

DC/24/96723 Land adjoining Pinewood Park

Ecology Response 28.2.24

Condition 5 SuDS

Insufficient treatment:

The site currently provides no treatment of surface water run-off prior to discharge to a watercourse. A proposed proprietary treatment system is mentioned on page 20 of the Flood Risk Assessment and Drainage Strategy Report (Arch Associates, Jan 24) but no further details are provided within the report or are shown on the Drainage Strategy Plan FHL016-AAL-XX-XX-DR-C-0500-P03 and Drainage Strategy Plan Surface Water FHL016-AAL-XX-XX-DR-C-0512-P01. Please note that attenuation tanks and flow controls do not provide any form of treatment, they only control the rate of discharge.

On sites of this size, we require two forms of naturalised filtration. Unfortunately achieving any naturalised form of filtration on this site is limited without further extensive tree and woodland habitat loss.

A solution could be to install pervious paving on the driveways and other paved surfaces and ensure that all surface water runoff from hard surfaces (including roofs) flows through the pervious paving prior to flowing through a proprietary treatment system. Although not naturalised, this would achieve two forms of filtration. Pervious paving must be included in the drainage strategy document and plans as it is a critical component of the site's SuDS. It must also be clearly shown how the pipe network (including down pipes) interacts with the pervious paving (including cross-sections) to ensure the system's successful function. (Note, the ACLA BUE 01 Landscape Plan shows the driveways as pervious).

Further tree loss due to the installation of surface water infrastructure:

The installation of the attenuation tank will result in unacceptable further tree loss (beyond that previously agreed) and must be relocated. (Note, the ACLA BUE 01 Landscape plan shows a more appropriate location for the attenuation tank).

It is not clear where the receiving off-site watercourse is and this must be shown on a plan. The physical installation of the surface water infrastructure from the attenuation tank to the discharge point at the watercourse has the potential to cause significant further tree loss both on and off site. Further details regarding this, including mitigation of any effects, must be provided.

Condition 4 Site Details: Landscape

ACLA/ BUE 01 Rev B Landscape Proposals

One of the changes made since the RM application include a 1.2m post and wire fence around the perimeter of the site, replacing close board timber fencing. Although there's no guarantee that the

area of woodland habitat within the private gardens will be retained, the wire fence at least offers more ecological connectivity between the woodland habitat on either side of the divide, than the close board fence would have done thus reducing the negative ecological effects of isolation. Can more details of the type of wire fencing be provided please? The less wire there is, the better it is for ecological connectivity and movement.

More hedgehog gaps in the close board fencing between the private gardens must be provided.

Another change is that the perimeter native hedgerow has been extended around Plots 3 and 4. The hedgerow planting must be located on the far side of the fence (outside of the private gardens) to increase the chances of its retention. The perimeter hedgerow may have trouble establishing in the lower lighting levels under woodland canopy, however, it is worth attempting given the limited opportunities for planting on this site to compensate for the substantial loss of woodland habitat to facilitate the development. That being said, it is not clear if any additional clearance of established/ significant vegetation would be required to facilitate this planting. This must be avoided as it would cause additional harm and could outweigh the benefits. Please can clarity on this be provided.

There has also been a reduction in the number of replacement trees since the RM application, notably along the western boundary. What is the reason for this reduction? The number of trees lost to facilitate this development, already massively outnumber those being planted and any appropriate opportunity to replace these losses must be taken.

Please note, the inconsistencies between the drainage plans and the landscape plans regarding location of drainage infrastructure and type of surfacing. The two sets must be consistent to prevent avoidable habitat losses on site. The root protection zone shown (the alignment of the Heras fencing) also needs to be moved to protect all trees previously agreed to be retained (notably in Plots 1 and 2).

Condition 8 CEMP

Construction impacts on fauna:

I have significant concerns regarding the potential harm of fauna (e.g. reptiles, nesting birds, dormice, badgers – all within the area) on this site during construction and the lack of mitigation proposed. Unfortunately, Ecology was not consulted at the outline stage and the ecological survey information submitted at that stage was incomplete. The only ecological surveys I have found associated with this application are an extended phase 1 habitat survey (July 2014, submitted at outline) and a bat roost tree assessment (September 2020, submitted for the RM). A PEA has not been carried out for this site at any stage and therefore further phase 2 surveys were not recommended nor have been carried out. There is the potential for protected species to be on site and measures must be taken not to harm these during construction.

Usually, the applicant is required to carry out a walkover update of the PEA survey prior to construction, when a significant amount of time has elapsed since the previous survey (surveys usually remain valid for 2 years), to ensure the habitats on site have not changed significantly. Considering this was not carried out in the first place, this must be carried out now prior to construction. Although this will not change the approved layout of the development, it will identify mitigation requirements which must be implemented during construction to avoid harm to any protected and noteworthy species present. The recommendations within the bat roost tree assessment remain valid.

Tree protection:

Construction Management Plan Rev B

The extract from the tree protection plan shows that Heras fencing is not protecting all of the trees previously agreed to be retained (e.g. Plots 1 and 2). This needs to be corrected to ensure the protection of all retained trees.

Dust management:

In addition to residential areas, the ecological habitats which surround this site are sensitive receptors and therefore any dust generating activities must also be controlled to protect these areas.

Spillages:

The ecological habitats which surround this site are sensitive receptors and therefore measures must be taken to reduce the risk of damage to these areas. Chemicals/ potential pollutants must be kept away from these areas.

Temporary lighting:

None currently proposed.

Surface water management:

Recommended Environmental Protection Measures (Appendix 1 of CMP)

Silt and other pollutants carried in surface water runoff from construction sites can be extremely damaging to all habitats not just to watercourses. A silt fence with two lines of straw wattles is proposed to protect the watercourse to the north of the site. However, the location of this silt fence and wattles must be located within the Heras fencing boundary (i.e. the limits of construction activity). This therefore will protect the adjacent retained on-site and off-site woodland habitat from silt and other pollution generated within the construction area. A plan must be submitted showing the location of this fencing.

Sarah Boyd

Ecologist