

8th November 2022

Maria Tomalova
Arun District Council
Maltravers Road
Littlehampton
West Sussex BN17 5LF

By email only

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Arun District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: P/60/22/PL
Location: Grey Barn Church Lane Pagham PO21 4NX
Proposal: Replace existing conservatory with front porch, single storey rear extension and dormer windows. Extension of existing garage and part conversion to tourist accommodation. This application may affect the setting of a Listed Building.

Dear Maria,

Thank you for re-consulting Place Services on the above application.

No objection subject to securing

- a) a proportionate financial contribution towards Arun SAMM;**
- b) biodiversity mitigation and enhancement measures.**

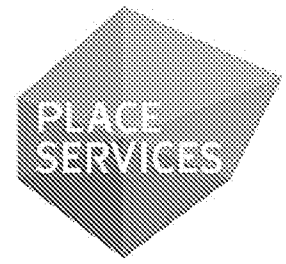
Summary

We have reviewed the following documents relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation:

- Consultation response (Natural England, ref: 392783, 7th June 2022);
- Consultation response (Natural England, ref: 406349, 20th September 2022);
- Preliminary Bat Roost Assessment (South Downs Ecology, November 2022).

We are now satisfied that there is sufficient ecological information available for determination of this application.

A desktop study of the site has concluded that the site lies under 100m away from Pagham Harbour SPA, SAC, Ramsar site and SSSI. The Preliminary Bat Roost Assessment (South Downs Ecology, November 2022) states "Indirect impacts include increased recreational disturbance of birds forming a qualifying feature of the Pagham Harbour SPA. The site is located on the edge of the footpath along the North Wall and as such,



an increase in overnight accommodation is highly likely to result in increased recreational disturbance." Natural England were re-consulted stating *"No objection subject to securing appropriate mitigation"*.

Therefore, as the development will result in an increase in overnight accommodation, it will trigger the need for a financial contribution for the delivery of mitigation measures for additional recreational impacts on Pagham Harbour SPA, in combination with other plans and projects. This is predicted by the adopted Arun SAMM Scheme (Strategic Access Management and Monitoring of the sites, also known as the Bird Aware Scheme) and the LPA is advised to secure this financial contribution by a legal agreement and record this mitigation in its project level HRA Appropriate Assessment.

The reviewed Preliminary Bat Roost Assessment (South Downs Ecology, November 2022) states *"The applicant is committed to contribute the appropriate amount (as determined by the LPA) to the Solent Bird Aware Scheme."*

This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

The Preliminary Bat Roost Assessment (South Downs Ecology, November 2022) has identified a "low" bat roost potential, with proposals not impacting any areas of the building with roost potential. Recent re-roofing work has taken place before the bat roost potential could be assessed. Avoidance and mitigation measures are recommended. *"To compensate for the possibility of bats having been disturbed through roofing works, the new building extension shall include integrated bat roost features such as integrated bat boxes, to ensure no loss of potential roosting opportunities on the site."*

The mitigation measures identified in the Preliminary Bat Roost Assessment (South Downs Ecology, November 2022) should be secured by a condition of any consent and implemented in full. This is necessary to conserve and enhance protected and Priority species particularly bats, Hedgehogs and breeding birds.

We also support the proposed reasonable biodiversity enhancements, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 174d of the National Planning Policy Framework (2021). Details of the reasonable biodiversity enhancement measures to be provided should be outlined within a Biodiversity Enhancement Layout and should be secured by a condition of any consent. It is recommended that this could also include provision of integrated bat and bird boxes.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

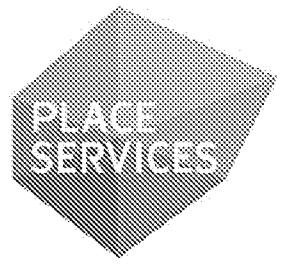
Impacts will be minimised such that the proposal is acceptable, subject to the conditions below based on BS42020:2013.

We recommend that submission for approval and implementation of the details below should be a condition of any planning consent. Should any external night time lighting be required, then a wildlife sensitive lighting design scheme should also be secured by a condition of any consent.

Recommended conditions

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

"All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Bat Roost Assessment (South Downs Ecology, November



2022) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

Reason: To conserve and enhance protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

2. PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT LAYOUT

"A Biodiversity Enhancement Layout, providing the finalised details and locations of the enhancement measures contained within the Preliminary Bat Roost Assessment (South Downs Ecology, November 2022), shall be submitted to and approved in writing by the local planning authority.

The enhancement measures shall be implemented in accordance with the approved details prior to occupation and all features shall be retained in that manner thereafter."

Reason: To enhance protected and Priority species & habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

Please contact me with any queries.

Yours sincerely

Hayley Dean MSc BSc (Hons)

A current Qualifying member of CIEEM
Ecological Consultant



Place Services provide ecological advice on behalf of Arun District Council

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.