

LAND AND DEVELOPMENT ADVISORY

Ageas Bowl Mixed Use Development: Response to Ecological Queries Raised

1 BACKGROUND

1.1 INTRODUCTION

Planning Application F/22/93194 for a mixed-use development at the Ageas Bowl, Hampshire (the Proposed Development), was submitted to Eastleigh Borough Council (EBC) in 2022. This was supported by an Ecological Impact Assessment (EclA) prepared by Johns Associates, which included a series of detailed appendices containing supplementary information. A period of detailed engagement with EBC, the Design Panel and other statutory consultees including Natural England was progressed throughout 2023. This allowed the opportunity to re-evaluate certain elements of the Proposed Development, modify the design to avoid, reduce and mitigate likely negative effects on ecology and maximise the positive ecological benefits and opportunities presented from the Proposed Development. It therefore allowed the opportunity to respond to requests for further information, clarification and explore and resolve concerns highlighted.

This document sets out each of the individual comments received from Eastleigh Borough Council and Natural England, and provides a suitable response to each of them, which includes explanatory text, revised details, drawings and in some cases supplementary technical notes, which are contained in the Annexes to this document.

1.2 UPDATED ECOLOGY AND LANDSCAPE OPPORTUNITIES AND STRATEGY

The Proposed Development will provide an integrated landscape and habitat framework across the Site that is well connected with the Green and Blue Infrastructure of the wider area eg improved access to Telegraph Woods and extending, diversifying and rehabilitating Telegraph Brook within the Site to providing improvements to biodiversity and water quality.

These connections have influenced important considerations to assist in integrating the Proposed Development within its immediate and wider landscape and ecological/habitat setting and context.

By carrying out an Ecological Impact Assessment (previously submitted), Landscape and Visual Baseline Appraisal and the detailed consultation with EBC in particular, the key issues regarding integrating the proposals into the local landscape and ecological context have been understood, have been carefully considered and the design changed to resolve them as far as possible, mitigating and compensating where this is not possible. In addition, enhancements and a Biodiversity Net Gain has been delivered.

The most effective method of introducing a development into the landscape to minimise potential impact is through its careful siting or configuration and consideration of a range of mitigation and enhancement measures as an integral part of the development.

A robust ecology and landscape strategy has been developed as an integral part of the Proposed Development that responds positively to the local biodiversity, landscape character area of the Site and its ecological setting and includes a comprehensive range of proposed measures to achieve this including:

- The careful integration and arrangement of the Proposed Development within the existing landscape framework of the Site including the retention of existing trees and woodland along the Site boundaries wherever possible;
- New native tree and scrub structure planting within the Site and across the wider Boundary Lakes Golf Course;
- Ornamental tree and shrub planting with ecological value (that supports pollinators);
- New amenity and meadow grass areas;
- New or modified ponds / drainage features (associated with the Telegraph Brook);
- A site-wide SuDS strategy with permeable paving / planted and managed water storage systems used throughout and the enhancement of an existing drainage channel to achieve three forms of natural filtration;
- Ecological features such as habitat piles, log piles, hibernacula, and bird/bat boxes;
- Amenity spaces and features such as benches / seats / play equipment;
- Coordinated access and circulation strategy including new or enhanced footpath / cycle routes;
- Green roofs on buildings and structures where appropriate.

Collectively, this approach will deliver a high quality and integrated ecology and landscape framework for the Proposed Development and provide wider off-site benefits and an overall Biodiversity Net Gain.

1.3 ABOUT THIS DOCUMENT

The remainder of this document sets out:

- Section 2: Queries raised by EBC and associated responses.
- Section 3: Queries raised by Natural England and associated responses.
- Annex A: Biodiversity Net Gain Report (the Defra Metric is supplied as a separate Excel workbook ref: Ageas Bowl Mixed Use Development BNG 01/12/23).
- Annex B: Updated Landscape/Habitat Plans.

2 EASTLEIGH BOROUGH COUNCIL: QUERIES AND REQUEST FOR FURTHER INFORMATION

1.4 INAPPROPRIATE GROUND LEVELS, LAND SLIP/ GROUND INSTABILITY AND DRAINAGE ISSUES DUE TO SITE LEVELS

EBC Query 1.1
At a recent site visit it was noted that the site levels vary greatly with tall embankments along the northern and western boundaries. Along the residential areas this would result in either very steeply sloping or terraced gardens, potential land slip and potential drainage issues. The gardens of houses in area F would be in a very steeply sloping area. What safety measures are proposed to keep the soil in place and away from the tree line at this boundary? Soil erosion due to steep gradients will affect any vegetation in this area as well as the root protection zones of trees where soil could either erode away or add onto the existing levels.
Response
<i>The scheme design has changed significantly since these comments has been received. Please refer to the separate Calderpeel sections that have been produced to demonstrate how these level changes (split levels) and land stability (and retaining structures) have been addressed. This also avoids impacts on retained trees.</i>
EBC Query 1.2
The tree line at the site boundary would be subject to increased shading from the development and any fencing/enclosure. There is inadequate retention of a suitable wildlife habitat corridor around the perimeter of the site.
Response
<i>The scheme design has changed significantly since these comments have been received. The development has evolved to accommodate a minimum offset buffer of 20m from Telegraph Woods in most locations. The site perimeter includes 20m buffer to Telegraph Woods in most locations and this is shown on the current suite of landscape drawings. As a result the development (including fencing/enclosure) have also been moved further away from Telegraph Woods thereby avoiding these potential effects.</i>
EBC Query 1.3
Long sections through the plans are required to show the site levels and how the development proposes to deal with this.
Response
<i>The scheme design has changed significantly since these comments has been received. Please refer to the separate Calderpeel sections that have been produced to demonstrate how these level changes (split levels) and land stability (and retaining structures) have been addressed.</i>
EBC Query 1.4
There is a large bund on the north-western boundary. The landscape plan refers to strategic/structural landscape zones in this area. More details are required. Given the large level changes in this area what is being done to keep soil from affecting the shared path?
Response
<i>The scheme design has changed significantly since these comments has been received. Please refer to the separate Calderpeel sections that have been produced to demonstrate how these level changes (split levels) and land stability (and retaining structures) have been addressed. As a result of providing the revised buffer to Telegraph Woods, there is minimal intervention required in this zone and a dedicated new access route through to Telegraph Road is now being proposed in response to requests from EBC for this facility.</i>

<i>EBC Query 1.5</i>
What measures are proposed to keep the soil in place along the Telegraph Woods SINC boundary? Landslips into Telegraph Woods could block the watercourse culvert, and cause damage to trees and ground flora. Sedimentation from eroded soil entering the watercourse can cause additional problems for aquatic organisms and the ecology of downstream areas.
<i>Response</i>
<i>The scheme design has changed significantly since these comments has been received. Please refer to the separate Calderpeel sections that have been produced to demonstrate how these level changes (split levels) and land stability (and retaining structures) have been addressed. As a result of providing the revised buffer to Telegraph Woods, there is minimal intervention required in this zone and a dedicated access route through to Telegraph Road is now being proposed. The embankment is vegetated, but the planting and landscape management proposals will include further planting provision to support long term stability to also prevent soil erosion/transport to the base of the slope where the culvert entrance is located.</i>
<i>EBC Query 1.6</i>
The landscape plan for area 5 refers to a retaining structure to access road. More details are required for construction to avoid impacts and sedimentation in this ecologically sensitive area where Telegraph Brook leaves Telegraph Woods.
<i>Response</i>
<i>The scheme design has changed significantly since these comments have been received. This feature has now been designed out of the scheme and therefore does not require any further consideration.</i>
<i>EBC Query 1.7</i>
Due to past permissions, the Telegraph Brook watercourse is now buried very deeply below the made ground around the Ageas Bowl. This makes de-culverting the watercourse much less feasible. We strongly encourage the applicant to re-assess whether there is any scope to reduce ground levels across the site in the vicinity of the culverted watercourse with an aim to restore the natural watercourse partially or in full.
<i>Response</i>
<i>Then opportunity to undertake this has been reviewed by the drainage consultants (both current and historically). The option to remove the culvert and replace it with an open channel has been ruled out due to significant level changes between the surface levels and those of the culvert, which also would require a very large cross section, very steep sides and un-naturally deep form. Please refer to the separate documentation provided by Sustain Environmental. This option has been previously explored and discounted (pre 2012) as part of a previous planning application for an irrigation lagoon in the same location (never implemented) which proved to result in greater impacts and safety issued than the benefits envisaged. A new open channel leading away from Telegraph Woods, new wetland areas, retained/enhanced existing channel by the residential area and rehabilitated channel leading to the lakes/car park are proposed within the scheme and can be seen on the landscape drawings and post development BNG plans prepared by Johns Associates.</i>

1.5 EXCESSIVE HABITAT LOSS AND EXPLANATION OF BIODIVERSITY NET GAIN CALCULATIONS IS NOT SUFFICIENT

<i>EBC Query 1.8</i>
We do not see how this scheme delivers a biodiversity net gain, let alone a 37% net gain as stated.
<i>Response</i>
<i>A separate and updated BNG Technical Note has been prepared by Johns Associates (and can be found in Annex A), based on updated habitat/condition assessments carried out in the summer of 2023 and the final development design. In summary the Proposed Development provides a BNG of 19.08 % total net increase in habitat units and a 161.59% total net increase in hedgerow units. There is no loss of watercourse length. The</i>

existing Telegraph Brook channel will be rehabilitated and naturalised, and a new section of open channel and wetlands created in the residential zone, resulting in a net gain of open watercourse and wetland habitat.

EBC Query 1.9

The EclA appendix B UK Habitat Classification Survey Technical Note provides maps of the UK Hab areas before and after the proposed development. The biodiversity net gain calculations state that there will be a positive 37.14% total net increase in habitat units and a 114.48% total net increase of hedgerow units. Table 4.3 states that 0.416 km (1.03 units) of other rivers and streams is lost and table 4.6 states that 0.171 km (0.43 units) of other rivers and streams are created. The summary, section 5 states that there is a negative - 35.20% total net loss in river units. Where is this loss? This is not acceptable. EBC has an anti-culverting policy (within DM6).

Response

There is no loss of existing watercourses. The existing watercourse will not be culverted. Its current open length along the boundary with David Lloyd will be enhanced and rehabilitated. The current artificial re-sectioned/realigned and reinforced sleeper lined channel running through Westwood Copse and out to the golf course will be enhanced and rehabilitated. In addition, a new section of open channel is proposed, together with other and more diverse wetland areas within the main residential area. Overall substantial benefits are planned for the surface water environment within the Proposed Development. A separate and updated BNG Technical Note has been prepared by Johns Associates (and can be found in Annex A), based on updated habitat/condition assessments carried out in the summer of 2023 and the final development design. In summary the Proposed Development provides a BNG of 19.08 % total net increase in habitat units and a 161.59% total net increase in hedgerow units.

Proposed planting strategy for the open channels and wetland areas will include species-rich grassland for seasonally wet/dry habitat, marginal and aquatic species.

Proposed planting to include wildflower / grass seeding as well as plug plants.

Wildflower and grass seed mix for occasionally damp areas eg Emorsgate EM8 Meadow Mixture for Wetlands sown at 40Kg/Ha. Mix contains 26 species of wildflowers and grasses.

Typical Mix of Plug Planted Marginal Species:

- *Alisma plantago*
- *Caltha palustris*
- *Carex acuta*
- *Iris pseudacorus*
- *Juncus effusus*
- *Lythrum salicaria*
- *Mentha aquatica*
- *Myosotis scorpioides*
- *Phragmites australis*
- *Ranunculus flammula*
- *Typha minima*
- *Veronica beccabunga*

Pre-planted (with the mix listed above) coir pallets will be installed around the marginal areas of the lakes within the Proposed Development. In addition, pre-planted vegetated floating islands will be installed in each of the lakes to further diversity the habitat structure and function within the lakes (currently lined and no vegetation) and improve its ecosystem diversity and function (notably for zooplankton, invertebrates, and plants).

<i>EBC Query 1.10</i>
Domestic gardens cannot be included in the biodiversity net gain calculations as once a homeowner has taken possession of the property, they can change the vegetation or remove it completely. It would be helpful to have a map just showing the areas where habitat would increase. Although I can see the hedgerows on the plan, they do not appear to be continuous linear features so their usefulness as wildlife habitat may be limited.
<i>Response</i>
<i>The scheme design has changed significantly since these comments have been received. A separate and updated BNG Technical Note has been prepared by Johns Associates (and can be found in Annex A), based on updated habitat/condition assessments carried out in the summer of 2023 and the final development design. In summary the Proposed Development provides a BNG of 19.08 % total net increase in habitat units and a 161.59% total net increase in hedgerow units.</i>
<i>EBC Query 1.11</i>
Westwood Copse in the north-western corner of the site near the entrance, is currently an area of deciduous woodland containing mature sweet chestnut trees and hazel coppice stools. This was confirmed on a site visit on 4/10/2022, LM, SB, and CS). On the UKHab map (ref J00765-004, 11/2/2022) it is shown as part of a larger parcel of woodland classified as w1h6, other woodland mixed, mainly conifer. Table 4.1 Baseline Habitats lists this as being in poor condition, but I think this needs to be re-assessed, with the copse and woodland along the northern boundary assessed separately from the conifers around the existing parking area to the north of the site access road.
<i>Response</i>
<i>The scheme design has changed significantly since these comments have been received. A greater proportion of this area is now retained within the new masterplan/layout. Notwithstanding this, there still remains some loss and a new BNG assessment based on updated condition surveys has been completed. The reviewed condition of Westwood Copse has been taken into account in the updated BNG calculations.</i>
<i>EBC Query 1.12</i>
The proposed UKHabs plan shows a significant area of this woodland is proposed to be removed to accommodate the development. The established woodland along the perimeter of the site has ecological value, it is not just a series of individual trees. It contains mature trees, a shrub layer, a well-developed understorey, and soil with structure, associated microbes and fungi. It should be enhanced rather than removed. Woodland habitat loss is unacceptable.
<i>Response</i>
<i>The scheme design has changed significantly since these comments have been received. A greater proportion of this area is now retained within the new masterplan/layout with a minimal loss of trees now achieved. Notwithstanding this, there remains some loss of woodland although this focuses on an area of conifer plantation, managed planted shrubs (including certain non-native species such as snowberry and a small number of Category B and C trees (oak, ash and sweet chestnut species) that are associated with the existing pedestrian path and its adjacent disturbed ground, alongside more developed areas of the Copse and being adjacent to Moorhill Road. A summary of the trees removed from this location is tabulated and also shown on the plan below (taken from the Arboricultural Method Statement (Mulberry Consultants, 2023). There are no Category A trees associated with those requiring removal. A small number e.g. T1, T8 and T24 and T25 contribute to the ecological character of the already modified Copse through their size and age, the remainder provide no more than a moderate contribution due to their size, age, structure, condition and location close to the existing built structures including the adjacent paths, roads and service runs. Whilst this is regrettable, these trees were shown to be removed in the previous plans and the overall outcome of the revisions is to retain an enclosed character and a significant increase retention of trees and woodland. Substantial new areas of woodland and structure planting are included in the Proposed Development including around Telegraph Woods SINC, the wider site boundaries and throughout the Boundary Lakes Golf Course.</i>

2.1 Tree Works

2.1.1 Character Area 1 & 2

Tree No.	Proposed Works
T1, T8, T9, T24, T25, T26, G27 & T34	Fell
G20	Fell section as shown on the enclosed plan
G28	Fell section as shown on the enclosed plan
G35	Fell section as shown on the enclosed plan



1.6 LANDSCAPING AND LANDSCAPE MANAGEMENT MUST PROVIDE MORE BENEFIT FOR WILDLIFE

EBC Query 1.13

We need to see a plan showing the exact location of the woodland canopy edge with a 20-metre buffer zone free from any development from the woodland canopy edge to the development. The buffer zone must not include domestic gardens, fences, and paved paths. For example, Landscape Plan Area 5 sheet 5 of 6 shows that the proposed shared drive/pedestrian access, the footpath, some of the residential gardens labelled A and B, and the turning area in the road are very close to the woodland boundary.

Response

The scheme design has changed significantly since these comments have been received. A 20 m buffer to Telegraph Woods SINC is provided in almost all parts of the scheme - only two small sections of minor residential road falls within the buffer. The woodland edge is being reinforced through new native tree and

<i>shrub planting now proposed. Please refer to the landscape drawings and post development BNG plan produced by Johns Associates (2023).</i>
EBC Query 1.14
There are currently very steep slopes at edges of the site boundary with Telegraph Woods SINC. The site is raised much higher than the SINC for most of this boundary. The stability of these slopes is uncertain, but intensive development of this area could result in land slips towards the SINC. How is this slope proposed to be stabilised? The slope would be shaded by the woodland edge making it difficult to establish vegetation to stabilise the soil.
Response
<i>The scheme design has changed significantly since these comments has been received. Please refer to the separate Calderpeel sections that have been produced to demonstrate how this slope and associated land stability (and retaining structures) have been addressed. As a result of providing the revised buffer to Telegraph Woods, there is minimal intervention required in this zone and substantial new planting of trees and shrubs are proposed.</i>

1.7 THE PROPOSAL WOULD CAUSE A DETERIORATION IN THE CONDITION OF THE ADJACENT TELEGRAPH WOODS SINC THROUGH INCREASED FOOTFALL THROUGH TELEGRAPH WOODS SINC

EBC Query 1.15
Although several documents mention that increased recreational opportunities would be provided on site, there is no single document which describes the recreation locations provided. The increase in residential development would put more recreational pressure on the SINC. No current recreational usage data has been provided but from our site visit it was clear that dog walkers are currently using the SINC and some of the current site. With this site being further developed and no longer available to dog walkers, there would be an increase in the number of dog walkers using the SINC and a resulting increase in nutrients from dog waste. It is also likely to result in the creation of informal BMX tracks and jumps, clearings, den building, rope swings and other recreational activities in the woodland.
Response
<i>Please refer to the Calderpeel drawings and Johns Associates landscape drawings for the location and extent of recreational areas. These include areas of green space within the Proposed Development, the new fan zone area in Zones 1 and 2, improved PRoW and Permissive Paths within the wider Ageas Bowl and Boundary Lakes golf course site.</i>
<i>In terms of demonstrating efforts to minimise potential recreational impacts on Telegraph Woods SINC from the growth in population and existing and new paths, the Proposed Development will include the provision of suitable Homeowner Packs with engaging information to highlight the benefits provided by and sensitivity of Telegraph Woods SINC, responsible recreational (including dog walking) behaviour and also highlighting (with a map) other local amenities that can be used eg connecting pavements, PRoW, open green space and local country parks and SANGs. In addition, new information boards about the SINC and responsible recreational use will be designed and provided at the entrance from the development and from Telegraph Road. The mechanism, detail and locations can be agreed through a suitably worded and enforceable planning condition. A local 'Friends of Telegraph Woods' will be encouraged within the information pack to foster awareness and local stewardship.</i>

1.8 PROPOSED SANG IN TELEGRAPH WOODS SINC

<i>EBC Query 1.16</i>
The proposed SANG is outside the red line boundary and no additional information has been proposed other than an indicative 2.5 km walk. No baseline ecological surveys have been done in the woodland, so it is not possible to assess what the impact of the development would be. Baseline surveys of Telegraph Woods are required.
<i>Response</i>
<i>This proposal is no longer being considered. In order to mitigate relevant ecological impacts of the Proposed Development (e.g. recreational impacts on the New Forest SPA) appropriate financial contributions will be made to off-site schemes to be agreed with Eastleigh Borough Council which will be secured by way of a s106 legal agreement'.</i>
<i>EBC Query 1.17</i>
The SANG would be public open space in terms of land use. This might require a change of use application. Telegraph Woods is owned by the Provost and Scholars of the Queens College in the University of Oxford. It is leased to Eastleigh Borough Council.
<i>Response</i>
<i>The SANG proposal is no longer being considered.</i>
<i>EBC Query 1.18</i>
There is no data on the current use of this area by the public. How much discounting is needed or how much additional capacity exists? The Bracknell Forest method can be used to calculate this.
<i>Response</i>
<i>The SANG proposal is no longer being considered.</i>
<i>EBC Query 1.19</i>
Is this area going to be attractive for people walking dogs, especially in winter? It is a closed woodland and there is a history of anti-social behaviour on site. Would the visitor experience include a variety of habitats?
<i>Response</i>
<i>The SANG proposal is no longer being considered. Notwithstanding this, in terms of demonstrating efforts to minimise potential recreational impacts on Telegraph Woods SINC from the growth in population and existing and new paths, the Proposed Development will include the provision of suitable Homeowner Packs with engaging information to highlight the benefits provided by and sensitivity of Telegraph Woods SINC, responsible recreational (including dog walking) behaviour and also highlighting (with a map) other local amenities that can be used eg connecting pavements, PRoW, open green space and local country parks and SANGs. In addition, new information boards about the SINC and responsible recreational use will be designed and provided at the entrance from the development and from Telegraph Road. The mechanism, detail and locations can be agreed through a suitably worded and enforceable planning condition. A local 'Friends of Telegraph Woods' would be encouraged within the information pack to foster awareness and local stewardship.</i>
<i>EBC Query 1.20</i>
How would an increase in visitor numbers be managed to ensure no negative impacts on the habitats of the SINC?
<i>Response</i>
<i>The SANG proposal is no longer being considered. Notwithstanding this, in terms of demonstrating efforts to minimise potential recreational impacts on Telegraph Woods SINC from the growth in population and existing and new paths, the Proposed Development will include the provision of suitable Homeowner Packs with engaging information to highlight the benefits provided by and sensitivity of Telegraph Woods SINC, responsible recreational (including dog walking) behaviour and also highlighting (with a map) other local amenities that can be used eg connecting pavements, PRoW, open green space and local country parks and SANGs. In addition, new information boards about the SINC and responsible recreational use will be designed</i>

and provided at the entrance from the development and from Telegraph Road. The mechanism, detail and locations can be agreed through a suitably worded and enforceable planning condition. A local 'Friends of Telegraph Woods' would be encouraged within the information pack to foster awareness and local stewardship.

1.9 INSUFFICIENT GREEN INFRASTRUCTURE

EBC Query 1.21

The proposed development would eliminate most of Westwood Copse, an area of woodland containing mature sweet chestnut trees and hazel coppice stools (nesting bird and bat habitat) replacing it with a coloured resin bound surface and parking spaces. This area is marked G28. Whilst some vegetation is retained, this corner will not function as a woodland/copse but becomes isolated groups of vegetation. Specimen trees spaced at regular intervals in amenity grassland are proposed to surround the existing vegetation along the northern fan zone and Marshall Drive. The additional lighting proposed in this area will also decrease its value as wildlife habitat.

Response

The scheme design has changed significantly since these comments have been received. A greater proportion of this area is now retained within the new masterplan/layout with a minimal loss of trees now achieved. This feature is seen as being critical to the safe operation of the Ageas Bowl and will significantly enhance public ingress/egress (access) and was highlighted as being of importance to the Landscape and Urban Design Officer.

Please refer to the response to EBC 1.12.

Part of this zone already has artificial lighting of the existing pedestrian route and column lighting for the car park. The new access route would incorporate additional waymarking lighting but this would be subject to a detailed lighting strategy that takes into account ecological constraints, delivered through a suitable and enforceable planning condition.

EBC Query 1.22

Trees T 18 and T39, which have high bat roost potential, and T38 which has low bat roost potential, are located in this area. This section must be re-designed/re-located to preserve Westwood Copse and trees T18 and T39

Response

The scheme design has changed significantly since these comments have been received. A greater proportion of this area is now retained within the new masterplan/layout with a minimal loss of trees now achieved. This feature is seen as being critical to the safe operation of the Ageas Bowl and will significantly enhance public ingress/egress (access) and was highlighted as being of importance to the Landscape and Urban Design Officer.

Please refer to the response to EBC 1.12.

Part of this zone already has artificial lighting of the existing pedestrian route and column lighting for the car park. The new access route would incorporate additional waymarking lighting but this would be subject to a detailed lighting strategy that takes into account ecological constraints, delivered through a suitable and enforceable planning condition.

As such, there is no change in potential bat roost suitability associated with T39, T18 or T39 (as per the Johns Associates EcIA)

These revised and reduced proposals do require the removal of T18 (as per the Johns Associates EcIA), which is T24 in the Arboricultural Implications Assessment/Arboricultural Method Statement. This is a tree that was identified as having a woodpecker hole and cavity that offered potential bat roost feature (PRF) and previous climbing inspections identified that this was occupied by squirrel at the time, although its form means it had high suitability for bats (if not used by squirrel). Three inspections of the PRF were conducted in 2023 (June, July and September) from a tall ladder and endoscope by Matthew Johns CEnv. MCIEEM and holding NE Class Licence and Earned Recognition licence for bats. These inspections confirmed the ongoing use by squirrel and it is reasonable to conclude this feature is not a protected bat roost. A further precautionary inspection will be completed prior to felling. Should the feature not be used by squirrel then inspections will be completed to confirm no new opportunistic use by bats. The tree will be sectionally felled and the section containing the cavity retained and strapped to a suitable existing nearby tree to preserve the potential roosting opportunity.

EBC Query 1.23

Opportunities for well-connected blue-green infrastructure need to be maximised and strengthened along the entire perimeter of the site in line with Local Plan Policies DM1 and DM11. Links between this application site and the wider landscape are needed to allow the expansion of habitat for protected species such as foraging bats, nesting birds and dormice, which are found in the connected southern portion of the wider site. The existing perimeter vegetation corridor must be enhanced, widened, and connected with other landscape features rather than removed and replaced with un-connected new plantings. The SuDS features (ponds, swales, and streams) should be enlarged and linked to habitat areas such as perimeter vegetation and woodland buffer zones. This can be demonstrated in a blue-green infrastructure master plan.

Response

The scheme design has changed significantly since these comments have been received and a fundamental pillar of the revised ecological and landscape strategy is to provide further blue and green corridor connectivity within the Proposed Development and to the adjacent habitat areas. This has resulted in a number of further connectivity enhancements including an improved buffer with Telegraph Woods (tree and shrub planting), enhanced and new open watercourse and channel leading to the boundary with the adjacent David Lloyd centre, the realigned and improved Telegraph Brook alignment providing green/blue infrastructure improvements, new parkland landscape character associated with the main perimeter road, strengthened tree and shrub planting buffers to Telegraph Woods behind the proposed care home, enhanced marginal and mid-water habitat associated with the existing lakes, species rich grassland within the overflow car parking, with small groups of trees, together with the extensive linear woodland (tree, shrub and understorey) planting within the wider 18 hole golf course that stitches together the existing mature habitats.

The careful integration and arrangement of the Proposed Development within the existing landscape framework of the Site including the retention of existing trees and woodland along the Site boundaries wherever possible;

- New native tree and scrub structure planting within the Site and across the wider Boundary Lakes Golf Course;
- Ornamental tree and shrub planting with ecological value (that supports pollinators);
- New amenity and meadow grass areas;
- New or modified ponds / drainage features (associated with the Telegraph Brook)
- A site-wide SuDS strategy with permeable paving / planted and managed water storage systems used throughout and the enhancement of an existing drainage channel to achieve three forms of natural filtration;
- Ecological features such as habitat piles, log piles, hibernacula, and bird/bat boxes;
- Amenity spaces and features such as benches / seats / play equipment;
- Coordinated access and circulation strategy including new or enhanced footpath / cycle routes;

- Green roofs on buildings and structures where appropriate.

Collectively, this approach will deliver a high quality and integrated ecology and landscape framework for the Proposed Development and provide wider off-site benefits and an overall Biodiversity Net Gain.

Proposed planting strategy for the open channels and wetland areas will include species-rich grassland for seasonally wet/dry habitat, marginal and aquatic species.

Proposed planting to include wildflower / grass seeding as well as plug plants.

Wildflower and grass seed mix for occasionally damp areas eg Emorsgate EM8 Meadow Mixture for Wetlands sown at 40Kg/Ha. Mix contains 26 species of wildflowers and grasses.

Typical Mix of Plug Planted Marginal Species:

- *Alisma plantago*
- *Caltha palustris*
- *Carex acuta*
- *Iris pseudacorus*
- *Juncus effusus*
- *Lythrum salicaria*
- *Mentha aquatica*
- *Myosotis scorpioides*
- *Phragmites australis*
- *Ranunculus flammula*
- *Typha minima*
- *Veronica beccabunga*

Pre-planted (with the mix listed above) coir pallets will be installed around the marginal areas of the lakes within the Proposed Development. In addition, pre-planted vegetated floating islands will be installed in each of the lakes to further diversity the habitat structure and function within the lakes (currently lined and no vegetation) and improve its ecosystem diversity and function (notably for zooplankton, invertebrates, and plants).

Please refer to the separate landscape drawings and post-development BNG plan prepared by Johns Associates (Annex A).

This will be detailed through the preparation of a LEMP and the implementation of a suitably worded and enforceable planning condition.

1.10 HABITAT FOR PROTECTED SPECIES

EBC Query 1.24

Bat surveys were done in 2020 and updated in 2021. There were potential bat roost features on two buildings (Greenkeepers Cottages and the Wellness Centre), but no evidence of bats during surveys. Twenty trees were assessed as having potential bat roost suitability and the possibility of being affected by these proposals. Any changes to the layout that could affect tree retention or decreased distance from development would require re-assessment. T8 (low suitability), T18 (high suitability), T38 (low suitability) and T39 (high suitability) have viable PRF and are located within the development footprint. It is likely that the design can be adapted to enable the retention of trees T8, T38 and T39. Further consideration of the feasibility of retaining T18 will be given. If T18 cannot be retained, further surveys will be required in 2022 prior to determination of the planning application for the Mixed-Use Development.

Response
Please see the response to EBC 1.22
EBC Query 1.25
The greatest areas of bat activity were areas of broadleaved woodland, scrub, tall ruderal habitats and areas of standing water. These areas must be retained and enhanced as important green infrastructure for this site.
Response
<i>The scheme design has changed significantly since these have been received with a significantly reduced area of development in these habitats and increased planting proposals. Please refer to the responses to EBC 1.22 and 1.23 and the supporting Annexes to this document and the separate landscape drawings prepared by Johns Associates.</i>
EBC Query 1.26
The lighting around the parking areas also attracted foraging bats due to insect availability in these areas.
Response
<i>A suitable wildlife sensitive lighting strategy will be developed and agreed with EBC and will be delivered through a suitably worded and enforceable planning condition. This will aim to protect retained current and future created bat roost features, foraging habitat and connecting habitat.</i>
EBC Query 1.27
A wildlife sensitive lighting strategy is required to avoid illuminating any trees and potential bat roost features. All on-site lighting should be assessed so that it does not attract bats away from suitable natural foraging areas and into areas where they would be more vulnerable to predators.
Response
<i>A suitable wildlife sensitive lighting strategy will be developed and agreed with EBC and will be delivered through a suitably worded and enforceable planning condition. This will aim to protect retained current and future created bat roost features, foraging habitat and connecting habitat.</i>
EBC Query 1.28
Section 3.8 on page 25 of the Bat Technical Note has several notes that say Error! Reference source not found. This should be edited.
Response
<i>Apologies for this. The previous submissions are augmented/superseded by this document- we are not currently proposing to resubmit previous documents.</i>
EBC Query 1.29
The report states that it is likely this site lies within a core sustenance zone for common pipistrelle and noctule maternity roosts. Landscaping must include a wide range of night scenting species to attract moths as food for bats. It should be designed to flower over the longest possible season so that food is available over the entire bat activity season. Noctule bats also eat midges, beetles, mayflies and winged ants, so enhanced habitat such as woodland edge, scrub and tall ruderal vegetation should be incorporated into the landscaping to provide habitat for these invertebrates where bats can forage for them.
Response
<i>This is being delivered through the revised landscape and ecological strategy and will be monitoring and managed for the long term. Please refer to the response for EBC 1.23.</i>
EBC Query 1.30
Dormice were confirmed present in 2016/2017 on land to the far south of the wider site, associated with Thorneydown Farm. Habitat has been managed to minimise impact and enhance habitat in previous applications on the wider site. Dormice (or their signs) were not found in the northern part of the wider site (this application site) in nest tube surveys conducted in 2019, 2020 and 2021. There is poor connectivity between this application site and the wider landscape. Dormice are assumed absent on this application site, but if they were present historically, any existing potential habitat must be protected and a precautionary working method used. The links between this application site and the wider landscape must be increased to allow the expansion of habitat of protected species such as dormice.

<i>Response</i>
<i>The scheme design has changed significantly since these comments have been received. This has resulted in a number of further connectivity enhancements including an improved buffer with Telegraph Woods (tree and shrub planting), enhanced and new open watercourse and channel leading to the boundary with the adjacent David Lloyd centre, the realigned and improved Telegraph Brook alignment providing green/blue infrastructure improvements, new parkland landscape character associated with the main perimeter road, strengthened tree and shrub planting buffers to Telegraph Woods behind the proposed care home, enhanced marginal and mid-water habitat associated with the existing lakes, species rich grassland within the overflow car parking, with small groups of trees, together with the extensive linear woodland (tree, shrub and understorey) planting within the wider 18 hole golf course that stitches together the existing on site and adjacent mature habitats.</i> <i>Suitable precautionary method statements will be prepared as part of the proposed CEMP and supervised by an Ecological Clerk of Works. This will be delivered through a suitably worded and enforceable planning condition.</i> <i>Please refer to the response to EBC 2.23, the updated landscape plans and post-development BNG plans produced by Johns Associates.</i>
<i>EBC Query 1.31</i>
Habitat suitability for great crested newts was assessed for all waterbodies at or within 500 m of the site, which includes the Ageas Bowl and Boundary Lakes Golf Club. Six ponds were within the golf course and one in the north of Telegraph Woods. Six of the ponds were found to have average habitat suitability, and one was below average. These seven were sampled for great crested newt eDNA, and all the tests returned a negative result. Therefore, great crested newts are presumed likely absent from this site. The nearest known record of great crested newts is 2.6 km to the south of the site.
<i>Response</i>
<i>No further action required.</i>
<i>EBC Query 1.32</i>
Reptile surveys were conducted in 2020, repeating surveys done in 2007 and 2017. Slow worms were recorded in 2007 in retained habitat around the perimeter of the site and in newly created habitat in the Ageas Bowl and golf course refurbishment works. In 2020 suitable reptile habitat for foraging, basking and hibernating reptiles was recorded on site. The text at the bottom of page 3 of the Reptile Survey Technical Report states that No reptiles were observed at any time during the surveys (1-6) carried out during May to early July 2020. However as reported in table 3, slow worms were found under refugia, and one slow worm was seen on a walking transect on visits 7-13 all during September 2020. This represents a low population of slow worms. Since common lizards were recorded on previous surveys it should be assumed that they are also present. Any suitable reptile habitat must be retained and enhanced.
<i>Response</i>
<i>A suitable reptile method statement including sequential and directional management of vegetation towards either retained habitat (if large enough) or capture/translocation from smaller areas using reptile fencing/artificial refugia) will be integrated into the CEMP and implemented by a suitably qualified ecologists. Any retained suitable reptile habitat will be enhanced and extended. This will be delivered through a suitably worded and enforceable planning condition.</i>
<i>EBC Query 1.33</i>
The site has been surveyed for badgers since 2007. There is an active main badger sett in a woodland copse near the southern central part of the Boundary Lakes Golf Club and two outlier setts within Telegraph Woods. An artificial sett was created for a previous planning application. Very limited badger activity or evidence is present within other parts of the site, including the masterplan area proposed for re-development as part of this planning application. Due to the potential presence of badgers commuting through the site, if this application is approved, additional surveys will be required until the commencement of works and precautionary working methods for badgers are required. Limited badger activity or evidence is present within other parts of the site,

including the masterplan area proposed for re-development as part of this planning application. Due to the potential presence of badgers commuting through the site, if this application is approved, additional surveys will be required until the commencement of works and precautionary working methods for badgers are required.
<i>Response</i>
<i>Additional surveys were completed throughout 2023 by Matthew Johns CEnv MCIEEM. No change in status or new setts were identified. This will be continued until completion of works, with precautionary methods being implemented unless an new active badger sett in conflict with the works is created. In this event, a Natural England Badger licence will be obtained and works will follow a compliant licensable Method Statement.</i>

Increased enhancement provision required

<i>EBC Query 1.34</i>
As recommended in the letter from Hampshire Swifts (October 2022) nest boxes on buildings should be integral swift brick types, as these are permanent, require no maintenance, have better temperature regulation with future climate change in mind, and are aesthetically integrated with the design of the development. Swift bricks are a universal nest brick as they are readily used not just by Swifts but also by House Sparrows, Starlings (provided the entrance is large enough), Great Tits, Blue Tits and other species. The British Standard BS 42021:2022 Integral nest boxes recommend at least 1 integral nest brick per dwelling, from four to 10 on a small block of flats and 10 to 40 or more on a large building, such as a hotel etc.
<i>Response</i>
<i>These features will be incorporated into buildings as specified above. A detailed plan confirming the specific location and numbers will be produced and delivered through a suitably worded planning condition.</i>

Surface water drainage issues

<i>EBC Query 1.35</i>
Local plan policy DM 6 states New development (excluding extensions to dwellings and changes of use) will only be permitted if it incorporates Sustainable Drainage Systems (SuDS). Wherever feasible, naturalised filtration should be included within the treatment train as follows: On sites of 1 hectare or more, or within 100m of the River Itchen SAC or Solent Maritime SAC, SuDS schemes should include at least three forms of naturalised filtration.
<i>Response</i>
<i>The scheme design has developed significantly since the comments were received. Appropriate drainage designs including suitable Sustainable Drainage Systems, with naturalised filtration, and three forms of filtration, have been incorporated as a key feature of the Proposed Development. Please refer to the separate submissions from Sustain Environmental (formerly Andy Clay Consultants) for full details.</i>
<i>EBC Query 1.36</i>
It is not clear that there are 3 forms of naturalised above ground filtration for all of the surface water drainage from each area of the site. It must be clearly demonstrated how the proposals adhere to policy DM6 for the surface water drainage of the entire site.
<i>Response</i>
<i>The scheme design has developed significantly since the comments were received. Appropriate drainage designs including suitable Sustainable Drainage Systems, with naturalised filtration, and three forms of filtration, have been incorporated as a key feature of the Proposed Development. Please refer to the separate submissions from Sustain Environmental (formerly Andy Clay Consultants) for full details.</i>

EBC Query 1.37
Statement 2.9 of the Flood Risk Assessment report states that Surface water conveyance routes under exceedance conditions must also be planned for to ensure that life and property over the site and surrounding area are not put at risk in the event of drainage system failure or from storms in excess of the design standards. The main culverted channel of Telegraph stream which runs under the Ageas Bowl has been blocked for some time, which has caused flooding and damage to the trees in Telegraph Woods SINC. This culvert is 6.8 m beneath ground level at its deepest point. Reliance on just one channel with no alternative routes for the water to follow could cause similar problems in the future. This highlights the vulnerability of this SuDS proposal. Local Plan policies DM3, DM5 and DM6 have been cited in 2.13 to 2.16. What would ensure that this blockage does not re-occur? EBC's policy DM6 requires de-culverting wherever possible. This reduces the potential for blockages whilst providing ecological benefits.
Response
<i>The scheme design has developed significantly since the comments were received. Appropriate drainage designs including suitable Sustainable Drainage Systems, with naturalised filtration, and three forms of filtration, have been incorporated as a key feature of the Proposed Development. Please refer to the separate submissions from Sustain Environmental (formerly Andy Clay Consultants) for full details.</i>
EBC Query 1.38
The section of Telegraph Brook passing along the northern boundary of the site is reported to be an open semi-natural watercourse in a simple trapezoidal channel aligned with (should read lined with) trees and hedges. The outlet of the culvert was down a very steep bank and not visible due to dense vegetation at the time of the site visit. How will the landscaping be managed along this stream/ditch to avoid sedimentation and pollution and to maximise its ecological value? The attenuation pond, swales and basin will be part of an informal recreation area. In addition to the ecological diversity, what planting is proposed in this area to keep it safe (not used for swimming dogs and people) and unpolluted? How are these areas linked into the blue-green infrastructure of the site?
Response
<i>The scheme design has developed significantly since the comments were received. Appropriate drainage designs including suitable Sustainable Drainage Systems, with naturalised filtration, and three forms of filtration, have been incorporated as a key feature of the Proposed Development. Please refer to the separate submissions from Sustain Environmental (formerly Andy Clay Consultants) for full details. Please also refer to the response to EBC 1.23.</i>
EBC Query 1.39
The water in Telegraph Brook is discharged into a tributary of Pudbrook Lake, under the M27 and eventually into the River Hamble.
Response
<i>Thank you. This is understood and the scheme designed with this in mind. Please refer to the separate submissions from Sustain Environmental (formerly Andy Clay Consultants) for full details.</i>
EBC Query 1.40
The drainage channel shown to the north of the sleeper lined section of Telegraph Brook runs along the southern edge of the northernmost vegetation and continues along the boundary with Botley Road, crossing under the site entrance to the east of Marshall Drive and the current footpath entrance, and then continues towards the M27. This needs to be shown in figure 3.5 but is discussed in section 3.43 of the FRA. This drainage channel is needs to be shown in the landscape plan for this area and would be affected by the construction of parking zones 2, 2B and 3, the resurfaced path from the existing Botley Road site access, and the relocated PRow Route 241:509 as shown on landscape plan Area 1 (East) sheet 2 of 6 (issue 09, June 2022). This must also be considered in the CEMP.
Response
<i>The scheme design has developed significantly since the comments were received. Appropriate drainage designs including suitable Sustainable Drainage Systems as a key feature of the Proposed Development. Please refer to the separate submissions from Sustain Environmental (formerly Andy Clay Consultants) and the</i>

<i>revised Landscape Drawings (by Johns Associates) for full details. This will be incorporated into the CEMP, which will be delivered by a suitably worded and enforceable planning condition.</i>
EBC Query 1.41
The Landscape Plan of area 5 (west) sheet 5 of 6 shows the realigned culverted section of Telegraph Brook running under the street and then under the proposed shared drive/pedestrian access. As this culvert is reported to be 6.8 m deep, the digging required to re-align it would be substantial, with the potential to add sediment to Telegraph Brook. The CEMP must contain specific details to avoid pollution in this area. A dog-leg in the new alignment could increase potential to block. As previously mentioned, de-culverting this stretch of watercourse must be re-visited.
Response
<i>The scheme design has developed significantly since the comments were received. Appropriate drainage designs including suitable Sustainable Drainage Systems as a key feature of the Proposed Development. Please refer to the response to EBC 1.7, separate submissions from Sustain Environmental (formerly Andy Clay Consultants) and the revised Landscape Drawings (by Johns Associates) for full details. This will be incorporated into the CEMP, which will be delivered by a suitably worded and enforceable planning condition.</i>
EBC Query 1.42
In Section 3.60 it states that there is a 150 mm diameter surface water sewer... at the junction of Westgate Mews and Kenilworth Gardens draining NW along this road but it is not clear whether this is proposed to be used in this scheme.
Response
<i>Thank you. This is understood and the scheme designed with this in mind. Please refer to the separate submissions from Sustain Environmental (formerly Andy Clay Consultants) for full details.</i>
EBC Query 1.43
Section 6.15 mentions the possibility of discharge of surface water to a surface water/combined sewer. The use of combined sewers increases the risk of untreated sewage discharges into rivers, streams and the sea in times of heavy rainfall. This causes pollution incidents, has a detrimental effect on water quality, and must not be allowed to occur.
Response
<i>Thank you. This is understood and the scheme designed with this in mind. Please refer to the separate submissions from Sustain Environmental (formerly Andy Clay Consultants) for full details.</i>
EBC Query 1.44
Section 7.8 states An existing and presumably blocked culvert is being removed and replaced with a re-aligned culvert and open section of channel in the western part of the site and a more natural two stage channel in the eastern part of the site. This will improve the watercourse and increase in- channel flood storage capacity. The proposed development has been laid out to enable access and maintenance of the re-aligned culvert and open section of channel.
Response
<i>Thank you. This is understood and the scheme designed with this in mind. Please refer to the separate submissions from Sustain Environmental (formerly Andy Clay Consultants) for full details.</i>

Further details are required on how access and maintenance of a re-aligned culvert would be achieved.

EBC Query 1.45
The discharge of surface water off site is proposed to go under the M27 and into a stream that feeds into a stream designated EA main river (which is a tributary of the River Hamble) when it crosses under Tollbar Way and through the Waterloo Industrial Estate.
Response
<i>Thank you. This is understood and the scheme designed with this in mind. Please refer to the separate submissions from Sustain Environmental (formerly Andy Clay Consultants) for full details.</i>

Combined effects on the local area

EBC Query 1.46
The addition of 185 dwellings, a 71-bedroom care home and a 142-bedroom hotel to an already developed site would be an over-development. The retained edge habitat would be impacted by this large increase in the number of people living at and regularly using the site.
Response
<i>The scheme design has evolved since these comments have been received and the overall number of housing units reduced. Please refer to the information set out in the responses above.</i>
EBC Query 1.47
Biodiversity corridors need to be strengthened rather than weakened.
Response
<i>Please refer to the information set out in the responses above.</i>

3 NATURAL ENGLAND: QUERIES AND REQUEST FOR FURTHER INFORMATION

HRA

NE Query 1.1
A shadow Habitats Regulations Assessment (sHRA) been produced by Johns Associates (May 2022) in support of this planning application. Natural England notes that this sHRA has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.
Response
<i>No further response required to EBC. EBC to request further supporting information if this is needed.</i>

Mitigation

NE Query 1.2
It is advised that SuDS features intended to help achieve nitrogen neutrality should be appropriately designed (along with suitable long term maintenance plans) in order to ascertain an accurate N removal that can be maintained over time. Monitoring their effectiveness over time will be key to allow for adaptive management. We recommend that such features are designed in line with the Wetland Mitigation Framework that has been recently published by the Constructed Wetlands Hub and the Rivers Trust. However it should be borne in mind that the level of certainty for N removal is highly dependent on influent concentrations, which in the context of treating surface water is likely to be variable, and this will need to be factored in.
Response
<i>Thank you. This is understood and the scheme designed with this in mind. Please refer to the separate submissions from Sustain Environmental (formerly Andy Clay Consultants) for full details. A detailed design of the SuDS features to ensure these requirements are delivered long term will be provided in response to a suitably worded and enforceable planning condition.</i>

NE Query 1.3
The long term monitoring and maintenance of SuDS will be key to maintaining their optimal effectiveness in perpetuity. Further details are required to confirm the mitigation measure(s) proposed at this site, and quantify the reduction of N loss that may be achieved through each measure.
Response
<i>Thank you. This is understood and the scheme designed with this in mind. Please refer to the separate submissions from Sustain Environmental (formerly Andy Clay Consultants) for full details. A detailed design of the SuDS features to ensure these requirements are delivered long term will be provided in response to a suitably worded and enforceable planning condition. Should additional nutrient offsetting be required, then an appropriate financial contribution will be paid to EBC as part of the proposed S106 Agreement.</i>
NE Query 1.4
The local planning authorities are the competent authorities with regard to the Habitat Regulations and must be assured and satisfied that any mitigation proposed can be secured and delivered in perpetuity. Any scheme for offsetting nitrogen must meet the basic tests of certainty of delivery, enforceability and the need for securing the adopted measures for perpetuity to ensure it is effective mitigation.
Response 1.5
<i>Thank you. This is understood and the scheme designed with this in mind. Please refer to the separate submissions from Hilson Moran and Sustain Environmental (formerly Andy Clay Consultants) for full details. A detailed design of the SuDS features to ensure these requirements are delivered long term will be provided in response to a suitably worded and enforceable planning condition. Should additional nutrient offsetting be required, then an appropriate financial contribution will be paid to EBC as part of the proposed S106 Agreement.</i>

Recreational Disturbance - New Forest SAC, SPA and Ramsar

NE Query 1.6
It is noted the applicant proposes to use land adjacent to the application site, Telegraph woods, as provision of a Suitable Alternative Natural Greenspace (SANG). The proposals for the site include a 2.5 km circular walk. Please note, the size of the proposed area requires clarification, noted as 20.27 ha on page 39 and 17 ha on page 39 of the sHRA. There is currently insufficient information to enable the certainty that the use of this SANG to provide mitigation will be effective in ensuring no likely significant effect arising from recreational impacts to the New Forest designated sites.
Response
<i>There has been substantial re-design and amendments to the operational strategy since these comments were received and this is no longer being proposed. Please refer to the responses set out in Section 1.8 above.</i>
NE Query 1.7
A SANG Management Plan should be submitted laying out the SANG design and ongoing site management techniques, this document should include the capital costs for the site, and the costings and funding mechanism for the in-perpetuity management of the SANG. The Plan should clearly set out how the Natural England SANG Criteria will be met on the site and who the management will ultimately default to. Further information on any phasing of the development and how this relates to SANG development should be also be detailed.
Response
<i>There has been substantial re-design and amendments to the operational strategy since these comments were received and this is no longer being proposed. Please refer to the responses set out in Section 1.8 above.</i>
NE Query 1.8
In line with Policy WE4 of Eastleigh Borough Council's Adopted Local plan 2016-2036, the development should demonstrate that there will be no adverse impact on the adjacent Telegraph Woods SINC, with appropriate environmental buffers from development.

Response
There has been substantial re-design and amendments to the operational strategy since these comments were received. Please refer to the responses set out above and the responses in Sections 1.7 and 1.8 above.

Recreational disturbance - Solent SPA

NE Query 1.9
It is understood the applicant plans to mitigate recreation disturbance to the Solent SPA sites with provision of the proposed SANG. Please see comments above in relation to the proposed SANG. Should the applicant wish to contribute this agreed strategic scheme, provided that the applicant is complying with the policy and the Bird Aware Definitive Strategy, Natural England would be satisfied that the applicant has mitigated against the potential adverse effects of the development on the integrity of the European site(s).
Response
<i>This proposal is no longer being considered. In order to mitigate relevant ecological impacts of the Proposed Development (e.g. recreational impacts on the Solent SPA) appropriate financial contributions will be made in accordance with the Solent Bird Aware SPD, to be agreed with Eastleigh Borough Council which will be secured by way of a s106 legal agreement'.</i>
NE Query 1.10
Further clarifications on the estimated contribution is required, the figure should take account for the proposed care home/independent living facility and hotel, in addition to the residential housing.
Response
<i>An appropriate financial contributions will be made in accordance with the Solent Bird Aware SPD, to be informed by an updated contribution level provided by Eastleigh Borough Council, which will be secured by way of a s106 legal agreement'.</i>

Biodiversity Net Gain

NE Query
One method to ensure net gain is achieved is to compile a Biodiversity Mitigation and Enhancement Plan (BMEP) or similar document that aims to protect and improve the local ecology. This can help to strengthen ecological networks and wildlife corridors. Such a Plan can bring together specific avoidance, mitigation and any compensatory measures to address impacts on species and habitats, detail how biodiversity net gain will be achieved, plus detail additional enhancement measures for wildlife (such as bat and bird boxes, habitat refuges etc.). Such a plan should be agreed with the district ecologist / biodiversity officer and appropriately secured with any planning permission.
Response
A BMEP will be prepared and delivered in accordance with a suitably worded and enforceable planning condition, and in compliance with all relevant BNG delivery legislation.

Surface Water Drainage

NE Query
The detailed design of a Sustainable Drainage System (SuDS) should be submitted and agreed with Eastleigh Borough Council. This should include evidence to show that the proposed SuDS scheme will ensure there will be no deterioration in water quality [or changes in water quantity] in discharges from the site. Information on the long term management and maintenance (including funding) of the SuDS for the lifetime of the development should also be secured prior to the commencement of any works.

Response
<i>Thank you. This is understood and the scheme designed with this in mind. Please refer to the separate submissions from Hilson Moran and Sustain Environmental (formerly Andy Clay Consultants) for full details. A detailed design of the SuDS features to ensure these requirements are delivered long term will be provided in response to a suitably worded and enforceable planning condition. Should additional nutrient offsetting be required, then an appropriate financial contribution will be paid to EBC as part of the proposed S106 Agreement.</i>

Construction Environmental Management Plan

NE Query
Natural England advise best practice is employed during the construction phase to avoid impacts on the SINC. For example, a Construction Environmental Management Plan (CEMP) can be submitted to and approved in writing by the council's ecologist/biodiversity officer that identifies the steps and procedures that will be implemented to avoid or mitigate constructional impacts on species and habitats. The CEMP should include the following impacts: • Storage of construction materials/chemicals and equipment; • Dust suppression • Chemical and/or fuel run-off from construction into nearby watercourse(s) • Waste disposal • Noise/visual/vibrational/lighting impacts The approved CEMP can be secured via an appropriately worded condition attached to any planning consent and shall be adhered to at all times, unless otherwise first agreed in writing with the Local Planning Authority.
Response
An appropriate CEMP will be prepared and delivered in accordance with a suitably worded and enforceable planning condition.

4 CONCLUSION

This document sets out appropriate responses to each of the queries relating to the ecological aspects of the Proposed Development as raised by EBC and NE through formal correspondence. In each case, it has been possible to set out an response that resolves the query raised in a positive and appropriate manner, either through associated plans and documents also being provided to EBC and NE (including this document) or to be delivered through a subsequent enforceable Planning Condition or legal agreement as appropriate.

Overall the Proposed Development now succeeds in avoiding and minimising negative effects on ecology as far as possible and providing appropriate mitigation and compensation where this is not possible. It also includes a wide range of ecological enhancement features and delivers an overall Biodiversity Net Gain of 14.53 percent habitat units and 161.59 in hedgerow units, that meet the Defra Metric 4 Trading Rules and are delivered both within the planning application boundary and within the contiguous land associated with Boundary Lakes Golf Club and under the control of the Ageas Bowl.

Taking into account all of the evidence now presented in Support of Planning Application ref F/22/93194 , acknowledging that further details and certain financial payments need to be agreed and provided, as suitably worded and enforceable planning conditions and a S106 agreement, it is reasonable to conclude that it meets national and local planning policy relating to ecology and is also compliant with relevant legislation and best practice.

In conclusion, planning permission for the Proposed Development should be supported with respect to the ecological aspects of the scheme.

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01/12/23

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5 APPENDIX A BNG REPORT

LAND DEVELOPMENT ADVISORY LTD

Ageas Bowl Biodiversity Net Gain Assessment Technical Note

INTRODUCTION

1.1 BACKGROUND

Johns Associates Ltd was commissioned by Land Development Advisory Ltd to undertake a Biodiversity Net Gain Assessment in support of a full planning application for development proposals associated with the Ageas Bowl.

This Technical Note provides the results of the Biodiversity Net Gain Assessment at the Ageas Bowl Redevelopment Site (hereafter referred to as the Site, shown as Figure 1).

1.2 PURPOSE OF THIS REPORT

This report has been produced to provide the Defra Metric 4.0 BNG assessment for the Site based upon the UKHab Technical Note (Johns Associates, 2020). The Landscape Masterplan Planting Strategy MP-008 and BNG Offset Delivery Plan J00828-BNG-01 by Johns Associates have informed and been included in the post-development BNG calculations.

1.3 BIODIVERSITY METRIC 4.0

The Biodiversity Metric 4.0 uses habitat as a proxy for overall biodiversity within different habitat types. Habitats are assigned a value based on their intrinsic biodiversity value or 'distinctiveness', which is predefined for each habitat within the metric. This value is then multiplied based on the size, condition and geographical location of the habitat in order to ascertain its absolute value in 'biodiversity units'. Separate calculations are used within the metric for area-based habitats, linear habitats (such as hedgerows) and watercourses (including ditches and streams). These units are non-transferable and must therefore be considered individually for each project or development. Hereafter they will be referred to as "habitat units", "hedgerow units" and "river units" respectively. Collectively, they will be referred to as "biodiversity units".

DEFRA provides a Calculation Tool with all calculations built in to aid in the assessment process. This report should be read in conjunction with the Calculation Tool provided for the assessment of this Site.

Underlying this assessment process are a key set of principles which explain the intended use of the Metric 4.0. They are as follows:

- Principle 1 - The metric does not change the protection afforded to biodiversity, statutory obligations, or policy requirements. The use of the metric does not override the ecological mitigation hierarchy.
- Principle 2 - The metric should be used in accordance with established good practice guidance and professional codes.

- Principle 3 - The metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.
- Principle 4 - The metric's biodiversity units are only a proxy for biodiversity and should be treated as relative values.
- Principle 5 - The metric is designed to inform decisions, in conjunction with locally relevant evidence, and expert input.
- Principle 6 – Habitat interventions need to be realistic and deliverable within a relevant project timeframe.
- Principle 7 – Where practical and reasonable, created and enhanced habitats should seek to be local to the impact and deliver strategically important outcomes for nature conservation.
- Principle 8 - The metric does not enforce a mandatory minimum 1:1 habitat size ratio for losses and compensation but consideration should be given to maintaining habitat extent and habitat parcels of sufficient size for ecological function.

During the process of undertaking a biodiversity net gain assessment using the DEFRA Metric 4.0, the following rules must be followed to ensure its proper use:

- Rule 1 – Competency requirements must be complied with.
- Rule 2 - Biodiversity unit values generated by the biodiversity metric 4.0 are unique to this metric and cannot be compared to unit outputs from previous versions of the Defra metric or any other biodiversity metric. Furthermore, the three types of biodiversity units generated by this metric (for area, hedgerow and watercourse) are unique and cannot be summed.
- Rule 3 – The trading rules of this metric must be followed. 'Trading down' must be avoided. Losses of habitat are to be compensated for on a "like for like" or "like for better" basis. New or restored habitats should aim to achieve a higher distinctiveness and/or condition than those lost. Losses of irreplaceable or very high distinctiveness habitat cannot adequately be accounted for through the metric.
- Rule 4 – Losses and deterioration of irreplaceable or very high distinctiveness habitat cannot be accounted for through this metric.
- Rule 5 - Deviations from the published methodology of the biodiversity metric 4.0 need to be ecologically justified and agreed with relevant decision makers. While the methodology is expected to be suitable in the majority of circumstances it is recognised that there may be exceptions. Any local or project-specific adaptations of the metric must be transparent and fully justified.

Figure 1 – Site Location



2 METHODOLOGY

2.1 STRATEGIC SIGNIFICANCE

As part of the BNG assessment, habitats are afforded different levels (high, moderate or low) of strategic significance, which describes the local significance of the habitat based on its location and the habitat type. Habitats were assigned a strategic significance value using the Eastleigh Borough Local Plan (2016-2036) Adopted April 2022.

2.2 DISTINCTIVENESS

For the purpose of the metric assessment, distinctiveness refers to the relative scarcity of the habitat and its importance for nature conservation. The actual values assigned to each habitat type used in the metric are given in the Technical Supplement. These are automatically applied by the calculator tool based on the habitat type.

2.3 HABITAT CLASSIFICATION AND CONDITION ASSESSMENT

2.4 BIODIVERSITY METRIC 4.0 METHODOLOGY

The Defra Biodiversity Metric 4.0 provides a nationally measurable structured calculation methodology to account for biodiversity losses and gains resulting from development or land management change. The Biodiversity Metric 4.0 uses habitat, the places in which species live, as a proxy to describe biodiversity. These habitats are converted into measurable 'biodiversity units'. These biodiversity units are the 'currency' of the metric.

Biodiversity units are calculated using the size of a parcel of habitat and its quality. The metric uses habitat area as its core measurement, except for linear habitats where habitat length is used. To assess the quality of a habitat the metric scores habitats of different types, such as woodland or grassland, according to their relative biodiversity value. Habitats that are scarce or declining typically score highly relative to habitats that are more common and widespread. The metric also takes account of the condition of a habitat. The metric accounts for the location of the habitat relative to other similar habitats to measure its connectedness in the landscape. Being 'better' and 'more joined-up' are important facets of habitats that can contribute to halting and reversing biodiversity declines. Lastly, the metric also accounts for whether or not the habitat is sited in an area identified locally, typically in a relevant policy of plan, as being of significance for nature.

Where new habitat is created, or existing habitat is enhanced the difficulty and associated risks of doing so are taken into account by the metric. If habitat is created to compensate for losses elsewhere, then the metric also takes account of its proximity to the impact site. The metric incentivises delivery that is on or close to the impact site.

The Defra Metric 4.0 Biodiversity score has been calculated for the existing habitats at the Site and for the habitats proposed within the masterplan. The site was split into distinct habitat parcels and linear habitats based on the UKHab system, which were then mapped and measured using the ArcGIS mapping tool. A baseline habitat plan is provided Appendix A.

The area or length of each habitat type was entered into the Calculation Tool along with the condition and strategic significance (informed by the desk study) in order to obtain the baseline (i.e. existing) value of each in biodiversity units. This process was repeated for the post-development habitats to be retained, enhanced and/or newly created. The post-development habitat plans are provided in Appendix B.

BNG is an approach to development that seeks to halt the current loss of biodiversity through development and through the planning system; restore ecological networks through early master planning and increase the natural habitat resource and ecological features. This has been included within the Environment Act 2021, and a mandatory requirement for development to enhance the ecological value of a site by a minimum of 10% will come into force for most developments in November 2023.

2.5 LIMITATIONS, CONSTRAINTS AND ASSUMPTIONS

The findings of this report are valid at the time of reporting. Should there be delays to the project timetable and/or implementation of the proposed development, updated desk study and/or site survey work may be required. In this instance, advice should be sought to ensure the data, recommendations and conclusions set out in this report remain valid. No limitations or constraints with regard to the field survey or desk study were encountered and therefore the BNG calculations are considered valid.

3 BNG SURVEY RESULTS

3.1 STRATEGIC SIGNIFICANCE

The Site is not formally identified within the Local Plan, therefore a 'Low' level of strategic significance has been applied consistently to both lost and enhanced/created habitats within the proposed Site boundary.

3.2 ON-SITE BASELINE HABITATS

Habitats identified on Site comprised other neutral grassland, bramble scrub, modified grassland, lowland mixed deciduous woodland, artificial unvegetated, unsealed surface, bracken, developed land; sealed surface, other woodland; broadleaved, ornamental lake or pond, introduced shrub, other woodland; mixed, mixed scrub and urban trees. A UKHabs plan is provided in Appendix A.

Habitats are described in detail within the UK Habitat Classification Survey Technical Note (Johns Associates, 2020).

3.2.1 Amendments to UKHab Technical Note

Westwood Copse has been reclassified as other woodland; broadleaved in response to comments from the Eastleigh Borough Council ecologist dated 24/10/2023.

Two small sections previously identified as lowland mixed deciduous woodland and modified grassland following a Site visit in November 2023.

4 BNG ASSESSMENT

4.1.1 Habitat Retention

The lowland mixed deciduous woodland on Site will be protected and retained throughout the lifetime of the development. Table 1 outlines the areas of habitats will be retained throughout the development.

Table 1 Summary of retained habitat areas on Site

Habitat	Area
Modified grassland	8.36
Developed land, sealed surface	2.93
Developed land, sealed surface	2.65
Other woodland; broadleaved	1.40
Ornamental lake or pond	0.52
Other lowland mixed deciduous woodland	0.36
Introduced shrub	0.09
Artificial unvegetated unsealed surface	0.04

Approximately 6ha of the grassland on Site will be retained to form the 'rough' areas of the golf course. These areas are expected to remain in 'Poor' condition according to the DEFRA metric 4.0 condition assessments.

4.1.2 Habitat Loss

Table 2 provides a summary of the areas of habitats that will be lost to facilitate the development. The majority of habitat lost will be artificial unvegetated, unsealed surface and modified grassland, both of which are of little ecological importance.

Table 2 Summary of habitat loss on Site

Habitat	Area (Ha)
Artificial unvegetated unsealed surface	2.78
Modified grassland	2.05
Other neutral grassland	0.99
Other woodland; mixed	0.41
Developed land, sealed surface	0.41
Ornamental lake or pond	0.21
Mixed scrub	0.12
Bramble scrub	0.10
Other woodland; broadleaved	0.07
Developed land, sealed surface	0.03
Bracken	0.02

4.1.3 Habitat Creation

The landscape plans include the creation of new areas of woodland and grassland. A summary of habitat creation is provided in Table 3.

Table 3 Summary of habitat creation

Habitat	Area (Ha)
Developed land, sealed surface	4.04
Modified grassland	1.18
Vegetated garden	1.22
Other woodland; broadleaved	0.37
Other green roof	0.15
Ornamental lake or pond	0.12
Other neutral grassland	0.09
Introduced shrub	<0.01
Other woodland; mixed	<0.01

4.1.4 Habitat Enhancement

Approximately 0.62ha of modified grassland will be enhanced to other neutral grassland managed to achieve 'moderate' condition. Approximately 0.89ha of existing other neutral grassland will be enhanced from 'poor' to 'moderate' condition.

4.1.5 Offsite Areas

An offsite area within the land ownership boundary will be planted according to drawing BNG Offset Delivery Plan J00828-BNG-01. This area currently comprises modified grassland in 'poor' condition. The offsite planting includes:

- Enhancement of approximately 0.45ha of modified grassland to other neutral grassland managed to achieve 'moderate' condition.
- Creation of 0.137ha of mixed scrub, managed to achieve 'moderate' condition
- Creation of 2.237ha of other broadleaved woodland, managed to achieve 'moderate' condition.

4.1.6 Hedgerow Units

Approximately 0.24km of line of trees and 0.156km of native hedgerow will be lost to facilitate the development. This loss will be compensated by the creation of 1.61km of new tree lines and 0.36km of native species rich hedgerow.

4.1.7 Defra Biodiversity Metric 4.0 Results

Please see Appendix A and B for the proposed on-site and off-site habitats map and Appendix G for the BNG summary. The full Defra Metric 4.0 Spreadsheet is submitted separately. The Defra Metric Calculation values in units and percentages for the Site are as follows:

- Habitat Units Baseline: **55.58**
- Post Development Habitat Units: **65.48**
- Total Habitat Net Change: **+9.90**
- Hedgerow Units Baseline: **2.97**
- Post Development Hedgerow Units: **7.77**

- Total Hedgerow Net Change: + 4.01

The result is **19.09%** Habitat Unit increase and a **161.59%** Hedgerow Unit increase.

A Biodiversity Mitigation and Management Plan will be prepared to outline the mechanisms by which the net gain stated above will be achieved. This will include detailed planting specifications, management of habitat areas, monitoring (for species presence and abundance), with appropriate timescales to achieve the BNG condition of the habitats to be retained, created and enhanced both on and off-site. The plan will cover a 30 year post-development period which is a requirement of BNG through the Environment Act 2021.

5 CONCLUSION

The Defra Metric displayed a net biodiversity gain of 19.08% Habitat Biodiversity Value increase and a 161.59% Hedgerow Biodiversity Value increase.

The Biodiversity Net Gain assessment requires habitats for wildlife to be enhanced and left in a measurably better state than before the development and the calculation proves this can be achieved.

A Biodiversity Mitigation and Management Plan will be produced which will detail management prescriptions for the new and enhanced habitats. This can be secured through a suitably worded and enforceable planning condition.

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Date: 1 December 2023

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APPENDIX A – UKHAB SURVEY RESULTS



- Site Boundary
- g1c - bracken
- g3c - other neutral grassland
- g4 - modified grassland
- h3d - bramble scrub
- h3h - mixed scrub
- r1a eutrophic standing water
- u1b - developed land, sealed surface
- u1b5 - buildings
- u1c - artificial unvegetated unsealed surface
- u1d - suburban mosaic of developed/natural surfaces
- w1f7 - other lowland mixed deciduous woodland
- w1g - other woodland, broadleaved
- w1g7 - other broadleaved woodland types
- h2 - hedgerow
- r2 - rivers and streams
- w1g6 - line of trees

A	Updates Post-Development Habitats	28/6/2023
B	Updates Post-Development Habitats	1/12/2023

REV	NOTES	DATE
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CLIENT	Land and Development Advisory Ltd	
PROJECT	Ageas Bowl Redevelopment Detailed Ecology for Planning	
TITLE	UKHabs Classification Survey	

SCALE @ A3 1:3,000	CREATED BY CA	CHECKED BY MJ
REFERENCE J00765-002	ISSUE/REVISION B	DATE 1/12/2023

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APPENDIX B – POST DEVELOPMENT UKHAB MAP



-  Site Boundary
-  g3c - other neutral grassland
-  g4 - modified grassland
-  r1a - eutrophic standing water
-  u1b - developed land, sealed surface
-  u1b5 - buildings
-  u1c - artificial unvegetated unsealed surface
-  u1d - suburban mosaic of developed/natural surfaces
-  w1f7 - other lowland mixed deciduous woodland
-  w1g - other woodland, broadleaved
-  w1g7 - other broadleaved woodland types
-  w1h6 - other woodland, mixed, mainly conifer
-  h2 - hedgerow
-  r2 - rivers and streams
-  u1e - built linear feature
-  w1g6 - line of trees

A	Updates Post-Development Habitats	28/6/2023
B	Updates Post-Development Habitats	1/12/2023

REV	NOTES	DATE
-----	-------	------

CLIENT	Land and Development Advisory Ltd	
PROJECT	Ageas Bowl Redevelopment Detailed Ecology for Planning	
TITLE	Post-Development UKHabs Classification	

SCALE @ A3 1:3,000	CREATED BY CA	CHECKED BY MJ
REFERENCE J00765-003	ISSUE/REVISION B	DATE 1/12/2023

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- KEY**
- Ageas Bowl site boundary
 - Approx. extent of Thorneydown works forming separate application. For this information please refer to drawings J00979-GA-02 Landscape Treatments Plan and J00979-GA-01 Biodiversity & Mitigation Plan (Johns Associates)
 - Proposed planting areas with area references

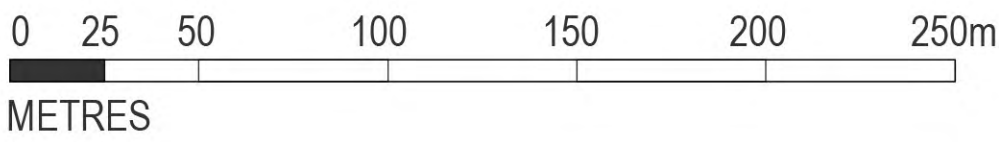
Proposed Planting Areas Summary
Total area (Areas A - M) = 14,815m²

Planting areas to comprise a mix of native tree and shrub planting comprising c.75% 1+1 60-80cm stock and 25% feathered stock at 1-2m centres depending on location.

Planting areas to incorporate larger specimen stock depending on location.

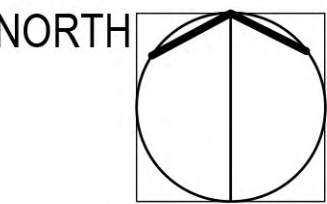
Typical mix of species to include:

- *Acer campestre* (field maple)
- *Alnus glutinosa* (alder)
- *Betula pendula* (silver birch)
- *Cornus sanguinea* (dogwood)
- *Crataegus monogyna* (hawthorn)
- *Fagus sylvatica* (beech)
- *Ilex aquifolium* (holly)
- *Lonicera periclymenum* (honeysuckle)
- *Pinus sylvestris* (Scot's pine)
- *Prunus avium* (bird cherry)
- *Prunus spinosa* (blackthorn)
- *Quercus robur* (oak)
- *Rosa arvensis* (field rose)
- *Salix ssp* (willows)
- *Sambucus nigra* (elder)
- *Sorbus aucuparia* (rowan)
- *Tilia europaea* (common lime)
- *Ulex europaeus* (gorse)
- *Viburnum lantana* (wayfaring tree)
- *Viburnum opulus* (guelder rose)



REF	NOTES	DATE
CLIENT	LAND AND DEVELOPMENT ADVISORY LTD	
PROJECT	AGEAS BOWL MASTERPLAN	
TITLE	BNG OFFSET DELIVERY PLAN	
SCALE @ A1	CREATED BY	CHECKED BY
1:2,000@A1	JH	MJ
REFERENCE	REVISION	DATE ISSUED
J00828-BNG-01	-	2023-12-01

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APPENDIX C– DEFRA METRIC 4.0 BNG SUMMARY RESULTS

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	9.90
	Hedgerow units	4.80
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	19.08%
	Hedgerow units	161.59%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Dyrham Park Country Club 9 Hole		Return to results menu	
Headline Results			
Scroll down for final results			
On-site baseline	Habitat units	106.47	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	128.58	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change (units & percentage)	Habitat units	22.11	20.76%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Off-site baseline	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	Habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	22.11	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
FINAL RESULTS			
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	22.11	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	20.76%	
	Hedgerow units	0.00%	
	Watercourse units	0.00%	
Trading rules satisfied?	Yes ✓		

6 APPENDIX B UPDATED LANDSCAPE/HABITAT PLANS

