

Additional Ecology response 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

21/3/23

CEMP

I have reviewed the Response to HCC (should be EBC) Comments dated Jan 2023 by Tetrattech written after discussion on 23/1/23. I agree that a site-specific CEMP is required to avoid construction impacts on species and habitats due to noise, dust, vibration, and waste on the adjacent West End Covered Reservoir and Telegraph Woods SINC. Surface water runoff, sediment and pollution control during construction must also be covered by the CEMP. The response from Natural England (by Louise Wyatt on 17/3/23) also recommends that the CEMP also include information on storage of construction materials/chemicals and equipment and prevention of chemical and/or fuel run-off from construction. This can be conditioned.

Surface Water Drainage

The Natural England response on surface water drainage also states that *Step 3 under Section 26.7.1 of the SuDS manual outlines that the requirement for extra treatment should be considered in relation to discharge to environmentally protected sites. It states that 'an additional treatment component (i.e. over and above that required for standard discharges), or other equivalent protection, is required that provides environmental protection in the event of an unexpected pollution event or poor system performance'.*

The HCC Lead Local Flood Authority response from Thomas Callaway 9 February 2023 states that

Infiltration testing has been undertaken on site, showing that infiltration is possible for the surface water drainage strategy. All groundwater level information provided in the submission is from the summer during a drought year, therefore further groundwater monitoring is required in the winter period to confirm that one metre of unsaturated ground will be retained beneath the proposed infiltration features. The surface water drainage strategy relies on permeable paving, crate soakaways and an infiltration basin. Calculations have been provided to show that flooding does not occur for the 1 in 30 and 1 in 100 year storm events plus allowances for climate change. 40% has been used for both storm events however 45% should be considered for the 1 in 100 year event or suitable reasoning should be provided for the

choice of value. The infiltration rate used is slightly high compared with the lowest rate recorded in testing.

Consideration needs to be given to flood exceedance flow routes, runoff treatment through the proposed drainage system (simple index approach) and maintenance requirements for the proposed strategy. **In order for us to provide a substantive response, the following information is required: • Winter groundwater levels, • 45% climate change allowance for the 1 in 100 year storm calculations, • The lowest recorded infiltration rate to be used in the calculations, • Flood exceedance flow routes on a plan, • An assessment of runoff treatment (simple index approach), • SuDS maintenance information.**

The Natural England response also includes the following:

The detailed design of a Sustainable Drainage System (SuDS) should be submitted and agreed with Eastleigh Borough Council. This should include evidence to show that the proposed SuDS scheme will ensure there will be no deterioration in water quality [or changes in water quantity] in discharges from the site. Information on the long term management and maintenance (including funding) of the SuDS for the lifetime of the development should also be secured prior to the commencement of any works.

In conjunction with the concerns expressed by the Countryside Manager, more specific information is required to demonstrate that the ground conditions within the Telegraph Woods SINC would not be affected by water seeping into the ground from the attenuation basin in the proposed location. It must be demonstrated that the soil conditions, vegetation and footpaths in the woodland would not be affected.

Tetra Tech states *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*, however the information requested by the LLFA and Natural England needs to be provided and reviewed before the application can be determined.

Lisa Malter

Ecologist