

Ecology response to amended information 13 12 22 for F/22/93835 MOORLANDS FARM, BOTLEY ROAD, WEST END, SOUTHAMPTON, SO30 3HD

Demolition of all existing buildings and detailed planning approval for light industrial floorspace [Use Class E(g)(ii) & E(g)(iii)], warehouse floorspace [Use Class B8] and estate office (Use Class E(g)(i)).

Summer Sharpe

13/12/22

I have reviewed the Consultation Response Summary (December 2022) and the relevant amended documents:

Amended Ecological Impact Assessment by Ecosupport (December 2022)

BNG V3 spreadsheet by Ecosupport (December 2022)

Amended Landscape Mitigation and Enhancement plan by ACLA (December 2022)

Amended Sustainable Drainage Strategy Addendum No. 1 by Fernbrook Consulting Engineers (December 2022)

Amended proposed site plan parts 1 and 2

Amended proposed boundary treatments plan by ACLA (December 2022)

Amended DAS by Radley House Partnership (Rev D, December 2022)

Natural England response (October 2022)

Ecology

The EcIA by Ecosupport (December 2022) states that the farmhouse building (building 1) has confirmed common and soprano pipistrelle summer day roosts, there is low/moderate usage of the site by foraging and commuting bats, a confirmed medium population of grass snakes (found in 5 locations during 2021 surveys) and suitable habitat for breeding and nesting birds on site. The report states that the site has potential to be used by hedgehogs and badgers for commuting and foraging. It also states that *If the development does not take place within 18 months¹ of this report then the findings of this survey will no longer be considered valid and may require updating.* This would mean 18 months after the August 2022 walkover.

The EcIA has been updated to include demolition of all buildings on site. The biodiversity net gain assessment done on 14 April 2022 was mentioned in section 3.3.1 but if the biodiversity net gain calculation has been amended due to amended plans it has not been updated in this report. The report also mentions an area of lowland deciduous woodland had been felled and replaced with tall herbaceous vegetation between the November 2020 walkover and the August 2022 walkover (Section 4.2, Figure 9). The condition of the farmhouse (building 1) had deteriorated since the previous survey, however the bat roost locations were reported to be *still largely intact*. A swallow nest was identified within building 2 (pigsty) in November 2020).

Section 8.2.1.7 of the amended EcIA still refers to mitigation for a *newly renovated farmhouse building* instead of a replacement building, which is building C on the proposed site plan (Rev K, 5/12/22). It also refers to buildings F and G, when the latest site plan only shows buildings A, B

and C now. A bat license is required to demolish the farmhouse, which can only be applied for after planning permission is granted. As the farmhouse is deteriorating, bat roosts could be lost if this is not done soon. The bat mitigation will need to be updated to fit the latest plans, but I agree that the mitigation bat boxes should remain in situ for perpetuity. Replacement bat roosts must be provided in addition to the bat bricks proposed for enhancement. At least 4 bat roost locations were shown in figures 26, 27 and 28 in section 4.4.4.

Section 8.11.4 recommends an additional 17 bat bricks and 34 swift bricks to be built into the new buildings as biodiversity enhancement. This may need to be re-assessed against the updated site layout to determine whether there is enough space on the correct elevations for bat and swift bricks. Additional tree-mounted bat boxes can be used if there is not enough room for 17 bat bricks on unlit southern, south-eastern or south-western elevations, sheltered from strong winds and exposed to the sun for part of the day.

The reptile mitigation section has been updated, with the latest proposed site plan used for figure 34 in section 8.3. If planning permission is granted, the reptile receptor area must be enhanced with hibernacula and any additional habitat enhancement to be done in advance of the proposed reptile translocation (before March 2023). In the proposed development site bramble and grass sward height can be reduced to 10 cm before the nesting bird season starts at the beginning of March (or under ecological supervision if done during bird nesting season), capture and translocation on suitable days between March and September. This can be conditioned, but it must be a pre-commencement condition, ie. reptile mitigation and translocation and the ecologically supervised demolition of the farmhouse building (between March and October to avoid hibernation season and in suitable weather conditions) must occur before any other work is done on site.

Additional conditions recommended in the EclA:

An updated badger walkover will be required immediately prior to commencement of construction.

In order to avoid disturbance / harm to nesting birds or damage to their nests, all construction works (i.e. tree, shrub and scrub removal), and the removal of the outbuildings, will be undertaken outside of the bird nesting season (bird nesting season is typically between March – August, dependent on weather). If this is not possible, any potential nesting sites must be checked by a suitably qualified Ecologist. If an active nest is identified a 5m buffer will be established, within which no works will be able to take place until the Ecologist has confirmed the fledglings have left the area of impact.

In order to avoid any disturbance to bats (and other potential nocturnal wildlife) construction works should be limited to daylight hours and should not be undertaken 30 minutes prior to dusk through to dawn. All lighting should be sensitive to the use of the site by nocturnal wildlife, for example by including low-level downward-facing / hooded lights that are sensor-operated where possible.

During construction, any excavations on site should be covered nightly and/or include a suitable escape ramp for the protection of wildlife e.g. Hedgehogs (a suitable escape ramp can be created using wooden planks placed at a 45-degree angle or provision of a sloping end wall). Any temporarily exposed open pipe systems should be covered.

I am satisfied that a CEMP (also required by Natural England), and a detailed lighting proposals plan with modelled lux levels (demonstrating 1 lux or less on wildlife-sensitive areas) can be conditioned.

The wildlife sensitive lighting recommendations in the EcIA report (from Guidance Note 08/18 Bats and Artificial Lighting in the UK) are sound and can be implemented.

The CEMP must also include prevention measures for air and water pollution which might affect Moorgreen Meadows SSSI in addition to on-site habitats.

The native tree and shrub planting and neutral grassland planting enhancements in section 8.11.1 of the EcIA report can be conditioned in a BEMP and/or combined with the detailed soft landscaping plans. The log piles and hedgehog homes recommended in sections 8.11.5 and 8.11.6 can be included in the BEMP.

It is not clear whether the biodiversity net gain calculations in section 8.12 (Figure 39) are based on the older site plan or the most recent plan. This must be made clearer. Even though this is labelled V3 December 2022, the corresponding EcIA report still had some parts that had not been updated. The area of woodland that was removed before the 2020 update survey should be included in the baseline habitats, but it is not clear whether or not this has been done. A net gain of 0.24% or 0.03 habitat units is quite low although there is not yet a legal requirement for a set amount of biodiversity net gain.

The biodiversity net gain spreadsheet appears to include all the latest proposals including the grass roofs (substituted for the sedum roofs) and the species rich grass grid near the SuDS pond, however it still refers to buildings A-D in the assessor comments on tab A-2 Site Habitat Creation, urban section, proposed rain garden. There is an orange box at the top of this sheet that says *Area cross check failed (Baseline habitat lost does not match development footprint plus area of new habitat creation)*.

If the area to the east of and adjoining the SuDS pond is to be a reinforced grass grid with species rich planting, it *will provide a natural migration link to the nearby ecology area and stream* however it will also be used by vehicles. This will create a situation where animals such as reptiles and amphibians that might be using the pond will be vulnerable to being run over. The consultation response summary states that *vehicle movements around this area will be very low*, however for this to be safe for amphibians there must be some provision to control vehicle movements when amphibians such as frogs and toads might be emerging from the SuDS pond and crossing over this area. This would be seasonal and tends to occur mostly at night in spring (migration to a pond) and summer (emerging from a pond).

It would be much better if the traffic could be kept off this area and routed through the crossover to the south of the pond. The pond could be re-shaped and moved further north and west to be better connected with the ecology buffer zone.

If this is not changed then overflow parking must not be allowed in this area in spring and summer when amphibians are likely to be migrating.

Maintenance must be managed to allow this proposed species rich grass planting to flower and set seed. A biodiversity environmental maintenance plan (BEMP) can be conditioned.

The changes to the ecology buffer zone (path removal, thorny shrubs around the boundary) are satisfactory. If a new orchard is to be planted in this area, will this be accessible to visitors? if it will be accessible it should be separated from the rest of the ecology buffer zone by additional plantings. If not, will the fruit be picked, or all left for wildlife? Management of this area must also include management for reptile habitat and can be conditioned in the BEMP. The fruit trees will need management if they are to remain productive.

SuDS

The indicative surface water and foul drainage strategy in the Sustainable Drainage Strategy Addendum No. 1 is a considerable improvement. It shows 4 treatments in each sub-catchment, three of which are above ground forms of filtration, satisfying EBC policy DM6.

The swale proposed at the eastern edge will be surrounded by vegetation. No-dig techniques are specified in this area, to protect the RPAs of the nearby trees. However, this swale is specified as being 1.5 m deep with 1:2 side slopes. How can this be accomplished without digging?

A rain garden has been added to the northern elevation of building C. Given the positions of trees also in this area careful attention will need to be given to plants that can survive in this shaded area. It may be more effective to move this rain garden to the southern elevation where there would be a greater chance of sunlight shining on the plantings. The rain gardens on buildings A and B are also north facing but have more chance of sunlight as they are adjacent to parking areas and not directly shaded.

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