

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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From: Jonathan Best <Jonathan.Best@arun.gov.uk>
Sent: Thursday, June 27, 2024 3:23 PM
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Jessica Riches <Jessica.Riches@arun.gov.uk>
Subject: AL/11/24/OUT additional ecology comments

I have reviewed the updated details of this application and have made additional ecological comments set out below.

The Case officer should undertake an Appropriate Assessment to rule out any likely adverse impacts on the Singleton and Cocking Tunnels SAC. This should be consulted on with Natural England.

BNG

The application was received by the Local Planning Authority prior to the statutory mandatory 10% BNG requirement coming into force. Therefore, a 10% net gain of biodiversity is not required. However, Policy ENV DM5 requires that development should in the first instance seek a BNG.

A BNG metric has been submitted alongside a new site layout plan SLDAP-01 Rev B which removes development from the Wet Woodland priority habitat. The BNG metric shows that there would be a net gain in both water and hedgerow units but would still result in a loss of BNG habitat units. Further opportunities for habitat enhancement should therefore be explored such as:

- Other types of habitats that could be accommodated on the site which may score higher (possibly Copse, or orchards).
- Retain some scrub along the rife and chalk streams (this would also help with ecological connectivity between the wet woodland and the Rife).
- Enhance the chalk stream itself and create/enhance habitat adjacent to it (e.g. provision of reedbeds).

Bats

A further Bat Trapping data has been provided. The Bat trapping surveys do not seem to follow the guidance for number of bat traps (only two nights were bat trapped, and best practice suggests 6).

The mitigation measures proposed below:

- Surveys are required to be repeated pre-construction?
- Bat boxes on existing retained trees
- Bat Tubes on dwellings (walls or roofs)
- Bat integrated boxes on dwellings
- Lighting condition
- Details of dark corridors – placement of dwellings being considered at RM stage
- Biodiversity CEMP

Reptiles

- Reptile translocation to be secured via condition.
- Need to ensure that suitable habitat is provided on site. Neutral grassland strip from wet woodland to the Rife would be much better. Pockets of neutral grassland within neighbourhood parks/greenspace would be helpful.
- Hibernacula should be secured by condition within translocation area.
- Scrub to be explored for areas within the neutral grassland. Areas to western boundary has identified lots of reptiles

Badgers

Pre-construction walkover survey for badgers is proposed and is acceptable to be conditioned.

Water Voles

The applicants have confirmed that they will undertake a precautionary approach to water voles to assume their presence, and as such a pre-commencement condition requiring further water vole walkover surveys along with a phased strimming approach would be suitable.

Rife / Chalk Stream

The addendum states 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.

Having reviewed the EIA and BNG condition assessment the river is classed as r2b. I think that the river is r2a because it is a chalk stream and contains UKBAP priority species. The Lidsey Rife is also classed and mapped as a statutory main river.

Condition to include planting specifications within the RM, plus a management plan to be included within HMMP and HMMR within the S106.

Birds

- Condition to secure removal of vegetation and trees outside of bird nesting season (March – September) and where not possible undertaken with an ecologist check.
- Condition to secure integrated bird boxes on dwellings
- Condition to provide barn owl locations and bird boxes on retained trees

Research has shown that the 'universal nesting brick' provides the best opportunity for successful nesting on buildings by a range of species including Swifts, House Sparrows, Starlings and Tits. Numbers of universal nesting bricks.

A ratio of at least 1:1 nest bricks per dwelling is now generally accepted as good practice however on larger developments (100+ units) a ratio of 1:2 nest bricks is acceptable as long as bat bricks are included at a ratio of 1:2.

Universal nest bricks can be installed in groups of three and should be at least 4 or five metres high. Under the eaves is the best place as birds naturally seek nesting opportunities in this location.

Hedgehogs

- Include small mammal gaps to allow Hedgehog movement networks in close boarded fencing
- Provide Hedgehog houses

Insects

The loss of habitat on site would inevitably impact insects, including bee populations therefore appropriate mitigation in the form of a condition as part of an Ecological Enhancement Plan to secure the following is advised:

- Insect / bug hotels
- Log Piles
- Bee bricks

Priority Habitat – Wet Woodland

Changes to the layout submitted now indicate that the wet woodland would be retained in full. Enhancement of the wet woodland is indicated on the BNG metric, however a condition should be imposed to secure details of planting.

Reserved Matters Commentary

The site layout plan SLDAB-01 Rev B shows that development would now not remove the wet woodland priority habitat which would support the BNG Mitigation Hierarchy and is a positive response. The layout would provide for an east-west green infrastructure link, and planting along this route should be maximised.

Conditions would need to be imposed to secure planting specifications at the reserved matters stage to ensure that planting is appropriate (i.e. native) and has sufficient growing room. Specific attention needs to be had on the wet woodland and chalk stream planting details. It is recommended that the planting details include black poplar and disease resistant elm.

S106 and Conditions

To secure the BNG proposed, a Habitat Management and Monitoring Plan should be secured through the S106.

The following conditions should be secured:

- Ecological Enhancement Plan
- Soft Landscaping
- Badger Walkover
- Reptile Mitigation
- Biodiversity CEMP
- Bat Sensitive Lighting Scheme
- Bat Sensitive dark corridors.

Regards,

Jonathan Best MCIEEM
Ecology Officer, Planning Policy

T: 01903 737579

E: jonathan.best@arun.gov.uk

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