

Your ref: 5099849

Our ref:

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15 Jan 2013

Dear Stephen,

Planning Application Dunsbury Hill Farm – Request for further information under Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011

I am writing in response to your e-mail dated 8th January 2013 in which you summarise the requests for further information in relation to the Environmental Statement (ES) submitted with the Dunsbury Hill Farm hybrid planning application. I have also responded to Hampshire County Council's letter dated 26th June 2012, 23rd August 2012 and 28th August 2012 as well as Highways Agency's letter dated 4th May 2012.

In my role as Project Manager I provide the following response to the requests for further information and clarifications. I have appended to this letter the following supporting documents for your consideration:

- Dunsbury Hill Farm Transport Assessment – Addendum Report;
- ASDA Roundabout Improvement Study – Preliminary Design Report;
- Revised Figure 5.8 from the Design Access and Access statement which shows Park Lane bridleway;
- Your collated Environmental Statement queries; and
- Updated Bat Survey Report

Environmental Statement Queries

Forestry Commission

"Confirmation of whether felling licence is needed".

Felling Licenses are granted by the Forestry Commission. They are required if the woodland owner/manager is felling over 5 cubic metres of wood on their property in any calendar quarter.

There are exemptions though and these include for felling trees required for the purpose of carrying out development authorised by planning permission as granted under the Town and Country Planning Act 1990. As this development is being put forward for planning then a felling license would not have to be sought.

Hants Fire & Rescue

"Confirm the Access Roads should comply with S17 of B. Regs Document B."

All access roads within the site will comply with the required statutory standards.

HBC Environmental Health

"Land Contamination - Please provide the desk study & phase 1 investigation."

The documents are requested as a condition along with the contamination strategy. The Geotechnical Interpretative Report (December 2011) submitted as part of the planning application has detail on our desk study and phase 1 investigations.

Is any further information needed regarding clean values in the question of hotspot identification? "It is not clear what procedure would be employed for identifying such "hotspots", how the quantity of soil requiring removal / treatment would be decided, what values would be considered 'clean', and what treatment may entail (although 'dig & dump' is assumed)."

We believe that this will be investigated as part of the contamination strategy and should be considered at the reserved matter stage.

HBC Building Control

"Unable to indicate how the sewers will affect the buildings or whether there will be adequate access for the fire service. There are foul and storm water public sewers running across the site which may be within 3m of the proposed buildings. Please confirm any implications?"

There are two existing foul sewers crossing the southern part of the site. There will be no implications from a 3m buffer. This will be addressed at reserved matters stage.

Environment Agency

- *"Issues regarding link road and stream restoration point. Please clarify.*
- *Does 20m buffer strip have implications for site layout? Can quantum of development still be delivered?*
- *Southern Water response does not comment on capacity. Can Atkins confirm?*
- *Any culverting proposed?"*

In principle it is agreed that the scheme should look to maximise opportunities to naturalise heavily modified stream sections such as that presenting for the Hermitage Stream downstream of the A3. The original proposal considered the extent of channel, and included the following considerations:

- a. Access constraints to the Hermitage stream immediately below A3 would mean that the existing woodland to the left hand bank would have to be cleared if naturalisation of the channel were to be undertaken within scheme boundary land. This woodland section was identified by the terrestrial ecologists as having value as a wildlife corridor especially for dormice.
- b. Immediately downstream of the A3 to the left hand bank of the stream is a storm water storage tank with discharge point to the Hermitage Stream, taking run-off from the A3. It was considered at the time of visit that retaining the upstream reinforced section would reduce the risk of stream erosion, i.e. naturalisation of the river may only promote future erosion issues which could impact downstream aquatic ecological receptors. A full geomorphological investigation would be required alongside river restoration detailed channel design which would inform as to the possibilities of removing all channel reinforcing up to the A3. This would need to be done in consultation with the Highways Agency.

We can confirm that the development plots are not within 20m of Hermitage Stream, Park Lane Stream or Bell's Copse. However, there will obviously be some development associated with the link road crossing over Hermitage Stream.

From an aquatic and riparian ecological perspective bridge crossings over streams can result in local reduction in ecological value as a result of shading impacts on primary and secondary production. In this instance it is important to note that the link road crossing will be over an open channel i.e. no culverting is proposed. As such, habitat connectivity for both aquatic and water dependant species (e.g. water voles) will be maintained.

The restoration channel design proposal shows the restoration realignment to pass under the road alignment at an angle that reduces the extent of shading impact. This should be the approach adopted for detailed design to ensure only a very limited loss of ecological integrity associated with the crossing point.

Southern Water has provided an indication that there is sufficient existing capacity for the early stages of the Proposed Development to discharge to sewers. However, it has been recommended that before any construction is undertaken, further full development checks are made. Budd's Farm wastewater treatment works has a constrained consent with capacity for planned housing development, but may not have sufficient capacity for additional industrial flows. Therefore there is a general requirement on the development for a high level of water efficiency in order to minimise additional sewage flows.

Although there is an indication that there is capacity for foul water removal through communication with the sewerage provider, there may be a change in these circumstances prior to construction.

It is proposed that further consultation and provision of more detailed information should be provided to the sewerage provider as part of a detailed planning application (para 13.176 of Environmental Statement).

Portsmouth Water has confirmed that there would be sufficient supply of water to meet the demands of the Proposed Development (para 13.2 of Environmental Statement).

We can confirm that no culverting will be proposed as part of this scheme.

Crime Reduction Officer

"Can applicant confirm commitment to CCTV where needed and selective use of 3m fences may be needed. If used too widely, may result in poor appearance. What is applicant's view?"

We can confirm a commitment to CCTV where needed. Boundary treatment will be addressed at condition and reserved matters stage.

HIOW Wildlife Trust

"The application does not describe the landscape and wildlife value of the site as a whole. Site is partly derived from Forest of Bere, an area of diverse countryside whose loss will diminish the character of the Borough and quality of life".

In terms of landscape value of the site the Landscape and Visual Assessment is included as Chapter 14 of the Environmental Statement. This considers the effects of the Proposed Development on sensitive landscape receptors including: South Downs National Park; and Chichester Harbour Area of Outstanding Natural Beauty at a regional level, and at a local level Staunton County Park; the bridleways and footpaths that make up the Green Infrastructure of South Hampshire and the Forest of Bere and that link Waterloo, Dunsbury Hill, Staunton County Park and Havant Thicket Reservoir.

It is considered that the proposals do provide opportunity to reinforce woodland, particularly boundary planting, helping to mitigate the effects with careful location of proposed buildings within an overarching landscape structure. Impact upon site vegetation would be limited with the majority of vegetation retained and reinforced as part of the proposed landscape structure with the exception of the loss of the mature oak/ash trees along the proposed alignment of the link road to the immediate north of its junction with Hulbert Road.

In terms of wildlife value of the site Atkins Ecology have focused within the ES on the value of individual habitats and species across the site. The development is heavily focused on the arable fields, and habitat connectivity has been taken into account by focusing on species, such as dormice, reptiles and bats.

For instance some of the mitigation proposed for bats in terms of connectivity we have stated in the ES;

"There are currently no existing barriers to foraging and dispersal routes for bats within the site. The field and woodland margins provide good foraging habitats whilst the hedgerows and woodland edges provide good commuting routes. The proposed link road would reduce the linkage between woodlands on either side of the road, and is especially likely to reduce connectivity between Cherry Tree Row SINC and the long hedgerow that crosses the site to the west of Park Lane. Bat "hop-overs" in the form of tall semi-mature trees will therefore be planted close to the road and some of the access routes, on either side, in order to help bats cross this new barrier to commuting".

We have also stated in the ES that as well as retaining and enhancing as much habitat connectivity as possible, we will take measures to protect existing woodland and hedgerow habitats through buffer planting. There will also be a habitat creation area within a field immediately to the north of the scheme to provide a habitat mosaic of woodland edge, scrub and grassland with ponds.

"There is over-reliance on tree planting, the removal of species which may well have a considerable invertebrate interest (aspen), the lack of recognition of the importance of woodland management and open habitat matrices together with a lack of recognition that effective woodland management may periodically change the landscape of the site including views into the site"

Although we have buffer planting of trees and shrubs to enhance areas, such as woodland edges of the various adjoining SINC's, there will also be a habitat creation area (approximately 3 ha) within a field immediately to the north of the scheme to provide a habitat mosaic of woodland edge, scrub and grassland with ponds. Within this habitat creation area there will be log/brush piles and decaying root stumps which will be used by invertebrates, reptiles, amphibians and small mammals. Turves taken from the species-rich grassland to the south-west of the site (at the location of the proposed hotel), will be placed on top of two artificial hibernation sites created for reptiles and amphibians within this area. Turves can also be translocated to other parts of this habitat creation area. This habitat creation area will also aid in meeting the Core Strategy requirement for the proposed development to meet a BREEAM "excellent" standard.

Subject to approval by Portsmouth City Council, Beech Wood East SINC boundary to be extended to include the new habitat creation area. A management plan for Beech Wood East SINC to include the new habitat creation area will be implemented to enhance the habitat for biodiversity.

The localised felling of self-set semi-mature aspens which have limited arboricultural and landscape significance is limited to a small group associated with the wood pasture habitat of 0.2 ha of Neville's Park East Wood SINC which will be lost to the proposed link road. A number of mature aspens are present within Beech Wood East SINC particularly along the woodland edges and will not only be retained, but protected and enhanced by appropriate buffer planting. The aspens that will be felled can be used as part of the log piles within the habitat creation

area and also within existing woodland where appropriate to enhance features for invertebrates and other species.

"The Habitats Regulation Assessment (pg 23/24) accompanying the application recognises that the site may be used as a high water wader roost. Such roosts are known to be present around the Borough and contribute to the structure and functioning of the coastal Special Protection Areas (see "Solent Waders and Brent Goose Strategy" 2010). We are in agreement with the consultant's judgement that the application site may support Brent Geese as indicated by the data provided by HBIC, but there is no record of consideration as to whether the survey of overwintering birds is proportionate. We do not believe the assessment satisfies the intentions of the Borough's policy DM23 – Uncertain Sites for Brent Geese and Waders: Where sites are identified as having an uncertain value within and as defined by the Solent Waders and Brent Goose Strategy (2010), studies will be required to be undertaken in accordance with an appropriate survey methodology in order to determine their level of importance. "Sites of important or uncertain value to Brent Geese and waders have been identified within the Solent Waders and Brent Goose Strategy (2010). Where sites are of uncertain value, site studies should be undertaken in accordance with an appropriate survey methodology in order to determine their level of importance. Appropriate methodologies should be approved by a professional ecologist and prepared in consultation with Natural England. One such methodology is outlined in the Solent Waders and Brent Goose Strategy (2010)".

Although the HRA states that "The proposed development will result in the loss of land that may be used by internationally important migratory and over-wintering bird species using the habitats within the international sites boundary". It also follows that "Bird surveys were carried out in Dunsbury Hill Farm as part of the ongoing EIA for the scheme in December 2010 and January 2011. None of the various qualifying species for the SPA/Ramsar site were recorded using the Dunsbury Hill Farm site. Consequently, the qualifying bird species from the SPA/Ramsar site are not using the land of the proposed development, and therefore there is no likely significant effect on the international sites from land take".

The Dunsbury Hill Farm site is approximately 6.5 km from the SPA/Ramsar site, and, as stated in the Solent Waders and Brent Goose Strategy (2010), Brent geese use a great deal of energy travelling between feeding areas, so tend to preferentially select sites adjacent to the coast. The long distance from the SPA (6.5 km), combined with the separation by busy roads, buildings etc, and the lack of any desk study records of Brent geese in the Leigh Park area since 1997, and the absence of any birds during the 2010/2011 wintering bird surveys, strongly indicates that this site is not used by foraging Brent geese or any other qualifying SPA species. Therefore, the site is not of uncertain value, but rather, is of negligible importance for foraging/roosting qualifying SPA/Ramsar species.

"In relation to Ian Morrissey's comments on maximising opportunities to naturalised heavily modified stream sections such as that presenting for the Hermitage Stream downstream of the A3".

Access constraints to the Hermitage Stream immediately below the A3 would mean that the existing woodland to true left hand bank would have to be cleared if naturalisation of the channel were to be undertaken within scheme boundary land. This woodland section was identified by the terrestrial ecologists as having values as wildlife corridor especially for dormice. I can confirm that this woodland section has value as a wildlife corridor for species, such as dormice, bats and nesting birds.

Southern Water

"Although outline stage, please locate sewer plan needed and confirm that development quantum and main features of masterplan can be delivered."

There are two existing foul sewers crossing the southern part of the Site. The Environment Agency has indicated that sewers in this area flow to Budd's Farm wastewater treatment works. This will not affect the quantum of development and main features of the masterplan can be delivered.

Southern Gas

"Applicant's confirmation that distance, risks & methods can be met. If not, what are implications?"

Following early consultation with Brian Bull of Southern Gas Networks in March 2011, the applicant is aware of the high pressure pipeline and the buffer zone. This has informed the masterplan layout. Compliance with the conditions will not be an issue.

I trust you have all the relevant information. Please feel free to call me if you have any further queries regarding this matter.

Yours sincerely
For and on behalf of Atkins Ltd.



Senthuran Sritharan
Managing Consultant

c.c. David Ball