

From: Beale, Susan [REDACTED]
Sent: 04 February 2021 17:45
To: Amy Myer <Amy.Myer@arun.gov.uk>
Cc: Claire Potts <Claire.Potts@arun.gov.uk>
Subject: RE: BE/148/20/OUT - Nursery Fields - lack of winter bird survey - URGENT QUERY

Hi Amy,

A winter bird survey would normally require four surveys, ideally during the months of November, December, January and February.

The bird survey would need to take place when the land was suitable for use by geese, as stated, if the applicant refuses to do this, additional information will have to be provided to show the management of the land over a period of time eg what the cropping regime has been over recent years, frequency of planting of crops favoured by geese during that timeframe, etc.

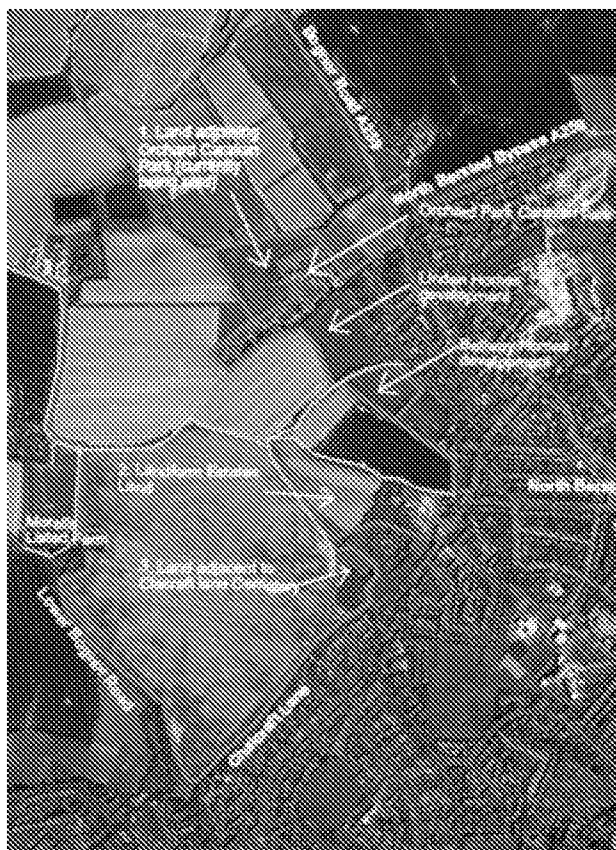
Hope that helps,

Sue

From: Beale, Susan [REDACTED]
Sent: 03 February 2021 14:30
To: Amy Myer <Amy.Myer@arun.gov.uk>
Cc: Claire Potts <Claire.Potts@arun.gov.uk>
Subject: RE: BE/148/20/OUT - Nursery Fields - lack of winter bird survey - URGENT QUERY

Dear Amy,

The Nursery Fields site forms part of the SD3 West of Bersted strategic allocation in the Arun LP, which we have been advising on since 2016. As it's within the 5km foraging distance for brent geese, we advised the consultants working on the strategic masterplan should consider loss of foraging habitat. We heard from the consultants last year, and they said that they'd done 3 years of surveys and found no geese. Below is a map showing the strategic allocation and indicating the areas of third party land, the Nursery Fields area in question is 2. Landform Estates.



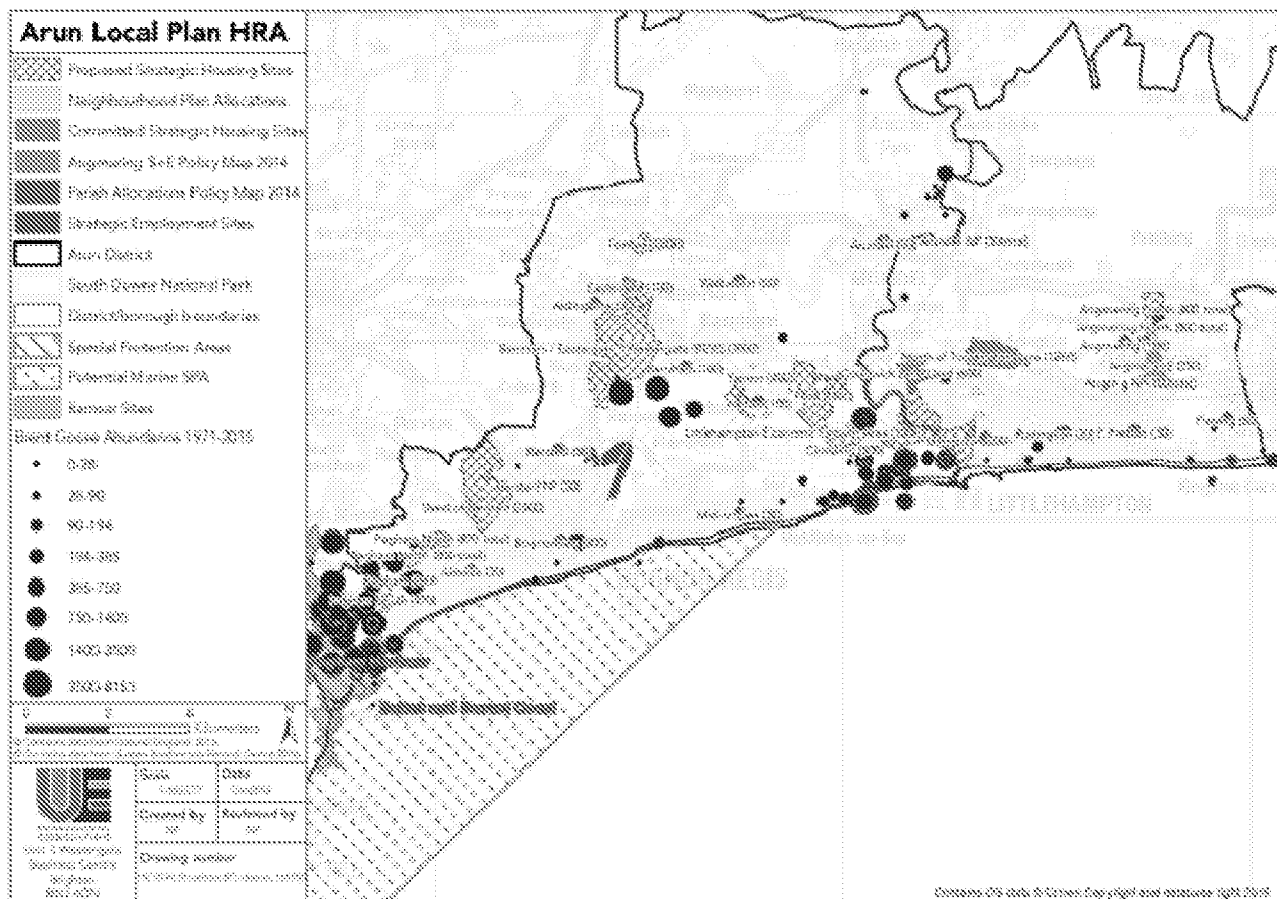
I assume that the consultants for SD3 did not survey the 3rd party land, but they may be able to advise whether they saw geese on the adjacent habitat, or whether in their view it is unsuitable. If the consultants cannot shed any light, I would suggest Arun need to adhere to the policy and require a winter's survey. The survey should be completed with the land in suitable management for geese, otherwise surveying when the ground is bare (or other unsuitable cultivation) would not be sufficient. If the applicant refuses, as they have done previously, they need to provide more information on the land, particularly the cropping regime, and why it is not suitable for brent geese – this is the other part of Arun's policy on functionally linked land: *'prove the site is not used regularly by birds. To do this information on the cropping regime, frequency of planting favoured by Brent Geese, sources of disturbance, openness of the site, historic data search and at least one seasons wintering surveys will need to be provided.'*

Thus far, Ecology Solutions have just said that nearby fields are larger and therefore more suitable, and that the application site is enclosed by tall hedges. The application site is divided into two fields, but the hedge down the middle does not look very dense so although there does seem to be a treed hedge round the edge of the application site, it is still plenty big enough to make it suitable for geese.

I note that Ecology Solutions also argue that there is a footpath through the middle, so disturbance would make it unsuitable. But, as has been found with the Pagham sites, geese will still happily use a field with a footpath through it, and adjacent to housing, so that's not enough of an argument.

So, unless the consultants for West of Bersted can advise Arun on brent goose usage, or Ecology Solutions can provide some detailed habitat information as to why the application site is not suitable, then winter survey data should be provided. This is required by Arun policy, which implements the HRA of the Local Plan.

Additionally, this was the map from the Arun LP HRA, which contrary to what Ecology Solutions say in their shadow HRA, shows brent goose records within 3km.

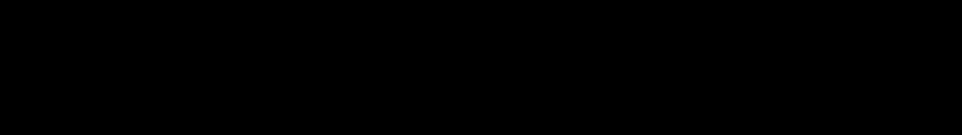


Regards,

Sue Beale.

Manager - Kent & Sussex

PLEASE NOTE I finish at 3 on Monday and Tuesday.



- During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.
- Stay at home, protect the NHS, save lives.

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