

Winchester City Council statement on Biodiversity.

21 December 2020

WCC has noted the information submitted to date by the applicant relating to its questions on biodiversity impacts at Lovedean and at Denmead Meadows. The Council has also noted the information contained within the Statements of Common Ground between Aquind and relevant parties. The Council is aware of the impending submission of a further biodiversity paper at D6. However, the responses below are confined to the detail already within the public arena. The Council continues to have outstanding questions relating to the impacts/proposals at Lovedean and Denmead Meadows.

Lovedean

The questions here relates to the following:

1. Final responses to the actions proposed by WCC to enhance the new planting as outlined previously.
 - In the draft SoCG with the Council it seems that some of the issues have been adopted but possibly not all. It is understood that a new landscaping plan will be submitted at D6 and the Council will review and comment on this at D7.
 - **Question:** How will the calcareous grassland be established on what is a clay/loam soil and sub soil base with a combined average depth of 1m?.
 - The latest response to this question has generated two options. Either, the removal of the top soil and sub soil down to the chalk bed, or the inversion of the soil/clay and chalk. Both actions would seem to place a heavy use on construction plant and equipment.
 - **Question:** Considering that other priority habitats such as deciduous woodland could be formed on the site, why expend all the resources establishing a calcareous grassland?
 - **Question:** Some of the parcels of land that are shown as grassland are small odd sizes; might these not be given over to other habitats?
 - **Question:** If the top soil and sub soil is removed, how would the spoil be disposed of?
 - **Question:** With the first option, how would the differences in ground levels be accommodated on site where existing features such as hedges or trees and solid structures such as the base for pylons exist? Will landscape features not end up on top of banks with all the stress that can create to their survival or establishment in the case of new planting?
 - **Question:** Following on from the above will the resultant topography not appear erratic ?

- **Question:** Regarding both options, have the implications on surface water drainage been taken into consideration?

Denmead Meadows

1. WCC understands that there are two options under consideration for the location of the HDD launch compound. The first site is located on the south side of the Hambledon Road and the second on the north side of the road.
2. As a principle, WCC supports the southern location, which would avoid any need to disturb to Field 3 at Denmead Meadows.
3. WCC notes the reference to technical issues with the use of the southern compound, which it is understood, relates to the cable achieving a bend to enter the underground drill section to then be pulled through. If a jointing bay were located at this point, would that not allow the cables to make a more acute change in direction? Whilst this may result in more connections between lengths of the cable than desired, it has to be considered against the acknowledged harm that will result to the biodiversity value of the land on the north side of the road if the compound is located there.
4. The cable exit from the Hambledon Road into a compound on the south side of the road may impact a longer section of hedge. However, on balance this is preferable if it retains the full integrity of the land on the north side of the road.

Question: When does the applicant anticipate making the decision on the choice of the location of the launch compound?

5. If there are over whelming and fundamental technical reasons why the HDD launch compound cannot be located on the south side of the road these should be clearly set out by the applicant at this stage of the Examination. Until the above is considered and set out in detail together with a full outline of the implications of a compound located on the north side of the road, the Council does not consider that the assessment of one site against the other can take place.
6. The Council considers that this assessment must form part of the current Examination Process .

The following points are offered on the understanding the north side is shown to be the only option available

7. On the north side of the road, the Council would like the applicant to affirm that no trees on the Hambledon Road frontage will be lost when the cable or vehicle access enters Field 3. This should be accomplished by the identification and further analysis of the proposed access points.

8. A tree preservation order has been imposed of trees on the road frontage and one tree back into Field 3. The applicant should review the access point and cable run into this land in the light of the new TPO.

9. WCC continues to express concern over the presence of the access rights strip that runs up the western side of the Order limits through Denmead Meadows parcels 3-12a & 3-13a as shown on Land Plans rev003 REP5-003.. The most recent response says that was an error and it will not be a haul route.

Question: If vehicles are not to use this strip where is this stated, given the broad nature of uses set out under the definition of “access rights” as detailed in the Book of Reference (REP5-015).

10. At the northern end, in addition to the access being cut through the roadside hedge there will also be a separate section cut out for the cable corridor. Allowing for the existing gate at Anmore Road the estimated loss is 20m + of hedge here.

Question: Is that a fair estimate? This will have a significant effect on the appearance of the boundary between Anmore Road and Denmead Meadows particularly in the short medium term whilst any new hedge establishes.

Question: It appears there is at least one tree in this vegetation. Where will the replacement be located?

Question: What is the access route on the local road network for HGVs to get to the northern compound?

11. It would appear that no special measures are proposed in Field 8 although this is part of a SINC. The Council is of the view that the poor condition of the habitat value in Field 8 is a result of its management regime and that if this changed the vegetation may well recover. The applicants approach would remove that regeneration ability forever and should be addressed. The applicant should address the impact on what is part of a designated site.

Question: As Field 8 east is part of the designated SINC the applicant needs to justify the above approach in more detail.

12. Regarding Field 3 a strategy (expanding on the mitigation identified in sections 16.8.2 to 16.8.4 of ES Chapter 16 Onshore Ecology (APP-131) seeks to avoid potential effects through controlling working practices.

The strategy will comprise seven key actions:

Question: Whilst acknowledging the seed collection activity, is lifting the turfs for storage off site not putting all the main effort into one course of action. If for any reason that should fail then the risks to the plant population is significant.

Has consideration been given to any other actions (even if discounted) that would spread the risk?

13. The timing of the work associated with Field 3 at the southern end would avoid the growing season so work is to be undertaken between August and November. The SoCG with Portsmouth Water or the Environment Agency says work at the northern end has to take place in the summer (*June-August*) due to hydrological issues associated with the pond.

Question: If the work will take around 13 weeks the available window that satisfies the constraints at both ends seems very short.

Is there a chronology of events for Denmead Meadows that works within the above restrictions at both ends?

14. Turf stripping and preservation – turves to be cut from Field 3 and stored locally. Appropriate collection and storage methodologies will be implemented including the use of a telehandler and plastic sheeting respectively. Turves will be kept moist and monitored daily.

Question: There does not appear to be any precedence quoted for lifting and storing turfs for this duration. It therefore seems extremely unpredictable with an uncertain outcome. Surely the applicant must adopt the concept of worst case scenario which is total loss. This goes back to the principle reasons to choosing this location.

Question: Multiple monitoring events are required at different times during every day of the week.

Question: What would happen if for some unexpected reason the storage period goes on longer than anticipated?

15. Soil structure protection – Sub soil removed from Field 3 will be stored during works and replaced following works.

Question: Where will the subsoil from Field 3 be stored and how will it be kept in good condition?

Ground protection (temporary membrane and bog matting) will prevent soil compaction

Question: Do these actions totally eliminate compaction or just minimise it in the context of what weight is placed on them which means some compaction still occurs?

14. Habitat restoration – Turves will be returned to Field 3 following completion of works alongside re-seeding of Fields 3, 8 and 13.

Question: Presumably the turfs will not be replaced in the position they can from. As the orchids are very sensitive to their micro positions what are the chances they will recover?

Question: The replacement may not fill all the available space. What will be used to fill in any remaining voids and where will this material be sourced from?

7. Monitoring and management – Three years light touch management in years 1,3 & 5 of Fields 3, 8 and 13 (areas within Order Limits) in order to maintain diversity. Botanical survey to take place once yearly to inform any changes to management prescriptions e.g. grazing.

Question: What is the definition of a successful reinstatement?

Question: What happens if at the end of year 5 the vegetation is not as *strong* as it was before? Will continued management take place or will some other compensation be offered?

Question: How will this eventuality be addressed and secured through the dDCO?

Question: Where is the mitigation for the residual loss of habitat from that which originally existing.

When discussing the Biodiversity Matrix it was indicated Denmead Meadows had been removed from the assessment and was to be addressed separately. This is confirmed in the following:

Biodiversity Position Paper REP1-138

Section 3.2.1.1 The importance of Lowland Meadow Priority Habitat at Denmead Meadows has led to its **exclusion** from the Biodiversity Metric, with reasoning for this decision discussed in Section 4.3.

Question: Habitat enhancement (net gain) measures are proposed up at Lovedean, but where is the equivalent for the Denmead Meadows section?

End.