

Dear Tina,

**Re: APP/22/00029 | Works to convert the doctor's surgery (E) to offices (E) plus the erection of a two storey building comprising a commercial unit (E) following the demolition of the existing single storey extension. With associated parking and hard and soft landscaping, including provision of one additional parking space. | North Street House, 6 North Street, Emsworth, PO10 7DD (Our Ref: 22.0214)**

**AND**

**APP/22/00030 | Listed Building Consent for Works to convert the doctor's surgery (E) to offices (E) plus the erection of a two storey building comprising a commercial unit (E) following the demolition of the existing single storey extension. With associated parking and hard and soft landscaping, including provision of one additional parking space. (Our Ref: 22.0215)**

Thank you for consulting me on these planning applications. In summary, I have concerns regarding the validity of the ecological data submitted with the applications and would recommend that determination is postponed until further information is provided in this respect.

The submitted Bat Survey Report (Hampshire Ecological Services, January 2022) assesses the existing building as having low potential for roosting bats and sets out the results of an external daytime building survey on 10<sup>th</sup> August 2020 and a single dusk emergence survey carried out the same evening, during which no bats were recorded emerging from the building. With reference to the professional guidance provided by the Chartered Institute for Ecology and Environmental Management on the validity of ecological surveys (CIEEM, 2019), bat survey data is considered to be valid for a period of 12 months, as also noted at Paragraph 11 of the submitted bat survey report. The surveys conducted at this site are therefore out of date, and were conducted towards the end of the active bat season in 2020, when species which establish maternity roosts earlier in the year (such as pipistrelle bats) may have already started to disperse. Furthermore, Covid-19 restrictions meant that internal access to the loft spaces/roof voids was not possible. The building assessment was therefore based on an external daytime assessment only, which nonetheless recorded a number of potential roost locations and suitable bat access points on the north, east and west elevations of the existing buildings. Although the site is in a built-up area, bat activity was recorded on site during the dusk survey undertaken in August 2020 and there is suitable bat foraging habitat nearby at Emsworth Mill Pond and Lumley Meadow, as well as numerous bat records in the local area.

NPPF, Circular 06/2005 and Natural England Standing Advice on Protected Species, require that planning decisions are based on full, up-to-date ecological information and it is essential that all necessary survey, assessment and mitigation information is available to the LPA prior to determination, particularly in the case of protected species, which are a material planning

consideration. This will enable the LPA to determine the application on the basis of full knowledge about the ecological impacts of the proposal and to ensure that any impacts can and will be mitigated, and are acceptable.

The bat surveys should therefore be updated by the applicant's ecologist, in line with Bat Conservation Trust Guidance for Professional Bat Surveys (BCT, 2016) and the resulting data submitted in an updated report prior to planning determination, along with any necessary amendments to the mitigation strategy in respect of bats. If roosting bats are present, this should include construction and operational lighting in line with the enhancement recommendations set out in 5.6.2 of the submitted Bat Survey Report. Whilst the building inspection can be carried out at any time of year, emergence/re-entry surveys on built structures can only be undertaken during the core active bat season of May to August.

One tree is indicated for removal (a weeping goat willow), for management reasons (Eco Urban Arboricultural, Jan 2022). This tree should be assessed for roost potential as part of the updated survey, and included within the activity survey and/or mitigation strategy if suitable potential roost features are recorded.

In line with NPPF, I suggest that the following condition is added to the decision notice: *"A minimum of four bird boxes will be built into the exterior walls of the new buildings (two swift boxes, 2 house sparrow boxes/terraces) as per the recommendations in Section 5.6.1 of the Bat Survey Report. A minimum of two native trees will also be planted in the area of green space in the north-eastern corner of the site."* Reason: to enhance the biodiversity value of the site, in accordance with NPPF.

I hope the above advice is helpful and clear but please don't hesitate to contact me should you have any queries.

Kind regards,

Lynsey

**Dr Lynsey Robinson CEnv MCIEEM**

**Senior Ecologist**

**Ecology Team**

**Hampshire County Council**

Coronavirus (Covid-19)

Hampshire County Council's response to the Covid-19 is available here  
(<https://www.hants.gov.uk/socialcareandhealth/coronavirus>).