

Ecology response for F/23/95474 30 VALLEY ROAD, CHANDLER'S FORD, EASTLEIGH, SO53 1GP

Erection of 3no. detached two storey dwellings following demolition of existing dwelling and detached garage.

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1/8/23

Ecology

There are records of slow worms, bats, swifts, stag beetles and hedgehogs near this site.

I have reviewed the Ecological Appraisal Report by Hampshire Ecological Services (April 2023). The Tree Report by Arbor-Eco (May 2022) mentions the presence of a badger sett in section 1.3. This was not mentioned in the Ecological Appraisal and must be clarified.

I object to this application on the grounds that it would be an overdevelopment of this site and with the removal of the woodland area would result in biodiversity net loss, contrary to local policy DM11 and national planning policy.

The house and garage have been assessed as having low bat roost suitability and will each need at least one bat activity survey. All the trees and shrubs have been assessed as having the potential to support nesting birds. Reptile surveys are required to determine whether reptiles are using the suitable habitat identified on site. This information is required before determination as the presence of protected species is a material consideration.

The applicant must be reminded of the seasonality of survey work, which also depends on suitable temperature and weather conditions.

Phase 2 bat emergence/re-entry surveys can be done from May through September. If the required survey is not done by the end of September, it will need to wait until next May. If bats are seen emerging on this survey, two additional surveys (at least 2 weeks apart) will be required to inform a mitigation license application.

Reptile survey mats need a few weeks to bed in and then 7 survey visits are required. Reptile survey season is April through September but avoiding the hottest months.

Nesting bird season: March through August, vegetation should be removed outside nesting bird season if possible. If this is not possible then it must *be inspected (by an ecologist) for nests immediately prior to removal of the vegetation or demolition of the buildings. If any active nests are found during the works, a 5m buffer zone should be established around it and be temporarily fenced off to prevent plant or personnel disturbing the nest until the end of the breeding bird season (or until the nest is no longer in use). Any active nests found within the buildings must be retained and work must be delayed in that area until the young have fledged and left the nest.*

Any closed board fencing needs hedgehog holes in the baseboards (13 x 13 cm minimum) to allow free movement of hedgehogs through the gardens.

The biodiversity enhancements proposed in the report include an integrated (built-in) bat brick in at least one dwelling and a bat box on a suitable mature tree before the commencement of works. I would consider these as mitigation for loss of the potential bat roost features in the existing house rather than biodiversity enhancements.

The built in swift nest boxes/ bricks or other externally mounted bird boxes would be good biodiversity enhancements for this site.

Surface water drainage

The Flood Risk Assessment report shows a photo of a stream visible at the rear of the site behind 34 Valley Road. This appears to be culverted and crosses the corner of the site, however in 6.01 it states that the culverted stream lies outside the ownership of the applicant. This must be clarified.

On our map, this culverted stream is marked EA main river and is a tributary of the Monks Brook which is a tributary of the River Itchen.

As required by DM6, a CEMP must be submitted before determination to ensure that the watercourse is protected from pollution during construction.

The FRA does not explain the proposed surface water drainage strategy or how it would meet the requirements of DM6. The surface water drainage/SuDS plan with naturalised filtration within the treatment train must be submitted before determination to ensure that it is feasible on this site. Both attenuation and pollution protection measures must be included. If soakaways are proposed this must be supported either with evidence of working soakaways for the existing house or infiltration test results. Soakaways must be located at least 5 m from any built structure. It is not clear that this is possible with the 3 houses proposed on this site. Section 6.1 in the FRA states that the driveway will be finished using permeable block paving as part of a SuDS design, but the whole surface water drainage strategy must be planned and integrated into the proposal from the start, not as an add-on feature.

The site photos in the Ecological Appraisal Report show that the site is not level. Section 1.2 in the Tree Report by Arbor-Eco (May 2022) mentions that the topography is *undulating with terracing at between 1 m and 2 m above the ground level of the property. The neighbouring properties were within land approximately 3 m below that of the existing levels of the site.*

The retaining walls proposed in the site plan will affect the surface water drainage and overland flows and must be considered in the drainage strategy. Exceedance flood routes must also be shown on the surface water drainage plan.

Although foul drainage is not assessed by the ecology team, this statement in 6.02 causes concern: *Clearly, there will be disruption to mains drainage during a major flood event causing sanitation issues.* This becomes a surface water pollution issue because any sanitation issues on site could enter the culverted stream and cause pollution to enter the waters of the Monks Brook and therefore the River Itchen. This is not acceptable.