

Dear Arleta,

APP/25/00610 | Erection of a school theatre building and changing rooms to serve adjacent sports facilities, with associated landscaping, planting, and ancillary works. | Cowplain School, Hart Plain Avenue, Waterloooville, PO8 8RY

Thank you for consulting me on this application

I have reviewed the submitted Ecological Impact Assessment and Statutory Biodiversity Metric (both South Downs Ecology, July 2025). The site comprises an area of modified grassland, hard surfacing, two ornamental trees, plus some Bramble scrub. I am content that the site is of relatively limited ecological value overall in terms of habitats. The site is considered to offer limited potential for supporting protected and notable species.

In respect to bats, the two trees to be felled have each been assessed as offering bat roosting potential due to having '1-2 woodpecker holes each'. It is not clear why no further inspection of these features has been carried out in order to rule out bat impacts. The most recent Bat Conservation Trust bat survey guidance states that where potential roost features are present further works to establish use should be undertaken – further visual inspection followed by emergence survey if required. The proposal is to undertake searches immediately prior to felling, which is not in accordance with current best practice guidance. I would welcome clarification on why this approach to potential bat roosts is being proposed. If additional bat survey effort is necessary, this will need to be provided prior to a planning decision.

NPPF, Circular 06/2005 and Natural England Standing Advice, 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 Local Planning Authority prior to determination, particularly in the case of protected sites, habitats and species, which are a material planning consideration. This will enable the Local Planning Authority to determine the application on the basis of full knowledge about the potential ecological impacts of the proposal and to ensure that any impacts can and will be mitigated.

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 gain of 0.27 which equates to a 11.47% overall gain. The gain will be met through the planting of new trees and a condition uplift to modified grassland. These measures are acceptable.

Following clarification of the bat issue, and 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 mitigation and enhancement measures detailed within the Ecological Impact Assessment and Biodiversity Net Gain Statutory Metric (South Downs Ecology, July 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 (South Downs Ecology, July 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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