

Ecology response 13 11 24 for F/24/96981 ST JOHN THE EVANGELIST CHURCH, ST JOHNS ROAD, HEDGE END, SOUTHAMPTON, SO30 4AF

To level the land with infill and erect an 8m x 12m stretched polycotton canvas canopy.

Gary Osmond

13/11/24

A Statutory Biodiversity Metric, 2 maps, 2 condition assessments and headline results from the metric have now been added to this application. A Biodiversity Gain Strategy document as requested in the previous ecology response has not been provided.

The information provided states that the parcel of grassland is classified as other neutral grassland in good condition. It contains the invasive species three cornered garlic. There is a pond in poor condition and the enhancements recommended are to repair the leak, remove non-native species, reduce shading and improve diversity of aquatic plant species. Fish should be kept out of this pond. There is also a single urban tree.

Visual comparison of the existing and proposed on site habitat maps show that there would be an increase in the area of artificial unvegetated unsealed surface and a decrease in other neutral grassland habitat. This is confirmed by the On-site habitat creation tab which shows creation of 0.0095 ha of artificial unvegetated unsealed surface. The pond and the tree are retained. Both the pond and the grassland are of medium distinctiveness. The On-site habitat enhancement tab proposed enhancement of the grassland and the pond to deliver 0.12 and 0 units respectively, but no user comments have been entered about how this is proposed. Grassland enhancement final time to target condition is listed as 10 years.

The Metric shows an on-site net change of 0.02 units which represents 22.40% but this has not been explained anywhere in the documents submitted.

The recommendations in the PEA report included planting trees, native scrub or hedgerow, control and removal of three-cornered garlic. Since the other neutral grassland has already been assessed as being in good condition and medium distinctiveness, realistic proposals for enhancement must be provided to support the claim of a biodiversity net gain of 22.4 % .

Lisa Malter

Ecologist

27/8/24

I raise an objection to this application for the following reasons:

The levelling of the site and importation of soil would result in loss of all habitats within the red line boundary. This is contrary to EBC local plan policy DM 1 and DM11. Surface water drainage information has not been provided as required by DM 6.

Although the intention of this application is to bring new interest to the area and enable ecological teaching this cannot include biodiversity net loss.

The site area is 0.02 ha.

On the Biodiversity net gain section of the application form the applicant has claimed a temporary exemption for non-major developments (small sites exemption). The application date is 28/2/24, however there are emails requesting additional information on 18/4/24 showing that the application was not validated when this exemption ended on 2nd April 2024. The validation date is listed as 27/8/24 on our system, so 10% biodiversity net gain is required. <https://defraenvironment.blog.gov.uk/2024/04/02/biodiversity-net-gain-now-applies-to-small-developments>

A Biodiversity 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 with an explanation of the condition scores 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.
- Demonstrate that proposals have followed the 'mitigation hierarchy': avoiding habitat loss where possible; minimising the extent of negative impacts that cannot be avoided; restoring degraded ecosystems where negative impacts cannot be avoided or minimised; compensating for any residual negative impacts and ensuring at least 10% net gain.
- Demonstrate that proposals maximise the connectivity of the proposed habitat with habitat in the wider area to avoid fragmented or isolated habitat. This must maximise opportunities from other required green and blue infrastructure elements such as sustainable drainage (SuDS).
- Confirm how the proposed Biodiversity Net Gain habitats will be implemented, managed, maintained, monitored and funded for a minimum of 30-years.

I have reviewed the Extended Phase 1 Ecological Assessment by Phillips Ecology (June 2024). The survey area comprised the entire site within the red line boundary. *The habitats present included marshy grassland, hardstanding, scrub, woodland, other neutral grassland and a pond. The main habitats which will be directly impacted by the proposed development include marshy juncus and neutral grassland, a hardstanding boardwalk and a pond. The removal of this habitat will result in a net loss of biodiversity at the site which would be contrary to NPPF.*

If this application is approved, precautionary working methods for hedgehogs, nesting birds, reptiles, great crested newts and badgers will be required. These are listed in section 15 of the report.

The lighting recommendations are quite general, if any exterior lighting is required, an exterior lighting plan can be conditioned.

Vegetation affected by the proposal must be cleared outside of nesting bird season (which is usually March-August inclusive). If this is not possible, a suitably qualified ecologist must check for nesting birds no more than 24 hours before vegetation clearance.

If evidence of an active bird's nest is found during construction, work must stop, and a 5 m buffer must be erected around the nest to protect it from disturbance until after the chicks have fledged and left the nest.

Lisa Malter

Ecologist