

Lapstone Playing Fields Enhancements (F/22/94174)

Ecology Consultation

Applicant Response

Dear Sarah,

Many thanks for your consideration of the Lapstone Playing Fields Enhancements application (F/22/94174), for the comments received and the subsequent meeting held on 25/01/23 to discuss further.

Please see below the applicants responses to the comments made.

Consultee comment: The proposals will result in the culverting of 44 metres of a watercourse (as stated by the applicant, however it appears to be closer to 60m on OS maps) resulting in the loss of open watercourse and associated wet woodland habitat (a priority habitat) with a significant number of trees, approx. 30 years in age, predominantly goat willow (covering an area approx. 800-900m²) being removed. This is also suitable habitat for great crested newts, dormice and other small mammals which are recorded in proximity and for reptiles.

Applicant Response: The applicant maintains that the proposals will result in culverting 44m of drainage ditch. Please see figure 1 below which demonstrates this. Fair Oak & Horton Heath Parish Council have confirmed that this culvert and drainage ditch was created in 1999 when the playing fields were constructed. Accordingly the habitat and associated trees are a maximum of 24years old.



Figure 1: Length of culvert to be extended

In the meeting on 25th January, we discussed how best to quantify the wet woodland habitat area being lost to help quantify the mitigation measures required and associated BNG calculations. Please see Figures 2, 3 and 4 below which demonstrate the square metreage of:

1. The watercourse to be culverted (Figure 2)
2. Perimeter area of trees - trunks (Figure 3)
3. Perimeter area of trees - canopy (Figure 4)



Figure 2: Square meterage of watercourse to be culverted (99.57m²)



Figure 3: Square meterage of trees - trunks (391.70m²)



Figure 4: Square meterage of trees - canopy (866.93m²)

These calculations have been measured and verified on site. For the purposes of the BNG calculations, in the first instance, the greatest measure has been used – the square meterage of the tree canopy, but when considering the mitigation requirement and in particular the extent of replacement watercourse, acknowledgment should be made for the fact the watercourse itself within the ditch is 99m² and that the area of trees from their trunks is 391m². Any new planting should therefore be considered against the square meterage of the trunk, acknowledging that it will establish over time and the canopy extend as a result. Following your email on 16/05/23, we understand that this is accommodated for the Defra BNG metric.

Habitat Surveys have been undertaken and shown there to be no dormice or Great Crested Newts (GCN's) present within the culvert and that the boundary habitat being retained provided much better habitat for these species. While these species aren't present, the project ecologist has recommended as best practice, that EPS Licences are sought prior to the removal of this vegetation

due to the proximity of these species at Quobleigh Pond (GCN) and in the hedgerow to the northern boundary of the site (suspected dormice).

Consultee Comment: Culverting of watercourses results in the loss of the open channel, associated habitats and wildlife corridor. Please note, Hampshire County Council's ordinary watercourse policy states that consent will not normally be given to build a culvert that a watercourse can flow through. Consent from HCC will be required prior to any development commencing on the watercourse.

Applicant Response: HCC as the LLFA responded to the application on 19/01/23 with the following: *"Thank you for consulting us on this application. Due to the minimal increase in impermeable area, the LLFA has no comments regarding surface water drainage. The proposal for land drainage may require additional outfalls that may need ordinary watercourse consent from the LLFA in addition to any planning permission."*

The applicant has undertaken a pre-app consultation with the LLFA and recently submitted an application for an Ordinary Watercourse Consent (OWC) to extend the culvert by 44m. This application is currently pending but it is acknowledged that the proposals are dependent on an OWC consent in order to be delivered.

Consultee Comment: Wet woodland is a UK BAP priority habitat. Wet woodland combines elements of many other ecosystems and as such is important for many taxa. The high humidity favours bryophyte growth. The number of invertebrates associated with willows and birch, is very large. The association of dead wood with water provides specialised habitats not found in dry woodland types.

Applicant Response: Whilst the comments are noted, the project arborist and project ecologist have both noted that relatively young age of this man-made drainage pitch and the later established surrounding trees means there is very little dead wood present, with the goat willow of a very similar age. The habitat has therefore been classified as poor which was agreed as an accurate classification in the meeting held on 25/01/23.

Consultee Comment: The applicant has stated that the layout of the site cannot be successfully modified in a way which both avoids the culverting of the watercourse and loss of associated woodland and still accommodates a second cricket pitch. It is also my understanding that alternative locations for an additional cricket pitch have not been identified. Ultimately, the Councillors will need to decide if the provision of a second cricket pitch at this location takes precedent over the environmental protection policies.

Applicant Response: This is correct, unfortunately the project cannot be delivered to deliver the necessary outcome without the removal of this area of goat willow and the extension of the culvert to create the outfield for the cricket pitch. England & Wales Cricket Board (ECB) guidelines for cricket pitch dimensions require a minimum boundary radius of 45.72m (50 yards) from the pitch, with a 3m safety run off from the boundary edge. The ECB also requires that where 2 pitches are adjacent to each other, a 30m gap is retained between the 2 boundary edges to remove the ball trajectory risk. Two attempts at providing a design alternative which delivers the 2 pitches whilst avoiding this existing drainage ditch and the associated vegetation are demonstrated below. These show that the pitches cannot be delivered without the boundaries touching or overlapping, let alone factoring in the safety run off and requirement for a 30m gap between pitch boundaries.



The provision of a second cricket wicket has been a long standing aspiration to meet the ever growing demand for cricket in the area and with Fair Oak Cricket Club in particular – as identified in Eastleigh Playing Pitch Strategy (PPS). The proposal looks to maximize the use of the existing playing fields, utilizing the existing ancillary provision (4 changing room pavilion, groundsman shed, car parking, services etc) already in place to support the use of the new pitches. The alternative to this approach would be to find a new greenfield site to deliver 2 cricket wickets and the associated ancillary requirements including a new 4 changing cricket pavilion, practice facilities and car parking. No appropriate available site has been identified which could accommodate this but in addition, it is felt that this alternative would have a more significant environmental and ecological impact than the proposals being presented, which utilize existing recreational playing fields to deliver this longstanding and strategically important objective, without delivering on more greenfield land. Whilst retention of existing habitat is always preferred, it is hoped that the application demonstrates that no suitable alternative design is viable to deliver the scheme (Policy DM11 (a)), and suitable ecological compensation will be delivered as part of the scheme to mitigate for the existing habitat being lost, with >10% BNG demonstrated.

Biodiversity Net Gain

Consultee Comment: Should the scheme be supported, sufficient ecological compensation will need to be approved prior to determination. The proposals do not currently demonstrate this. The applicant has stated that a 10% Biodiversity Net Gain will be provided. However, BNG calculations (using the DEFRA 3.1 metric) have not been submitted. A suitably qualified ecologist will need to calculate this for the whole of the application site and show how it relates to the enhancement plan (Figure 5, Ecological Appraisal Report, November 2022).

Within these calculations, the area of replacement wet woodland habitat must at least equal that being lost. The plans appear to be providing about half the area of that being lost (440m² in the SW corner of the site). The time to achieve the target condition of the created wet woodland, compared to the age/ condition of that being lost, is taken into account within the calculations. The calculations may determine that a larger area of wet woodland creation is favoured. Rotating the football pitch 90° to a north-south alignment, as discussed on site, would provide more space to accommodate a larger wet woodland area.

The replacement wet woodland planting also provides compensation for the loss of GCN and dormouse habitat along the watercourse to be culverted.

Applicant Response: Please refer to earlier applicant response which provides accurate measures of the area to be removed. The applicant notes that since the time of the response, the Defra 4.0 metric has superseded the 3.1 metric, which has made the achievement criteria for the replacement for the wet woodland habitat more arduous to achieve. Accordingly, plans have been amended, with the full size football pitch rotated 90 degrees to a north-south alignment to create more space for the creation of replacement wet woodland habitat totalling 1150m². This area will be exponentially bigger than this once the associated planting has established.

Please see submitted Defra 4.0 metric calculations provided, which substantiate the ecological mitigation being provided and demonstrate a BNG of 12.31%. Updated plans are also provided to demonstrate the revised pitch layout to accommodate the greater wet woodland replacement habitat.

Drainage

Consultee Comment: Plan *Existing Primary Drainage System_Lapstone* is referred to in the DAS but I cannot find this plan.

It is not clear on the proposed drainage plan where the water will be coming from to supply the wet woodland compensation area in the south-west of the site. It is understood that the drainage from the football pitch (and possibly other areas of the playing field) will be directed to this area. This needs to be shown and demonstrated that a sufficient amount of water will reach this wetland habitat.

Any excavation associated with the drainage and wetland creation will have to be away from existing trees and their RPAs. This will also protect the Wyvern Technology College Meadow SINC which is adjacent to the site at the southern half of the site's western boundary

Applicant Response: Please see attached existing drainage design for reference. The 'wetland area' will be created by connecting into the existing collector pipe that runs south to north and discharges

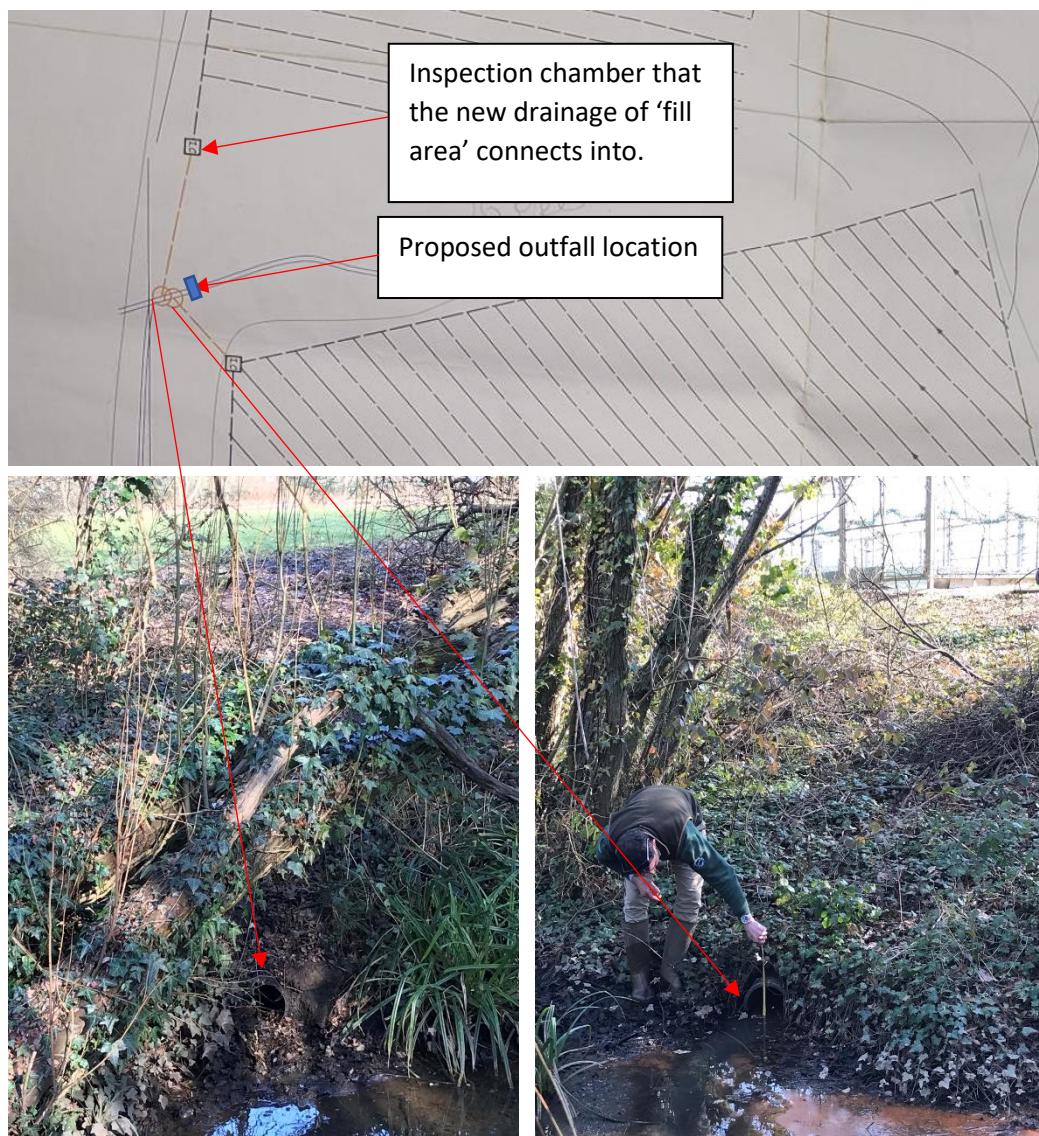
into existing drainage ditch. Whilst relatively flat, the topography of the site does also fall this way, meaning surface water will also naturally travel and collect in this direction.

The replacement 'wetland area' has deliberately been offset to ensure it avoids the RPA's of existing trees.

Culvert

Consultee Comment: The drainage proposals show details of the collector pipes for the drainage of the pitches. However, I cannot find details regarding the proposed dimensions of the culvert and how this interacts with the drainage of the playing fields. I cannot see a response from the Flood and Water Team at HCC but I would encourage a response from them regarding their requirements for this.

Applicant Response: The existing culvert is a 600mm concrete pipe, however the level of flow observed from it in a variety of weather conditions is minimal. This will be extended to the same diameter, 44m to the new outfall location. The proposed additional pitch drainage will connect into the existing primary drainage system, which discharges into the drainage ditch, downstream of the proposed outfall location following extension of the culvert and will therefore not be affected. Please see images below annotated with the existing drainage system to demonstrate this.



The applicant can confirm that the water discharging into this watercourse will remain consistent with the existing catchment area and the flow rates will remain within greenfield run off rates. The culvert discharge point will just be 44-45m further downstream (west). The proposals should therefore be neutral to the existing arrangement with regards to flood risk.

HCC as the LLFA responded to the application on 19/01/23 with the following: *“Thank you for consulting us on this application. Due to the minimal increase in impermeable area, the LLFA has no comments regarding surface water drainage. The proposal for land drainage may require additional outfalls that may need ordinary watercourse consent from the LLFA in addition to any planning permission.”*

An application for ordinary watercourse consent is currently pending, which provides detailed design information for the construction of the extended culvert for the LLFA to consider.

Landscape Management Plan

Consultee Comment: Section 2.1 refers to a proposed hedge shown on plan LS1 within the document. Plan LS1 shows two hedgerows with new planting; one at the north (presumably this is supplementary planting to the existing hedge – the hedge is identified in the Ecological Appraisal Report) and one at the east of the site (presumably a new hedge).

Neither of these hedgerow proposals are shown on the mitigation and enhancement plan in the Ecological Appraisal Report. These should be included in the BNG calculations.

Any other mitigation proposals shown on plan LS1 or elsewhere in the Landscape Management Plan should be included in the BNG calculations. These proposals should be agreed with the project ecologist who should carry out the calculations.

Applicant Response: Please see updated Landscape mitigation plan. Amendments have been made to the proposed hedge planting on the Eastern boundary due to resident objections in the adjacent properties at Daisy Fields. The applicant can confirm that the project ecologist has now included all new proposed planting in the BNG calculations.

Other Potential Habitat Loss

Consultee Comment: The pre-application stated that there will be loss of habitat at the north of the western boundary, although the extent was not specified, to provide clearance for the playing area (dormice recorded in this area). It was additionally stated that there may be crown raising of trees to 2m (max) along the western boundary for ball retrieval (trees with bat roost potential in this area). Please can the applicant confirm if this is still proposed or if any other additional habitat loss is proposed elsewhere on site and provide further details. Any further losses will need to be included in the BNG calculations.

Applicant Response: The applicant can confirm that no additional habitat loss is proposed as part of the scheme. There is no proposed loss of vegetation to the north of the western boundary and no crown raising of trees along the western perimeter is proposed either, with the retractable netting providing the necessary protection from balls entering the western boundary. The relevant section of the AMS (4.4) which incorrectly made this assertion, has been amended accordingly and is resubmitted for reference.

Other points:

Consultee Comment: No additional lighting (temporary or permanent) is proposed.

I believe the netting is to be put away when not in use. Please can this be confirmed.

A detailed CEMP and LEMP are required. The Landscape Management Plan could be revised to accommodate the latter.

Nutrients – The land use of the site is not changing. Is there proposed to be a change in the amount of fertiliser used to maintain the sports fields? Good soil management should be considered here as a starting point to maintain healthy soils and thus reduce the need for chemical fertilisers.

Applicant Response: The applicant confirms that no additional lighting is proposed (temporary or permanent).

It is correct that the proposed netting is retractable and therefore only erected during use of the cricket pitches – usually Saturdays and Sundays from May – August each year. The applicant would consider it appropriate for this to be conditioned if felt appropriate.

As stated above, the CEMP has been commissioned and has been issued following comments received.

The applicant can confirm that the change in use of the sports fields will not increase the amount of fertiliser being used to maintain the sports fields.
