

F/25/100154 91B The Crescent

Construction of a six-dwelling terrace

Ecology comments 8.1.26

I do not object to the development in principle however I have a HOLDING OBJECTION for the following reasons:

1. An incorrect BNG baseline and inconsistent habitat proposals.
2. Insufficient information regarding the treatment of surface water runoff and potentially the provision of insufficient space in the proposed layout to deliver the required SuDS features.

BNG - incorrect baseline

The site has been pre-emptively cleared of vegetation which is not best practice.

The biodiversity baseline must therefore be set to a date prior to the clearance in accordance with The Environment Act 2021. Although the submitted BNG metric and Biodiversity Habitats Plan recognises the requirement to do this, the baseline appears to be incorrect. A minimum of ten trees has been removed which is evident from the stumps visible in the submitted pre-application photograph. The metric and Biodiversity Habitats Plan only record the loss of four trees. The omission also includes the more substantial trees which were located in the centre of the site, visible from aerial photographs. Therefore, the biodiversity loss is currently undervalued and the true loss is greater than stated.

If the LPA is minded to approve the application, the correct baseline must be submitted prior to determination to enable the correct number of units to be delivered on-site and purchased off-site.

Landscape Management Plan

The 30-year Landscape Management Plan states that a hedge is proposed. This is not included in the metric. These two documents and the landscape plan need to be consistent.

The document places the management and reporting responsibilities on the landowners. Presumably there therefore could be up to six landowners. Who is therefore responsible for the communal areas where the two small trees, hedge and green roof are located?

Other biodiversity enhancements

The dwellings must have integrated bird and bat boxes installed e.g. swift bricks at appropriate locations. This can be conditioned.

Surface water runoff

Information regarding surface water runoff has not been provided and is required at this stage.

Where is the proposed point of discharge for the surface water run-off? The discharge hierarchy must be adhered to. The highest priority in the hierarchy is *collection for non-potable use* i.e. rainwater harvesting. This must be considered in the scheme, as section 1.11 of the National Standards for Sustainable Drainage Systems applies to this site, and it must be demonstrated that this has been utilised to the maximum extent practicable. It may not be practicable for this site (beyond the use of water butts). Please note that the plan provided by Southern Water only shows foul sewers in the vicinity of the site (neither combined nor surface water sewers are shown at the site location).

What are the proposed discharge rates and volumes (flow parameters)? The proposal will result in the increase of hard surfaces on site and therefore there is the potential for increased surface water run-off rates and volumes without attenuation. A site of this size is below the threshold for comments from the LLFA, however the LPA is still responsible in ensuring that the development will not result in increased flood risk elsewhere. If a Southern Water sewer is proposed to be the final destination for the surface water runoff, then we would need to see confirmation from Southern Water that the receiving system has the capacity to accommodate any specified additional flows and also to prevent increased pollution risk from surcharging. The correspondence from Southern Water does not provide this as the flow parameters have not been provided.

It needs to be demonstrated that interception has been maximised (at least the first 5mm of rainfall does not result in runoff from site). Note that water butts generally do not contribute to this requirement but they are a valuable addition to sustainable water management nonetheless.

A suggestion would be that runoff potentially could be managed with water butts, rain gardens/ swale and permeable paving in the parking area and elsewhere. However, my concern is that sufficient space for these features (specifically the rain gardens/ swale) is not available within the current layout and therefore applying a condition which is deliverable to any permission as the proposals stand would not be possible. The potential ground contamination does not preclude the use of these features but will inform their design. Management of these features for the lifetime of the development will also be required.

The water quality of the discharge is also a consideration. The final destination (point of discharge) of the surface water runoff is required to comment fully on the level of filtration required.

Helpful guidance and tools can be found at [National standards for sustainable drainage systems \(SuDS\) - GOV.UK](#) and [Tools | UK SuDS](#).

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