

Ecology response for F/22/94034 MOORHILL, MOORHILL ROAD, WEST END,
SOUTHAMPTON, SO30 3AY

Proposed 70-bed care home (Use Class C2); associated access, parking, landscaping, sustainable drainage, electricity sub-station, other structures and works; following demolition and clearance of the existing site.

Summer Sharpe

11/1/23

Documents reviewed

DAS by Harris Irwin Architects (P3, October 2022)

Landscape comments by Tim Griffin (November 2022)

Flood Risk and Drainage Strategy by Paul Basham Associates (October 2022)

Bat Survey Report by TetraTech (August 2022)

Biodiversity Net Gain Assessment by TetraTech (October 2022)

Ecology

I object to this proposal because it is contrary to Local Plan policy DM 11 and represents and overdevelopment of the site.

Telegraph Woods SINC is located to the east of the site and West End Covered Reservoir SINC is located to the north. TPO protected trees are located on the southern and western boundaries of the site.

To avoid impact on the Telegraph Woods SINC and the West End Covered Reservoir SINC Eastleigh Borough Council require a 20 m buffer free of all development from the woodland canopy edge of the SINC boundary.

Whilst this appeared to be achievable in the pre-app plans, this proposed building, the bin and cycle stores, garden paths and SuDS features are shown right up to the northern edge of the site, leaving no buffer at all. The eastern end of the site plan shows 2 SuDS infiltration basins and garden paths very close to the site boundary. The SINC buffer zones are not sufficient.

Local Plan policy DM11 states that *Development will not be permitted if it is likely (either individually or in combination with other developments) to have a direct or indirect adverse effect on a Site of Special Scientific Interest (SSSI), Site of Importance for Nature Conservation (SINC) or Local Nature Reserve (LNR) as shown on the policies map (or on a more recent plan*

provided by the Hampshire Biodiversity Information Centre) unless it can be demonstrated that: a. there are no alternative solutions; b. the adverse effects are unavoidable; c. measures are taken to mitigate or, as a last resort, compensate for the adverse effects; d. there is an overall biodiversity net gain; and e. if there are any residual adverse effects which cannot be avoided, mitigated or compensated, the benefits of the development must clearly outweigh the adverse effects on the nature conservation value of the site and any broader impacts on national and local designations, priority habitats, protected and priority species and the local ecological network. This proposal is contrary to DM 11.

The Landscape Illustrative plan for the current proposal also shows several parking spaces under tree canopies along the northern boundary and along the western and southern edges of the proposed car park. This will most certainly in future require excessive works to the trees as they age and the possibility of branches falling on cars increases.

The Bat Survey Report by TetraTech (August 2022) states that two bat activity surveys were done on tree TN31 which is the only tree which has moderate bat roost potential and is proposed to be removed. No bats were recorded roosting at that time. These results will be considered valid until 31 August 2023 after which time additional review will be required. If the tree is to be removed, recommendations for soft felling under ecological supervision were provided in the report. This can be conditioned, however if any signs of bats are found at that time all work must stop and a bat licensed ecologist must be called for advice.

The Biodiversity Net Gain Assessment by TetraTech (October 2022) is based on the current proposal. It will need to be redone after the appropriate SINC buffers have been applied to the development and I will review an amended version at that time.

SuDS

The Flood Risk and Drainage Strategy by Paul Basham Associates (October 2022) proposes the runoff from the building roof shall drain via infiltration through basins 1 and 2 located in the northeast and southeast corners of the site. The roof run-off that is being taken into the southern Basin will flow via lined rain gardens located in the landscaped areas around the southeast corner of the building. Meanwhile, runoff from the carparks and a portion of the building will drain via infiltration crates installed below the carparks.

A catchpit has been specified upstream of the crates to reduce the build-up of silt in the crates and enable infiltration to also take place at the base of the crates.

There is a small portion of the site that is at risk of long-term flooding from surface water, located near to the southern boundary, this can be seen in Figure 6. To mitigate this, a series of shallow filtration trenches (filter drains) have been specified to drain any surface run off which may pond in this area.

The report states that the plot size is approximately 0.72 ha. DM6 states that on *sites of between 0.5 hectares and 1 hectare, SuDS schemes should include at least two forms of naturalised filtration*. Rain gardens and attenuation basins are two forms of naturalised filtration, however the proposed attenuation basins are located within 20 m of the SINC woodland canopy boundary, and must be relocated out of this buffer zone.

The car park and access road are proposed to be drained by permeable block paving and permeable asphalt respectively, with infiltration crates below the car park. Some of the building roof drainage is also proposed to be channelled through the infiltration crates.

There is an area of high flood risk within the site and a series of filter drains are proposed to eliminate ponding in this area. It is not clear from the site plan where these are proposed to be located or where this drainage is discharged from the filter drains.

The CIRIA SuDS pollution mitigation index must be used to demonstrate that the proposed SuDS features provide sufficient pollution mitigation.

The drainage strategy diagram is located in Appendix F on page 18 of the pdf of part 5 of the Flood Risk Assessment and Drainage Strategy with a catchment plan on page 19. This shows drainage from the buildings piped to the attenuation basins. The drainage from the southern side of the building appears to go through rain gardens but the drainage from the northern side of the building is piped directly to the attenuation basin and is not routed through any rain gardens. Exceedance flows on the eastern side of the site would enter Telegraph Woods SINC, which could affect the hydrology of the SINC. This is not acceptable.

Lisa Malter

Ecologist