

Dear Selina,

APP/25/00081 | Application for a change of use of a vacant retirement home to provide temporary accommodation for homeless families in the borough of Havant. The proposed works include the remodelling and refurbishment of the existing two-storey building, together with the demolition of the existing lean-to canopy and conservatory, which are in poor condition, replacement boundary treatment and bin store building as well as alterations to fenestration. The proposal also includes the removal of overgrown mature trees along the site boundary, with replacement planting of native species to enhance biodiversity and provide new habitats for wildlife. | 54 Stockheath Road, Havant, PO9 5HQ

Thank you for consulting me on this application. The application is accompanied by an Ecological Impact Assessment (South Downs Ecology, July 2025), and a Biodiversity Net Gain Statutory Metric (Havant Borough Council, August 2025).

The site comprises a large, detached dwelling surrounded by expanses of hard surfacing, a small area of grassland and planted herbaceous and woody vegetation, and boundary coniferous trees. I am content that the site is of limited ecological value overall. In terms of ecological features, the dwelling has been shown to support a small Common Pipistrelle bat roost, confirmed by the observation of a bat beneath hanging tiles and then emerging from the building during surveys in May 2025. The applicant's ecologist is certain that the proposed works will not impact the identified bat roost and that a European protected species licence is not required. I have no reason to doubt this conclusion, and I would simply highlight that the avoidance of impacts to legally protected species is the responsibility of the applicant and their appointed agents. Should impacts be considered likely, it is for the applicant and their appointed agents to ensure that the requisite licence is obtained prior to any potentially disturbing works commencing.

The Biodiversity Net Gain assessment has been undertaken correctly. The submitted BNG metric calculations conclude that the proposed development will result in a habitat unit deficit of 0.34 and a hedgerow unit deficit of 0.12 which equates to -100% for each. No details are provided on the proposed landscaping for the site, and it is not therefore possible for me to comment on the suitability of any proposed habitat compensation measures. Presumably, the BNG deficit will be provided on site. It is not mandatory to provide details of final BNG measures at the application stage, although I would welcome future discussion around how the BNG obligation is to be met.

If you are minded to grant permission, can I suggest that all ecological measures are secured by the following conditions:

Development shall proceed in strict accordance with the ecological avoidance and mitigation measures detailed within the Ecological Impact Assessment (South Downs Ecology, July 2025) and Biodiversity Net Gain Statutory Metric (Havant Borough Council, August 2025) Reason: to protect biodiversity in accordance with the Environment Act 2021, Conservation Regulations 2017, Wildlife & Countryside Act 1981, NPPF, NERC Act 2006 and Policy CS 11 of the Havant Borough Core Strategy March 2011.

I would recommend that all BNG requirements are secured through condition. Recommended condition wording is provided below.

A Biodiversity Gain Plan shall be prepared in accordance with the Biodiversity Net Gain Statutory Metric (Havant Borough Council, August 2025) and must include:

- (1) *information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat;*
- (2) *the pre-development biodiversity value of the on-site habitat;*
- (3) *the post-development biodiversity value of the on-site habitat;*
- (4) *any registered off-site biodiversity gain allocated to the development and the value of that gain in relation to the development;*
- (5) *any biodiversity credits purchased for the development; and*
- (6) *any such other matters as the Secretary of State may by regulations specify.*

The development shall not commence until a Habitat Management and Monitoring Plan (HMMP), prepared in accordance with the approved Biodiversity Gain Plan, has been submitted to, and approved in writing by, the local planning authority. The HMMP shall include:

- (7) *a non-technical summary;*
- (8) *the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
- (9) *the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
- (10) *the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
- (11) *the monitoring methodology and frequency in respect of the created or enhanced habitat.*

Notice in writing shall be given to the Council when the:

- (12) *HMMP has been implemented; and*
- (13) *habitat creation and enhancement works as set out in the HMMP have been completed.*

The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

If you have any queries, please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

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