

Ecology response for F/26/101924 Land to the Rear of 30 The Crescent, Eastleigh, SO50 9BR  
Retrospective change of use of land for Use Class B8 (storage) and extension to area of  
hardstanding.

Katie Lasham

4/10/26

More information required. Some measurable biodiversity enhancements are still required.  
Infiltration test results are required to show that surface water drainage by infiltration is  
possible on this site.

### **Biodiversity net gain**

This site has been cleared recently in advance of applying for planning permission, resulting  
in a loss of biodiversity. This is contrary to DM 11 which requires no net loss of biodiversity  
and some net gain.

The Environment Act 2021 requires public authorities to conserve and enhance biodiversity,  
including mandating a net gain in biodiversity through the planning system. The act also  
prohibits site clearance to reduce the baseline habitat value. If habitat is cleared before an  
application is submitted, the baseline habitat value of the site will be taken to be its  
biodiversity value immediately before the carrying on of the activities, as per Schedule 14 of  
the Environment Act 2021, Pt 1, Para 6a-b with a cut-off date of 30th January 2020. Where  
there is evidence of deliberate neglect or damage to any of the habitats and species, their  
deteriorated condition will not be taken into consideration, and the ecological potential of  
the site will be used to decide the acceptability of any development proposals.

The aerial photo of the site which is available on Google Earth shows a considerable amount  
of vegetation around the site boundaries as late as May 2025, with only the centre of the site  
impacted by vehicle use, and some vegetation remaining at the western end of the site in  
September 2025. The next most recent imagery is July 2026 which shows the site mostly  
cleared.

Additional photos of the site are available in the DAS by RS Studio (Rev A, September 2026).  
Figure 8 shows scrub and grassland, Figure 9 shows rough grassland and Figure 14 shows  
scrub and some grass next to a blue shipping container, which is on the other side of the  
gate from this site. Figure 4 shows the site completely cleared with a compacted limestone  
hardstanding in place, a total loss of biodiversity, as there is no longer any vegetation visible  
along the fence in this photo.

Section 3.2 of the DAS states

*3.2 Ecology The DEFRA and its data have been reviewed, and no further protected species were  
noted within or immediately surrounding the site. The site is undeveloped and cleared land.  
Given the lack of recorded findings, and the retrospective use, no further surveys were required.*

The DEFRA does not make sense. DEFRA is the Department for Environment, Food and Rural Affairs. It is possible that the applicant is referring to the DEFRA Magic Map which has some data on protected species licenses, but this is not comprehensive information and cannot be relied upon to demonstrate lack of habitat for protected species on site.

From the photos in the DAS, I can see that the scrub vegetation on site could have provided habitat for nesting birds. The site is adjacent to the railway line which is a known corridor for wildlife moving through the area. Data from the Hampshire Biological Information Centre (HBIC) shows records of hedgehogs, nesting birds and notable invertebrates in the area of this site. The habitat that was cleared could have been used by all of these species. There are also records of bats in this area which may have used the vegetation on this site for foraging for insects.

The size of the site is given as  $872.5\text{m}^2$  (0.83 ha) which is below the current 0.2 ha threshold for requiring 10% biodiversity net gain, but it is clear from the photos that more than  $25\text{m}^2$  of potential wildlife habitat (scrub and grassland) has been removed from the site.

### **Surface water drainage**

The drainage strategy technical note by RS Studios (September 2026) states that the surfacing used will permit rainfall to percolate through the surface and infiltrate into the underlying ground. However, there is no information to demonstrate that the underlying ground is permeable enough. As this site has been used for storage of heavy construction vehicles, the soil would be compacted and may not be able to drain naturally.

Infiltration test results are required to show that surface water drainage by infiltration is possible on this site.

Lisa Malter

Ecologist