

Ecological Impact Assessment

47 Aldwick Road,
Bognor Regis

Version 3: 18th September 2024

South
Downs
Ecology

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Ecological Impact Assessment

47 Aldwick Road, Bognor Regis, PO21 2NJ

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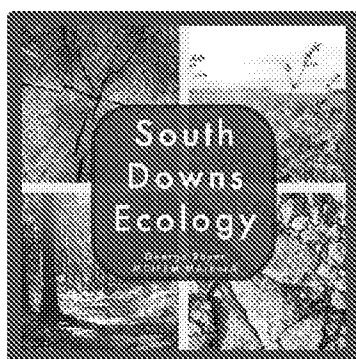
VERSION 3 – 18th September 2024

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Summary

Mr Thorn has commissioned a Preliminary Bat Roost Assessment, and Ecological impact assessment of the property at 47 Aldwick Road, Bognor Regis, PO21 2NJ (SZ 92790 98779, hereafter referred to as 'the site').

A Preliminary Ecological Appraisal and Bat Roost Assessment was carried out on the 31st of July by Aidan Bird (BSc Ecology and Conservation, Accredited agent under George Sayer's level 2 bat licence). The following ecological impact assessment report has been completed by Aidan Bird overseen and reviewed by George Sayer (BSc (Hons) Environmental Sciences, PgDip Endangered Species Recovery, MArborA, MCIEEM, NE Licence Holder – Bats Level 2 and GCN - Ecologist).

The proposals are for internal remodelling and alterations predominantly to the rear of the property allowing for a new ground floor dwelling separate from the commercial unit. The rear section of the property will see the ridge extended over the current flat roof to produce a uniform single-story section with a gabled end above new south facing patio doors. There is also due to be adjustment of Velux windows in relation to both size and location therefore disturbing the current ground floor roof area. No changes to the main roof have been indicated.

The proposals are not anticipated to have any significant impact upon ecology; the building is unlikely to support bats and proposals stand a 'negligible' chance of disturbing bats or their roosts or foraging and commuting habitats providing some basic lighting control measures are undertaken. No further surveys are currently recommended at the site for these proposals.

No significant effects are anticipated upon the Pagham Harbour, South Downs Bat SACs, Bognor Reef SSSI or any other designated site, provided basic avoidance measures are built into the proposals.

When mitigation and enhancements have been taken into account, the proposals are not considered to have a negative impact upon habitats or protected species in accordance with planning policy and once enhancements are considered, would result in a minor net gain. The proposals would therefore accord with the relevant local and national planning policies and the relevant legislation.

1.0 Introduction

- 1.1 Mr Thorn has commissioned a Preliminary Bat Roost Assessment, and Ecological impact assessment of the property at 47 Aldwick Road, Bognor Regis, PO21 2NJ (SZ 92790 98779, hereafter referred to as 'the site').
- 1.2 A Preliminary Ecological Appraisal and Bat Roost Assessment was carried out on the 31st of July by Aidan Bird (BSc Ecology and Conservation, Accredited agent under George Sayer's level 2 bat licence). The following ecological impact assessment report has been completed by Aidan Bird overseen and reviewed by George Sayer (BSc (Hons) Environmental Sciences, PgDip Endangered Species Recovery, MArborA, MCIEEM, NE Licence Holder – Bats Level 2 and GCN - Ecologist).
- 1.3 The purpose of the assessment has been to identify whether any potential impacts upon protected species, habitats or designated sites might occur, and to propose mitigation or avoidance measures where necessary.
- 1.4 Based on the results of the appraisal, recommendations for potential ecological enhancements have been provided.

Site Description and Surrounding Area

- 1.5 The application site comprises a three-storey end of terrace property located on the south side of Aldwick Road in Bognor Regis. The existing ground floor accommodation comprises a Use Class E town centre commercial unit, at the front, along with a vacant, former printers' workshop, to the rear. Each of the two upper floors are occupied by a single residential flat. The site is bounded to the south, east and west by further commercial and domestic properties, and to the north by Aldwick Road.
- 1.6 The site is located within the built-up area of Bognor Regis, with the beach less than c.150 m south. The nearest greenspaces are small recreational areas or heavily maintained grass areas; c.550m west presents the nearest large greenspace of west park with mature trees encompassing a modified grassland.

Proposals

- 1.7 The proposals are for internal remodelling and alterations predominantly to the rear of the property allowing for a new ground floor dwelling separate from the commercial unit. The rear section of the property will see the ridge extended over the current flat roof to produce a uniform single-story section with a gabled end above new south facing patio doors. There is also due to be adjustment of Velux windows in relation to both size and location therefore disturbing the current ground floor roof area. No changes to the main roof have been indicated.

2.0 Scope of Assessment

1. *Categorise habitats present on the site;*
2. *Identify habitat which may have potential for protected species;*
3. *Identify whether any signs of protected species are present on-site;*
4. *Recommend whether further surveys are required, or whether there are any relevant constraints with regards to protected species;*
5. *Identify impacts of the proposed development and set out appropriate avoidance, mitigation and compensation measures;*
6. *Provide recommendations as to how the site and proposals could be enhanced with regards to protected species and habitats.*

- 2.1 This appraisal and assessment is deemed to be relevant for a maximum of 18 months due to the possibility of changes in the habitats on-site. Should the site or proposals alter, the ecologist should be consulted to confirm that the appraisal is still valid.

3.0 Planning Policy and Legislation

National Planning Policy

- 3.1 The National Planning Policy Framework (NPPF) 2023 sets out the government planning policies for England and how they should be applied. 'Chapter 15: Conserving and Enhancing the Natural Environment' states that development should be 'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'
- 3.2 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

Local Planning Policy

- 3.3 The site is set in the Bognor Regis area within the Arun District; the current local Plan 2011-2031 was adopted in 2018 and comprises a written statement and supporting Policies Maps 1-4 (Arun District Council, 2018). Alongside this plan future development decisions will also consider the Bognor Regis 2015—2030 Neighbourhood Development Plan (August 2015) and National Planning Policy Framework (Department for Levelling Up, Housing and Communities, 2023). Issues of nitrate pollution, water quality and abstraction have generated environmental problems within neighbouring authorities, especially in relation to sensitive internationally designated sites. These have seen restrictions placed upon planning applications until nitrate and water neutrality can be demonstrated. Although "not currently an issue in Arun", the district is aided with guidance from statements of Southern water, Natural England and the Environment agency (Arun District Council, 2023b).
- 3.4 The local plan sets out Arun's future vision and guides developments; their objective for the natural environment is "to plan for climate change and work in harmony with the environment to conserve natural resources and increase biodiversity".

3.4.1 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.

3.4.2 ENV DM1 Designated Sites of biodiversity or geological importance

Proposed development likely to have an adverse effect on land with the designated features of any Site of Biodiversity or Geological Importance as listed in Tables 17.1 - 17.7 or any subsequently designated sites (either individually or in combination with other developments), will not normally be permitted.

Consideration will be given to the exact designated features present on the site, their scarcity/rarity and recognition of the protection offered by their existing status. Development on wildlife sites with the highest value will only be permitted exceptionally where the following can be demonstrated:

- i. There is no alternative solution (which shall be adequately demonstrated by the developer).*
- ii. There are reasons of public health or public safety or Adoption Arun Local Plan 2011-2031 (July 2018) Arun District Council 209 17 Natural Environment*
- iii. There are benefits of primary importance to the environment or*
- iv. There are imperative reasons of overriding public interest.*

Notwithstanding the above however, the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.

In determining any planning application affecting Sites of Biodiversity or Geological Importance the Council will ensure that the intrinsic natural features of particular interest are safeguarded or enhanced having regard to;

- i. The European, National or Local status and designation of the site;*
- ii. The nature and quality of the site's features, including its rarity value;*
- iii. The extent of any adverse impacts on the notified features of interest;*
- iv. The need for compensatory measures in order to re-create remaining features of habitats on or off the site.*

Where appropriate the Council will ensure the effective management of designated sites through the imposition of planning conditions or Section 106 agreements as appropriate.

3.4.3 ENV DM2 Pagham Harbour

Within Zone A (0-400m 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).

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. 212 Arun District Council Adoption Arun Local Plan 2011-2031 (July 2018) 17 Natural Environment*

Major developments (as defined in the GDPO 1995 as amended(61)) 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.

3.4.4 ENV DM3 Biodiversity Opportunity Areas

Development shall:

- a. Retain and sympathetically incorporate locally valued and important habitats, including wildlife corridors and stepping stones*
- b. Be designed in order to minimise disturbance to habitats*

Development proposals that do not reasonably address opportunities for enhancing these through their design, layout and landscaping or access/management shall not be permitted. Where a development scheme would result result in a habitat loss, mitigation measures will be proposed as part of the proposed scheme and such measures agreed with the Local Planning Authority prior to the determination of any planning application. Within Biodiversity Opportunity Areas (BOAs) identified on the Policies Maps or where likely to have an impact on species or habitats within the BOAs, any application for planning permission shall include a properly conducted survey of the presence of that species and habitat and impact(s) that development may have on the BOA.

3.4.5 ENV DM4 Protection of trees

Development will be permitted where it can be demonstrated that trees protected by a Tree Preservation Order(s), (TPO) identified as Ancient Woodland, in a Conservation Area or contributing to local amenity, will not be damaged or destroyed now and as they reach maturity, unless development:

- a. Would result in the removal of one or more trees in the interests of good arboricultural practice. This shall be demonstrated by the developer following the advice of a suitably qualified person which shall be guided by BS 5837 (2012). Details of any advice received having regard to BS 5837 (2012) shall be submitted, in writing, as part of a planning application; or*
- b. Would enhance the survival and growth prospects of other protected trees;*
- c. The benefits of the proposed development in a particular location outweigh the loss of trees or woodland, especially ancient woodland. 216 Arun District Council Adoption Arun Local Plan 2011-2031 (July 2018) 17 Natural Environment*

Where planning permission is granted in any of the above instances, conditions shall be used to ensure that, for any trees which are removed as part of a development, at least an equivalent number of a similar species and age (where practical) are planted on the proposed development site. Sufficient space for replacement trees to mature without causing future nuisance or damage shall be provided. The planting of new trees shall form an integral part of the design of any development scheme.

Proper provision must be made for the protection and management of trees or areas of woodland on-site when undertaking development. A management plan shall be provided as part of a planning application in accordance with BS 5837 (2012) in order to ensure that trees are adequately protected during development and appropriately maintained in the future. Conditions for the continued protection of trees on sites shall be included in any planning permission given.

Where there are existing trees on or adjacent to a development site, developers shall be required to provide:

- d. Land and tree surveys*
- e. A tree constraints plan*
- f. An arboricultural impact assessment to include a tree protection plan and arboricultural method statement*

These will ensure that development is planned to take a comprehensive view of tree issues at an early stage in the design process and that development works do not have a negative impact on existing trees.

3.4.6 Policy ENV DM5 Development and biodiversity

Development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site. They shall also however incorporate elements of biodiversity including green walls, roofs, bat and bird boxes as well as landscape features minimising adverse impacts on existing habitats (whether designated or not). Development schemes shall also be appropriately designed to facilitate the emergence of new habitats through the creation of links between habitat areas and open spaces. Together, these provide a network of green spaces which serve to reconnect isolated sites and facilitate species movement.

Where there is evidence of a protected species on a proposed development site, planning applications shall include a detailed survey of the subject species, with details of measures to be incorporated into the development scheme to avoid loss of the species. This involves consideration of any impacts that will affect the species directly or indirectly, whether within the application site or in an area outside of the site, which may be indirectly affected by the proposals. All surveys shall be carried out at an appropriate time of year and shall be undertaken by a qualified and, where appropriate, suitably licensed person.

All developments shall have regard to Natural England's standing advice for protected species.

In general, the Council aim to assure long term survival of the most valuable and threatened species and habitats. All developments should therefore consider the preservation and enhancement of local biodiversity throughout the design process of development schemes. Proposals that are likely to have an adverse effect on Sites of Special Scientific Interest (SSSI) will not normally be permitted. Retention of trees and habitat is desired but in certain circumstances a new resource of at least equivalent value should be provided where there is loss of the original feature as a result of development. Any proposals should consider impacts on environmentally significant sites both within Arun and neighbouring planning authorities. Development plans should enhance the sites biodiversity by creating new, or improving existing, habitats.

A guide to Legislation

3.5 Bats

All species of bat and their roosts are protected under The Conservation of Habitats and Species Regulations 2017, and The Wildlife and Countryside Act 1981. It is an offence to intentionally kill, injure or handle a bat, to possess a bat (live or dead), disturb a roosting bat, or sell or offer a bat for sale without a licence. It is also an offence to damage, destroy or obstruct access to any place used by bats for shelter, whether they are present or not.

3.6 Birds

All UK bird species are protected against disturbance whilst occupying a nest (Wildlife and Countryside Act 1981). Furthermore, a number of birds are listed as Species of Principle Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. This obligates local authorities to have regard to the purpose of conserving biodiversity with particular emphasis on targeted species.

3.7 Herpetofauna – Amphibians and Reptiles

Reptiles are protected from intentional killing, injuring, and “taking” (Wildlife and Countryside Act 1981). The smooth snake, sand lizard, natterjack toad, pool frog, marine turtles, and great crested newt are species awarded higher protection against deliberate direct and indirect killing, disturbance, and obstruction.

3.8 Other Mammals

All mammals receive protection against cruelty, inhumane killing or injuring (Protection of Mammals Act 1996). Badgers are protected further whereby it constitutes an offence to kill, injure or interfere with a sett under ‘The Protection of Badgers Act 1992’. Otters became extinct in Sussex from the 1960s but are slowly increasing in numbers; it is an offence to kill, injure, take, or disturb them (Wildlife and Countryside Act 1981). Particular care should be taken if a river or tributary is within the 1km.

3.9 Plants and Fungi

The Wildlife and Countryside Act 1981 makes it an offence to intentionally pick, uproot or destroy those species listed within schedule 8 (Crown and database right, 2011).

Furthermore, many rare and threatened species are listed under section 41 of the ‘Natural Environment and Rural Communities Act 2006’ whereby regard for conservation must be incorporated into any planning decision.

Hedgerows of continuous length exceeding 20m and those under but connecting to another at each end, are protected by The Hedgerows Regulations 1997.

It is an offence to plant, cultivate, or cause growth to plants listed as Schedule 9 (Crown and database right, 2011) and the 36 invasive alien species (DEPRA & APHA, 2022).

3.10 Biodiversity Net Gain

In England, mandatory Biodiversity Net Gain (BNG) came into force from 12th February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). All developments must deliver a BNG of at least 10% unless otherwise exempt such as those affecting less than 25sqm of land (the ‘de minimis’ exemption) which this site accords with. As such BNG is not required for this site.

4.0 Methodology

Desktop Study

- 4.1 A desktop study was conducted using the government 'MAGIC' Map GIS tool; a search was carried out for all international statutory designated sites (Ramsar, SAC, SPA) within 12.0 km of the site; national statutory designated sites (SSSI, NNR, LNR) within 2.0 km of the site; and non-statutory designated sites (SNCI) and priority habitats within 2.0 km of the site. Any sites of relevance to the proposals are summarized below and their significance considered in the context of the development proposals. A search was also carried out to identify features of ecological interest in the area, such as water bodies and ancient woodland. Given the overall scale and nature of the site and the proposals, a full data search from SxBRC was not considered appropriate. This is in accordance with CIEEM current guidance for such projects

Site Visit

- 4.2 A site visit was conducted on 31st July 2024. During the surveys any constraints with regard to protected species were considered; the site was considered for its potential for protected species even when signs of these species were not noted at the time of the surveys. Other species have been considered where relevant.
- 4.3 The property was visited by Aidan Bird, an ecologist with over 5 years' relevant experience, an accredited agent under George Sayer's level 2 bat licence - 2018-34434-CLS. It was assessed for its potential to hold roosting bats; roof voids were assessed where relevant, and access points identified. Any evidence of bats such as grease marks, bat droppings, urine splashes were noted. The bat roost assessment was conducted following the Bat Conservation Trust - Bat Surveys for Professional Ecologists: Good Practice Guidelines (2023).
- 4.4 Due to the site visits being carried out within a short time period, it is possible that some signs of protected species may not be apparent within this short timeframe. This is a constraint recognised within the Bat Survey Guidelines and all reasonable effort has been made to identify evidence of protected species.

Ecological Impact Assessment

- 4.5 The methodology for Ecological Impact Assessment (EcIA) follows best practice guidelines set by the Chartered Institute of Ecology & Environmental Management (CIEEM): 'Guidelines for Ecological Impact Assessment' (CIEEM, 2018). This includes identifying the baseline conditions on the site and subsequently rating the potential effects of the development based on the sensitivity and value of the resource affected, combined with the magnitude, duration and scale of the impact (or change). This is initially assessed without mitigation measures, and then assessed again after allowing for the proposed mitigation measures; this provides the residual effects. The assessment is divided into construction effects and longer-term operational effects.
- 4.6 Each ecological feature within the site has been considered within a defined Geographic context such as:
- International and European;
 - National;
 - Regional;
 - County;
 - District;
 - Local;
 - Site Level;
 - Negligible.
- 4.7 Based upon CIEEM guidance, value was determined with reference to the following factors:
- Its inclusion as a Designated Site or other protected area;
 - The presence of habitat types of conservation significance, e.g. Habitats of Principal Importance (NERC 2006);
 - The presence (or potential presence) of species of conservation significance e.g. Species of Principal Importance (NERC 2006);
 - The presence of other protected species e.g. those protected under The Wildlife and Countryside Act 1981;
 - The sites social and economic value.
- 4.8 Specifically in the case of bats, the impact assessment has been conducted in accordance with the recently published Bat Mitigation Guidelines (Reason and Wray 2023).

5.0 Baseline Ecological Conditions and Protected Species Assessment

Desktop Study

Designated Sites and Habitats within 12.0km

- 5.1 The following information is included so that the site can be considered within the ecological context of the surrounding area, guiding decisions related to habitat change and protected species; these sites are not necessarily representative of the habitat on or surrounding the site and may not be influenced by the proposals.
- 5.2 The closest statutory designated site is Bognor Reef SSSI, c.125 m south of the site on the shingle beach. This site is designated both for geological reasons, and for the extensive area of vegetated shingle. The site is within the Impact Risk Zone (IRZ) of the Pagham Harbour SPA, SSSI, Ramsar, situated 3.46 km south-west at their closest. Planning applications of this nature do not require consultation with Natural England. Any proposals which increase the number of units within this location would have to contribute to the Pagham Harbour Access Management Plan. As the number of units is increasing by one, the appropriate contribution will be necessary.
- 5.3 Furthermore, other notable sites are Brooks LNR 2.5km North which holds extensive wetland and grassland along with Felpham SSSI 2.8km to the east designated for its geological importance.
- 5.4 The site is 16.1km south southeast of the Singleton and Cocking SAC and therefore well outside of its 12.0 km Wider Conservation Area, whereby significant impacts upon bats and severance of flightlines must be considered (SDNPA and NE 2018). Whilst other statutory sites are present within the surroundings, none would be impacted by such a proposal.

Habitats

Desk Study

- 5.5 UK Priority Habitats within 2.0 km of the site include coastal vegetated shingle, coastal and floodplain grazing marsh.. None of these habitats are on or within close proximity to the site. The beach to the south is well used, unvegetated shingle at this location.

Site Assessment

- 5.6 The site is a mixed use site comprising a town centre commercial unit, at the front, along with a vacant, former printers' workshop, to the rear, comprising buildings and surrounding hard standing, habitats of **negligible value** in themselves, whose potential for protected species are discussed further below.

Bats

Desk Study

- 5.7 There is a single EPSM licence (1.9km east) within a 2km radius of the site for Common pipistrelle bats *Pipistrellus pipistrellus*, and soprano pipistrelle bats *Pipistrellus pygmaeus*. Many other bats have been recorded in the wider area however with the heavily urbanised area the site is located in it, light sensitive bats will not be present.

Site Assessment

- 5.8 The building consists of a large building with a commercial unit, rear store and courtyard, and two flats on the upper two storeys of the main building. The main roof is comprised of composite slate effect tiles with blue clay hips and ridges. The ridges and tiles appear to be spot mortared and therefore posses some gaps large enough for bats to enter. The front of the building is a rendered face with intersecting treated timber and large leaded windows. Multiple sections of the property have restrictive netting over small inaccessible balcony areas. The eaves and soffits demonstrate some potential roosting features noting especially the fascia gap on the southeast.
- 5.9 The rear section of the building, main subject of the current proposals, is a similar composite material slate effect tile with concrete hips and eaves. The roof shows significant moss and lichen build up with relatively well sealed hips and ridges. The most significant areas of the building for potential to contain bat roosts is the slanted felt flat roof where there is major timber decay with a bargeboard hanging off and areas of lifted felt and missing mortar. The current Velux windows are relatively well sealed with no notable gaps.
- 5.10 All potential roosting features were investigated with artificial light and endoscope where possible. No evidence of bats was found during the inspection.
- 5.11 Given the lack of evidence but present of potential access points and roost features the building would be considered as low potential however with consideration for the setting of the property it is considered to offer **negligible** bat roost potential.
- 5.12 The immediate surroundings are that of further large domestic and commercial buildings with no greenspaces in the immediately vicinity. Notably to the rear of the site, the neighbouring property is faced with hanging tiles which are often preferred by crevice roosting species. Gardens around the area are small and isolated with mainly ornamental plants. The site itself contains limited to no vegetation and is considered of **negligible-site potential** for foraging and commuting bats.

Birds

Desk Study

- 5.13 Numerous bird species are present in the wider area, however with the developed local area these are likely restricted to urban tolerant species.

Site Assessment

- 5.14 Feral/City pigeons *Columba livia domestica* were observed displaying breeding behaviour on nearby properties. Additionally, nesting material was also present in places indicating that a species of bird was using the roof as a nesting place. Areas of the lower roof were protected with a netting however its poor tethering has allowed various species to enter these spaces. This may later cause injury to birds due to entrapment therefore is highly recommended this should be inspected and rectified.
- 5.15 The rear courtyard offers little to no value for foraging or nesting. The overflowing drain at the time of assessment encouraged moderate numbers of flies and other insects which may provide a minor food source. Overall, the site is of **low site value** to birds.

Other

- 5.16 No potential for or evidence of any other protected species such as badger, water vole, dormouse, reptile, hedgehogs, rare plants or notable invertebrates was recorded. No impacts upon other protected species are considered likely and have not been assessed further.

6.0 Evaluation of Impacts and Mitigation

Designated Sites

Potential Impacts

- 6.1 The site is within the Impact Risk Zone of the Pagham Harbour SPA, SSSI, Ramsar: In this zone any proposals increasing overnight accommodation must contribute to access management of the Chichester Harbour to protect the qualifying bird species. As the number of units is increasing by one, a significant effect would occur.
- 6.2 The Bognor Reef SSSI is situated relatively close-by however the proposals are limited in scope and would be highly unlikely to cause any degradation, with the designated site being largely geological and limited to the coastal area.
- 6.3 The impacts of construction traffic and noise, dust and pollution upon the designated sites or other designated sites would be negligible.
- 6.4 No impact upon Singleton and Cocking Tunnels SAC is anticipated, with no impacts upon bats anticipated.

Mitigation and Compensation

- 6.5 The applicant will contribute the appropriate amount to the Pagham Harbour Access Management Plan to mitigate the increased recreational disturbance caused by one additional residential unit.

Residual Impacts

- 6.6 The impacts will be negligible.

Habitats

Potential Impacts

- 6.7 The proposals would impact only the existing building and surrounding hard surfaces. In the absence of mitigation, the proposals would include dust, noise and light pollution of adjacent properties and garden habitats with potential to extend further towards the shingle beach. Impacts are of **minor magnitude at site level**.

Mitigation and Compensation

- 6.8 All construction will be undertaken in accordance with best practice advice with regards to control of dust, noise and emissions. No chemicals or fuels shall be stored on open ground or where they might leach into the beach habitats.

Residual Impacts

- 6.9 Once mitigation is taken into account, the impacts will be negligible.

Bats

Potential Impacts

- 6.10 The building was classified as offering 'negligible' bat roost potential upon consideration of the proposals and surrounding location. It is considered highly unlikely that works would disturb a bat roost.
- 6.11 Significant impacts upon foraging or commuting bats are considered unlikely, given the lack of suitable habitat on-site or nearby.
- 6.12 There remains a minor risk that commuting bats may be temporarily affected by construction through noise and lighting. This would be a minor impact at the site-local level.

Mitigation and Compensation

- 6.13 Works shall be designed to minimise disturbance of any bats which might use the surroundings. Any new external lighting shall be angled downwards and shall avoid any light spill and shall accord with the principles of BCT/ILP Guidance Note 08/23. Warm white lighting below 2700K should be used and such lighting must be fitted with controls or timers and not left on overnight. No construction phase external lighting will be used.

Residual Impacts

- 6.14 The overall impact of the scheme will be negligible.

Nesting Birds

Potential Impacts

- 6.15 It is considered unlikely but possible that any nesting birds would be disturbed through the proposals, given the evidence on the roof. No impacts upon wading or coastal birds are anticipated.

Mitigation and Compensation

- 6.16 The roof should be subject to a check for nesting birds by the contractor immediately prior to roof works. Such works must be aware of the possibility of birds being present. Should any nests be found, works shall cease until an ecologist can confirm that these are out of use.

Residual Impacts

- 6.17 The overall impact of the scheme will be negligible.

7.0 Ecological Enhancements

7.1 Because of the scale and nature of the proposals, ecological enhancement opportunities within the construction zone are limited. The most beneficial enhancements would involve the following:

- Introducing small shrubs and other native plants to the courtyard area. A climbing plant along the rear wall would also provide nesting for smaller birds and improved aesthetics;
- Installation of new bat roost features to the building, such as an integrated crevice bat box. This could be installed on the proposed southern elevation immediately below or integrated into the gable end;
- Installation of bird nesting features to the building or a wall such as an integrated sparrow box and AfS S-Brick. Swift bricks could be incorporated into the main building. Integrated box installation shall accord with BS 42021:2022.
- Installation of an insect feature to the building or garden, such as an insect box or log pile;

8.0 Conclusions

- 8.1 Overall, the proposals are considered to represent a 'negligible' impact upon ecology and no further surveys are recommended. The proposal area consists of existing building and hard / bare surfaces of negligible ecological value.
- 8.2 The proposals are not anticipated to have any significant impact upon ecology; the building is unlikely to support bats and proposals stand a 'negligible' chance of disturbing bats or their roosts or foraging and commuting habitats providing some basic lighting control measures are undertaken. No further surveys are currently recommended at the site for these proposals.
- 8.3 No significant effects are anticipated upon the Pagham Harbour, South Downs Bat SACs, Bognor Reef SSSI or any other designated site, provided basic avoidance measures are built into the proposals, namely the contribution to the Pagham Harbour Access Management Plan.
- 8.4 When mitigation and enhancements have been taken into account, the proposals are not considered to have a negative impact upon habitats or protected species in accordance with planning policy and once enhancements are considered, would result in a minor net gain. The proposals would therefore accord with the relevant local and national planning policies and the relevant legislation.

9.0 Bibliography

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10.0 Appendix A - Site Photos



Photo 1 – Front of property (North elevation)

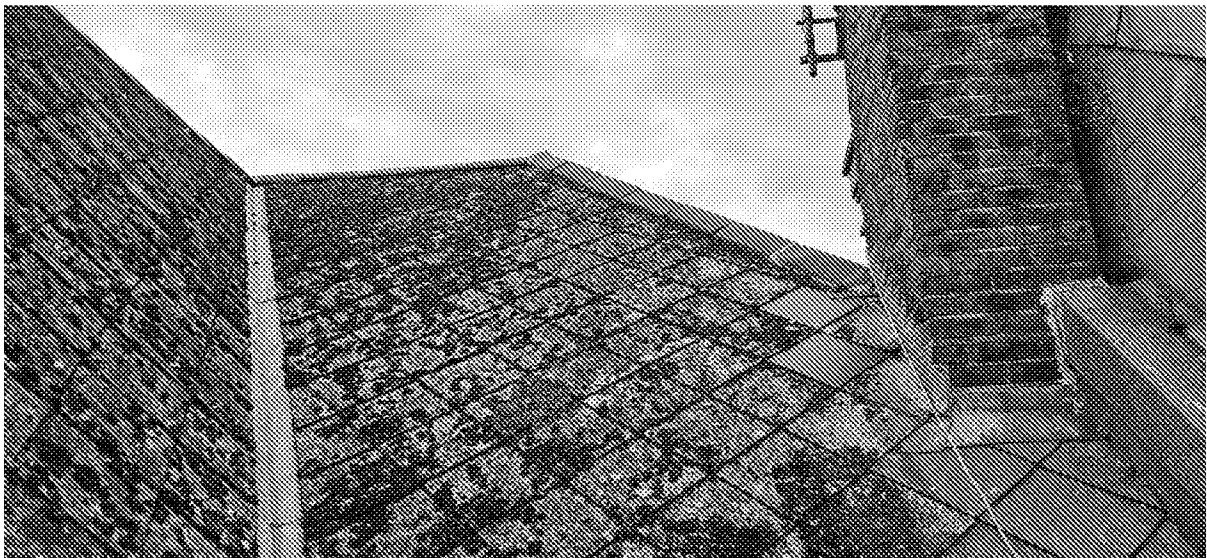


Photo 2 – Northwest main roof showing flat fibre slate effect tiles with clay ridge tiles, noting gaps underneath hip and ridge tiles plus well sealed chimney flashing

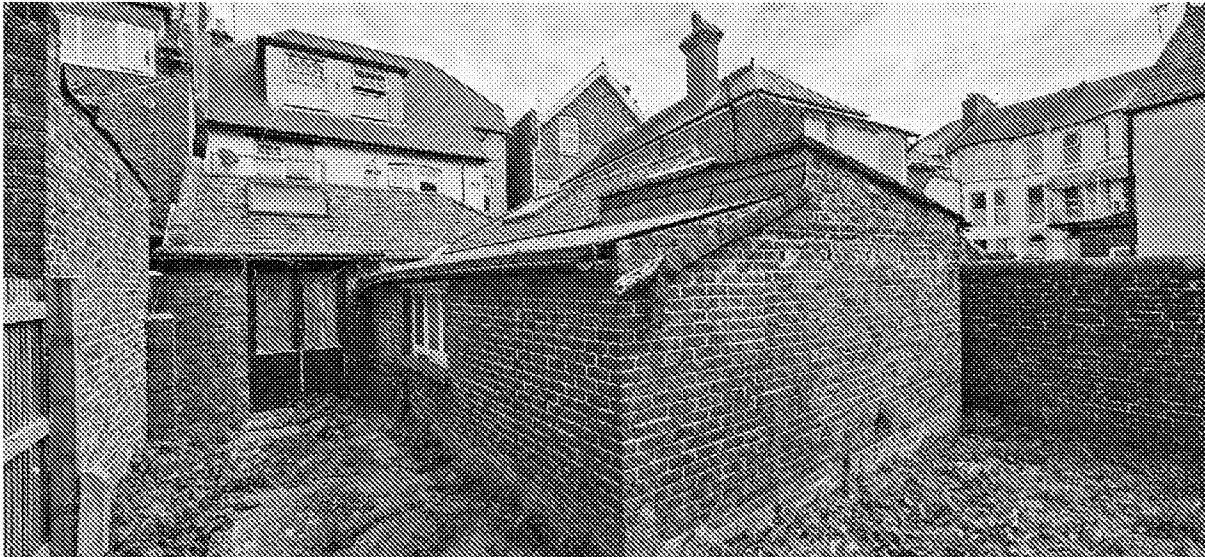


Photo 3 – Rear of property (South) from the rear courtyard with the current store areas in the foreground. Multiple signs of degradation to the building specifically with the timber fascia boards and doors/windows.



Photo 4 – Neighbouring property bordering the rear, southern, boundary. Multiple hanging tiles with gaps from missing or broken tiles

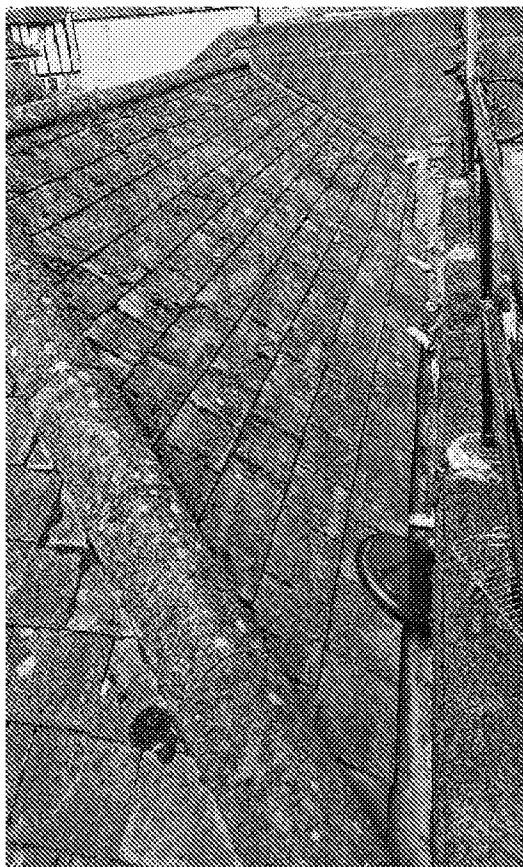


Photo 5 – Rear single-story roof in composite slate effect tiles with concrete hip and ridge tiles



Photo 6 – Timber soffit box on the back of the main roof highlighting gaps in the soffit and fascia



Photo 7 – Internal east wall of the storeroom with visible age to the plasterboard and insulation within this section of the building

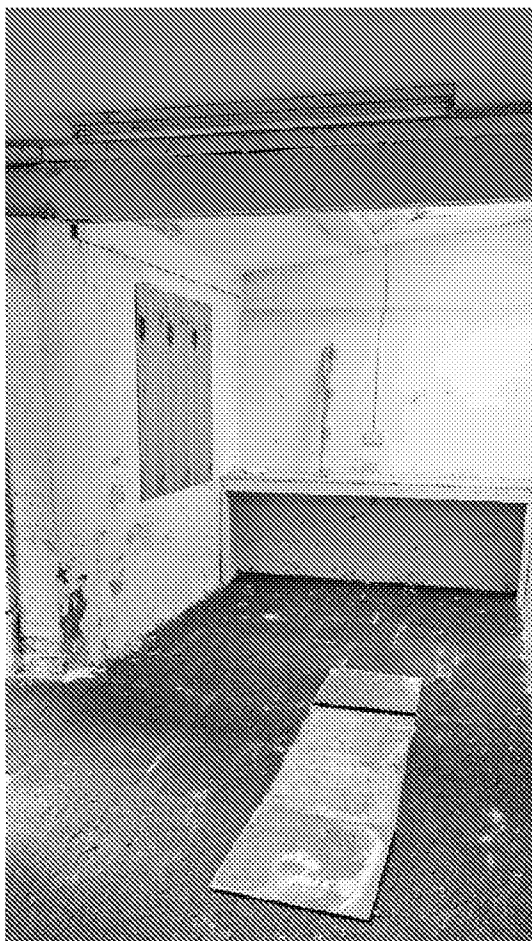


Photo 8 – Rear single-story section. Deceased rodents present in various areas



Photo 9 – Sealed damage of ceiling in storeroom



Photo 10 – Damaged lath and plaster of the ceiling in the rear of the commercial space

11.0 Appendix B - Site Maps



Figure 1: Aerial imagery of the site, displayed as a red polygon marker, and surrounding area. Map created using © 2023 Google Earth

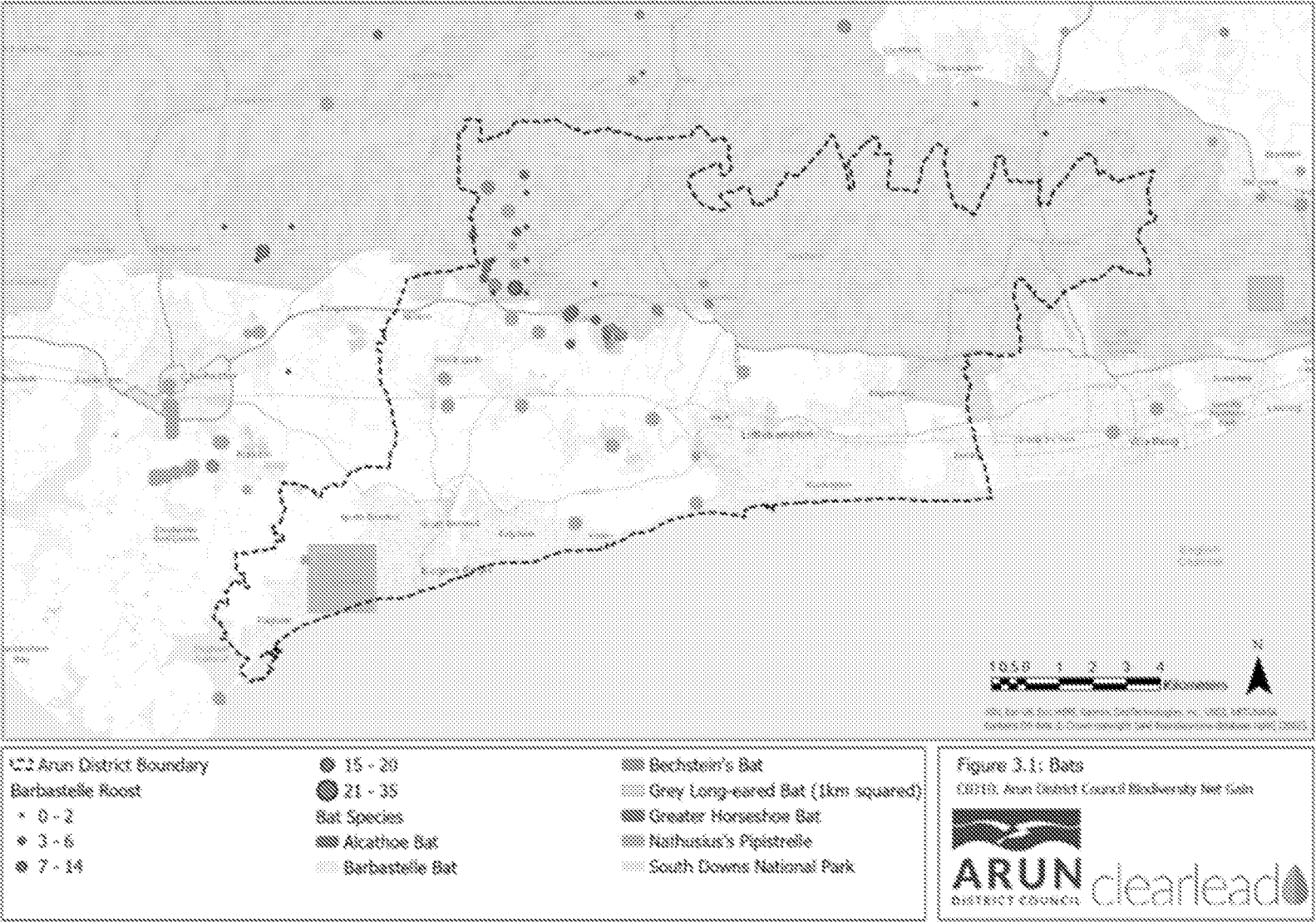


Figure 2: Map produced by Arun District Councils BNG Evidence Study focused on bats (ClearLead Consulting Limited, 2022)

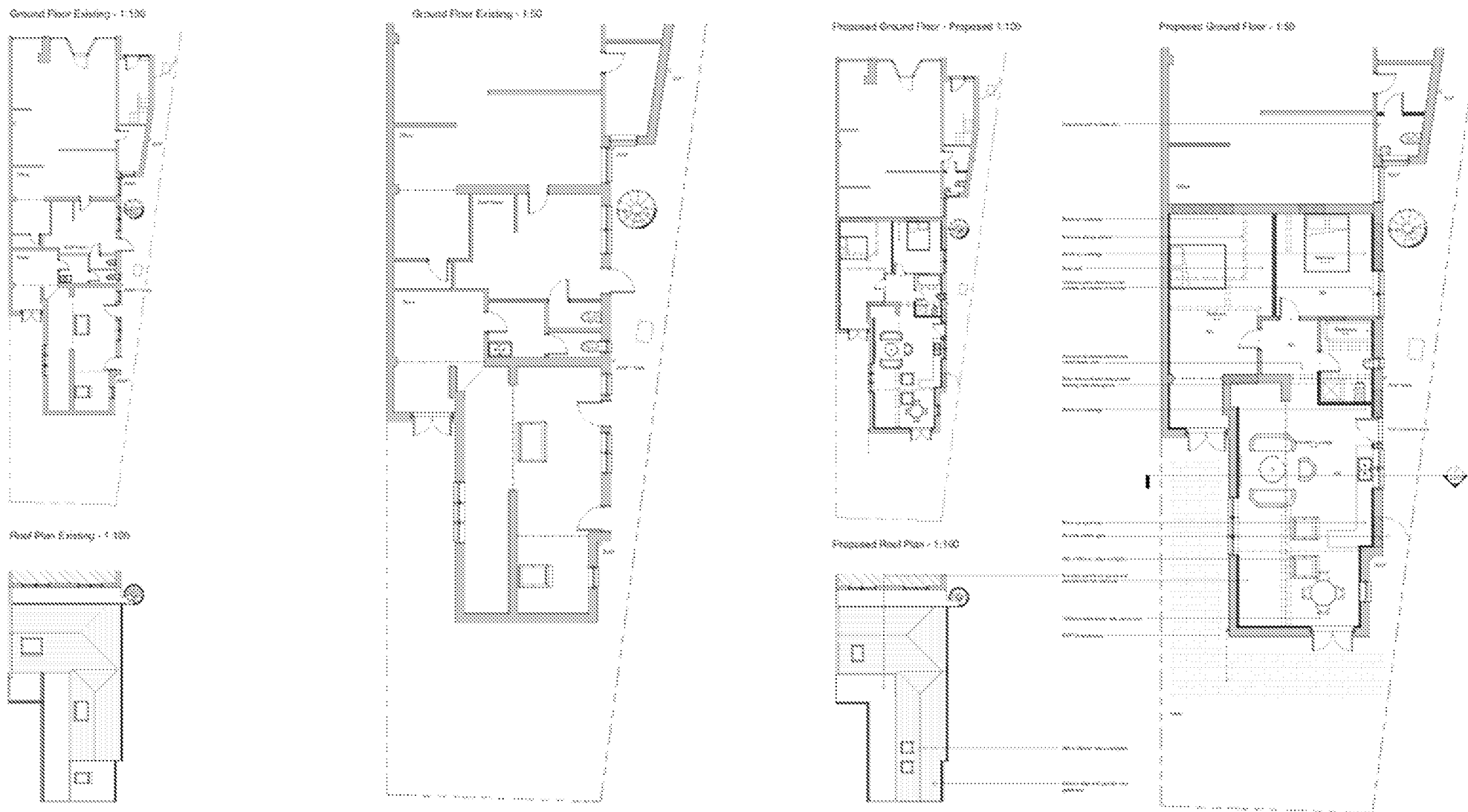


Figure 3: A comparison between existing (left) and proposed (right) plans produced by M.J Humphreys Ltd



Figure 4: M.J. Humphrey produced elevation plans between existing (top) and proposed (bottom)