

## Altman, Rebecca

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**From:** King-Smith, Frances <Frances.King-Smith@hants.gov.uk>  
**Sent:** 12 January 2021 17:57  
**To:** Altman, Rebecca  
**Subject:** 20/01257/OUT (Ecology ref 20.1460) FARLINGTON WATER TREATMENT WORKS, GILLMAN ROAD, PORTSMOUTH, PO6 1BL

**Follow Up Flag:** Follow up  
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**Categories:** Purple Category

Dear Rebecca,

### **20/01257/OUT (Ecology ref 20.1460)**

**FARLINGTON WATER TREATMENT WORKS, GILLMAN ROAD, PORTSMOUTH, PO6 1BL - OUTLINE APPLICATION FOR CONSTRUCTION OF NEW WATER TREATMENT BUILDING (TO ACCOMMODATE DISSOLVED AIR FLOTATION PLANT) AND ASSOCIATED FACILITIES, COMPRISING A SLUDGE HOLDING TANK; NEW ACCESS ROAD TO A SERVICE/DELIVERY YARD; UNDERGROUND PIPEWORK, CHAMBERS AND CONNECTIONS; TEMPORARY CONSTRUCTION COMPOUNDS, MATERIALS STORAGE AND PARKING AREAS. (PRINCIPLES OF ACCESS, LAYOUT AND SCALE TO BE CONSIDERED)**

Thank you for consulting me on this application for a new water treatment building at Farlington Water Treatment Works. Please accept my apologies for the delay in responding. The application is supported by a comprehensive Ecological Impact Assessment and a Biodiversity Net Gain Assessment (Atkins, September 2020), based on site surveys, a desk study and use of the Defra Biodiversity Metric 2.0. My detailed comments are below.

#### Designated Sites

The site lies within the Land East and West of Gillman Road Site of Importance to Nature Conservation (SINC), and the proposals will see the permanent loss of around 200m<sup>2</sup> of the SINC habitat, which comprises calcareous grassland. There will also be temporary losses, which are suitably mitigated under the proposals. Enhancement of an area of retained calcareous grassland is proposed, and the proposals are deemed to have no residual significant effect on the conservation status of the SINC.

While this is likely to be the case, I still have a minor concern regarding the reduction in size of available SINC habitat, and that this loss may contribute to wider habitat fragmentation. I would advise that the proposal therefore needs to be considered in light of Policy PCS13 of the Portsmouth Plan in relation to Local Wildlife Sites, i.e. *allowing development only if it clearly outweighs the substantive nature conservation value of the site, an impact on the site cannot be avoided or mitigated and compensatory measures are provided.*

In order for the proposal to satisfy this policy, I would advise that the LPA must be satisfied that the need for or benefits of this development in this location outweigh the clear impacts to biodiversity – i.e. loss of the extent of the SINC.

I would also ask the Applicant to explore whether it would be possible to offset this loss by creating or enhancing an area of calcareous grassland elsewhere on nearby Portsmouth Water land, to provide the compensatory measures required under PCS13. Section 5.3 of the Biodiversity Net Gain Assessment references my discussion with the ecologist on net gain in June 2020 and sets out a compensation strategy, which mentions offsetting. Some of these principles are not carried through into/confirmed by the Ecological Impact Assessment, but unifying the approaches of the two

documents could provide the compensatory measures required under PCS13, and ensure that these can be secured via condition.

### Mitigation

A detailed mitigation package is proposed in Section 4 of the Ecological Impact Assessment. Before this can be secured via condition, I would ask for clarification on the following point from Section 4.5 in relation to bats, which is not clear:

- *Construction work between dusk and dawn (taken to be from 30 minutes before sunset to 30 minutes after sunrise) during periods when bats are active (typically April to October inclusive) where possible. If this is not possible, any lighting required will be directed downwards at the construction works and light spill to adjacent habitats avoided*

I hope this is helpful but please do contact me if you need any further information.

Kind regards,

Frances

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 Portsmouth City Council and should not, therefore, be interpreted as those of Hampshire County Council.

**Frances King-Smith**

**Senior Ecologist (SLA Liaison)  
Ecology Team**

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Please note that my normal working days are Monday, Tuesday and Thursday. I am now working from home and at times on-site. I may have sporadic access to emails during the day due to working irregular hours, **particularly on Tuesdays**. I will endeavor to respond to emails as soon as possible.

### **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.*