

Ecology response 10/10/24 for F/23/96629 Land at Fieldfare Road, adjacent to the roundabout with Winchester Road.

Erection of 70-bed C2 Care Home with new vehicular access to Fieldfare Road (White Stork Road)

Please could you comment on the amended PEA and nitrates budget, which includes information on BNG. In commenting please could you confirm which issues, when looking at the application as a whole, have been satisfactorily addressed and which issues still need resolving.

Liz Harrison

10/10/24

Ecology and Biodiversity Net Gain

I have reviewed the Preliminary Ecological Appraisal (PEA) by Ecosupport (dated 13 March 2024 but rev 8.0), the Boorley Green Ecology Addendum March 2024, and my previous ecology responses from 23/1/24 and 16/7/24.

We have already established that due to the application date (19/12/23) being prior to the date where 10% biodiversity net gain is required (12/2/24) this application does not need to provide 10% biodiversity net gain but must provide some biodiversity net gain in line with local plan and NPPF requirements.

In Section 8.0 the PEA report states that *The habitats assessed within the baseline BNG calculations are those that were present on site in December 2020 prior to construction*, however aerial photos on Google Earth show the whole site as a green field in December 2020. 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 having been used as a site compound for other areas of the wider development.

In Section 7.1 of the PEA it states that the habitats on site were modified grassland g4 (0.663 ha) and urban tree (0.122 ha).

In Section 7.2 Condition Assessments it states that *Due to damage to the site as a result of construction activities that commenced in 2021 the condition assessments below are based on the habitat that were present on site in December 2020.*

At the end of the report (Appendix I) the pre-development UK Habs map ostensibly used for the biodiversity net gain calculations shows a large area of artificial unvegetated unsealed surface with the secondary codes 81 ruderal/ephemeral and 510 bare ground. This map is likely to have been produced after the start of construction activities in 2021, not before.

In the Boorley Green Ecology Addendum March 2024 the correct December 2020 historical aerial imagery and Table 2 states that the current baseline habitat assessment based on this imagery would be 0.663 ha of modified grassland g4 in poor condition. The trees, which will be retained, seem to have been left out.

In the PEA Section 3.4 Biodiversity Net Gain states that using the Defra metric 4.0 the site would achieve a net gain of 15.48% or +.45 habitat units with all trading rules satisfied. The use of metric 4.0 was acceptable since the application date was prior to the requirement for the statutory metric. The actual metric in excel format has not been provided so that we can check that the correct baseline information has been used.

It is not clear whether the metric used reflects the baseline of modified grassland g4 (0.663 ha) and urban tree (0.122 ha), modified grassland g4 (0.663 ha) without any trees, or other neutral grassland g3 (0.49 ha) and artificial unsealed surface u1c (0.173 ha).

I expect that these inconsistencies have developed from cutting and pasting and amending an older report (March 2024) without sufficient editing.

In summary, what we need now is a new report, dated October 2024 which provides **only** the following information:

- A UK Hab map showing a December 2020 baseline of 0.663 ha of modified grassland g4 in poor condition and 0.122 ha of urban trees
- A UK Hab map showing the proposed post development habitats based on the proposed site plan by ADG rev Y dated 20/09/24
- A new biodiversity net gain calculation with the correct baseline and using the latest statutory metric so that we check it using Mycelia
- A proposal for any additional biodiversity enhancements and their locations on the site or on the building, including built in bat boxes, built in swift nest boxes, insect bricks, proposed new trees, flowering plants to attract pollinators, wildflower grassland, hedgerow planting. Bat boxes must be shown to be located away from exterior lighting and light spill from windows.

Once this report has been provided I will be able to list the issues that have been satisfactorily addressed.

Surface water drainage

There is no indication of any permeable paving on site or any form of filtration of surface water before discharge to surface water sewer pipes located off site as part of the wider Boorley Gardens Drainage Strategy. Exceedance flow arrows show water would move away from the building across the car park to the roadway.

Rain garden planting/planters must be considered. They would provide more opportunities for planting for pollinators, visual interest and filter rainwater before discharge.

Lisa Malter

Ecologist