

F/24/97844 River Itchen Water Treatment Works, Allington Lane

A new permanent building to house a centrifuge; alongside a balancing tank, sludge cake skip and adjacent hard standing for temporary pallet storage

Ecology Comments 11/9/24

General

The site is just over 100m from the River Itchen SSSI and over 140m from the River Itchen SAC designation. The Portsmouth Water Company Lagoons and Woodland SINC is over 40m away. Given the scale of the development and distance from the SAC, an HRA is not required.

Biodiversity Net Gain

A 13.94% BNG (as shown in the submitted metric) is proposed to be achieved through the enhancement of 0.091Ha of Other Neutral Grassland (ONG) (polygon B1 on the submitted UKHab plan) from poor to moderate condition. Please note, 17.19% is stated in the BNG Covering Letter which is incorrect. The on-site post development habitat (both the retained and enhanced habitat) is a “significant” habitat and therefore must be monitored.

The application does not include a baseline condition assessment or provide much information on how an enhanced condition of the grassland will be achieved and maintained, although the Planning Statement (SLR Jul 2024) states that a mowing regime and wildlife friendly planting will increase the number of plant species. This information is an EBC requirement at validation.

However, from the plant species and distribution described in the submitted Ecological Assessment, we can agree that the current condition of the ONG is poor and given the low difficulty level for enhancement of the ONG from poor to moderate condition, we can say with reasonable confidence at this stage that this enhancement will be achievable with appropriate management. Please note, we currently are not taking fees for the monitoring of significant habitats, and therefore a S106 is not required. Therefore, bearing these factors in mind and given the simplicity of this site, as an exception, we can place conditions on any permission granted for the submission of a Biodiversity Gain Plan [Biodiversity gain plan \(publishing.service.gov.uk\)](#) and a Habitat Management and Monitoring Plan (HMMP) [Habitat Management and Monitoring Plan Template - JP058 \(naturalengland.org.uk\)](#)

The HMMP must include information about the existing management of the site and how the proposed BNG habitats will be retained, enhanced, managed, maintained, monitored, funded and reported on to the LPA. Monitoring will begin once the development is complete and must run for a minimum period of 30 years. The LPA may issue a habitat completion certificate or statement of conformity which will show the start date and finish date of the monitoring period. As standard, monitoring reports following completion are expected to be submitted to the Council during years 1, 3, 5, 10, 15, 20, 25 and 30, unless otherwise agreed. Management

responsibilities and a methodology to ensure the submission of monitoring reports must also be included.

Recommended BNG conditions:

1. The development shall not commence until a **Biodiversity Gain Plan** is submitted and approved by the LPA in accordance with paragraph 14(2) of Schedule 7A of the Town and Country Planning Act 1990 and shall be implemented in accordance with the approved details. The Biodiversity Gain Plan shall be prepared in accordance with Statutory Biodiversity Metric and Biodiversity Net Gain Covering Letter both dated 9 July 2024 and prepared by SLR Consulting Limited, unless otherwise agreed with the LPA.
2. The development shall not commence until a **Habitat Management and Maintenance Plan (HMMP)**, prepared in accordance with the submitted Biodiversity Gain Plan, has been submitted to and agreed in writing by the LPA along with a timetable for implementation. Thereafter those habitats shall be managed and maintained in accordance with the approved details for a minimum period of 30 years following completion.
3. Notice in writing shall be given to the LPA when the: a) habitat creation and enhancement works as set out in the HMMP have commenced, and b) habitat creation and enhancement works as set out in the HMMP have been completed.

Reason for all the above: To ensure the development delivers a biodiversity net gain on site in accordance with paragraph 2 Schedule 7A of the Town and Country Planning Act 1990 and policy DM11.

Other ecological enhancements

Section 4.4 of the Ecological Assessment (SLR Consulting, June 2024) recommends several biodiversity enhancements such as wildlife friendly planting (which could also include scattered scrub) and invertebrate habitat features (such as loggeries, solitary beehives and habitat panels). Paragraph 5.25 of the Planning Statement only states the invertebrate features will be considered. The site's ecology would benefit from the implementation of these recommended enhancements and should therefore form a confirmed part of the proposals. The inclusion of scrub as wildlife friendly planting will provide habitat similar to that lost on site in recent years (tree and scrub removal from near the garage) and provide suitable habitat for the location of the loggeries. Please note, the post development section of the submitted metric may need to be amended accordingly to accommodate any scrub planting and any SuDS design (see Drainage comments below). The Biodiversity Gain Plan and HMMP will need to reflect this.

A detailed landscape and ecology enhancement plan(s) must be submitted and approved which shows all planting specifications (and relate this to statutory BNG

habitats where appropriate) and locations of other ecological enhancements such as the invertebrate habitat features. **This can be conditioned.**

Noise impacts on ecological receptors

The Planning Statement states that the noise of the centrifuge will be between 82-86dB at 1m. The application has not considered the potential impact of noise on the nearest ecological receptors (only on the nearest residential property). However, the placing of the centrifuge within the acoustic enclosure of the proposed building will reduce the noise levels on any ecological receptors although it is not clear to what extent. Nonetheless, it is anticipated that any significant negative impacts caused by elevated noise levels will be limited.

Lighting impacts on ecological receptors

It is stated in the Planning Statement that the existing buildings have security lighting. It has not been made clear if external lighting is proposed for the new building. Any new external lighting must be designed to minimise light spill whilst fulfilling its purpose. Details of external lighting must therefore be submitted and approved to ensure there are no additional negative impacts on ecology. **This can be conditioned.** There must not be more than 1 lux on adjacent habitats caused by artificial lighting.

CEMP

The CEMP is satisfactory.

Drainage

There will be an increase in impermeable surfacing on site. The Flood Risk Assessment (May 2024, Godsell Arnold Partnership) does not include a surface water drainage strategy and does not state how the surface water runoff will be treated to prevent adverse impacts on water quality. A surface water drainage strategy which addresses the four pillars of SuDS and satisfies EBC policy DM6 must be submitted and approved. **This can be conditioned.** Please note that an acceptable SuDS strategy will include SuDS features which may require the BNG metric to be updated and the Biodiversity Gain Plan and HMMP to reflect these changes.

Sarah Boyd, Ecologist