

Ecology response for F/25/100042 54 DENZIL AVENUE, NETLEY ABBEY, SOUTHAMPTON, SO31 5BA

Demolition of two flats to be replaced by a two-storey pair of semi-detached dwellings and ancillary works including new (second) access.

Gregg Chapman

23/10/25

There are records of bats, nesting swifts and hedgehogs near this site. The photo of the site on Google maps (imagery 2025) shows that the majority of the garden was covered in vegetation with hedgerows along the northern and eastern site boundaries. The site had been cleared to bare soil and hard standing before submission of the planning application. The pre-clearance condition must be used as the baseline in accord with the Environment Act 2021.

Ecology

I have reviewed the Ecological Impact Assessment and Biodiversity Net Gain report by 4Woods Ecology (August 2025).

A walkover survey of the site was done on 15 May 2025. The building was assessed to have low-moderate bat roost suitability, and two emergence surveys were done (July and August 2025). No bats emerged during the surveys and are presumed likely absent.

As the site had been cleared to bare soil and concrete hardstanding with a small patch of unmanaged lawn grass at the rear garden, it is not likely that other wildlife will be using the site before development.

Please could you add the following informative 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>.

As the interior of the building was not able to be accessed by the surveyors, all construction staff must be informed of how to recognise signs of bats and exactly what to do if bats are found during demolition.

The mitigation and ecological enhancements recommended in the report (section 4.4) are appropriate and must be implemented. These include Lighting in section 4.4.1 and Ecological Enhancements in section 4.5 with their locations as specified on Map 3.

Exterior lighting must be minimised, not shine on any areas that could be used by bats and conform to the guidelines in [Guidance Note 8 Bats and Artificial Lighting | Institution of Lighting Professionals \(theilp.org.uk\)](#).

The planting must include a variety of plants for pollinating insects (also used as food for bats and swifts) that flower over a long season. The planting specifications can be agreed before determination or can be conditioned.

Additional information on suitable plant species 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>

Biodiversity Net Gain

The Small Sites BNG metric has been submitted with this application. The pre-clearance baseline has been used which is appropriate.

The total site area is 444 m², with a baseline of 0.0455 area habitat units and 0.0325 hedgerow units.

The post development proposal would provide 0.0386 area habitat units and no hedgerow units.

The purchase of off- site biodiversity units or biodiversity credits are proposed to meet the shortfall of 0.0114 area habitat units and 0.0358 hedgerow units.

Analysis of the submitted metric has the following errors:

- The net gain for *area habitats* is -15.11%. It must be at least 10.0%.
- The net gain for *hedgerows* is -100.0%. 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 -0.0069 BU.
- There are too many net losses of Very Low distinctiveness *hedgerows*, and too few gains at higher distinctiveness categories to offset these losses.
The net change of Very Low distinctiveness *hedgerows* is -0.033 BU.

To eliminate the errors in the metric and satisfy the trading rules, the proposal of either units or credits must be provided.

The intent to purchase units or credits must be agreed before determination and the applicant must provide evidence that they are able to purchase units or credits and are aware of the costs involved.

The purchase of units or credits would not be finalised until after planning permission is granted as explained in the Biodiversity Planning Guidance Note available at [Ecology and](#)

[Biodiversity Net Gain for Planning Applications](#). Proof of purchase of units or credits would be conditioned.

Section 5.3.6 states The Small Sites Metric cannot be used if there are any priority habitats on site (excluding hedgerows and arable field margins) or if off-site biodiversity net gain is proposed, however in this case, the small sites metric was already commissioned and submitted so a full metric will not be required at this point.

Surface Water Drainage

Surface water drainage information is required before determination. As this is a replacement for an existing dwelling, it may be possible to use the existing system, but evidence that it is functional and sufficient for both new dwellings would need to be confirmed before determination. The car parking and driveways will need to be permeable paving to filter any runoff before it enters the existing system in accord with the requirements of DM6.

Lisa Malter

Ecologist