

Ecology response 25 10 23 for F/23/96256 Land adjacent to Boorley Park Primary School, Botley, SO32 2SH

Erect a single storey children's nursery with off road car parking (revised scheme)

Rebecca Altman

25/10/23

I have reviewed the Preliminary Ecological Appraisal report by KJF Consultancy (dated 2/10/23 and which lists LPA references F/22/94241 and F/22/94242 but not has not been updated to include this application).

The Phase 1 habitat map in Appendix 1 shows that the site is currently assessed to be ephemeral/short perennial dominated by rough grassland (visible in the site photos) a large patch of scrub roughly in the centre of the site and species poor hedges along the southern and western boundaries. Section 2.1.1 mentions the presence of blackthorn, hawthorn, and oak saplings, but these are not shown on the phase 1 habitat map.

Section 6.2 states that biodiversity net gain can be achieved through the recommended enhancements. These include 2 bat access bricks (which should be self-contained bat boxes, not access into the loft space), generalised information about non-snagging roofing membranes which is not relevant to this new build where bats will not be accessing loft spaces, 2 bee bricks, 1 swift nest box and 2 hedgehog nest boxes.

As mentioned in the *Validation Statement for LPA Registration* at the beginning of the report, part of my ecology response to the previous applications was that ***the loss of brambles and grassland should be quantified***. This means that the existing extent of the grassland and bramble should be measured and compared with the amount of replacement habitat proposed. I don't see any information on how the enhancements recommended above would provide any measurable/quantifiable biodiversity **net gain** over the loss of most of the grassland and scrub covering the site.

It has still not been demonstrated that biodiversity net gain (rather than net loss) can be achieved on this site by removing most of the vegetation on site as proposed. Biodiversity net loss is against both national and local policies.

The landscape plan by JPS (June 2023) shows that roughly 75% of this site is proposed to be developed, between the building, car park, paths, play areas and paving. Only 25% would remain as vegetated land. The hedgerow along the western boundary (shown in the phase 1 habitat map) is proposed to be removed completely. The landscape plan states that 426 m² of wildflower meadow has been added and 130 m² of native hedging has been added, however hedgerows are linear features so are not considered as replacement for non-linear habitat. The Merged Plans document (rev F) shows an approach view where almost no vegetation is visible. No landscaping information has been provided for the area to the south of the site, within the blue line boundary, but this area has potential to provide additional biodiversity uplift for the site.

The small sites metric (SSM) can be used to calculate biodiversity net gain on non-residential sites where the floor space is less than 1,000 m² and where the site area is less than 1 hectare. The PDAS states that the area of this site is approximately 0.22 ha. The developed area of the site cannot be included in the biodiversity net gain calculation unless green roofs are included in the design.

If the biodiversity net gain issue were to be resolved, the landscape plan would need to show greater diversity in planting. The current plan shows only 5 apple trees, whereas previous plans (the July 2022 site plan is included in the merged plans document) showed a range of tree species and various shrubs scattered through the perimeter grassland areas. Three of the 7 proposed shrub species are hebes, and only one perennial flowering plant is listed (*Salvia nemorosa* 'Caradonna'). A variety of different species is required to provide a longer flowering period where food is available for pollinators.

Mitigation and precautionary working methods are recommended, to include two-way badger gates and hedgehog holes in boundary fencing, protection of retained hedgerows, and if clearance is necessary during their active periods, precautionary clearance methods for hedgehogs, nesting birds and slow worms would be required. These can be conditioned in a CEMP.

Other issues raised by the Preliminary Ecological Appraisal report are listed below.

Section 2.1.5 states that no evidence of dormice was found, but no further information was provided on how this information was collected. Dormice can be very elusive and are mostly active at night. There is no evidence that any dormouse tubes or footprint tunnels were used in the hedgerows or that standard survey methodology was followed.

Section 2.1.2 states that *the grassland is a habitat for Slow worms (Anguis fragilis) that will forage within the site and pass through it*, however there is no replacement proposed for this on-site habitat which would be removed.

Section 2.1.4 states that the site was inspected for badger setts, but there is no information about where the badgers might be coming from, or whether the areas surrounding the site within a 30 m radius have been checked for evidence of badgers which is standard practice. If badgers are able to forage on site using two-way badger gates as recommended, would they have any foraging area left to use after the proposed building and paving has been completed? It would not be safe for young children to play in a nature educational area which is also used by badgers.

Appendix 2 is a reptile survey report. There is a preliminary report dated 2/7/23 which shows the use of non-standard refugia which look like lightweight corrugated plastic rather than the bitumen roofing felt, carpet squares, corrugated onduline roofing material or corrugated metal which are normally used in reptile surveys. I have never seen this material used in reptile surveys and don't think it has the same thermal properties as the standard materials. The report shows that the reptile refugia used needed to be pegged down, which means they are quite light.

Seven site visits are listed between July and September however this report still contains section 1.1.5 which contains inaccurate information about reptile surveys: *However, given when the LPA requested a reptile survey (26.04.23); it was not possible to carry out visits 1 to 5. This year, it is only possible to carry out visits 6 and 7. I will make visit 6 to inspect the refugia for reptiles, during the morning of 03.07.23.*

I am still not confident that the ecological work done on site has been done using standard methodologies or best practice.

Although these issues are of concern, the issue of biodiversity net loss is the bigger problem for this proposal.

Lisa Malter

Ecologist