

O/25/99506 Navigator Quarter

Ecology comments 12.3.26

Summary:

We have several ongoing concerns but with the careful wording of conditions, we are hopeful these concerns can be resolved at Reserved Matters and Discharge of Conditions stage. We can provide further advice regarding the wording of certain conditions.

We maintain our objection to the large reduction in width of the reptile corridor.

Some plans and documents need updating slightly. Further information is required regarding the Ecological Mitigation Strategy, potential raising of levels on the South Plot, the extent of the third party lease land regarding the reptile corridor and potential to reduce the road width to one lane with traffic signals to the north of the runway.

Surface Water Drainage

FRA and Drainage Strategy, Burrows Graham v6 22.12.25:

Part 1 Main report

Part 2 Supporting information: topography and utility survey plans, Geo2 contaminated land and geotechnical report (App C)

Parts 3, 4 and 5 Geo2 report appendices

Part 5/6 Drainage plans (App D) and maintenance (App F)

Indicative drainage Layout 1 (30228-BGL-XX-XX-SK-C-00012 Rev P10) and Layout 2 (30228-BGL-XX-XX-SK-C-00019 Rev P04)

Existing catchment plan 30228-BGL-XX-XX-SK-C-00020 Rev P02

[Please note, although the most recent revisions of the drainage layout are included in Appendix D of the report, the drawing number referred to within the main body of the report (section 5.6) and Figure 1 - illustrative masterplan (section 2.5) have been superseded and **need updating.**]

The drainage proposals have been significantly modified and have resolved our previous concerns. Four discharge points are now proposed which mimic the three existing catchments and have been located to conserve the surface water-dependent ecological habitats and features on and off site. Additionally, works are no longer required within the SSSI to enable connection to a receiving waterbody.

Although the drainage detail is not shown on the proposals at this stage, the report (section 5.16) states that three forms of filtration are proposed for surface water runoff and that 1 in 4 slopes will be incorporated on surface water features. Three

possibilities are outlined for the first form of filtration which are propriety system, filter drain or swale. Please note that natural forms of filtration for all three stages are preferred and propriety systems should be used as a last resort, although the use of a propriety system as an additional fourth form of filtration as proposed in the report would be beneficial to the quality of the discharge given the site's proximity to the Itchen SSSI and SAC.

We encourage source control e.g. pervious paving, rain gardens and green roofs, which increases the mimicry of the site's existing hydrology, and support its inclusion in section 5.5 of the report. These features can provide the first stage of filtration but only for the surface water which flows through them.

Layout 1 is our preferred option (cf. Layout 2) at this stage due to the reduced massing of buildings and therefore reduced impacts on the central scrub/ woodland belt.

Detailed drainage design must be conditioned for both the outline and full parts of the hybrid application. I believe the highway drainage proposals (full application) have not changed since our previous comments. Please note however that the drainage from the highway feeds into the drainage system of the north plot (outline application) where it must pass through a minimum of three forms of filtration. Therefore, any condition(s) must be suitably worded to ensure sufficient filtration is delivered for the highway at all stages.

Additional conditions should be included for:

- i. the submission of "as-built" drainage drawings post development.
- ii. detailed management/ maintenance plans for SuDS features to be submitted prior to commencement which also consider landscape and ecology habitat management requirements.

Please note that with regards to the potential of groundwater flooding, both Burrows Graham and Geo2 recommend groundwater monitoring be carried out prior to commencement of development. The LLFA will be able to advise further regarding this. Geo2 also recommends further assessment for the potential for contamination and extent of remediation.

General Development Layout

Illustrative site layout plans NQS-MSA-SI-XX-DR-A-2002 (Layout 1) and NQS-MSA-SI-XXDR- A-2005 (Layout 2)

Only the 20m buffer to the SAC and SSSI is shown. **The 20m buffer to the SINC also needs to be shown on the plan at this stage.**

Illustrative masterplan landscape sections 1001 Rev 02

The sections show the ground level of the South Plot are higher than the existing ground level. **Is ground raising proposed here?** Section C shows the ground sloping down towards the central scrub belt which changes the aspect of the scrub edge making it less hospitable for the invertebrate and reptile species currently using it. This is therefore an outstanding concern. Is this an error or can we impose a condition to limit this?

Ecology Response Letter (EPR, 16.2.26)

Regarding reptiles, the connectivity of their habitat remains a concern where the access road is removing the majority of the width of an important movement corridor. The width is reduced to approximately 2m at its narrowest effectively creating a barrier to movement. It is appreciated that the alignment of the road cannot change but **has a reduced road width (to one lane with traffic signals) been discounted with justification provided?**

Although discussions are in place regarding a third-party leaseholder to secure the strip of land immediately to the north of the red line boundary for reptile habitat, there is no guarantee this will be successful and the application will need to be determined assuming this will not be secured. Therefore, we **maintain an objection to the loss of reptile corridor habitat.**

If permission is granted, enhancement of the retained habitat will need to be carefully designed (conditioned) to encourage movement of reptiles through the pinch point and ensure no obstacles to movement are present (such as excessive shade, oversized structures or over-exposed land). There is no guarantee this will work however, and the applicant must pursue negotiations with the leaseholder of the land to the north, although I am not sure of an appropriate mechanism within the planning system which will ensure this does happen.

Regarding the extent of the third-party leaseholder land, the land shown on Map 1 Map of Reptile Corridor Area shows the corridor stopping short of connection to habitats to the west. This therefore appears to provide an incomplete corridor which seems to defeat the point. This may be a drawing error but **please can clarification and justification (which is not currently apparent) be given.**

The proposed acoustic barrier truncates the wildlife corridor which runs from the north of the runway and between the two building plots. Without careful design, the barrier will also be a barrier to the movement of wildlife. **Detailed design of the acoustic barrier must be conditioned** to ensure that the barrier is permeable to wildlife.

Parameters Plan NQ-MSA-SI-XX-SDR-A-2001 Rev PL06

This has been revised slightly and is improved in terms of provision of green infrastructure at the perimeter of the outline application area.

The plan shows the strategic landscape areas that will not be developed if the outline application is granted. In reality, the landscaped area is likely to be greater than shown on the parameters plan and encroach into the South Plot and North Plot development area as shown on the indicative layout, it just cannot be shown yet as the layout is not yet fixed. The parameters plan therefore shows the minimum amount of landscaped areas (including ecology habitats) that will be provided. Note, the on-site post development BNG provision plan supports this as the habitats extend into the development areas shown on the parameters plan.

A larger undeveloped area has been provided at the north-east of the site which is welcomed as this is a popular area for bats (including grey long eared).

Shading of habitats, particularly of the central scrub belt, is still a concern as the majority of the South Plot proposed building height is 35.95m AOD and 32.28 AOD for the North Plot (current ground level approx. 11m AOD). Heavy, prolonged shade (with the potential of completely unbroken shade at this site) on adjacent habitats will have a detrimental effect on the plant and animal species within it, such as reptiles, invertebrates and birds.

Layout 1 is preferred to layout 2 as there is less massing of the buildings and therefore will allow relatively more light and heat to reach the central scrub belt. It also retains a more open nature of the scrub belt as doesn't confine it within a continuous barrier.

If the parameters plan remains unmodified, it may be possible to prevent the massing of buildings and excessive shading of retained and created habitats by applying a **suitably worded condition** to any permission granted.

BNG

The metric has been updated and clarification has been given for the classification of scrub habitat. There is a 70.4% biodiversity net loss on site and 169.35BU are required offsite. Because the layout has not yet been fixed for the outline part of this application, these figures may need to be refined slightly as the scheme progresses.

As this is a hybrid application, it may be appropriate to consider the application as a whole and use a phased approach to BNG considering the delivery of the access road (full permission) to be the first phase of the development.

The BNG habitats to be retained and created on site are "significant" and therefore a monitoring fee of £16,797 will need to be paid to EBC which will be secured via a s106.

Conditions:

1. Overall Biodiversity Gain Plan in line with already submitted metric and plans to be submitted and approved prior to commencement. Phased Biodiversity

Gain Plans to be submitted and approved with each phase prior to commencement.

2. HMMP to be submitted and approved for each phase prior to commencement of each phase.
3. Evidence of purchase of off-site biodiversity units prior to commencement.
4. Notice to be given to the LPA once the onsite habitats have been completed.

We can provide more detailed wording of the conditions. [PAS Template Phased BNG Condition v1.0 April 2025.docx](#)

LEMP

A LEMP is required for any landscape areas and habitats which are not within the 30-year BNG contribution and also to provide ongoing management specifications for all habitats and landscape for the lifetime of the development. There should be cross-references made to the HMMP which will provide more prescriptive and corrective management for the BNG habitats. **A detailed LEMP should therefore be conditioned.**

Ecological Mitigation Strategy

Ecology Response Letter (EPR, 16.2.26)

The letter refers several times to an (ecological) mitigation strategy being within the application documentation. I cannot not locate this document. **Please can it be forwarded** so it can be cross-referenced with the details in the letter.

Enhancements for species

Condition: Details of enhancements for species, including reptiles, dormice, birds, invertebrates and bats, will need to be submitted and approved prior to commencement. Details must include the types, numbers, locations (shown on a plan) of enhancement.

Note that off-site provision for skylarks must also be addressed within the details.

GCN

The applicant is entering the District Licence for the site. Please refer to the **conditions recommended by NatureSpace.**

CEMP

I believe no further changes have been made to the CEMP since our previous response on 30.1.26. **Detailed CEMPs for each phase must be conditioned.**

Protection of trees and other habitats during construction

Given the level of detail potentially required, an additional and **separate condition** may be required to minimise damage to retained trees and other habitats during construction. This would detail appropriate methodologies to be put in place, for example, protection of woodland/ scrub habitat during the installation of the drainage outlets. The tree officer is likely to have advised on this matter. I don't have a preference where it is included, as long as it is covered somewhere.

Lighting -operational phase

A **condition** must be put on any permission granted to ensure there is no light spill into adjacent habitats and that wildlife sensitive lighting specifications (such as colour temperature and wavelength) are used. This applies to both the full and outline parts of the application. Suitable wording can be provided.

Noise – operational phase

No further information regarding noise impacts on ecological receptors has been submitted therefore **previous comments still stand**. An acoustic wall has been proposed adjacent to the access road to minimise noise impacts on the residential area 70m to the north-west of the road. Ecological receptors are adjacent to the road. Noise levels at source (at the road) have not been provided. Additionally, the noise levels generated at the units are unknown as it is not yet known what the operations and processes are going to be.

The detailed CEMP will provide restrictions and limit noise levels during construction but noise restrictions and limits must also be placed on the development during its operational lifetime to ensure adverse impacts on the local ecology do not occur. The 20m buffer to the SINC, SSSI and SAC will only be sufficient if noise is kept to a reasonable level on site. Additionally, noise impacts must be reduced on other non-designated ecological receptors on and adjacent to the site.

A **condition** with a specified noise level restriction during the operational phase could be applied to any permission granted but this may be difficult to quantify at this stage given so many currently unknown variables and potentially could be too constraining. An alternative approach could be more in line with that recommended in EPR's Ecology Response Letter which, via condition, assesses the impact (on all ecological receptors) and subsequently determines and imposes measures to control and minimise noise to reduce/ remove the impact (on all ecological receptors). Dealing with this at Reserved Matters stage will address the noise impacts of the outline application only. Further information is still required regarding the access road (full application part) which could potentially be dealt with via condition.

Air Quality

Please see my most recent comments with the suggestion of **a condition** sent via email to Liz dated 26.1.26.

Sarah Boyd

Ecologist