

Ecology response 3 11 25 for F/25/99638 2 WESTERN ROAD, WEST END, SOUTHAMPTON, SO30 3EL

Erection of 1.no 3-bedroom dwelling

Gregg Chapman

3/11/25

Biodiversity net gain

The Arboricultural Method Statement (dated 8/8/25) shows that hedgerow G3 which runs along most of the northwestern boundary of the property is proposed to be removed. This has not been shown on the Habitat Map in Figure 3. Only four individual trees and a hedgerow along Western Road are shown on the Habitat Map. The photos in the PEA has not described this vegetation and the photos do not show it, but it is shown on the aerial photo of the site in Figure 2. As noted by the Tree officer, the tree survey that should have accompanied the tree protection plan has not yet been submitted.

Although this application is exempt from providing 10% biodiversity net gain under the self-build and custom build exemption, loss of a hedgerow is a net loss of biodiversity which is contrary to the NPPF and DM 11. Further information is required about the plants that would be removed and how net loss of biodiversity will be avoided.

Ecology

I have reviewed the recently submitted Preliminary Ecological Appraisal (PEA) report by enims (October 2025) and the amended plans (Rev A) for the house, car port and a soakaway. The report states that there is potential habitat for commuting and foraging bats, reptiles, hedgehogs and nesting birds. Great crested newts have been considered likely absent from the site.

The PEA report states that the proposed works to the building provides the opportunity to enhance the application site by incorporating additional bat roosting spaces, nesting spaces for specialist bird species and nesting spaces for solitary bee species. These are good features but are not enough to compensate for loss of a hedgerow.

We recommend built-in bat bricks/boxes and swift bricks/boxes as they cannot fall off and do not require maintenance.

The locations and specifications of bat and swift bricks/boxes, bee bricks and any proposed exterior lighting must be shown on an elevation plan and be approved before determination. Flowering plants for pollinators must be added to the garden to replace vegetation lost to the development.

The precautionary working methods recommended in the PEA report are appropriate and must be implemented.

Any external lighting used should be bat-friendly and not illuminate boundary vegetation, particularly the offsite woodland. Further details can be found in the Guidance Note 08/23:

Bats and artificial lighting in the UK (Bat Conservation Trust and Institute of Lighting Professionals, 2023).

Removal of any vegetation should be undertaken outside of the bird nesting season (i.e., works should take place September through February) to avoid acting unlawfully. If this is not possible, then vegetation must only be removed following a nesting bird check carried out immediately prior to works (or within 24 hours) by a suitably qualified ecologist. Any active nests must remain 'in situ' with an appropriate vegetation buffer until young have fledged and the nest is no longer in use.

To avoid potential harm to reptiles or hedgehogs that may be in the local area at the time of works, the following simple measures should be followed:

- *The work site should be kept tidy at the end of each shift, with chemical and equipment stored securely.*

Excavations should be backfilled or covered at night to prevent reptiles or hedgehogs from falling in. If this is not possible then a plank should be left in the excavation at night at an angle no greater than 45 degrees to provide a means of escape.

- *Removal of storage materials, debris piles, leaf litter and any ground vegetation within the boundary vegetation habitats should be undertaken carefully (by hand, not using a digger) and with consideration to the potential presence of reptiles and hedgehogs. Any individuals encountered should be allowed to move away safely or be moved to an area of similar habitat away from the works.*

Rhododendron and cherry laurel reproduce through seeds which can be easily transported by vehicles and in contaminated soil. Seeds remain dormant in the soil for several years and will germinate when conditions are favourable. Care should be taken to avoid the spread of the plant from the works site during construction. Any plant material or soil removed from the site should be disposed of appropriately, ie. at landfill as contaminated soil. The soil can be retained on site if possible.

Surface water drainage

A soakaway has been proposed for this site. If a soakaway is proposed, soil infiltration test results must be provided.

Lisa Malter

Ecologist

2/9/25

This site is in an amber impact risk zone for great crested newts. There are records of common reptiles, bats and hedgehogs near the site. The aerial photo of the site available on Google maps shows that the site is fully vegetated, with trees and shrubs, including rhododendron.

I raise a holding objection due to the lack of relevant ecology and biodiversity net gain information.

Bats

I have reviewed the Preliminary Roost Assessment report (July 2025) and the Bat Roost Survey report (September 2025) by enims.

The report states that *The predominant aim of the preliminary assessment was to establish whether the buildings at site had the potential to support roosting bats*, however since this application does not involve demolition of any existing buildings, I don't think these reports are relevant for this application. It is not clear whether demolition of the existing bungalow is proposed at the end of the build, but it is not within the red line boundary shown on the site plan for this application.

The application for which the reports were written was *to extend the existing dwelling (B1) and remove the current garage (B2)*.

This application is for the addition of a dwelling on part of the garden, which has not been properly described in either of these reports. The garden and the trees with potential bat roost features (shown in Figure 2 of the Bat Roost Survey report) should have been assessed in a preliminary ecological appraisal (PEA) report, not a preliminary roost assessment (PRA).

Some of the photos in the PRA report show some vegetation around the existing garage (photo 9) and around the trees on the southern site boundary (photo 14) but this is not sufficient to characterise the site for this application.

The trees were considered to have potential bat roost features (PRFs) and the report states that they should be retained and protected where possible. If any work is proposed which could impact the trees, they need to be assessed individually for potential bat roost features. *PRF's were identified within the trees onsite within the vegetated gardens of B1. PRF's of knotholes were identified within the semi-mature sweet chestnuts (Castanea sativa) onsite on the southern boundary (App. B Photo 14-16).*

The Tree protection Plan in the Arboricultural Method Statement shows most of the site would be cleared with the exception of T8 and T9. G3, which is a significant linear habitat feature would be removed to facilitate the development. T7 is proposed to be removed due to being put into category U. A tree survey has not been submitted but has been requested by the EBC tree officer. This would also be helpful for ecology.

Great crested newts

Amber (suitable habitat, likely to be present) – *When development falls into the red or amber zones on the impact risk map, developers MUST prove to their local planning authorities that their development plans pose 'no risk' to great crested newts.* The first step is to provide photos of any areas of the garden which would be affected by the development. If there is suitable habitat on site, the applicant must provide evidence from an ecological consultant on whether great crested newts are likely to be using the site.

Reptiles

The first step is to provide photos of any areas of the garden which would be affected by the development. If there is suitable habitat for reptiles on site, the applicant must provide evidence from an ecological consultant on whether reptiles are likely to be using the site.

Hedgehogs

If the application is permitted, precautionary working methods to prevent harm to hedgehogs will be required.

Biodiversity net gain

The proposal in the planning statement is for a self-build family home and the applicant is claiming the self and custom build exemption from providing 10% biodiversity net gain, however some measurable biodiversity net gain is still required. It is not clear whether demolition of the existing bungalow is proposed at the end of the build, but it is not within the red line boundary shown on the site plan for this application.

Most of the vegetation would be cleared from the plot to accommodate this proposal. This would result in a net loss of biodiversity. Biodiversity enhancements will be required in accord with Local Plan policy DM 11 and NPPF (December 2024) paragraphs 187d and 192 b.

The habitat lost to the proposed development must be described and measured. A biodiversity metric is required to demonstrate that some measurable biodiversity net gain would be achieved on this site.

The ecological enhancements recommended in section 4.4 of the Bat Roost Survey report were to provide bat boxes, bird boxes (especially swift nest boxes) on buildings and trees on the property. Lighting recommendations were also given in section 4.3. Bee bricks were recommended.

In addition to physical structures, the garden should provide flowering plants for nectar and pollen and suitable habitat for invertebrates. A variety of flowering plants should be chosen to provide a long flowering season, and fruits and seeds should be left on the plants to provide food for birds and other wildlife.

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](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>

Additional ecology information

The house B1 was assessed to have high bat roost potential with droppings found in the loft space. The garage B2 was assessed as having low bat roost potential. Three emergence surveys were done, and no bats were seen emerging. However, there were droppings found in the loft, which makes this building a confirmed bat roost. The surveyor should have sent the droppings off for DNA analysis so that the roost can be characterised. Even if it is only used occasionally and was not used during the period of the emergence surveys this is still a confirmed bat roost due to the presence of droppings. If this building is proposed to be demolished at any time it will need a license, mitigation, precautionary working methods, and compensation. The indicative street scene drawing (also included in the planning statement) shows a much larger house in place of the existing bungalow and no trees at the front of the property.

As noted in the Bat Roost Survey report (p 13 and 14), *it is a criminal offence to:*

- *Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time)*
- *Intentionally or recklessly obstruct access to a bat roost.*

Surface water drainage

No surface water drainage information has been provided. The proposed elevation plans and the proposed floor plans are labelled for Drainage, but they don't contain any drainage information. If a soakaway is proposed, soil infiltration test results must be provided.

Lisa Malter

Ecologist