

Ecology response for DC/23/94893 JEWSON LTD, TOYNBEE ROAD, EASTLEIGH, SO50 9DN

Discharge Conditions. Condition 12- Japanese Knotweed Method Statement and Risk Assessment dated 03.02.23. Condition 25 Construction Environment Management Plan March 2023 with Appendix 1 (Site Set Up Plan) & Appendix 2 (Demolition Method Statement). F/21/91686 Construction of 105 dwellings together with access from Toynbee Road, associated parking, public open space and landscaping following the demolition of existing buildings.

Gary Osmond

13/4/23

Condition 12- Japanese Knotweed Method Statement and Risk Assessment

I have reviewed the Method Statement and Risk Assessment by Japanese Knotweed Ltd (February 2023). I don't see where it specifically refers to The Knotweed Code of Practice [Environment Agency, v3 2013] as required by the condition statement. It would be helpful if this could be highlighted within the report.

The site plan shows three areas where remediation works are proposed. JK 1 is fairly straightforward as it is completely contained within this site, however the risk zone for JK2 overlaps into the already built and occupied development to the south and the risk zone for JK3 overlaps into the railway embankment and possibly also the tracks. The previous site knowledge in section 3.2 states *the excavation of JK2a will result in interplay/interference with the knotweed vertical root barrier we previously installed some years ago on the other side of the boundary during the adjacent site development project. JKL understand how and where this was installed to ensure new works are completed correctly to retain integrity to previously installed barriers.*

A similar explanation is required for area JK3 before condition 12 can be discharged. How will this work be accomplished?

There are also 7 patches labelled HT. The report states that *the successful completion of our Horsetail excavation works will be to remove the most heavily infested soils only. On completion of our proposed works the site will still possess some ground infested with Horsetail. We will excavate the surveyed dense areas of Horsetail to remove the most heavily infested soils. Some Horsetail may be present on site in areas outside the surveyed planned excavation extents but to an incidental extent (as a natural plant to the UK). Incidental amounts of Horsetail may naturally be present in soil strips from site for site won material, as a naturally occurring weed in the UK.*

This indicates that horsetail management and monitoring for Japanese knotweed should be included in an invasive species section of the ongoing landscape management plan.

Any Japanese knotweed and horsetail areas must be fenced and marked so that the demolition and construction works do not enter the impact areas until after the eradication programme has been completed, to avoid any spreading of these invasive weeds.

Condition 25 - Construction Environment Management Plan

I have reviewed the Method Statement and Risk Assessment for Demolition by HWM Group (January 2023) and the CEMP by Foreman Homes (March 2023).

The demolition method statement states that *There is one small area with Japanese Knotweed present, at the time of the inspection in December these plants could not be located in the pinpointed area. This requires further confirmation. Any Japanese Knotweed areas must be fenced and marked so that the demolition and construction works do not enter the impact areas until after the eradication programme has been completed, to avoid any spreading of these invasive weeds.*

The site managers must have copies of the plan from the Method Statement and Risk Assessment by Japanese Knotweed Ltd to confirm that no activities will take place in these areas before they are cleared to do so by the project manager from Japanese Knotweed Ltd.

Hearing protection is required by users and operatives in close proximity to the equipment listed on page 24. How will the hearing of householders be protected in adjoining properties? The 300 Kobelco excavator and concrete crusher are expected to generate noise levels up to 103 and 108 dB respectively. The location of the concrete crusher in the middle of the site is as far from housing as possible, however it is not clear that concrete crushing is acceptable this close to an occupied housing development. Dust and noise monitoring points have been shown on p 45, however it states that the details will be submitted to the client at the end of the project. What provision is made to assess whether acceptable levels are exceeded during the works?

The CEMP phasing plan shows housing phases 1-3 and numbers the roads 1-3 but there is no schedule showing the timing of building the roads, housing, landscaping, and open space relative to each other. Material storage is shown on the key, but not on the site set up and phasing plan. Phase 1 housing construction is in the vicinity of Japanese Knotweed area JK2 and Phase 2 housing is in the vicinity of area JK1. Demolition and construction Phasing will need to be adjusted to coincide with completion of Japanese Knotweed treatment and appropriate monitoring to ensure that there is no conflict between the eradication and building works, nor any chance of plant material being spread by construction equipment.

I don't see any specific information in the Demolition method statement or the CEMP about protection of trees and ecology, including prevention of ground water pollution. The section on stockpiles and storage mounds states that these will be sited away from sensitive receptors, but these are not specified or shown on any plan. The locations of plant storage areas and skips are not shown on a plan.

This information is required before condition 25 can be discharged.

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