

Ecology response for F/24/98257 SWINLEY, PYLANDS LANE, BURSLEDON, SOUTHAMPTON, SO31 1BH

Erection of 1no. four bed two storey dwelling in rear garden with detached garage, amenity space, parking and shared access off Pylands Lane

Clare Martin

2/10/24

Ecology

I object to this application on the grounds of biodiversity net loss. The DAS by BPS Design Consultants (July 2024) states *The biodiversity on the site is very poor and as this will be a self build no further reports are required to demonstrate enhancement*. This is not accurate. Even though 10% biodiversity net gain is not required, there must be no net loss of biodiversity and at least some net gain is required in accord with Local Plan policy DM 11 and NPPF paragraph 180.

As stated in the local validation list: *If habitat is cleared before an application is submitted, the baseline habitat value of the site will be taken to be its biodiversity value immediately before the carrying on of the activities, as per Schedule 14 of the Environment Act 2021.*

The removal of all vegetation from the site and the addition of a longer driveway, garage, parking area and a large house filling up most of the plot would represent biodiversity net loss using the pre-clearance baseline seen on the aerial photos.

I have reviewed the Preliminary Ecological Appraisal (PEA) by Arbtech (July 2024) which was originally written and submitted for the previous application H/24/97888 (permitted on 19 September 2024). The applicant has applied for the self-build and custom build exemption from the 10% Biodiversity Net Gain requirement for this application on the basis that there is only one house, and the plot size is less than 0.5 ha. The plot size is listed as 0.11 ha on the application form and 0.13 ha in the PEA.

The PEA report states that the site was cleared to bare ground at the time of the survey and the habitats on site had been removed. Aerial photos of the site show that before this clearance it was well vegetated with mature trees, smaller trees, shrubs, grass and several outbuildings on site. The report states that the habitats on site before clearance would have been classified as other broadleaved woodland, line of trees, vegetated garden with lawn and non-native and ornamental hedgerow. Parts of the hedgerow were still present at the time of the survey, however many of the herbaceous species at the base were covered by a mound of soil from the site clearance. The tree line to the west of the site is/was connected to higher value habitats and would have provided habitat for foraging and commuting bats. Removal of these trees and the surrounding scrub vegetation destroys this habitat.

This site is in an amber impact risk zone for great crested newts, with one pond approximately 210 m to the west, and another pond approximately 260 m to the southwest. There are records of bats in the existing dwelling (which would be affected by the previous

application H/24/97888) and other records very close to this site, and records of common reptiles in the wider area.

The PEA did not consider the potential for great crested newts or reptiles to be using this site, however if they had been on site they would have been affected by these clearance activities.

The recommended habitat enhancements in the PEA were for the larger garden area in the previous application and were not written for this application. For example, the foreseen impacts section states *the proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats*, assuming retention of the treeline on the western boundary. It also states *there will be no impacts to B2* which was true for the previous application, but which is proposed to be removed to accommodate this proposal.

The tree survey by Hayden's (5/8/24) was also done after most of the site was cleared to bare earth as shown by the two photos on the plan. There was some vegetation remaining along the western boundary at the time of the tree survey, shown in red on the plan. The PEA report states that the *hedgerows and trees on site* (remaining on site at that time) *provide opportunities for nesting, foraging, and breeding birds*. This habitat is proposed to be removed according to the tree survey (as G001), but not according to the proposed block plan which shows retained trees in this area. The red line boundary in the Tree Survey Plan appears to exclude some of the existing trees on site and does not line up with the site boundary. Is this an error or has it been done intentionally, and if so, to what purpose?

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Should this application be considered for approval, a biodiversity enhancement and landscape plan will be required before determination. This must demonstrate how some biodiversity net gain could be achieved on site with the locations and specifications of proposed biodiversity enhancements.

Surface Water Drainage

The Percolation Test Results by Mr Duddridge of Brockbuild Ltd (September 2024) demonstrate that the soil will drain sufficiently well for soakaways to be used. The DAS by BPS Design Consultants (July 2024) states that the driveways would be permeable block paving. Any soakaways must be located at least 5 m from any built structure and 2.5 m from a boundary. Surface water drainage features such as soakaways and pipes must be shown on a plan.

Lisa Malter

Ecologist