

Ecology response for F/24/97344 The Paddock, Shop Lane, Bursledon, SO19 0QS

Change of use to a Gypsy and Traveller pitch and construction of associated day room and hardstanding.

David Huckfield

12/8/24

I raise a holding objection to this application for the following reasons:

The Statutory Metric submitted with this application does not provide any post-development habitat information and is therefore contrary to the requirements of the Local Validation List.

The EBC Local Validation List (February 2024) explains that *The Biodiversity Net Gain Strategy is required to assess the changes of all habitats pre and post development. It must:*

- *Quantify the pre and post development biodiversity value of the site using the statutory Biodiversity metric or Small Sites Biodiversity Metric (whichever is appropriate) with an explanation of the condition scores as set out in the DEFRA guidance. Plans of the site pre and post development (and of any areas on which off-site mitigation or compensation is proposed) must be provided together with Excel copies of the completed relevant metrics to demonstrate how the metric conclusions were reached.*
- *Identify how at least 10% Biodiversity Net Gain can be achieved, ensuring that the proposed habitat is provided onsite in the first instance followed by either a combination of onsite and partial offsite or completely offsite.*
- *Demonstrate that the trading rules have been adhered to.*

I have reviewed the Biodiversity Net Gain Assessment report by David Archer Associates (July 2024). This report does not address the post development biodiversity value of the site.

The 0.6ha site is comprised of buildings, modified grassland, other neutral grassland, artificial unvegetated, unsealed surface, other broadleaved woodland, mixed scrub, built linear features, line of trees, and scattered trees. The baseline has been presented, but a proposal showing how 10% biodiversity net gain is proposed to be achieved post development must be included.

The mitigation hierarchy consists of four steps that must be followed:

1. Avoid: prevent impacts on ecologically valuable habitats due to development
2. Minimise: limit impacts as much as possible
3. Mitigate: address any remaining impacts on site, enhance on site habitats
And only after the first three have been addressed then consider
4. Offset: achieve net gain by enhancing off site habitats

The proposal would require the removal of other neutral grassland which contains scattered trees. It states that parcel A is in poor condition and parcel B is in moderate condition. The report states that it is possible to deliver on-site BNG if the development included fencing off the areas to achieve net gain, separating them from the curtilage of the mobile home site

and providing a habitat management and monitoring plan (HMMP). This would be preferable to obtaining off-site net gain.

The UK Habitat plan (Appendix 1) shows that there is already a large amount of artificial unvegetated unsealed surface. If the design is modified and the buildings located on unvegetated surface, the loss more valuable habitat such as other neutral grassland could be minimised.

The block plan as proposed by Araco Design Studio shows the mobile home and the day room each having their own paved access and surrounded by paving. If these two buildings share a single paved access and use the existing unvegetated surface this will reduce the amount of potential habitat loss. Swapping the position of the day room and mobile home and shortening the drive would consolidate and reduce the paved area. If the barn is going to be used as a garage, then including some of the parking area within the barn would also reduce the need for additional paved areas.

Increasing the hedgerow green infrastructure around the perimeter of the site would provide an uplift for hedgerow units. A biodiverse green roof on the day room would provide an area of habitat. Planting fruit trees as an orchard would provide another uplift.

The potential for protected species to be using this site has not been assessed. There are records of slow worms, bats, nesting birds (including swifts), hedgehogs and badgers in the vicinity. In addition to providing 10% biodiversity net gain the impacts of development on protected species must be considered and mitigated.

A surface water drainage strategy is also required. Soakaways are mentioned in section 6.42 of the planning statement, but a percolation test is required to demonstrate that soakaways would be suitable in this location.

Lisa Malter

Ecologist