

Local Planning Policy

- 2.16 Local planning policies of relevance to the Site, ecology, biodiversity and/or nature conservation within the Adur Local Plan (2017) has been set out in Table 1 in Appendix H, and comprise the following:

Adur Local Plan (2017)

- Policy 6: Land at West Sompting
- Policy 10: Sompting
- Policy 30: Green Infrastructure
- Policy 31: Biodiversity

3.0 AIMS AND OBJECTIVES

Overview

- 3.1 The potential impacts of both the construction and operational phases of the proposed development have been assessed in detail within the Ecological Impact Assessment (CSA/2134/04/C).
- 3.2 In line with national and local planning policy, this strategy aims to minimise adverse effects on notable/protected habitats and species during the Site clearance, construction, and operation phases of development. To meet this aim, objectives have been set out for each of the IEFs of relevance to the Site below.

Habitats and Flora

Aim

- 3.3 The Strategy aims to, where possible retain, protect and reinstate semi-natural habitat resources (with a focus on S41 habitats in respect of the NERC Act 2006) across the Site.

Objectives

- **Retain and protect ecologically valuable habitats**, wherever possible within the constraints of the proposed scheme.
- **Enhance and create new semi-natural habitats**, through appropriate management of habitats (grassland, hedgerows, native trees, scrub and woodland).

Fauna

Aim

- 3.4 This strategy will aim to avoid or minimise adverse effects on protected/notable species, or where this is not possible provide suitable mitigation, and finally compensate for adverse effects if they cannot be avoided.

Objectives

- **Retain and protect habitat** which is suitable to support protected/notable species on-Site, where possible.
- Where habitat is lost as a result of development **seek to avoid potential direct impacts to wildlife/protected species** (e.g. killing/injury/disturbance) through sensitive working practices, timing of works and mitigation provision (e.g. new habitat creation and enhancement) to ensure that the favourable conservation status of local wildlife populations is maintained.
- **Ensure that mitigation is legally compliant** and subject to Natural England licencing as appropriate.

4.0 IMPACT AVOIDANCE AND MITIGATION MEASURES

Habitats and Flora

Trees

- 4.1 The proposals have been carefully designed to avoid impacts to broadleaved woodland where possible and no woodland is to be lost. Some tree removal has occurred to facilitate development, specifically the removal of a treeline alongside Dankton Lane near to the eastern boundary of Phase 2.
- 4.2 To prevent accidental damage of retained vegetation during construction, works will be undertaken in-line with BS5837:2012 "Trees in relation to design, demolition and construction. Recommendations." The Root Protection Areas (RPAs) of retained trees and hedgerows will be respected during the preparation of detailed designs and subsequent construction works.
- 4.3 New tree planting is to be provided across the Site, particularly within POS areas. This will help to create a commuting resource for bats. A range of native species including English oak *Quercus robur*, field maple *Acer campestre* hazel *Corylus avellana*, hawthorn *Crataegus monogyna*, spindle *Euonymus europaeus*, blackthorn *Prunus spinosa* and crab apple *Malus sylvestris*, will be planted, in addition to other ornamental tree varieties within the community orchard area (Landscape Strategy in Appendix G). New tree planting will be undertaken during the winter months (November to February) during a period free from frost and will be secured and protected through the use of stakes and guards. Scrubs and weeds will be controlled to prevent competition with newly planted trees. Newly planted trees will require watering regularly in the first weeks after planting.
- 4.4 In addition to this any standing deadwood/monoliths following tree surgery works will be retained in order to provide resources for bats/birds and invertebrates. Felled timber will be used to create log piles, although it should be noted this did not occur with the majority of timber felled for road-widening along the eastern edge of Phase as the timber was diseased. However, a small log pile was created when stag beetle *Lucanus cervus* larvae were discovered during clearance. The location of this log pile is provided at Appendix D.

Hedgerows/Scrub

- 4.5 The development will result in minor loss of patches of scrub and hedgerow habitat.
- 4.6 Loss of hedgerow and scrub will in part be mitigated by the creation and management of existing hedgerow in order to create a functional hedgerow network. New hedgerow planting will use a mix of at least six

native species in order to create 'species rich' hedgerows. Native species will include hawthorn, hazel, blackthorn and crab apple.

- 4.7 To prevent accidental damage of retained vegetation during construction, works will be undertaken in-line with BS5837:2012 "Trees in relation to design, demolition and construction. Recommendations." The Root Protection Areas (RPAs) of retained trees and hedgerows will be respected during the preparation of detailed designs and subsequent construction works.

Arable Fields

- 4.8 The entirety of the arable habitat in fields F6, F7, F8 and F9 will be lost to development. The land change from arable land to housing development and POS is likely to have a residual adverse effect that cannot be easily mitigated, particularly in relation to farmland birds such as skylark and corn bunting. However, this is likely to be offset by the enhancements and future management proposed to the adjacent LWS which will provide enhanced opportunities for other bird species, including wetland birds.

Grassland

- 4.9 There will be significant loss of improved grassland within Field F2, to facilitate the proposal within Phase 2 of development. Improved grassland is not very floristically diverse. However, this loss will be compensated for through the creation of new amenity grassland areas within POS within all Phases, particularly as Phases 1 and 3 will be constructed where arable farmland currently exists.
- 4.10 There will also be some loss of more florally diverse semi-improved grassland from arable field margins in Phases 1 and 3. In order to mitigate for this retained grassland will be seeded with a native grassland mix to promote floral diversity. Appropriate management techniques will be employed in order to encourage the development of a dense swards.

Fauna

Bats

- 4.11 There will be a major loss of improved grassland currently used for hay cutting and grazing, arable fields and associated semi-improved margins to facilitate residential development and associate POS. However, many of the hedgerow features will be retained and buffered during construction by fencing and post construction by POS within land to the south of West Street and community facilities within land north of West Street and land to the east. A significant amount of new planting in the form of hedgerows, trees and a community orchard will be created, which will support invertebrate prey species and allow habitat connectivity for commuting/foraging bats.

- 4.12 Surveys undertaken in 2014 concluded that seven trees had moderate bat roost potential, although none of these trees exhibited significant opportunities for bat roosting. Two trees were assessed as having high bat roost potential although no evidence of bats was found during subsequent aerial inspections.
- 4.13 A ground-based tree assessment was undertaken in May 2014 for evidence of bat activity and Potential Roosting Features (PRFs). This was in-line with the current best-practice guidelines at the time. In summary, seven trees had 'moderate' bat roost potential although none of these trees exhibited significant opportunities for bat roosting. Two trees were assessed to have 'high' bat roost potential although no evidence of bats was found during subsequent aerial inspections. Due to the time that has elapsed since these earlier surveys, trees with bat roost potential will be subject to the appropriate level of update survey work (ground-level tree assessments and subsequent dusk emergence surveys and/or climbing inspections, if required) prior to any removal work, in line with the Bat Conservation Trust Good Practice Guidelines (2023).
- 4.14 A sensitive lighting design will be required such that minimal light spill falls into the woodland or commuting hedgerows.

Badger

- 4.15 No badger setts were noted within land designated for Phases 1 or 2 of the development, however there was evidence of badgers using the Site through the presence of latrines.
- 4.16 Phase 3 of the development contains an active main badger sett on its eastern boundary, identified as Sett A in the associated Badger Mitigation Strategy (CSA/2134/22), along with four outlier setts (Setts B – E). If found to be active, the outlier badger setts within Phase 3, may need to be closed under licence from Natural England where they are to be directly impacted by the development. The main badger sett and retained outlier setts will require a minimum 20m buffer from development. This buffer is to be marked out by Heras fencing during construction to avoid any damage to the setts.
- 4.17 Construction-phase precautionary impact avoidance measures are detailed within the CEMP for each Phase and include measures such as fencing off any open excavations if left overnight or allowing a means of escape (e.g. ramps). The 30m buffer will be marked out by Heras fencing during construction to avoid any damage to the setts and to prevent any badgers from entering the construction site.
- 4.18 Due to the presence of badgers within the local landscape and across the Site, a Site-wide update badger survey should be undertaken prior to the commencement of development in each Phase in order to identify any new signs of badger activity or sett creation. This will be required to inform any badger sett closure licence application from

Natural England, which will be informed by a Badger Mitigation Strategy, and will ensure that legal obligations are met.

- 4.19 Retained hedges, scrub and grassland will continue to provide viable dispersal corridors for badgers.

Birds

- 4.20 Development of the Site will result in the loss of large areas of arable habitat which may impact species such as corn bunting and skylark. Small areas of scrub and hedgerow which are suitable for nesting birds will also be lost. The loss of these habitats may also impact local farmland bird populations by reducing breeding and foraging habitats. Given the conservation importance of these species, in the absence of mitigation, it is expected that this loss of breeding habitat will result in significant negative effects.
- 4.21 Increased predation during the operational phase of the development may be likely due to a possible increase in the number of house cats in the area. The minor loss of arboreal nesting and foraging resources resulting from the proposed clearance of small sections of hedgerow and mature trees will be compensated by new habitat creation.
- 4.22 Whilst like-for-like farmland opportunities cannot be replicated on-Site, the provision of a diverse alternative foraging resource adjacent to retained arable land to the south is anticipated to reduce the effect of on-Site habitat loss for a small number of corn bunting and skylark, by providing opportunities for local individuals of these species.
- 4.23 The removal of suitable nesting habitat including arable land, as well as future management within retained areas of suitable nesting habitat will ideally be undertaken outside of the main bird nesting season, taken to run from mid-March to August inclusive. This will prevent destruction and disturbance to nests of both early nesting species, and those which continue to breed into August, including song thrush. These timeframes will also be applicable to clearance of habitat within proposed construction zones. Where this is not possible a nesting bird check by a suitably qualified ecologist of the areas due to be cleared should be conducted in order to identify any active nests and to identify any exclusion zones, prior to works taking place. Exclusion zones will remain in place until the birds have fledged.
- 4.24 The above measures will ensure compliance with the Wildlife and Countryside Act 1981 (as amended), which affords all wild birds' nests protection from destruction whilst in use; with those species listed on Schedule 1 also being afforded protection from disturbance.

Reptiles

- 4.25 A reptile trapping and translocation exercise has been undertaken on-Site between August-October 2021 in Phase 1, May-September 2022 in

all three Phases and alongside Dankton Lane adjacent to Phase 2 in August – September 2023 to reduce the risk of killing/injury during the construction phase. Reptiles have been moved to the LWS in accordance with the Reptile Mitigation Strategy (CSA/2134/07).

- 4.26 The translocation consisted of a total of 114 trapping days for Phase 1 across 2021/22, and 75 days in Phases 2 across 2022/23. A total of 60 days of trapping were completed in 2022 for Phase 3. Although a minimum of 90 days were prescribed for Phase 3, the lower numbers caught and capture depletion trends meant that a total of 60 days was appropriate in sufficiently translocating the reptile population from this phase. Table 1 below provides a summary of reptiles captured and translocated across all three phases. A reptile translocation report has been provided to give full methods and results for this work (CSA/2134/09).

Table 1. Summary of results from the reptile translocation in 2021 and 2022 across all three phases.

Phase	Slow worm adult total	Slow worm sub-adult/juvenile total	Grass snake sub-adult/juvenile total
1 (2021)	354	325	4
1 (2022)	60	33	3
2 (2022)	152	257	1
2 (2023)	4	4	0
3 (2022)	135	150	10
Total	705	769	18

- 4.27 Capture efforts were augmented through phased habitat clearance during the translocation, through the use of hand-held tools including trimmers/brushcutters under close supervision and an Ecological Clerk of Works (ECoW). This aided encouragement of reptiles that were present to disperse where they could be captured and relocated to the receptor areas within the LWS.
- 4.28 Reptile exclusion fencing has been installed and should be protected from the construction zone using Heras fencing where appropriate; and checked on a regular basis during the construction period for any signs of damage which could reduce the effectiveness of the exclusion barrier. Once construction is complete, exclusion fencing may be removed (during the reptile active season) and final landscaping and path creation be completed.
- 4.29 A detailed mitigation strategy is provided in the Reptile Mitigation Strategy (CSA/2134/07/E), and reptile mitigation work completed is provided in the Reptile Translocation Report (CSA/2134/09). These reports can be provided if requested.
- 4.30 On-Site mitigation has been proposed for land to the north of West Street (Phase 2 of the development), with any reptiles to be relocated to the proposed community orchard area.

Invertebrates

- 4.31 New SuDS creation, native grassland seeding, and tree planting will provide new breeding and foraging opportunities for a wide range of invertebrate species to mitigate for any loss of habitat.
- 4.32 Key habitats that offer opportunities/resources for important invertebrate species, such as hedgerows and grassland are retained where possible.

5.0 ENHANCEMENT MEASURES

Aims and Objectives

- 5.1 Enhancement measures for protected species and IEFs, relevant to the construction and operation phases of development, are set out herein to address the following aims and objectives:
- Undertake habitat creation which will be in line with national and local planning policy;
 - Provision of habitat enhancement features of benefit to fauna known to be present onsite / locally;
 - Provide long-term benefits for wildlife during the operational phases through suitable habitat provision and management;

Enhancement Measures

Habitat Creation and Enhancement

- 5.2 Inclusion of plant species of known wildlife value within the landscaping scheme, including locally appropriate tree, shrub and grassland species (see Landscape Strategy Plan in appendix G). Specific recommendations in regards to protected and notable species are discussed below under the relevant headings.

Bats

- 5.3 At least 10 no. bat boxes will be incorporated into the fabric of new builds (Habibat tube or equivalent) and 10 no. bat boxes will be erected on retained trees and woodland (Schwegler 2FN or equivalent) across the entire development.
- Three of these will be incorporated into buildings within Phase 1 of the development.
 - Four will be incorporated into buildings within Phase 2 and an additional five bat boxes will be erected on mature trees within Phase 2.
 - Three will be incorporated into buildings within Phase 3 and an additional x5 bat boxes will be erected on mature trees within Phase 3.
- 5.4 The approximate locations of these boxes are shown on the Phase 1 Ecological Mitigation and Enhancement Plan (CSA/2134/145/C), the Phase 2 Ecological Mitigation and Enhancement Plan (CSA/2134/158) and the Phase 3 Ecological Mitigation and Enhancement Plan (CSA/2134/318) respectively.
- 5.5 Bat boxes will be placed at least 4m from the ground with at least one box per tree sited with the front facing SW to SE. Boxes will be placed

with different aspects, providing a choice of roost sites with different environmental conditions.

Badgers

- 5.6 New areas of native grassland planting and maintenance of existing grassland will provide new foraging opportunities for badger across areas of POS.

Birds

General

- 5.7 A total of at least 15 bird nesting boxes will be provided across all phases on new builds as follows:
- 5x generic bird boxes (Aviannex or equivalent)
 - 5x swift/sparrow bricks (S Brick or equivalent)
 - 5 x house martin / swallow cups (Schwegler or equivalent)
- 5.8 Of these 15 bird nesting boxes, Phases 1 and 2 of the development will each incorporate:
- 1 x generic bird box
 - 2 x swift/sparrow bricks
 - 2 x house martin / swallow cups
- 5.9 In addition, to provide some mitigation for the loss of potential nesting opportunities, a selection of bird boxes will be provided within retained woodland areas in Phase 2, with 8 x boxes being provided within retained woodland/trees. These boxes will include species-targeted nest boxes, including 2 x treecreeper boxes, 2 x stock dove/tawny owl boxes, 2 x starling boxes and 2 x robin/open boxes.
- 5.10 Indicative locations and specifications for box provision within Phases 1, 2 and 3 of the development are shown on the Phase 1 Ecological Mitigation and Enhancement Plan (CSA/2134/145/C) and Phase 2 Ecological Mitigation and Enhancement Plan (CSA/2134/158) and Phase 3 Ecological Mitigation and Enhancement Plan (CSA/2134/318), respectively. These boxes should be located in areas where natural nesting opportunities, such as crevices and holes, within retained or newly planted trees are scarce or absent, allowing wider dispersal and reducing territorial competition between and within species (Blakesley and Buckley, 2010).
- 5.11 New tree and hedgerow planting shall consist mainly of native species beneficial to birds, which will provide greater foraging, sheltering and nesting opportunities for birds utilising the Site. House martin cups are to be installed at a distance to sparrow bricks in order to minimise competition.