

Dear Ian,

**APP/25/00825 Erection of a new dwelling with associated drive and parking. 78
Durley Avenue, Waterloooville, PO8 8UZ**

Thank you for consulting me on this application. The application is accompanied by a Biodiversity Net Gain Small Sites Metric (Oliver Lewis/Joe's Blooms, 21 October 2025). I am unclear as to whether this proposal is eligible for Biodiversity Net Gain. The application forms states not but the reason for the stated exemption is not satisfactory. I would request further clarification on whether the applicant considers their proposal to be BNG exempt and, if so, to provide evidence that the exemption is valid.

The submitted BNG Metric does not include in its calculations the trees and shrubs to be removed to facilitate development. The submitted Arboricultural Impact Assessment (Fallen and Found, November 2025) states that several trees and groups of bushes are to be felled/removed. These features need to be reflected within the Metric baseline habitats calculations. I am unable to provide further comment until a complete BNG Metric is submitted in accordance with Schedule 7A of the Town and Country Planning Act 1990.

In addition, BNG is not on its own an assessment of potential ecological impacts. Where on site habitats may support protected or notable species these must be considered separately to BNG. In this instance, it is unclear whether the overgrown garden, trees and shrubs are suitable for supporting e.g. nesting birds. Further information is required.

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.

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

Kind regards,

Tristan

Tristan Norton

Principal Ecologist | E: tristan.norton@havant.gov.uk M: 07552 248974

Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX