



Unit 4, Langham Stables, Langham Lane, Lodsworth, Petworth, West Sussex, GU28 9BU.

Tel: 01798 861 800 - E-Mail: info@ecologyco-op.co.uk - Website: www.ecologyco-op.co.uk

9th September 2026

David Raper
Planning and Building Control
Hart District Council
Harlington Way
Fleet, GU51 4AE
By email: planningadmin@hart.gov.uk

Dear Mr Raper

Application 26/01201/OUT — Land at Murrell Green, London Road, Murrell Green, Hook
Outline application for phased residential-led mixed-use development of up to 2,160 dwellings
Representation on ecological matters on behalf of Winchfield and Hook Parish Councils

1. Introduction and status of this representation

The Ecology Co-op has been instructed by Winchfield Parish Council to review the ecological information submitted in support of the above application. This letter sets out our conclusions on matters where, in our professional opinion, the submitted Environmental Statement does not provide an adequate evidential basis for the conclusions it reaches, and where the Council is therefore not presently in a position to determine the application.

This representation has been prepared by Paul Whitby BSc (Hons) MCIEEM CEng, Managing Director and Principal Ecologist at The Ecology Co-op, and a Natural England bat licence holder (BER0290 and BMCL RC227). It is informed by a review of the submitted documents and by a site visit undertaken by the author.

Our review has focused on the documents listed below:

- ES Chapter 8: Ecology (document 016);
- ES Appendix 8.9: Ground Level Assessment for Potential Roosting Features for Bats (document 091);
- ES Appendix 8.10: Bats — Structures and Activity (document 092);
- BNG and SANG Report V1, Ethos Environmental Planning, June/July 2026 (document 066);
- SANG and SAMM Mitigation Statement R006v1, Pegasus Group, 17 June 2026 (document 002D);

- SANG Areas Plan, Loop Provision Plan and Context Plan (documents 071, 072, 074);
- Consultation response of Natural England dated 18 August 2026 (ref 554684); and
- Consultation response of Hampshire and Isle of Wight Wildlife Trust dated 13 August 2026.
- The Submitted Statutory Biodiversity Metric

Three principal objections have been set out below, followed by a number of further matters arising from the same documents. In summary, we consider that the ecological evidence base is insufficient to support the residual effect conclusions reached, that the assessment of impacts on Annex II bat species is unsubstantiated, and that the Suitable Alternative Natural Greenspace has not been demonstrated to be capable of performing its mitigation function. On that basis the Parish Council invites the Council either to require the further information identified in this letter under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, or to refuse the application.

2. The potential presence of Bechstein's bat remains unknown, and impacts can therefore only be assumed

2.1 Details gathered from submitted information

Appendix 8.10 records that sixteen bat species were returned by the desk study within 4 km of the Site, expressly including Bechstein's bat *Myotis bechsteinii*. It further records that seventeen species were identified from the 2025 static detector data, again including Bechstein's bat, with 131 records returned across the survey season.

At paragraph 1.7.1 the appendix concludes that the numbers of greater horseshoe, lesser horseshoe and Bechstein's bat “were insignificant”. Chapter 8 carries that forward at paragraph 8.4.11, concluding that these Annex II species were “recorded at low levels, indicating occasional use of the Application Site for foraging and commuting”. On that basis Bechstein's bat is not carried through as a receptor in the impact assessment; barbastelle alone is assessed.

Critically, however, Appendix 8.10 also reports at Section 2.1 that advanced bat survey work undertaken in 2017 on this Site involved trapping and radio-tracking, and that radio-tracking identified four tree roosts from three tagged bats — one of which was a Bechstein's bat. Two of those four roosts were located within woodland on the Site itself, and two within off-site woodland approximately 2 km away. Ten species were confirmed in the hand during the 2017 trapping, and breeding females were confirmed for seven species. Taken with the barbastelle maternity roost identified approximately 2 km to the south-west, this indicates that the Site lies within the core sustenance zone of a breeding barbastelle population, and within the roosting range of Bechstein's bat, whilst given the age of this report (which is not provided, but only referenced) it remains possible that breeding Bechstein's bat could be present.

2.2 Adequacy of the existing assessment

The applicant is therefore in possession of evidence that Bechstein's bat has been caught in the hand on this Site and radio-tracked to a tree roost, and that tree roosts used by tagged bats were found within the Site boundary. Notwithstanding that, the 2026 Environmental Statement characterises the species as making no more than “occasional use” of the Site and omits it from the impact assessment. We can identify no reasoned justification in the submitted documents for that departure from the applicant's own earlier survey findings.

No trapping, no acoustic lure work and no radio-tracking has been undertaken as part of the 2025 survey programme and no updated assessment has been provided for 2026. The 2025 work comprises building

inspections, a restricted ground level assessment of trees, three nights of night-time walkover transects and monthly static detector deployments. In consequence, the current status of Bechstein's bat on the Site — whether it is present, whether it roosts on the Site, whether a colony is associated with the Site, and where — is simply unknown. Any impact on the species is therefore assumed rather than assessed, for a major development.

This matters because the recognised survey method for the species is not acoustic. As the People's Trust for Endangered Species records, the established approach involves attracting and trapping individuals using an acoustic lure, precisely because "*conventional monitoring with a bat detector is difficult*" for this species. The acoustic lure method used by the National Bechstein's Bat Project derives from Hill and Greenaway (2005), whose synthesised stimulus was modelled on a social call of Bechstein's bat. In that study the lure captured 23 bats of four species, including six Bechstein's, against a single bat in the control condition. The technique falls within the advanced survey methods addressed by Collins (2023), the fourth edition of the Bat Conservation Trust guidelines that Appendix 8.10 cites as its own methodological basis. Bechstein's bat is a woodland specialist that echolocates quietly, at low amplitude and is consequently under-recorded by static and transect acoustic survey. A survey design that relies on acoustic data alone cannot establish the absence of the species, and cannot support a conclusion that its use of a site is merely occasional.

2.3 Automated identification of *Myotis* calls to species level is inconsistent with good practice

Appendix 8.10 states the correct position at paragraph 1.7.2: "*Myotis species calls are highly similar to each other and may not be accurately identified to species level by acoustic analysis, particularly by automatic software and therefore have been grouped together and referred to as *Myotis* spp.*" The appendix also records that all calls were processed using the British Trust for Ornithology Pipeline classifier, with results below 50% confidence excluded.

The results presented clearly do not follow that stated methodology. Table 5 of Appendix 8.10 reports species-level totals for Bechstein's bat (131), Brandt's bat (115), Daubenton's bat (5,724), Natterer's bat (2,477) and whiskered bat (1,872), and separate totals for brown long-eared bat (2,530) and grey long-eared bat (352). No *Myotis* spp. or *Plecotus* spp. category appears in the results table at all. The methodology says the genus was grouped; the results table splits it to species. The species-level figures on which the assessment relies are therefore machine classifications that the appendix itself states cannot be relied upon.

This is more than a presentational inconsistency, because the classifier output contains records that are not credible on distributional grounds. The dataset returns 352 grey long-eared bat records — a species confined to a small number of colonies on the south coast and among the rarest mammals in Britain. The presence of this species in these numbers and indeed the implied presence of 17 bat species would theoretically make this site one of **national significance**; it is far more likely that these determinations are false positives, however the Environmental Statement fails to realise this.

The technical literature is clear on the point. Russ (*British Bat Calls: A Guide to Species Identification*, Pelagic Publishing) sets out that the *Myotis* genus cannot be separated reliably to species level from echolocation calls alone: the call structures of Bechstein's, Natterer's, Daubenton's, whiskered and Brandt's bats overlap extensively in frequency, duration and shape, and reliable determination requires either capture in the hand or, at best, expert manual analysis of high-quality recordings of known behavioural context.

Collins (2023) introduced specific guidance on auto-identification for bat sound analysis. The species-level treatment of *Myotis* in Table 5 departs from the guidance in the very document that Appendix 8.10 cites as the basis for its methodology.

The consequence cuts both ways, and both are fatal to the assessment as presented:

- the 131 “*Bechstein's*” records cannot be relied upon as evidence that the species is present; **and equally**
- the small number of those records cannot be relied upon as evidence that its use of the Site is insignificant, because the method is not one that reliably detects the species in the first place.

Either way, presence and use remain undetermined. It is a well-established principle of development control that the presence or otherwise of a European protected species, and the extent to which it may be affected by a proposal, should be established before planning permission is granted, and not deferred to a subsequent stage. The Environmental Statement does not meet that requirement in respect of Bechstein's bat.

3. The barbastelle data are significant, but the assessment of impact upon them is unsubstantiated

3.1 The scale of recorded activity

Appendix 8.10 records 3,009 barbastelle passes across the 2025 static survey season, with barbastelle detected at every one of the twenty detector locations deployed. Chapter 8 assesses the Annex II component of the assemblage as being of **national importance**, and identifies the Site as providing functionally important commuting habitat, with nationally important barbastelle commuting routes. That conclusion is not in dispute. Hampshire and Isle of Wight Wildlife Trust reaches the same view in its objection of 13 August 2026.

Read together with the 2017 advanced survey results reported at Section 2.1 of the same appendix — trapping, breeding female barbastelle confirmed in the hand, two barbastelle radio-tagged, roosts identified within on-site woodland, and a barbastelle maternity roost of 14 bats confirmed in woodland to the south-west of the Site — the picture is not one of incidental landscape-scale passage. It is one of a Site lying clearly within the core sustenance zone of a known maternity colony identified from 2017.

The Bat Conservation Trust ascribes barbastelle a core sustenance zone of 6 km — the largest of any British species — defined as the area surrounding a communal roost within which habitat availability and quality will have a significant influence on the resilience and conservation status of the colony. Appendix 8.10 itself adopts a 7 km nightly foraging radius for the species at paragraph 1.7.6. A maternity roost approximately 2 km from the Site therefore places the entire application site squarely within the colony's core sustenance zone on either measure.

3.2 Without trapping and radio-tracking, the significance of the impact cannot be known

Chapter 8 concedes at paragraph 8.8.23 that the development will cause “*fragmentation of commuting corridors associated with the wider network of hedgerows, linking up foraging habitats, local roosting resources as well as seasonally important roost locations for swarming, breeding and hibernation*”. The Environmental Statement thus expressly identifies effects on breeding, swarming and hibernation roosts — while nowhere identifying where any of those roosts are.

The applicant's position on the roost resource rests on two propositions. The first, at paragraph 8.4.9, is that the Site forms part of a network “*likely connecting to offsite roost locations*”. The second, at paragraph 8.4.10, is that “*historic radio tracking studies within the wider landscape*” have previously identified movement routes and foraging areas. Neither proposition is a substitute for current data. No trapping has been undertaken. No bats have been radio-tracked to a roost. No current roost has been located,

characterised or counted. Nor does Chapter 8 disclose the 2017 trapping and radio-tracking results in any substantive way, despite that work having identified two tagged-bat roosts within the Site boundary and a barbastelle maternity roost of 14 bats approximately 2 km to the south-west.

The practical consequences are that the Environmental Statement cannot, and does not:

- define the core sustenance zone of the colony or colonies using the Site, and therefore cannot establish what proportion of that zone is lost to development;
- demonstrate that the corridors to be severed or illuminated are not the principal or sole routes between the roost and its foraging grounds;
- assess the effect of operational lighting on roost egress and on the first and last legs of the commuting route, which is where light-sensitive species are most vulnerable;
- establish whether any of the trees proposed for removal, or any tree within the lighting or disturbance envelope, is in current use as a maternity, swarming or hibernation roost; or
- establish whether an offence under the Conservation of Habitats and Species Regulations 2017 is likely, or whether the tests for a European Protected Species licence could be met.

A judgement that residual effects on a nationally important population of an Annex II species will be *“Neutral (Not significant)”* — as Chapter 8 concludes for operational lighting, fragmentation and urbanisation, reduced from *“Major Adverse (Significant)”* before mitigation — cannot be reached without this information. In our opinion that conclusion is unsubstantiated and should be given no weight.

3.3 Detector failures create a material gap in the dataset

Chapter 8 acknowledges at paragraph 8.3.4 that *“a small number of detectors failed during deployment across several survey periods”*, but states that *“sufficient spatial and temporal coverage was achieved”*. Table 1 of Appendix 8.10 records nine detector failures: P2, P3 and P13 in April; P8 in August; P1, P14, P15 and P20 in September; and P9 in October. Approximately one in eight of the planned detector-nights was therefore lost.

The losses were not, however, randomly distributed with respect to the barbastelle question, and two are of direct significance:

- Location 8 recorded 752 barbastelle passes — 24.9% of all barbastelle records on the Site, and by a wide margin the highest of any detector. The detector at that position appears to be the one that failed for the whole of the August deployment. The single most important barbastelle location on the Site is therefore missing a full survey period, in late summer.
- September is the month the appendix identifies as the barbastelle peak, with 1,132 passes, and the month from which it infers *“dispersal to swarming sites”*. However, four detectors failed in that month, reducing coverage to sixteen of twenty positions.

There is a related and more serious problem with the temporal analysis. The September deployment ran from 5 September to 7 October 2025 — a 32-night deployment, against deployments of five to seven nights in every other month. Approximately 43% of all detector-nights in the survey therefore fall within that single month. The monthly totals presented in the appendix, and the figures derived from them, are raw counts and are not normalised for that difference, notwithstanding the note at paragraph 1.7.10 stating that activity was expressed as a mean per night.

When the barbastelle data are normalised, the pattern relied upon inverts. September yields approximately 2.2 barbastelle passes per detector-night (1,132 passes over roughly 512 detector-nights), whereas the

remainder of the season yields approximately 2.8 passes per detector-night (1,877 passes over roughly 671 detector-nights). September is not the seasonal peak at all; it is below the average for the rest of the season, and the apparent peak is an artefact of a deployment five to six times longer than the others. It follows that:

- the inference that activity is concentrated in an autumn dispersal period, and that the Site is accordingly used for transit rather than as core habitat, is not supported by the data as presented; and
- barbastelle activity was in fact sustained at a higher rate through the breeding season, which is consistent with the Site forming part of the core sustenance zone of a maternity colony rather than a seasonal dispersal route.

We would ask that the applicant be required to provide the raw static detector dataset, normalised per detector-night, together with the times of first and last recorded barbastelle activity relative to sunset at each location. Emergence timing is the cheapest available test of roost proximity: barbastelle recorded within a few minutes of sunset indicates a roost close at hand, and that analysis has not been presented. Acoustic data of this kind cannot count animals, but they can be interrogated temporally, and that analysis has not been attempted.

3.4 Barbastelle use a wide range of habitats, and the dismissal of the grassland is not evidenced

Appendix 8.10 discounts the great majority of the habitat loss on the basis, at paragraph 3.6.3, that the development “*will result primarily in loss of areas of modified grassland and other neutral grassland pasture, which are of low value for barbastelle*”. The BNG and SANG Report puts the scale of that loss at **126.06 hectares of area-based habitat** — approximately two thirds of the 187.15 hectares of habitat recorded at baseline.

We do not accept that a habitat can be written off as being of low value to barbastelle solely on the basis of recorded acoustic activity within it. Acoustic activity measures where bats fly; it does not measure where their prey is produced. Zeale *et al.* (2012) found that, alongside riparian zones and broadleaved woodland, unimproved grassland and field margins formed an important component of barbastelle foraging habitat. The prey base of a barbastelle colony is a function of the whole habitat mosaic — hedgerow bases, field margins, rough and grazed grassland, wet ground and their associated larval foodplants — and not only of the linear features along which the bats commute.

Barbastelle also use different components of the landscape at different times of the year, for foraging, for swarming and for hibernation, as Chapter 8 itself acknowledges at paragraph 8.8.23. The permanent loss of 126 hectares within the core sustenance zone of a maternity colony is capable of being a significant effect through prey depletion alone, irrespective of whether the bats were recorded flying over that ground. The ES has no evidential basis for the conclusion that the loss is of low consequence for the species.

3.5 Severance of Brenda Parker Way

Brenda Parker Way crosses the centre of the Site as a sunken, tree-lined double hedgerow route. During a site visit the sunken character of the path was notable: it provides a sheltered, dark, low-level flight line with a substantially closed canopy, which is precisely the structural condition selected by barbastelle and by Bechstein's bat, and its mature boundary trees and banks additionally offer roosting potential. Such link features have been identified to have particular importance for example for Barbastelle bat populations associated with the Ebernoe Common SAC and The Mens SAC in Sussex, which both support important breeding populations of this species.

The applicant's own data confirm the importance of the feature. Detector Location 8 is described in Appendix 8.10 at paragraph 1.7.6 as sited "within a double hedgerow along a footpath between London Road and Old Potbridge Road", and is grouped in the preceding paragraph with Totters Lane and Brenda Parker Way. That location returned:

- 752 barbastelle passes — 24.9% of all barbastelle records on the Site, the highest of any detector position; and
- approximately 35,700 bat passes in total, one of the three busiest positions on the Site.

Appendix 8.10 accordingly identifies Brenda Parker Way, at paragraphs 2.2.11 and 3.6.19, as among the key features to protect and as a primary ecological constraint on the masterplan, and Chapter 8 does likewise at paragraph 8.16.10.

Notwithstanding that, Appendix 8.9 records that new road infrastructure will cross this feature in at least two places, and that mature trees supporting potential roost features will be felled to accommodate it:

"Road intersection Brenda Parker Way, west of fishing lakes" — trees to be removed include:

- G6b, pedunculate oak, 80 cm DBH (large) — 3 potential roost features (PRF-I);
- G6c, beech, 60 cm DBH — 1 PRF-M, described as a ramshorn with a large cavity, requiring aerial inspection; and
- G6e, goat willow, 50 cm DBH — 2 PRF-Is with potential to decay to PRF-Ms.

"Road intersection Brenda Parker Way, south of fishing lakes" — trees to be removed include:

- G7, pedunculate oak, 190 cm DBH, recorded by the applicant as a veteran tree, with exposed roots, hollowing and decay into the trunk and two PRF-M features. The table records no photographs and, so far as we can read it, no further survey.

We draw two conclusions from this. First, the assertion at paragraph 3.6.23 of Appendix 8.10 that *"the arrangement of development parcels ensures that key commuting routes are not severed"* is not correct on the applicant's own drawings and tree schedules. It is also contradicted within the Environmental Statement itself: Chapter 8 at paragraph 8.14.15 requires bats to be encouraged *"to crossroads at height"* and states that *"detailed design of road crossings along key bat commuting routes will be informed by the findings of additional bat activity surveys"*. A scheme in which no key commuting route is severed does not require crossing points designed on key commuting routes.

Second, the impact on roosting resources along this route has not been identified, let alone assessed. The trees listed above sit on the feature carrying approximately one quarter of the recorded barbastelle activity on the Site. They include a veteran tree with two PRF-M features. Their status as roosts is unknown, because the survey required to determine it — aerial inspection, and where appropriate emergence and re-entry survey — is deferred to a point after permission would have been granted. Should (for example) these PRF-M features support a barbastelle bat maternity roost (which is entirely possible based on the known presence of the species, level of activity and habitat value), this would pose a national scale of impact.

We would add that the scope of the ground level assessment compounds this. Appendix 8.10 records at paragraph 1.1.11 that woodland parcels were *"scoped out due to buffers incorporated into the design, as were most of the trees in hedgerows, which would also be buffered"*. The roosting resource along the retained length of Brenda Parker Way has therefore not been assessed at all, on the assumption that a design buffer removes the need to know what is there. That assumption is not tested anywhere in the Environmental Statement, and it is not one we consider can properly be made for a light-sensitive Annex II species adjacent to 2,160 dwellings.

These matters engage Policy N2 of the National Planning Policy Framework published on 17 August 2026, which at N2(1)(f) requires development proposals to "[m]inimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs", and at N2(1)(a) and (d) to conserve and enhance existing natural features of nature conservation value, including established trees and hedgerows, where possible. Barbastelle and Bechstein's bat are both species of principal importance listed under section 41 of the Natural Environment and Rural Communities Act 2006, and bats are named expressly in the policy.

An obligation to minimise adverse impacts cannot be discharged without first establishing what those impacts are. Avoidance cannot be designed around roosts which have not been identified, and compensation cannot be scaled to a population whose use of the Site is unknown. On the evidence presently before the Council, the severance of Brenda Parker Way and the loss of the trees listed above cannot be shown to satisfy Policy N2(1)(f), (a) or (d).

4. The value of the proposed SANG is undermined by its proximity to major road infrastructure

The SANG and SAMM Mitigation Statement proposes 58.2 hectares of Suitable Alternative Natural Greenspace across three parcels, against a policy requirement of 41.5 hectares, with principal circular routes of 2.4 km and 2.5 km in SANG Areas 1 and 2. The BNG and SANG Report describes the SANG as provided "*across linked areas to the west and south of the M3 / railway corridor*". The Site itself lies immediately south of the A30 London Road, is crossed east to west by the South West Main Line, is bounded to the east by the B3016 Odiham Road, and takes three vehicular accesses from the A30 and one from the B3016.

Natural England's *Guidelines for the Creation of Suitable Alternative Natural Greenspace* (2021) require, among other things, that a SANG have a semi-natural aspect with site infrastructure kept to a minimum, and that there be no unacceptable visual and sound intrusions from the built environment and infrastructure such as roads and railways. That is not a peripheral design preference: the function of a SANG is to be sufficiently attractive that residents choose it in preference to the Thames Basin Heaths, and a greenspace subject to persistent traffic noise will not achieve that.

In its consultation response of 18 August 2026 Natural England has already concluded that the SANG as designed does not satisfy the 2021 guidelines, citing among its reasons the requirement that there be no unacceptable visual and sound intrusion from roads and railways, together with the circular walk, path separation and semi-natural character requirements. Natural England requires a revised SANG design and a site visit before the SANG can be accepted as mitigation, and states that without that information it may need to object.

We support that position and would put it more strongly. Neither the SANG and SAMM Mitigation Statement, nor the BNG and SANG Report, nor the SANG plans contain any acoustic assessment of the proposed SANG areas. A site visit in August confirmed that traffic noise is significant within much of the area proposed as SANG.

The Thames Basin Heaths Special Protection Area is a habitats site. Under the National Planning Policy Framework published on 17 August 2026, development proposals affecting a habitats site fall to be determined under Policy N6(1)(a), in Chapter 19. That policy provides that such proposals should be refused unless either an appropriate assessment has concluded that the proposal "*will not adversely affect the integrity of the site (either individually or in combination with other developments)*", or the proposal can satisfy the derogation tests; and/or the impact on the relevant protected features is being addressed

through an Environmental Delivery Plan from which the developer has committed to paying the nature restoration levy.

The second limb is not engaged. No Environmental Delivery Plan covering the Thames Basin Heaths is relied upon in this application, and no commitment to a nature restoration levy is offered. The applicant's case rests entirely on the first limb, and therefore on the adequacy of the SANG as avoidance and mitigation.

That case cannot presently be made out. Natural England has concluded that the SANG as designed does not satisfy its 2021 guidelines, has required a revised design and a site visit, and has stated that without that information it may need to object. The Council therefore has before it the statutory adviser's conclusion that the mitigation on which the proposal depends is not yet acceptable. It follows that no appropriate assessment can presently conclude, to the standard required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 and by Policy N6(1)(a), that the development would not adversely affect the integrity of the Special Protection Area. In those circumstances Policy N6(1)(a) directs refusal.

5. Further matters arising

The following further points arise from the same documents and, in our view, require resolution before determination.

5.1 The claim that no irreplaceable habitat is lost is contradicted by the applicant's own tree schedule

The BNG and SANG Report states at paragraphs 2.4.7 and 3.4.3 that *"No irreplaceable habitat is lost"*. Appendix 2 to that report, the Irreplaceable Habitats Register, lists only three parcels of ancient woodland totalling 6.76 hectares, all retained or enhanced in situ, and carries the caveat that *"if any ancient or veteran trees are confirmed through arboricultural assessment, these should be added to this register and treated as irreplaceable habitat for BNG purposes"*.

Appendix 8.9 has already confirmed at least one. Tree G7, a pedunculate oak of 190 cm DBH at the Brenda Parker Way road intersection south of the fishing lakes, is recorded by the applicant's own ecologists as a veteran tree, and is scheduled for removal. A second, G11, a 190 cm oak south of Ringwood Copse, is recorded as a *"potential veteran tree (to be surveyed)"* with its features and further survey requirement left as *"tbc"*. A third, G9a, is described as a veteran tree with a large trunk cavity and three PRF-M features. Chapter 8 and the BNG report both refer to veteran trees being present on the Site.

For completeness, G11 and G9a fall within Appendix 8.9's schedule of trees subject to potential indirect impacts rather than removal. That does not take them outside Policy N6, which addresses the loss *or deterioration* of irreplaceable habitat: two retained veteran trees within the lighting, disturbance and recreational envelope of 2,160 dwellings engage the second limb of that test.

The loss of a veteran tree is the loss of irreplaceable habitat. Under the National Planning Policy Framework published on 17 August 2026, this is governed by Policy N6 (Areas of particular importance for biodiversity and geodiversity), paragraph 2, in Chapter 19 (Conserving and enhancing the natural environment). That policy provides that, irrespective of a site's status in nature conservation terms, development proposals which would entail the loss or deterioration of irreplaceable habitats — expressly including ancient woodland and ancient or veteran trees — are to be refused unless there are "wholly exceptional reasons" and "a suitable compensation strategy exists". The accompanying footnote illustrates "wholly exceptional reasons" by reference to infrastructure projects, including nationally significant infrastructure projects,

orders under the Transport and Works Act and hybrid bills, where the public benefit would clearly outweigh the loss. A market-led residential scheme is plainly not development of that character.

The Environmental Statement neither identifies the loss of a veteran tree nor advances any case under that test. No wholly exceptional reasons are advanced, and no compensation strategy for irreplaceable habitat is offered. The only compensation proposed in relation to the trees to be felled is that at paragraph 3.7.19 of Appendix 8.10 — "integrated bat boxes ... on a like-for-like basis" for lost potential roost features. Bat boxes address, at best, the loss of a roosting feature. They do not begin to compensate for the loss of a veteran tree, which is irreplaceable precisely because its cavities, decay habitats, saproxylic invertebrate assemblage and epiphyte communities cannot be recreated within any meaningful timescale, and they are not proposed as compensation for that loss. Policy N6 is therefore engaged and, on the material submitted, not satisfied.

5.2 The biodiversity net gain margin is negligible and the treatment of irreplaceable habitat requires confirmation

The whole-site statutory metric returns a net change of +10.2% in habitat units (696.60 to 767.72), against a statutory minimum of 10%. That is a margin of 0.2 percentage points, or approximately 1.4 habitat units, on a calculation that turns on professional judgement of habitat condition across 187 hectares and on the delivery of habitat creation and enhancement over thirty years. A margin of that size provides no confidence that the statutory minimum would in fact be achieved, and no headroom for the downward adjustments that would follow if, for example, a veteran tree were correctly entered on the irreplaceable habitats register, or if any condition assessment were revised.

Of particular note is the treatment of irreplaceable habitats within the metric. There are three ancient woodland habitats recorded in the metric on sheet A-1 at habitat reference rows 69, 80 and 84. One of these rows includes ancient woodland identified for enhancement from poor to moderate condition, despite the ES chapter identifying that with the implementation of mitigation, the effects of the development on ancient woodland would result in 'minor to moderate adverse effects'. The Applicant is therefore stating that there will be woodland deterioration even with mitigation in place, while conversely the metric is claiming there will be an enhancement from poor to moderate condition.

For the other two parcels, the biodiversity units in the metric are not generated, which is due to an approach taken under Regulation 3 of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, which excludes Irreplaceable habitat and instead provides for "a compensation plan in place that secures appropriate compensation relative to the baseline habitat type, and which does not include the use of biodiversity credits."

However, Regulation 4 states that "Regulation 3 does not apply in relation to — (a) the grant of outline planning permission, where the reservation of matters for subsequent approval has the effect of requiring or permitting development to proceed in phases; or (b) the grant of any kind of planning permission, where the grant is subject to conditions ... having that effect."

As application 26/01201/OUT is an outline application, it is understood that Regulation 3 therefore does not apply, the unit values for these ancient woodland parcels should be included within the metric (totalling 28.272 units and increasing the baseline value to 724.87 units) and the effect is that actual net change for the site would become 9.81%, failing therefore to meet the statutory objective.

5.3 Internal inconsistency in the assessed importance of barbastelle

Chapter 8 assesses the Annex II species, primarily barbastelle, as being of **national importance** at paragraph 8.4.16, and the Site as supporting commuting corridors of national importance at paragraph 8.16. Appendix 8.10 assesses the same species, at paragraph 3.1.2, as *“a species feature of regional importance”*. The geographic frame of reference determines the significance of the effect under the CIEEM guidelines that the assessment claims to follow, and the Environmental Statement should be internally consistent on the point.

5.4 Errors in the presented dataset

Table 5 of Appendix 8.10 states a grand total of 193,824 bat calls. The species totals in that same table sum to 437,234, which is also the sum of the twenty per-location figures presented at Figure 10, and is the figure consistent with the statement at paragraph 1.7.3 that common pipistrelle’s 316,009 calls represent 72.27% of all calls. Relatedly, Figure 10 is captioned as showing calls by location *“with common pipistrelle bat calls removed”*, but the values it presents are the totals including common pipistrelle, and are the same figures quoted as totals in the text at paragraph 1.7.5. These may be presentational errors, but they are errors in the primary results tables of the document on which the bat assessment rests, and they do not encourage confidence in the analysis built upon them.

5.5 Survey effort for activity transects

The night-time walkover survey comprised three nights in total across the 2025 season — 29 April, 7 August and 16 September — each of approximately two hours’ duration from around sunset (Table 3 of Appendix 8.10 records survey windows of 20:12–22:25, 20:33–22:40 and 19:16–21:19). There was no pre-dawn or full-night coverage, and no survey in May, June, July or October. For an EIA-scale application of 2,160 dwellings on a site of 184 hectares supporting seventeen bat species and multiple Annex II species, we do not consider three transect nights, weighted to the first two hours of darkness, to be commensurate with the scale of the proposal or with the expectations of Collins (2023), which the appendix cites as its methodological basis. An appropriate assessment of activity might consider the inclusion of thermal imaging cameras to enable more reliable evaluation of the movement of bats across the site and given the significance of the barbastelle bat populations present – the direction of travel by these bats to/from potential roost locations.

5.6 Deferral of the determinative evidence

The Environmental Statement concludes that residual effects on barbastelle will be neutral and not significant, while at the same time providing that the detailed design of road crossings on key bat commuting routes *“will be informed by the findings of additional bat activity surveys”* (Chapter 8, paragraph 8.14.15), that trees with PRF-M features will be subject to aerial inspection and, where necessary, emergence and re-entry survey before felling, and that a European Protected Species licence will be obtained *“where roost loss cannot be avoided”*. The assessment therefore reaches its conclusion on data that the applicant accepts have yet to be collected. That is not a matter that can properly be left to condition: the surveys in question are the ones that would establish whether the conclusion is correct.

5.7 Survey data the applicant has yet to provide

The Environmental Statement identifies survey work that remained outstanding at the point of submission. Chapter 8 records at paragraph 8.3.2 that further surveys for riparian mammals *“are scheduled to be updated in April and October 2026”*, and that, in relation to great crested newt, *“eDNA surveys are scheduled to be carried out between April to June 2026”*, with any ponds that were dry in 2025 to be re-checked. Paragraph 8.3.3 records that the ground level assessment of trees for bat roost potential was to

be progressed with a draft tree removal plan in 2026. Paragraph 8.3.6 then concludes that these limitations are “*typical of large-scale ecological assessments and do not materially affect the conclusions of the assessment*”.

None of that information has been provided. We have checked the Council’s planning register. Of the documents comprising this application, all but one were published on 17 July 2026, the remaining document on 21 July 2026. Nothing further has been submitted since. There is no addendum, no further information submission and no supplementary survey report. The only material added to the register since validation is third-party correspondence.

Invertebrates

The invertebrate evidence base is a scoping exercise presented as a baseline. Appendix 8.14 records a rapid assessment undertaken on two dates only — 7 August and 25 October 2025 — supplemented by survey work carried out in 2017. The species list appended to it covers a single parcel.

The appendix then sets its own threshold and records that the threshold is met. At paragraph 2.2.1 it states: “*Parcels 1-4 all pass the threshold for follow up baseline surveys.*” It proceeds to specify, parcel by parcel, the surveys required:

- Parcel 1 — three visits in spring, summer and autumn to sample aquatic and terrestrial assemblages, with subterranean and vane traps within the copses, sampling before grazing, and sampling of the field pond at the rear of the industrial estate;
- Parcel 2 — three half-day visits in spring, summer and autumn to assess nectar and pollinator resources, and a check for brown hairstreak potential in south-facing hedges;
- Parcel 3 — further aquatic and terrestrial sampling, nocturnal light-trapping, and a targeted survey for the pondweed hopper *Erotettix cyane*, a Section 41 priority species, of which the appendix records that the Site “*remains its only known site in VC12*”; and
- Parcel 5, west of Totters Lane — further aquatic and terrestrial sampling, investigation of the sedge beds in early spring when inundated, and nocturnal light-trapping.

None of that work has been carried out. At paragraph 2.3.2 the appendix repeats that “*further surveys are recommended to fully assess the importance of the woodland, muddy-drawdown zones and the fishing lakes for invertebrates and where targeted mitigation is required*”, and at paragraph 2.3.6 that “*further surveys will inform what species are present and the specific habitat requirements of any notable species. A mitigation strategy may be required if notable invertebrate assemblages are present.*” Notwithstanding all of that, paragraph 2.3.1 concludes that “*no significant impacts are predicted*”. The same appendix states that the baseline is incomplete, that a mitigation strategy may prove necessary, and that no significant effect will arise.

That conclusion is also difficult to reconcile with what two days of survey already produced. The appendix records the rove beetle *Carpelimus obesus*, a Notable species and new to vice-county 12, from the muddy drawdown zone — the very feature paragraph 2.3.2 identifies as requiring further survey. It records the Notable yellow loosestrife bee *Macropis europaea*, the Nationally Scarce *Lasius brunneus* and *Aquarius paludum*, and some twenty further species of local status. It records at paragraph 2.2.6 that the 2017 surveys confirmed the woodlands to be of **County importance for saproxylic assemblages**. Chapter 8 itself assesses invertebrates as a receptor of high sensitivity and construction effects as major adverse (significant at local level) at paragraph 8.7.38.

This is the same defect that affects the bat evidence, in a second taxon: a conclusion of no significant effect drawn from an admittedly incomplete baseline, with the determinative survey work deferred beyond the point of decision. Taken together with the outstanding eDNA and riparian mammal surveys and the deferred tree assessment, it is not an isolated gap but a pattern that indicates that the Environmental Statement does not contain the information reasonably required to assess the likely significant ecological effects of the development. This deficiency cannot be cured by condition, because the surveys in question are those that would establish whether the assessment's conclusions are correct.

6. Conclusion and requests

The Site supports a bat assemblage of seventeen species on the applicant's own data, including a nationally important barbastelle interest, and lies within the core sustenance zone of a barbastelle maternity colony confirmed by the applicant's referenced radio-tracking data from 2017. The radio tracking work caught and radio-tracked a Bechstein's bat on this Site to a tree roost, and located two of four tagged-bat roosts within the Site boundary. Against that baseline, the 2025 survey programme comprises acoustic activity survey and a restricted tree assessment, with no trapping and no radio-tracking. In our professional opinion:

- the presence and use of the Site by Bechstein's bat remains undetermined, and the species has been discounted from assessment on the basis of automated classifications that the appendix itself states cannot be relied upon;
- the significance of the effect on barbastelle is unsubstantiated, because no current roost has been located; the core sustenance zone of the colony or colonies using the Site cannot therefore be defined, nor the proportion of it that would be lost;
- the severance of Brenda Parker Way, the single most important barbastelle feature recorded on the Site, is not acknowledged in the appendix that assesses it, and the roost resource to be felled at the crossings — including a veteran oak with two PRF-M features — is unassessed; and
- the SANG has not been demonstrated to be capable of performing its mitigation function, Natural England having already found the design non-compliant with its 2021 guidelines.

Winchfield and Hook Parish Councils therefore **object** to the application as submitted, and asks that the Council:

- require the applicant, under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, to provide further information comprising: advanced bat survey work (trapping under licence with acoustic lure, and radio-tracking) sufficient to determine the presence and roosting locations of barbastelle and Bechstein's bat and to define the relevant core sustenance zones; manual verification of all *Myotis* and *Plecotus* determinations, with the raw acoustic dataset and per-detector-night normalisation; aerial inspection of all PRF-M trees affected directly or indirectly; a corrected irreplaceable habitats register including veteran trees; and the SANG noise assessment described at section 4 above;
- re-consult Natural England and Hampshire and Isle of Wight Wildlife Trust on that further information; and
- in the absence of that information, refuse planning permission, on each of the three distinct grounds set out below.

The three grounds are separate, and rest on separate legal tests:

- **European protected species.** The Council cannot be satisfied as to the effects of the proposal on barbastelle and Bechstein's bat, both European protected species listed in Schedule 2 to the Conservation of Habitats and Species Regulations 2017. It is therefore unable to determine whether the development would result in an offence under those Regulations, or whether the derogation tests governing the grant of a European Protected Species licence are capable of being met — matters to which it is obliged to have regard before granting permission. This ground engages Chapter 19 of the National Planning Policy Framework (August 2026) and Hart Local Plan Policy NBE4.
- **Irreplaceable habitat.** The proposal would result in the loss of irreplaceable habitat, in the form of at least one veteran tree identified as such by the applicant's own ecologists and scheduled for removal, without wholly exceptional reasons being advanced and without any suitable compensation strategy. This ground engages Policy N6, paragraph 2, of the National Planning Policy Framework (August 2026).
- **Thames Basin Heaths Special Protection Area.** The Council cannot ascertain, for the purposes of Regulation 63 of the Conservation of Habitats and Species Regulations 2017, that the development would not adversely affect the integrity of the Special Protection Area, whose qualifying features are nightjar, woodlark and Dartford warbler. The proposal lies within the 5 km zone of influence, the effect in question is recreational disturbance, and the SANG on which the applicant's conclusion depends has been found by Natural England not to accord with its 2021 guidelines. This ground engages Hart Local Plan Policy NBE3 and Saved Policy NRM6.

We would be pleased to discuss any of the above with you or with the applicant's ecologists, and ask to be kept informed of the progress of the application.

Yours sincerely

Paul Whitby BSc (Hons) MCIEEM CEcol
 Managing Director and Principal Ecologist
 The Ecology Co-op
 Natural England bat licences BER0290 and BMCL RC227

Acting on behalf of Winchfield and Hook Parish Councils

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