

RESPONSE TO EBC ECOLOGIST COMMENTS DATED JAN 2023

DESIGNATED SITES (SINC)

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.

The two SINCs located adjacent to the proposed site are designated for the following reasons,

- West End Covered Reservoir – 2D, Grasslands which have become impoverished through inappropriate management, but which retain sufficient elements of relic unimproved grassland to enable recovery and 6A, Sites which support one or more notable species: Green-Winged Orchid *Orchis morio*; and
- Telegraph Woods – 1D, Pasture woodland and wooded commons, not included in any of the above, which are of considerable biological and historical interest and 3B(i): Areas of heathland which are afforested or have succeeded to woodland, if they retain significant remnants of heathland vegetation which would enable their recovery.

It is unclear from the original comment above what impacts from the development the proposed 20 m buffer is necessary to avoid. Further discussions held with Eastleigh Borough Council Ecologist Lisa Malter (23/01/23) confirmed that the principal impact pathways of concern are disturbance and hydrology.

Given the designated features of the two SINCs, significant disturbance is considered unlikely as a result of the proposed development. Neither SINC is designated due to features sensitive to disturbance (e.g., through noise). Neither is accessible (from the site or otherwise) and therefore no disturbance from recreation upon other features, such as fauna which are not part of the designation of the SINCs, could occur during occupation. The only potential source of significant disturbance (although as above the designated features are not sensitive) is construction (including SuDS construction). Significant disturbance during construction can be avoided through the use of suitable control measures secured within a Construction Environmental Management Plan. The methodologies for the control of factors during construction such as dust, noise / vibration and waste can be detailed within such a report and conditioned as part of the application.

With regard to hydrology, the surface water from the site is managed through infiltration ponds which have been designed to control and detain water for a 1 in 100-year flood event (+ 40 % extra capacity for Climate Change). This is above the required standard of control for a 1 in 30-year flood event (whilst also factoring in for climate change) within the site and meets the standard for excessive flows to be prevented from extending off-

site. There are no off-site surface water flow paths and there is therefore no potential for significant runoff from the site or inundation of adjacent habitats.

Therefore, there is no potential for significant effects to occur on the adjacent SINC as a result of disturbance or hydrological changes. We therefore consider the areas of planting which constitute the buffer zones within the site to be sufficient.

BIODIVERSITY NET GAIN (BNG)

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.

We accept the above comment that the BNG assessment of the site would require review and the metric recalculated, should any changes to the layout of the proposed development be required.

BATS

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.

We accept the above comment that current ecological survey data should be reviewed following 31st August 2023 should works to the tree have not been completed. Also, that soft felling is conditioned that if signs of bats are identified that works must stop, and advice sought from a bat licensed ecologist.