



ecosupport

K4 Keppel
Daedalus Park
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Lee on the Solent
PO13 9FX

3rd June 2024

Dear Mr Best,

RE: Ecology Consultee Comments for AL/11/24/OUT

This addendum serves as additional information to the ES chapter and appendices issued for Land East of Westergate regarding the impacts to Water Voles, bats and priority habitats on-site. Additionally, this serves as a response to the following comments received from Chichester District Council in respect of the application:

'Surveys:

The full species surveys have not been provided as part of the application.

The habitat and species surveys have been summarised in the EIA.

The habitats assessment was undertaken at a sub-optimal time in January. This is a significant limitation for the results of the assessment.

The EIA lacks detail in relation to the survey of Lidsey Rife chalk stream.

Impacts to invertebrates have not been assessed.

Water Vole is recorded here. The Water Vole Mitigation Guidance (2016), recommends at least two surveys to meet best practice. The survey was only one visit and did not cover the whole length of Lidsey Rife or survey upstream of the site.'

Survey Effort

Following an initial walkover completed in January 2023, the following species- specific surveys were completed to support the hybrid planning application 'AL/11/24/OUT':

- 1 full season of bat activity surveys (April-October 2023) which included all of the core habitat types identified

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as supporting potential for foraging and commuting bats (most notably wet woodland, Lidsey Rife, hedgerows and tree lines)

- 1 season (2023) of bat trapping surveys post-maternity period, and encompassing the swarming pre-hibernation period
- 1 full season of Dormouse surveys (April-September (2023)), with an additional ad-hoc check of nest tubes in October)
- A full suite of reptile surveys in Spring 2023
- eDNA survey of the adjacent pond within the church land to the north east
- A full suite of breeding bird surveys in Spring 2023
- Water Vole survey of Lidsey Rife (June 2023)

The full results of these surveys have been provided within ES Appendices 7, with ES Chapter 7 providing a summary. Additional information on the results of the bat trapping surveys are detailed below:

Trap locations

Figure 1. Location of Harp traps deployed in July and August.



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Table 1. Detailed result from each of the Harp traps deployed in July and August.

Date	Site Name	Trap	Grid Ref	comment	Total Bats	P.pip				P.pyg				M.bech				M.nat				M.daub				B.barb				Serotine			
						AM	AF	JM	JF	AM	AF	JM	JF	AM	AF	JM	JF	AM	AF	JM	JF	AM	AF	JM	JF	AM	AF	JM	JF	AM	AF	JM	JF
21/07/2023	Westergate	Trap 1	SU 94230 05196	3 BHT AT100	1				1																								
		Trap 2	SU 94197 05029	3 BHT Autobat	7	1			2	1									1	1							1						
		Trap 3	SU 94038 04672	3 BHT Autobat	5		1		4																								
13/08/2023	Westergate	Trap 1	SU 94198 05029	3 BHT Autobat	5					1	1	1				1							1										
		Trap 2	SU 94211 04688	3 BHT AT100	9	1	1		2		1	1	1			1			1														
		Trap 3	SU 94038 04672	3 BHT AT100	5				2		1			1			1																
					32																												

With the provision of the above, all detailed protected species survey results have now been provided.

BNG and Habitat Condition Assessment

The initial UKHabs survey was completed in January 2023 to identify potential for protected species ahead of the commencement of the survey season. The habitats were monitored and regularly re-assessed continuously between March-October 2023 to gain an understanding of the management regime and to identify flowering perennials that were not identified during the initial visit. As a BNG assessment was not initially provided as part of this application these details were not included. Please refer to the associated BNG report (Ecosupport, 2024) for full details of the condition assessment.

Lidsey Rife

Via email correspondence in April 2024 (see attached), it has been agreed that a pre-commencement condition of the granted planning permission should include a detailed MoRPH river condition assessment of Lidsey Rife with the aim of ensuring the quantitative retention of the river condition after installation of the proposed bridge. An updated Water Vole survey of the Rife will be completed alongside the condition assessment to check for burrows, where possible, within the area of impact (considered 50m either side of the proposed bridge). This condition can be discharged via an enhancements report.

Invertebrates

The habitats identified on-site included winter stubble/cereal crop, improved grassland, scrub, wet woodland, tree lines, a ditch system throughout, and Lidsey Rife to the east. With the exception of the woodland and the rife, the habitats on-site were heavily managed by regular mowing and were frequently used by local dog-walkers. Due to the retention of the woodland and the rife it's not considered imperative to complete detailed invertebrate surveys of these habitats.

Water Vole Mitigation

Updated Walkover

The location of bridge will be clearly marked by an engineer and/or appropriate personnel. An ecologist will then undertake an updated survey of this area, and 50m upstream and downstream, prior to works commencing. This survey should be completed between April-October when Water Voles are most likely to be active. To discourage future colonisation of the area of impact, if no evidence of Water Voles is found bankside vegetation will be strimmed to bare earth either side of the rife under supervision of a suitably experienced ecologist. All arisings will be raked off and removed from site. The habitat should then be maintain to a height below If evidence of Water Vole presence is

noted during the survey, works may need to take place under a Natural England licence and an updated mitigation strategy should be accordingly compiled and submitted to the LPA. If necessary, this will include the potential temporary displacement of Water Voles and ensuring bankside habitat incorporates plenty of areas above the predicted water level of the ditch for the creation of burrows post-development.

Ecology Buffer

A grassland buffer will be maintained within the flood zone of Lidsey Rife. The detailed planting prescriptions are provided within the associated BNG report.

During the construction phase of the development, the stream corridor will be safeguarded from potential harm through the establishment of ecological protection zones (EPZs). This will incorporate at least a six meter buffer either side of the ditch. Fencing and signage will be used to ensure that there is no encroachment from construction traffic or storage of materials. If works must encroach into this area to facilitate the development (i.e. for the installation of the public footpath) then this will be first and subsequently supervised by the site designated Ecological Clerk of Works (ECOW).

Water Pollution

A number of hazardous materials are associated with construction projects. Not only can this lead to contaminated soil, but the site is particularly vulnerable to issues with run off with risk of hazardous substances entering the ditch network and Lidsey Rife. **Table 1** contains a variety of procedures to prevent ecological implications from hazardous substances. These details will be further expanded upon by the completion of a Construction Environment Management Plan (CEMP) which will provide further detailed mitigation measures to minimize the impact of construction-related pollution on the aquatic systems within the development (which in turn will provide protection to local Water Voles from pollution events).

Table 1. Practical measures and sensitive working practices involving hazardous substances.

Issue(s) to Control	Best Practices to be adopted
Containers	• Use containers designed to minimise spills. • Ensure that containers used are appropriate to the substances contained (e.g. do not react with the substance, resistant to corrosion). • Ensure that containers are maintained in good conditions and securely closed. • Locate secondary containment store as far away from environmentally sensitive areas such as watercourses and water discharge points as possible. • Store goods away from heavily trafficked areas to avoid container damage. • In each storage area: • Ensure that only the substance(s) specified are stored. • Provide secondary containment or drip trays, and impermeable floor and bunding. • Prevent unauthorised access by providing locks to the storage areas.

Cleaning up minor spills	• Use sand, saw dust, or spill kit to absorb the spill and prevent it from spreading. • Dispose of the contaminated absorbent material as chemical waste. • Ensure that saw dust, spill kits, etc are readily accessible and of enough quantity.
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'Further species surveys required for:

Water vole- resurvey

Reptiles- resurvey

Bats- resurvey, activity and roost survey

Nesting birds- resurvey

Hedgehogs

Invertebrates

And

Lidsey Rife habitat condition and health of the chalk stream'

It is unclear what the justification for the repeating of the above surveys is. CIEEM guidance¹ on the validity of ecology surveys states that surveys completed within the last 12 months are valid in most cases. With the Water Vole, reptile, bat and nesting bird surveys completed during the last survey season, these are still considered valid.

As mentioned previously, an updated Water Vole survey will be completed prior to works commencing due to the mobile nature of this species.

Hedgehog surveys were not completed in support of this development. It is not considered proportionate to complete Hedgehog surveys for a development of this nature as Hedgehogs are assumed to be likely present in all cases. Mitigation for other protected species on-site, including a reptile capture and supervised topsoil strip provides the opportunity to search for and move any animals being directly impacted by the stripping of habitats. There is currently no statutory requirement to survey for Hedgehogs, and consideration to enhancements for Hedgehogs have, and will continue to be, considered in the design of the development as it progresses through detailed design. Features already proposed include Hedgehog highways and Hedgehog homes. Once detailed plans have been compiled, the exact locations of these can be provided.

Please see refer to page 3 in reference to invertebrate surveys and a condition assessment of Lidsey Rife.

'Biodiversity Net Gain (BNG):

At the pre app stage it was advised to undertake an BNG assessment using the Biodiversity Metric. No details of BNG have been provided.

A statutory BNG metric should be submitted so we can fully understand the habitat losses and gains.

The EIA refers to BNG in para 8.1.5.1 Dar Corridors, but no report has been attached to the application.

¹ <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

Biodiversity Net Gain is required as part of the Environment Act, NPPF and Arun Local Plan'

A BNG report has now been compiled and should be read in conjunction with this letter.

Kind regards,

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Senior Ecologist

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