

## **Ecology Comments**

**Date: 07/03/2025**

**Address: Land at Ford Airfield**

**Application:**

**F/14/24/RES: Approval of reserved matters (layout, scale, appearance and landscaping) following outline consent F/4/20/OUT for the infrastructure reserved matters including the provision of a primary spine road and associated secondary road junctions, pavement, footpaths, cycle infrastructure and bus stops; site wide drainage infrastructure including foul pumping stations, foul sewer infrastructure, SUDS basins, SUDS swales, surface water infrastructure; acoustic fencing; public open space including landscape details, play areas, footpaths & associated works. This application affects a Public Right of Way, may affect the setting of a Listed Building and falls within CIL Zone 1 (Ford strategic site - zero rated).**

**F/15/24/RES: Approval of reserved matters (layout, scale, appearance and landscaping) following outline permission F/4/20/OUT for phase RM1 (North), for the erection of 341 No. residential dwellings plus associated roads, infrastructure, parking, landscaping and associated works. This application affects a Public Right of Way, may affect the setting of a Listed Building and falls within CIL Zone 1 (Ford strategic site - zero rated).**

**F/16/24/RES: Approval of reserved matters following outline permission F/4/20/OUT for phase reserved matters 4 (south), for the erection of 357 No. residential dwellings plus associated roads, infrastructure, parking, landscaping, open space & play areas and associated works. This application affects a Public Right of Way, may affect the setting of a Listed Building and falls within CIL Zone 1 (Ford strategic site - zero rated).**

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**Recommendation: No objection subject to conditions**

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**Relevant imposed ecology conditions for F/4/20/OUT:**

Condition 15: Prior to commencement of development (excluding demolition) in each phase, as defined within the Phasing Strategy under Condition 5, a scheme for external lighting for that phase shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall ensure that the lighting is sensitive to bats and shall comply with the Institution of Lighting Professionals Guidance Note for the Reduction of Obtrusive Light.

Condition 16: requires a badger survey to be undertaken prior to each phase identified by the phasing plan to be approved under Condition 5. Therefore, impacts relating to badgers has been addressed.

Condition 17: Prior to the commencement of development an Ecological Protection and Enhancement Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall include details of:

- Mitigation measures to restrict human and dog access to areas of habitat suitable for Bewick's swan and the screening of movement on adjacent public footpaths with clear timelines for each mitigation measure to be carried out.
- Reptile and amphibian habitat management
- High quality green infrastructure routes across the site
- Wildflower meadow planting
- Filling of gaps in tree lines and hedgerows with appropriate nature species
- Wildlife ponds and / or wetland areas
- Bat bricks / tiles integrated into the buildings onsite facing south/south-west
- Inclusion of gaps at the bottom of fences to allow movement of small mammals across the site
- Provision of log piles and hedgehog nesting boxes

The approved plan shall be implemented in full in accordance with the agreed timings and details on a phase by phase basis as defined by the Phasing Strategy under Condition 5, where relevant.

Condition 18: Details for the delivery of the approved measures through the Ecological Protection and Enhancement Plan (Condition 17) shall accompany each reserved matters application for each phase as identified within the Phasing Strategy under Condition 5. This shall include details of how and where the measures approved through Condition 17 are to be delivered as part of each phase.

## **Introduction**

I have reviewed the reserved matters applications with regards to ecology and Biodiversity Net Gain (BNG) and the following documents:

- Ecological Protection and Enhancement Plan RM1\_06B December 2024
- Ecological Protection and Enhancement Plan RM4\_06B December 2024
- Ecological Protection and Enhancement Plan IRM\_02B December 2024
- Biodiversity Net Gain Assessment IRM\_07. A
- Biodiversity Net Gain Assessment RM1\_11. A
- Biodiversity Net Gain Assessment RM4\_11A

### **Biodiversity Net Gain**

A BNG assessment has been submitted to support these applications.

The Outline planning permission F/4/20/OUT was approved before the 10% BNG uplift became mandatory. Therefore, BNG is not a statutory requirement for this application, however Arun local Plan Policy ENV DM5 still applies in so far as the applicant shall in the first instance seek to secure a net gain.

The Biodiversity Net Gain Assessments (IRM\_07. A, RM1\_11. A, RM4\_11A) demonstrate the following results.

- Net gain of +33.28 BU for area habitats, equivalent to +19.23%, associated with the current development proposals.
- Net gain of +6.32 BU for linear habitats, equivalent to +28.29%, associated with the current development proposals.

Whilst this was undertaken at the outline stage, and therefore this is unlikely to be the exact figure, there will likely be a positive net gain of biodiversity. This meets the requirements of policy ENV DM5 of the local plan.

The report states that the proposed development will not satisfy trading rules associated with Medium Distinctiveness habitats (Heathland and shrub – Bramble scrub). However, the development will create a mosaic of habitats beneficial for wildlife.

### **Habitats**

The Ecological Protection and Enhancement Plan provides details for the following habitats:

- Parkland
- Tree and Hedgerow Planting
- Woodland
- Wildflower Grassland
- Scrub Planting
- Orchard

- Sustainable drainage system basins
- Amenity grassland and ornamental planting

### *Hedgerow Planting*

Native Hedgerows are proposed within the site; however, the ratio of planting does not allow for a 50% Hawthorn, which is considered a typical native hedgerow. Unless there are reasons of character that would support the currently proposed mix, the mix should be altered to provide at least 50% hawthorn.

### **Species:**

Desktop assessments and surveys were undertaken for the following species:

- Bats
- Badger
- Hazel Dormouse
- Water Vole
- Birds,
- Reptiles
- Great Crested Newts
- Invertebrates

These were all considered acceptable.

### **Bats**

A suite of bat surveys was undertaken onsite by Ecological Survey and Assessment (ECOSA) between 2017 and 2018. No bat roosts were identified on site.

The automated detector surveys recorded passes from 10 species of bat including Long-eared bats and the rare Barbastelle and one pass by a greater horseshoe bat. The ECOLOGICAL PROTECTION AND ENHANCEMENT PLAN states that UES carried out an updated bat scoping survey in June 2024 and have recently produced an updated bat presence / absence survey, ground-level tree assessment and aerial tree assessment, to determine the suitability of the buildings and trees onsite to support roosting bats. This report has been submitted to support Application F/28/24/DOC and is acceptable.

No evidence of bat roosting in the buildings was recorded and Low levels of bat use of the site by common species were recorded.

Mitigation within F/14/24/RES (the infrastructure and open areas) is proposed through installation of 11no. Schwegler 2F and 2FN bat boxes – fitted to semi-mature / mature trees which are due to be retained within the proposed development site. The boxes will be placed at a height of 4-6m and on a south-facing aspect. The type of boxes and their locations are acceptable.

For F/16/24 RES the report RM4\_06B states that 174 no. Vivara Pro build-in woodstone bat boxes are proposed to be integrated within the external wall of the newly constructed buildings. The bat boxes should be positioned as high as possible on the southerly aspect to expose the boxes to high levels of sunlight. bat boxes are proposed across this parcel.

For F/15/24/RES the report RM1\_06B 341 states that 106. Vivara Pro build-in woodstone bat boxes will be provided as part of this phase of the development.

A sensitive lighting strategy will be developed in accordance with the Bat Conservation Trust's (BCT) bats and artificial lighting at night guidance note (08/23), as per condition 15 of F/4/20/OUT. It's noted that there will be reduced street lighting across the site, which is also positive.

Larger hibernation boxes could be installed on established trees and woodland within the site. The open space included within IRM, for example along the Arun Way and in the Landings Green could incorporate additional external bat boxes.

Overall, the proposed mitigation for bats is acceptable.

### **Birds**

Wintering bird surveys were undertaken at the site by Artemis between November 2015 and February 2016 (Artemis, 2016). A total of 56 species were recorded during the field surveys. ECOSA also undertook breeding bird surveys of the proposed development site between May and June 2017, which recorded species on both the red and amber lists breeding onsite including skylark *Alauda arvensis*, song thrush *Turdus philomelos*, dunnock *Prunella modularis*, and stock dove *Columba oenas*.

### *Bird boxes*

The Ecological Protection and Enhancement Plans (RM1\_06. B, RM4\_06. B, IRM\_02.B) states that the bird boxes will be made up of:

- Vivara Pro woodstone house sparrow nest box - integrated within the external wall of the newly constructed buildings, below the eaves on the northern elevation.
- Vivara Pro woodstone swift nest box – integrated within the external wall of the newly constructed buildings, below the eaves on the northern elevation. The box

should be installed at a minimum height of 5m with an unobstructed entry point beneath the box.

- Schwegler 1B bird nest box (26mm, 32mm and oval entrances) – affixed to semi-mature / mature trees which are due to be retained within the proposed development site, at a height of 3-6m, and should be positioned on the northern or eastern aspect of the selected trees, thus avoiding the strongest sunlight and wettest winds.
- The appendix plans reference a House Martin Next Box as an option for internal

These bird boxes are acceptable; however, the plans provided do not provide a breakdown of how many boxes of each are to be provided. Given the universal nature of swift boxes, these should be prioritised.

The bird boxes are proposed in the following:

Application Reference	Integrated Bird Boxes	Non-integrated Bird Boxes
F/14/24/RES	N/A	9
F/15/24/RES	141 no. Bird boxes	N/A
F/16/24/RES	152no. Bird boxes	N/A

A ratio of at least 1:1 nest brick per dwelling is now generally accepted as good practice however on larger developments (100+ units) a ratio of 1:2 nest bricks is accepted as long as bat bricks are included at a ratio of 1:2. This would mean providing 170 bird boxes within F/15/24/RES and 178 bird boxes for F/16/24/RES. There is a shortfall in this provision, however this could be adequately amended or conditioned.

The applicant states “If the proposed model of bird box is not available due to stock shortages, an alternative model can be used instead. All proposed changes must be discussed and agreed with the project ecologist to ensure that they provide similar nesting opportunities” and “the exact ratio of bat to bird boxes will be determined during the construction phase based on availability of products”. This is not acceptable, as it does not provide certainty. All changes must be approved by the Local Planning Authority.

Subject to some small changes and additional information, I have no objection to the mitigation proposed.

#### **Arun Valley Special Protection Area (SPA)**

Part of the site is within the Arun Valley SPA Impact Risk Zone 2. The outline application was screened in, and mitigation measures were put forward under the Appropriate

Assessment (AA) undertaken at that stage. A shadow HRA was completed in 2020. The report recommended:

- Screening of particular PROW's (through the use of hedgerows and stockproof fencing) where they cross functionally linked land in the surrounding areas to protect Bewick Swans from recreational pressure resulting from the development. The details are secured through Condition 17.
- Increasing public awareness through interpretation boards throughout the site and leaflets provided as part of the sale. The details are to be secured through Condition 17 (except for locations, which need to be secured as part of the layout through the RM)
- Monitoring surveys will be undertaken in year one, three and five after first occupation to ensure the mitigation is successful.

The Ecological Protection and Enhancement Plans RM1\_06.B December 2024, IM1\_02.B December 2024, and RM4\_06.B December 2024 do not include details of the timelines of the delivery of the Bewick Swan mitigation measures to restrict human and dog access to areas of habitat suitable for Bewick's swan and the screening of movement on adjacent public footpaths, as required by condition 18. However, this is also required as part of Condition 17, and therefore there are no objections to this being secured as part of the condition.

The locations of the interpretation boards have not been identified within the proposals, which are relevant to the layout in this application, however it is accepted that this could be conditioned as part of the reserved matters.

An Appropriate Assessment (AA) is required for all of the reserved matters involving approval of mitigation measures.

### **Reptiles and Amphibians**

Given the lack of access to some of the offsite ponds in 2017 and the amount of time that has passed since the previous surveys, UES carried out updated GCN HSI and eDNA surveys in June 2024. Access was provided to Pond 1 and Ditches 1, 2, 5, 6, 7 and 8. Pond 1 and Ditches 5 and 8 were subject to eDNA analysis which returned negative results, indicating the absence of GCNs; Ditches 1, 2, 6 and 7 were dry at the time of survey and therefore could not be subject to eDNA analysis.

Given the results of the surveys undertaken to date, GCN are considered as likely absent from the proposed development site. However, due to the potential presence of common amphibian species, reasonable avoidance measures (RAMs) will be implemented during the construction phase of the development to protect amphibians on the chance they are present onsite during the works.

Artemis Ecological Consulting Limited carried out a Phase 1 Habitat Survey in July and August 2015, and August 2016, which identified a single, adult common lizard *Zootoca vivipara* within a grassland in the eastern section of the proposed development site.

A full suite of reptile surveys were undertaken by ECOSA in 2017 (see report reference: 2921-9.3. F0). A single adult common lizard was identified in July 2017 within the northern section of the northern land parcel. In addition, two slow-worms *Anguis fragilis* were identified offsite but directly adjacent to the eastern boundary of the proposed development site during the GCN impact assessment and eDNA survey undertaken by UES in June 2024.

The document states that 'Due to the known presence of reptiles within the surrounding area, the following RAMs will be implemented during the construction phase of the development to protect reptiles on the chance they are present onsite during the works.

Reasonable Avoidance Measures (RAMs) will be implemented during the construction phase of the development to minimise potential harm to reptiles and amphibians.

- The unmanaged arable fields, tall ruderal and any areas of grassland within the proposed working area are to be mown to have a sward length below 10cm. This mowing is to take place at least 24 hours prior to the start of development works. This is to give any reptiles present time to move off site of their own accord. The mown / cleared areas will then be maintained with a short sward until the works on site have been completed.
- No excavations are to be left open overnight. If this is not feasible a plank should be left within the excavation at a 45-degree angle to allow trapped wildlife to escape. Any open excavations should be checked for trapped wildlife in the morning prior to start of works on site.
- Where possible, materials will be stored on pallets off the ground in order to reduce the risk of reptiles sheltering underneath them.'

These reasonable avoidance measures are acceptable for reptiles and amphibians.

5 no. hibernacula and 9 log piles are being provided across the site (within IRM F/14/24/RES) which will help both reptiles and amphibians, and is acceptable. The Hibernacula specification provided within the Ecological Protection and Enhancement Plan should be conditioned.

### **Badgers**

Signs of Badgers were included in several site surveys and assessments. No Badgers or setts were recorded during the surveys.

The document states Reasonable Avoidance Measures (RAMs) will be implemented during the construction phase of the development to minimise potential harm to mammals to negligible levels.

The document set out the following measures:

- Regular site checks must be undertaken during the construction phase of the development to ensure that no new setts have been created. If there is any doubt whether an excavation may support badgers, UES will be contactable on 01565 757 788 throughout the duration of the works.
- No trenches or excavations will be left open overnight. They will be backfilled or covered with board or alternatively fitted with a means of escape for any badger (or other animal) which may become trapped within, such as a plank or slope leading out of the bottom of the excavation at an angle of 45°.
- Excavations will be checked before they are backfilled to ensure that no animals have become trapped.
- Any chemicals or harmful materials will be stored so that they cannot be accessed by badgers or other animals.

The proposed RAMs are acceptable for badgers and other mammals.

### **Hazel dormouse**

ECOSA carried out hazel dormouse *Muscardinus avellanarius* surveys in June-September 2017 (see report reference: 2921-9.3. F0). No evidence of hazel dormice was identified during these surveys and as such, they were considered likely absent from the site. There are limited areas of suitable habitat within the surrounding landscape and the majority of the proposed development site is unsuitable to support hazel dormice. The relatively small areas of woodland and hedgerows onsite provide somewhat suitable habitat for hazel dormice; however, they are isolated from the wider landscape and the site is unlikely to be colonised by hazel dormice in the future.

The document states:

Reasonable Avoidance Measures (RAMs) will be implemented during the construction phase of the development to minimise potential harm to dormice, including a pre-commencement check, to protect hazel dormice on the chance they are present onsite during the works.

- No woodland, scrub or hedgerow clearance will take place between June and September inclusive when females would have dependent young, or between December and March inclusive when dormice would be hibernating.
- Phased vegetation clearance of any existing hedgerows, woodland or scrub that will be by the works. These habitats should be removed in a way that directs

individuals in the of remaining suitable habitat such as retained hedgerows at the site boundaries.

### **Invertebrates**

Bee bricks are proposed in both residential Reserved Matters application (5no. in RM4, and 9no. in RM1) within the dwelling walls. Given the scope of the development and loss of greenspace, this number should be increased.

12no. Schwegler Insect Nesting Aid (insect houses) are proposed to be fitted to semi-mature / mature trees which are due to be retained within the proposed development site (within application F/14/24/RES). The locations for the proposed insect boxes are acceptable. However, the locations are primarily within the northern section of the site, and as a result more freestanding insect boxes should be included within areas without existing mature trees.

The statement suggests “If the proposed model of insect box is not available due to stock shortages, an alternative model can be used instead. All proposed changes must be discussed and agreed with the project ecologist.” However, this is not acceptable, as this needs to be agreed with the Local Planning Authority.

### **Hedgehogs**

The Ecological Protection and Enhancement Plan suggest that fences will be designed to allow fences to have a gap at the base as a hedgehog highway. Hedgehog holes will be installed on any fences onsite to allow passage. Hedgehog highways are small 13cm x 13cm holes at the base of fences. Hedgehog highways will be incorporated beneath every fence where residential gardens meet such that there is a continuous path for hedgehogs and small mammals throughout the residential gardens. In order to promote their retention, there should be a sign and information on their use. Locations of log/brash piles have been identified and specified, which is acceptable.

In addition, hedgehogs nest boxes have been identified in terms of their number and location, which is acceptable, but no specification has been provided. This could be adequately conditioned.

### **Invasive Species**

The application F/14/24 RES notes that Japanese Knotweed is present. The proposed methods of isolating and eradicating the Knotweed within that applications Ecological Protection and Enhancement Plan is acceptable.

The presence and timings of addressing this species should be included in the Ecological Protection and Enhancement Plans for F/15/24/RES and F/16/24/RES.

### **Timings**

We don't have any information on the timings of the delivery for each of these aspects in accordance with Condition 18. Timings of the implementation during the stages of the development are required, however it is accepted that these could be adequately conditioned as part of the RM.