

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, Waterlooville, PO8 8RY

Following on from recent correspondence from the applicant's planning advisor and consultant ecologist, I consider the clarification given on bat assessment methods to be acceptable. I acknowledge that the site is of limited overall value in terms of bat foraging habitat and that there is a high level of artificial light surrounding the trees. These are not necessarily overriding factors in the presence of bats within otherwise suitable features. We know from radio-tracking studies in the surrounding landscape that bats – including the rare Bechstein's Bat – use features in trees that might otherwise be dismissed as unsuitable due to their location and immediate surrounding habitat. I should also highlight that the site was first visited in April 2025, thereby providing ample time for any roost assessment surveys to have been conducted over the active bat season in summer 2025.

The above comments notwithstanding, and in the interests of expediency and proportionality, I am content to accept the justification provided. If you are minded to grant permission, can I suggest that all ecological mitigation and enhancement measures are secured by condition.

Development shall proceed in accordance with the ecological avoidance, mitigation and enhancement measures detailed within the Ecological Impact Assessment (South Downs Ecology, July 2025). In addition, the new building shall incorporate a minimum of two integral or externally mounted roosting units for bats, installed as per manufacturer's instructions. 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.

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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