

Ecology response amended for F/23/96224 32A QUEENS VIEW, NETLEY ABBEY,
SOUTHAMPTON, SO31 5EA

Construction of part 3-storey, part 2-storey building to provide 18 flats and a ground floor retail unit, following demolition of existing building, to include vehicle access, parking, landscaping and footpath access to recreation ground.

Rebecca Altman

7/12/2023

A PEA report labelled updated was added to the system on 1/12/23 but it is still labelled as the September 2023 version which I reviewed on 26 October and has not addressed the issues raised in the previous ecology response.

An updated Phase II Bat Surveys and Mitigation Strategy report (November 2023) contains a precautionary working method under Supervision in section 5.2 (section 5.1.2. states that it will be in 5.2.2 and section 5.2 lists it in 5.2.1). A bat box will be installed on a tree just outside the red line boundary to receive any bats that might be found in a destructive search. The precautionary working method must be clarified to state that the licensed bat worker will be present to supervise the removal of tiles in any area with bat roost potential and to specify that these will include these areas identified in the PEA report:

- the hanging tiles with gaps identified on the southern and southwestern elevations of numbers 30 and 30a (fig 13 and 15),
- slipped hanging tiles on the front elevation of number 32 (fig 18) and
- on the rear elevation a hole in a hanging tile,
- a gap between the window PVC and the tiles (fig 19) and
- a gap in the mortar just below the roof.

A Biodiversity Enhancement and Mitigation Plan has been submitted which is dated 13 November 2023 which contains the same precautionary working method in section 4.1.1 and recommends four bat bricks to be installed in the new building. Three swift bricks are now recommended as requested, however the positions of the bat bricks and swift bricks do not conform with recommendations by the Bat Conservation Trust and Swift Conservation.

The enhancements plan (on p. 27) shows two swift bricks and two bat bricks on the northeastern elevation and one swift brick and one bat brick on the southwestern elevation. The Bat Conservation Trust recommends installing a **bat brick/box** ...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**... (<https://www.swiftconservation.org/Nestboxes%26Attraction.htm>)

It is not clear why this guidance has not been followed.

Hedgehog gaps in the fencing have been added, and appear to be in appropriate locations although a second gap (2 gaps per fence line as specified in 4.4.1) in the eastern fence further to the south would be welcomed if there is not already a natural gap in this location.

Invasive species have been addressed in section 6.7.3.1 on page 45 of the PEA.

The updated Drainage Strategy (Rev B, November 2023) has used the simple index approach from table 26.3 and 26.4 of the Ciria SuDS manual to demonstrate that there is sufficient treatment provided by permeable paving for the residential parking areas. The roof drainage is divided between the two soakaways.

SuDS maintenance information has been provided for the soakaway and permeable block paving. Exceedance flow rates have been addressed in section 5.0 and are shown on a plan in Appendix 5. The tree pits on the western boundary could be enhanced to absorb additional exceedance flow so the risk of flooding on Castle Road is reduced in exceedance conditions.

Lisa Malter

Ecologist

26/10/2023

There are records of bats, nesting swifts, stag beetles and hedgehogs very close to this site. It is in a white great crested newt impact risk zone so great crested newts are not expected to be present on site. The Preliminary Ecological Appraisal Report by Ecosupport (revised September 2023) states that there is low potential for roosting bats, low potential for common reptile species and moderate potential for breeding and nesting birds.

I raise a holding objection on this application on the basis of insufficient bat survey effort.

There are quite a few potential bat roost features. These include gaps in hanging tiles on the SW elevation, gaps in bitumen felt roof linings in both lofts (30 and 32) and a gap between at least one window frame and hanging tiles. Although these features would normally result in a building being assessed as having moderate bat roost suitability (requiring 2 Phase 2 bat surveys), the assessment has been downgraded to low (requiring 1 Phase 2 bat survey) due to the urbanised setting. I don't agree, as there are records of bats 150 m to the west and 130 m to the east of this site in a similar setting, and the site is adjacent to an undeveloped recreation ground. The report also states that there are ornamental plantings, scrub and hedgerows on site, which bats could use for foraging.

The Phase II Bat Survey(s) report shows that only one emergence survey was conducted in August 2022. No bats emerged from the building, however there were five species of bats recorded foraging and commuting in the area during the survey.

Due to the presence of more than a few potential bat roost features, commuting and foraging bats, vegetation suitable for foraging nearby and at least 2 previous records of bats

within 150m I think there was insufficient survey effort on this building. It should have been classified as having moderate or moderate to low but not low bat roost potential.

There are two options to overcome this objection:

1. A second bat activity survey would be required before determination. This can only be done during the active bat season (May through September).
2. A non-licensed precautionary working method can be conditioned. This would involve first having a bat box erected in a suitable location on site. Then the hanging tiles and any other potential bat roost features would be hand-stripped under the supervision of a bat-licensed ecologist in suitable weather and temperature conditions. If any bats are found they could be safely relocated to the bat box which will remain undisturbed during construction and can remain on site as a permanent feature after construction has been completed. The non-licensed precautionary working method would be my recommendation and would avoid delays in determining the application.

The PEA report section 6.6.1 states that one bat brick is recommended as biodiversity enhancement *for the new extension*. This is not an extension, it is a new building and more than one bat brick must be included. The Phase II bat survey report, section 5.2.3 recommends two bat bricks. If any bats are found during the supervised tile strip additional compensation for loss of roosts will be required.

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>).

Exterior lighting must follow the latest updated lighting guidance note (GN08/23). This is available at [Guidance Note 8 Bats and Artificial Lighting | Institution of Lighting Professionals \(theilp.org.uk\)](https://www.theilp.org.uk) and supersedes the 2018 guidance listed in 5.2.1. The bat boxes should not be located on the same side of the building as the entrance to the proposed retail unit as this is more likely to be illuminated at night and have higher levels of noise and disturbance.

At least one swift brick has been recommended. Two or more should be included to meet the guidance in BS 42021:2022 for integral nest boxes which recommends two to four on a medium to large house and from four to ten on a small block of flats.

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

Bamboo is not mentioned in the list of invasive species in section 4.1.3.1 Management, but it was mentioned in section 4.2.4 Hedgerow and appears in the photo in Figure 11. It is

invasive and must not be allowed to spread either on or off the site. A precautionary working method will be required to avoid the spread of invasive species such as bamboo on and off site.

Neither the PEA nor the Phase II Bat Survey reports mention whether the trees and hedges proposed to be removed contained any potential bat roost features or provide suitable habitat for nesting birds. The Planting Plan by Deacon Design (September 2023) shows that all original vegetation would be removed from the site. The Arboricultural report lists 6 trees (eucalyptus, 2 sycamores, crab apple, hawthorn, Photinia 'Red Robin') and 2 hedges (Laurel and Cypress). The sycamores are located along the eastern boundary and are recommended to be retained and protected, but this is not shown on the landscaping plan.

The Construction Site Management Plan by Paul Basham Associates (September 2023) must be amended to include precautionary working methods to prevent disturbance or harm to nesting birds, reptiles, amphibians, hedgehogs or stag beetles which might be using the site and the adjacent recreation ground. It must also include information on wildlife sensitive lighting, pollution prevention arrangements and a construction phase surface water drainage strategy.

A biodiversity enhancement and management plan can be conditioned. It must show the locations of the proposed enhancements together with the proposed exterior lighting plan to ensure these enhancement features are located within sufficiently dark areas.

The PEA report recommends a wildflower/grass mixture to be used, but the lawn areas in the planting plan are shown as Strong Lawn Grass mixture (EG22) under the trees rather than a wildflower mix. The plant list on the planting plan lists *Luzula sylvatica* in two different densities under grasses, however this is greater wood rush, a good plant to include, but not actually a grass species.

Section 3.2 of the Landscape Management Plan by Deacon Design (September 2023) states that no existing trees will be retained on site. Once established native species hedgerow plants should be managed for the benefit of wildlife. To ensure a year-round supply of flowers, fruits and seeds, these should be pruned on a three-year rotation with the top and alternate sides pruned each year or 1/3 of the hedgerow pruned every year.

The Drainage Strategy by Arch Associates (Rev A, September 2023) states that infiltration is proposed through permeable paving and buried crate soakaways. Infiltration testing was conducted in May 2023 and confirmed that infiltration into the ground is a viable method of surface water drainage for this site, *within the granular beds of River Terrace deposits*. However the engineering appraisal section of the Soils Limited report section 4.1.1 states that soils described as made ground were encountered in the samples and exploratory pits, with rare plastic, odours of manure, chlorinated solvents and a faint soapy floral odour. Further investigation is required to determine whether contaminants exist which could contra-indicate the use of infiltration. The Phase 1 Desk Study and Reconnaissance by Leap

Environmental Ltd (January 2024) has identified sources of potential contamination but states (in 9.4.2) that there is a *relatively low likelihood of soluble contamination to be present on site* and *the overall risk to controlled waters is considered to be low*. Due to the presence of contaminants **the Environmental Health Team must be consulted to determine whether infiltration is an acceptable surface water drainage strategy for this site.**

The simple index approach has been used to demonstrate that the pollution hazard for surface water drainage from residential parking will be fully treated by permeable paving. Although the calculations were not shown for water from the roof, if considered appropriate by Environmental Health, the soakaways will be a sufficient form of treatment for this water. Water butts should also be installed to use surface water drainage from the roof for watering gardens. The management recommendations for the SuDS features were appropriate.

The drainage plan states that the site slopes gently down to the southwest. Exceedance flows described as flowing to the southern boundary and are proposed to be discharged to Castle Road. It is not clear whether this could cause flooding on the road in extreme weather conditions as there is no information about drainage from this road. There is a row of trees proposed for the southern corner of the site. The tree pits could be engineered for additional storage capacity to avoid exceedance flows on the road.

Lisa Malter

Ecologist