

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: 08/06/21

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 main issues of concern raised in my previous comments of 09/12/20 appear to have been largely addressed. However, greater commitment to creating further areas of wildflower grassland along the route, such as the

verges and roundabouts, instead of amenity grassland, would have been welcome. Section 86 of the Reg 25 Response Table states that the following are to be addressed:

'Landscape design has advanced since submission of the planning application in October 2020. ... the landscape design is evolving to replace remaining areas of amenity grassland with wildflower meadow.' Maybe this can be covered through planning conditions.

The revised plans which seek to achieve a scheme-wide 10% biodiversity net gain are welcome but this will only be secured in perpetuity through rigorous adherence to approved long term maintenance plans.

The Outline Lighting Management Scheme is welcomed in relation to lighting management (dimming and/or turning off lighting units at sensitive locations) to reduce impacts on bats.

The Integration Statement (Appendix 14.2) is helpful in outlining the joint approach being taken by Barratt David Wilson Homes and West Sussex County Council to minimize adverse and cumulative impacts on biodiversity, and maximise biodiversity net gain across the adjoining developments. The joint approach covers green infrastructure/wildlife corridors, lighting and protected species.

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.

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