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Marie Singleton  
Parish Clerk  
Aldingbourne Parish Council  
C/O Aldingbourne Community Sports Centre  
Olivers Meadow  
Westergate  
Chichester  
West Sussex PO20 3YA

14 April 2024

Our reference. APC/Ecol/270324/Erratum

Dear Ms Singleton,

**Re: Planning Application Ref. AL/11/24/OUT – Land East of Westergate**

It has been drawn to my attention that the wording I have used within my letter to Aldingbourne Parish Council on 27 March 2024 (also appended to your own letter to Arun District Council), may be misleading. On page 4, line 4 of my letter, I stated the following:

*"Collins, 2016, Box 5, p.66 recommends ALBST as an appropriate method for this species, **with a minimum of six trapping sessions to be undertaken** across the active season."*

However, it should be noted that the text used within Collins, 2016, Box 5, p.66 reads as follows:

*"To determine the presence/likely absence of Bechstein's bat on a site, the lure and net/harp trap method should be used and trapping surveys conducted for **a minimum of six trap nights** over the active bat season. One trap night is one lure and net or harp trap combination on one night. Therefore, six trap nights can be achieved by three nights of trapping with two sets of trap/lure combination. Ultimately the total number of traps/nights will depend on the size and nature of the potential Bechstein's bat habitat available. If the site is large with multiple woodland copses or treelines with potential for this species, then more trap nights are likely to be required."*

*Trapping surveys for Bechstein's bats should be undertaken across the active bat season to ensure that the key stages of the breeding cycle are covered, with ideally one survey pre-parturition and one survey post-parturition between May and August, at least one month apart."*

It is commendable that Advanced Bat Trapping Surveys were conducted within the site and my comments were not intended to suggest that these surveys were conducted improperly, but rather to highlight that the information required to evidence their proper implementation has not been provided.

The Ecological Impact Assessment (EclA) (EcoSupport, 2023) Section 3.3.3.5 *Bat Trapping*, paragraph 2 states that:

*"The trapping surveys were conducted on the 28<sup>th</sup> July and 13<sup>th</sup> August" and that "Traps were spread evenly throughout the site."*

There is a paucity of detail within the EclA report relating to the trapping survey methods, e.g., the number of 'trap nights' achieved, location of the trap/lure combinations during each survey, justification for any departure from the best practice guidance (as detailed above) and the lack of comprehensive survey results etc. A detailed evaluation of these findings should also be provided, which should specify how the findings relate to any potential impacts that may result from the proposed development, what mitigation will be required and how this will maintain the favourable conservation status of the species concerned. Consequently, the reader is not able to confidently determine the scale and extent of potential impacts upon Bechstein's and barbastelle bats and their supporting habitat features within the site and how these relate to the mitigation proposed.

Bechstein's and barbastelle bats are both Qualifying Features of the Singleton and Cocking Tunnels Special Area of Conservation (SAC). The proposed Site falls within the 12 km wider conservation area. Any supporting habitat for these species found within this area can be regarded as 'functionally linked' to the Singleton and Cocking SAC. Therefore, without the essential information required to fully determine the potential impacts upon these species and an appropriately detailed mitigation plan, the Competent Authority will be unable to undertake a Habitats Regulations Assessment, in accordance with their obligation under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended), to safely concludes that a significant impact upon the SAC site would be avoided.

Yours sincerely,



Nick Gray Nick Gray BSc (Hons) ACIEEM – Ecologist

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**From:** Clerk [REDACTED]  
**Sent:** Monday, April 15, 2024 9:25 AM  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Subject:** AL/11/24/OUT

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Morning

Further to our submission on the above, I have been asked to provide the attached letter as additional information which clarifies one of the points made in the original letter, as we have been requested.

Regards

Marie Singleton (Certificate in Local Council Administration – CiLCA)  
Parish Clerk/RFO

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