

31<sup>st</sup> July 2018

Our Ref: 3378/30072018/JT

Liz Rogers, Environment Officer,  
Environment,  
Chichester District Council,  
East Pallant House,  
Chichester,  
West Sussex PO19 1TY

**BY EMAIL**

Dear Liz,

**Land off Arundel Road, Angmering, BN16 4ET – planning application A/36/18/OUT**

**Outline planning application with some matters reserved for the erection of up to 200 dwellings with access, public open space, landscaping and sustainable drainage system (SuDS) with vehicular access point from Arundel Road, one full-sized adult football pitch and the demolition of industrial units and one residential dwelling. Departure from the Development Plan.**

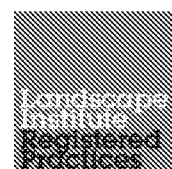
In response to your comments on this planning application in your email dated 11/07/18. Where mitigation has been outlined within the EMES (CSA/3467/03), these measures could be secured by way of planning condition and detailed at the Reserved Matters Stage. However, the DFP demonstrates good scope to deliver appropriate mitigation and enhancement measures in line with current legislation, guidance and planning policy.

| CDC Comment                                                                                                                                                                                                                                                                                                          | CSA Environmental Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>Bats</b>                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <i>"Unfortunately not enough detail has been included within the Ecological Mitigation and Enhancement strategy (June 2018) for us to be satisfied that the bat mitigation is suitable. We require that a mitigation strategy for bats is submitted to us for approval prior to determination to ensure that the</i> | <p>We have stated in paragraphs 5.5 – 5.7 of the EMES that demolition of B3 and B4 will take place under EPS licence. In line with BCT (2016) guidelines, the roosts on site are of Low Conservation Significance, as they support individual bats of common species. Therefore the BLICL or traditional route could be followed. The mitigation we have proposed is in line with the mitigation/compensation requirements for roosts of this nature:</p> <p>1) As the roosts are of low conservation significance, there will be no</p> |

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| <p><i>works would be licensable by Natural England"</i></p>                                                                                    | <p>seasonal constraint to demolition.</p> <p>2) We have set out general demolition working methods in Appendix D of the EMES to minimise the risk of killing or injury to bats.</p> <p>3) Although not a requirement for BLICL (if used), we will be providing like for like replacement in line with BCT Guidelines (2016) and the traditional EPS licensing route, with at least one replacement bat box per roost site to be lost integrated into new dwellings and additional boxes will be installed on retained trees by way of enhancement (with general siting principles and suggested products outlined within paragraph 5.7 of the EMES).</p> <p>We have updated our EMES plan (CSA/3467/111) to show locations of bat boxes to be installed in pairs on retained trees within the POS. As this is an outline application, we would not be able to provide any further information on the locations of the boxes on new dwellings until the final building layout is available.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p><i>"Hedgerows... will need to be retained and enhanced for bats. This will include having a buffer strip around the hedgerows (5m)"</i></p> | <p>We can confirm that all retained hedgerows will include a 5m wide buffer strip, and have updated the EMES to include this.</p> <p>Whilst the majority of hedgerow habitat on site is to be retained as part of the proposed scheme, some hedgerow will need to be removed to facilitate development, both to allow access to the site and provide sufficient room for development. The proposed football pitch has been agreed with Angmering Parish Council; its proposed location has been chosen to be adjacent to the Recreation Ground, and facilitate access. At the site access point, as much vegetation has been retained as possible, whilst still providing sufficient room to construct a roundabout if required at the Reserved Matters stage.</p> <p>Much of the hedgerow that is to be removed is of generally low quality. There are no TPOs in this location, nor have any of the trees to be lost as a result of the proposed development been identified as of high quality by the tree survey (see Tree Survey and Constraints Plan BHA_267_01). Referring to the Habitats Plan (CSA/3467/102), H7 is predominantly blackthorn and bramble, the majority of H4 is species-poor (only hawthorn south of B10), and H1 is a pruned domestic hedge with many ornamental species. Bat activity surveys found the majority of bat foraging and commuting activity took place along the northern and western site boundaries, with relatively low activity along H1, H7 and H8 (see Bat Habitat Utilisation Plan, CSA/3467/110).</p> |
| <p><i>Where any hedgerow is removed ... new hedgerow should be planted"</i></p>                                                                | <p>The proposed development currently includes an extensive amount of buffer planting along the majority of site boundaries which in total will create c. 1ha of new habitat, and will approximately double the amount of scrub / hedgerow habitat present on site. As set out in paragraphs 5.12 and 6.6 to 6.10 of the EMES, native species of known benefit to wildlife (similar to those in species-rich native hedgerows) will be selected to maximise the biodiversity value, and landscape design will seek to provide a range of eco-tones to offer a greater variety of opportunities for wildlife. The planting will therefore provide as much value as a foraging resource as native hedgerow planting.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|                                                                                                                                                                                                                                                        | <p>The layout of the buffer planting will also perform the same ecological function as linear hedge planting in terms of connectivity. The new planting will strengthen the habitat connectivity and dispersal routes around the edges of the site, as well as providing a valuable habitat resource to support a range of fauna, including dormice, foraging/commuting bats, badgers and nesting birds.</p> <p>Should the scheme be re-designed to include new hedgerow planting, this would have to bisect the Site, with new residential development either side, and would be subject to higher levels of disturbance than the proposed buffer planting along the margins. It is considered that this would provide significantly less benefit to the site's fauna (dormice in particular) than thicket planting along the boundaries, where it would protect and enhance the Site's highest quality habitat.</p> <p>Thicket planting adjacent to existing mature vegetation is also likely to mature and be colonised by fauna at a faster rate than new hedgerow planting through the centre of the site.</p>                                                                                                                                                                                                                                                                                                                                              |
| <p><i>"The lighting scheme for the site will need to take into consideration the presence of bats... should minimise potential impacts... by avoiding unnecessary artificial light spill through the directional light sources and shielding."</i></p> | <p>We have set out the principles for an ecologically sensitive lighting scheme in paragraph 5.9 of the EMES, and have updated this to reflect your wording. As this is an outline application, we would not be able to provide any further information at this stage until the final layout is available.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p><b>Dormice</b></p>                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p><i>"We require that prior to determination the dormouse surveys are completed and are used to construct the mitigation strategy"</i></p>                                                                                                            | <p>As for bats, as this is only an outline application, we wouldn't be able to include much more information in a mitigation strategy at this stage. We have stated in paragraphs 5.10 – 5.15 of the EMES that clearance of hedgerow /scrub will take place under EPS licence. The mitigation approach we have proposed is in line with guidance set out in the Dormouse Conservation Handbook (PTES 2006) and provides scope to mitigate for a higher dormouse population if found to be present:</p> <ol style="list-style-type: none"> <li>1) Retention of the majority of suitable dormouse habitat, with c. 0.3ha of scrub and hedgerows (c. 185m in total length) to be removed to facilitate access and construction</li> <li>2) A significant amount (c. 1ha) of native buffer planting along site boundaries using species of benefit to dormice and other fauna, providing an overall increase in available habitat on site</li> <li>3) Installation of 20 dormouse nest boxes on retained mature trees</li> <li>4) Sensitive management of retained and new habitat for benefit of dormice and other fauna, to be detailed within LEMP at RM stage</li> <li>5) Clearance of suitable habitat to be lost under EPS licence using two-stage method to minimise risk of killing / injury</li> </ol> <p>Although the full survey is not yet complete, we have now completed the majority of the survey visits (4 of 6) with no significant changes in</p> |

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|                                                                                                                                                                                                                                                             | <p>results. Further surveys are unlikely to change our mitigation approach, but should a greater number of dormice be recorded, this would of course have to be taken account of and adequately mitigated for the EPS licence application. As discussed in emails below before we submitted our updated reports, and set out in paras 5.10 – 5.15 of the EMES, our mitigation approach includes: retaining the majority of suitable habitat, significant new buffer planting, 20 dormouse boxes, and habitats managed for the benefit of dormice. We also set out a method statement for vegetation clearance within Appendix E. These methods would be secured by way of EPS licence.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p><i>"Hedgerows onsite will need to be retained and enhanced for dormice including the use of a buffer strip"</i></p>                                                                                                                                      | <p>See second point under "Bats". The proposed buffer planting shall ensure that foraging, nesting and dispersal opportunities for dormice are maintained and enhanced.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p><b>Reptiles</b></p>                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p><i>"Though it has been proposed the grass will be cut to c. 30cm during the winter, the habitat will also need some manipulation during the summer with a gradual cut down to 10cm and then gradually cleared to allow any reptiles to disperse"</i></p> | <p>We agree with this method, and have updated the EMES to make it clear that the clearance from 30cm to ground level will be staged.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p><b>Badgers</b></p>                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p><i>"A 20m buffer needs to be included around the sett and the habitat used by badgers must be retained and enhanced"</i></p>                                                                                                                             | <p>The proposed scheme broadly includes a 20m buffer from all badger tunnels, with the exception of a small slither of land where the construction footprint comes within this radius for six tunnel entrances to construct a road. A wide buffer along the site boundary is to be retained and enhanced with thicket planting, which will connect to the woodland to the north, so it is considered that all habitat the badgers are using will be retained and enhanced.</p> <p>There is no official guidance which states that development must be at least 20m from any badger sett, the English Nature 2002 guidance which set out distances for certain types of work has now been superseded. It is considered that since all the badger tunnels recorded on site are clearly concentrated along the hedgerow, and the arable field has been regularly ploughed that it is unlikely any of the tunnels extend eastwards into the construction footprint. We have updated the EMES to include an update badger survey prior to the Reserved Matters application to inform the design and apply for an EPS licence, in the event that a sett should be created within the construction footprint or close enough to be impacted by development.</p> |
| <p><i>"Any deep pits or holes onsite during the works... there should be a secured plank within them to allow a means of escape"</i></p>                                                                                                                    | <p>We agree with this method, and have updated our wording in the EMES to include the word "secured".</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p><i>"Prior to start on site a badger survey should be undertaken ... new mitigation strategy [if</i></p>                                                                                                                                                  | <p>We have stated this in paragraph 5.19 of the EMES, and have updated it to include an update badger survey prior to the Reserved</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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| <i>required]"</i>                                                                                                                                                                                               | Matters application to inform the design.                                     |
| <b>Nesting birds</b>                                                                                                                                                                                            |                                                                               |
| <i>"Any works to the trees or vegetation clearance should only be undertaken... 1<sup>st</sup> March – 1<sup>st</sup> October... [or] an ecologist will need to check the site before any works take place"</i> | We agree with this method, and will update the EMES to reflect those timings. |
| <b>Enhancements</b>                                                                                                                                                                                             |                                                                               |
| <i>We will require that further details regarding these [enhancements] are included within the Landscape and Management Plan"</i>                                                                               | We can confirm that further details will be provided within the LEMP.         |

The information provided above has addressed the points raised, and I trust will enable you to support this planning application. Please refer to the Ecological Impact Assessment, separate confidential Badger Report and Ecological Mitigation and Enhancement Strategy documents for further information.

Yours sincerely,



Jessica Tait  
Ecologist, CSA Environmental