

Ecology response for F/25/99153 Land off Brook Lane, Broadoak, Botley, SO30 2ER

Construction of 1no. three bed single storey dwelling

Clare Martin

9/7/25

Summary

I raise a holding objection due to the following:

There is a discrepancy between the red line boundary on the site plan and the red line boundary on the baseline habitat plan. The biodiversity metric has been submitted showing only modified grassland and one rural tree with a total site area of 0.02 ha. The site area on the application form is given as 28856 m² (2.89 ha).

The biodiversity metric shows a net loss of 78.46% of area habitats and -0.14 biodiversity units. The application must demonstrate no net loss and at least some measurable net gain as required by DM 11 and the NPPF. A vegetated garden is mentioned in the biodiversity metric but is not shown on any of the plans.

One rural tree is proposed to be lost, with no other trees specifically proposed to be added. This does not accord with the EBC tree replacement policy.

No information has been given on surface water drainage or how the water quality requirements of DM 6 would be satisfied. A surface water drainage plan is required. Pollution hazards must be mitigated as shown in the Ciria SuDS simple index approach.

More coordination is required to integrate the information in the DAS, the PEA, the BNG metric and the drainage plan.

Ecology

This site is in a green impact risk zone for great crested newts. There are records of bats, badgers, hedgehogs, toads and grass snakes in the wider area.

I have reviewed The Preliminary Ecological Appraisal and Biodiversity Net Gain Report by Aware Ecology Ltd (March 2025). There was no evidence of protected species on site, but suitable habitat for nesting birds, reptiles, GCN, and badgers was found adjacent to the site, and an outlier badger sett was found within scrub adjacent to the site, but approximately 20 m to the east of the site. The location of the badger sett must be provided to the LPA.

Precautionary working methods to protect these species have been recommended in section 4.4 of the report. These are appropriate and must be adhered to during construction.

These include:

maintaining a 30-metre buffer around the badger sett: No direct impact on badgers is predicted during the works. However, due to the proximity of the outlier sett, a buffer zone should be established to prevent heavy machinery from going within 30m of the opening

and light machinery from going within 20m of the opening. It is advisable to fence the protection zone off, leaving a gap of 25 cm at the base of the fence.

implementing a sensitive lighting plan to protect foraging bats; and ensuring appropriate storage of materials on pallets off of the ground to prevent harm to reptiles or amphibians and as far as possible from hedgerows, scrub or potential habitat .

Any excavations or open pipes will need to be covered at night, or provided with a small animal escape ramp (a rough board at a shallow angle) to allow animals to escape if they fall in. They must be checked each morning to ensure animals have not been trapped.

No fires can be lit on site.

Waste must be stored in a skip and not be allowed to accumulate in piles which could be used by wildlife. Any chemicals and fuels must be stored carefully and away from potential wildlife habitat.

Any animals found on site should not be handled but be allowed to move away to a place of safety on their own.

Any on-site work to suitable habitat should be completed outside the breeding bird season (March to August inclusive) or only after a pre-works survey/search by a suitably experienced ecologist.

The 2018 lighting guidance recommended in the report is out of date. The latest updated lighting guidance note (GN08/23) should be followed. This is available at [Guidance Note 8 Bats and Artificial Lighting | Institution of Lighting Professionals \(theilp.org.uk\)](https://theilp.org.uk/Guidance%20Note%208%20Bats%20and%20Artificial%20Lighting).

The ecological enhancements recommended are a bat box, a bird box, a swift brick, insect bricks and native species planting. These are appropriate but must be shown on a biodiversity enhancement plan to ensure that they are located on the correct elevations of the house and that the entrance of the bat box is not illuminated by more than 1 lux.

Retention of boundary hedgerows and trees is proposed, however a silver birch tree is proposed to be lost, with no replacement trees shown on the plan. This is contrary to the EBC tree replacement policy.

Only 1 silver birch tree is within the red line boundary shown on the baseline habitat map of the site in Figure 4 of the PEA but this is part of a group of trees nearby. An arboricultural consultation is required with tree protection measures specified to ensure that development of this site would not affect these other trees.

Biodiversity Net Gain

The proposal is claiming the self-build exemption from the requirement of 10% BNG. Application site must demonstrate no net loss and some measurable net gain. This has not been demonstrated so the application does not conform to the requirements of DM 11 and the NPPF.

The red line boundary shown on the proposed site plan is the area of the entire property. The site area is listed as 28856 m² (2.89 ha) on the application form.

The biodiversity metric shows a net loss of 78.46% of area habitats and -0.14 biodiversity units. The application must demonstrate no net loss and at least some measurable net gain as required by DM 11 and the NPPF.

The submitted biodiversity metric proposes that 0.024 ha (0.049 biodiversity units (bu)) of modified grassland in poor condition is lost and 0.02 ha (0.039 bu) of vegetated garden is created. There is a net increase in developed land sealed surface (0.012 ha). This represents a net loss of biodiversity. The residential garden has not been shown on any of the plans. The proposed site plan shows the proposed dwelling and what appears to be a paved area for car parking. The only habitat enhancement recommended in the PEA was to plant the surrounding grassland with a shade tolerant seed mix such as Emorsgate EH1. It is not clear why a shade tolerant mix was recommended or where it is proposed to be planted. No recommendations for management were provided.

One rural tree is proposed to be lost, with no trees proposed to be added. This does not accord with the EBC tree replacement policy.

Surface water drainage

Permeable surfacing has been mentioned in the Design Access Statement by Planning By Design (no date), but this has not been shown on a drainage plan. Soil permeability testing must be submitted to demonstrate that permeable surfacing would function on this site.

Ditch drainage has also been mentioned, but there is no information given about any ditches and they are not shown on any of the plans.

I have reviewed the Nutrient Neutrality Assessment & Mitigation Strategy report by Water Design Engineers (June 2025). This is labelled the Drainage Strategy Report in the documents list but does not include surface water drainage.

The applicant is proposing to install an on-site package treatment plant for foul sewage and plant an apple orchard of 10 trees to mitigate 1.36 kgTn/yr of total nitrogen on-site. It is not clear how this would work, although references have been provided. Is the applicant proposing to fertilise the apple trees with effluent from the foul sewage treatment plant? If an apple orchard is proposed on site it should be shown on a plan. The area where it would be planted must be described and if it is replacing other habitat this must be accounted for in the biodiversity metric and the red line boundary must include this area. Planting 10 apple trees would probably mitigate for the loss of the birch tree.

No information has been given on surface water drainage. The water quality requirements of DM 6 must be satisfied.

Lisa Malter

Ecologist