Ecology response updated on 12 11 24 for F/24/97943 ROPLEY, BOTLEY ROAD, WEST END, SOUTHAMPTON, SO30 3HA

Construction of 2No. three-bedroom detached dwellings to rear with ancillary parking, amenity space, and shared access from Botley Road

Gary Osmond

12/11/24

I have reviewed the Statutory Metric now submitted for this application.

The Mycelia screening software shows that there are 5 metric errors, and this metric has failed at the validation stage. The Mycelia validation report is available on Salesforce.

An amended Proposed Site Layout with Landscaping (PL07) has been uploaded on 11 11 2024 however it is still dated July 2023, so it is not clear when it was amended. It has 23 replacement trees compared to the Proposed Site Plan with Photo Underlay (PL02 July 2023, Rev A) which has 29 replacement trees. More of the trees appear to be retained along the western and southern boundaries in this amended plan. The Biodiversity Net Gain report states that 15 urban trees will be planted in section 7.7. If additional trees or hedgerows are planned for the site, they should be included in a revised metric and the report should be updated. All documents submitted should contain the author's name, the revision date and the version so that it is clear which is the latest document.

A Biodiversity Gain Plan is required to be submitted and approved by the LPA before the start of works to ensure that 10% biodiversity net gain is achievable and able to be secured for 30 years. A Habitat Management and Monitoring Plan will be required for the on-site habitat. Proof of purchase of the off-site units will be required after planning permission has been granted, but before the start of works. This must include the reference number from the biodiversity gain sites register of the site where the units are being provided.

Lisa Malter

Ecologist

6/11/24

I have reviewed the following documents:

- Newt Statement (no name, no date, but uploaded to Salesforce on 21/10/24)
- Amended proposed site layout plan by BPS Design Consultants Ltd (labelled Rev A, July 2023 but uploaded on 21/10/24 so may be more recent)
- Biodiversity Net Gain Report by LC Ecological Services (October 2024)
- Preliminary Ecological Appraisal and Preliminary Roost Assessment by Arbtech (no report date but surveys in February 2024 and report submitted 17/9/24)
- Bat Emergence and Re-Entry Surveys by Arbtech (Issue 1.0, July 2024)

An Excel copy of the Statutory Metric has not been submitted as required by Local List Item 8. This draft response is written to progress the application but will not be finalised until the Excel Spreadsheet based on the latest updated site plan can be reviewed.

For the purposes of biodiversity net gain, clarification is required on whether this site is considered as one large site with landscaped areas held in common or will be divided into three private properties where the gardens could be modified by the property owners.

Great Crested Newts

As stated in the previous ecology response (3/9/24): *An ornamental pond on site was assessed with the rapid risk assessment tool as amber: offence likely. This means there is suitable habitat on site, so if the pond needs to be moved or altered an eDNA survey for great crested newts will be required. This can only be done between mid-April and June.* ***Since great crested newts only spend part of their life cycle in ponds, the terrestrial habitat around the pond must also be identified and protected if great crested newts are present***.

The presence of protected species is a material consideration and must be established before determination. The eDNA survey cannot be conditioned.

The Newt Statement has evaluated the options available to the developer: eDNA testing, District Level Licensing or a GCN mitigation license and requests that an eDNA survey be conditioned or a District Level License put into place prior to commencement.

As previously stated, the eDNA testing season will not start again until mid-April and ends in June. If the application is permitted with eDNA testing conditioned and great crested newts are not present, then the development could proceed.

The reason that we do not condition protected species surveys is that if great crested newts are found to be present in the pond it is not likely that the development plans would be changed significantly at that stage to accommodate them with suitable terrestrial and aquatic habitat in this proposed very small domestic garden. Although a pond is shown on the plan in the garden of the existing house, this site as proposed would not provide appropriate habitat for great crested newts either during construction or occupation.

The reason that the District Level Licensing scheme is available is to provide off site mitigation and to allow developers to comply with the legal duty to protect great crested newts without having to wait until the start of the eDNA testing season or the great crested newt survey season. Further information can be found at https:// natursapce.com/district-licensing/.

Reptiles

As stated in the previous ecology response (3/9/24): *Suitable reptile habitat has been found on site with a report of slow worms on site previously. Reptile surveys will be required, these can be done during the active reptile season in the spring and the autumn* (April, May and September). ***If reptiles are present on site, this must also be established before determination and specific mitigation for reptiles will be required.***

Even if the District Level Licensing Scheme is used for great crested newts, the development cannot proceed until the results of the reptile surveys have been received and suitable mitigation has been approved by the LPA.

Bats

The existing house and garage had been classified as having moderate value for roosting bats and two dusk emergence surveys were conducted according to best practice guidelines. No bats were seen emerging from the buildings during the surveys.

The precautionary working method for bats recommended in the report is appropriate and must be implemented. Any roof tiles must be removed carefully by hand, by workers who have been given an orientation on what to do if bats or signs of bats is found.

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 low impact lighting strategy described in the report shall be implemented.

A built-in bat box/brick is recommended as an enhancement for bats as these do not need maintenance and cannot fall off. At least one bat box should be built into each of the dwellings, this is also mentioned in the amended proposed site layout plan.

The Bat Conservation Trust recommends installing a bat brick/box at least 4 m above the ground, away from artificial light sources, sheltered from strong winds and exposed to the sun for part of the day, facing south, south-east or south-west. (https://www.bats.org.uk › our-work › putting-up-your-box)

10% Biodiversity Net Gain

The Biodiversity Net Gain Report confirms that the development will result in a net loss of 44.67% of habitat area (0.31 area units) and a net gain of 2.47% of hedgerow (0.00001 linear units). In section 9.2 it states: *The minimum target of 10% has not been achieved, therefore, an off-site area will be required, or third-party habitat credits will need to be purchased to ensure the development reaches the Biodiversity Net Gain requirements. The site requires 0.75 habitat units and 0.13 linear units to achieve a 10% net gain* ***on site.*** This should be amended to read **with a combination of on- and off-site habitat units.**

The report also recommends the following to reduce overall net habitat loss:

Retention of existing trees

Adding small standard trees (native stock, native species)

Planting a native species hedgerow along the eastern site boundary

The Amended Proposed Site Layout plan (rev A, no date) includes a native hedge mix to be planted along the western, southern and eastern boundaries of the southernmost garden, additional planting along the acoustic fence on the western site boundary, retention of

existing conifers along the western site boundary and a native hedge mix to be planted along the northern and western boundaries of the northernmost garden. Replacement tree planting has been proposed in the gardens and along the western site boundary.

This plan lists hedgehog holes in the closed board fencing, and swift and bat boxes to be provided on all three dwellings, and more native planting on the acoustic wall and within amenity areas.

Since the Statutory Metric Excel spreadsheet has not been submitted with this application, and the Amended Site Layout is not dated, it is not possible to determine whether the Biodiversity Net Gain Report was written before or after the site layout was amended.

It is also not clear from either the Amended Site Layout or the Biodiversity Net Gain Report whether the hedgerows and trees would be on common land or within private gardens.

Government guidance on Biodiversity Net Gain states that habitat within private gardens does make a *positive contribution to biodiversity but appropriate planting and ongoing management cannot be secured in the long term* in a private garden, so habitats within private gardens score a low value in the metric.

Surface Water Drainage

The percolation test results have been submitted and confirm that infiltration is a suitable strategy for this site. A surface water drainage plan which includes permeable paving, and a surface water drainage maintenance schedule can be conditioned.

Lisa Malter

Ecologist