

[REDACTED]

From: Simon Davis
Sent: 03 February 2022 13:22
To: 'Lisa Jackson' [REDACTED]
[REDACTED]

Subject: RE: Y/3/22/OUT- Land West Of Bilsham Road, Yapton

Dear Lisa,

Thanks for your email. I have done as you asked re amending the website files. However, in respect of the biodiversity metric, I couldn't see this on our files already and also I can't upload an excel file to our online planning files.

Liz has considered this matter further and provided the attached comments. I agree with this position and so would request that you provide the full Phase 1 habitat surveys and any subsequent surveys as part of this application as previously requested.

I can agree with you on the subject of mitigation for the area subject to Outline - that detailed mitigation measures and management plans can be secured by condition or provided with the Reserved Matters. However, we do need the full extent of the survey information that will inform the mitigation measures.

Kind Regards

Simon J Davis MRTPI
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Directorate of Place
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From: Lisa Jackson [REDACTED]
Sent: 03 February 2022 10:21
To: Simon Davis <Simon.Davis@arun.gov.uk>

Subject: Re: Y/3/22/OUT- Land West Of Bilsham Road, Yapton

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Dear Simon

I refer to the email exchange below between Liz Annalls and William Davis.

Can you please substitute the updated ecology report as part of the planning application record.

I think it is worth emphasising that this is Hybrid planning application with the vast majority of the site being considered as an outline application. It is important to keep this in mind as the details of the majority of the scheme are not fixed by this application. The majority of the limited ecological points of interest on this site are within the outline area. The reserved matters application will need to take account of this and design the scheme accordingly.

The detailed phase 1 and phase 2 surveys have demonstrated that the development proposed can be accommodated on site. The accompanying BNG calculations and detailed spreadsheet (attached here for convenience) confirm the net gain areas for habitat. The suggestion by the officer that "*We Feel*" that bat habitat will be lost on the site is not supported by any evidence. The detailed BNG calculations confirm this.

With regard to the bat data and length of survey time it is important to reiterate that none of the surrounding vegetation is to be removed. Given the site has low suitability for Bats the survey data provided is entirely proportionate.

It is not appropriate to provide a LEMP and CEMP at this stage of the planning process and this can be secured by condition as appropriate. The CEMP needs to relate to the detailed nature of the scheme and this is not yet designed for the outline area. NPPF 55 confirms this approach.

Given the vast areas of habitat gain in the blue land there is more than ample space and suitable habitat for reptile translocation if this is felt to be absolutely necessary, this again would be secured by the LEMP which can be subject to a planning condition given the land is in the direct control of the applicant.

I hope this is helpful in confirming that the surveys, detailed recording and the proposed mitigation are proportionate to the current application stage and that all the necessary controls can be secured at reserved matters stage and through the use of conditions.

Kind regards,
Lisa

Lisa Jackson MA, BSc MRTPI
Jackson Planning Ltd
Fox Barn, Lower Chute,
Andover, Hants, SP11 9DU

On 3 Feb 2022, at 09:20, William Davis [REDACTED] wrote:

Dear Liz,

Thank you for your response. I have itemized our reply below and amended our report where required.

I hope that helps,
William Davis

1. **Full methodology of the surveys and how they were done**, the description in table 3 does not provide enough detail.
 - Survey methodologies are outlined in section 5.
2. **Badger survey** – how was the survey done?, by who?, images of potential badger sett?, how was it monitored? – how regular?, where are the records for this? –
 - Survey methodology is outlined in section 5.14 and 5.15. A photo is provided in Appendix III (photo 3). Monitoring details have been provided in section 5.15. Checks for changes in activity were undertaken during the survey visits for the reptile surveys and bat transects.
3. **Bats** – Who were the surveys done by (we need confirmation of their bat licence, CIEEM membership etc), map of foraging areas, survey period is only a month this isn't long enough, which *Myotis* species were found (were there any *Bechsteins* and *Barbastelles*?), what survey work was done for roosting bats, any tree potential (would be included within a full phase one habitat survey) –
 - Surveyor details are provided in section 5.16. I have amended the report to include my CIEEM membership and licence number though the other ecologists are not members of the CIEEM.
 - No key foraging areas were identified as use by bats is sporadic (recorded occasionally along the boundary features of the site); therefore it was not considered necessary to provide a map as there were no identifiable patterns of behaviour to record.
 - Recording quality was not sufficient to determine *Myotis* to species level. It is generally considered that this genus cannot be determined to species level from bat sound analysis alone. The number of *myotis* passes was low therefore it is not considered to be an important site for this species.
 - I can confirm that no *barbastelle* bats were recorded during bat surveys.
 - The site was assessed as holding low suitability in accordance with BCT therefore seasonal surveys were recommended. The surveys undertaken covers summer and autumn. Whilst this is a deviation from survey guidance justification for this is provided in section 4.10.
 - No suitable potential roosting features within trees were recorded within the development area and no proposals to remove mature trees have been made as far as we are aware. I have amended the report and added paragraph 5.26 to clarify this and details of when this assessment was made.
4. **Birds** – how was the site assessed and when, which bird species were recorded on site and at what level? Location of nesting birds in hedgerows? – which species? –
 - Details are provided in section 5.27 and 5.28. No nests were recorded during the site walkover survey. Targeted breeding bird surveys were not undertaken as the only suitable habitat is hedgerows on site which are being retained.
5. **Great Crested Newts** – was the habitat assessed during the phase one habitat survey-when was this done and by who? –

- Yes, the assessment of the habitats on site was made during the ecological appraisal of the site. I have amended the report to include the details of this and the guidance used within paragraph 5.29.
- 6. Dormouse** – is the site isolated – map evidence of wider landscape to demonstrate this, evidence to show the species of hedgerow are unsuitable for dormice.
- Justification for the isolated nature of the site is provided in section 5.32
- 7. Reptiles** – where were the location of the mats? –
- I have appended a survey map showing the location of the species recorded and the location of reptile refugia used during the survey.
- 8. Habitat** – We need maps of the site showing habits and amount of each type. –
- A map is provided in appendix II. Details on the habitat areas are provided in the BNG metric.
- 9. Bats** – foraging – we feel there would be a loss of habitat within hedgerow and ditch network – this needs to be addressed –
- Can you clarify this please? The existing linear features will be retained. The ditch is outside of the development area and a new hedgerow is proposed alongside it where the edge of the development meets the feature, therefore improving the quality of foraging habitat on site. Access to the site will be obtained through the existing access point therefore there will be no break in these linear features and the current extent of these commuting features will be retained in full. Potential impacts in relation to lighting can be addressed through a detailed lighting strategy which we have discussed in section 7.10.
- 10. Enhancements** – these need to be mapped in more detail and details of how they will be maintained / protected needs to be included – this is usually included within a LEMP or CEMP.
- Both of these plans can be produced if required. I would recommend that as this is an outline application the production of these documents could be conditioned as the LEMP cannot be produced without the final landscape designs. The accompanying BNG report outlines specific target condition for the habitats to be created on site and details of how this will be achieved can be provided within the LEMP.

11. Mitigation

- a. Badgers** – fine (once above information is provided)
 - b. Bats** – more details on lighting and noise restrictions what times during construction – normally included within a CEMP –
- Further details can be provided in a CEMP. Currently we have stipulated that lighting will be limited to daylight hours. This with the expectation that the hours of work will be defined within this document or by the local authority as part of best practice requirements.
- c. Birds** – fine (once above information is provided)
 - d. Reptiles** – we would be looking for translocation (trap and relocate) mitigation. Management of habitat to relocate species is not suitable. We would require full details of this including the creation / management of a translocation site.
- We can recommend a translocation if considered more appropriate however suitable habitat on site is limited to the existing field margins. The population estimate of reptiles is very low and the suitable habitat around the hedgerows will be retained during the construction as the existing hedgerows will be retained and protected during development. I hope the production of the survey map showing the locations of the reptiles will be helpful in demonstrating why we feel that habitat manipulation would be more suitable. If you are concerned about the potential for colonisation during construction we could include a

reptile fence between the unsuitable arable field margin and the development area to exclude reptiles from the construction area that way rather than a translocation?

e. Dormice - no reference made.

- No mitigation required as considered likely absent from the development area.
- f. Great Crested Newts – no reference made
- No mitigation required as considered likely absent from the development are

William Davis
Senior Ecologist