



11 April 2022

Our Ref: KC/20.211

David Easton
Arun District Council
Civic Officers
1 Maltravers Rd
Littlehampton
BN17 5LF

Dear Mr Easton,

Bognor Regis Golf Club
Outline Planning Application: FP/274/21/OUT
Full Planning Application: M/16/22/PL
Hallam Land Management Limited

I am writing on behalf of my client, Hallam Land Management Limited, in respect of the above planning applications and in response to Chichester District Council's Ecology Officer's consultation comments received on the 2nd March 2022. I note that the service provided by Ms Annalls came to an end in March she had limited time to review the application and her comments are brief. I have, nevertheless, set out below, by reference to Site A and Site B, a response to those comments to assist in your consideration of the applications.

Site A – Surveys

Bats

FPCR have surveyed the trees on Site A; identifying one with a roost present in the bat box. Please note that there are 11 trees which will be impacted by development. T94 appears to have been duplicated giving the appearance that there are 12 rather than 11 trees. FPCR will be surveying these trees again in April/May 2022.

The buildings on Site A were assessed in 2021 and no presence of bats was found, with all buildings having negligible bat roosting potential apart from the main golf clubhouse which is to be retained. This information is provided at Table 8 of Appendix 8.3 within the Environmental Statement.

FPCR will be completing the remaining bat activity surveys from April 2022.

Dormice

FPCR will be continuing the dormouse surveys from May to August 2022, however it is considered unlikely that dormice will be recorded onsite as they were absent during surveys in 2016.

Water Voles

FPCR have undertaken water vole surveys on the ditch networks within the site in 2016 (July & September), 2017 (May) and 2021 (September); where evidence was found that informed the ES

Chapter (paragraph 8.14 & 8.15), which identified that the water vole population within the site is of local importance. Their presence has then also led to a number of mitigation measures proposed (paragraph 8.79 & 8.92), to ensure that there will be a minor beneficial permanent direct long term effect at a local level for the species (paragraph 8.147); which in turn will improve their Favourable Conservation Status into the future.

In the assessment FPCR had identified that approximately 600m of ditch will be lost to the development and that mitigation measures will be adopted during the construction phase to ensure that water voles are protected. The scheme will see a total of 2,211m of new ditches will be created, making a total of 3,737m of ditch habitat across the site accessible to the water vole populations in the future. The retained ditches will be enhanced, and the new ditches will be designed to support water voles with specific planting to ensure year long food supplies, which is currently absent.

The water vole presence within the site has fluctuated over these years which FPCR have surveyed, which is a trend that unfortunately is the case where ditches systems are not managed sympathetically for this species. However, at this outline stage the evidence that we have gained, has highlighted that water voles are present and as such mitigation measures have been suggested based on those initial findings, whereby there will be a subsequent improvement in the quality and quantity of the habitats provided.

The surveys have been completed following the best practice guidance (The Water Vole Mitigation Handbook, Mammal Society (2016) and Water Vole Field Signs and Habitat Assessment: A Practical Guide to Water vole Surveys, (2021)) , and although there is one outstanding survey to be completed in May (during the optimal period) measures have been adopted to secure water voles future utilisation of the site and it is felt that regardless of this outstanding survey that FPCR have enough information to assess the effects on them and mitigated accordingly. The fluctuations in water vole populations will inevitably change, and at reserve matters further surveys will be needed to fine tune the mitigation measures we have adopted at outline to ensure the final design is applicable to those methods suggested, which may include possible Natural England licence requirements. FPCR will complete the survey in May 2022.

Survey Outcomes

The outcome of the above additional surveys will be provided to the Council.

Site A – additional comments

This is an outline planning application with details for appearance, layout, landscape and scale to be prepared and submitted at the Reserved Matters stage. Details relating to buffer strips and lighting restrictions cannot be addressed in full at this stage.

However, the Green and Blue Infrastructure (ref: 171-UW-P-A-008) and Land Use (ref: 171-UW-P-A-005) parameter plans demonstrate the proposals for the scheme to include extensive green infrastructure across the western extent of the site. The area surrounding the Lidsey Rife is included within this area of green infrastructure and as requested in the response will be maintained, enhanced and protected through this scheme. All but one category A trees on Site A will be retained through the scheme seeking to retain the high category trees on site. The development will be avoiding the root protection areas of the retained trees as far as possible.

The development will see the planting of an additional 4.23 ha of woodland and tree groupings set within parkland and new areas of habitat. These will be located predominantly to the north and west of the development albeit smaller pockets of new tree planting are proposed within the main body of the site. Additionally, circa 120 new specimen street trees will be incorporated within residential streets. The Design and Access Statement sets out how the enhancement of retained habitats to the west, nearer the Lidsey Rife and the inclusion of new hedgerows, woodland, waterbodies, a variety of



grassland and ditches, will ensure opportunities for continued use by existing and new fauna. Existing and new hedgerows/ woodlands will have native species that provide a foraging resource through species bearing fruits and nuts, which will benefit the local bird population and small mammals. Waterbodies will increase the area of standing water, and will be designed with biodiversity enhancements such as a variety of water permanence and bank profiles, which will allow for increased invertebrate assemblages, providing foraging opportunities for amphibians, reptiles and mammals such as bats.

The lighting strategy will be prepared once the final layout is prepared and will consider the bat surveys undertaken to date, this is a detailed matter which will be addressed through the Reserved Matters application. The lighting strategy will respond to any bat corridors as necessary through minimising light spill with downwards facing lighting.

The mitigation measures proposed for reptiles are outlined in the ES chapter (para 8.90 and 8.91) and includes measures such as using hi-visibility fencing to protect retained habitat areas where reptiles were recorded being protected by and where losses are to take place either a passive displacement or trapping and translocation exercise will be undertaken. Individuals will be passively displaced, or caught and relocated to areas of green infrastructure to the west that will comprise reptile suitable habitats, so ensuring a Favourable Conservation Status is maintained. We believe this is enough information to support the outline planning application and a detailed reptile mitigation can be secured through an appropriately worded planning condition.

Site B Surveys

Bats

FPCR will be completing the activity surveys from April 2022 onwards.

None of the trees on Site B that have identified as having potential for bats identified are to be removed through the proposed development. It is not considered necessary to undertake further surveys.

Wintering Bird Surveys

FPCR have undertaken these surveys in November 2021 to March 2022, inclusive.

Dormice

FPCR will be continuing with dormouse surveys from May 2022.

Water Vole

There were no water voles found within the September 2021 surveys completed by FPCR, however an additional survey will be complete by FPCR in May 2022.

Survey Outcomes

The outcome of the above additional surveys will be provided to the Council.

Site B – Additional Comments

As set out in Table 3.2 of the Planning Statement for Site B there are no category A or B trees proposed to be removed as part of this proposed development, there is some hedgerow removal including 70m to create the access into the Site as set out at paragraph 3.48 of the Environmental Statement. The remaining trees and hedgerows on this site will be retained, protected and enhanced as set out on the Soft Landscaping Plans (ref: 171-UW-P-B-025 Sheets 1 to 6). This planting scheme includes buffer strips to the existing areas of woodland and along the Ryebank Rife.

A Lighting Strategy prepared by Ridge with input from FPCR to take account of survey work in relation to bats. There are key areas which will have minimal lighting levels, for example the foliage at the north of the site between the access road and the car park. The luminaires have been proposed and located to

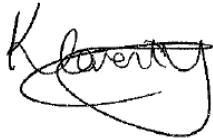


prevent the spread of light in an upward direction and to limit the spill of light and glare beyond the site boundary. The external lighting will cause no overspill out of the site boundary, as the buildings and car park is located away from the site boundary. Other than this, the proposals do not including lighting for the golf course or flood lighting for the driving range.

I hope the above provides clarity on the status of the ecology surveys for these two sites and the work undertaken to date, as part of the Environmental Impact Assessment, in respect of ecology.

Should you have any further queries please do not hesitate in contacting me.

Yours sincerely,



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cc Client

