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4th December 2024

Ref: Letter response –
Pulborough Rugby Football Club Pulborough Road Cootham Pulborough
Erection of a single storey side extension to the existing clubhouse for additional changing facilities with 10no. rooflights. Erection of a single storey Training Barn facility with 8no. rooflights. Installation of 4no. luminaires to the existing floodlight columns to provide lighting for Training pitch located North-West of the site. DC/22/1585

To whom it may concern,

INTRODUCTION

The Ecology Co-op has been commissioned to produce a report on the behalf of Pulborough Rugby Football Club to discharge planning conditions of planning application DC/22/1585.

This letter report seeks to discharge the following conditions;

"3 Pre-Commencement (Slab Level) Condition: *The 4no. luminaires hereby permitted shall not be first used until a Biodiversity Enhancement Layout, providing the finalised details and locations of the enhancement measures contained within the Preliminary Roost Assessment & Bat Scoping Survey (Drummond Ecology, August 2023) has been submitted to and approved in writing by the Local Planning Authority. The enhancement measures shall be implemented in accordance with the approved details prior to the first use of the luminaires and all features shall be retained in that manner thereafter.*

Reason: To enhance protected and Priority species and allow the Local Planning Authority to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

4 Pre-Use Condition: *The 4no. luminaires hereby permitted shall not be first used a lighting design scheme for biodiversity has been submitted to and approved in writing by the Local Planning Authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can*

be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory. The 4no. luminaires shall be installed in accordance with the specifications and locations set out in the scheme, and shall be maintained thereafter in accordance with the scheme. Under no circumstances shall any other external lighting be installed without prior consent from the local planning authority.

Reason: To allow the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species) and Policy 31 of the Horsham Development Framework.

***5 Regulatory Condition:** All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Roost Assessment & Bat Scoping Survey (Drummond Ecology, August 2023) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.*

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.

Reason: To conserve and enhance protected and Priority species and allow the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species) and Policy 31 of the Horsham Development Framework."

The site is located in a rural area approximately 1.7km east of central Storrington. The central grid reference for the site is TQ 0699 1498. The site is in use as a rugby club house with associated playing and training fields.

The proposed development seeks to erect a single storey side extension to the existing clubhouse for additional changing facilities with 10no. rooflights. Works will also erect a single storey training barn facility with 8no.rooflights and install 4no. luminaires to the existing floodlight columns to provide lighting for the training pitch located to the north-west of the site.

The site was subject to a Preliminary Roost Assessment & Bat Scoping Survey[1] undertaken on the 22nd May 2023 and an Emergence & Return to Roost Survey[2]. The surveys concluded that no bats were seen emerging from the property.

DISCHARGE OF CONDITIONS

Condition 3:

[1] Drummond Ecology (2023) Preliminary Roost Assessment & Bat scoping Survey. Pulborough Rugby Club

[2] Drummond Ecology (2023) Emergence & Return to Roost Survey. . Pulborough Rugby Club

Enhancement measures suggested within the Preliminary Roost Assessment (paragraph 6.3.2) and Emergence Survey Report (paragraph 5.6) suggests that sympathetic planting of native shrubs and the inclusion of bat boxes/tiles would provide an increase in biodiversity value.

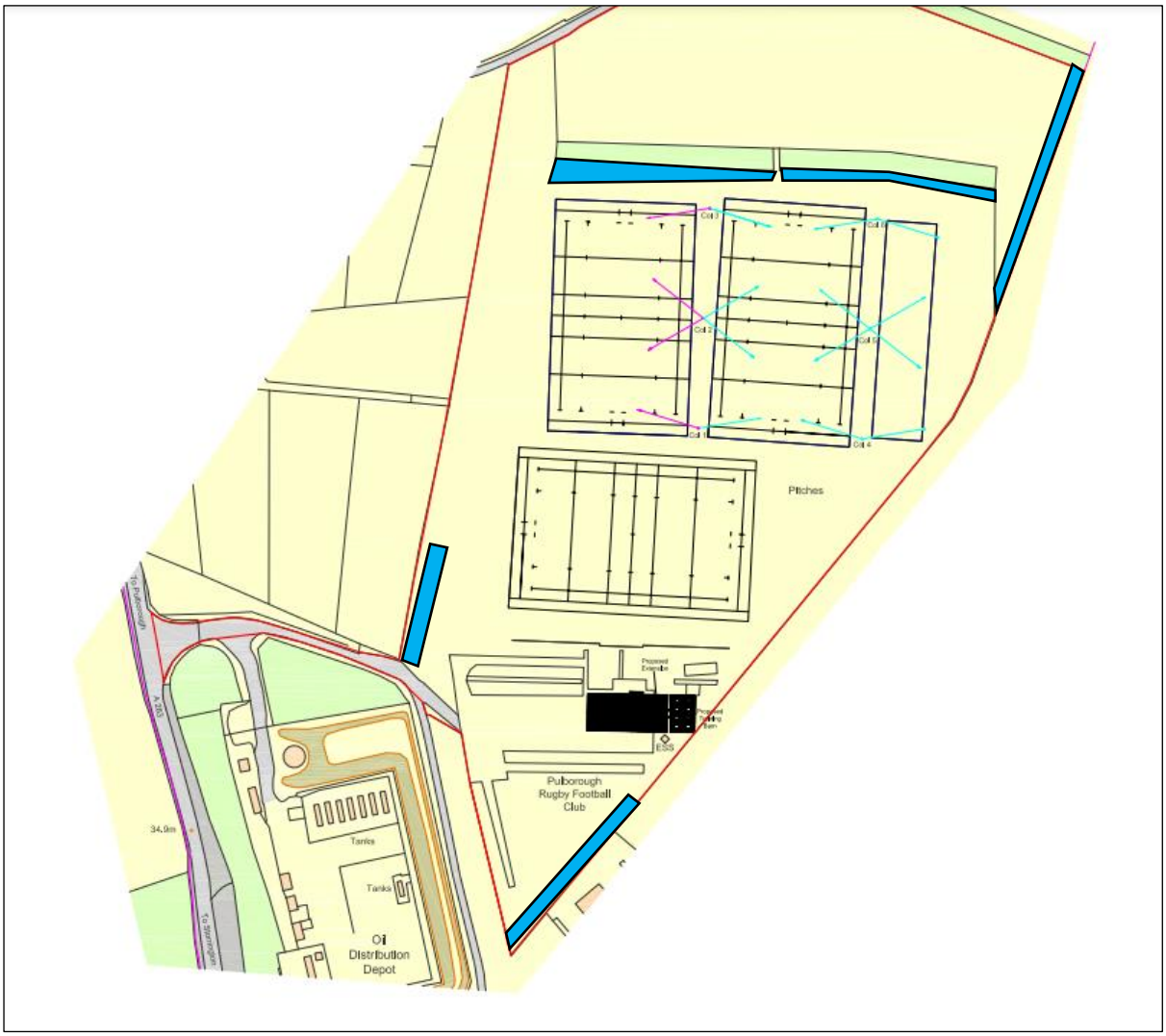

Figure 1. Red line boundary of Pulborough Rugby Club with proposed development to clubhouse illustrated. Areas of suitable shrub creation indicated with blue polygons. Image reproduced courtesy of COH surveyors. Drawing number 837.17.01 Revision B, dated August 2022.

Parcels of shrub are proposed to the areas highlighted in Figure 1 above. A number of possible areas have been selected that would benefit bats, birds and other native wildlife it is not essential that all areas are created but at a minimum a single area created that would provide a long term increase in biodiversity on site.

The shrub parcel must be planted with native species (a minimum of four species) with at least one of which a woody species. The specific species compositions should vary based on adjacent habitats though an example of suitable species is as follows:

- bramble Ru*bus fruiticosa agg.*
- hawthorn *Crataegus monogyna*
- blackthorn *Prunus spinosa*
- box *Buxus sempervirens*
- hazel *Corylus avellana*

- willow species (*Salix spp.*).

The shrub parcels should be protected from browsing and grazing during early growth, this is considered unlikely to be a significant concern on this site, however, should indications of browsing or grazing species be noted then protective measures such as tree guards should be put in place. Any failures must be replanted on a like for like basis (both species and density).

Condition 4:

A lighting plan with several associated documents (LED spillage results, LED spillage iso contours a lighting report and lighting specifications) has been produced by Highlights floodlighting Ltd. And reviewed by Joshua Harwood.

The lighting specifications, spillage and contours **does not** meet requirements detailed within the bats and artificial lighting at night ILP guidance note[3] in regard to minimization and mitigation of lighting onto possible bat habitats. It should however be noted that in line with condition 8 of the planning conditions *"The external floodlighting hereby approved shall not be used between the hours of 21:30 and 09:00 daily."*. The hours of which the lighting must not be used will be in line with the bat active period with the heavy light usage being focused upon periods where any bats are roosting offsite (with the roost assessment determining no on-site trees to offer bat roosting suitability). In addition, rugby is considered to be a winter sport, with the majority of the sites (and as such lightings) usage being focused upon the late Autum, winter and early spring months.

The combination of timing and seasonality restrictions are believed to result in a negligible negative impact upon bat species (roosting, commuting and foraging) based upon the provided data.

Condition 5:

The previously mentioned Preliminary Roost Assessment & Bat Scoping Survey recommends no mitigation but does suggest the inclusion of native shrubs (addressed earlier within this report) and the inclusion of suitable bat boxes and access tiles within the new build.

The existing building and proposed extension are comprised of corrugated metal sheeting with skylights, as such bat access tiles are not considered to be suitable on this development, integrated bat boxes however can be positioned on the proposed sections of the building. A minimum of one bat box must be incorporated onto the new build, however additional boxes/features will provide an increase in site value to bat species. Examples of suitable locations of bat boxes are shown in Figure 2 and Figure 3 below, with an example of suitable boxes shown in Figure 4.

[3] Institute of Lighting Professionals & the Bat Conservation Trust (2023) *Guidance Note 08/23 Bats and Artificial Lighting at Night.*

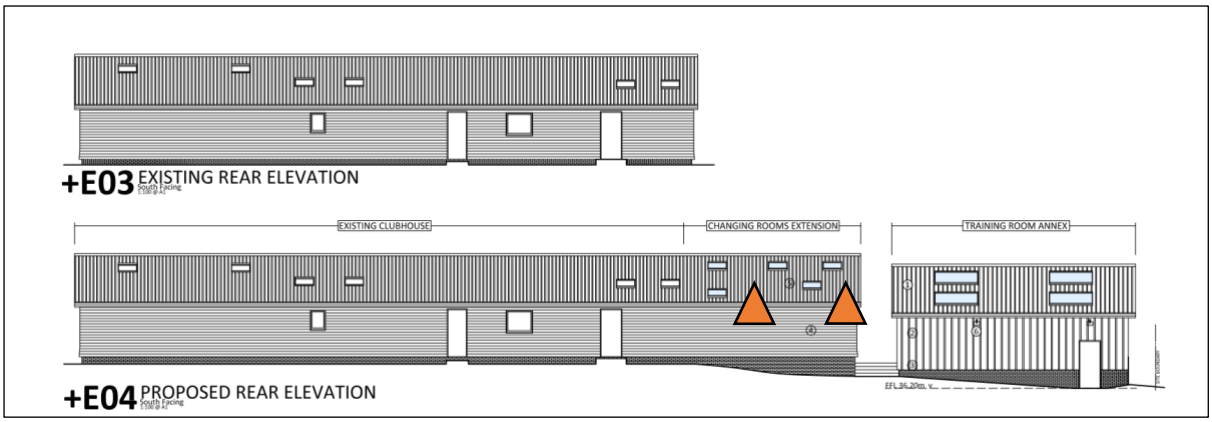

Figure 2. View of the existing and proposed elevations with areas of suitable bat boxes locations illustrated with an orange triangle. Image reproduced courtesy of COH surveyors, drawing number 837.17.61 revision F, dated 16th August 2022.

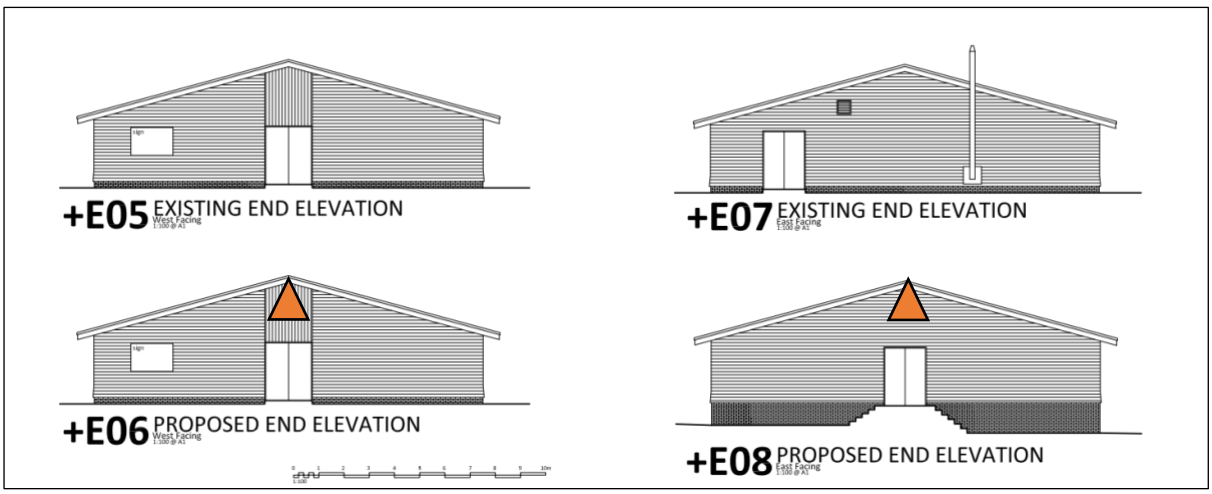

Figure 3. View of the existing and proposed elevations with areas of suitable bat boxes locations illustrated with an orange triangle. Image reproduced courtesy of COH surveyors, drawing number 837.17.61 revision F, dated 16th August 2022.



Figure 4. Left to right: Schwegler 2FR Bat Tubes, Beaumaris Woodstone Bat Box and the 1WI Schwegler Summer and Winter Bat Box, Nestbox company Integrated Eco Bat Box.

Bat boxes must be installed in line with suppliers' instructions, though typically this would ensure that there is sufficient height at instillation (no less than 3m from ground) and should not be obstructed by lighting or permanent objects that would obscure flight lines or make the box unsuitable. Integrated boxes are preferred due to the lack of removability and self-cleaning features. Should a bat box require inspection than a licensed surveyor must be required to do the inspection.

The condition also requires any ecological clerk of works (EcOW) that is required be appointed to an appropriately competent person. The Preliminary Roost Assessment & bat scoping survey did not detail any EcOW works, and no such works are believed to be required based on the scoping and emergence survey results. In the unlikely event a bat is found during works then all works must cease, and a suitably qualified ecologist contacted for further advice.

If you have any queries about the findings of this assessment, then please do not hesitate to contact me.

Kind regards,

Joshua Harwood

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