

Ecology response amended for F/24/97217 UNIT 2, ALPHA PARK, ELECTRON WAY,
CHANDLER'S FORD, EASTLEIGH, SO53 4BX

Erection of 1no. industrial storage building (Use Class B8)

Clare Martin

20/6/24

I have reviewed the email from Alex McLaren, Planner (19 June 2024). He has written:

In relation to the points on ecology, the policies which are quoted do not apply in this case as Planning Practice Guidance is clear that BNG relates to existing habitats within the development site. There are no habitats or natural features whatsoever present in the development site and the small triangle of grassland referred to in the comments is outside of the development boundary. The purpose of BNG is to offset any impacts which a development will have on biodiversity or habitats on site and as such, in cases like this where the baseline biodiversity value of the site is zero and no habitats will be impacted, a net gain is not applicable.

BNG is used to refer to the requirement for 10% biodiversity net gain required by the Environment Act (2021). Alex is correct that the baseline value of the immediate site is zero, for the purposes of that legislation, however our local plan policy DM 11 and the National Planning Policy Framework paragraph 180 still apply to require some biodiversity enhancements regardless of whether or not there is any existing habitat. Enhancements either on the development site or immediately adjacent but within the ownership of the applicant (within the blue line boundary) can be conditioned and this can be a post-completion condition if that is acceptable. I am happy to take a pragmatic view, however there is pressure to decrease the resources available to wildlife in favour of development and as a local government ecologist I am tasked with finding opportunities to increase biodiversity within the Borough whenever possible.

If enhancing the planting of a small triangle of land is not acceptable, we could consider the use of rain garden planters with flowering plants for pollinators along the western edge of the building as a biodiversity enhancement. Planters would need to be watered during dry periods, which would not need to be done for the enhanced triangle of grassland after plants became established.

The small text on the Site Drainage Plan by Invincible Drain Care (10/08/2018) is not legible. From my perspective the drainage inspection and repairs can be a post-completion condition if that is acceptable to the planners. The watercourse that runs to the north of this site flows into the Monks Brook, which is a tributary of the protected waters of the River Itchen SAC. Local Plan Policy DM 6 notes that all receiving waters in the Borough should be classed as protected waters. The runoff from an industrial estate has potential to contain pollution hazards (see CIRIA SuDS manual part E page 568-9) and we need to ensure that these are adequately mitigated by a well-designed and well-functioning surface water drainage system.

Lisa Malter

Ecologist

22/5/24

Ecology/Biodiversity enhancements

Although there are records of bats nearby, the aerial photos available on Google maps show that it is not likely for bats to be foraging in the immediate area of the proposed building.

According to DAS Section 5.26, the translucent roof allows for light transmission, so while this building presumably would not need to use lighting during daylight hours, interior lighting, when used could illuminate the area around the building if used during hours of darkness. Given that the site's operating hours are between 8:00 and 16:30, this would not be significant during the spring, summer and autumn months when bats would normally be active.

Although this application is exempt from providing statutory 10% biodiversity net gain, some biodiversity net gain will be required in in accord with Local Plan policy DM 11 and NPPF paragraph 180.

The small triangle of grassland with one small tree within the blue line boundary to the south of the proposed building can be enhanced. This can be achieved by planting low maintenance flowering native shrubs (such as spindle, Guelder rose or flowering currant) to attract pollinators and provide fruit for wildlife. The area will be partly shaded by the existing building in the morning but will receive sun in the afternoon. A biodiversity enhancement and management plan (BEMP) can be conditioned.

Surface water drainage

The submitted drainage inspection report by Pipe View (2016) listed at least four defects with warnings of collapse and future deterioration and one area that was in acceptable condition at that time. It is not clear whether this report would apply to the area proposed for the new storage building but if the drainage on site has faults they must be repaired before adding an additional building to the site.

The Roof Drainage Plan and Sections by rwpclearflow does not appear to have a date, and is stamped as fitted. This appears to show downspouts and gutters (with leaf guards and internal baffles) fitted to the longer sides of the building.

There is an attenuation cells building manual by Solutek Environmental (2017) with maintenance for the existing system , a storm drainage building manual by Bericote for rwpclearflow (June 2017)

As this building is proposed to be added to existing hardstanding, I don't think there would be an increase in the amount of surface water drainage or a change in water quality. However it is still not clear where the surface water drainage from the gutters and downpipes for this building would be routed.

I need to review a plan showing the locations of the existing drains in context of the proposed building and a brief explanation of how water would be channelled into the

existing system. I also need evidence that the drainage system faults reported in 2016 were repaired or replaced before an additional building can be added to this site.

Lisa Malter

Ecologist