the rare Barbastelle bat. These and other tree hole and crevice roosting species, such as the Noctule and Serotine that were also recorded, are typical of wood pasture and parkland habitats. The bat survey also refers to unidentified *Myotis* bat species. These could well be the rare Bechsteins bat. Like the Barbastelle, these are also listed on Annex II of the EU Habitats Directive and are widespread in the New Forest. However, the presence of Bechstein's bats cannot be determined from bat call analysis and require trapping surveys to identify. These have not been undertaken in this instance and it should be assumed that Bechstein's bats could be present within the site. This would further confirm the wood pasture and parkland nature of this habitat.

Apart from the bat survey, there is a stark absence of ecological survey data that would enable an assessment of the wood pasture and parkland habitat to be undertaken. The breeding bird surveys are superficial and have failed to identify many species known to be present in the area that are characteristic of wood pasture habitat, for example, Tawny owl, Barn owl, Green woodpecker.

There has been no invertebrate survey to assess the value of the habitat for species associated with dead and decaying wood. The area is known to support breeding Stag beetles and a diverse moth fauna including many species associated with epiphytic lichens often found on the trunks of parkland trees. Stag beetles are an Annex II species and a feature of the New Forest SAC. It is likely that other invertebrate species typical of wood pasture and parkland area also present on the site, if surveys had been undertaken to identify them.

The vegetation survey classifies the grassland as g4 Modified Grassland. This is in error. The grassland present over most of the application site is best described as g3 Other Grassland and most is referable to g3c6 *Lolium-Cynosurus* neutral grassland. There does not appear to have been any systematic botanical recording of this grassland, indeed the species list provided refers generically to many species such as Bentgrass (*Agrostis* spp) Buttercup *Ranunculus* spp. and Thistle *Cirsium* spp. In fact, there are several

species of Bentgrass, Buttercup and Thistle on the site. It is clear, even from the brief species list provided, that the grassland described is far more species rich than the Modified Grassland dominated by sown agricultural grasses classified as g4.

Habitats Regulations Assessment

The HRA does not take account of sea level rise and coastal squeeze. This is likely to bring habitat and qualifying bird populations closer to development site. Indeed the EA is currently working on a revised Coastal Strategy for this section of coastline that could well result in managed realignment of the coast and landward movement of the high water mark.

The HRA should also consider Solent and Dorset Coast SPA due to important populations of breeding terns on the Lymington to Keyhaven marshes. This has not been mentioned in the HRA.

New Forest SAC. Table 18 Outcome of screening assessment. This table concludes that there will be no likely significant effect on the SAC because no supporting habitat or Annex II species have been identified. This is in error due to lack of survey effort as there are numerous records of Stag beetle (Annex II feature of the New Forest) from around the site.

The HRA focusses on the screening stage of the assessment and rightly concludes that there is a likely significant effect on a number of European sites. However, the Appropriate Assessment is very brief and relies almost entirely on the provision of ANRG to mitigate the adverse effects of the proposed development. No assessment is made of the impacts of recreational disturbance on the conservation objective of these sites, as is required by an appropriate assessment and no consideration is given as to the impact of these effects on the integrity of the European sites concerned. The Shadow HRA concludes that the local authorities will determine no adverse effect on site integrity based on their reliance on the ANRG Local Plan policy.

As PALLS has maintained, it is unlikely that the ANRG policy will provide sufficient mitigation for the cumulative impact of recreation on the Solent and New Forest European sites that are threatened by housing development in the New Forest.

The bird survey that has been undertaken to determine winter bird use of the development site and assess its impact on the Solent and Southampton Water SPA/Ramsar site is clearly inadequate. PALLS has data to show that field NF228 is regularly used by flocks of Little Egret. These are part of the SPA/Ramsar site qualifying assemblage of wintering waterfowl and are also a species listed on Annex I of the EU Birds Directive. The Ecological Impact Assessment and HRA have failed to assess impacts on the use of this field by this and other wintering waterfowl.

Biodiversity Net Gain

The BNG calculation takes forward the simplistic and erroneous survey of the grassland. It assesses this as being of poor quality due to limited species diversity, but it is clear that no quadrat survey has been undertaken to determine the number of species per m² needed to make this assessment and the species identification is too superficial to have any reliance on its conclusions.

The BNG calculation should be undertaken with the baseline habitat as Wood-pasture and parkland. This has distinctiveness of 'Very High' and requires 'Bespoke compensation' to offset its loss. This would be largely destroyed by the proposed development resulting in a negative BNG.

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