



**Hampshire &  
Isle of Wight**

Mr J Owen  
Planning Service: Development Control  
Test Valley Borough Council  
Beech Hurst  
Weyhill Road  
Andover  
SP10 3AJ

**21 August 2007**

**Your Ref: 07/01951/OUTN**

**Our Ref: 13.34.3 CRM**

Dear Jason

**07/01951/OUTN: Business park and associated works at former Andover Airfield, Monxton Road, Andover**

Thank you for consulting the Trust on the above planning applications.

The Trust **objects** to this application in its present form, for the reasons summarised and then detailed below:

1. Loss of unimproved calcareous grassland habitat and associated impacts
  - a) Loss of local and national BAP habitat
  - b) Loss of habitat important for nationally declining skylarks
  - c) Loss of habitat important for nationally and internationally protected invertebrates and herpetofauna
  - d) Loss of habitat for nationally declining brown hares
2. Impact on/loss of nearby Site of Importance for Nature Conservation (SINC)
3. Inappropriate development, contrary to Test Valley Borough Local Plan policy AND 04.1b
4. Potential impact on aquifer, and potential knock-on impact on the River Anton/Pillhill Brook, and thus the River Test (SSSI, SPA, Ramsar)

***1. Loss of unimproved calcareous grassland habitat and associated species***

Firstly, the Trust would like to emphasise our recommended approach of *avoidance* of loss of habitats and/or species *first*, and only to consider mitigation if it is determined that avoidance is absolutely not possible.

**a)** The unimproved calcareous grassland on site has been classified according the National Vegetation Classification (NVC) as CG3 *Bromus erectus*. This habitat type is identified as a Biodiversity Action Plan (BAP) habitat of local and national importance (Environmental Statement Technical Appendices, Extended Phase 1 Habitat Survey, Section 5.3: Ecological Assessment). The Ecological Assessment goes on to state that with appropriate management to enhance the grassland, it is likely to qualify for SINC status (Site of Importance for Nature Conservation).

The current design of the development and associated landscaping results in the loss of the majority of the BAP habitat grassland. The Trust has been unable to find details within the application papers of how this grassland is proposed to be protected during the construction phase, nor a detailed long-term protection and maintenance

plan (the landscaping proposals only mention cutting twice a year with herbicide treatment of invasive weeds). The applicant's proposed measure for mitigation against this loss is to translocate a small proportion of the grassland to sites within the development, as part of the landscaping scheme.

The Trust **objects** to proposed translocation of the small proportion of the total grassland, and objects to the loss of the greater remainder of grassland. There is no scientific evidence to suggest translocation of habitats is successful. Of the studies that have been undertaken elsewhere, it has been found that plant community composition following grassland translocation alters significantly, often becoming less diverse, and favouring lower quality species compositions (Jefferson *et al.* 1999<sup>1</sup>). Furthermore, translocation of grassland does not take into consideration the impacts of removing part of an ecological system which has developed over time and incorporates complex interactions with soil biota, invertebrates and nutrient flows.

It should be noted that the unimproved grassland only comprises approximately 6 ha of the application site. The Trust believes that this is not a significant proportion of the overall site, and as such retention of the two portions of grassland should not be considered too onerous an amount for retention and protection. The Trust would be interested to review any amended plans which seek to avoid loss of this important habitat, through creative design and rearrangement of the proposed buildings and associated works.

Additionally, the Trust feels that despite not being designated as a SINC, the grassland within the application site may merit this designation, and as such this application should be considered in conjunction with Test Valley Borough Local Plan policy ENV 04.

As a last resort should this application be approved, and grassland lost as a result, the Trust would wish to see mitigation measures involving an equivalent area either on- or off-site to be protected and enhanced as compensation against this loss, and incorporated in a Section 106 agreement. Further, the Trust understands that since the ecological survey was carried out, some of the grassland has been destroyed during archaeological investigations. Therefore, this will also need to be compensated for.

**b)** The Trust also believes that the grassland provides suitable habitat for the skylarks which have been recorded as present on site. Section 5.2 of the Extended Phase 1 Habitat Survey recognises that skylarks are a local and national BAP species, and have been recorded as present on the application site. The Trust notes that skylarks are also designated as a Red List species, and Species of European Conservation Concern, and have experienced a rapid decline of  $\geq 50\%$  over the last 25 years. Skylarks are therefore of high conservation concern. As such, it is critical that should development of this site be approved, loss of nesting/feeding habitat for this species must be mitigated for. If approved, the Trust would **strongly recommend** a condition requiring provision of suitable habitat on site, to be incorporated within the landscaping and/or mitigation scheme, with the retention of the grassland as suitable foraging and nesting habitat for this species.

**c)** Although no specific survey work was undertaken for invertebrates or herpetofauna (reptiles and amphibians), the Extended Phase 1 Habitat Survey recognises the value of the habitats on site for such fauna. The Trust recommends that further survey work is undertaken, prior to works commencing, to establish whether any protected reptiles or amphibians are present on site. Should development of this site be approved, measures must be taken to protect any such species during construction, and to provide suitable habitat for them during and after construction with an appropriate long-term maintenance plan. Such measures should be approved and implemented prior to any works commencing.

Furthermore, the Trust has been advised that an independent ecological survey has been carried out on the site, and that this found evidence of Great Crested Newts on site. The Trust has not been able to confirm this finding, but would urge the applicants to contact the Hampshire Amphibian and Reptile Group to verify this, and appropriate measures for protection and mitigation to be agreed and implemented as above.

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<sup>1</sup> English Nature Research Report 304: Grassland Habitat Translocation – The case of Brocks Farm, Devon

**d)** The ecological assessment found no evidence of brown hares on site, although it was considered that the site as existing provides suitable habitat for brown hares. The brown hare is a BAP species, which has undergone significant decline in population numbers since the 1960's. As there is the potential for brown hares to use the site, should development be approved, mitigation measures for loss of habitat must be approved and

implemented prior to any works commencing. The Trust supports the recommendations in the ecological assessment for the precautions to be taken in respect of brown hares.

### ***2. Nearby Site of Importance for Nature Conservation***

The Extended Phase 1 Habitat Survey suggests that this application will not have an adverse impact on the SINC to the north of the site, (OS grid ref: SU33824592), at the A303/A343 intersection. The Trust disagrees with this statement. As a condition of development of the airfield site, the Test Valley Borough Local Plan (TVBLP) specifies that this junction will be improved. The General Arrangement plan (Drawing 102 Rev A), in the non-technical summary report shows extensive works to this junction, and the Trust is concerned that these works will have an adverse impact upon the SINC, including loss of part, and overall degradation, of the SINC. Should development of the site be approved, the Trust **strongly recommends** that detailed measures to protect the SINC, which comprises three small parcels of land, are submitted, approved and implemented prior to any work commencing. The Trust would wish to be consulted on such proposals.

### ***3. Inappropriate development***

The Trust feels this development is contrary to TVBLP policy AND 04.1b, by reason of its scale and design. The very large scale of this building will dominate the landscape and be visible over a wide area. Furthermore, the Trust would question the necessity of this type of development in relatively close proximity to the proposals for a large-scale B8 development at Hartland Park, Pyestock, near Junction 4A of the M3.

### ***4. Potential impact on aquifer***

The Environmental Statement (Water Resources) recognises that the application site overlies a major aquifer, and proposes a number of measures in the summary (p 172-173), for protection and mitigation. The Trust supports the proposals for use of SuDS, and would also wish to see other measures for sustainable water use incorporated in conditions for approval, should it be granted. However, the Trust is still concerned that measures for protection of the aquifer during and after construction may not be adequate, and would seek assurance that the recommendations of the Environment Agency for the protection of groundwater will be incorporated in conditions to any approval, should it be granted. In particular, the Trust is concerned that contamination of the aquifer and/or the Pillhill Brook could have adverse impacts on the River Test, of which Pillhill Brook is a tributary, via the River Anton. The River Anton is a SINC, and as such the Trust is also concerned to ensure appropriate measures are in place to prevent contamination of these water courses.

### ***Other comments***

- i) The Trust notes in the Extended Phase 1 Habitat Survey Section 3.2 that one SINC has been identified to the north of the site. It should be noted that ***a further SINC exists to the south of the application site***, at Little Park (Red Post) Field, OS grid ref: SU32834508. This site was designated a SINC in December 2006 as supporting one or more notable species. Due to the close proximity to the application site, it is possible that any mobile species of interest which may be present on this SINC may also make use of the application site. The Trust recommends that the Hampshire Biodiversity Information Centre is contacted for further details.
- ii) The Trust would wish to see proposals for off-site mitigation against loss of cereal field margins, which are identified in the Phase 1 habitat survey as present on site, and recognised as priority BAP habitat for Hampshire.
- iii) The Trust would wish to see conditioned in any proposals the use of lighting designed to reduce light pollution. The Institute of Lighting Engineers provides guidance on reducing obtrusive light in order to minimise light pollution whilst achieving desired levels of security and safety.

- iv) The Trust respectfully reminds the Council of its duty under the NERC Act to conserve biodiversity, and to the Council's commitment to conserve biodiversity, through TVBC proposals for a local BAP and signing up to the Hampshire BAP.
- v) The Trust would welcome any proposals for provision of education boards relating to the unimproved calcareous grassland and other wildlife on site, promotion of green transport and energy efficiency, and sustainable drainage systems/water use.

If you wish to discuss these matters further, then please do not hesitate to do so. I also ask that you keep the Trust informed of the progress and outcome of this application.

**Yours sincerely**

*C Rankin-Moore*

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