

Additional Ecology response 11 1 24 F/22/93194 THE AGEAS BOWL, MARSHALL DRIVE,
WEST END, SOUTHAMPTON, SO30 3XH

Full planning application for the erection of 172 dwellings, a 71-bedroom care home (Use Class C2), a 142-bedroom hotel (Use Class C1), a well-being centre (Use Class E / F2), improvements to existing stadium, new vehicular access, car parking, pedestrian circulation, together with associated tree planting, landscaping, SuDS and biodiversity enhancements (Amended description)

Liz Harrison

11/1/24

A separate surface water drainage response is being prepared by Sarah Boyd.

Ecology

Ecology maintains an objection to this scheme due to

- **indirect impacts on woodland and habitats such as recreational impacts on Telegraph Woods,**
- **loss/fragmentation of existing woodland,**
- **reptile habitat to be retained and enhanced has not been identified**
- **direct impact on retained trees/ woodland (including root protection zones and overhead branches) and**
- **an insufficient SINC buffer zone which should not be included in public open space available for recreation.**

I have reviewed the following documents:

Response to Ecological Queries Raised (RTEQR) by Johns Associates (November/December 2023, no date on document). The sections are designated as EBC 1.1, 1.2, etc. and refer to points raised in earlier ecology responses.

BNG Assessment Technical Note by Johns Associates (November/December 2023 but no date on document)

Appendix E Reptile Survey Technical Note by Johns Associates (2021)

Amended Ecology Offset Plan by Calderpeel Architects (December 2023)

Amended DAS

Amended Proposed Site Plan

Amended Proposed Section Elevations

Amended Landscape Plans

Amended Landscape Plan Footpath Link To Telegraph Road

Impact on Telegraph Woods

The applicant has not demonstrated that there will not be significant recreational impacts on Telegraph Woods. There have been some previous discussions about an Access Management Plan to reduce potential impacts, but this has not been included in any of the amended documents.

In RTEQR (EBC Q 1.2) improved access to Telegraph Woods is mentioned, however the specifics of recreational impacts on Telegraph Woods, including the SINC, have not been addressed. The addition of 172 dwellings will have an increased impact on this area and will lead to further degradation. A coordinated access and circulation strategy including new or enhanced footpath/cycle routes has been mentioned, but this has not been presented as a document with an assessment of impact. The proposed hoggin path between the site and Telegraph Road would link to several informal desire paths on a steep slope. This would link that path to the wider path network in the rest of the woods and will increase the number of visitors (both residents of this site and visitors from neighbouring areas) entering the woods through this additional entrance point. The steep slope and informal desire paths will become dangerous with increased use.

The new fan zone areas would not address the recreational impact of site residents, as they are only proposed as gathering areas before a match, not recreational areas. EBC Q 1.20 Homeowner packs and information boards are proposed to be conditioned to mitigate potential recreational impacts on Telegraph Woods SINC, but this impact has not been properly assessed, so there is no evidence that this would be sufficient.

Loss/fragmentation of existing woodland

EBC Q 1.11 The latest landscape plans show Westwood Copse and the surrounding woodland is still significantly affected by a re-designed fan entry zone. In this proposal a small section of woodland would be isolated from the rest of the woodland by a wide paved walkway, limiting its ecological function. Westwood Copse contains mature sweet chestnut and hazel coppice stools and part of it is shown as a woodland on old maps dating back to 1892. Although it has been assessed as being in poor condition, this woodland is a feature that should be enhanced rather than lost to development and connected to existing habitat rather than separated from it. Green infrastructure along the northern boundary has the potential to be connected, with additional tree planting in this area rather than removal of trees. In the UK Hab technical note, section 3.2.1 it states that Westwood Copse has been reclassified as other woodland; broadleaved. The following sentence (*Two small sections previously identified as lowland mixed deciduous woodland and modified grassland following a Site visit in November 2023*) seems incomplete and does not explain what change was made to these areas.

EBC Q 1.12 The proposed pedestrian path would cause increased disturbance to the proposed area of remaining woodland. We objected to the removal of these trees in the previous proposals and maintain an objection to their removal in the current proposal. There are three trees with bat roost potential in this area.

Identification of reptile habitat to be retained and enhanced

The Ecological Impact Assessment Appendix E, Reptile Survey Technical Note (2021) reports on reptile surveys done in 2020 throughout the wider site including the golf course and Thorneydown Farm area. A low population of slow worms was found in September 2020 but not earlier in the survey season. The areas marked 1, 11 and 12 (in Figure 1 Reptile Survey Locations and Results plan, page 4) are relevant to this application. Slow worms were found in area 11 (proposed residential area) and area 12 (proposed northern parking, fan zone and stream re-alignment). Both of these areas have a southern aspect, which would be suitable for reptile basking areas but neither area would be retained in these proposals. The SINC buffer area may not be suitable as a reptile habitat due to shading, northern aspect and lack of basking areas. The amended landscape plan for Area 5 West does not show any retained reptile habitat planned along the northwestern edge of the residential area. The amended landscape plans for Area 1 East and Area 1 West do not show any retained reptile habitat planned along the edge of the car parks. Retained reptile habitat needs to be identified on a plan so that it does not get developed. Proposals for protection, mitigation, enhancement and connectivity with other suitable reptile habitat (ie. accessible habitat corridors) must also be included so that these populations of reptiles do not become isolated from populations in the wider site due to the proposed development.

Direct impact on retained trees/woodland

The proposed pedestrian path at the north of the site would increase footfall in and around the trees in Westwood Copse. The trees, their root protection zones and the woodland understorey would be impacted by more visitors directed to this area moving on and off site. There would be more pressure to prune the trees in this area to avoid branches falling on the footpath. Pathways into and through Telegraph Woods would be subject to similar pressure due to increased visitor numbers. Although the edges have been redesigned, the trees on the woodland edges surrounding the residential areas would still be impacted by this proposal.

Insufficient SINC buffer zone

I have reviewed the Amended Ecology Offset Plan by Calderpeel Architects (December 2023). As requested, this now extends the 20 m buffer along the full extent of the SINC boundary but only considers the same encroachments as the Superseded Ecology Offset Plan (July 2023). The % encroachment has been reduced because the total area has been extended, but this is not accurate.

According to the measurements on the amended offset plan this buffer would consist of 7580 Sq.m. The plan states that encroachment by the development into this buffer would be 397 Sq. m, or 5.2% of the total area. The amended plan shows that a section of the Ageas Bowl access road is also encroaching into this offset at the eastern end and this encroachment must also be included in the calculations.

From the proposed care home site heading west, encroachment into the buffer would consist of the full width of the site access road for more than 50 m along the southern road verge and at least 30 m on the northern road verge. This extends the full width of the 20 m buffer. Although this road is already on site and is not part of the new proposals it still accounts for encroachment into the 20 m SINC buffer and should be included in the calculations.

In addition, this area has been designated as public open space rather than an undeveloped woodland buffer zone. Benches are included in this area and the landscaping master plan shows that it would be planted and maintained as a meadow. The SINC buffer that extends towards proposed care home is shown as amenity grassland which would not provide a buffer for the woodland edge. There is also a line of dark green in this area which is not shown on the masterplan key at all.

A SINC buffer should be an area that protects the SINC from additional encroachment, planted for the benefit of wildlife rather than recreation. A large number of homes will still put recreational pressure on that buffer, so it must be planted to make it less accessible for recreation would be preferred. The buffer should be planted to reduce soil erosion on the slope down to the SINC, contain a variety of micro-habitats and vegetation heights, and provide sources of food and shelter for wildlife, such as flowers, seeds, berries and invertebrates. It could include hibernacula and thorny shrubs, and have a scalloped edge mown in to create basking areas for reptiles. Some of it could be planted as a wildflower meadow, but it should not be only a meadow, more diversity is needed. The Amended Landscape Planting Strategy shows some trees, a managed wildflower grassland meadow and proposed native tree and shrub mix along parts of the SINC buffer, but it is not clear that this extends around through the buffer towards the proposed care home (shown as amenity grassland and roadway) or in the western corner (shown as existing grass/understorey areas to be maintained).

If you are minded to grant permission the following conditions would be required:

A **Biodiversity Mitigation and Management Plan** can be conditioned to ensure that the biodiversity net gain proposed for this site can 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. This would include dark areas for foraging and commuting bats, and a wildlife sensitive lighting strategy.

Integral swift nest bricks will be incorporated into buildings in accord with the requirements of British Standard BS 42021:2022 Integral nest boxes which recommends 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. Prior to commencement, a detailed plan confirming the specific locations and numbers of swift bricks will be produced and approved by the local planning authority.

A **CEMP** containing precautionary working methods for protected species including bats, dormice, badgers and reptiles, and supervision by an Ecological Clerk of Works.

If trees with potential bat roost features must be removed, the soft felling method and preservation of the roost cavity as proposed in the Johns Associates response (EBC Q1.22) can be conditioned.

Badger surveys will be continued until completion of works, with precautionary methods being implemented unless a 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.

An S106 contribution of (amount to be determined) towards the delivery of a habitat and access management plan, in conjunction with the general management of woodland and heathland management of Telegraph Woods This would involve mitigation of the impact of proposed new residents at the site, and include fencing, path improvements and maintenance of these mitigations in perpetuity. This plan would be developed by the EBC Countryside team.

The main surfaced gravel path network within the SINC would need a stable and formal link from the proposed path to Telegraph Road. In addition, some of the paths are under water for part of the year due to a suspected collapsed culvert which blocks the flow of water from Telegraph Brook under this site so drainage would need to be sorted out before this work could progress.

Lisa Malter

Ecologist