

Our Ref: mk23/02C203425

Your Ref: F/22/93970

31 March 2023

Summer Sharpe
Eastleigh Borough Council
Eastleigh House
Upper Market Street
Eastleigh
SO50 9YN

Dear Summer

Application F/22/93970 for Change of use of land for the siting of touring caravans, motorhomes and tents including a small amenity block and the terracing of the site to accommodate roads, parking and pitches (where appropriate) at Thorneydown Farm, Moorhill Road, West End, Southampton, SO30 3AY

I am writing on behalf of our client, JM Leisure, owner of the land subject to the application F/22/93970. This letter will provide additional information and comments to address the comments received by the statutory consultees and members of the public.

EBC Arboriculturalist

Slight concerns were raised regarding the tree removal on the A27. As explained in our submission the removal of these trees is required so the required visibility can be achieved and the site can be safely accessed. Replacement trees will be planted in a slightly different location further back from the road. Please see the revised **63-06 RevD Illustrative Masterplan** and **63-05 Rev A Landscape Strategy** which also include the approved landscape strategy to the west of the application site showing the trees to be planted further back from the road and, revised **5646-23-B Tree Protection Plan**, all as submitted with this letter.

Concerns were also raised regarding some areas where the level changes may encroach on the construction exclusion zone. We understand that the areas the EBC Arboriculturalist refers to are the areas to the south of pitch 4 (formerly 7) and to the north of pitch 27 (formerly 28). The proposals have now been amended to avoid any level changes encroaching on the construction exclusion zone on these areas. Please see the revised **63-06 RevD Illustrative Masterplan** and **5646-23-B Tree Protection Plan** as referred to above and submitted with this letter.

EBC Ecologist

In their response, the EBC ecologist suggests that biodiversity enhancement recommendations and significant green infrastructure around the site must be strengthened and agreed upon to provide net gain. A **Biodiversity Net Gain Assessment 10571** has been prepared by Phlorum and is submitted with this letter. This demonstrates that our proposals will result in 23.38% net gain in

habitat units and 3,339.02% net gain in linear habitat (hedgerow) units. There is not any national or local policy currently in place which requires a specific net gain but in the pre-application response a 10% gain was requested. We are happy to confirm through our BNG Assessment that our proposals would result in much higher gain than the 10% requested. A biodiversity management and enhancement plan with information on landscaping for the benefit of wildlife can be submitted for the discharge of a relevant condition if/when the application is approved. The concerns raised regarding an external lighting plan not giving an accurate picture of the light levels because campers could also provide their own external lighting can be addressed by a condition restricting the lighting to low level bollard lighting only and even this could be on movement triggers. The concerns regarding the campers' own external light can also be addressed by a condition restricting lighting to below certain luminum levels. Campers would be notified of this requirement when they book a pitch and would have to comply with it as, if required, it could be introduced as one of the park rules.

The applicant is also happy to agree to another condition which, in the event that invasive plants are found on the site, would require their removal before the commencement of the development.

Following the EBC Ecologist advice that the area of the marshy grassland may be a priority habitat and must not be developed or drained, the touring pitch layout has been amended to our proposals to avoid any development or drainage on this area which it is proposed to retain and enhance. Please see revised 63-06 RevD Illustrative Masterplan and Drainage Dwg 2000.0016_103_P3.

The EBC Ecologist also discusses that a touring caravan site in this location would put more recreational pressure on Telegraph SINC and Wildern Local Nature Reserve. However, the holiday makers expected to visit the site are not those who seek a holiday in the countryside as those people would have chosen a more rural location for their holidays. The future visitors are expected to be attending sporting (football, cricket) and cultural (theatre, cinema, concerts, galleries, museums, pubs, restaurants, shopping) events and attractions in the surrounding urban areas. Therefore, we do not consider that they would need to use the Telegraph SINC or Wildern Local Nature Reserve.

Their last comments relate to the drainage of the site, with reference to Policy DM6 which requires three forms of above ground naturalised filtration for the application site, pollutants from vehicle traffic and request further information on water quality, exceedance flow routes, SuDS maintenance and the proposed path of the drainage after it leaves the site. These matters are all addressed in the letter '**Nola Response to EBC Ecologist Comments**' prepared by our drainage consultant, Nola Design and submitted with this letter.

EBC Landscape Officer

The concerns raised by the EBC Landscape Officer have been addressed in the 'Response by Decimus Designs to Landscape Officer's Comments 09.01.23' submitted to the Council on 11th January 2023 and should be now read along with the revised plans and documents submitted with this letter **63-06 RevD Illustrative Masterplan, 63-05 Rev A Landscape Strategy, 63-07 RevA Illustrative Sections, 646-23-B Tree Protection Plan** and **Drainage Dwg 2000.0016_103_P3**.

HCC Highways

The HCC Highways in their response have confirmed that they do not have any objection in principle to our proposals and have requested some additional information to be submitted (visibility splay drawings and arrival information).

The Transport Assessment 02 prepared by Stuart Michael Associates and submitted with the application includes a visibility splay drawing but this has now been updated and submitted separately as **6879-SMA-00-XX-DR-C-000-001 General Arrangement Layout - P04**. The updated plan shows the visibility to the east 54m long and the visibility to the west 99m long which is the agreed visibility for the site when condition 5 of permission F/17/81667 was discharged (DC/21/90985). Please note that the visibility splays 2.4 x 120 m mentioned in the HCC Highways response cannot be achieved but this has been accepted by and agreed with the HCC Highways in the assessment of application DC/21/90985.

If permission is granted, the applicant will enter into a s278 with the HCC and submit more detail drawings as required.

Regarding the arrival information requested, the workshop building approved for the land to the west of the application will be also used as reception for the caravan site. This will be located more than 30m from the site's entrance which means that even in the unlikely event that two or three bookings arrive at the same time they will not need to wait at the street as there would be enough space for all to stop and check-in before they enter the caravan site. If required, it can also be arranged so that each booking would have to select a specific time slot for their arrival.

Finally, the applicant is happy with the required highways related developer contributions (£35,880) and conditions regarding access construction provision, gates set back provision and construction method statement.

Southern Water

The response from Southern Water refers to their guidance regarding stand-off distances from water mains, the need for a formal application for a connection to the public foul sewer and the requirements where a SuDS scheme is to be implemented. The '**Nola Response to Southern Water comments**' prepared by Nola Design and submitted with this letter addresses the water main issues referring to the registered Deed of Easements and the requirements within it, with which the proposals comply, and provides information on long term drainage maintenance.

HCC Flood and Water Management Team

The LLFA in their response have requested evidence that existing surface water flow paths will not be obstructed by the proposed development, evidence that the proposed discharge rate is equivalent to the greenfield rate, detailed calculations to incorporate revised peak rainfall allowances for the 1 in 30 and 1 in 100 year storms, network calculations for all storms in addition to the source control calculations, exceedance flood flow routes on a plan, SuDS maintenance information and water quality information in accordance with the simple index approach. All these issues are addressed on the '**Nola Response to LLFA comments**' which is accompanied by **evidence that the proposed discharge rate is equivalent to the greenfield rate, detailed calculations, Drainage Dwg 2000.0016_103_P3 and Exceedance Flow Routes Dwg2000.0016_110_P1**. The SuDS maintenance and water quality information have been included

within the responses to Southern Water and the EBC Ecologist but to avoid confusion these are also provided in the '**Nola Response to LLFA comments**'.

HCC Waste and Minerals and West End Parish Council

We are glad to see that the Waste and Minerals team as the Minerals Planning Authority agree with the submitted Mineral Assessment Report and do not have any objections to our proposals. In addition, even though not uploaded on the Council's website as a response, we are pleased that our proposals have received unanimous support by the West End Parish Council in their meeting on 1st November 2022.

Members of the public

A few comments from members of the public have also been received. These comments raise various concerns regarding the increased risk of accidents and volume of traffic they expect our client's proposals to generate, the site being a strategic gap, caravans and mobile homes being an eyesore to visitors entering Southampton from the east, allege that the proposed use is not compatible with the surrounding area and that the increased activities will have an impact on local wildlife, increase in noise and pollution.

The proposals have been reviewed by the Highway Authority who have confirmed that there will not be any significant adverse impact on traffic or safety for existing and future users of the surrounding road network. Regarding the site's location within a strategic gap and the proposal's impact, both have been extensively discussed in the planning statement and LVIA submitted with the application and even further on Decimus Design Response to the Landscape Officer's comments. The submitted documents demonstrate that the field does not contribute to the visual separation between settlements as it is completely isolated from any farm/open land by the surrounding urban roads and uses and is too small to be viable for agricultural use alone. Furthermore, due to the existing and proposed screening and the nature of the application it would not result in an unacceptable impact on the landscape character and visual amenity of the local area. The proposals have also been reviewed by the Council's ecologist who has not objected to the scheme. The proposal will not have any adverse impact on ecology and this has been demonstrated in the Ecological Appraisal submitted with the application while the BNG Assessment submitted with this letter demonstrates that the proposal will result in a very high level of biodiversity gain.

I trust that this letter and documents submitted with it provide you with adequate information to give this application a positive consideration. If there is anything else that you may need, please do not hesitate contact me.

Yours sincerely

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For and on behalf of Avison Young (UK) Limited

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