

**Land at the former Rising Sun Public House
351 Chichester Road
North Bersted
Bognor Regis
PO21 5AN**

Updated Preliminary Ecological Appraisal

Ref: R2679/b

May 2021

 **JOHNWENMAN**
ecological consultancy

1 Diesel House, Honey Hill, Wokingham, Berkshire RG40 3BU

Registered office: 100 New Wokingham Road, Crowthorne, Berkshire RG45 6JP where you may look at a list of members' names.

1	SUMMARY	3
2	INTRODUCTION	5
2.1	Overview	5
2.2	Site Location and Context	5
2.3	Report format	5
3	PLANNING POLICY BACKGROUND	7
3.1	National Planning Policy	7
3.2	Local Planning Policy	8
4	LEGISLATIVE BACKGROUND – PROTECTED SPECIES	9
4.1	Amphibians	9
4.2	Reptiles	9
4.3	Birds	10
4.4	Bats	10
4.5	Badgers	10
4.6	Otters	11
4.7	Hazel Dormice	11
4.8	Water Voles	12
4.9	Invasive Non-Native Plants	13
4.10	Injurious Weeds	13
4.11	Wild Mammals	13
5	SURVEY METHODS	14
5.1	Phase 1 Habitat Survey	14
5.2	Background Data Search	14
5.3	Survey Constraints	14
6	BACKGROUND DATA SEARCH FINDINGS	15
7	PHASE 1 HABITAT SURVEY FINDINGS	17
7.1	Site Overview	17
8	DISCUSSION	20
8.1	Assessment of Existing Ecological Value	20
8.2	Impact of Proposals	22
9	RECOMMENDATIONS	26
9.1	Bats	26
9.2	Mammals	26
9.3	Nesting Birds	27
9.4	Ecological Enhancement	27
10	REFERENCES	28
	APPENDIX 1 – SITE PHOTOGRAPHS	29
	APPENDIX 2 – PHASE 1 HABITAT SURVEY PLAN	32
	APPENDIX 3 - PLANT SPECIES RECORDED DURING THE SURVEY	35
	APPENDIX 4 – PROPOSED SITE LAYOUT	36

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

1 SUMMARY

- 1.1.1** John Wenman Ecological Consultancy LLP was commissioned by Jonathan Phililps to undertake an updated preliminary ecological appraisal of land to the rear of the former Rising Sun Public House, in North Bersted, West Sussex in connection with a planning application to be submitted to Arun District Council seeking consent for the redevelopment of the site. The development proposal includes the construction of seven new dwellings.
- 1.1.2** The site covered an area of approximately 0.2 hectares formerly the garden and car parking for the former public house. The habitats present comprised a large area of hard standing with patches of ephemeral and short perennial vegetation and dense scrub. The southern half of the site comprised primarily of dense scrub with a footpath that had been recently cleared to allow access onto the site. A few scattered trees were present around the boundaries and across the centre of the site. The habitats were typical of infrequently managed urban sites and considered to be of no special ecological value. Data held by the Sussex Biodiversity Records Centre shows that the site is not designated for its wildlife interest and no records of legally protected or notable species are held for the site.
- 1.1.3** During the site walkover, the habitats were found to be characteristic of unmanaged urban sites but did not support mosaics of habitats with potential to support a diversity of invertebrates typical of ecologically valuable brownfield sites. The scattered trees and scrub on site are of ecological value at the site level as a resource for nesting birds; however, the native tree and scrub species were commonly occurring species of no conservation importance and lack conservation importance beyond the scale of the site.
- 1.1.4** Proposed habitat and protected species mitigation measures and recommendations have been outlined including:
- Removal of trees and scrub outside of the nesting bird season or if unavoidable following a nesting check by an ecologist;
 - Sensitive use of lighting to avoid impacts to bats; and

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

- 3 -

- Incorporation of ecological enhancements in the scheme to benefit wildlife adapted to urban environments such as swift boxes, hedgehog tunnels and bat boxes.

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

- 4 -

2 INTRODUCTION

2.1 Overview

2.1.1 John Wenman Ecological Consultancy LLP was commissioned by Jonathan Phillips to undertake an updated preliminary ecological appraisal of the land to the rear of the former Rising Sun Public House at 351 Chichester Road in North Bersted, West Sussex.

2.1.2 The survey was commissioned in connection with proposals to seek planning permission for the proposed redevelopment of the site to housing. The proposal includes the construction of seven new dwellings (referred to proposed site layout in **Appendix 4**). This survey is an update to preliminary ecological appraisals undertaken in 2012 and 2018.

2.2 Site Location and Context

2.2.1 The survey site –previously the garden and car park for the former Rising Sun Public House - covers an area of approximately 0.2 hectares and is situated to the east of Chichester Road in the centre of North Bersted, West Sussex (OS grid reference SU 922007). The former public house has been converted into a Tesco Express Store.

2.2.2 The site is surrounded by residential properties and their associated gardens on all sides within the urban area of North Bersted situated approximately two kilometres to the north of the centre of Bognor Regis. Beyond the northern edge of North Bersted, approximately 600 metres from the site, the land is predominantly open agricultural fields with a network of hedgerows.

2.3 Report format

2.3.1 There follows: an overview of the planning policy background in Section 3 and of the protected species legislation in Section 4; details of the survey methods in Section 5; background data search findings in Section 6; Phase 1 habitat survey findings in Section 7; a discussion of the survey findings in Section 8; with recommendations being presented in Section 9. The appendices present: site photographs (**Appendix 1**); a Phase 1 habitat survey plan with associated target notes (**Appendix 2**); a plant species list

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

- 5 -

recorded during the survey (**Appendix 3**); and a proposed site layout (**Appendix 4**).

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

- 6 -

3 PLANNING POLICY BACKGROUND

3.1 National Planning Policy

3.1.1 The ODPM Circular 06/2005 provides guidance on the application of the law relating to planning and nature conservation stating that *‘the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat.’*

3.1.2 The revised National Planning Policy Framework (NPPF), published in February 2019, sets out the Government's planning policies for England and how they should be applied. Section 15 of the NPPF sets out the approach local authorities should adopt to conserve and enhancing the natural environment when preparing planning policy and when considering planning applications. Paragraph 175 sets out the principles local authorities should apply when determining planning applications as follows:

175. When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁵⁸ and a suitable compensation strategy exists; and*

- d) *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.*

3.2 Local Planning Policy

3.2.1 Arun District Council's Local Plan guides development for the district from 2011 to 2031. The Plan provides guidance on how the natural environment and landscape should be considered as part of development. The site is within 5km of Pagham Harbour SPA and therefore Policy ENV DM2 is relevant. The consideration of biodiversity in planning decisions within Arun District is highlighted in the Local Plan as follows:

Policy ENV SP1

Natural Environment

Arun District Council will encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environment through the development process and particularly through policies for the protection of both designated and non-designated sites. Where possible it shall also promote the creation of new areas for habitats and species. In relation to designated sites, development will be permitted where it protects sites listed in Tables 17.1-17.7 that are recognised for the species and habitats contained within them.

Policy ENV DM2

Pagham Harbour

- a. Within Zone A (0-100m from the boundary) as identified on the Policies Maps, development will only be permitted in exceptional circumstances where the developer is able to demonstrate there will be no detrimental effects on Pagham Harbour, including non-native species and the water environment. Regard shall also be had to tests 1-4 as set out in Policy DM1 (Designated Sites of Biodiversity or Geological Importance).
- b. Within Zone B (0-5km) for all new residential development and development which is likely to have an impact on Pagham Harbour will be required to:
 - i. Make developer contributions towards the agreed strategic approach to access management at Pagham Harbour.
 - ii. create easily accessible new green spaces for recreation within or adjacent to the development site. These shall be capable of accommodating the predicted increases in demand for local walking, including dog walking. Good pedestrian links shall be provided between housing areas and new and existing green space in order to discourage car use.
- c. Major developments (as defined in the ODPO 1995 as amended^(M)) taking place outside Zone B and close to its boundary will be considered on a case by case basis to determine any potential effects on Pagham Harbour, and the need for any avoidance or mitigation measures.

John Wenman Ecological Consultancy

4 LEGISLATIVE BACKGROUND – PROTECTED SPECIES

4.1 Amphibians

4.1.1 The seven native species of amphibian receive protection under the Wildlife & Countryside Act 1981 (as amended). The four widespread and common amphibians (common frog, toad, smooth and palmate newts) receive limited protection – making their sale illegal.

4.1.2 Of the seven native amphibian species, the widespread great crested newt receives full protection under the Wildlife & Countryside Act 1981 (as amended) and under the Conservation of Species and Habitats Regulations 2017 ('Habitat Regulations') (as amended). These make it illegal to:

- Intentionally or recklessly kill, injure or take a great crested newt;
- Possess or control any live or dead specimen or anything derived from a great crested newt;
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a great crested newt;
- Intentionally or recklessly disturb great crested newts; in particular, any disturbance which is likely to impair their ability to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating animals, to hibernate or migrate.

4.1.3 The great crested newt and common toad are listed as being of principal importance for the conservation of biodiversity in England, under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, (commonly referred to as a UK Priority Species).

4.2 Reptiles

4.2.1 The four widespread reptiles most likely to be encountered (adder, grass snake, slow worm and viviparous lizard) are protected under the Wildlife & Countryside Act 1981 (as amended). The Act makes it an offence to intentionally kill, injure, possess or sell any of the species.

4.2.2 The four reptile species are listed as being of principal importance for the conservation of biodiversity in England, under Section 41 of the Natural

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

Environment and Rural Communities Act 2006, (commonly referred to as a UK Priority Species).

4.3 Birds

4.3.1 All wild birds are protected under the Wildlife & Countryside Act 1981 (as amended). The Act makes it an offence to kill, injure or take a wild bird or to damage or destroy the nest of a wild bird whilst in use or being built.

4.3.2 Less common bird species of conservation concern, such as the barn owl and kingfisher, are listed on Schedule 1 of the Act, which makes it an offence to disturb the birds whilst nesting also.

4.4 Bats

4.4.1 All British bat species are fully protected by the Wildlife & Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 ('Habitat Regulations') (as amended). In summary, the legislation combined makes it an offence to:

- Damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a bat;
- Deliberately, intentionally or recklessly disturb bats; in particular any disturbance which is likely to impair the ability of bats to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating bats, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species;
- Deliberately kill, injure or take any bat.

4.5 Badgers

4.5.1 Badgers are protected by the Protection of Badgers Act 1992. The Act makes activities such as development that would harm or disturb badgers or damage, obstruct or destroy their setts illegal. If badgers are to be affected by the proposed development, activities can be undertaken only under a licence issued by Natural England. The issue of a licence would be subject to the development of a suitable mitigation strategy.

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

- 10 -

4.6 Otters

4.6.1 Otters are fully protected by the Wildlife & Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 ('Habitat Regulations') (as amended). In summary, the legislation combined makes it an offence to:

- Damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by an otter;
- Deliberately, intentionally or recklessly disturb otters; in particular any disturbance which is likely to impair the ability of otters to survive, breed or reproduce or nurture their young; or to affect significantly the local distribution or abundance of the species;
- Deliberately kill, injure or take any otter.

4.7 Hazel Dormice

4.7.1 Hazel dormice receive full protection under the Wildlife & Countryside Act 1981 (as amended) and under the Conservation of Habitats and Species Regulations 2017 ('Habitat Regulations') (as amended). These make it illegal to

- Intentionally or recklessly kill, injure or take a dormouse;
- Possess or control any live or dead specimen or anything derived from a dormouse;
- Damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a dormouse;
- Intentionally or recklessly disturb dormice; in particular any disturbance which is likely to impair their ability to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating animals, to hibernate or migrate.

4.7.2 The government's statutory conservation advisory organisation, Natural England, is responsible for issuing European Protected Species licences that would permit activities that would otherwise lead to an infringement of

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

- 11 -

the Habitat Regulations. A licence can be issued if the following three tests have been met:

- **Regulation 55(9)(a)** - there is “no satisfactory alternative” to the derogation, and;
- **Regulation 55(9)(b)** - the derogation “will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range” and;
- **Regulation 55(2)(e)** - the derogation is for the purposes of “preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment”.

4.7.3 Local authorities have a statutory duty under Regulation 7(3e) of the Habitat Regulations to have regard to requirements of the Habitats Directive in the exercise of their functions. The Council must therefore consider and determine whether these three tests are likely to be satisfied by an application affecting European protected species before granting planning permission. **N.B. the requirements set out in 4.7.2 and 4.7.3 apply to development that would affect bats, great crested newts and otters, which are European Protected Species also.**

4.8 Water Voles

4.8.1 Since April 2008, water voles have received full protection under Section 9 of the Wildlife & Countryside Act 1981 (as amended). This makes it an offence to intentionally kill, injure or take water voles or to possess or control live or dead water voles or derivatives. It is an offence to intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection or intentionally or recklessly disturb water voles whilst occupying a structure or place used for that purpose.

4.8.2 The water vole is listed as being of principal importance for the conservation of biodiversity in England, under Section 41 of the Natural Environment and Rural Communities Act 2006, (commonly referred to as a UK Priority species).

4.9 Invasive Non-Native Plants

- 4.9.1** The Wildlife and Countryside Act 1981 (as amended) provides the primary controls on the release of non-native species into the wild in Great Britain. It is an offence under section 14(2) of the Act to 'plant or otherwise cause to grow in the wild' any plant listed in Schedule 9, Part II. The species listed in the Act includes Japanese knotweed (*Fallopia japonica*), giant hogweed (*Heracleum mantegazzianum*) and Himalayan balsam (*Impatiens glandulifera*).

4.10 Injurious Weeds

- 4.10.1** Five native plants are listed as injurious weeds under the Weeds Act 1959: common ragwort (*Senecio jacobaea*), spear thistle (*Cirsium vulgare*), creeping or field thistle (*Cirsium arvense*), broad-leaved dock (*Rumex obtusifolius*) and curled dock (*Rumex Crispus*). The Act means it is not an offence to have these weeds growing on your land and species such as ragwort have significant conservation benefits. However, they must not be allowed to spread to agricultural land, particularly grazing areas or land which is used to produce conserved forage. Enforcement notices can be issued following complaints requiring landowners to take action to prevent the spread of these weeds.

4.11 Wild Mammals

- 4.11.1** Under the Wild Mammals (Protection) Act 1996 it is an offence to intentionally inflict unnecessary suffering, as specified by the Act, on any wild mammal.

5 SURVEY METHODS

5.1 Phase 1 Habitat Survey

5.1.1 An ecological walkover survey was undertaken on the 13th November 2012, 8th May 2019, and updated on the 12th November 2020 by a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). During the survey, the habitats present were noted and plotted on a site plan (**Appendix 2**) using definitions based on the standard Phase 1 Habitat survey definitions (JNCC 2010). Key features of the site were photographed (**Appendix 1**) and plotted on the site plan using target notes (**Appendix 2**).

5.1.2 Any features of ecological importance were recorded, and plant species observed during the survey noted (**Appendix 3**). Particular attention was given to any evidence of the presence of protected species and the site's potential to support such species and those of conservation importance (as defined under Section 41 of the NERC Act 2006).

5.2 Background Data Search

5.2.1 The Sussex Biodiversity Records Centre (SxBRC) were commissioned to undertake an updated search of all data they held on protected and notable species and designated sites (statutory and non-statutory) within a two kilometre radius of the survey site.

5.2.2 The Multi-Agency Geographic Information for the Countryside (MAGIC) website was referred to for pre-existing data on Habitats of Principal Importance (HPI) (as defined under Section 41 of the NERC Act 2006) and to understand the nature of surrounding habitats.

5.3 Survey Constraints

5.3.1 Open access was available to the site. The survey was subject to seasonal constraints; not all plant and animal species are visible throughout the year and therefore the report represents a snapshot of the site at the time of the survey only. The plant species list presented should not be considered a comprehensive list of species present.

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

- 14 -

6 BACKGROUND DATA SEARCH FINDINGS

- 6.1.1** The survey site was not shown to be designated for its wildlife value following a search of existing databases; however, The Brooks, a Local Nature Reserve is situated in the search area and is situated just over one kilometre to the north east of the site. The Nature Reserve covers an area of approximately 19 hectares and has a range of habitats including meadows, reed beds and ditches, ponds and newly planted floodplain woodland. Extensive areas of floodplain grazing marsh are located approximately 650 metres to the north of the site.
- 6.1.2** No records of protected or notable species are held for the survey site. In the surrounding area, there are records of several protected and notable species within the two kilometre search, including 42 species of European importance as summarised from 6.1.3 below:
- 6.1.3** Sixty four species of birds - identified as notable for Sussex - including the Eurasian bittern (*Botaurus stellaris*), stone-curlew (*Burhinus oedicnemus*), woodlark (*Lullula arborea*) and marsh warbler (*Acrocephalus palustris*) – have been recorded within the search area.
- 6.1.4** A number of nationally and locally notable plant species have been recorded including annual beard-grass (*Polypogon monspeliensis*), hair-like pondweed (*Potamogeton trichoides*), corn parsley (*Petroselinum segetum*), chamomile (*Chamaemelum nobile*), autumn lady's tresses (*Spiranthes spiralis*) and black poplar (*Populus nigra subsp. betulifolia*).
- 6.1.5** Notable invertebrates including, wall butterfly (*Lasiommata megera*), long-winged cone-head (*Conocephalus fuscus*) and stag beetle (*Lucanus cervus*) have been recorded within a 2km radius of the site.
- 6.1.6** Four reptile species: slow worm (*Anguis fragilis*), grass snake (*Natrix natrix*), common lizard (*Lacerta vivipara*) and adder (*Vipera berus*) have been recorded within a two kilometre radius of the site. The closest record dates from 2012 and is a slow worm in a garden on Sherwood Road, which is approximately 380 metres to the south east of the site. Common lizard and adder have been recorded at Black Down approximately 650 metres to the

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

- 15 -

south east. The closest record for grass snake is from a site along Aldingbourne Rife more than one kilometre to the south east of the site.

- 6.1.7** Five amphibian species have been recorded in the search area: great crested newt (*Triturus cristatus*), common toad (*Bufo bufo*), smooth newt (*Lissotriton vulgaris*), palmate newt (*Lissotriton helveticus*) and common frog (*Rana temporaria*). There is an historical record (dating from 2004) for the fully protected great crested newt at Laurel Close just over one kilometre to the east of the survey site. More recent records (in 2016) of the smooth newt, palmate newt and common frog have been found in waterbodies surrounded by arable land 1.5km to the west of the site.
- 6.1.8** Terrestrial mammal records include brown hare (*Lepus europaeus*), European water vole (*Arvicola amphibius*), West European hedgehog (*Erinaceus europaeus*) and eight bat species. An adult hedgehog and two juveniles have been recorded only 70 metres to the south east of the site in 2017 and there are 37 records found within a 2km radius. The water vole has been recorded at a site approximately 370 metres to the northeast of the site in 2012 and more recently from a site 430 metres to the northeast in 2018.
- 6.1.9** The bat species recorded within the search area include: barbastelle (*Barbastella barbastellus*), common pipistrelle (*Pipistrellus pipistrelles*), soprano pipistrelle (*Pipistrellus pygmaeus*), noctule (*Nyctalus noctula*), serotine (*Eptesicus serotinus*), Daubenton's bat (*Myotis daubentonii*), whiskered bat (*Myotis mystacinus*), brown long-eared bat (*Plecotus auritus*) and grey long-eared bat (*Plecotus austriacus*). At least nine bat roosts have been recorded within the area of at least three species: common pipistrelle, soprano pipistrelle and long-eared.

7 PHASE 1 HABITAT SURVEY FINDINGS

7.1 Site Overview

- 7.1.1** The survey site comprised of the former garden of a public house to the south of the site, which was now an area of impenetrable dense scrub. A cypress hedge was still visible that had formerly been the northern boundary of the garden. The northern end of the site was previously used as the car park of the public house and was primarily hard standing with a hedge line along the western boundary, dominated by scrub and scattered trees. Buddleia dominated the northern boundary with the neighbouring property.
- 7.1.2** Wooden fences formed the site's boundary with neighbouring gardens to the south, south east, and west, and a stone wall formed the site's boundary to the north, with a new wooden fence forming the boundary with the Tesco store to the south east of the site (formerly the public house).
- 7.1.3** The following Phase 1 habitat types were observed during the survey: dense scrub, introduced shrubs, ephemeral/short perennial vegetation, scattered trees and other habitat.
- 7.1.4** The habitat types are detailed below; the site photographs are in **Appendix 1**, their distribution is shown on the site plan with associated target notes with detailed species compositions are described in **Appendix 2**, and a list of species recorded in **Appendix 3**.

Dense Scrub (DS1, DS2 DS3, OH1, TN1, TN2 & TN3)

- 7.1.5** The southern half of the site was overgrown with dense bramble (*Rubus fruticosus* agg.), which was mostly impenetrable (**Photograph 1; DS1**). Butterfly-bush (*Buddleia davidii*) and hazel (*Corylus avellana*) were growing amongst the bramble occasionally and pendulous sedge (*Carex pendula*) was rarely present. A footpath had been recently cleared to allow access onto the site which comprised of bare ground (**Photograph 2; OH1**). A small patch of grassland was growing in the cleared area and included: cock's-foot (*Dactylis glomerata*), creeping bent (*Agrostis stolonifera*), fescue (*Festuca* sp.) and dove's-foot crane's-bill (*Geranium molle*) (**Photograph 3; TN1**).

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

- 17 -

- 7.1.6** An old section of brick wall was present beneath the bramble, which was covered with ivy (**Photograph 4; TN2**)
- 7.1.7** An old, dilapidated shed was present underneath the bramble towards the north western end of the scrub (**Photograph 5; TN3**).
- 7.1.8** The western boundary of the former car park had a stretch of dense scrub growing beneath the trees (**Photograph 6; DS2**) and species within the scrub included bramble (*Rubus fruticosus* agg.), common chickweed (*Stellaria media*), cleavers (*Galium aparine*) and herb Robert (*Geranium robertianum*). The scrub extended into the hard standing in the north western corner (**Photograph 7; DS3**) and other plant species included soft brome (*Bromus mollis*), common nettle (*Urtica dioica*), butterfly-bush (*Buddleia davidii*) and dove's-foot crane's-bill (*Geranium molle*).

Ephemeral/Short Perennial Vegetation (ESP1)

- 7.1.9** Across the former car park, patches of ephemeral/short perennial vegetation and tall ruderal vegetation had established (**Photograph 8; ESP1**) with species such as ribwort plantain (*Plantago lanceolata*), Yorkshire fog (*Holcus lanatus*), dove's-foot crane's-bill (*Geranium molle*), greater plantain (*Plantago major*), soft brome (*Bromus mollis*), dandelion (*Taraxacum officinale* agg.), yarrow (*Achillea millefolium*), smooth sow-thistle (*Sonchus oleraceus*), herb Robert (*Geranium robertianum*), Canadian fleabane (*Conyza canadensis*), common chickweed (*Stellaria media*), nettle (*Urtica dioica*), ground ivy (*Glechoma hederacea*), red deadnettle (*Lamium purpureum*), groundsel (*Senecio vulgaris*), cock's foot (*Dactylis glomerata*) and a willowherb. Moss was also growing over the western side of the car park.

Scattered Broadleaved Trees (SBW1 & SBW2)

- 7.1.10** There were scattered trees amongst the scrub on the western site boundary and along the southern side of the car park. Species included sycamore (*Acer pseudoplatanus*), elder (*Sambucus nigra*), silver birch (*Betula pendula*), cherry (*Prunus* sp.) and ash (*Fraxinus excelsior*) (**Photographs 9 & 10; SBW1**). Old bird nesting material was visible amongst the trees (**Photograph 11**).

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

- 7.1.11** There was a coppiced hazel (*Corylus avellana*) with light ivy (*Hedera helix*) cover along the southern boundary of the former garden amongst the dense scrub (**Photograph 12; SBW2**).

Scattered Coniferous Trees (SCW1 & SCW2)

- 7.1.12** A strip of cypress trees was present across the centre of the site separating the former pub garden and car park (**Photograph 13; SCW1**).
- 7.1.13** A few conifers were present towards the south eastern corner of the site amongst the dense scrub (**Photograph 14, SCW 2**).

Introduced Shrubs (IS1 & IS2)

- 7.1.14** A patch of introduced shrubs had established in the centre of the hard standing comprising butterfly-bush (*Buddleia davidii*), pampas grass (*Cortadina selloana*), bramble (*Rubus fruticosus* agg.), mallow (*Malva* sp.), foxglove (*Digitalis purpurea*), dock (*Rumex* sp.), sow thistle (*Sonchus* sp.), herb Robert (*Geranium robertianum*), Yorkshire fog (*Holcus lanatus*) and a spurge (*Euphorbia* sp.) (**Photograph 15; IS1**). There was a pile of soil and rubble amongst the vegetation, which was solid with limited crevices (**Photograph 16**).
- 7.1.15** A few introduced shrubs were growing around the south eastern corner of the former garden and included species such as spotted laurel (*Aucuba japonica*), cypress and box (*Buxus sempervirens*) (**Photograph 17; IS2**).

Incidental Fauna

- 7.1.16** During the survey, incidental bird sightings were noted which included: blackbird (*Turdus merula*) and house sparrow (*Passer domesticus*). A fox (*Vulpes vulpes*) was seen walking off the site along a gap in the southern boundary.

8 DISCUSSION

8.1 Assessment of Existing Ecological Value

Habitats

8.1.1 Data held by the Sussex Biodiversity Records Centre shows that the site is not designated for its wildlife interest and that no records of legally protected or notable species are held for the site.

8.1.2 The site consisted of habitats typical of unmanaged urban habitats with encroaching introduced shrubs with invasive properties, and dense scrub. The habitats supported low numbers of native grass and herbaceous species. The scattered trees and scrub are of ecological value at the site level as a resource for nesting birds; however, the native tree species were commonly occurring species of no conservation importance and lack conservation importance beyond the scale of the site.

Amphibians

8.1.3 There are no waterbodies on site and an examination of Ordnance Survey mapping and data received from SxBRC for the area reveals that the survey site is over one kilometre from a known historical great crested newt record. Furthermore, within a 500 metre radius, there are no water bodies shown on mapping. Great crested newts typically utilize terrestrial habitats within a 500 metre radius of breeding ponds, with the key habitats for the majority of the population being 250 metres from breeding ponds (Langton *et. al.* 2001). The dense scrub may be used as sheltering habitat for amphibians but the site is isolated from other suitable habitat within the densely residential setting. Therefore, the terrestrial habitats present on site, although potentially suitable terrestrial habitat for great crested newts, are considered unlikely to be used by them or other amphibian species, including conservation priorities such as common toad (*Bufo bufo*).

Bats

- 8.1.4** The scattered trees offer limited commuting and foraging habitat for bats. The scattered trees lacked any visible roosting features (e.g. woodpecker holes, rot holes, lifted bark etc.) for bats. At least eight bat species have been recorded within a 2km radius of the site, however, the surrounding urban environment and light spill from nearby commercial and residential properties restricts bat species to those adapted to urban environments.

Hazel Dormice

- 8.1.5** The site offers no connected habitat suitable for hazel dormice. There are no records for the hazel dormouse (*Muscardinus avellanarius*) in the search radius and although there was dense scrub on site that could support dormice in areas where they are present, it did not connect to any suitable corridors for dormice to use to move onto the site, and as such they are highly unlikely to be present.

Reptiles

- 8.1.6** The habitat visible on site was structurally poor and did not provide potential sheltering or foraging opportunities for reptiles such as the slow worm (*Anguis fragilis*), grass snake (*Natrix natrix*) common lizard (*Zootoca vivipara*), and adder (*Vipera berus*), which are UK Priority Species and legally protected. There are pre-existing reptile records for slow worm (*Anguis fragilis*) for a site approximately 400 metres to the south east, for the common lizard (*Zootoca vivipara*) and adder (*Vipera berus*) at a site approximately 650 metres to the south east and for grass snake (*Natrix natrix*) for a site over one kilometre to the south; however, the habitats on the footprint of the development currently provides very poor habitat for reptiles.

Badgers (and Other Mammals)

- 8.1.7** The Records Centre holds no records of the badger (*Meles meles*) within a 2km radius of the site; and there were no signs of badgers on the site. The data search confirms the presence of hedgehogs in close proximity to the

site and therefore hedgehogs using neighbouring garden plots for foraging could utilize the scrub for shelter.

Nesting birds

- 8.1.8** The scattered trees and dense scrub on site provide nesting opportunities for common and widespread garden birds; the notable species: house sparrow was recorded on site. However, the site is considered highly unlikely to be of ecological value to communities of birds of conservation beyond the site level.

Invertebrates

- 8.1.9** The former car park with patches of dense scrub and introduced shrubs are unlikely to provide the structural and botanical diversity required to support a diverse invertebrate fauna. The site could support communities of commonly found species typical of unmanaged, previously developed land.

8.2 Impact of Proposals

- 8.2.1** The proposals involve the construction of seven new dwellings and associated landscaping (refer to proposed site layout in **Appendix 4**).

Statutory Designated Sites

- 8.2.2** The site is within 5km of the Pagham Harbour SPA (refer to Local Plan Policy in Section 3.2) and Bognor Reef RAMSAR and SSSI is situated just over 2 kilometres to the south of the site, and therefore the site falls within the SPA Impact Risk Zone. The proposal falls into the residential impact category as there will be a net gain in residential units, which will require the local planning authority to consult Natural England. However, given the nature and scale of the proposal, it is unlikely that direct impacts associated with construction of seven new houses within an urban area just under 5km from the SPA will have an adverse impact on the habitats of this nationally designated site or on the Bognor Reef RAMSAR and SSSI also.

Habitats

- 8.2.3** The proposals will result in the clearance of scrub habitats and vegetated areas of primarily invasive and dominant scrub species that are of limited ecological value and low diversity, and therefore the development is considered highly unlikely to have any impacts on habitats of conservation importance.

Amphibians

- 8.2.4** Taking into account the lack of recent and local great crested newt records, the absence of waterbodies on site and within the surrounding area, and the low quality habitat on site for amphibians, the proposals are considered unlikely to adversely impact on this European protected species and other amphibian species.

Bats

- 8.2.5** The dense scrub will offer some foraging habitat for bats, but the lack of plant and structural diversity will reduce the invertebrate densities and thereby limit the foraging quality of the habitat for bats.
- 8.2.6** As insects are attracted to artificial lighting, several species of bats, including species such as the pipistrelles, noctule, Leisler's bat and serotine, have been shown to be attracted to lighting to forage (Stone *et. Al.* 2015b). Several species of bats, particularly the slower flying species, such as the long-eared bats and *Myotis* species, have on the other hand been shown to avoid lighting, possibly as a consequence of the risk of increased predation from diurnal raptors (Stone *et. Al.* 2015a), although several species may be sensitive to increased lighting particularly UV light, and lighting may disrupt visual foraging behaviour in groups such as long-eared bats (Fure 2006). Furthermore, the artificial attraction of insects to lighting may have an adverse impact on the availability of insects in nearby habitats and therefore an impact on the foraging success of bats that avoid lighting (refer to recommendations in **Section 9.1**).

Hazel Dormice

- 8.2.7** The dense bramble on site is suitable nesting and foraging habitat for dormice but the site is isolated and fragmented from other suitable habitat. The urban environment and lack of hazel dormouse records in the local area indicates that the likelihood of hazel dormice on site is considered to be very low and therefore the impacts are considered to be negligible.

Reptiles

- 8.2.8** The habitat on site was considered to be unsuitable for reptiles and therefore there will be no adverse impacts on reptiles. In the long-term, the ecological functionality of local reptile populations would not be affected by the works.

(Badgers (and Other Mammals))

- 8.2.9** There was no evidence of badger signs, and the isolated nature of the site from any suitable foraging habitat suggests that badgers are not present on site. The high number of records and proximity increases the likelihood of the presence of hedgehogs on site using the scrub for shelter and therefore precautions are recommended during site clearance (refer to recommendations in **Section 9.2**). Fox were seen on site and are likely to be sheltering under the dense bramble.

Nesting Birds

- 8.2.10** The scrub and scattered trees provide nesting opportunities for common and widespread garden bird species, and therefore the removal of these habitats may lead to the loss of nesting and foraging habitat and as such precautions must be adopted and mitigation and compensation for habitat loss provided (refer to recommendations in **Section 9.3**).

Invertebrates

- 8.2.11** The site currently is unlikely to support important assemblages of invertebrate of conservation importance and therefore the proposals are not considered likely to significantly affect invertebrate populations. There is scope within the landscaping scheme to enhance the habitat for invertebrates in order to help achieve a net gain in biodiversity (refer to recommendations in **Section 9.4**).

9 RECOMMENDATIONS

9.1 Bats

- 9.1.1** During construction, external lighting should be kept to a minimum and if security lighting is required, this should be controlled by passive infra-red motion sensors with no light spillage on to any existing linear features likely to be used by bats, such as hedges and scattered trees on site.
- 9.1.2** In the long-term, dark corridors should be retained on site along existing hedge and scattered tree lines thereby maintaining foraging and commuting corridors for bats across the site. Exterior lighting on houses should be avoided particularly on the rear elevations backing on to the hedge with trees, but where essential, lighting should be controlled using passive infra-red sensors so that lighting operates only when necessary. If lighting as part of the development is installed on site, it should be kept to a minimum and any essential lighting should be low level only e.g. lighting bollards, shielded above to avoid upward light spill and emit low UV light levels e.g. warm LED lighting.

9.2 Mammals

- 9.2.1** In order to avoid any harm or injury to small mammals such as hedgehogs sheltering in the scrub, clearance should be carried out carefully and in a two-stage process. The scrub should be cut down to 300mm from ground level, inspected for sheltering mammals by an ecologist, and then removed to ground level following confirmation of an absence of any animals. If hedgehogs are found, they should be moved to a protected area of the site by the ecologist and allowed to disperse freely overnight.
- 9.2.2** Any stored building materials such as bricks etc. that might offer shelter for small mammals should be kept raised off the ground on pallets to reduce the risk of them being used as shelter by small mammals. During the course of development, any open excavations and trenches should be backfilled before nightfall, or alternatively, escape ramps should be installed to allow animals to escape if they become trapped.

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

- 26 -

9.3 Nesting Birds

- 9.3.1** The scrub and tree removal should be completed outside of the peak bird nesting season (March to August inclusive) or if that is unavoidable, only following an inspection by an ecologist confirming that there is no current nesting activity. In the event that nesting birds are discovered prior to or during the course of any work, work affecting the nesting site should stop immediately and should continue only once the bird nesting has finished i.e. young have fledged and left the nest. Particular care should be taken to avoid lighting trees with features suitable for nesting birds.

9.4 Ecological Enhancement

- 9.4.1** The development proposals provide opportunities for the enhancement of the site's biodiversity value. The inclusion of the following recommendations would be of ecological benefit and be in line with the National Planning Policy Framework (NPPF):

- Log piles could be positioned to provide shelter for reptiles and small mammals. Several of the logs could be dug into the ground and positioned vertically to provide suitable sheltering and foraging habitat for stag beetle larvae and other dead wood specialist species;
- Garden habitats should include features to allow the movement of wildlife such as hedgehogs, between gardens by either raising close board fencing above the ground or by cutting holes (measuring 13cm square) in the boards;
- The new houses could include features suitable for wildlife associated with dwellings such as nesting birds and roosting bats by including purpose built boxes within the walls for example. Bird nesting boxes should be sited as high as possible on buildings and so that the entrances face away from direct sunlight and prevailing winds; bat boxes should be sited as high as possible on varying sides of buildings so that some receive direct sunlight; and

10 REFERENCES

Bat Conservation Trust and Institute of Lighting Engineers (ILE) (2018). *Bats and Artificial Lighting in the UK*. Bats and the Built Environment Series. Guidance Note 08/18.

Collins, J. (ed.) (2016). *Bat Surveys for Professional Ecologists – Good Practice Guidelines*. 3rd Edition. Bat Conservation Trust, London.

English Nature (2006). *Dormouse Conservation Handbook*. English Nature, Peterborough.

Fure, A. (2006). *Bats and lighting*. The London Naturalist. No. 85.

Joint Nature Conservation Committee (JNCC) (2010). *Handbook for Phase 1 habitat survey – A technique for environmental audit*. JNCC, Peterborough.

Langton, T., Beckett, C. & Foster, J. (2001). *Great Crested Newt Conservation Handbook*. Froglife, Halesworth.

Mitchell-Jones, A. J. (2004). *Bat mitigation guidelines*. English Nature, Peterborough.

Mitchell-Jones, A. J. & McLeish, A. P. (2004). *Bat Workers' Manual (3rd Edition)*. JNCC, Peterborough.

Stone, E.L., Harris, S., Jones, G. (2015a). *Impacts of artificial lighting on bats: A review of challenges and solutions*. *Mammal. Biol.* 80, 213-219.

Stone, E.L., Wakefield, A., Harris, S., Jones, G. (2015b). *The impacts of new street light technologies: experimentally testing the effects on bats of changing from low-pressure sodium to white metal halide*. *Philos. T. R. Soc. B.* 370, 20140127.

APPENDIX 1 – SITE PHOTOGRAPHS



1. Southern end of the site overgrown with dense bramble (DS1)



2. Footpath cleared through parts of the dense scrub (OH1)



3. Small patch of grassland in opening in dense scrub (TN1)



4. Brick wall covered in the bramble (TN2)



5. Dilapidated shed covered in bramble (TN3)



6. Dense scrub along the western boundary of the site (DS2)

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

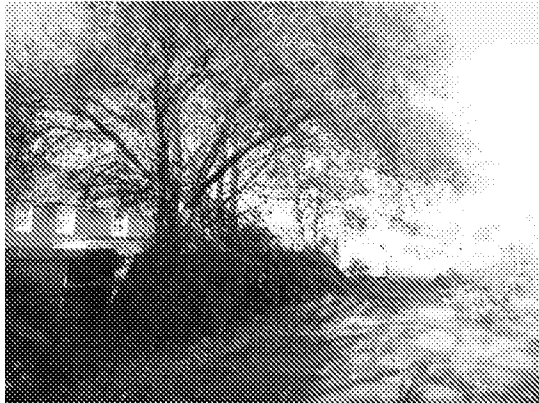
- 29 -



7. Dense scrub encroaching onto car park towards the north western end of the site (DS3)



8. Patches of ephemeral/short perennial vegetation and tall ruderal vegetation becoming established across the former car park (ESP1)



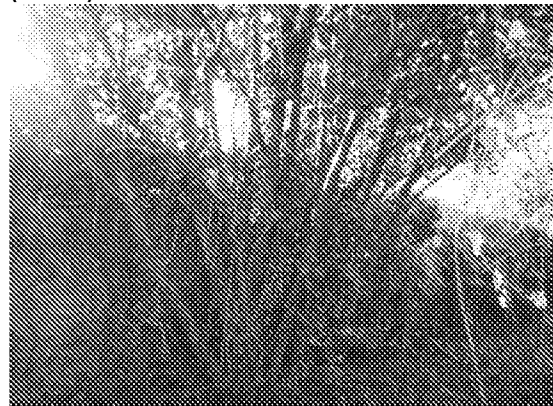
9. Scattered trees along the western boundary of the car park (SBW1)



10. Scattered trees along the southern boundary and western boundary of the car park (SBW1)



11. Bird nesting material visible in a tree along the western boundary (SBW1)



12. Coppiced hazel along the southern boundary (SBW2)



13. Strip of cypress trees separating the former pub garden to the south of the site and the car park to the north (SCW1)



14. A few conifers to the south western corner of the site (SCW2)



15. Patch of introduced shrubs amongst the hard standing and short ephemeral vegetation to the north of the site (IS1)

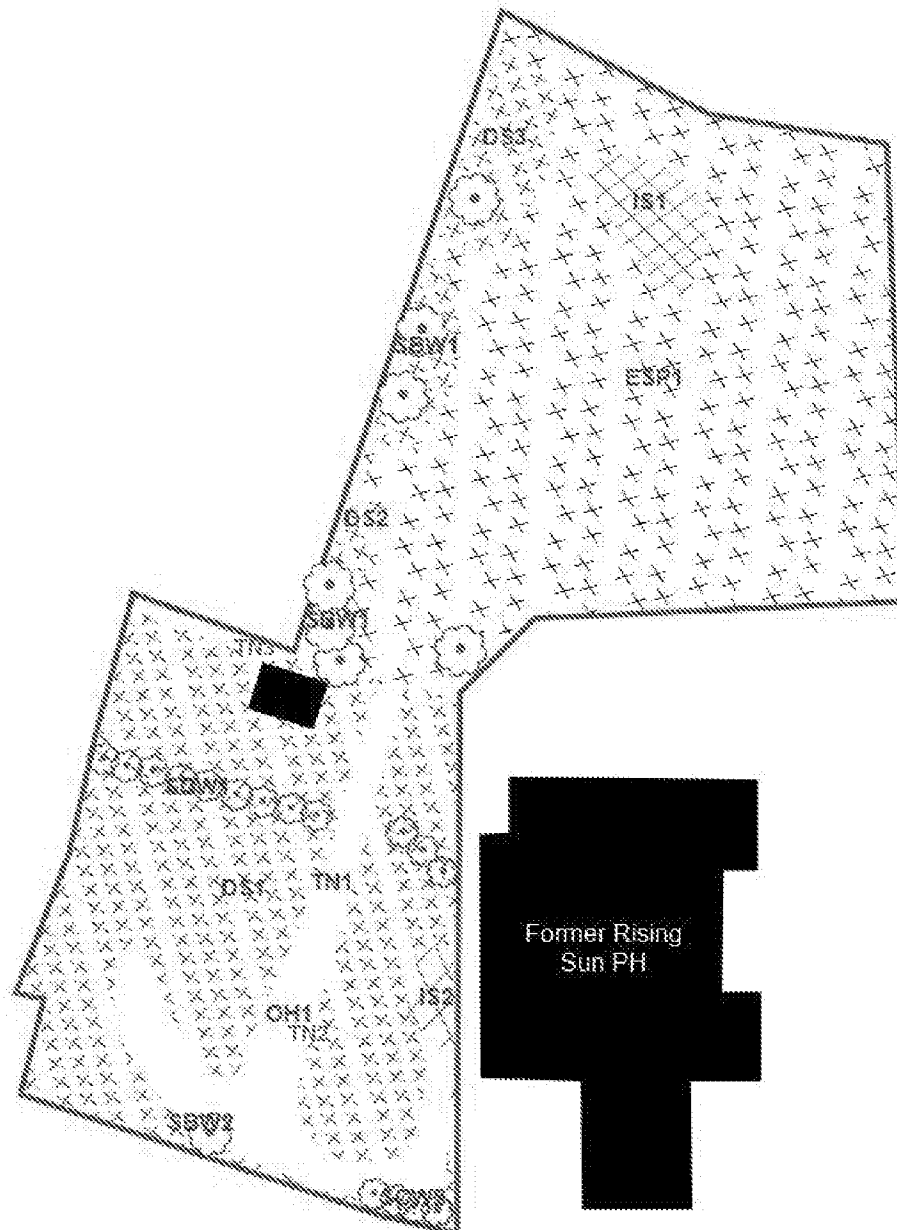


16. Some rubble and soil piled towards the north of the site (IS2)



17. A few remaining introduced shrubs from the former pub garden growing amongst the dense scrub to the south west of the site (IS2)

APPENDIX 2 – PHASE 1 HABITAT SURVEY PLAN




Buildings


Site boundary


Target Note


Scat


Nov 2020


Ephemeral/short perennial vegetation


Scrub


Introduced shrub

Drawn by:	Date	Scale:	Land at the Former Rising Sun Public House North Bersted, West Sussex	
VP	May 2019	Not to scale	Updated Phase 1 Habitat Survey	

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

PHASE 1 HABITAT SURVEY NOTES

Habitat code/target note	Habitat Description
DS1	Dense scrub – southern half of the site was overgrown with dense bramble (<i>Rubus fruticosus</i> agg.), which was mostly impenetrable (Photograph 1). butterfly-bush (<i>Buddleia davidii</i>) and hazel (<i>Corylus avellana</i>) were growing amongst the bramble occasionally and pendulous sedge (<i>Carex pendula</i>) was rarely present
OH1	Other habitat - footpath had been recently cleared to allow access onto the site which comprised of background (Photograph 2).
DS2	Dense scrub – western boundary of the former car park with dense scrub growing beneath the trees (Photograph 6) and species present included bramble (<i>Rubus fruticosus</i> agg.), common chickweed (<i>Stellaria media</i>), cleavers (<i>Galium aparine</i>) and herb robert (<i>Geranium robertianum</i>).
DS3	Dense scrub – scrub extending into the hard standing in the north western corner of the site (Photograph 7) and other plant species included soft brome (<i>Bromus mollis</i>), common nettle (<i>Urtica dioica</i>), butterfly-bush (<i>Buddleia davidii</i>) and dove's-foot crane's-bill (<i>Geranium molle</i>).
ESP1	Ephemeral/short perennial vegetation - former car park with patches of ephemeral/short perennial vegetation and tall ruderal vegetation had established (Photograph 8) with species such as ribwort plantain (<i>Plantago lanceolata</i>), Yorkshire fog (<i>Holcus lanatus</i>), dove's-foot crane's-bill (<i>Geranium molle</i>), greater plantain (<i>Plantago major</i>), soft brome (<i>Bromus mollis</i>), dandelion (<i>Taraxacum officinale</i> agg.), yarrow (<i>Achillea millefolium</i>), smooth sow-thistle (<i>Sonchus oleraceus</i>), herb robert (<i>Geranium robertianum</i>), Canadian fleabane (<i>Conyza canadensis</i>), common chickweed (<i>Stellaria media</i>), nettle (<i>Urtica dioica</i>), ground ivy (<i>Glechoma hederacea</i>), red deadnettle (<i>Lamium purpureum</i>), groundsel (<i>Senecio vulgaris</i>), cock's foot (<i>Dactylis glomerata</i>) and a willowherb. Moss was also growing over the western side of the car park.
SBW1	Broadleaved parkland/scattered trees – There were scattered trees amongst the scrub on the western site boundary and along the southern side of the car park. Species included sycamore (<i>Acer pseudoplatanus</i>), elder (<i>Sambucus nigra</i>), silver birch (<i>Betula pendula</i>), cherry (<i>Prunus</i> sp.) and ash (<i>Fraxinus excelsior</i>) (Photographs 9 & 10). Old bird nesting material was visible amongst the trees (Photograph 11).
SBW2	Broadleaved parkland/scattered trees – coppiced hazel (<i>Corylus avellana</i>) with light ivy (<i>Hedera helix</i>) cover along the southern boundary of the former garden amongst the dense scrub (Photograph 12).
SCW1	Coniferous scattered trees – strip of cypress trees was present across the centre of the site separating the former pub garden and car park (Photograph 13).
SCW2	Coniferous scattered trees - few conifers were present towards the south eastern corner of the site amongst the dense scrub (Photograph 14).
IS1	Introduced shrub – patch of introduced shrubs established in the centre of the hard standing comprising butterfly-bush (<i>Buddleia davidii</i>), pampas grass (<i>Cortadina selloana</i>), bramble (<i>Rubus fruticosus</i> agg.), mallow (<i>Malva</i> sp.), foxglove (<i>Digitalis purpurea</i>), dock (<i>Rumex</i> sp.), sow thistle (<i>Sonchus</i> sp.), herb Robert (<i>Geranium robertianum</i>), Yorkshire fog (<i>Holcus lanatus</i>) and a spurge (<i>Euphorbia</i> sp.) (Photograph 15). There was a pile of soil and rubble amongst the vegetation which was solid with limited crevices (Photograph 16).
IS2	Introduced shrub - few introduced shrubs were growing around the south eastern corner of the former garden and included species such as spotted laurel (<i>Aucuba japonica</i>), cypress and box (<i>Buxus sempervirens</i>) (Photograph 17).
Target Note 1	A small patch of grassland was growing in the cleared area and included: cock's-foot (<i>Dactylis glomerata</i>), creeping bent (<i>Agrostis stolonifera</i>), fescue (<i>Festuca</i> sp.) and dove's-foot crane's-bill (<i>Geranium molle</i>) (Photograph 3).

John Wenman Ecological Consultancy

Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)

- 33 -

Target Note 2	An old section of brick wall was present beneath the bramble which was covered with ivy (Photograph 4).
Target Note 3	An old, dilapidated shed was present underneath the bramble towards the north western end of the scrub (Photograph 5).

APPENDIX 3 - PLANT SPECIES RECORDED DURING THE SURVEY

Plant common name	Scientific name
Box	<i>Buxus sempervirens</i>
Bramble	<i>Rubus fruticosus</i> agg.
Butterfly-bush	<i>Buddleia davidii</i>
Canadian fleabane	<i>Conyza canadensis</i>
Cherry	<i>Prunus</i> sp.
Cleavers	<i>Galium aparine</i>
Cock's-foot	<i>Dactylis glomerata</i>
Common chickweed	<i>Stellaria media</i>
Common nettle	<i>Urtica dioica</i>
Creeping bent	<i>Agrostis stolonifera</i>
Cypress	
Dandelion	<i>Taraxacum officinale</i> agg.
Dock	<i>Rumex</i> sp.
Dove's-foot crane's-bill	<i>Geranium molle</i> .
Elder	<i>Sambucus nigra</i>
Fescue	<i>Festuca</i> sp.
Foxglove	<i>Digitalis purpurea</i>
Greater plantain	<i>Plantago major</i>
Ground ivy	<i>Glechoma hederacea</i>
Groundsel	<i>Senecio vulgaris</i>
Hazel	<i>Corylus avellana</i>
Herb robert	<i>Geranium robertianum</i> .
Ivy	<i>Hedera helix</i>
Mallow	<i>Malva</i> sp.
Pampas grass	<i>Cortadina selloana</i>
Pendulous sedge	<i>Carex pendula</i>
Red deadnettle	<i>Lamium purpureum</i>
Ribwort plantain	<i>Plantago lanceolata</i>
Silver birch	<i>Betula pendula</i>
Smooth sow-thistle	<i>Sonchus oleraceus</i>
Soft brome	<i>Bromus mollis</i>
Sow thistle	<i>Sonchus</i> sp.
Spotted laurel	<i>Aucuba japonica</i>
Spurge	<i>Euphorbia</i> sp
Sycamore	<i>Acer pseudoplatanus</i>
Willowherb	
Yarrow	<i>Achillea millefolium</i>
Yorkshire fog	<i>Holcus lanatus</i>

2.



Land at Rising Sun PH, North Bersted - Updated Preliminary Ecological Appraisal (R2679b)