

Ecology response 25 9 24 for F/24/98083 BURSLEDON CONGREGATIONAL CHURCH,
SCHOOL ROAD, BURSLEDON, SOUTHAMPTON, SO31 8BU

Proposed Change of Use of Existing Methodist Church Hall to 3 dwellings and construction
of Garage

Clare Martin

25/9/24

I have reviewed the email from Davog at Peach Ecology (22/9/24), the updated bat survey report (Issue 2, 22/9/24) and the amended site layout plan (rev D, September 2024). The extent of the area and linear habitats on site have now been clarified and the amendments to the site layout have improved the plan. The retention, enhancement and addition of hedgerow vegetation and retention of the yew stump are appropriate. The loss of hedgerow habitat would then be below the 5 m linear habitat threshold and the development would be exempt from providing 10% BNG. The addition of bird and bat boxes will provide some biodiversity enhancements in accord with Local Plan policy DM 11 and NPPF paragraph 180.

I accept that the existing hedgerows will need significant management due to years of neglect. Once they are in good condition, management must include retaining flowers, fruit and seeds for wildlife. This can be conditioned with the detailed landscaping plan. Box is not recommended due to the prevalence of box blight, but privet or other flowering shrubs recommended as box alternatives should be considered (www.rhs.org.uk/plants/types/shrubs/box-alternatives).

Due to the records of hedgehogs nearby, precautionary working method for hedgehogs and hedgehog holes (13 x 13 cm minimum) in the base boards of any closed board fencing will be required. These can be conditioned and shown on the detailed landscape plan.

The clearance of any vegetation which could provide habitat for nesting birds must be done either outside of bird nesting season (ie done between the beginning of September and the end of February) or only within 24 hours after a nesting bird check by a suitably qualified ecologist. Any active nests must be protected from disturbance by a 5 m buffer until after the young birds have fledged and left the nest.

Lisa Malter

Ecologist

5/9/24

The site area is 0.06 ha. The application is claiming the de minimus exemption from 10% biodiversity net gain with less than the threshold of on-site habitat. To support this exemption, a pre-development site plan with measured habitat shown on the plan is required. I used a rough measurement tool to measure the size of the building and the size of the plot excluding the parking area to the west of the building. The difference was approximately 260 m² which is more than ten times larger than the 25m² area and 5 m² for

linear habitats (such as hedgerows) allowed for the de minimus exemption. Unless the applicant has alternative measurements, this site is not exempt from the statutory requirement to provide 10% biodiversity net gain.

The site plan by adp (rev C, August 2021) shows that vegetation along the northern boundary is proposed to be removed, with car parking, ramped paths, decking and cycle stores to be added around the building. This would represent a net loss of biodiversity, which is contrary to Local Plan policy DM 11 and NPPF paragraph 180. I raise an objection to this application on the basis that it would represent a net loss of biodiversity on site.

If these issues can be overcome and the application is able to progress, a Biodiversity Net Gain Strategy will be required as described in section 8 on pages 15 and 16 of the Local List for Validation of Planning Applications (February 2024).

I have reviewed the Bat Survey Report by Peach Ecology (August 2024). This site has been subject to regular bat surveys and ecological update assessments from December 2018 through June 2024. Although there were bats foraging and commuting in the area, no bats emerged from this building on any of the surveys. Should this application be permitted, Please could you add the following informative to the decision notice:

In the unlikely event of any bats being found during demolition or construction, all work must stop immediately, and Natural England must be called. Additional information is available on the Bat Conservation Trust website at <https://www.bats.org.uk/advice/im-working-on-a-building-with-bats/ive-found-a-bat-during-works>

The report proposes at least 20 m of a new low hedge along the northern side of the site using privet or box to replace the bramble scrub. This is not shown on the site plan. The plan shows small discrete plantings interrupted by paths, bins and parking spaces which would not have the same ecological value as the existing tree with ivy and the continuous boundary vegetation along Spring Grove visible in the photo on Google Earth.

Lisa Malter

Ecologist