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From: Rufus Knight [REDACTED]

Sent: 06 March 2026 14:25

To: Planning <Planning@arun.gov.uk>

Subject: Representation – Objection: Application Y/80/25/S73 - Land west of Bilsham Road, Yapton

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Planning Application: Y/80/25/S73 – Land West of Bilsham Road, Yapton

My name is Rufus Knight. I am 18 years old and have lived on Bilsham Road opposite this field for my entire life. Growing up here in a rural village has given me a strong interest in wildlife and ecology. The

field opposite my home is one of the places where that interest began. Over many years I have observed the seasonal patterns of wildlife there, including birds, mammals and other species that use the open grassland and hedgerows.

As someone from a younger generation, I have been encouraged to care about biodiversity and the natural environment. We are often told that protecting wildlife will increasingly be the responsibility of my generation. However, that responsibility depends on current planning decisions ensuring that ecological safeguards and environmental guidance are properly applied today. Young people like me rely on planning authorities, developers and ecological professionals to ensure that the protections that exist for wildlife are implemented carefully and in practice.

For this reason I would like to raise concerns about the ecological assessment and implementation associated with application **Y/80/25/S73 (Land West of Bilsham Road, Yapton)**.

Government guidance on reviewing planning applications affecting protected species makes clear that planning authorities should have sufficient ecological information available before determining applications and that surveys should be carried out at appropriate times of year when species are most detectable. In this case, the ecological walkover survey forming the basis of the updated Ecological Impact Assessment was undertaken in October, with the report issued in November. While such surveys may be suitable for identifying general habitats, they are undertaken outside the breeding season when ground-nesting farmland birds such as skylarks are most easily detected.

During the past week skylarks have been heard almost constantly displaying over the field. Multiple birds can be observed singing high above the grassland and descending back into the vegetation, behaviour which is strongly associated with breeding territories. Skylark (*Alauda arvensis*) is a UK Red List species of conservation concern and nests directly on the ground in open grassland and farmland habitats. I have video and photographic evidence of this activity, as well as evidence of works currently taking place within the field at the same time.

At present contractors and machinery are moving around the field while these birds appear to be actively displaying and potentially nesting. Under the Wildlife and Countryside Act 1981 it is an offence to intentionally or recklessly damage or destroy the nest of any wild bird while that nest is in use or being built. The Ecological Impact Assessment recognises that breeding birds may be present and recommends checks prior to vegetation clearance during the nesting season. However, from what can currently be observed it is almost certain these safeguards are not being implemented consistently on site while works are underway.

Given that works are currently underway during what appears to be the early breeding season for ground-nesting birds, it would be reassuring to understand what ecological supervision or pre-works nesting bird checks have been undertaken in accordance with the mitigation measures set out in the Ecological Impact Assessment.

In reviewing the planning documents, the ecological consultation response provided by the council appears to focus primarily on additional mitigation relating to bats. There does not appear to be any detailed consideration of breeding birds or ground-nesting farmland species within that response. Given that skylarks are a UK Red List species and that multiple birds are currently displaying over the site, it may be helpful to review whether the ecological information available at the time of the consultation fully reflected the potential presence of breeding farmland birds on the site.

Beyond the currently observed skylark activity, the field supports a wide range of wildlife throughout the year. These observations are supported by local bird survey records and photographic / video evidence collected by residents over several years. Large flocks of starlings regularly feed within the

field during autumn and winter, swallows gather over the grassland during late summer prior to migration across the Channel, and groups of stonechats are consistently present along the rough grass margins during the winter months. White storks associated with the Knepp reintroduction project have also been recorded using the field as a temporary feeding or staging area when moving through the wider landscape.

In addition, kestrels and other raptors are frequently observed hunting over the field, behaviour which typically indicates the presence of healthy small mammal populations within rough grassland habitats. Other wildlife regularly observed using the field includes deer and foxes. Taken together, these observations suggest that the site functions as an active and seasonally important habitat for a variety of farmland and grassland species.

This appears difficult to reconcile with the conclusion in the Ecological Impact Assessment that the grassland is described as “common and widespread, and overall of low ecological importance.” Direct observations made on site suggest that the ecological baseline used in the assessment may underestimate the functional value of the field as farmland bird and grassland habitat, particularly in the context of the continuing loss of such habitats locally in the Yapton and Ford area.

The assessment itself also acknowledges skylark activity in the surrounding fields but concludes that the likelihood of other species of conservation importance being present is negligible due to the limited extent of semi-natural vegetation. However, skylarks themselves are a Red List farmland bird species and are well known to breed in open farmland and rough grassland habitats similar to those present on the site. The presence of displaying skylarks therefore suggests that the habitat may have greater ecological value for farmland birds than the assessment indicates.

The observations currently being made on site therefore raise a reasonable question as to whether the ecological baseline used in the assessment fully reflects the ecological function of the field during the breeding season. The direct evidence available, including photographs and video recordings, strongly indicates that the field is currently supporting active wildlife use that may not have been apparent during surveys undertaken outside the breeding period.

Finally, I understand that this application has been submitted under Section 73, which allows variations to conditions of an existing planning permission. While this is a legitimate planning mechanism, it also means that the development is not being assessed against more recent biodiversity policy requirements, including the mandatory Biodiversity Net Gain provisions that now apply to new planning permissions. The ecological baseline used for the development is therefore based on earlier survey work rather than the current ecological condition of the site.

Where new evidence suggests that the ecological value of a site may be greater than previously assessed, it seems reasonable that this should be carefully considered before works progress further. As someone who has grown up directly opposite this field and who has observed its wildlife over many years, I believe it is important that its ecological role within the local landscape is properly understood before it is altered.

I would therefore respectfully ask that the ecological situation on site, particularly with regard to breeding birds and the implementation of the mitigation measures described within the Ecological Impact Assessment, is reviewed to ensure that protected wildlife and nesting birds are not inadvertently compromised.

Where there is reasonable evidence that protected or Red List species may be actively using a site during the breeding season, it is essential that the planning authority is satisfied that adequate ecological information and appropriate safeguards are in place before further works proceed.