

Osmond, Gary

From: Malter, Lisa
Sent: 28 June 2022 15:22
To: Osmond, Gary
Subject: F/22/93195 BROADWAY FARM, BROAD OAK, BOTLEY SO30 2EU

Hi Gary,

I have reviewed the following documents in addition to those previously reviewed for F/21/91859 (withdrawn).
Landscape Design and Access Statement by fabrik (May 2022)
Planning Statement by Luken Beck (June 2022)
Landscape and Visual Appraisal with Impact Statement by fabrik (April 2022)
Surface Water Drainage strategy by Pitman Associates (May 2022)
Aerial photo imagery, Google Earth, imagery date 5/6/2020

Ecology

Objection due potential adverse effects on Woodhouse Gully Wood SINC.

Aerial photo imagery from June 2020 (Google Earth, imagery date 5 June 2020) shows that the north eastern part of the site was not paved. I cannot find any record of planning permission being given to pave this area which is adjacent to the Woodhouse Gully Wood SINC, classified as ancient woodland (1A/1Cii). This is a breach of planning regulations. This area must be restored to the condition it was in before the hard standing was installed, and **a minimum of a 20 m buffer to the SINC must be provided**. No development can be located within this buffer zone. The site layout must be changed to remove the parking area away from the boundary in the north east corner of the site. Additional parking space can be gained in the field to the south of this proposal, to the east of the existing parking area. . The SINC buffer must not be shaded by the proposed building.

Local plan policy DM 11 Nature Conservation states that *Development will not be permitted if it results in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees), unless there are wholly exceptional reasons and a suitable compensation strategy exists.*

The DAS states that the ecology issues have been resolved in the LDAS, but this issue is still outstanding.

As I stated in my ecology consultation response to F/21/91859:

This site is bordered on the north and eastern edges by the Woodhouse Gully Wood SINC. This is designated as an Ancient semi-natural woodland and other semi-natural woodland if they comprise important community types of restricted distribution in the County (1A/1Cii). The stream running through the SINC is Woodhouse Gully, a tributary of Pudbrook Lake, which is a tributary of the protected waters of the River Hamble. A minimum buffer of 20 m free of any development will be required to protect this ancient woodland SINC and the stream.

Whilst the presence of ancient woodlands has been acknowledged in the Landscape and Visual Appraisal with Impact Statement by fabrik (April 2022), in section 3.1.1 Designations, Woodhouse Gully Wood SINC has not been listed nor identified as ancient woodland. The following statement is made *The woodland tree belt abutting the eastern and northern boundaries of the Site is designated as Site of Importance for Nature Conservation (SINC)*, but this does not acknowledge the importance of this irreplaceable ancient woodland habitat or the stream, nor the need to protect them.

Figure 3.1 Local Landscape Related Designations (Fabrik 2022) shows this SINC on the northern and eastern boundaries but not as an ancient woodland.

Appendix A to the Eastleigh Borough Council Biodiversity SPD (2009) available at: <https://www.eastleigh.gov.uk/media/8294/spd-biodiversity-dec-2009-appendices.pdf> shows that Woodhouse Gully Wood SINC is identified as a SINC under criteria 1A/1Cii.

1A means that this is designated as an Ancient semi-natural woodland and other semi-natural woodland if they comprise important community types of restricted distribution in the County. 1Cii means that this is designated as Wet Woodlands such as alder or willow woods and birch bog woods which support a good diversity of woodland and/or marsh/swamp/mire species.

This definition is confirmed in the HBIC Criteria for the Selection of Sites of Importance for Nature Conservation (SINCs) in Hampshire (updated October 2021) available at:

<https://documents.hants.gov.uk/biodiversity/SINCCriteria.pdf>.

The DAS states that the ecology issues have been resolved in the LDAS, but this issue is still outstanding.

In section 6.5 HEDGE *A native hedge mix is proposed on top of the mounds to bolster the tree belt. To encourage a bushy and fruiting hedgerow a less frequent pruning regime, all hedgerow is proposed to be cut twice every year when they are fully established, to allow fruits to be consumed by birds and other wildlife and avoid impacts on breeding and nesting birds.* After establishment, pruning should be done on a 3 year rotation to ensure a continuous supply of fruit, flowers and seeds for pollinators and other wildlife throughout the year. This can be done by pruning the top one year, and each side in turn in the next two years, or only pruning 1/3 of the hedge each year.

There seems to be a disconnect between the landscape features (hedgerows, potential reptile habitat) shown on the PEA Phase 1 habitat map, the Landscape and Visual Appraisal with Impact Statement by and the existing block plan. It is not clear what is being proposed for compensation, mitigation and biodiversity enhancements so this must be clarified. If hedgerows are proposed to be removed, then new hedgerows would be compensation, not enhancement.

Surface Water Drainage

Woodhouse Gully is a tributary of Pudbrook Lake, which is a tributary of the protected waters of the River Hamble (Upper Hamble Estuary and Woods SSSI).

Policy DM6 states that SuDS schemes should include at least two forms of above ground naturalised filtration. The SuDS proposal for this site includes a filter drain, buried attenuation tanks and discharge directly to a water course. A hedgerow is shown planted next to the filter drain, but the roots of these shrubs could interfere with the drainage pipe.

The pollution mitigation indices for a filter drain and a downstream defender are shown, however the exceedance flows would bypass these devices and discharge directly into the watercourse. The Surface Water Drainage strategy by Pitman Associates (May 2022) states that *exceedance flows will not present a danger to people or property*, but they would present a danger to the watercourse. It also states that *There is no scope for incorporating landscaping or vegetative systems within the drainage system*. This is not acceptable and will need to be re-designed. The filter drain shown in drawing DR-001 would be located in the 20 m SINC buffer. A swale and an attenuation pond would be considered as above ground naturalised filtration. Flow lines should be added to the drainage diagram to show where the surface water drainage would enter the system.

The topographic survey shown in Appendix A (dated 15th May 2019) does not show any part of the site covered by this application, but only the previously developed site with trees, to the west of this land.

Please let me know if you need any additional information.

Kind regards,

Lisa

Lisa Malter

Ecologist (Mon, Tue, Thu)

Service Delivery - Specialist Services - Environment

Ext.: 8360

Mobile: 07824 354405