

Ecology response 5 2 25 for F/24/98678 Land East of Chickenhall Lane, Eastleigh, SO50 6AF

Construction of a 70-bed care home (Use Class C2), with associated parking, landscaping, access, drainage, and other associated works following demolition of existing structures.

Rebecca Altman

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Ecology objects to this application on the grounds of layout, proximity and lack of a suitable buffer to the River Itchen SAC. In addition, the SuDs strategy does not meet the requirements of Local Plan Policy DM 6. The application would fail a Habitats Regulations Assessment due to impacts on the SAC.

Location and layout

The site is located within priority habitat along the Barton River which is designated as protected waters of the River Itchen SAC and SSSI. It is functionally linked to the rest of ecologically sensitive River Itchen complex and within 10m of the SAC boundary.

The Ecology response to the pre-app Q/24/97879 stated that *a 50 m buffer to the Barton River will be required*. The 8 to 15 m buffer proposed in this application is not sufficient to protect the SAC. The buffer must not contain any development including buildings, footpaths, gardens, fencing, light spill or car parking.

The proposed building would be 3 stories tall and would cause an unacceptable amount of shading on the SAC buffer, especially in winter.

The biodiversity net gain calculations would need to be revisited with a revised site layout.

Surface water drainage

The Ecology response to the pre-app Q/24/97879 stated that *A surface water drainage plan which conforms to the water quality requirements of DM 6 and shows that all pollution hazards are mitigated will be required. DM6 states that wherever feasible, naturalised filtration should be included within the treatment train as follows: a. On sites of 1 hectare or more, or within 100m of the River Itchen SAC or Solent Maritime SAC, SuDS schemes should include at least three forms of naturalised filtration before surface water is discharged off site.*

The surface water drainage strategy for this application lists four rain gardens, French drains, permeable paving and a swale as forms of treatment for runoff, however it has not been demonstrated that all of the surface water will be treated by all of these components. The proposed swale is located outside of the red line boundary and is too short. It would not function as a form of water treatment when overtopped by high water. The surface water drainage from the car park would only have one form of treatment provided by the permeable paving.

Tables 3 and 4 on the simple index approach have been copied from the SuDS manual and inferences made, but the specific calculations for the roof water and car park areas in this application have not been done. It is also not clear whether these components are

compatible with the high ground water levels on site. The site investigation reported ground water encountered at depths from 0.58 m to 1.22m below ground level, so ground water flooding must also be considered.

Permeable paving is proposed for the majority of the attenuation and is proposed to be 0.5 m deep with 30% void storage. This is only slightly shallower than the highest groundwater.

Information has not been provided on the flow of surface water through the system and the effects of high groundwater on the proposals. A diagram showing the path of each surface water flow with arrows would be required to demonstrate that all of the surface water passes through at least 3 forms of naturalised filtration within the treatment train before being discharged off site.

If these objections can be resolved and the application is to progress further, please re-consult Ecology.

Additional comments

Three hedgerows have been identified on site, two of which (H1 and H2) qualify as habitats of principal importance hedgerows in poor condition. Reptiles were assessed as likely to be present in hedgerow H1.

Other neutral grassland in poor condition has been recorded in the southern section of the site with the wetter areas in the southeastern corner identified as Coastal floodplain grazing marsh priority habitat.

Protected species surveys have been done in 2024. The site is being used by foraging and commuting bats, nesting birds, common lizards and grass snakes and hedgehogs (assumed present due to suitable habitat on site and records in connected nearby habitat).

Great crested newts have been ruled out due to major barriers to dispersal from known populations.

No signs of badgers, water voles or otters were recorded on site at the time of the survey, but the habitat is suitable and there are known populations within 1 km, so precautionary working methods for these species must be implemented. This will include pre-works update survey for signs of water voles and otters and habitat management to deter presence during construction. If signs of water voles or otters are found, all work in this area must stop and a license must be obtained from Natural England.

Any vegetation to be removed to facilitate the development must be removed outside of bird nesting season (which is usually between the beginning of March and the end of August) or if this is not possible then only after being checked for nesting birds by a suitably qualified ecologist up to 24 hours before the start of works. If any active nests are found, work must stop, and a 5 m buffer must be erected around the nest to protect it from disturbance until after the birds have fledged and left the nest.

The Ecological Impact Appraisal report recommends an Ecological Construction and Environmental Management Plan (ECEMP) to include the specific precautionary working

method statements and management plans for each protected species. This can be conditioned. It must contain a biodiversity enhancement plan to include the locations and specifications of any species-specific enhancements on site (bat boxes, swift bricks, reptile habitat and hibernacula, hedgehog passageways and hibernation/ sheltering areas).

Lighting

I have reviewed the Artificial Lighting Assessment by Dice Environmental (v3, December 2024). The report states *The modelling results indicated that there are no exceedances of 0.5 lux predicted at any of the sensitive ecological receptors.*

The references include the Bats and Artificial Lighting in the UK guidance from 2008. This is outdated. The latest updated lighting guidance note (GN08/23) should be followed. This is available at [Guidance Note 8 Bats and Artificial Lighting | Institution of Lighting Professionals \(theilp.org.uk\)](https://theilp.org.uk/Guidance%20Note%208%20Bats%20and%20Artificial%20Lighting%20-%20GN08%2F23.pdf).

Figures 4 and 5 are titled Predicted Lux Level. They show the faces of the building and the land surrounding the building, but there is no key given to interpret the colours in these diagrams.

The locations of bat boxes mounted on the building elevations have not been considered, as their exact locations have not yet been specified. Any hedgerows and trees must also be considered as ecological receptors as bats use them for commuting and foraging. Full size diagrams with the lux level information, direction arrows, the locations of the bat boxes, hedgerows and trees must be submitted.

There is also a proposed garden building that does not appear on the lighting diagram. Light spill from the windows must be considered in addition to any exterior lighting.

Proposed Landscaping

I have reviewed the Landscape General Arrangement Plan (rev E, December 2024) and The Landscape and Ecological Management Plan (LEMP) (November 2024) both by Deacon Design.

The LEMP table of contents includes three sections which are labelled Error! Bookmark not defined.

Section 3.28 needs clarification. As written: *Wildflower - Once established the wildflower requires very little maintenance, however, there is one important task to carry out each autumn; to cut the plants and remove these cuttings.*

This should be amended to: Wildflower grassland- once established the wildflower grassland must be cut according to the specific directions provided by the seed supplier. Further details are provided in sections 4.24-4.33. Two different seed mixes have been mentioned (EM8 and EM4) so the mowing regimes for each should be specified separately.

In section 4 the section labelled Biodiversity Enhancements is highlighted and labelled *Ecologist's input required*. This is quite general. It must be tailored to the specific enhancements proposed for this site and re-submitted for review.

Section 4.13 should be changed to include hibernating hedgehogs rather than dormice, as dormice have been scoped out of this site. If hedgerow bases are proposed to be cut, an ecologist must do a fingertip search for hedgehogs immediately before the start of works.

The existing vegetation section (4.14 and 4.15) has also been labelled *Ecologist's input required*. A detailed Botanical Species List has been provided in Appendix B of the Ecological Impact Appraisal by FPCR (Rev B, December 2024) and does not need to be repeated in the LEMP.

Section 4.17 should include hedgerow management on a three-year rotation (as explained in 5.30), cutting only each side or the top annually, outside of bird nesting season and after flowering has ended so that there is also a supply of nectar and pollen for pollinating insects.

The Soft Landscape Maintenance table in 4.34 includes Treat all planting beds with a winter herbicide to control weed growth. This is repeated in table 6.1 specimen trees post construction. **The use of any herbicides, pesticides and artificial fertilisers must be avoided in this ecologically sensitive area so that they will not pollute the surface water or ground water which flows into the SAC.**

Section 6.2 includes applying fertiliser to the proposed hedging, this also needs to be reconsidered. Wildflowers should be encouraged to grow under the hedging and use of fertiliser will promote nutrient-hungry species to grow out-competing wildflowers which do best on nutrient-poor soils.

Herbicides and fertiliser are mentioned again in this table in section 6.3 Management of Ornamental shrub planting and section 6.6 Management of Amenity Grass Areas, and 6.10 Management of Paved Surfaces. The use of Moss and weed killer is mentioned in 6.11 Management of Asphalt and Concrete Road Surfaces and Footpaths. Any changes must also be reflected in table 7. Hand removal or use of a pressure washer is preferable to herbicides and the use of compost is preferable to the use of chemical fertilisers.

Section 5.23-5.245.25 should include that a variety of seed heads and fruit should be left as food for birds (not just because they are attractive) and not removed in autumn and winter.

The LEMP should also include any specific information required for managing the rain gardens proposed on site.

CEMP

I have reviewed the CEMP by Highwood Construction (v3 2024). The locations of the silt barriers and bunds around the eastern perimeter of the site adjacent to the Barton River must be added to the site logistics plan in Appendix 1.

A named site manager must be identified to inspect, repair and replace silt barriers and bunds daily. Replacement supplies for silt barriers must be kept on site and always available

All site operatives must understand the importance of keeping the silt barriers intact and functional.

All excavations and open pipes must either be covered at night or fitted with a small animal escape ramp to allow any animals to escape if they fall in. These areas must be checked by the site manager every morning before the ramps are removed.

Specific precautionary working method statements for each protected species must be conditioned in a separate document (ECEMP) as proposed by the Ecological Impact Assessment report.

Lisa Malter

Ecologist