

K4 Keppel
Daedalus Park
Daedalus Drive
Lee on the Solent
PO13 9FX

13th March 2024

Dear Ms Malter,

RE: Ecology Comments for F/23/96629 Land at Fieldfare Road, adjacent to the roundabout with Winchester Road.

This letter serves to provide additional information in response to the ecology consultee comments from Eastleigh Borough Council dated 23rd January 2024. ²

Biodiversity Net Gain (BNG)

'Schedule 14 of the Environment Act allows planning authorities to recognise any habitat degradation since 30th January 2020 and to take the earlier habitat state as the baseline for the purposes of biodiversity net gain. In order to ascertain the habitats present and their condition on 30th January 2020, aerial imagery or data sets from that time could be used. 30th January 2020 is the relevant date as it was the day the Bill entered Parliament.'

Aerial photos on Google Earth show the whole site as a green field in December 2020, and the next available photos are March 2022 show the field habitat has been degraded with tire marks, bare soil, mounds of soil, building materials, storage containers, large concrete pipes, and parking. It has obviously been used as a site compound for other areas of the wider development.

Section 6.11.1 of the PEA lists the habitats on site as being 0.49 ha of other neutral grassland and 0.173 ha of artificial unvegetated unsealed surface from a survey done in September 2023. Biodiversity net gain must be determined from the December 2020 baseline, which would be roughly 0.663 ha of other neutral grassland.'

Baseline Habitats

Following the above comments, the baseline habitats considered within the BNG are to be adjusted to the habitats present on site in December 2020.

A Preliminary Ecological Appraisal (PEA) was previously conducted on the site in 2018 For Phase 2 reserved matters (planning application ref: RM/18/84466). This was also updated by Lyndsey Barratt BSc (Hons) PGCert MCIEEM in October 2021 immediately prior to development works starting in the area. At this time the habitats on site were deemed unsuitable for reptiles as they had recently ceased use as cow pasture, therefore in December 2020 the site supported early establishing grass species with a short sward and unsuitable structure for reptiles.

The previous ecological report for the site stated that improved pasture fields are present across the site with areas to the periphery supporting more diverse vegetation structure. A similar assemblage of species, as was previously noted, were recorded. This is considered likely due to continual management (Ecosupport, 2018). Additionally, species noted during the most recent walkover (2023), whilst being more diverse, were more likely a result of the recent disturbance to the area and not reflective of the long-term management of the field parcel, therefore, a classification of 'modified grassland' is considered more representative of the habitat on site.

Figure 1a. Historical aerial imagery of the site from December 2020 (Google Maps Pro).



Figure 1b. Photograph taken during the PEA conducted on site in 2018 (Ecosupport).



Based on the above, the site is considered to fall under the habitat category of **Modified Grassland (g4)** under the UK Habs Classification System as per the definition stated in the guidance (2023):

*“Species-poor vegetation (<9 species per m²) dominated by a few fast-growing grasses on fertile, neutral soils. It is frequently characterised by an abundance of Rye-grasses (*Lolium* spp.) and White Clover (*Trifolium repens*). Most broadleaved species present will be associated with high fertility.”*

In addition, the site is located within an active construction site and has been subject to significant degradation and damage due to heavy machinery and material storage. Damaged areas of the site will therefore not be considered within the baseline BNG calculations, and habitats assessed will be those on site prior to the degradation of the site.

Habitat Condition

As a condition assessment of the parcel in 2020 cannot be carried out, it will be assigned according to historic aerial imagery, site use and forb species noted within the RM PEA (Ecosupport, 2019).

As mentioned in the previous section, the site had recently ceased use as cattle pasture at the time of the initial PEA survey (2018) for the larger Boorley Green Development. Due to this, it is considered unlikely that the parcel would pass conditions **A** and **B**. It is expected that the site would pass conditions **C** to **G**. As a result, the habitat present on site in December 2020 is considered to be **Modified Grassland (g4)** of ‘**Poor**’ condition. Details are displayed below in **Table 1:**

Table 1. Condition Assessment table for the modified grassland on site (Biodiversity Metric 4.0 Condition Assessment Table, 2023).

Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	There are 6-8 vascular plant species per m ² present, including at least 2 forbs (this may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m ² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	N	Based on aerial imagery and historic use it is unlikely for the parcel to support 6-8 species per m2. Site recently had ceased use as a cow pasture which likely subject the area to heavy grazing and regular management.
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	N	Sward height likely to be similar
C	Some scattered scrub (including bramble <i>Rubus fruticosus</i> agg.) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Y	No scrub present on aerial imagery or during most recent PEA
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Y	Small amount of physical damage likely present from grazing but amount likely less than 5%. No damage visible on aerial imagery
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens) ² .	Y	No bare ground visible on aerial imagery
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Y	No bracken present on aerial imagery or during recent PEA
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA ⁴).	Y	No invasive species present during most recent PEA
Essential criterion achieved (Yes or No)			No
Number of criteria passed			5
Condition Assessment Result (out of 7 criteria)		Condition Assessment Score	Score Achieved x/✓
Passes 6 or 7 criteria including passing essential criterion A		Good (3)	
Passes 4 or 5 criteria including passing essential criterion A		Moderate (2)	
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)		Poor (1)	X

Taking all of the above into account, the new baseline habitat assessment for the site is displayed in **Table 2** below:

Table 2. The previous and current BNG baseline habitat assessments for the site (current based on habitats present in 2020).

Previous			Current (based on 2020 baseline)		
Habitat	Condition	Area (hectares)	Habitat	Condition	Area (hectares)
Grassland - Other Neutral Grassland (g3c)	Moderate	0.49	Modified Grassland (g4)	Poor	0.663
Urban – Artificial unvegetated, unsealed surface (u1c)	N/A - other	0.173			
Total		0.663	Total		0.663

Please see the updated report ‘Preliminary Ecological Appraisal, Land at Boorley Gardens, March 2024’ for detailed Biodiversity Net Gain condition assessments and results.

Reptile Surveys

“Mitigation for reptiles proposes translocation of any reptiles found on site, however a suitable receptor site has not been identified either on or off site. We cannot agree to any translocation without a receptor site being identified and agreed upon before determination.

During the PEA on 26th September 2023, the site was assessed to support high potential for reptiles due to the longer sward and tussocky structure. It should be considered that during the initial PEA for the wider development (planning ref: O/15/75953) the site was not considered suitable due to lack of suitable structure and management. A reptile capture was consequently not carried out on site, however the boundaries were fenced with reptile exclusion fencing for the capture that took place on the adjacent parcels in 2019. The fencing has remained in perpetuity and on the most recent visit to site on 26th September 2023 the fencing was intact (**Fig 2**).

Figure 2. The southern boundary of the site. Reptile fencing is visible along the bottom of the photo (Taken September, 2023).



Due to the construction of Fieldfare Avenue around the east, south and west boundaries of the site the habitats have been isolated from additional areas of suitable reptile habitat since 2021 (**Fig 3**). As a result, the site no longer supports connectivity, which has served as a barrier to movement preventing reptiles occupying the habitats on site once they became suitable. As the isolation of the habitats occurred prior to the habitats becoming suitable for reptiles, it is considered unlikely that reptiles are present on site. A reptile capture is therefore no longer considered necessary. It should also be considered that the site has been highly disturbed for a number of years since construction commenced in 2021.

Figure 3. Aerial image of the site with the location of the reptile fencing indicated by yellow dashed line and Fieldfare Avenue visible along the south (Google Maps, 2024).



Full details and methodology of the reptile capture for the larger Boorley Green development can be found within the report 'Boorley Green, Ecological Assessment (October, 2019) (for Phase 2 reserved matters application (RM/18/84466) (January, 2019).

Mature Trees on Site

“The site has been assessed as having moderate potential for foraging and commuting bats, with three mature oak trees which were only able to be surveyed for potential roost features at a distance. Other assessments included high potential for reptiles, moderate potential for foraging and commuting badgers, low potential for terrestrial great crested newts, and moderate potential along the northern boundary for breeding and nesting birds.”

The three mature oak trees along the northern boundary of the site are to be retained under current proposals (see **Appendix I** - Tree Protection Plan, ACD Environmental, 2023). Although the site was assessed to support moderate potential for breeding and nesting birds, a full suite of Breeding Bird Surveys (BBS) is not considered proportionate due to the lack of suitable habitat available to survey. In the case that the trees are to be impacted by proposals, appropriate further survey work will be undertaken.

Kind regards,

Lewis Lakudzala BSc (Hons), MRes

Project Ecologist

References

ACD Environmental (2023). *Tree Protection Plan - Fieldfare Avenue, Boorley Gardens, Hedge End.*

Ecosupport Ltd (2018). *Land to the North West of Boorley Green, Development Phase 1, Updating Ecological Surveys.*

Ecosupport Ltd (2019). *Land to the North West of Boorley Green, Ecology Report, Second Reserve Matters Application*

Ecosupport Ltd (2023). *Preliminary Ecological Appraisal, Land at Boorley Gardens.*

UK Hab Ltd (2023). *UK Habitat Classification System Version 2.0 (at <https://www.ukhab.org>).*