

Ecology response amended for F/22/94046 49 BISHOPSTOKE ROAD, BISHOPSTOKE,
EASTLEIGH, SO50 6BF

Erection of two-bedroom detached dwelling in garden of existing property

Summer Sharpe

15/12/22

I would like to amend my previous ecology response after discussing this application at the Ecology team meeting.

I object to this application as it is contrary to EBC policy DM 11 and the National Planning Policy Framework paragraph 174 (copied below). It is a requirement for all planning applications to demonstrate biodiversity net gain and no net gain is shown in this application. Due to the extension of the building footprint and the proposed impacts on the trees, this proposal would result in biodiversity net loss. There would be a significant and unacceptable impact on the trees from the proposed pruning. Dead and decaying wood is good for biodiversity as it provides habitat and food for a wide range of wildlife. I object to the extensive pruning of these trees which is proposed to facilitate this development.

The original planning application for 49 Bishopstoke Road was permitted in 1985. It would not have been permitted under current planning legislation. Extending any built development even closer to the River Itchen SAC is not acceptable.

A buffer to the River Itchen SAC (chalk river BAP habitat) is essential to maintain water quality and the integrity of the riparian habitat. The 8 m buffer shown on the plans should be measured from the top of the riverbank but appears to be measured from the water's edge, so it would not be 8 m (and may be closer to 5 m) if measured correctly. The driveway cuts into this buffer zone even further.

The Flood Risk Assessment by UNDA (August 2022) considers the application to be suitable in flood risk terms. The site is located partially within Flood Zones 1, 2 and 3, and is classified as "more vulnerable" (residential). The FRA states that *Post development, the site will become "more vulnerable" (residential) throughout*. Pollutants from the house, driveway and garden could get washed into these protected waters during a flood. The likelihood of flooding will increase due to climate change. The Flood Risk Assessment by UNDA (August 2022) considers the application to be suitable in flood risk terms. The NPPF states that *The assessment should demonstrate to the Local Planning Authority (LPA) and EA how flood risk will be managed now and over the development's lifetime, taking climate change into account, and with regard to the vulnerability of its potential users*. Future occupants of this proposed dwelling will be more vulnerable than the current applicant. There is no justification for additional development on this site.

The only information provided on surface water drainage was *All surface water runoff generated by the proposed development up to 1:100 year rainfall event (plus climate change) will be stored on site, prior to being discharged*. To prevent pollution of the River Itchen SAC we need to determine the level of pollution expected in the surface water drainage, how it is proposed to be stored on site, what volume of water is proposed to be stored, where it is proposed to be discharged, and at what rate is it proposed to be discharged? The discharge rate must not exceed the greenfield runoff rate expected at this site. What is/are the route(s) which would be followed by exceedance flows?

The distance from the rear of the proposed dwelling may only be 5.5 m from the woodland edge to the north of the property. This lowland mixed deciduous woodland priority habitat and development must not be allowed so close to this woodland.

Lisa Malter

Ecologist

DM11 General Approach

1. The Council will work with statutory and voluntary agencies and developers, and will determine planning applications, to: a. protect, conserve and enhance all: i. international, national and local nature conservation designations; and ii. networks of natural habitats and features, including the Local Ecological Network, Priority Biodiversity Areas and Priority Biodiversity Links, watercourses, wetland complexes, woodland trees, and trees and hedgerows important to biodiversity and local character; and facilitate their adaptation to climate change wherever possible;

Buffers

7. Buffers free from development will be provided to designated sites to avoid/mitigate impacts, including recreational impact and impacts on edge habitats, and to maintain dark skies.

NPPF 174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

(a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

(c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

(d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

(e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

(f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.