

F/22/93315 Cockpit Farm Barn, Knowle lane

Ecology Comments 13/9/22

I object to the development in principle. This site is not allocated for housing within the Local Plan and is allocated as Countryside Gap. Additionally, the site is located within a Priority Biodiversity Link (identified in Eastleigh Borough's Biodiversity Action Plan) and an Ecological Opportunity Area (identified by HBIC). The development will result in an unacceptable loss of habitat, including trees and broad-leaved woodland (a UK BAP Priority Habitat). Development at this location will adversely affect biodiversity and limit ecological enhancement opportunities and contravene Policy DM11 which seeks to protect, conserve and enhance these ecological links, areas and habitats.

However, should the principle of development be deemed appropriate at this site, then the following points need to be addressed and resolved prior to any permission being granted.

Site plan

The red line boundary includes a relatively narrow strip of land to the south of the main site. This is not included on the proposed site layout plan. Proposals for this area of land also must be provided.

Habitat loss and Biodiversity Net Gain

Substantial clearance has taken place on the site prior to the ecological surveys being undertaken. The surveys therefore do not reflect the true pre-development ecological value of the site. A significant area of trees, shrubs and understorey has been cleared which is likely to have provided suitable habitat for a range of species including reptiles, birds, bats, invertebrates, dormice, foraging barn owl and hedgehogs, all which have been recorded nearby. This has resulted in an unacceptable loss of habitat.

In line with Schedule 14 of the Environment Act 2021 (which updates the Town and Country Planning Act 1990), the pre-development biodiversity value for the site is to be taken to be its biodiversity value immediately before carrying out the clearance activities. The Biodiversity Net Gain calculations submitted have used the biodiversity value of the site after the clearance works as the pre-development value for the site and therefore these calculations are incorrect as they undervalue the pre-development biodiversity value of the site. It is anticipated that the revised BNG calculations will demonstrate a biodiversity net loss thus contravening Policy DM11 and the NPPF. The development must deliver a biodiversity net gain.

Enhancements have been proposed on adjacent land to the north of the application area within the blue line boundary. Ecological surveys have not been carried out on this land and therefore the current biodiversity value of this site is unknown. From aerial imagery, the existing habitats present appear to be established with the potential to provide valuable habitat for many species. The works considered to be enhancements therefore could potentially damage existing habitats of good quality and reliant species and result in habitats of poorer quality. If this were to be the case, this would further increase the biodiversity net loss experienced across the whole site as a result of the proposal.

Bat roost potential

The roof of the existing poultry shed has been assessed as having low roost potential for bats. Therefore, a Phase 2 bat survey is required as stated within the PEA. The presence of bats is a material consideration and therefore this survey must be carried out and mitigation agreed (if required) prior to the granting of any planning permission.

Surface water drainage

Information regarding the treatment of surface water or how the scheme complies with policy DM6 has not been provided. Therefore, the changes to the hydrological regime (including water quality, water volumes and direction of flows) cannot be assessed.

With regards to satisfying DM6, the site is approximately 0.75Ha and therefore needs a minimum of two stages of naturalised filtration. However, the site also lies within 100m of a tributary which drains into the River Itchen SAC, therefore a SuDS scheme must include at least three forms of naturalised filtration unless hydrological studies and project-level Habitats Regulations Assessment demonstrate this to be unnecessary to protect the integrity of the SAC and its qualifying features.

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