

Ecology response for F 23 94713 Cockpit Farm Barn, Knowle Lane, Horton Heath

Construction of six dwellings, including landscaping, parking and associated works following demolition and site preparation.

Alex Webb

3/4/23

Documents reviewed:

Preliminary Ecological Appraisal report by Ecosupport (February 2023)

Phase II Bat Survey Report by Ecosupport (July 2022)

Planning Design and Access Statement by NOVA Planning (February 2023)

Ecology response from previous application F/22/93315 (September 2022)

Landscape Strategy Plan by Deacon Design (Rev C, February 2023)

Response:

My colleague Sarah Boyd has objected to the previous proposal F/22/93315 in principle. These relate to any proposed development at this site. The proposals for this application have changed from the previous application, however the principle of development in this location has not changed. I also object to the development in principle.

Our objections are due to the following factors:

This site is not allocated for housing within the Local Plan and is allocated as Countryside Gap.

Additionally, the site is located within a Priority Biodiversity Link (identified in Eastleigh Borough's Biodiversity Action Plan) and an Ecological Opportunity Area (identified by HBIC).

The development will result in an unacceptable loss of habitat, including trees and broad-leaved woodland (a UK BAP Priority Habitat).

Development at this location will adversely affect biodiversity and limit ecological enhancement opportunities and contravene Policy DM11 which seeks to protect, conserve and enhance these ecological links, areas and habitats.

*Substantial clearance has taken place on the site prior to the ecological surveys being undertaken and habitat loss has already occurred. The surveys therefore do not reflect the true pre-development ecological value of the site. A significant area of trees, shrubs and understorey has been cleared which is likely to have provided suitable habitat for a range of species including reptiles, birds, bats, invertebrates, dormice, foraging barn owl and hedgehogs, all which have been recorded nearby. This has resulted in an unacceptable loss of habitat. In line with Schedule 14 of the Environment Act 2021 (which updates the Town and Country Planning Act 1990), **the pre-development biodiversity value***

for the site is to be taken to be its biodiversity value immediately before carrying out the clearance activities.

The Preliminary Ecological Appraisal report identified that the site had high potential for breeding birds, moderate potential for hedgehogs, and low potential for foraging and commuting badgers. The Phase II Bat Survey report identified moderate commuting and foraging activity by multiple bats but no emergences from the building.

If the principle of development is deemed appropriate at this site, the following information would be required:

The entire area of the site as proposed and shown on the landscape plan will need to be surveyed and mapped and the Preliminary Ecological Assessment will need to be done for the entire site. The areas of the Landscape Strategy Plan and the habitat map in the Preliminary Ecological Assessment must be the same. The Phase 1 Habitat Survey map in the current Preliminary Ecological Assessment does not show the full extent of the site to the edge of the property, only the eastern half.

The biodiversity net gain calculations will need to be re-done to reflect the baseline biodiversity of the site before site clearance was done and cover the entire site for this application.

If any exterior lighting is required for security purposes, any lighting used will need to be bat and wildlife sensitive, and follow the latest guidelines.

From the previous ecology response: *Surface water drainage Information regarding the treatment of surface water or how the scheme complies with policy DM6 has not been provided. Therefore, the changes to the hydrological regime (including water quality, water volumes and direction of flows) cannot be assessed. With regards to satisfying DM6, the site is approximately 0.75Ha and therefore needs a minimum of two stages of naturalised filtration. However, the site also lies within 100m of a tributary which drains into the River Itchen SAC, therefore a SuDS scheme must include at least three forms of naturalised filtration unless hydrological studies and project-level Habitats Regulations Assessment demonstrate this to be unnecessary to protect the integrity of the SAC and its qualifying features.*

Although triple stage treatment of surface water drainage is discussed on the landscape plan with several potential drainage features shown on the plan, no specific information has been submitted which explains the proposed treatment train, potential volumes expected, discharge rate off site, path of discharge off site, exceedance flow paths, soil conditions, feasibility of proposed drainage, or the simple index approach for pollution mitigation. All of these issues would need to be addressed in a surface water drainage strategy and plan.

The following information was provided in the PDAS:

5.19 Surface water will be directed initially to a new driveway of permeable surface construction. From here water will be conveyed below surface to the first of two open attenuation basins. A regulated discharge will be made between basins which will be planted with appropriate native species to offer wider biodiversity benefits. From the second basin water will be released to an open swale/ditch where it will then be directed to the existing watercourse to the north. 5.20 The surface water drainage system will be designed to accommodate a 1 in 100 year plus climate change plus

urban creep rainfall event. 5.21 Water butts should be installed to intercept roof water run-off. These will reduce the annual volume of surface water discharge but will not make a material contribution to regulation of critical run-off as these tend to be full during winter months as there is minimal demand for irrigation of domestic gardens in these months. 5.22 In summary source control will be provided by: § Porous Pavement § Domestic rain gardens § SUDS basins and Swales 5.23 The surface water strategy will significantly better the existing run-off regime. There will therefore be no adverse impact on flood flow rates outside of the site. 5.24 The existing site morphology is not going to be materially altered and so there will be no impact on local internal flood flow pathway and exceedance flows will continue to flow in their existing alignment within the site. 5.25 It is envisaged that the detailed drainage scheme can be secured by appropriately worded condition.

The watercourse to the north does not appear to be on or connected to this property. What arrangements would be needed to be able to discharge surface water drainage into this watercourse? It must be shown that a detailed drainage scheme is possible before it can be agreed to condition it. Soil conditions, the height of the existing water table and the slope of the land must also be taken into account to determine whether this is a potentially viable surface water drainage plan. Connecting these features would need to avoid the root protection zones of the existing and retained trees shown on the plan.

A CEMP would be required to ensure that sediment and other pollutants are not allowed to enter the watercourse during construction. The CEMP would also need to include precautionary working methods to protect bats, breeding birds, hedgehogs and badgers during construction.

Lisa Malter

Ecologist