

Planning Application

MOORLANDS FARM, BOTLEY ROAD, WEST END, SOUTHAMPTON, SO30 3HD

Representative	Address	Comments
Andrew Finnegan	5 SEPTEMBER CLOSE WEST END SOUTHAMPTON SO30 3BE	The area of Moorlands farm is a "brownfield site" and whilst I do not object to the redevelopment of the farm yard area. I wish to make the following comments. The developer has put a live on-site manager to oversee the abandoned buildings I understand this was to prevent continued vandalism to the farm building site. However, I do not know if this was with planning permission for the large mobile homes now on site. This "caretaker" of the site has noticeable caused damage to the adjacent SSSI of Moorgreen Meadows. Trees have been removed and many tracks have been created by the movement of vehicles over sensitive areas I believe this shows the lack of respect for the SSI from its current owners I have no confidence that the farm area will be redeveloped without a continued knock-on effect on the SSSI. I feel that this continued lack of respect and understanding and sensitivity for the SSI is something they should be held accountable for. I believe their actions. is a move to at a later date to try to extend developments into this area. Given the owner's actions to date, I have no confidence that the development of the farm will pay anything more than lip service to the environmental impact and responsibilities of the site. A comment on traffic is the stated volume of traffic to the site. West End Village is already congested as are the roundabouts from the Motorway. Can Botley Road really cope with the increase in traffic turning into the proposed development?
George Baker	6 SHAFFORD MEADOWS HEDGE END SOUTHAMPTON SO30 4SU	Moorlands Farm Industrial Development Application: F/22/93835. Summary: The Environment Impact Assessment (EIA) section 7.2.1 states that due to the close proximity of Moorgreen Meadows SSSI (along the site S, E and N boundaries), there is potential for it to be significantly impacted through dust deposition and surface run-off/drainage. Therefore, there will be a likely significant negative impact at a national level. In addition, the EIA section 7.2.1 states the development will result in a likely significant adverse impact upon habitat of value at the local level. Having identified these risks the applicant fails to address all of these matters in the EIA and fails to provide mitigation to offset these impacts. As such, this development application contravenes EBC's Policy DM11 entitled Nature Conservation and as such the development should be rejected. Objection 01: Incomplete Habitat and Species Surveys. The Executive Summary of the Environment Impact Assessment (EIA) states that the adverse effects of this development can only be fully determined following the completion of recommended additional survey work. This lack of survey work and the associated habitat assessments contravenes the acceptance criteria of EBC's Policy DM11, Nature Conservation, item 8, entitled Surveys and as such the application must be rejected. Objection 02: Impacts on Moorgreen Meadows SSSI. This development has the potential to impact on Moorgreen Meadows SSSI, particularly unit 3 which is classified by Natural England on their website as in an unfavourable condition and is under a High level of threat. The citation warns of further damage due to changes in drainage, erection of buildings and engineering works. The EIA does not provide a current assessment of the SSSI, nor does it address the management advice provided by Natural England. This omission contravenes the acceptance criteria of EBC's Policy DM11, Nature Conservation, item 4 entitled National and Local

		Designations and as such the application must be rejected. Objection 03: Incomplete Habitat and Species Surveys. The sward in Moorgreen Meadows SSSI is of scientific importance for its populations of marsh orchids, including examples such as northern marsh orchid, <i>Dactylorhiza purpurella</i>, along with other species of <i>Dactylorhiza</i>. On this site can be found hybrids between many species of marsh orchid, making it a centre of micro-evolution. The field surveys and subsequent habitat assessments detailed in section 3.2 of the EIA fail to address these features as such this contravenes the acceptance criteria of EBC's Policy DM11, Nature Conservation, item 8, entitled Surveys and as such the application must be rejected. Objection 04: Protected Species- Grass Snakes. Table 6 of the EIA confirms the site holds good numbers of Grass Snakes; therefore, we must assume the site holds good numbers of amphibians, particularly frogs. The watercourse along the eastern boundary of the site and Pond 4 are considered high value biodiversity areas with high potential for reptiles, amphibians, and invertebrates however the applicant has failed to complete comprehensive surveys in these areas. Pond 4 assessment is based only on a desk top HIS study. The aim of the protected species surveys is to confirm the presence/likely absence of species to aid the assessment of the ecological value of the site and potential ecological effects (or lack of) of a proposed development. The results of the survey work also provide evidence to support associated mitigation and compensation. This lack of surveys contravene the acceptance criteria of EBC's Policy DM11, Nature Conservation, item 5, Priority habitats, protected and priority species and the local ecological network and as such the application must be rejected. Objection 05: Water Pollution during construction phase. The EIA in section 6.1 states that all protected species and habitats within the development footprint and the boundary have the potential to be disturbed by the earthworks and earth stripping associated with the phased construction but these adverse impacts are not considered in the assessment of water pollution risks particularly to the watercourse and SSSI along the eastern boundary of the site. Considerable damage to the local biodiversity could be done during the construction phase yet these matters are not considered. The one sentence reference to the production of a CEMP in 8.9 is wholly inadequate mitigation to the significant impacts to the local biodiversity during the construction phase of this development. This failure to address the adverse impacts of construction and the lack of mitigation contravene the acceptance criteria of EBC's Policy DM11, Nature Conservation, item 5, Priority habitats, protected and priority species and the local ecological network and as such the application must be rejected. Objection 06: Water Pollution during the Operational Phase. The EIA addresses the human activity and disturbance impacts of the development during the operational phase on the local biodiversity but fails to consider the impacts of water pollution, particularly to the adjacent watercourse and SSSI. The Flood Risk Assessment report section 7.4 states that 50% of water runoff will be discharged directly into the local watercourses. Considering that this development will include light industrial facilities including storage areas serviced by heavy duty vehicles, there is considered risk of water pollution into this watercourse which feeds into the Hamble River. None of these issues are considered in sections 6, Zone of Influence, section 7 Likely Ecological Impacts, nor section 8, Mitigation. As such the EIA completely fails to address the impacts of water pollution during the operational phase of this development. This failure to address the adverse impacts of water pollution during the operational phase contravene the acceptance criteria of EBC's
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		Policy DM11, Nature Conservation, item 5, Priority habitats, protected and priority species and the local ecological network and as such the application must be rejected. Objection 07: Inadequate Buffer Zones. The applicant has failed to provide sufficient buffer zones between the development and Moorgreen Meadows to provide protection from noise, light, and air pollution disturbance to the breeding birds and mammals that use this area, particularly along the eastern boundary. This failure contravenes the acceptance criteria of EBC's Policy DM11, Nature Conservation, item 7, entitled Buffers and as such the application must be rejected. Objection 08: Landscape and Ecology Management Plan. The EIA in section 8.3.5 recognises the need for funding and a management plan covering the habitat monitoring and subsequent management of the receptor site to ensure the mitigation measures are effective on a long-term basis. The scope of this management plan should be extended to cover the monitoring of all mitigation measures implemented to offset the adverse impacts of this development. The applicant has not submitted a management plan as part of the application. This omission contravenes the acceptance criteria of EBC's Policy DM11, Nature Conservation, item 4 and the principles detailed in item 5.77. As such the application must be rejected.
George Baker	6 SHAFFORD MEADOWS HEDGE END SOUTHAMPTON SO30 4SU	We have sought an expert opinion from Hampshire and Isle of Wight Amphibian and Reptile Group (HIWARG) on the proposals contained in the EIA covering the capture and relocation of the grass snakes recorded on the development site. HIWARG comments as shown below confirm our view that the EIA proposals are insufficient to mitigate the adverse impacts of this application in regard to the grass snake population. Of particular concern is the timing and preparation of the relocation sites, the provision of nesting piles and the need for a long-term monitoring and management plan. As such, we believe the proposals contravene the acceptance criteria of EBC's Policy DM11, Nature Conservation, item 5, Priority habitats, protected and priority species and the local ecological network and as such the application must be rejected. Hampshire and Isle of Wight Amphibian and Reptile Group (HIWARG). Statement on Moorlands Farm Planning Application F/22/93835. It's good that you are objecting to the development. This is the main threat to reptiles in the UK. There is little evidence to suggest that reptiles do well after these types of relocations, and this is largely due to the lack of post-monitoring after the project has been completed. I see that they plan to reduce the vegetation from September-February. Well, grass snakes emerge in February if it is warm enough and I have seen grass snakes out in early February over the past 3 years. February is becoming a warmer month than it should be in recent times, likely due to a warming climate. If the snakes emerge from their hibernacula at this time of year and there is little vegetation for them to hide in, then they will be (unfairly) more prone to predation. I think they need to identify potential hibernaculum locations through early-season surveys. Reptiles are more spatially aware than most people realise and will often return to the same hibernaculum each year. If that suddenly disappears, they will find it difficult to find cover for the winter. With grass snakes, they will need access to a pond and good

		amphibian populations in order to feed. I see that there is a footpath between the relocation site and the nearest pond (unless there's smaller ponds not labelled on the map). Snakes don't like to move through open areas often and the footpath may cause some resistance in those relocated snakes reaching that pond, especially if there's impermeable fences. I think it's important to stress to them that the original population can never be replaced, no matter how many methods and protocols they follow. This is the case for all reptiles in the UK. I noticed that they are implementing wood-based hibernaculum on the receptor site, which is good. However, I think more compost heaps/grass piles should be implemented there as well with the grass snake's unique tendency to lay eggs in compost heaps/decaying vegetation. The ecologists should know how to do this (you would hope!). I have to say, I'm surprised that they have been able to develop on a SSSI like this. I guess the only positive is that they're not moving the reptiles over a great distance and still within the SSSI. The report doesn't seem to indicate if the receptor site is connected to corridors of suitable habitat for reptiles? This is key in the long-term health of the grass snake population and is one of the main problems that reptiles face in this country - fragmentation and low genetic diversity. Keep me updated on this.
Peter Sillence	105 CHAPEL ROAD WEST END SOUTHAMPTON SO30 3GQ	Dear Ms Sharpe, I would like to comment on the planning application at Moorlands Farm, Botley Road, West End. The previous application O/21/91192 was undoubtedly likely to be detrimental to the condition of Moorgreen Meadows SSSI, which is immediately next to the development site. This application appears to have been more thought through and appears somewhat less harmful. There seems to be greater concern about run-off into the stream and some attempts to enhance the site from a wildlife point of view. The farmyard does need to be cleaned up, being in a very derelict state with much rubbish and old dilapidated buildings, some containing asbestos. However, I am still very concerned about more development so close to the SSSI. My most urgent concerns are as follows:- 1. The effect of demolition and rebuilding on wildlife found on the site. There are known to be a population of reptiles on the site, including Grass snakes and Slow worms. I have also recorded Bats on the site and SSSI with my Bat detector. These may be roosting in the old buildings. 2. I am still concerned about the possibility of oil and chemical run-off from industrial unit to be built. The stream borders and runs through the SSSI. 3. The effect of more building on the drainage of the SSSI. The SSSI is important for, amongst other things, marsh orchids. These are dependent on wet meadows. It has already been affected by the building of the M27, Tollbar Way and the industrial units along Wellington Park. The site should be monitored to ensure the drying does not accelerate. 4. The 'Site manager' employed at the farm appears to be unaware of the sensitive nature of the SSSI and seems to be causing damage by driving all over the Meadows and felling random trees. This does not inspire confidence that the Development Company has the best interest of the SSSI at heart. 5. The effect of more traffic to the area. The Partnership for Urban South Hampshire: Air Quality Impact Assessment (PUSH) carried out for local authorities including EBC included a study of pollution affecting Moorgreen Meadows SSSI. It measured Particulates, Acid deposition, NOx and Ammonia. The summary for Moorgreen

		(pp116-117) concluded that all 4 pollutants exceeded the threshold and likely significant effects could not be ruled out. Further assessment was recommended. It stated that the SSSI contained notifiable features sensitive to road traffic. The report appears to show that the SSSI is one of the worst affected sensitive sites in S. Hampshire. Since the study, levels of traffic on the M27 and Tollbar way have continued to rise and developments in progress and planned at Boorley Green, One Horton Heath and Berrywood Business Park will only make matters worse. What was the point of the Council sponsored study if no action is taken? 6. I am concerned that other land next to the SSSI might still be considered as possible development sites by EBC. In the previous Local Plan the Strategic Land Availability Assessment study showed that the EBC would consider allowing building on other fields next to the SSSI notably SLAA-11-12C, SLAA-11-10C and SLAA-11-8C. I hope that this is not still under consideration. The SSSI is becoming isolated from surrounding countryside further development will cut wildlife corridors essential for its continued health and ecological value. Thank you for considering these comments.
George Baker	6 SHAFFORD MEADOWS HEDGE END SOUTHAMPTON SO30 4SU	Moorgreen Meadows SSSI. F/22/93835. I object to this application on the grounds that the applicant has failed to recognise the significant importance of the Site of Special Scientific Interest (SSSI) of his land that aligns directly with the eastern border of the development site. The application documents make frequent reference to the SSSI as 'outside of the application' however the construction, operation and maintenance activities will have a likely significant negative impact at a national level on the site and further degrade the area which is currently assessed by Natural England as in an unfavourable condition and is under a High level of threat. As the owner of the SSSI, the applicant has direct responsibility for this designated area. As such, this application should not be approved until the applicant fully recognises his responsibilities in regard to the SSSI and provides a detailed management plan that addresses the adverse impacts of the development and a clear and precise commitment to bring the SSSI up to a favourable condition.