



Our Ref: 2136.9/AM/kj

Planning Department
Arun District Council
Clarence Road
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West Sussex
PO21 1LD

7th December 2017

To whom it may concern

Land at former Eastergate Fruit Farm (ADC Ref: EG/71/14/OUT)

I write with regard to the Section 73 application for the proposed change of wording to Condition 12 of outline planning consent for the erection of 60 dwellings and associated access at the former Eastergate Fruit Farm (ADC Ref: EG/71/14/OUT).

Condition 12 currently requires that if there is a delay of greater than 24 months between the submission of a reserved matters application and the date of the ecological surveys submitted in support of the application, an updated survey report shall be submitted to support the reserved matters application.

The proposed amendment to Condition 12 requires that surveys are updated within 24 months of development commencing.

In view of the forthcoming reserved matters application in January/ early February 2018, I consider that the proposed amendment to the wording of Condition 12 is appropriate for the following reasons:

- I visited all areas of the site on 22nd September 2015 and there was no change in the character or extent of the habitats present. I understand that management has not changed in the intervening period. The baseline ecological survey work to hand therefore remains relevant to informing the forthcoming reserved matters application in terms of layout, landscape design and tree protection.
- Whilst the baseline survey information to hand remains suitable to inform the reserved matters application, regardless of the current wording of the Condition 12 it will be necessary to update ecological survey work *in advance of development commencing* in relation to more mobile species known to

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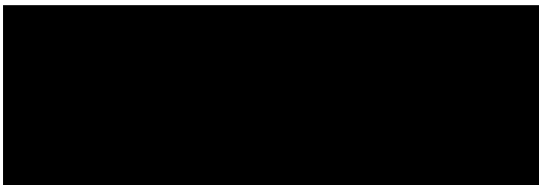
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occur at the site (namely bats and Badgers) in order to inform applications to Natural England for derogation licences. Such applications must be based on up-to-date survey information, and carried out at a suitable time of year. For example an application for a low impact bat licence must be supported by information from the most recent survey season and the site must have been inspected within 3 months of the licence application being made. This ensures that the proposed mitigation measures are based on the most up-to-date status of a species at the time of development commencing and that the most appropriate approach to avoidance and mitigation works will be applied.

- The proposed amendment to the wording of Condition 12 includes the preparation and submission of reports to the Council for approval prior to development works commencing. Similarly to the current wording this would allow the Council to review the ecological baseline of the site and comment on mitigation proposals prior to development, albeit fully up-to-date and relevant to the status of species at the time of works commencing.

I therefore considered that the proposed amendment to the wording of Condition 12 an appropriate mechanism to protect and maintain the ecological interest of the site at, and beyond, the time of the forthcoming reserved matters application.

Yours faithfully



Adrian Meurer MCIEEM

Director of Ecology