

Technical Note 01

Project: Land West of Ashington, Pulborough (1006455)

Planning Ref: DC/23/0406

Date: March 2025

Review of Updated Scheme and Consideration of Planning Consultation Response from Place Services (dated 13th February 2025)

1 Introduction

- 1.1.1 Aspect Ecology is advising Bellway Homes Ltd (South East) in regard to ecological matters at land west of Ashington, Pulborough. An application has been submitted at the site for the demolition of existing buildings and erection of 180 dwellings, sports pavilion, sports pitches and allotments; with associated access, landscaping, open space and infrastructure (planning application ref: DC/23/0406).
- 1.1.2 The application was informed by ecological survey and assessment work completed by Aspect Ecology, formally reported within an Ecological Appraisal dated February 2023 (ref: 6455 EcoAp v1 AH/JL).
- 1.1.3 Following consultation comments (notably from the Parish Council), a number of resubmissions have been made to amend the scheme. In June 2024, the scheme was amended to provide a Multi-Use Games Area and full sized football pitch along with improvements to the proposed sports pavilion, accompanied by an Ecological Addendum (Aspect Ecology, June 2024). Later resubmissions have reduced the number of dwellings. Bellway Homes Ltd are now submitting another revision to address the latest comments received. Accordingly, planning consent is now sought for the demolition of existing buildings and erection of 152 dwellings, all-weather sport pitch, sports pavilion and allotments; with associated access, landscaping, open space and infrastructure.
- 1.1.4 Throughout the planning process, Place Services (providing advice on behalf of Horsham District Council) has provided comments in regard to ecology. The initial response (dated 3 May 2023) raised no ecological objections to the proposed development and recommended approval subject to conditions. However, the subsequent response (dated 16 July 2024) requested further information on bats and Dormouse, following amendments to accommodate the Multi-Use Games Area and full sized football pitch. A response was provided by Aspect Ecology on 27 September 2024 (ref: ECO6455.007.let.ps). Further comments have been received from Place Services (dated 13 February 2025) in relation to the October 2024 resubmission, which continues to request further information on bats and Dormouse.
- 1.1.5 Accordingly, this note provides consideration of the latest revisions to the scheme under this new submission, and provides a response to the latest comments received from Place Services.

2 Place Services Consultation Response

- 2.1.1 Queries raised by Place Services are largely a result of changes to the scheme under the June 2024 resubmission, involving loss of dense scrub vegetation at the northern edge of the site to

accommodate relocation of a proposed attenuation basin and removal of two Oak trees supporting bat roosting potential (trees 65 and 66, identified as T2 and T3 in the February 2023 Ecological Appraisal) to accommodate a revised drainage connection, with associated impacts on bats and Dormouse.

- 2.1.2 Aspect Ecology's response (dated 27 September 2024) provided details of a ground level tree assessment (GLTA) of the affected trees, although the latest Place Services consultation response (dated 13 February 2025) sets out that further assessment of these trees is required, comprising inspection at height or emergence surveys in line with BCT survey guidelines.
- 2.1.3 In regard to Dormouse, the latest Place Services response sets out that appropriate outline mitigation and compensation measures to support a European Protected Species Mitigation Licence (EPSML) application to Natural England should be submitted to the LPA prior to determination.
- 2.1.4 The latest Place Service response also highlights that surveys for roosting bats and buildings were undertaken in February 2022 and are now 3 years old. Accordingly a further preliminary roost assessment should be undertaken.

3 Review of Amendments to Proposed Scheme

- 3.1.1 The revised Landscape Masterplan is appended to this note. As this shows, the broad areas of built development and open space remain the same as under the previous submission, although there are some changes to the detailed layout and housing mix within the built development areas.
- 3.1.2 The main change of relevance in terms of ecology is trees 65 and 66 in the north-western part of the site are now shown to be retained, such that all trees with bat roosting potential are now retained under the proposals.
- 3.1.3 Otherwise, changes to the scheme do not result in any additional effects on ecology, such that the previous assessment set out within the February 2023 Ecological Appraisal and June 2024 Ecological Addendum remains valid.

4 Consideration of Place Service Comments

4.1 Bats

- 4.1.1 Trees 65 and 66 supporting bat roosting potential are now fully retained within an open space area under the layout. Accordingly, these trees would not be subject to any direct effects, whilst indirect effects such as lightspill can be controlled by a sensitive lighting strategy to be secured by planning condition (following mitigation measure MM6 set out within the Ecological Appraisal). As such, specific climbing or emergence surveys of these trees would not be required (in accordance with Figure 6.1 of the BCT survey guidelines).
- 4.1.2 In regard to roosting assessment of buildings, two buildings are present within the site (identified as B1 and B2 within the February 2023 Ecological Appraisal). These comprise modern agricultural buildings, of steel frame construction with a cement base, corrugated metal walls and open vault pitched metal/asbestos roofs. Given the nature of their construction and lack of potential roosting features, the buildings were assessed as providing negligible bat roosting potential.

- 4.1.3 The site has been revisited in August 2024 to carry out a GLTA of trees 65 and 66 (as set out Aspect Ecology's September 2024 response). Although a specific inspection of buildings was not undertaken during this visit, buildings B1 and B2 were viewed and no changes to the condition or structure of these buildings was noted. Accordingly, given the nature of construction of these buildings, no additional roosting potential would have developed, and the conclusions of the previous assessment are considered to remain valid.

4.2 Dormouse

- 4.2.1 Comments from Place Services highlight that appropriate outline mitigation and compensation measures to support an EPSML application to Natural England for Dormouse should be submitted to the LPA prior to determination.
- 4.2.2 The February 2023 Ecological Appraisal provides an assessment of Dormouse, detailing survey work undertaken which confirmed presence of this species on site, whilst an overview of licensing requirements and consideration of the three derogation tests is set out under MM9-MM11 at Section 7. This sets out the planning need, consideration of alternatives and proposes safeguards and replacement habitat to maintain favourable conservation status.
- 4.2.3 The June 2024 Ecological Addendum provides justification for the additional vegetation loss resulting from the changes to sports provision and sets out proposals for additional compensatory planting, with areas of replacement scrub planting shown on the accompanying Landscape Masterplan. This ensures that potential Dormouse habitat is compensated for on at least a 1:1 basis. Further discussion is also set out in the September 2024 response.
- 4.2.4 Accordingly, the above information is considered to provide sufficient detail to the LPA at this stage regarding impacts on Dormouse and the proposed approach to licensing, mitigation and compensation. Notably, this sets out the presence of Dormouse and the extent to which it may be affected by the proposed development (according with paragraph 99 of the ODPM Circular 06/2005), whilst consideration of the three derogation tests sets out that there is no reason to suggest that a licence would not be granted by Natural England.
- 4.2.5 Further detail regarding mitigation and compensation would be agreed with Natural England as part of the EPSML, including specific timings of works, methodology for clearance works and details of new compensation planting. It is noted that there is scope for additional planting within open space areas if required, albeit the current proposals allowing for at least 1:1 replacement are considered to be sufficient.
- 4.2.6 This is in line with Natural England's Guidance Note on Application of the 'Three Tests' to Licence Applications¹ which states that *"the level of detail (including specific information on the timing of implementation) required for a licence application is not usually available at the planning application stage. The level of species detail in respect of the compensation, mitigation and its delivery for any proposed development that is required at the licensing stage when Natural England will be required to satisfy itself of the three tests, will also be higher than that ordinarily required in the planning consent process. Such level of detail often may only be available at a detailed stage of the development's evolution."*

¹ Natural England (2010) *Natural England Guidance Note: European Protected Species and the Planning Process. Natural England's Application of the 'Three Tests' to Licence Applications.*

5 Summary and Conclusion

- 5.1.1 This note provides a review of the latest revisions to the scheme under the new submission, and consideration of the latest consultation response received from Place Services (dated 13 February 2025).
- 5.1.2 Under the revised scheme, the main change of relevance in terms of ecology is trees 65 and 66 in the north-western part of the site are now shown to be retained, such that all trees with bat roosting potential are now retained under the proposals. Otherwise, changes to the scheme do not result in any additional effects on ecology.
- 5.1.3 In regard to comments from Place Services, following retention of trees 65 and 66 under the layout, further climbing inspections and/or emergence surveys are not required, whilst the site visit in August 2024 has confirmed no change to the bat roosting potential supported by onsite buildings.
- 5.1.4 A review of information provided in relation to Dormouse is set out within this note. This information is considered to provide sufficient detail to the LPA at this stage regarding impacts on Dormouse and the proposed approach to licensing, mitigation and compensation.
- 5.1.5 Accordingly, the outstanding comments raised by Place Services are considered to be addressed and sufficient information is provided to allow the planning application to be determined (subject to Natural England's formal comments on the conclusion of the LPA's water neutrality and bat Appropriate Assessments).

PLANT SCHEDULE			
TREES			
PLANT NAME	STOCK	GIRTH	HEIGHT
Acer davidii	C	18-20cm	min. 4.5m
Acer campestre	C	20-25cm	min. 4.5m
Amelanchier lamarckii	C	Multistem	min. 4.5m
Betula pendula	C	20-25cm	min. 4.5m
Betula utilis jacquemontii	C	Multistem	min. 4.5m
Cedrus atlantica	C	20-25cm	min. 4.5m
Fagus sylvatica 'Riversii'	C	20-25cm	min. 4.5m
Ginkgo biloba	C	20-25cm	min. 4.5m
Koeleruteria paniculata	C	18-20cm	min. 4.5m
Liquidambar styraciflua	C	20-25cm	min. 4.5m
Malus 'Evereste'	C	18-20cm	min. 4.5m
Malus domestica 'Red Devil'	B	8-10cm	250-300cm
Prunus 'Amanogawa'	C	18-20cm	min. 4.5m
Prunus avium	C	20-25cm	min. 4.5m
Prunus avium 'Plena'	C	20-25cm	min. 4.5m
Prunus avium 'Napoleon	B	8-10cm	250-300cm
Prunus domestica 'Diamond'	B	8-10cm	250-300cm
Prunus sargentii	C	20-25cm	min. 4.5m
Prunus x subhirtella 'Autumnalis'	C	Multistem	min. 4.5m
Pyrus calleryana 'Chanticleer'	C	18-20cm	min. 4.5m
Pyrus communis 'Beth'	B	8-10cm	250-300cm
Sorbus aria	C	20-25cm	min. 4.5m
Sorbus aucuparia	C	20-25cm	min. 4.5m
Sorbus aucuparia 'Sheerwater Seedling'	C	20-25cm	min. 4.5m
Tilia cordata	C	20-25cm	min. 4.5m
Tilia cordata 'Winter Orange'	C	20-25cm	min. 4.5m
Tilia tomentosa	C	20-25cm	min. 4.5m
Ulmus 'Horizon'	C	20-25cm	min. 4.5m

HEDGES		
PLANT NAME	STOCK	SIZE
Fagus sylvatica	C 10L	150-175cm
Elaeagnus angustifolia 'Quicksilver'	C 10L	60-80cm
Hebe 'White Gem'	C 10L	40-60cm
Taxus baccata	C 10L	80-100cm
Viburnum tinus 'Eve Price'	C 10L	100-120cm

SHRUBS			
PLANT NAME	STOCK	SIZE	SPACING
Ceanothus thyrsiflorus var. repens	C 3L	30-40cm	6/m2
Choisya ternata 'Aztec Pearl'	C 5L	40-60cm	5/m2
Cistus x argenteus 'Silver Pink'	C 5L	40-60cm	5/m2
Cornus alba	C 5L	60-80cm	5/m2
Cornus kousa chinensis	C 20L	100-125cm	1/m2
Cornus sanguinea 'Midwinter Fire'	C 5L	40-60cm	3/m2
Cornus stolonifera 'Flaviramea'	C 5L	60-80cm	3/m2
Escallonia 'Apple Blossom'	C 3L	40-60cm	6/m2
Hebe 'Autumn Glory'	C 5L	40-60cm	5/m2
Hebe 'Great Orme'	C 5L	40-60cm	5/m3
Hebe 'Midsummer Beauty'	C 5L	40-60cm	5/m3
Hebe sutherlandii	C 5L	40-60cm	5/m2
Hypericum 'Hidcote'	C 5L	40-60cm	5/m2
Lavandula angustifolia 'Hidcote'	C 5L	30-40cm	5/m2
Magnolia stellata	C 10L	60-90cm	1/m2
Olearia macrodonta	C 3L	20-30cm	6/m2
Osmanthus burkwoodii	C 5L	40-60cm	5/m2
Pittosporum eugenioides 'Variegatum'	C 5L	40-60cm	7/m2
Rosmarinus officinalis	C 3L	20-30cm	5/m2
Sarcococca hookeriana 'Purple Stem'	C 5L	40-60cm	5/m2
Skimmia japonica 'Rubella'	C 5L	40-60cm	6/m2
Viburnum davidii	C 5L	30-40cm	6/m2

HERBACEOUS		
PLANT NAME	STOCK	SPACING
Acanthus mollis	C 3L	5/m2
Achillea millefolium 'Summer Pastels'	C 3L	6/m3
Agapanthus 'Africanus'	C 2L	8/m2
Alchemilla mollis	C 2L	9/m2
Anemone 'Honorine Jobert'	C 2L	8/m3
Bergenia 'Abendglut'	C 2L	9/m2
Miscanthus sinensis 'Morning Light'	C 2L	8/m2
Geranium macrorrhizum 'Spessart'	C 2L	9/m2
Libertia formosa	C 2L	9/m2
Libertia grandiflora	C 2L	9/m2
Luzula nivea	C 5L	5/m2
Nepeta 'Six Hills Giant'	C 2L	9/m2
Pennisetum setaceum 'Purpureum'	C 3L	7/m2
Polystichum setiferum	C 2L	7/m2
Rudbeckia fulgida sullivanti 'Goldsturm'	C 2L	9/m2
Stipa tenuissima	C 2L	9/m2
Verbena bonariensis	C 2L	9/m3

NATIVE WOODLAND & BUFFER MIX			
PLANT NAME	%	STOCK	SIZE
Acer campestre	2.0%	B Trans	150-175cm
Cornus sanguinea	5.0%	B Trans	60-80cm
Corylus avellana	5.0%	B Trans	80-100cm
Crataegus monogyna	20.0%	B Trans	100-125cm
Euonymus europaeus	3.0%	B Trans	60-80cm
Ilex aquifolium	12.5%	B Trans	60-80cm
Ligustrum vulgare	3.0%	B Trans	100-125cm
Lonicera periclymenum	3.0%	C 3L	60-80cm
Pinus sylvestris	1.0%	C 3L	30-40cm
Prunus spinosa	12.5%	B Trans	80-100cm
Quercus robur	1.0%	B Trans	150-175cm
Rosa canina	5.0%	B Trans	60-80cm
Ulex europaeus	12.5%	C 3L	30-40cm
Sambucus nigra	5.0%	B Trans	100-125cm
Sorbus torminalis	1.5%	B Trans	175-200cm
Viburnum lantana	3.0%	B Trans	60-80cm
Viburnum opulus	5.0%	B Trans	100-125cm

BULBS		
PLANT NAME	GRADE	SPACING
Crocus Jeanne d'Arc	7-8cm	30/m2
Cyclamen hederifolium	13-15cm	20/m2
Galanthus nivalis	5-6cm	20/m2
Hyacinthoides non-scripta	5-6cm	20/m2
Narcissus 'February Gold'	10-12cm	20/m2



- Legend
- Site boundary

Existing vegetation (trees, scrub, hedges) to be retained

Existing pond to be retained and enhanced
- PROPOSED SOFT LANDSCAPE
- Native and ornamental feature tree in key character locations

Native and ornamental tree in public open space

Street tree in residential area

Orchard tree planting

Proposed native hedgerow

Hedge planting

Ornamental shrub and herbaceous mix planting

Bulb planting

Wildflower meadow mix

Hedgerow meadow mix to existing dense vegetation edge

Wetland meadow mix to swale and retention basin

Amenity grass

Back gardens

Proposed landform
- PROPOSED HARD LANDSCAPE
- Asphalt to carriageway and pavement

Block paving to secondary and shared drives streets

Block paving to parking bays

Front garden path

Mown grass footpath in public open space

Soft landing gravel or similar to footpaths in allotments and public open space

Play equipment set in grass over rubber mat

Seating

Mounding, boulders and logs element as informal play elements

Stabilised gravel to allotment car park

0 10 50m