

Ecology response 24 1 24 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

23/1/24

I have reviewed the Small Sites Metric (January 2024) which was completed for this application. The Preliminary Ecological Appraisal report (2/10/23) assessed the site as *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.*

Baseline: The only existing area habitat listed in the metric is modified grassland (0.8 units, 2000 m² habitat lost) low distinctiveness, moderate condition. The large patch of bramble scrub roughly in the centre of the site, as described in the PEA, has not been included in the metric. This would be medium distinctiveness habitat, with the same broad habitat or a higher distinctiveness habitat required under the trading notes. Assigning the habitat type modified grassland to the entire site inside the hedgerow moves the distinctiveness of all of the area habitat to low, which is not what was originally described in the PEA.

The existing hedgerow is 97 m (0.388 units) of which 93 m is proposed to be retained, and 4 m lost. Additional hedgerow creation is proposed to address the loss of this habitat with a proposed net change of 126.97% in hedgerow units.

Post development: The metric proposed habitat is 1.5676 habitat units with a net change of 0.7676 habitat units (net % change 95.95%), which is still a small loss of area habitat.

According to the trading rules hedgerow creation can not be used to compensate for area habitat loss.

On tab 10 of the small sites metric for bramble scrub, condition enhancement rules state condition enhancement not possible, enhancement to any medium distinctiveness habitat in heathland or shrub habitat only.

Since the requirement for 10% biodiversity net gain is not a statutory requirement until 2nd April 2024, we don't need to require exact numbers at this point, but I don't think that the omission of bramble scrub from the baseline area habitat in the metric has answered my original questions.

Rather than belabouring this point, I sustain an objection to the proposal due to a small net loss of biodiversity. The objection could be overcome if further landscaping enhancements can be achieved. A green wall, green roof, green roofed shelter over part of the car park/

bike shelter/storage area, or greater diversity of planting with a longer flowering season could be incorporated into a detailed landscaping plan which can be conditioned.

Lisa Malter

Ecologist