

Philip Hailey
239 Pagham Road

PO213QB

Your Ref: OWPC14263

Our Ref: P/48/17/PL

15-05-2017

Please ask for:

Mr S Davis

16th June 2017

Dear Sir/Madam

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Application for variation of condition no's 28 & 29 imposed on planning permission
P/125/14/PL for the relocation of reptiles to an off site receptor site.

251 Pagham Road & the Land R/O 251 Pagham Road Pagham

Thank you for your internet representation made on 15th June 2017 which has been recorded
as '**an objection**' with the comments as follows:

*I strongly object to the variation of condition no's 28 & 29 imposed on planning permission
P/125/14/PL for the following reasons*

- 1. Potential loss of proposed wildlife and habitat improvement works proposed on
approved application P/125/14/PL*
- 2. Contrary to Natural England's advice*
- 3. Translocation of slow worms would be destructive as identified in research published
by Science Direct*
- 4. Contrary to Government Standing Advice*

Expanding on these points

*1. The developer is seeking to fast track the development of housing to the detriment of
the existing wildlife habitat. The wildlife buffer and habitat improvement works were
identified on the original application as it was accepted that suitable habitat for wildlife
(including reptiles) needed to be provided within the development site. Translocation of
these reptiles will likely result in the applicant requesting the removal of provision of the
need for wildlife buffer and habitat improvements on site to which I am strongly opposed
to.*

*2. Removal of the reptiles outside of the Arun District Council area would be contrary to
Natural England Technical Information Note TIN 102.*

*3. Research that has been carried out and published by Science Direct
(www.sciencedirect.com/science/article/pii/S0006320799000233) on translocation of slow
worms and the following comment was noted*

Abstract

*Translocation is often used as mitigation in cases where sites containing protected species
are threatened by development. However, the conservation value of such exercises is
unproven for many species. This paper describes a case study in which translocation was
used as a mitigation measure for the slow-worm (*Anguis fragilis*) a cryptic legless lizard. At
a site scheduled for development, the removal of 103 lizards over a three-month period
resulted in no significant depletion of the population. At the receptor site, which had no*

previous slow-worm population, recaptures of translocated slow-worms declined during 2 years of subsequent monitoring; recaptured lizards were in poorer condition than those in a nearby natural population; and there was little evidence of successful reproduction. As the exercise may have prevented the inadvertent killing of a number of slow-worms, it may have been successful in terms of meeting the statutory obligations for this species. As an exercise in conserving the population in the long-term, however, the value of the translocation was questionable.

4. The proposal is contrary to Government Standing Advice for Local Authorities who need to assess the impact of development on reptiles. (Updated in March, 2015)

Namely,

For reptiles, mitigation planning should include:

consider changing the layout and not developing the areas used by reptiles

displace them from sensitive areas by changing the vegetation

changing the timing of the work

move the reptiles (translocate) to another area that has been specially prepared, but only as a last resort, maintaining networks across the site (for large schemes).

Moving reptiles (translocation) as mitigation

If you need to move reptiles to a new location you'll have to choose a receptor site:

as close as possible to the development site, and within the same local planning authority if possible

that doesn't currently support the same species, but can be improved to make it suitable

You must allow enough time for new habitats to become suitable for the reptiles before you start to capture them.

Allow enough time to capture and release the reptiles, ... 1 year is usually enough.

If you are minded to approve this variation of condition against national guidelines and my objection I would be pleased if you would give me an opportunity to present my case to the officer(s) or Councillors making the final decision.

Your views will be considered before the application is determined and I shall write to inform you of any decision made.

Please be aware that if the application is to be determined by the Council's Development Control committee and your letter has been received at a late stage after the Agenda has been published you will not receive a separate letter notifying you of the date of the meeting and procedures for public speaking. In such circumstances it is recommended that you track the progress of the application on the Council's website or telephone the Council for further information. Please be advised that any comments you make that are not included within the Committee Agenda will be reported to the Members of the Development Control committee. Please also be aware that only a small number of all planning applications received go the Development Control Committee. Most are determined under delegated powers by Officers in which case your comments will again be considered before the application is determined.

Please be aware that Planning Services operate an 'open file' policy and will publish details of your comments on the internet on the Arun District Council Planning section. Please ensure that you only provide information that you are happy will be made available in this way. If you supply information belonging to a third party, please ensure you have their permission to do so. If you do not wish your comments to appear on the 'open file' please confirm this in writing and I will arrange for it to be destroyed although this means that its contents will then be disregarded.

In the event of a subsequent written representations appeal, against a refusal of planning permission on a householder application, any representations made on the application will be automatically forwarded to the Secretary of State. Unlike all other types of appeal, there will be no further opportunity to comment at the appeal stage.

Yours faithfully

Neil Crowther
Group Head of Planning