

Ecology response 27 2 25 for F/25/98851 SWINLEY, PYLANDS LANE, BURSLEDON, SOUTHAMPTON, SO31 1BH

Erection of 1no. five bed dwelling in rear garden with detached garage, amenity space, parking and shared access off Pylands Lane (re submission of F/24/98257)

Clare Martin

27/2/25

I have reviewed the additional biodiversity enhancements proposed for this self-build site. Although a biodiversity metric has not been submitted to demonstrate measurable net gain, in my professional opinion, and in this case only, and with these proposed enhancements, the site probably will deliver a minimal net gain which will satisfy the requirements of the NPPF and DM 11. I remove my holding objection to this application.

The proposed enhancements are: 2 no. built in bat boxes, 2 no. built in swift nest boxes, 2 additional bird boxes, native hedge planting along the western boundary, additional beech hedges, removal of the closed board fence, additional areas of plants for pollinators, an additional area of flowering meadow grassland, changed the sedum roof to a biodiverse green roof, 2 no. stag beetle loggeries and donation of 10 trees to the Hampshire County Council tree planting programme. The planting specifications can be submitted before determination or can be conditioned.

If possible, the two built in bat boxes should be located on the southern elevation and the two swift nest boxes should be located on the northern elevation under the eaves due to the temperature needs of these species. Bat roosts need a warmer elevation, and swift boxes need to be cooler so that the nestlings do not overheat. If this is not possible, I would recommend the swift boxes on the western elevation gable end where they would be more shaded by the retained trees on the western boundary and the bat boxes on the eastern elevation where there is no shade. The links to the Bat Conservation Trust, Hampshire Swifts and Swift Conservation websites will provide additional information and advice-line phone numbers. The two bird boxes on the northern elevation are appropriate and should have different entrance hole sizes to accommodate a wider range of bird species. The RSPB website has a buying guide to nest boxes and bird houses which explains this clearly. A bug hotel and a composting area as mentioned in the email of 24/2/25 will also provide enhancements.

Lisa Malter

Ecologist

18/2/25

I raise a holding objection to this application because there is still insufficient information to demonstrate **measurable** biodiversity net gain.

Biodiversity net gain

The previous application F/24/98257 was refused. One of the reasons for refusal was Insufficient information has been provided to demonstrate how the proposed development will achieve a biodiversity net gain. As such the development is contrary to Policy DM11 of the Eastleigh Borough Local Plan (2016-2036) and provisions within the National Planning Policy Framework.

The applicant is claiming the self-build exemption from the requirement of 10% biodiversity net gain.

A Preliminary Ecological Appraisal report by Arbtech (July 2024 survey date and submitted with applications H/24/97888 and F/24/98257) has been submitted in support of this application. The report states *that a full impact assessment could not be undertaken as the site was being cleared at the time of the survey and the habitats on site had already been removed.* The report has been compiled retrospectively using pre-clearance aerial photos. Figures 2 and 3 show clearance to bare earth.

Discussion of the reasons for clearance can be found in the Revised Design and Access statement by BPS Design Consultants Ltd (January 2025). On page 11 it states: *The proposed drawings provide sufficient information to demonstrate how the proposed development will achieve a biodiversity enhancement but not a net gain as the site is exempt.* This is a misinterpretation. The enhancement must be above the neutral position of no net loss, so there must be some measurable net gain, just not the full 10% required of non-exempt applications.

The NPPF (December 2024) requires no net loss and some measurable biodiversity net gain.

Paragraph 187, section d requires no net loss

187. Planning policies and decisions should contribute to and enhance the natural and local environment by

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

and Paragraph 192 section b mentions securing measurable gains

192. To protect and enhance biodiversity and geodiversity, plans should:

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

To ensure measurable net gain for self-build and custom-build applications, Eastleigh Borough Council requires the submission of a statutory biodiversity metric. The small sites metric can be used for this site. The UK Habs map of the site prior to clearance provided in Appendix 2a must be used as the habitat baseline.

Comparing this map with the post-clearance map in Appendix 2b I can see that the line of trees (other woodland broadleaved) has remained the same (neither lost nor gained), and the large area of vegetated garden was removed. Retention of the line of trees does not

count as enhancement. Enhancement means adding something additional. Most of the post-development area would be occupied by the proposed house, patio, shed and amenity lawn.

The proposal for this application includes a sedum roof on the garage, and a native beech hedge extending from the retained line of trees on the western boundary, across the northern boundary and down part of the eastern boundary. This is a good start, but linear habitat such as hedging cannot be used to replace lost area habitat for the purposes of biodiversity net gain. They are considered separately by the metric. Amenity lawn is not considered to have biodiversity value whereas a flowering wildflower lawn would provide resources for pollinators. I don't see any flowering plants included in this plan other than the sedum roof on the garage. A biodiverse green roof would provide more of an uplift than a sedum roof. The addition of night-scented flowering plants would enhance the garden for moths as food for bats.

Ecology

Once some measurable biodiversity net gain can be provided, the recommendations for mitigation and enhancement for protected species in the Ecological Appraisal, although designed for the previous applications, still have some relevance to this application. The proposed house must include at least one built-in swift nest box and one built-in bat box. A sparrow nest box could be installed on the house and a nest box for common bird species could be installed on a retained tree. Natural refugia for reptiles and hedgehogs could be built in the garden. A plan showing the location of these features can be conditioned. It should also show the position of external lighting to ensure that the entrance to the bat box is not illuminated.

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>)

Swift nest boxes are best positioned under the eaves or on walls facing north, northeast or north-west out of direct sunlight, five metres above the ground, with clear adjacent airspace so swifts can access them in a high-speed direct flight.

(<https://www.swiftconservation.org/Nestboxes%26Attraction.htm>)

Additional information is available at:

<https://sussexwildlifetrust.org.uk/discover/in-your-garden/article/31>, planting for bats

<https://www.wildaboutgardens.org.uk/sites/default/files/2022-03/WAG16%20Bats%20updated%202022%20WEB.pdf> - Stars of the Night guide to attract bats into your garden

<https://www.rhs.org.uk/science/conservation-biodiversity/wildlife/plants-for-pollinators>

<https://www.bats.org.uk/our-work/buildings-planning-and-development/bat-boxes>

<https://www.hampshireswifts.co.uk/nesting>

<https://www.rspb.org.uk/birds-and-wildlife/advice/how-you-can-help-birds/nestboxes/nestboxes-for-small-birds/>

<https://www.swift-conservation.org/OurLeaflets.htm>

<https://www.hedgehogstreet.org/help-hedgehogs/hedgehog-homes/>

www.bats.org.uk/resources/guidance-for-professionals/landscape-and-urban-design-for-bats-and-biodiversity

<https://ptes.org/my-garden/>

<https://www.ukbutterflies.co.uk/foodplants.php>

Surface water drainage

The surface water drainage proposals from the previous applications were acceptable, however they have not been submitted for this application. Proposed soakaways and pipes must be shown on a plan. The extent and specification of permeable block paving discussed in the previous application must also be shown in this application.

Lisa Malter

Ecologist