

Additional Ecology response Nov 2023 for F/23/95549 BRIGHSTONE, BOTLEY ROAD, HORTON HEATH, EASTLEIGH, SO50 7DT

Construction of [5.no](#) dwellings, landscaping, parking and associated works following demolition of existing dwelling (bungalow, garage and 3 sheds), site clearance and preparation.

Gary Osmond

2/11/23

Ecology

I have reviewed the amended plans, PEA, Phase II Bat survey report and Biodiversity Net Gain Assessment reports by Ecosupport (revised September 2023).

In response to my previous concern about the loss of a brown long-eared bat roost the revised report (6.2.6 Roost Compensation) contains the following statement: *Adam Jessop (Principal Ecologist at Ecosupport Ltd, Class Licence Number 2015-13366- CLS-CLS) has previously been granted a Bat EPSL allowing for the destruction of one Brown Long-eared bat roost (within the loft of a building) under licence number 2021-54784-EPSMIT. Bat boxes were considered appropriate mitigation and compensation for the loss of this roost.* I have checked this with a colleague, and more information (such as relevant research or a statement from Natural England) will be required before we can agree whether or not this is acceptable. Otherwise, a dedicated loft space will need to be built to accommodate brown long eared bats with similar access and aspect to the roost that is being replaced.

Section 6.3.32 of the latest Bat Mitigation Guidelines describes dedicated bat roost provision for the loss of a brown long-eared bat roost and section 6.3.38 provides some information about the use of free-standing bat lofts such as those incorporating a car port or a garage. (Reason, P.F. and Wray, S. 2023. UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield, available at [Bat-Mitigation-Guidelines-2023.pdf \(cieem.net\)](#).)

This type of loft space could be achieved in the proposed car port for plot 2.

The updated lighting guidelines (GN08/23) should be used in section 6.3.1.

In the Biodiversity Net Gain Assessment, Monitoring and Management Plan, the condition assessment proforma (figure 4) should be updated to most recent version. This version is from metric 3.0, whereas the other documents in the plan refer to metric 4.0.

Planting 20 Urban trees has been proposed. They are shown very close together which may be detrimental to their success. The tree and landscape officers must check this plan to see whether so many trees can be so closely planted in this area.

The precautionary measures listed in the amended PEA & Precautionary Measures report (September 2023) are satisfactory.

A compliance check can be conditioned as recommended to ensure that all agreed mitigation and compensation has been provided.

Surface water drainage

The surface water drainage plan by GRK Architecture (P2, October 2023) shows soakaways proposed for surface water drainage from the buildings. The soakaways for plots 3 and 4 are very close to each other, and the soakaway for plot 5 is located within the root protection zone of a tree which is not acceptable. Soakaways need to be at least 5 m from any built structure. Building control need to be consulted to determine whether that also means 5 m from other soakaways. Infiltration testing is required to determine whether soakaways will be successful in this location, unless the current bungalow has a working soakaway.

Information has not been provided about surface water drainage for the road, driveways, and parking spaces. What surfacing materials are proposed? Will the surface water drainage from the road driveways and parking spaces also drain into the soakaways? Exceedance flows (using arrows) must also be shown. As previously requested, The simple index approach to pollution hazard mitigation must be followed, as shown in the CIRIA SuDS manual part E, p 568 -9, tables 26.2 and 26.3. The Simple Index Approach calculation tool is available on the Susdrain website (www.susdrain.org/resources/SuDS_Manual.html).

Lisa Malter

Ecologist