

Ecology response for F/25/99418 49 BISHOPSTOKE ROAD, BISHOPSTOKE, EASTLEIGH, SO50 6BF

Extension and alteration to existing dwelling to create 2nos. two-bedroom flats and 1no, one bedroom flat

Gary Osmond

13/6/25

Summary

I raise a holding objection to this application due to biodiversity net loss, contrary to Local Plan policy DM 11 and NPPF (December 2024) paragraphs 187d and 192 b. If the de minimis exemption from 10% net gain is applicable to this proposal, then measurements must be provided to demonstrate this. Some net gain will still be required.

A Habitats Regulations Assessment (HRA) is required to assess the impact of an increase in residential units on the River Itchen SAC and SSSI.

Biodiversity net gain

It is possible that this application may not need to provide 10% biodiversity net gain under the de minimis exemption, if the amount of habitat affected is less than 25m² of area habitat or 5 m of linear habitat. However, this would need to be demonstrated with accurate measurements of the habitat areas affected as shown on the habitat map.

The submitted Biodiversity Metric shows the following validation errors.

- The net gain for *area habitats* is -4.21%. It must be at least 10.0%.
- There are too many net losses of Low distinctiveness *area habitats*, and too few gains at higher distinctiveness categories to offset these losses.
The net change of Low distinctiveness *area habitats* is -0.0042 BU.

There is no evidence that any biodiversity net gain has been provided.

The application form lists the pre-development biodiversity value of onsite habitats as 0.1 (biodiversity units). It is not clear how this has been determined. The metric was not completed by a suitably qualified ecologist with an understanding of how biodiversity net gain must be demonstrated in accord with the Environment Act.

The Biodiversity habitats plan by the Landscape Service (April 2025) shows what appears to be a decrease in vegetated garden and an increase in developed land sealed surface, but the measurements of artificial unsealed surface have been listed as constant in the metric.

The DAS section on Biodiversity states that a Biodiversity report has prepared by Lowans Ecology and a Biodiversity Net Gain report by The Landscape Service have been included with the application.

There is an Ecological Impact Assessment report by a suitably qualified ecologist, but this is not the same as a biodiversity net gain report and does not address biodiversity net gain.

The only biodiversity documents I can find are the Biodiversity Metric which was completed by James Smith who is not an ecologist, and the 30-year Landscape Management plan by the Landscape Service (April 2025).

I have reviewed the 30-year Landscape Management plan. As this is a domestic garden, the management will be the responsibility of the landowner and will not be monitored by the local planning authority. There is no information in this plan that demonstrates biodiversity net gain.

Ecology

I have reviewed the Ecological Impact Assessment by Lowans Ecology (v 1, February 2025) originally submitted for the previous application. The survey information and recommendations are still appropriate, but the site plans are outdated. They do not need to be changed for the purposes of this application, but if ecological enhancements are being recommended by the ecologist they must be added to the most recent elevation plan and site plan.

The report states that no evidence of protected species was found on site. Trees T1 to T8 and T12 to T15 have potential bat roost features but the house and garage have no bat roost potential. Preventative mitigation measures and enhancements will be required to ensure no adverse effects/ long-term impact on bats, nesting birds, amphibians, otters and water voles due to this development.

Tree T26 (Cypress) is proposed to be removed and trees T3, T4, T5, T6, T7, T13 (all beech) and T15 (horse chestnut) will be reduced. A precautionary working method will be required to protect nesting birds and bats from harm during tree works. The Eastleigh Borough Council Tree replacement policy must be considered if mature or semi-mature trees are proposed to be removed or replaced. This can be found in the Trees and Development SPD available at [adopted-trees-and-development-spd-april-22.pdf](#).

If this application is permitted the following conditions and informative are recommended:

In the unlikely event of any bats being found during demolition or construction, all work must stop immediately, and Natural England must be informed. Additional information is available on the Bat Conservation Trust website at <https://www.bats.org.uk/advice/im-working-on-a-building-with-bats/ive-found-a-bat-during-works>.

The lighting used within the development will therefore adhere to the following: a) lighting will be directed to where it is needed through the design of the luminaire and by using accessories such as cowls or hoods, the boundaries and trees will not be lit, b) lights will not be on constantly throughout the night creating dark periods to allow bats to continue foraging without light spill affecting them, c) the lighting scheme will adhere to the latest guidance, as detailed in Guidance Note 08/18 Bats and Artificial Lighting in the UK. Bats and the built environment series, Bat Conservation Trust (London) & Institution of Lighting Professionals (Rugby) (2018).

The recommendations from the report were: lighting will be directed to where it is needed through the design of the luminaire and by using accessories such as cowls or hoods, the boundaries and trees will not be lit, and lights will not be on constantly throughout the night creating dark periods to allow bats to continue foraging without light spill affecting them.

New exterior lighting should be avoided, but if necessary for security purposes, then the latest updated lighting guidance note (GN08/23) should be followed. This is available at [Guidance Note 8 Bats and Artificial Lighting | Institution of Lighting Professionals \(theilp.org.uk\)](http://theilp.org.uk).

Section 6.2 lists the precautionary working methods to be followed during tree crown reduction if this is agreed by the tree officer. I recommend that the following information be added to the precautionary working methods. The recommendations in sections 6.4 through 6.10 are appropriate as written. The precautionary working methods must be included in a CEMP, which can be conditioned.

Vegetation affected by the proposal must be cleared outside of nesting bird season, with the recommendation in the report of works only to be done between September and February. If this is not possible, a suitably qualified ecologist must check for nesting birds no more than 48 hours before vegetation clearance.

If evidence of an active bird's nest is found before or during the works, work must stop, and a 5 m buffer must be erected around the nest to protect it from disturbance until after the chicks have fledged and left the nest.

Trees must be checked for evidence of bats immediately before the start of works, this must include a visual inspection by endoscope of any potential bat roost features. A toolbox talk for tree workers must also be provided by the ecological consultant, to make them aware of their responsibilities under the Wildlife and Countryside Act. They must be aware that bats could be roosting or hibernating in these potential roost features so the trees must be checked at all times of the year.

Habitat enhancements for bats, nesting birds including swifts, and hedgehogs have not been recommended in this report, although figure 21 does show an example of hedgehog access through the baseboards of a closed board fence. Planting for pollinators is also recommended to increase the availability of food for bats and birds.

The Bat Conservation Trust recommends installing a bat brick/box at least 4 m above the ground, away from artificial light sources, sheltered from strong winds and exposed to the sun for part of the day, facing south, south-east or south-west. (<https://www.bats.org.uk/our-work/putting-up-your-box>)

Swift nest boxes are best positioned under the eaves or on walls facing north, northeast or north-west out of direct sunlight, five metres above the ground, with clear adjacent airspace so swifts can access them in a high-speed direct flight. (<https://www.swiftconservation.org/Nestboxes%26Attraction.htm>)

Additional information is available at:

<https://sussexwildlifetrust.org.uk/discover/in-your-garden/article/31>, planting for bats

<https://www.wildaboutgardens.org.uk/sites/default/files/2022-03/WAG16%20Bats%20updated%202022%20WEB.pdf> - Stars of the Night guide to attract bats into your garden

<https://www.rhs.org.uk/science/conservation-biodiversity/wildlife/plants-for-pollinators>

<https://www.bats.org.uk/our-work/buildings-planning-and-development/bat-boxes>

<https://www.hampshireswifts.co.uk/nesting>

<https://www.rspb.org.uk/birds-and-wildlife/advice/how-you-can-help-birds/nestboxes/nestboxes-for-small-birds/>

<https://www.swift-conservation.org/OurLeaflets.htm>

<https://www.hedgehogstreet.org/help-hedgehogs/hedgehog-homes/>

www.bats.org.uk/resources/guidance-for-professionals/landscape-and-urban-design-for-bats-and-biodiversity

<https://ptes.org/my-garden/>

<https://www.ukbutterflies.co.uk/foodplants.php>

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