

Ecology response for F/25/98831 BOUNDARY ACRE, BURSLEDON

Construction of detached, two-storey, five-bedroom dwelling and detached double garage, with associated landscaping, retaining wall to eastern bank boundary and access from Boundary Acre.

nearest post code SO31 1DP, grid reference SU485116

David Huckfield

4/3/25

Summary

I raise a holding objection to this application as the proposals would result in biodiversity net loss which is contrary to Local Plan policy DM 11 and NPPF (December 2024) paragraphs 187d and 192 b.

Treatment of Japanese knotweed must be started as soon as possible.

There is a discrepancy in the red line boundary of the site. The access road onto the site is included in the proposed site plan but not in the BNG and PEA baseline habitat plans.

Further surveys are required before determination. Survey timing is important as there are limited survey windows for these species as discussed below.

Biodiversity Net Gain

The site access in the southeast corner of the site is described as *an unmanaged strip of native and non-native planting that has been allowed to expand over the last few years...* which is *In need of clearing up and managing*. This area has not been included in the site plan in the PEA or the BNG baseline habitats (Map 2) although the red line boundary includes the site access road. The discrepancy in the red line boundary must be resolved and the entire site, including the access road must be included in the BNG calculations. It must not be cleared or managed before it has been surveyed and included in the baseline habitat.

The Mycelia validation report shows the following Metric error details:

- The net gain for *area habitats* is -39.94%. It must be at least 10.0%.
- The net gain for *hedgerows* is 0.0%. It must be at least 10.0%.
- There are net losses of Medium distinctiveness *area habitats* in 1 broad habitat group, and too few gains at higher distinctiveness categories to offset these losses. The broad habitat group concerned is:
 - Woodland and forest, which loses 0.23 BU, from "Woodland and forest - Other woodland; mixed" (0.58 BU pre-intervention, and 0.35 BU post-intervention, so a loss of 0.23 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 0.0 BU.

The site area is given as 1350 m² (approximately 0.1 ha). On the planning application it states that the pre-development biodiversity value is 0.58 units, calculated on 7/11/2024 but with a metric publication date of 24/1/2025 which does not make sense. The Excel spreadsheet confirms that the metric was completed on 24/1/25 and version 1.0.3 was published on 23/7/24.

The Biodiversity Net Gain Feasibility Report by Ecosa (January 2025) states *The anticipated post-development units are 0.35 habitat units (not 0.58 habitat units) and 0.04 hedgerow units. This represents a zero net loss in hedgerow units and a net loss of 0.23 habitat units or a 39.94% loss in habitat units. The report proposed that this loss can be offset and a net gain in area and hedgerow units can be achieved by the purchase of off-site units.* To achieve 10% biodiversity net gain 0.64 habitat units and 0.05 hedgerow units are required. The metric shows 0% hedgerow units would be required to achieve 10% net gain, but this may be a rounding error.

I raise a holding objection to this application as the proposals would result in biodiversity net loss which is contrary to Local Plan policy DM 11 and NPPF (December 2024) paragraphs 187d and 192 b. A specific proposal for purchase of off-site units must be submitted and approved. As there currently no local habitat bank providers available in this national character area (126 South Coast Plain), units would need to be purchased from a habitat bank in a neighbouring character area which will have higher cost implications.

The habitats on site have been described as Other mixed woodland and Non-native and ornamental hedgerow. In section 4.2.3 Table 2 these have medium and very low distinctiveness respectively, however in section 4.2.5 it states that hedgerows are a BAP Priority habitat, and the hedgerow has been assigned high strategic significance. The Other mixed woodland has been assigned medium strategic significance due to the area being within an HBIC Ecological Network Opportunities area.

The report proposes that enhancement of the retained Other mixed woodland habitat could provide an uplift in area biodiversity units, however the tree removal proposals (as shown in the Tree Constraints Plan by Treecall Consulting Ltd, September 2024) to be considered when assessing the habitat baseline. The EBC tree replacement policy must also be taken into account.

The report states that there is scope to deliver 10% net gain in hedgerow units on site, which we would encourage. All submitted documents must be coordinated to ensure that they agree with each other.

Ecology

This site is in an amber impact risk zone for great crested newts. There are records of adders, common lizard, and slow worms to the north of the site and records of bats nearby. There are records of badgers in the wider area. The land to the north of the site has planning permission for a development of 106 homes but only drainage works have been done in April 2021 and no work since then.

I have reviewed the Preliminary Ecological Appraisal by Ecosa (January 2025). There is potential habitat for roosting, foraging and commuting bats, badgers, common reptiles, terrestrial great crested newts, hazel dormice, nesting birds, invertebrates including stag beetles and pollinating insects, hedgehogs and common toads.

Potential bat roost features were recorded on trees T1, T2, T4, T5, T8, T9g (a), T12g (f), T15g(a), T16 and T17. Trees T3, T4, T5, T8 and T17 are proposed to be removed. Any tree with potential bat roost features must be surveyed using an endoscope during the active bat survey season.

The invasive Schedule 9 species Japanese knotweed *Reynoutria japonica* and *Rhododendron* sp. were recorded on site. Japanese knotweed must be eradicated from the site and a specialist contractor is required to ensure that it does not spread into the wild or into any neighbouring properties. Cherry laurel was also present and can spread if not controlled. Treatment of Japanese knotweed must be started as soon as possible, as it often takes several years to eradicate and must be done before any works are started on site.

The habitats on site have been described as Other mixed woodland and Non-native and ornamental hedgerow. The hedgerow was recorded as ornamental beech *Fagus sylvatica*, but this is a native species, it just isn't a mixed native hedgerow.

Further surveys are required before determination.

These are endoscopic inspections of trees with potential bat roost features (May-August/September), reptile presence/absence surveys (April, May and September/October), eDNA surveys for great crested newts of the 4 ponds within 500 m radius (mid-April-end of June. Section 5.10.2 mentions an on-site pond, but this is likely to be a copy and paste error as no pond is shown in the Baseline Habitats map (map 2). The location of Japanese knotweed and rhododendron must be shown on the map. A grid reference/target note is required for these species.

The following notable and near threatened plants associated with woodlands and recorded within the desk study results were wild strawberry *Fragaria vesca*, wood-sorrel *Oxalis acetosella*, sanicle *Sanicula europaea* and goldenrod *Solidago virgaurea*. As the field survey was carried out in November, it would not have been possible to determine whether any of these species were growing on site. An update walkover is required in May when most of these species would be flowering.

The proposed site plan in the DAS shows T4 oak proposed to be removed and T3 oak cut back. The northwestern corner of the house would still be in the root protection zone of T3 and the tree can be expected to grow back towards the house in this area. T2 is also close to the proposed house. The use of piles and ground beams has been suggested for mitigation in root construction area (T5) of the garage and shown on the proposed plans in the northern corner of the garage, but this has not been shown on the same plan for the house. There will be pressure from residents to keep the trees cut back to avoid branches impacting on and shading the house which would impact the trees in future.

On the Tree Constraints Plan by Treecall Consulting Ltd (September 2024) tree T5 is listed as birch, dead unsafe and 11 trees in total are proposed to be felled. This would represent a loss of biodiversity.

Surface water drainage

The DAS mentions sustainable drainage for surface water. A surface water drainage plan is required. If soakaways are proposed, this must be supported by soil infiltration test results. The surface water drainage must conform to policy DM6 and incorporate at least one form of filtration. Permeable paving can be considered.

Lisa Malter

Ecologist