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The Clerk to the Parish Council
Aldingbourne Parish Council
c/o Red House
100 Middleton Road
Middleton-on-Sea
West Sussex

15th July 2016

Our Ref: AG/15070
Your Ref:

By e-mail only

Dear Sir / Madam,

REPRESENTATIONS TO THE ALDINGBOURNE SUBMISSION NEIGHBOURHOOD DEVELOPMENT PLAN (2016 - 2036) REGULATION 15 PUBLIC CONSULTATION

We write on behalf of our client, CALA Homes (Southern Home Counties) Ltd, who have an interest in the land to the east of Westergate, as shown in Figure 1 below. The content of this letter comprises our client's formal response to the Aldingbourne Submission Neighbourhood Development Plan 2016 - 2036 (referred to in this letter as 'Reg 15 ANP 2016'), which is currently subject to public consultation under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012. Appended to this letter are our Regulation 14 comments, the Assessment of Value of Site as a Biodiversity Corridor (ECOSA, March 2016) and an Ecological Constraints and Opportunities Plan which should be read in combination with this letter.

Our client's land falls within the Reg 15 ANP 2016 area and forms part of the proposed Barnham / Eastergate / Westergate (BEW) Strategic Allocation for 2000+ houses, community infrastructure and A29 realignment under Policy H SP1 of the Submission Draft Arun District Local Plan 2011 - 2031 (ADLP). The site is an important part of the wider draft Strategic Allocation and provides the east-west connection between the existing A29 and Barnham Railway Station, as required by Policy H SP1.

CALA Homes (Southern Home Counties) Ltd, as part of the BEW Landowner Consortium, previously made representations to the Submission Draft ANP (2011-2034) in August 2015, which were consistent with the subsequent recommendations of the Independent Examination Report, dated October 2015, which found the ANP deficient and unable to be 'Made'. The ANP Examiner found that insufficient evidence had been put forward to support the key proposals and there were unrealistic expectations to restrict housing to meet only local needs. Furthermore the Examiner was not satisfied the allocations relating to education, housing and employment were based on sufficiently robust evidence to ensure the draft Plan had adequate regard to national guidance or the strategic aims of the

emerging Development Plan. As such the ANP failed to meet the basic conditions, as set out within National Planning Practice Guidance (NPPG).

Further representations were made by CALA Homes (Southern Home Counties) Ltd in March 2016 on the revised Pre-Submission Reg 14 ANP in March 2016. It was considered the Pre-Submission Reg 14 ANP had not adequately responded to the Examiner's recommendations and remained inconsistent with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) for the following reasons:

- The Neighbourhood Plan was absent and silent in respect of up to date housing needs evidence for Arun District.
- The proposed biodiversity corridor designation under policy EH2 was not considered to be based on credible or robust evidence.
- Policy EH3 regarding development on agricultural land was not considered consistent with the NPPF and PPG.

Having now reviewed the Regulation 15 Submission Plan, it would appear the revisions have gone some way towards incorporating our previous objections at the Regulation 14 stage. However, we maintain our objections in relation to the wording and extent of the biodiversity corridor and therefore consider the draft Neighbourhood Plan remains inconsistent with the NPPF and PPG for the reasons set out below.

***Figure 1**: Cala Group land*

a) Policy EH2 Green Infrastructure and Ecosystem Services

Policy EH2 has been revised to read as follows:

'New development within, or immediately adjacent to the Biodiversity Corridors identified on Map A will only be supported where it can be clearly demonstrated that development proposals will not give rise to any significant harm to the integrity or function of the Biodiversity Corridors.'

Following our previous representations at the Reg 14 stage we are disappointed to see the extent of the biodiversity corridor, identified on Map A, has not been revised to remove the arable fields or improved grasslands. This land has been identified for housing under Policy H SP1 of the Submission Draft Arun Local Plan 2011-2031 and is likely to remain so, in view of the site featuring in every growth option being tested by the District Council through the Sustainability Appraisal of the Proposed Modifications to the Local Plan. Evidence was previously provided in the form of the *Assessment of the site as a Biodiversity Corridor (ECOSA Ltd March 2016*) which concluded that the development of the existing fields is not anticipated to have a significant adverse impact on local ecology, subject to protection and enhancement of retained boundary features. Under Policy H SP1, the masterplanning of this strategic housing allocation would be required to incorporate generous green spaces linked to the wider countryside and it is expected any planning application would need to deliver biodiversity enhancements, including those associated with the provision of new green infrastructure.

It is not the principle of a biodiversity corridor designation that is at fault within the Reg 15 ANP 2016. Biodiversity Corridors are recognised as enabling species to move between core areas[1]. These can be made up of a number of small sites acting as stepping stones or a mosaic of habitats that allow species to move and support ecosystem functions. The Reg 15 ANP 2016 states that *'The parish of Aldingbourne has a number of small copses, old orchards, mature hedgerows, ponds, watercourses and similar habitats hosting a variety of wildlife. These have potential to enhance biodiversity within the parish and provide important connections between the South Downs and the coast, if they are better connected to form wildlife corridors.'*

Hedgerows and streams are mentioned in the Reg 15 ANP 2016 as key linear features *'large sections of old hedgerow surviving within the parish which retain valuable mature trees along with a mix of shrub and herbs species. These linear sites, provide a valuable landscape feature and a refuge for a range of plant and animal species as well as acting as important wildlife corridors.'*

Policy EH1.4 of the Reg 15 ANP 2016 states *'The parish has a number of chalk streams, including the Eastergate Stream and Eastergate Rife which feed into the Lidsey Rife, the Westergate Stream and Streams West of Westergate to the Stream forming the boundary with Tangmere Parish which feed into the Aldingbourne Rife. These watercourses are protected by EU Habitat Regulations and national legislation and a number have been identified by the Sussex Wildlife Trust as in need of protection and enhancement to restore their biodiversity. The creation of green infrastructure corridors along these streams will therefore be a priority.'*

[1] As set out within 2.12 of the Natural Environment White Paper

The purpose of a biodiversity corridor is to provide a link to enable species to move between core areas, such as between the South Downs and the South Coast. The key linear feature which could be seen as a biodiversity corridor on the site is the Rife along the eastern boundary and the stream that runs east west through the site. This stream links to the South Downs to the north and to the coast to the south. The site also supports a number of mature hedgerows with mature trees, which also form good linear habitats providing a corridor from the north to the south of the site. Some of these existing hedgerows are gappy and would benefit from infill planting to provide better habitat corridors. The areas of grassland on the site are species poor and have been subject to agricultural improvement in the past and are of low ecological value. The large arable field to the south of the site, which is also included as part of the green corridor, is intensively managed and of low ecological value.

Ongoing ecological surveys have confirmed that where notable or protected species have been recorded, these are associated with the linear features such as the hedgerows and the chalk stream, rather than the open fields. For example breeding birds such as Cetti's warbler which is associated with the linear belt of woodland in the west of the site, reptiles associated with rough grassland along hedgerows and foraging bats associated with the hedgerows and along the chalk stream. Bats in particular are using these features as corridors to cross the site, rather than crossing the open fields. The field margins around the hedgerows and along the chalk stream are part of these linear corridors, but the large areas of arable and semi-improved species poor grassland are not considered to be an important part of these linear corridors. It is therefore considered there is no robust evidence to support the designation of the open fields within the site as a biodiversity corridor.

Paragraph 40 of the PPG on Neighbourhood Planning advises on what evidence is needed to support a Neighbourhood Plan and states,

'While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. ***Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.' [our emphasis]***

The ecological evidence base supporting the Reg 15 ANP 2016 comprises a Desktop Biodiversity Report (Sussex Biodiversity Record Centre, 27th September 20-13) and Habitat Map and a Biodiversity Corridor Justification (BCJ) prepared by Mr Beaton, Chairman of the Aldingbourne Parish Council. It is common ground that the Rife Valley and Chalk Stream crossing the site are important habitats and should be safeguarded as linear wildlife corridor serving the local ecological network. However, notably, the Biodiversity Report does not identify the arable fields and grasslands as important habitats, nor does the more detailed site survey work undertaken by ECOSA as part of the appended report. Therefore the proposed inclusion of the arable fields and grasslands within the biodiversity corridor is not supported by proportionate and robust evidence to justify the inclusion of these areas within the designation.

The comments within the BCJ report are based on the ECOSA 2012 surveys, the results of which are now largely obsolete and in need of updating (currently being carried out by ECOSA over the 2016 survey season). New guidance for carrying out ecological surveys, such as those detailed within CIEEM guidance, will be followed to ensure a robust record of the baseline conditions of the site are recorded.

The design of the development takes into account the findings of the 2012 ECOSA surveys but, to ensure an iterative process and in line with EIA guidance, the design of the proposed development of the site will also take account of the updated ecological surveys being undertaken over the 2016 survey season.

Certain areas of the site, highlighted by ECOSA's studies, as being of value in terms of their function as a Biodiversity Corridor but also in terms of the species they support, are being avoided (such as hedgerows, the chalk stream and area of wet woodland). As such, the design of the scheme will ensure no overall net loss of habitats on site and ensure the continuation of green corridor functions and in particular the chalk stream corridor (both north-south and also west-east). The design of the scheme will, for example, avoid any breaches of hedgerows wherever possible to ensure a retention of connectivity across the site.

An extended Phase 1 habitat survey of the site and its boundaries, together with a suite of Phase 2 surveys are being undertaken this season (2016). These comprise targeted protected species surveys, invertebrate, breeding bird and botanical surveys.
The results of these surveys will be written into a detailed and concise Ecological Impact Assessment (EcIA) which will clearly assess the impacts associated with the proposed development of the site and take account of the features on site, both in terms of their function as a wildlife corridor and also in terms of their value based on the botanical species diversity/faunal species they support. Acknowledgement will be given to the intrinsic and amenity value of the site and identify "biodiversity gains" and include a section on "Ecosystem Services" (in line with current CIEEM guidance). All opportunities for enhancement of retained habitats will be realised and incorporated into the development's design. As part of the EcIA process, statutory environmental body consultation, as well as public, will be obtained and taken into account as part of the development's design.

Forming part of the submission of the planning application will be an ecological management plan. This will include the areas of the site which are being retained and fall outside of the development areas; the overall aim of the plan will be to increase the value of the retained habitats on site to improve their condition; the plan will draw on the UK BAP targets and guidance provided in the Biodiversity 2020 document.

The extent of the Biodiversity/Green Corridor encloses areas of land which have been assessed during our extended Phase 1 habitat surveys of both 2012 and 2016 as being of limited value in terms of both their function as a wildlife corridor and also in terms of the species they support.

The BCJ report provides a good information source which will be used as a reference (subject to the agreement of the author) for the compilation of the EcIA and development of the proposals for the site.

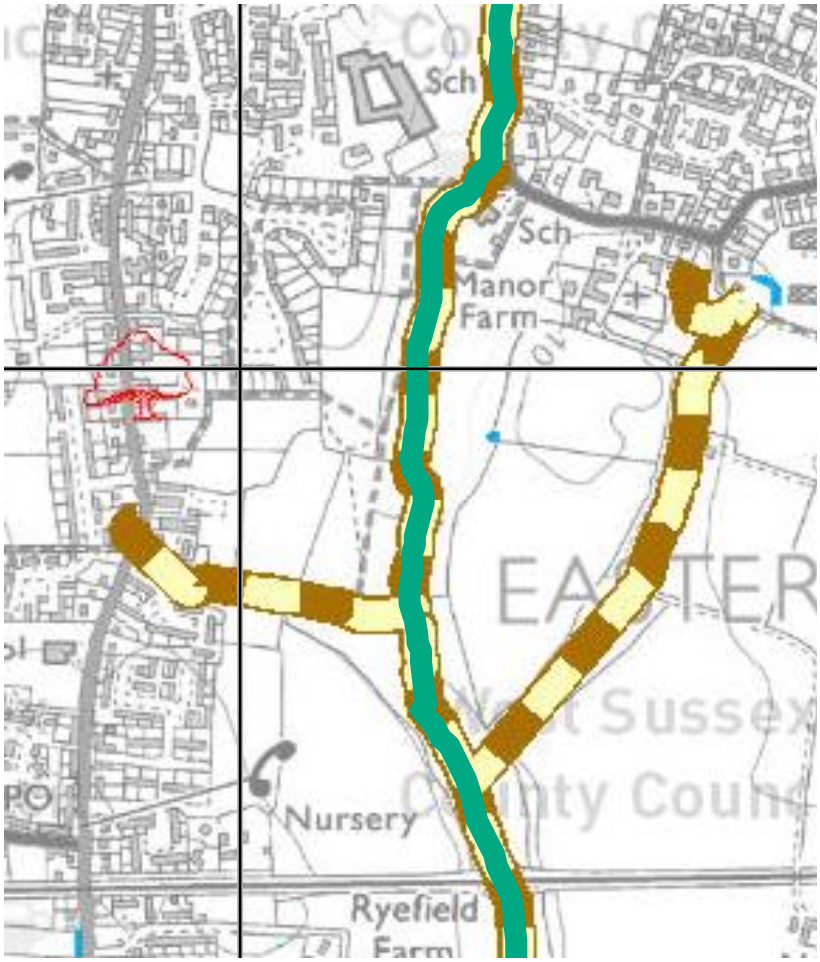

***Figure 2**:* Extract from Habitat Map (ESD/13/509)

Paragraph 40 of the NPPG goes on to state that Neighbourhood Plan policies 'relevant' to housing supply should take account of the latest and up-to-date evidence of housing need,

'Neighbourhood Plans are not obliged to contain policies addressing all types of development. However, where they do contain policies ***relevant to housing supply****, these policies should take account of latest and up-to-date evidence of housing need. In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making.'* ***[our emphasis]***

A recent court of appeal decision found that 'relevant' housing policies are not just those that deal with the delivery and distribution of housing, but also those which restrict where new housing can be built. The case of *Richborough Estates Partnerships LLP v Cheshire East Borough Council* held,

"33. Our interpretation of the policy does not confine the concept of "policies for the supply of housing" merely to policies in the development plan that provide positively for the delivery of new housing in terms of numbers and distribution or the allocation of sites. ***It recognizes that the concept extends to plan policies whose effect is to influence the supply of housing land by restricting the locations where new housing may be developed – including, for example, policies for the Green Belt, policies for the general protection of the countryside, policies for conserving the landscape of Areas of Outstanding***

Natural Beauty and National Parks, policies for the conservation of wildlife or cultural heritage, and various policies whose purpose is to protect the local environment in one way or another by preventing or limiting development. *It reflects the reality that policies may serve to form the supply of housing land either by creating it or by constraining it – that policies of both kinds make the supply what it is."* ***[our emphasis]***

Therefore if an ecological designation such as a biodiversity corridor is a 'relevant' housing policy, *as the Courts have held, then it needs to be considered against* P*aragraph 40 of the NPPG on Neighbourhood Planning and should take into* account the *up to date housing need evidence.*

Section 2.2.4 of the Reg 15 ANP 2016 *references the latest up to date* information *on housing need*, that *being* an *OAN figure of 845 dwellings per annum*, *and* accepts it may be necessary to *accommodate part of the draft strategic housing allocation for 2,000+ dwellings. Given the* Reg 15 *ANP* 2016 *acknowledges this up to date housing needs evidence and* the St*rategic* Al*location,* there is a clear *contradict*ion in the *constraint* imposed *by* the biodiversity corridor *designat*ion on the fields within the site, which are shown in Appendix 2 of this letter to have limited habitat value*.*

The extent of the biodiversity corridor should be revised in line with the ecological constraints and opportunities plan dated June 2016 by ECOSA, attached as Appendix C, which identifies areas of comparative ecological value and areas for ecological enhancement. The appended plan accords with the Habitat Map (ESD/13/509) and shows the field boundaries, chalk stream, Rife valley and wet woodland as habitats to be retained. These safeguarded areas would act as linear corridors habitats for the migration of wildlife.

b) Housing Land Supply

We welcome the amendments to Section 2.2.4 to include reference to the latest up to date evidence on housing need for the District. Reference to the latest OAN figure of 845 dwellings per annum, as concluded at the Examination of the Arun Local Plan. This accords with National Planning Practice Guidance on Neighbourhood Planning at paragraph 009 which states:

'Although a draft Neighbourhood Plan or Order is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, ***up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.[our emphasis]***

Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- *the emerging Neighbourhood Plan*
- *the emerging Local Plan*
- *the adopted development plan with appropriate regard to national policy and guidance.'*

c) Policy EH3 Agricultural Land

The amended wording to Policy EH3 is now considered to accord with Paragraph 112 of the NPPF which indicates:

"Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality."

However it is recommended that ***or*** be inserted to prevent proposals having to satisfy both bullet points, as shown below. This would allow for the development of agricultural land for uses other those which support the diversification of an agricultural enterprise or other land-based rural business, where the need for the development outweighs the harm. As such the policy should be revised to read as follows:

'Proposals for development on the 'best and most versatile' agricultural land shown on Map B, the latest available Defra Agricultural Land Classification Map, will be resisted unless it can be demonstrated that it would meet the following criteria:

- *It supports the diversification of an agricultural enterprise or other land-based rural business;* ***or***
- *The need for the development clearly outweighs the harm.'*

Conclusion

Neighbourhood Planning is not intended to be a tool to prevent or stymie new development from occurring. Neighbourhood planning is about shaping the development of a local area in a positive manner, which can and should include policies that set out where housing need could be met in the Parish.

Map A (under the provisions of draft Policy EH2) of the Reg 15 ALP 2016 should be revised to remove the biodiversity corridor designation on the arable fields and grasslands, which are not BAP priority habitats, having regard to the *Assessment of the site as a Biodiversity Corridor (ECOSA Ltd March 2016*) and the BEW Strategic Allocation in the ADLP. The inclusion of the arable fields and grasslands within the designation is not supported by proportionate and robust evidence and is therefore contrary to the PPG.

In light of the lack of evidence for inclusion of the arable fields and grasslands within the designation, the extent of the proposed designation is considered an unreasonable and unnecessary constraint on the ability of the Submission Draft Local Plan to plan for the up to date housing needs evidence and meet the OAN through the Strategic Allocation. The biodiversity corridor designation should be confined to the areas of *'Comparative Ecological Value'* illustrated in the Ecological Constraints and Opportunities Map, attached as Appendix C. These areas mainly comprise the land immediately adjacent to the Rife watercourse, retained hedgerows, field margins and unmanaged scrubland in the south-west of the site. Should a planning application be submitted on our client's site for a comprehensive residential development a sustainable development could come forwards in a way that is consistent with Policy EH2, subject to restricting the biodiversity corridors designation to the field margins and watercourse through a revision to Map A.

We would welcome the opportunity to discuss the above with the Parish Council as the ANP is progressed. Furthermore we would welcome the opportunity to provide oral evidence should a public hearing be held as part of the Independent NP Examination.

Yours sincerely

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ECOSA
Ecological Survey & Assessment Limited

LAND AT WESTERGATE, WEST SUSSEX

ASSESSMENT OF VALUE OF SITE AS A BIODIVERSITY CORRIDOR

Final Document

March 2016

Preliminary Ecological Appraisals · NVC·· EcIA ··Management Plans · Protected Species Licensing
Habitats · Badger · Bats · Dormouse · Birds · Reptiles · Amphibians · Invertebrates · Riparian and Aquatic Species

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LAND AT WESTERGATE, WEST SUSSEX

ASSESSMENT OF VALUE OF SITE AS A BIODIVERSITY CORRIDOR

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1.0 INTRODUCTION

1.1 Background

Ecological Survey & Assessment Limited (ECOSA) have been contracted by Cala Group Ltd to provide comment on the allocation of land to the east of Westergate, West Sussex, within the draft Aldingbourne Neighbourhood Plan 2016 – 2036 as a 'Biodiversity Corridor'. The site is approximately centred on National Grid Reference (NGR): SU 941 048.

An Extended Phase 1 ecological survey and desk-based assessment were undertaken by ECOSA during 2011[1], aimed at assessing the suitability of the site and its immediate surrounds to support protected habitats and species. Following this preliminary assessment, a series of Phase 2 surveys were undertaken in 2012[2] to provide a more detailed assessment of the value of the site for species including roosting, commuting and foraging bats, dormouse, badger, water vole, breeding birds and reptiles.

An updating ecological walkover survey was undertaken by ECOSA on 2nd March 2016 to identify any significant changes to the habitats within the site since the original surveys were undertaken in 2011 and 2012. The site has also been subject to an Extended Phase 1 Habitat Survey by WYG[3]

1.2 Aims and Scope of Report

The aim of this report is to provide a summary of the sites potential ecological value and assess whether the whole sites inclusion within the draft Aldingbourne Neighbourhood Plan 2016 – 2036 as a 'Biodiversity Corridor' is reasonable. This report is based on the updating ecological walkover and the previous extended Phase 1 habitat survey and subsequent Phase 2 field surveys, which assessed the presence/possible absence of protected species and important habitats at the site.

1.3 Site Setting

The site is situated within the village of Westergate, West Sussex approximately eight kilometres (km) due east of Chichester city centre. The site is situated to the east of the A29 Westergate Street and is bordered to the south by the Portsmouth to London railway line. The site is bordered to the north and west by residential developments and to the east by open farmland.

[1] Westergate, West Sussex – Phase 1 Ecological Survey, ECOSA Ltd, Draft Report, 26th September 2011

[2] Westergate, West Sussex – Phase 2 Ecological Surveys, ECOSA Ltd, Final Report, 19th December 2012

[3] Westergate, West Sussex - Extended Phase 1 Habitat Survey WYG, April 2015

The site comprises an area of enclosed farmland containing pasture, arable fields, hedgerows, treelines, wet woodland, drainage ditches and a small stream.

1.4 Scheme Details

The proposals for the site entail the construction of residential dwellings and associated infrastructure. The proposed development is for circa 320 dwellings, associated public open space, landscaping, and formation of a new access road onto the A29. Detailed design has not been undertaken. The design will take into consideration the results of the ecological surveys and where possible areas of ecological value will be retained and enhanced.

2.0 SUMMARY OF ECOLOGICAL SURVEY RESULTS

A summary of the habitat and protected species survey results are outlined below. Detailed survey results and methodologies are provided within the original reports[1,2].

2.1 Vegetation Communities

2.1.1 Summary

The vegetation within the site comprises predominantly species poor improved to semi-improved agriculturally-derived grassland and areas of rank herbaceous vegetation. A network of vegetated field boundaries is present, comprising predominantly thorny hedgerows, often gappy in nature, with frequent hedgerow trees. The site contains a small area of willow-dominated damp woodland and a number of isolated mature oak trees.

None of the vegetation communities present within the site are considered to be of particular ecological value and the site comprises a typical area of enclosed countryside containing species-poor agriculturally-derived grassland and associated boundary hedgerows, trees and scrub.

2.1.1 Improved Grassland

The majority of the site comprises a series of improved, species-poor grass leys (**Figure 1**) dominated by agricultural grass species such as ryegrass *Lolium perenne*, timothy *Phleum pratense*, smooth meadow-grass *Poa pratensis*, cock's-foot *Dactylis glomerata* and Yorkshire fog *Holcus lanatus*. Herbaceous species are few within the field interiors and are generally restricted to scentless mayweed *Tripleurospermum inodorum*, creeping buttercup *Ranunculus repens*, spear thistle *Cirsium vulgare*, creeping thistle *Cirsium arvense* and broad-leaved dock *Rumex obtusifolius*. Areas of damper soils support abundant creeping buttercup alongside frequent fleabane *Pulicaria dysenterica*, knotgrass *Polygonum aviculare*, greater plantain *Plantago major* and fat hen *Chenopodium album*.

Figure 1 Example of Species-Poor Improved Grass Ley

2.1.2 Semi-Improved Species-Poor Grassland

In the south-east of the site lies a derelict and overgrown area of scrubby semi-improved species poor grassland. The area is characterised by tall grassland and occasional common herbs comprising perennial ryegrass, false oat-grass *Arrhenatherum elatius*, ragwort, Michaelmas daisy *Aster novi-belgii*, creeping and spear thistles, common nettle, perforate St. John's wort *Hypericum perforatum* and greater plantain. Since the original survey in 2011, this area has become increasingly encroached by dense bramble *Rubus fruticosus* aggregate scrub.

2.1.3 Arable

The south of the site is dominated by a large arable field over 5ha in extent. At the time of the updating survey the field was ploughed in preparation for cultivation.

2.1.4 Hedgerows, Trees, Woodland and Scrub

The site contains a network of boundary hedgerows (**Figures 2** and **Figure 3**) as well as frequent mature trees and small areas of woodland and scrub. In the north and south of the site the boundaries comprise gappy blackthorn *Prunus spinosa* and hawthorn *Crataegus monogyna* dominated hedgerows with frequent elder *Sambucus nigra*, field maple *Acer campestre*, sycamore *Acer pseudoplatanus*, dog rose *Rosa canina* and a hedge base of dense bramble and common nettle. These boundaries contain a number of large mature pedunculate oaks *Quercus robur* as well as horse chestnut *Aesculus hippocastanum* and ash *Fraxinus excelsior*.

Figure 2: Boundary Hedgerow in North of Site

Figure 3: Boundary Hedgerow with Mature Trees in North-West of Site

Within the centre of the site, hedgerows running north to south comprise dense blackthorn dominated features containing hawthorn, hazel, elder, goat willow *Salix caprea* and frequent small pedunculate oaks, again exhibiting bases of dense bramble and nettle.

In the western central section of the site lies a small area of damp woodland dominated by tall, multi-stemmed crack willow *Salix fragilis* with a ground layer of tall common nettle and

bramble with occasional meadowsweet *Filipendula ulmaria* and a carpet of ground ivy *Glechoma hederacea*. Running south from this damp woodland is a thick hedgerow/tree belt comprising dense elm *Ulmus*, hazel, ash, field maple, elder, blackthorn and hawthorn containing many tall mature oak and ash trees.

The stream channel forming the site's eastern boundary contains relatively few trees and shrubs, with only occasional tall crack willow and ash trees.

The overgrown scrubby field in the south-west of the site contains numerous small self-seeded or planted trees and shrubs including pedunculate oak, sycamore, hawthorn and elder as well as areas of dense blackthorn and bramble scrub.

The northern part of the site contains a number of isolated mature trees, predominantly large pedunculate oak (**Figure 4**).

Figure 4 Isolated Mature Oak Trees in North of Site

2.1.5 Aquatic Habitats

The site contains linear aquatic habitats in the form of a small chalk stream and wet ditches. The chalk stream flows in a southerly direction and forms the eastern boundary of the site. The channel is generally deeply-incised, measuring approximately 2-to-3 metres (m) in width and approximately 1 to 2m deep. At the time of survey, the channel held approximately 0.5m depth of water and the channel substrate comprised a mix of bare coarse gravels and areas of deep fine silt. Aquatic vegetation includes species such as fool's watercress *Apium nodiflorum*, brooklime *Veronica beccabunga*, common water starwort *Callitriche stagnalis*, floating sweet-grass *Glyceria fluitans*, reed canary-grass *Phalaris arundinacea*, great willowherb *Epilobium hirsutum*, hemlock water dropwort *Oenanthe crocata* and yellow flag *Iris pseudocorus*.

Within the centre of the site, a narrow field drainage channel runs east-west, draining into the stream at the eastern site boundary. This ditch is well-vegetated with tall herbaceous vegetation including great willowherb, fool's watercress, hemlock water dropwort, pendulous sedge *Carex pendula*, common nettle, yellow flag, hedge bindweed *Calystegia sepium*, creeping buttercup, floating sweet-grass, brooklime and common reed *Phragmites australis*.

Overall, the site contains minimal aquatic vegetation which is restricted to the small stream at the eastern boundary and the small drainage channel in the centre of the site. These features are generally choked with rank riparian vegetation and the extent of truly aquatic vegetation is minimal. Those species present are generally common and widespread and typical of linear watercourses situated within intensively-managed farmland and likely subject to some level of eutrophication.

2.2 Protected Species

2.2.1 Bats

The site contains a number of large, mature trees situated both within field interiors and adjacent hedgerows/tree belts. In the northern part of the site in particular, a number of these trees exhibit a range of potentially-suitable roosting features such as holes, cracks, splits, exfoliating bark and dense ivy cladding. Overall, at least seven mature trees within the site have been identified as offering moderate to high potential to support roosting bats. Phase 2 surveys were undertaken on these trees in 2012. No bats were recorded emerging from any of the trees during the emergence surveys. During the 2016 walkover, these trees were found to continue to provide bat roosting potential.

The mature hedgerows, small area of damp woodland in the west and chalk stream along the eastern boundary provide good quality bat foraging and commuting habitat. A series of Phase 2 bat activity surveys were undertaken in 2012. These surveys identified a total of six species of bat foraging within the site including common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, noctule *Nyctalus noctula,* serotine *Eptesicus serotinus*, *Myotis* speices[4], and a long-eared bat *Plecotus* species[5]. **Map 1** shows where bats were recorded during the surveys. During each transect the majority of bat registrations were recorded from the more densely vegetated central and northern areas of the site with the

[4] There are seven species of Myotis bats in Britain. Myotis bats are very difficult to identify specifically, this can generally only be done by examination of physical features and Phylogenetic Analysis Identification of bat droppings. Many of these bats are common and will utilise buildings for roosting often occupying small and inaccessible voids. For the purpose of this report all species shall be referred to as Myotis bats unless a specific identification has been possible.

[5] There are two species of long-eared bat, the brown long-eared bat Plecotus auritus and the grey long-eared bat Plecotus austriacus. These species can only be separated by examination of physical characteristics and Phylogenetic Analysis Identification of bat droppings. Unless confirmation of identification has been made by visual identification the two species shall be referred to in this report as long-eared bat. The brown long-eared bat is the commonest of the two species typically being found roosting within large roof voids although small voids and trees are also utilised. The grey long-eared bat is rare and confined to southern England and like the brown long-eared typically roosts in roof voids.

central hedgerows being particularly favoured. Very few bats were recorded in the centre of the fields away from the boundary features with occasional noctule being recorded foraging high over the fields. No significant commuting activity was recorded during the surveys.

2.2.2 Badger

No evidence of badger presence or activity was recorded from the site in 2011/12 or during the updating walkover in 2016. There are no setts, trails, latrines or other conclusive field signs present. A number of well-worn mammal paths are present in the fields and along the base of the hedgerows which may be indicative of badger. The site contains suitable badger habitat in the form of open grassland, hedgerows and scrub and, given the site's rural setting, it is considered highly likely that badgers will be present within the surrounding landscape.

2.2.3 Dormouse

Whilst the site does contain a network of boundary hedgerows and small patches of woodland/tree belts, the majority of hedges are rather gappy and are not well connected to similar features within the wider landscape. There are no large, continuous woodland blocks within the immediate surrounding landscape and the site is effectively surrounded to the north and west by the residential developments of Westergate, Eastergate and Nyton. The hedgerows within the site do not contain key resources such as hazel or honeysuckle and therefore are considered to be of suboptimal value to this species. A dormouse nest tube survey was undertaken in 2012 and no evidence of this species was recorded indicating that they are likely to be absent from the site.

2.2.4 Otter and Water Vole

The stream and drainage channel are considered to be unsuitable for supporting otter; the level of water is minimal and regularly fluctuating and the range of potential prey items such as fish or aquatic invertebrates is likely to be extremely limited. The habitat conditions for water vole are more favourable, with lush riparian vegetation providing abundant food resources and cover. A water vole survey undertaken in 2012 found no evidence of this species on site. The 2016 walkover found the stream and ditch to comprise similar habitat to when originally assessed and no incidental evidence of water vole or otter was recorded.

2.2.5 Breeding Birds

During the 2012 breeding bird survey, a total of 13 species were confirmed as breeding on the site. Of these, six species are listed on the British Trust for Ornithology's (BTO) Red or Amber lists[6] as species of conservation concern, including dunnock *Prunella modularis*,

[6] The UK's birds are split in to three categories of conservation importance - red, amber and green. Red is the highest conservation priority, with species needing urgent action. Amber is the next most critical group, followed by green.

house sparrow *Passer domesticus*, linnet *Carduelis cannabina*, song thrush *Turdus philomelos*, whitethroat *Sylvia communis* and yellowhammer *Emberiza citronella*.

All breeding birds were recorded breeding within the hedgerows on the site with no species associated with the open fields.

2.2.6 Great Crested Newt

The site and its immediate surrounds contain no standing freshwater habitats and therefore there is no potential for the site to support breeding great crested newts. Although the site does contain areas of suitable grassland/scrub habitat for this species in its terrestrial phase, the absence of suitable breeding habitat will significantly reduce the potential for this species to be present. A single pond is situated within 500m of the site. This pond is approximately 110m east of the site on the opposite side of the chalk stream that forms the eastern boundary of the site. This stream, with moderate to fast flowing water, forms a barrier to the site form this pond. Overall it is considered that the site has negligible potential for this species and no further surveys were undertaken.

2.2.7 Common Reptiles

The common reptile survey undertaken in 2012 identified a peak count of three adult slow-worm *Anguis fragilis*, four juvenile slow-worm, five adult common lizard *Zootoca vivipara* and three juvenile common lizard were recorded from the tussocky grassland and scrub edge associated with the south-western field. The survey confirmed the presence of a breeding population of reptiles at the site, however the population supported is considered to be low. The reptile survey only identified reptiles within the south-western field as shown on **Map 1**. This field is becoming increasingly encroached by bramble scrub with fewer areas of open grassland present during the 2016 updating walkover compared with the 2012 survey. Left unmanaged this area would be eventually covered by dense scrub, resulting in the loss of this reptile habitat.

2.3 Summary of Ecological Value of the Site

The large arable and improved grassland fields which make up the majority of the site are typical of agriculturally improved habitats being species poor and comprised of common and widespread species. Even the more diverse areas of unmanaged grassland in the west of the site are comprised of common and widespread species. The most ecologically valuable habitats are the boundary hedgerows with associated mature trees, isolated mature trees, the small area of willow-dominated woodland in the west of the site and the riparian vegetation along the chalk stream and central drainage ditch. Chalk stream habitats are listed as a Biodiversity Action Plan Priority habitat, although the on-site stream does not support the vegetative diversity found in higher quality chalk streams and rivers.

Bat surveys identified a moderate diversity and moderate level of bat activity within the site, with activity concentrated along the mature hedgerows, in particular along the northwest boundary hedgerow. The fields themselves were found to be infrequently used with only occasional foraging activity recorded, primarily by noctule flying over the site.

A number of birds of conservation concern were recorded, again concentrated on the hedgerow habitats. No ground nesting activity was recorded within the fields.

A low population of slow-worm and common lizard was recorded with the population appearing to be restricted to the southwestern unmanaged grassland.

Overall, the site is considered to be of **low ecological value**, with the large fields of improved grassland and managed arable land providing little interest for protected species and a low diversity of vegetation. The mature hedgerows are of local value in terms of vegetative diversity and structure and also provide commuting and foraging habitat for bats and nesting and foraging habitat for birds. The mature and over-mature trees along the hedgerows and within the field in the north of the site are of local interest due to their age and features such as rot holes and deadwood splits which provide suitable bat roosting habitat. Whilst no roosts have been identified in these trees, it is difficult to confirm absence of bat roosts in trees and there is potential for a number of these trees to be used by roosting bats in the future.

3.0 ASSESSMENT OF IMPORTANCE OF SITE AS A BIODIVERSITY CORRIDOR

3.1 Draft Aldingbourne Neighbourhood Plan 2016 – 2036 Allocation

Under the '*Draft Aldingbourne Neighbourhood Plan 2016 – 2036*', which is currently subject to public consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012, the site has been allocated as a '*Biodiversity Corridor*'.

Policy EH2.1 specifically states that:

> *'Green Infrastructure corridors such as woodland and well maintained hedgerows provide important wildlife habitats and cover for migration of wildlife. The parish of Aldingbourne has a number of small copses, old orchards, mature hedgerows, ponds, watercourses and similar habitats hosting a variety of wildlife. These have potential to enhance biodiversity within the parish and provide important connections between the South Downs and the coast, if they are better connected to form wildlife corridors.'*

Within the draft plan, Policy '*EH2 Green Infrastructure and Ecosystems Services*' states that new development within the proposed biodiversity corridors will not be permitted.

3.2 Discussion of Sites Ecological Value as a Biodiversity Corridor

Ecological surveys undertaken at the site have assessed the site as generally being of low ecological value. The large arable and improved grass fields which the majority of the site comprises are typical of agriculturally managed habitats, being of low diversity of common and widespread species of grasses and flowering plants. Surveys for protected species undertaken in 2012 found the fields to be of limited value to protected species with little bat foraging activity, no breeding bird activity and no reptiles within the fields with the exception of the unmanaged southwestern field where a low population of slow-worm and common lizard was found to be present.

The Phase 1 and Phase 2 ecological surveys identified greater ecological value associated with the boundary features, including the hedgerows, small block of willow woodland and the chalk stream and wet ditch habitats. The majority of the hedgerows are characterised by frequent blackthorn and bramble, together with a number of other woody species. The diversity of species may be sufficient for some of the hedgerows to be considered as 'Important' under the Hedgerow Regulations (1997). The hedgerows were found to support a moderate diversity of breeding birds, including six Amber or Red Listed species of conservation concern. The hedgerows were also found to support a moderate diversity of foraging bats. Mature trees within the hedgerows and within the northern field are also of local

ecological value due to their age and potential to support roosting bats, nesting birds and invertebrates.

The chalk stream running down the eastern boundary of the site is of local ecological value, representing a priority habitat. The diversity of vegetation within and along this stream is moderate, although no rare or scarce species have been identified. No evidence of otter or water vole was identified during the ecological surveys and bat activity was low along the stream.

The drainage ditch running west to east across the centre of the site before joining the chalk stream along the eastern boundary is also of local ecological value. The western end of this ditch is associated with a small area of willow woodland and bramble scrub. The eastern end of the ditch is associated with a scrubby hedgerow. The diversity of vegetation associated with this feature is moderate, comprising common and widespread species. The ditch and associated vegetation provides suitable habitat for breeding birds and foraging bats, although only low levels of bat activity were recorded during the surveys.

Features of ecological value associated with the site are therefore considered to be focused on the boundary features, in particular the hedgerows, stream and ditch habitats. This is in line with the statement in Policy EH2.1 which states that '*corridors such as woodland and well maintained hedgerows provide important wildlife habitats and cover for migration of wildlife*'. The intensively managed arable and improved grassland fields are not considered to represent an important biodiversity corridor, although the margins of these fields associated with the hedgerows, ditches and streams may be considered as part of the corridor. **Map 2** provides an illustration of the areas on site that are assessed as being of local ecological value that provide some function as a biodiversity corridor.

4.0 CONCLUSIONS AND RECOMMENDATIONS

Features of greatest ecological value on the site are focused on the linear boundary habitats including the boundary hedgerows, chalk streams and drainage ditches. The open fields which the majority of the site comprises are of little ecological interest with the exception of a small number of scattered mature trees in the northern field and the unmanaged scrubby grassland in the southwest field which supports a low population of reptiles. The linear features are likely to provide some function as a biodiversity corridor, but the large intensively managed fields are unlikely to provide an important function as a biodiversity corridor.

There are considerable opportunities for enhancing the existing linear habitats and improving their function as biodiversity corridors which could be achieved through funding associated with mitigation and enhancement measures as part of any proposed development of the site. A detailed mitigation and enhancement strategy would need to be developed based on updating Phase 2 surveys and an assessment of the development proposals. However, examples of potential ecological enhancement measures that could be incorporated into the design of any future development include:

- *Creation of a wide corridor along the banks of the chalk stream which runs down the eastern boundary of the site.* A footpath running parallel with the stream results in a moderate disturbance of this habitat with a number of eroded banks where dogs enter the stream and evidence of littering and dog fouling. Fencing off a buffer would minimise disturbance of the watercourse and the margins could be seeded with native wildflower meadow mixtures to enhance the diversity of this habitat and its value for invertebrates, reptiles and foraging bats and birds.

- *Diversifying and strengthening of hedgerow network.* A number of the hedges are gappy and of low diversity with areas dominated by bramble. New planting of native trees and shrubs would improve the diversity of these hedgerows and provide improved habitat for a range of species including nesting birds and foraging and commuting bats.

- *Management of scrub encroachment and diversification of grassland habitat.* Much of the southwestern area which has not been managed for a number of years is becoming encroached by dense bramble scrub. This scrub will eventually encroach all of the areas of grassland in this location, having a detrimental impact on reptile habitat. By managing the grassland and scrub to create a mosaic of habitats, this area has potential to be improved for reptiles and other species such as nesting birds and foraging bats. The grassland could also be improved through the sowing of wildflower meadow mixture and/or plug planting of species.

Through the implementation of appropriate mitigation and enhancement measures, the development of the existing fields of arable and improved grassland areas are not anticipated to have a significant adverse impact on ecology and the enhancement of retained boundary features could help contribute to the value of these as biodiversity corridors.

Map 1 Phase 2 Survey Results

WESTERGATE, WEST SUSSEX

PHASE 2 ECOLOGICAL SURVEY

Map 1 - Phase 2 Survey Results

Client: Hampshire Developments

Date: December 2012 | Status: Final

KEY

- Site Boundary
- Improved, Species-poor Grassland
- Scrubby Grasland With Tall Herbs
- Defunct Arable Field
- Field Boundary
- Watercourse
- Tree/Large Shrub
- Willow Woodland
- Hedgerow or Scrub
- 1 — Trees Subject to Phase 2 Bat Survey
- Common Pipistrelle Records
- Soprano Pipistrelle Records
- Noctule Records
- Myotis Records
- Long-eared Bat Records
- Serotine Records

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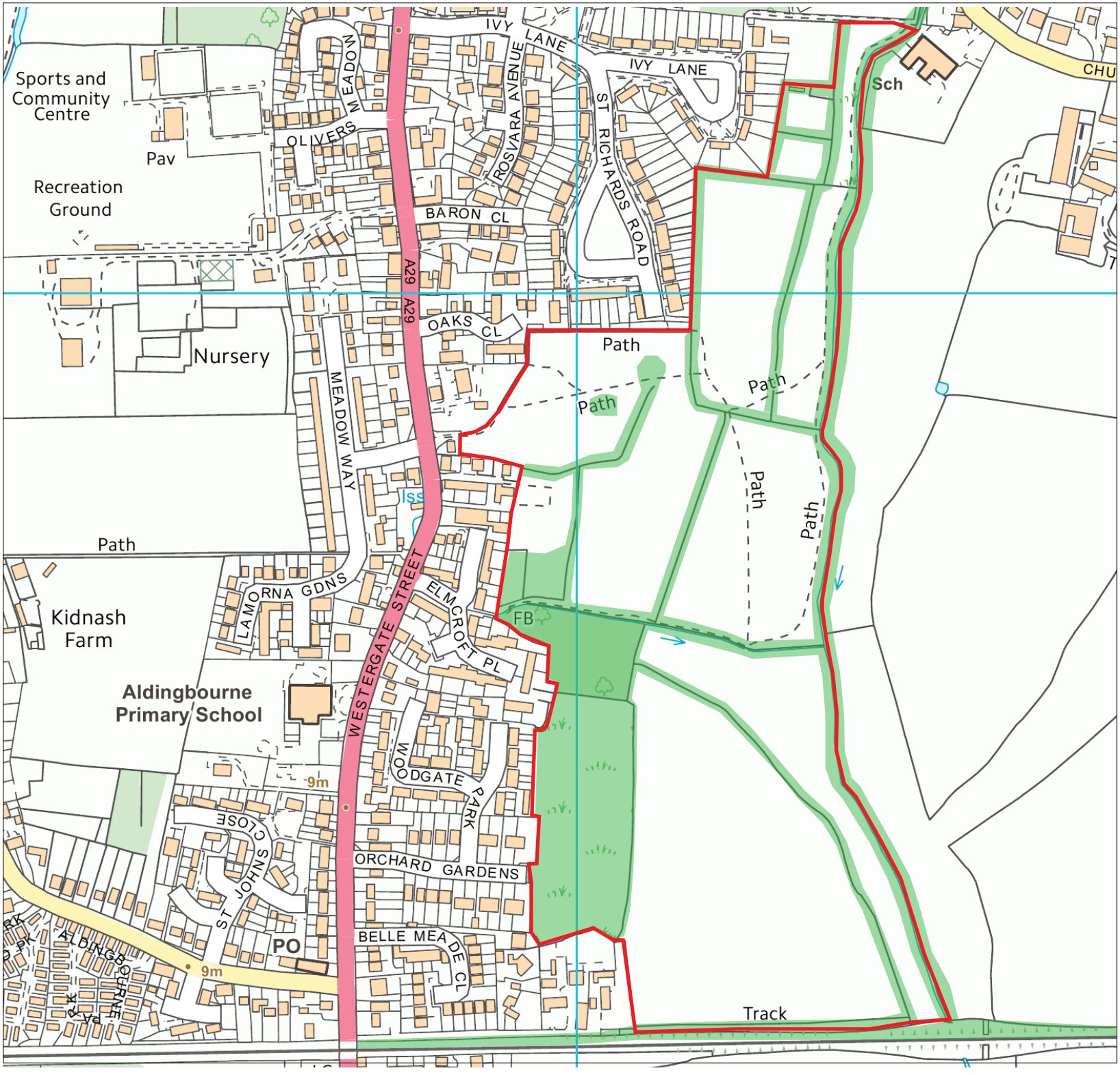
Map 2 Areas of Ecological Value



LAND AT WESTERGATE, WEST SUSSEX

ASSESSMENT OF VALUE OF SITE AS A BIODIVERSITY CORRIDOR

Map 2 - Areas of Ecological Value

Client: Cala Group Ltd	
Date: March 2016	Status: Final

Site Boundary

Areas of Comparative Ecological Value

N

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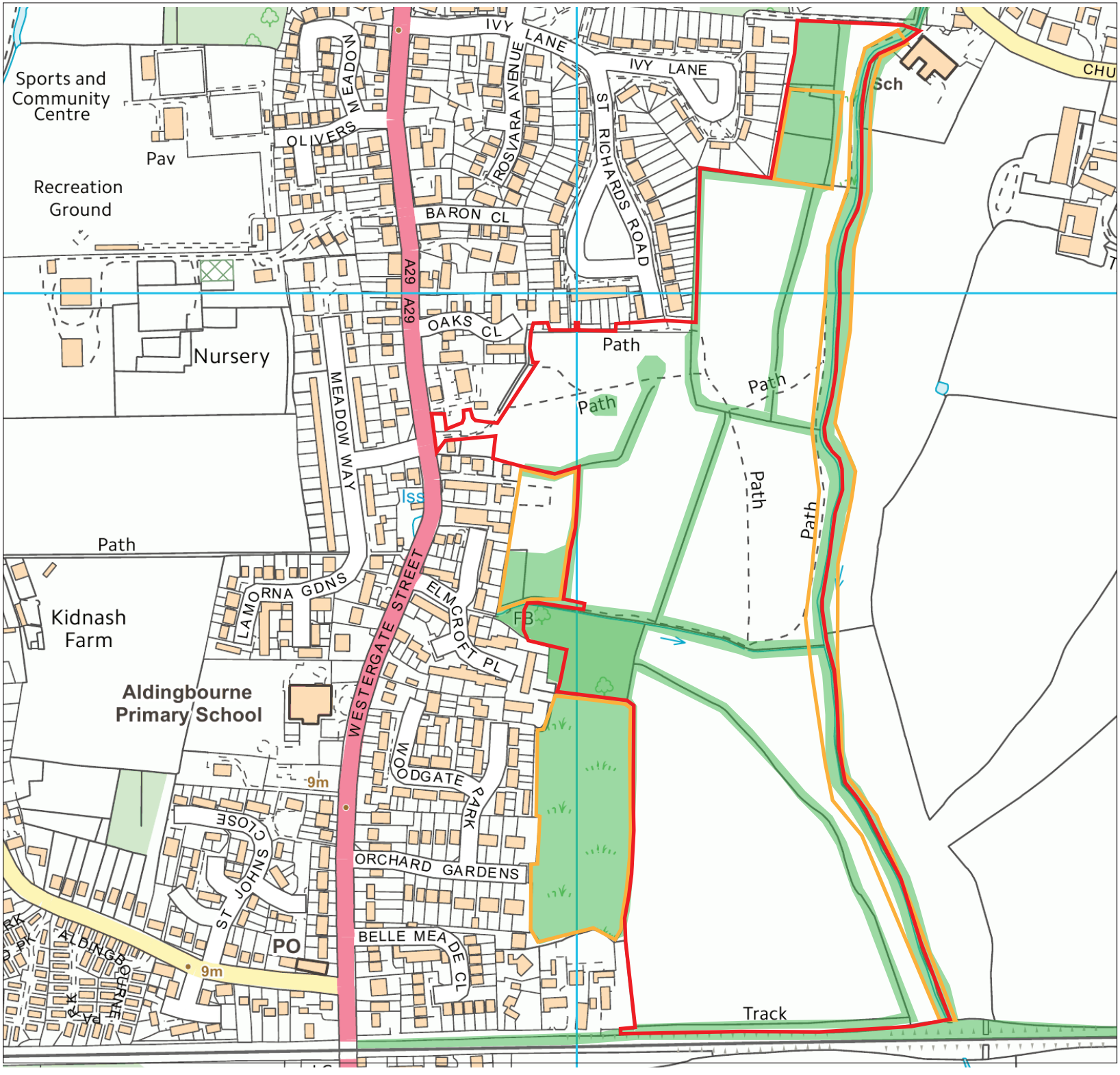

LAND AT WESTERGATE, CHICHESTER

ECOLOGICAL CONSTRAINTS AND OPPORTUNITIES

Map 1 - Ecological Constraints and Opportunities

Client: Luken Beck

Date: June 2016 | Status: Draft

KEY

- Site Boundary
- Areas of Comparative Ecological Value
- Opportunities for Enhancement

N

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