

Ecology response for F/25/98800 OAK LODGE, BRIDGE ROAD, BURSLEDON

Construction of 1no. detached two storey dwelling

Clare Martin

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Ecology is raising a holding objection on the basis of errors in the biodiversity net gain calculation due to loss of trees on this site which were agreed in the landscaping plan for the adjacent development and approved in F/20/87926 and X/23/95903 and DC/22/92965.

Also, the surface water drainage plan is not sufficient to satisfy the requirements of DM6.

If these issues can be resolved, the following comments must also be addressed.

Ecology

This site is in a green impact risk zone for great crested newts. There are records of great crested newts in the wider area but the A27 is a likely barrier to dispersal. There are records of bats very close to this site and hedgehogs in the area. The property is approximately 300 m from the Solent and Dorset Coast SPA.

I have reviewed the Ecological Appraisal by Aluco (January 2025). The site has been assessed as predominantly damp neutral grassland with areas of taller ruderal vegetation and scrub. An area of willow scrub was recently cut before the survey. There is also bramble scrub with some small hazel bushes. A veteran oak tree had been on site but fell during a storm in 2022, with only the stump remaining. The discussion on habitat degradation in section 6.4 and the baseline metric assessment information at 6.6.1 states that this willow scrub has been included in the habitat baseline.

Precautionary working methods for badgers, hedgehogs, nesting birds, reptiles, and stag beetles will be required. Section 5.3.8 contains precautions for mammals and technical appendix 4 contains a method statement to protect reptiles.

The shed and any vegetation to be removed to facilitate the development must be removed outside of bird nesting season (which is usually between the beginning of March and the end of August) or if this is not possible then only after being checked for nesting birds by a suitably qualified ecologist up to 24 hours before the start of works. If any active nests are found, work must stop, and a 5 m buffer must be erected around the nest to protect it from disturbance until after the birds have fledged and left the nest.

Biodiversity enhancements recommended in the report (figure 4) include a swift brick on the northern elevation (shown in red on the as proposed northeast elevation) and a bat brick on the southern elevation of the new dwelling (shown in dark blue on the as proposed southeast elevation).

If any exterior lighting is required for security purposes, the guidelines given in section 5.3.6 of the report must be followed. A lighting diagram can be conditioned.

Biodiversity net gain

The excel version of the Statutory Biodiversity Metric was submitted on 28/1/25 but had not been validation checked by Mycelia software. The validation error report states:

- *The net gain for area habitats is -65.65%. It must be at least 10.0%.*
- There are net losses of Medium distinctiveness *area habitats* in 2 broad habitat groups, and too few gains at higher distinctiveness categories to offset these losses. The broad habitat groups concerned are:
 - Heathland and shrub, which loses 0.03 BU, from "Heathland and shrub - Bramble scrub" (0.019 BU pre-intervention, and 0.0 BU post-intervention, so a loss of 0.019 BU), "Heathland and shrub - Willow scrub" (0.01 BU pre-intervention, and 0.0 BU post-intervention, so a loss of 0.01 BU)
 - Grassland, which loses 0.61 BU, from "Grassland - Other neutral grassland" (0.61 BU pre-intervention, and 0.0 BU post-intervention, so a loss of 0.61 BU)
- There are too many net losses of Low distinctiveness *area habitats*, and too few gains at higher distinctiveness categories to offset these losses. The net change of Low distinctiveness *area habitats* is 0.099 BU.

Section 6.8 in the Ecological Appraisal report states: *In order to achieve 10% net gain a total of 0.91 credits will be required in total. The metric shows a deficit of 0.63 habitat credits, which are proposed to be purchased from an off-site location or a registered 3rd party provided. Purchase of credits is acceptable, however the number of credits required may need to be adjusted to account for loss of trees.*

F/20/87926 and X/23/95903 and DC/22/92965 were the applications which permitted development of the wider Oak Lodge site. Landscaping was addressed in condition 10h. As part of the landscaping of the wider site for those applications, at least 7 trees were proposed to be planted in this area (site plan by R & R Design Studio, Rev E, August 2023). In comparing the proposed site plans for both applications, it is clear that the proposals for this site would not allow those trees to be planted either, which would result in net loss of a total of 12 trees.

Condition 10h (F/20/87926) A landscaping scheme to cover all surfacing, trees and planting, all site boundaries, specific details for the north-west site boundary, a timetable for completion of the landscaping, and a site wide management and maintenance plan, in general accordance with arboricultural report reference 19/12/241//NH v5.0 dated November 2020; planting plan reference 1038-5400 rev E; and landscape management and maintenance plan dated November 2020 rev B; and taking account of the presence of the on-site sewer and associated buffer

The Ecological Appraisal report states that there were three trees on site, however the site plan in Figure 5 shows red circles (to be removed) for at least six trees (in addition to the veteran tree lost in a storm in 2022 which does not need to be included). An aerial photo on

Google Earth (imagery date 17 September 2024) shows these trees in place. No replacement trees have been proposed on site.

The metric will need to be amended and re-submitted and the EBC tree replacement policy will need to be followed as written in the Trees and Development Supplementary Planning Document (available at [adopted-trees-and-development-spd-april-22.pdf](#)).

Surface water drainage

The surface water drainage plan shows proposed surface water drainage running under the house (which is not acceptable) and then into what appears to be the surface water drainage for the adjacent development (F/20/87926). Simply collecting and discharging the water from this site into the adjacent system is not acceptable. Surface water drainage must meet the requirements of DM6, with filtration required before discharge off site. The ditch which receives the surface water drainage from the adjacent site discharges into the protected waters of the River Hamble.

The drainage strategy must also show that the pollution hazards are mitigated fully (as shown in the Ciria SuDS manual). Attenuation must meet the current standards of a 1:100 year flood and at least +40% for climate change and mirror greenfield rates before development as this is not a previously developed site. The adjacent site uses brownfield rates.

Each of the catchments for the adjacent site has permeable paving which forms part of the larger surface water drainage strategy. The Flood Risk Assessment and Surface Water Drainage Strategy by UNDA (April 2019) for the adjacent site states that infiltration is not feasible. The Ecological Appraisal report states that there is damp grassland on site which implies that the water table is high in this area and the surface water drainage strategy will need to account for this.

Permeable paving can be considered as one form of filtration and the use of water butts to store water for use in the garden must be included.

Lisa Malter

Ecologist