

Ecology response 31 7 25 for F/25/99364 Bright Horizons Day Nursery, Pomeroy Crescent, Hedge End, SO30 2LF

Erection of detached, single storey building

Clare Martin/ Gregg Chapman

31/7/25

Ecology

I have reviewed the Preliminary Ecological Appraisal by South Coast Ecology (July 2025). It provides a very good picture of the site and enhancements.

Please could you add the following informatives to the decision notice:

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>.

Any vegetation to be removed to facilitate the development must be removed outside of bird nesting season (which is usually between the beginning of March and the end of August). If this is not possible then vegetation can be cleared only after being checked for nesting birds by a suitably qualified ecologist up to 24 hours before the start of works. If any active nests are found, work must stop, and a 5 m buffer must be erected around the nest to protect it from disturbance until after the birds have fledged and left the nest.

Any excavations or open pipes will need to be covered at night, or provided with a small animal escape ramp (a rough board at a shallow angle) to allow animals to escape if they fall in. If animals are found on site, they should not be handled but must be allowed to move away to safety on their own.

The ecologist has recommended the following biodiversity enhancements: planting of native trees, native hedgerow, and a wildflower area and the addition of at least three bird boxes and one bat box. These can be agreed before determination or can be conditioned, with photos submitted showing these enhancements in situ to discharge the condition.

Biodiversity net gain

The biodiversity enhancements recommended in the PEA report will provide a net gain of 10.57% area habitat and 92.27% hedgerow units. The habitat must be managed according to the guidelines in the Habitat Management and Monitoring Plan (HMMP) by South Coast Ecology (July 2025).

Surface water drainage

I have reviewed the Drainage Strategy by ARP Associates (July 2025). It is not clear from this report whether or not infiltration will be a viable strategy for surface water discharged from this site, as infiltration testing has not been done. The report proposes that surface water will discharge through a flow control device to the nearest surface water sewer in Pomeroy

Crescent via existing connections. The existence of a local surface water sewer usually implies that infiltration is not possible in the area, however infiltration is usually the first choice of treatment, and should be investigated.

Attenuation storage is also proposed on site. Debris/leaf traps and silt traps are proposed for the surface water drainage from the roof. The report refers to more information being provided at the detailed design stage, but this is not a complex project, and it would be better to have the entire surface water drainage strategy agreed before determination, so it does not need to be conditioned. I would like to see a final surface water drainage strategy before determination, if possible, with the infiltration test results, the location and specification of any attenuation tank/pond, and an exceedance flow diagram. A temporary surface water management plan (as mentioned in 4.21) would not be required if the final plan was approved before determination.

Lisa Malter

Ecologist

11/6/25

I have reviewed the site photos with close ups of the shrubs, but it is not clear from the photos exactly what vegetation would be removed to accommodate the proposal, which is clearly larger than the existing building.

If there is no vegetation behind the existing shed, then it is not likely that a 9m length of hedgerow needs to be removed as mentioned in the Arboricultural Assessment. We need accurate information to be able to determine what is proposed.

From the photos this area could provide suitable habitat for nesting birds, foraging bats and possibly hedgehogs. The actual measurement of area habitat and linear habitat lost must be provided. These measurements can be annotated on a site plan in the first instance, however if the de minimus exemption is not applicable due to the amount of habitat lost, then it would be more efficient to have an experienced ecologist to provide the metric and proposed mitigation.

Lisa Malter

Ecologist

27/5/25

I raise a holding objection to this application on the grounds of inaccurate information provided on the requirement for 10% biodiversity net gain.

I have reviewed the documents submitted for this application. The Planning Statement by Verve Planning (May 2025) states that: *The application is exempt from providing the statutory 10% biodiversity net gain due to the de minimus exemption. The majority of the stand-alone building will be sited on existing hardstanding and therefore less than 25 sqms of on-site habitat will be lost. Nevertheless, a wildflower*

area is proposed to be planted in the front garden area of the day nursery to compensate for the limited removal of shrubbery along the northern boundary (to accommodate the new classroom building) thereby ensuring on site biodiversity improvements. Furthermore, in accordance with Policy DM11 of the Local Plan, Bright Horizons would be willing to provide a bird and bat box on site, full details of which can be secured by (pre-occupation) condition.

The Arboricultural Assessment by New Leaf Environmental Limited (Rev B, May 2025) states that the proposed location is within the RPA of T12 (oak), T11 (Pyrus) and a 9 m section of unmanaged hedge/shrub border H6, located beneath T12.

The de minimis exemption only applies to a development that does not impact a priority habitat and impacts less than 25 square metres (5m by 5m) of on-site habitat or less than 5 metres of on-site linear habitat such as hedgerows. [Biodiversity net gain: exempt developments - GOV.UK](#)

Linear habitat and area habitat must be considered separately for purposes of measuring biodiversity net gain under the Environment Act. They are not interchangeable, as implied in the Planning Statement.

The actual measurement of area habitat lost must be provided.

If a 9 m length of hedgerow (linear habitat) is proposed to be affected, then the de minimis exemption will not apply and 10% biodiversity net gain in linear habitat will be required.

The area of wildflower planting proposed for the front garden of the day nursery would qualify as area habitat and not linear habitat. These two habitat types cannot substitute for each other.

The aerial photo shows the area designated as the front garden is covered by trees, so a shade tolerant wildflower planting would have to be designed and implemented.

The small sites metric can be used to provide the baseline information required to calculate biodiversity net gain. If it is possible to plant an additional area of hedgerow along another site boundary this would be considered, although, looking at the aerial photo, I don't see where additional hedgerow could be added.

The provision of bird and bat boxes are considered biodiversity enhancement and would be acceptable enhancements for this site but are separate from the requirements for measurable 10% biodiversity net gain.

To determine whether a survey is required, **close-up** photos of the existing shed, the area of vegetation proposed to be removed, and the trees proposed to be pruned

must be submitted for review. This area is shown in Figure 2 of the Arboricultural Assessment, but no other close-up photos of the area impacted by this proposal have been supplied.

Works to the hedgerow, shrubs and trees can only be done outside of bird nesting season (usually considered to be from February through the end of August) or immediately after a check by a suitably qualified ecologist. The trees must also be checked for potential bat roost features (PRFs). If any PRFs are present in the area of impact, they must be checked by a bat-licensed ecologist.

A surface water drainage plan for the proposed building will also be required.

Lisa Malter

Ecologist