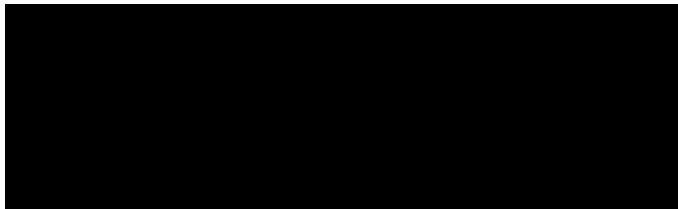


Ecology response



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**From:** Jonathan Best <Jonathan.Best@arun.gov.uk>  
**Sent:** 30 April 2025 16:11  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Emma Sheppard <Emma.Sheppard@arun.gov.uk>  
**Subject:** BE/16/25/RES

Land at Oldlands Farm Newlands Road Bognor Regis PO22 9NN.

I have reviewed this application with regards to ecology.

Recommendation: Refuse due to failure to meet the recommendations of the Ecological Impact Assessment (The Ecology Co-op, November 2022) for bats, birds and reptiles.

The outline application decision notice sets a number of conditions relating to ecology and requires delivery of mitigation and ecological enhancements as set out in the Ecological Impact

Assessment (The Ecology Co-op, November 2022). These actions are a material consideration in the approval of the reserved matters.

Conditions: 13 lighting, 16 Ecological Mitigation, 17, Construction Environmental Management Plan, 18 Biodiversity Enhancement Strategy and 19 Landscape Ecological Management Plan are relevant to this application.

The specific enhancements that must be included within the LEMP are as follows:

- Sowing of SuDS features with species-rich wetland wildflower mixtures such as Mixture EM8 by Emorsgate seeds. This mixture must include no less than 20 native grass and wildflower species sown in the early spring or early autumn. Once established it must not be cut more than twice per year and its management must follow the prescriptions set out within the LEMP.

No SUDs features are identified within the submitted site plans for this application.

- Neutral wildflower meadow grassland will be established in new greenspace areas. The most appropriate seed mixture for this area would be EM3 by Emorsgate seeds, containing 29 native grass and wildflower species.

Details of this are provided and is acceptable.

- New native hedgerow planting will be used to create new boundaries around the site. These hedgerows will be planted at a density of five hedge trees per linear metre and will comprise of 50% hawthorn *Crateagus monogyna*, with not less than five additional native tree species forming the remainder of the planting mix, including species such as blackthorn *Prunus spinosa*, dogwood *Cornus sanguinea*, field maple *Acer campestre*, hazel *Corylus avellana*, purging buckthorn *Rhamnus cathartica*, wild privet *Ligustrum vulgare* and guelder rose *Viburnum opulus*.

The formal hedge is a double row native mix that meets the recommended species composition. Details of this are provided and is acceptable.

- The provision of no less than 8 new features for roosting bats, including three cavity wall boxes such as the Habibat Bat Box or Vivara Pro build-in WoodStone bat box, three crevice roosting features for buildings, such as the Schwegler 2FE wall mounted shelter or Beaumaris woodstone bat box and two tree mounted bat boxes, such as the general purpose bat box.

No wall mounted cavity bat boxes and only 3 tree bat boxes are shown on the plans. This falls short of the requirements.

- The provision of 10 new features for nesting birds, including 2 swift boxes, 2 house martin cups, 2 house sparrow terraces and 4 general purpose bird boxes.

Only 4 General purpose nest boxes are shown in the Biodiversity Enhancement Strategy February 2025. This falls short of the requirements.

Approval of the lighting is sought by condition 13 of BE/150/22/OUT.

Although this is addressed through discharge of condition there are concerns regarding the lighting as it fails to meet best practice for bat friendly lighting.

All the habitat areas are illuminated to a level of at least 5 lux. Reduction of the number of lights should be considered to meet best practice.

Regarding tree planting, the majority of the trees are native species and extra heavy standards. There are no trees on grassland area on western boundary because of the Gas Main. This is acceptable.

Reptiles will be displaced to a greenspace buffer area fenced off from the rest of the site prior to construction works commencing, with this work detailed and carried out according to a detailed Method Statement. The establishment of this receptor area prior to the commencement of construction will be essential to ensure that the habitat supporting them has matured.

No method statement or information on the protection of reptiles or the establishment of a receptor site as mitigation has been provided with the submitted plans for this application.

#### Other concerns

Because of the hedges shown on the plans, access for maintenance of the grass areas require review as it looks as if it would be very difficult to maintain grass areas on the southern end of the site without breaking through a hedge.

Details of the acoustic fencing specification on the east side are required so we can assess if there is any impact to the proposed planting and ground conditions there. It may be worth considering planting evergreen trees such as Yew to act as an alternative for the acoustic barrier.

Regards,

**Jonathan Best MCIEEM**  
**Ecology Officer, Planning Policy**

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