

WSCC ECOLOGY response to planning consultation

Application reference number: WSCC/052/20

Location: Land to the north of Eastergate & north-west of Barnham, PO22 0DF

Proposal: The construction of a 1.3km single carriageway with a 3m wide shared cycleway/footway, 2.5m wide central island, one uncontrolled pedestrian crossing with a central island to enable users of the PRow to cross the carriageway, three roundabouts, provision of hard and soft landscaping, road markings, traffic signals, bus stops, and signalised pedestrian crossings, construction of a substation building; installation of a noise barrier, and associated works

Grid reference: 495154 105524

Date: 09/12/20

Summary Response

No objection subject to the delivery of the full package of ecological mitigation, compensation and enhancement measures, plus security of long term habitat management, as outlined in the documents supporting the planning application, including the Environmental Statement, Construction Environmental Management Plan (CEMP) and Ecological Management Plan (EMP). Without such measures, the scheme would cause long lasting ecological damage. Thus, it is recommended that these ecological measures are required through conditions.

Response

Although there are no statutory or non-statutory designated wildlife sites within the Application Site, the area is known to be of ecological value. Habitats of Principal Importance (as listed in Section 41 of the NERC Act 2006) including traditional orchards and hedgerows are present within the Application Site, as well as areas of semi-improved grassland and scrub which are also of some wildlife value. A number of legally protected species, including bats, badgers and reptiles (slow-worm, common lizard and possibly grass snake) occur within the Application Site. There are a number of badger setts within the area, including a main sett located within the alignment of the Scheme.

The Scheme will result in the direct loss of wildlife habitat, disturbance to retained habitats and severance of wildlife corridors. In the absence of mitigation, this would result in adverse impacts on notable and protected habitats and species during both the construction and operational phases. A package of mitigation measures are proposed in a Construction Environmental Management Plan (CEMP), Ecological Management Plan (EMP), Landscape Maintenance and Management Plan (LMMP) and other documents.

The Biodiversity Net Gain Assessment is welcomed. However, it is regrettable that the scheme, as proposed, does not achieve the target of a 10% scheme-wide net gain for biodiversity. Given the loss and severance of linear habitats,

including tree lines and hedgerow, which may serve as important wildlife corridors, it is particularly unfortunate that the scheme fails to deliver a 10% net gain of hedgerow. It is recommended that efforts should be made to plant an additional 50m of hedgerow, such as through agreement with an adjacent landowner.

It is recommended that further areas of wildflower grassland are created along the route, such as the verges and roundabouts currently proposed as amenity grassland. If sown on sub-soil, the mowing requirements would be reduced whilst maximising biodiversity gain.

To ensure there are no significant long term ecological impacts, it will be important that the proposed package of mitigation and enhancement measures are implemented in full, including the creation of wildflower meadows, wet grassland, a small orchard, scrub and species-rich hedgerow, plus a badger crossing and bat boxes. Furthermore, it will be critically important that all retained and created habitats are managed in a favourable condition over the long term, as outlined in the Landscape Maintenance and Management Plan (LMMP).

Given the ecological sensitivities, it is recommended that the Applicant appoints an Ecological Clerk of Works to ensure appropriate mitigation measures for protected species, including those subject to any Natural England licence requirements, to ensure proper protection of retained habitats, oversee vegetation clearance works, resolve any unforeseen issues and ensure all opportunities for biodiversity enhancement are maximised.

Recommended Conditions

1. Construction Environmental Management Plan (CEMP)

All development hereby permitted shall be carried out and completed in accordance with the submitted Outline Construction Environmental Management Plan (CEMP) for Planning Submission (Appendix 3.5 of the submitted A29 Realignment Phase 1 Environmental Statement) save for any variation thereto which may be submitted to and approved in advance in writing by the County Planning Authority.

Reason: To ensure that any adverse environmental impacts of construction activities are mitigated.

2. Securing on-site ecological expertise during construction

No development shall commence until the role and responsibilities and operations to be overseen by an **ecological clerk of works/ on-site ecologist** have been submitted to and approved in writing by the County Planning Authority. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.

Reason: To ensure adequate professional ecological expertise is available on site during construction to assist those implementing the development to comply

with statutory requirements, planning conditions and any relevant protected species licences.

3. Implementation of ecological mitigation, compensation and enhancement measures

The full package of ecological mitigation, compensation and enhancement measures (including the creation of wildflower meadows, wet grassland, a small orchard, scrub and species-rich hedgerow, plus a badger crossing and bat boxes) must be delivered as described in the supporting documents, notably the Construction Environmental Management Plan (CEMP), Ecological Management Plan (EMP) and Landscape Maintenance and Management Plan (LMMP). Any variation must be submitted to and approved in advance in writing by the County Planning Authority.

Reason: To minimise adverse impacts on biodiversity, including protected species.

4. Securing long term management of retained and created habitats

Full details of the management of retained and created habitats, such as through a revised Landscape Maintenance and Management Plan (LMMP), shall be submitted to, and be approved in writing by, the County Planning Authority prior to completion of the works.

Reason: To ensure the long term management of habitats and protected species.

WSCC ECOLOGY response to HRA Screening

Summary Response

This project will not have any significant adverse effect, either alone or in combination with other relevant projects and plans, on the integrity of any European designated site. Consequently, an Appropriate Assessment is not required.

Response

A Habitats Regulations Screening Assessment (HRSA) has been submitted with the planning application. As identified in that report, there are no European Sites within 5km of the proposed road scheme, though Pagham Harbour SPA and Ramsar Site, Duncton to Bignor Escarpment SAC and Solent and Dorset Coast SPA all lie within 10km (10km being the zone of influence commonly applied for screening).

The HRSA considered potential impact pathways on each of these European Sites, including water pollution, hydrological change, air pollution, recreational effects and loss of supporting habitat. In each case it concluded no likely significant effects on any European Sites.

The HRSA then considered potential in-combination effects. There could be potential for the road to contribute to in-combination effects alongside other

developments locally, in particular with the proposed second phase of the A29 alignment to the south. Phases 1 and 2 of the A29 schemes, plus other local developments, form part of the Barnham, Eastergate and Westergate (BEW) Strategic Allocation as identified in the Arun Local Plan 2011-2031. The Arun Local Plan was subject to an Appropriate Assessment in 2017 and it can be concluded from this that no in-combination effects with other developments, notably the BEW Strategic Allocation, are anticipated.

In summary, this project will not have any significant adverse effect, either alone or in combination with other relevant projects and plans, on the integrity of any European designated site. Consequently, an Appropriate Assessment is not required.

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