

From: Jonathan Best
Sent: 27 January 2025 09:56
To: Planning.Responses
Cc: Simon Davis
Subject: AL/143/24/RES

Land adjacent to Woodgate Nurseries Lidsey Road Aldingbourne PO20 3SU.

I have reviewed this application with regards to ecology.

The site is partially within the Singleton and Cocking SAC 1200m HRA buffer. An appropriate assessment is required. *Applicant response:* An appropriate assessment was completed at outline stage and the conclusions were confirmed by Natural England, that the development will not impact on the SAC.

Recommendation: I recommend refusing this application until further details are provided for bats and reptiles, and details of ecological enhancement features.

The EIA by the Ecology Co-op 2021, states under limitations that the bat surveys are valid for 18 months and 2 years for reptiles. Both these surveys are now out of date and further surveys are required for bats and reptiles. *Applicant response:* The outline conditions require compliance with sections 5 and 6 of the EIA and do not require further or updated ecology surveys.

Condition 4 of AL/129/21/OUT: The development shall be carried out in complete accordance with the mitigations and enhancements set out in sections 5 and 6 of the submitted Ecological Impact Assessment (01/09/21, P3816).

Also, New native trees planted on a ratio of 2 for every 1 lost including street trees which are suitable to their location and are given space to grow; and Log piles and hedgehog boxes to be provided on-site.

The EIA recommended the following mitigations and enhancements:

- 30 new bat boxes divided into three types
- 40 new bird boxes divided into 4 types
- Sowing of SuDS features with species-rich wetland wildflower mixtures. This mixture must include no less than 20 native grass and wildflower species
- Neutral wildflower meadow grassland will be established in new greenspace areas, particularly the areas identified as 'Natural and Semi-natural open space
- containing 29 native grass and wildflower species.
- New native hedgerow planting will be used to create new boundaries with access roads and other features. These hedgerows will be planted at a density of five hedge trees per linear metre and will comprise of 50% hawthorn, with not less than five additional native tree species forming the remainder of the planting mix, including species such as blackthorn, dogwood, field maple, hazel, purging buckthorn, wild privet and guelder rose.
- Hedgehog gaps in fences.

I have reviewed the recommendations for nest bricks as part of the ecological enhancements set out in the ecological assessment. The report recommends 40 swift, sparrow, and other nesting bricks.

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 brick 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.

No plans for nest or bat boxes have been provided. I recommend following best practice and installing 50 integral swift bricks on the dwellings and a mix of boxes on retained trees.

I recommend at least 45 integral bat boxes/tubes on the dwellings and further boxes on mature retained trees. At least 4 one hibernation box would be welcome. *Applicant response: Bat and bird boxes are included within the proposals and a plan showing the locations is being prepared.*

The plans show close boarded fences for the garden boundaries. The applicant should demonstrate that hedgehog gaps will be installed for each of the fences. *Applicant response: The amended boundary treatment plans now show the inclusion of hedgehog holes to boundary fences*

The native hedgerow species mix proposed in the Play and Open Space Proposals Sheet 3 do not meet the requirements of the EIA. There is no Hawthorn, and the mix only contain 4 species in total instead of the six required.

27 trees are to be planted, only 4 tree species are proposed as replacement planting. This seems quite low for species diversity and there is no evergreen species included.

I advise adding at least one evergreen species and the Elm 'New Horizon' to the mix. The applicant should also demonstrate that the tree planting meets the required ratio of 2 to 1 replacement.

The ornamental shrub planting contains only 6 species for 156 plants. Again, I feel the diversity should be increased to benefit birds and pollinators. *Applicant response: The landscaping details have been updated to reflect the changes requested to planting details*

The landscape plans contain insufficient information difficult to clearly see the habitats being created. I could not find any wildflower meadow in the Landscape General Arrangement plan and the Landscape Illustrative Masterplan references wildflower meadow P4, but I could not identify this in the LGA plan. P6 is identified as tussocky grassland for reptiles but this area has new trees on it and is isolated from other habitats by roads so is not suitable for reptiles.

There are no reptile hibernacula or log piles included in the landscaping. *Applicant response: Detailed planting plans are being prepared for submission*

Detailed specification of the suds features have not been provided. How will they be created and what is the depth and bank ratio? Will there be permanent water held in any of the suds features?

The Lighting Plan is fine and meets best practice for bats.

I recommend the following conditions:

PCREP1
PCECOCON1
ECOLEMP1
ECOSURV1

Regards,

Jonathan Best MCIEEM

Ecology Officer, Planning Policy

