

Aldingbourne Parish Councils Comments on the Ecological Rebuttal Re AL/111/16

We have now had the opportunity to review the report by Liz Rogers and the rebuttal by Arbteck

There were believed to be four species of reptile on this site, Slow worm, Grass snake, Adder and common lizard, prior to its attempted destruction.

The statement by Arbtec that only 14 species have been recorded in 20 years is entirely misleading: This figure only related to records submitted to the Biological Records Centre. The absence of submitted records is not evidence of absence of species. There appear to have been regular sightings of numbers of these species by local people. Arbtec state that it was only ever of medium suitability for reptiles, yet no effective survey was carried out by them. Guidelines developed for assessing reptile populations suggest that sites which support three or more species of reptile or an exceptional population of a single species should be considered a 'key reptile site' (2005 Handbook of Biodiversity Methods: Survey, Evaluation and Monitoring).

Liz Rogers claim that there was a high likelihood that the Wildlife and Countryside Act was broken is correct. The claim by Arbtec that the site was cleared in accordance with a plan is something of a revision of the facts: The contractor who ordered the equipment and who undertook the work knew nothing of the presence of any protected species until it was pointed out to him during the clearance, when the work was temporarily halted.

The mitigation plan is wholly inadequate because it fails to consider the wider ecological interest of the site, which is broader than the reptile population, a point missed in both reports. The area sits within a wider landscape which the parish council has demonstrated is an important landscape both historically and visually and which in addition contains a wide variety of wildlife, far more than only reptiles. The report fails to mention bats, birds and insects. 8 different species of bat are recorded for the biodiversity corridor East of Westergate as a whole, of which this sites forms a part. The bird population of the biodiversity corridor includes Cetti's Warbler, a schedule 1 species breeding in the adjacent wet woodland to this site, which is afforded protection in terms of disturbance. The entomological interest of the biodiversity corridor includes several nationally scarce/rare species such as Picture-winged fly, the Social Wasp and Mining Bees.

The Parish Council does not support the assertion that the only part of the site that meets the biodiversity criteria is eastern tree line. The whole site is included in the biodiversity corridor and the whole site is subject to policy EH2. This development breaches that policy.

The Parish Council, as stated in its earlier correspondence, objects to the development of the site which is designated as a biodiversity corridor in the made Neighbourhood Plan. The Green / biodiversity corridor as designated is the most important visually , historically and most biodiverse part of Arun's proposed strategic allocation site.

Aldingbourne Parish Council

May 2017