

Ecology response for DC/23/94559 Land on the North side of Grange Road, Netley Abbey, Southampton

Discharge of conditions 6 (construction management plan), 7 (levels), 8 (foul drainage), 9 (SUDs drainage) and 15 (Japanese knotweed) of outline planning permission O/16/78014 for residential development of up to 89 no. dwellings with all matters reserved except for access.

RM/19/86186

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Condition 6 CEMP

I have reviewed the Site Wide Elements Plan by Elivia Homes (November 2022) which has a construction method statement written above a construction phase plan. The area to be treated for Japanese knotweed must be shown on this plan. A precautionary working method to include training for site operatives in recognising Japanese knotweed and appropriate actions to be taken must be included in the CEMP. The tree protection fencing line must be adjusted to exclude this area from any access by site operatives and pedestrians to avoid the chance of spreading Japanese knotweed before it is completely eradicated and checked.

Whilst the construction phasing is shown on the plan, there is no information about the phasing of the landscaping and open space or SuDS construction.

There is no information on c) safeguards to be used within the construction process to ensure surface water contains no pollutants on leaving the site; or d) safeguards to waterways adjacent to the site to protect them from pollution impacts. I would expect to see a surface water silt barrier at the northern edge of the site to protect the adjacent SINC on the northern boundary which contains a stream and a silt barrier to prevent any silt from entering the woodland in the north-eastern corner when the attenuation pond is being created.

The section on security lighting states *If additional lighting is required as a security measure then these will be shielded to prevent light spill to neighbours to the south.* This must be amended to include shielding to prevent light shining on any retained vegetation or potential wildlife habitat.

Condition 9 SuDS

It is still not clear that three forms of above ground naturalised filtration have been provided for all of the surface water on site as required by DM 6. The SuDS pollution hazard indices and SuDS mitigation indices in the Ciria SuDS manual (p 568 part E tables 26.2 and 26.3)

must be used to demonstrate that any pollution hazards generated by the development will be mitigated appropriately by this design.

I have reviewed the following documents by Kazys Narbutas Consulting:

Engineering details (Headwall H1, Hydrobrake, Headwalls H3 and H4, Spillway details and plot 32 surface water attenuation details) (Rev A, January 2023), Engineering Details Drainage Layout (Rev C, January 2023).

Is any permeable pavement proposed? The key shows aco drains, domestic surface water drains, several surface water storage and attenuation tanks, block paved carriageway and parking courts and block paved drive and parking construction but no permeable paving mentioned. Two swales, an attenuation basin and a formpave fin drain (to disperse surface water runoff to overland flow through grassed area) are shown on the plan but they each serve different catchments. The function of the formpave fin drain is not very clear, as this catchment seems to be limited to plot 32 but it is also connected to the attenuation basin at headwall H1.

There is a large surface water drain that feeds headwall H2. It collects surface water drainage from the houses and driveways and runs along the roadway. This water would contain pollutants from driveways and the road and is not subject to 3 forms of filtration, it only enters the attenuation basin. The other two catchments each enter a swale at H3 and H4. The swales are each connected to the attenuation basin via slipways.

The attenuation basin does not have any outlets and the Attenuation Pond Sections diagram (Rev B, January 2023) shows that due to the sloping site, the proposed water level could be quite close to the top of the bank at the site boundary. There is a stream just to the north of the northern boundary which feeds into nearby ponds. Due to the slope of the land any overflow from the attenuation pond would enter this stream. How would this be prevented?

Condition 15 Japanese Knotweed

I have reviewed the Site Report and Management Plan for Control and Eradication of Japanese knotweed by Elcot Environmental Ltd (6/10/21 and revised 11/10/2022). A site visit was done on 1/10/2021. There was a stand of Japanese knotweed along the north-eastern boundary which measured at 360 m² visible area and estimated to be 572 m³ below ground (which could vary between 428 to 714 m³). There is no evidence of any treatment having started on site in spite of the warning in section 4.1 that *Untreated and ignored, the Knotweed will continue to grow and spread by underground extension of the rhizome system. (This creates a slow but steady increase in eventual management costs)*. It is likely that if this area remains untreated it will continue to increase in size.

As noted in the report: *Japanese Knotweed is included in Part II of Schedule 9 of the Wildlife & Countryside Act 1981. Section 14 of the Act states that "If a person plants or otherwise causes to grow in the wild any plant which is included in Part II of Schedule 9, he shall be guilty of an offence".* Since section 2.2 states that this site is open to pedestrian access there is a risk that Japanese knotweed could be spread by foot traffic if not properly fenced off. How will this area be protected from pedestrians?

To avoid spreading Japanese knotweed during construction, the treatment will need to be done and monitored before the start of construction in this area. This needs to be shown on a construction phasing plan.

Since this stand of Japanese knotweed is on a site boundary, the neighbouring property will also need to be treated and monitored, with a root barrier installed between the two properties.

The strategy should be amended to include updated dates for the Japanese knotweed treatments (start date, additional treatment dates, monitoring dates), information about the root barrier proposed between this property and the neighbouring property and information about treatment on the neighbouring property.

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