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Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report

Land at Rowfold Lodge

Executive Summary

Update December 2025

This report has been updated in response to consultation feedback from Place Services. Appendix 3 (Preliminary Bat Roost Assessment) has been substantially revised to provide enhanced clarity on individual building assessments, proportionate mitigation justification, and detailed implementation procedures for the Precautionary Method Statement and Wildlife Friendly Lighting Strategy.

This report presents the ecological baseline assessment for a 0.14-hectare site at Rowfold Lodge, Coneyhurst Road, Billingshurst, West Sussex, conducted in June 2025. The assessment supports a proposed residential development involving demolition of existing stables and construction of a single-storey dwelling with associated landscape enhancements.

Key Findings

Site Habitats: The site comprises modified grassland (0.0452ha), bramble scrub (0.0065ha), sparsely vegetated urban land (0.0346ha), developed land/buildings (0.0536ha), and non-native ornamental hedgerow (0.06km). All habitats are assessed as low to very low ecological value with poor to moderate condition.

Protected Species: No evidence of protected species was found on site. Desk-based records confirm notable species in the wider landscape including great crested newts (2016 records, 55 individuals at nearby ponds), hazel dormice (2022 monitoring records 1km away), and various priority bird and invertebrate species. However, significant dispersal barriers (A272) and lack of suitable habitat corridors effectively isolate the site from confirmed protected species populations.

Bat Assessment: Buildings assessed as negligible to low suitability for roosting with no evidence of occupation. Recent bat activity in the area is limited to a single common Pipistrelle record from 2020.

Biodiversity Net Gain: Current baseline delivers 0.255 habitat units and 0.060 hedgerow units. To achieve mandatory 10% BNG, the site requires 0.281 habitat units (+0.026) and 0.066 hedgerow units (+0.006). The report confirms significant enhancement opportunities through species-rich grassland creation, native scrub planting, and hedgerow replacement.

Designated Sites: No statutory or non-statutory designations within or immediately adjacent to the site. Nearest designations are Coneyhurst Cutting SSSI (geological, 700m) and two Local Wildlife Sites (750-950m distance).

Recommendations

- Precautionary working methods for building demolition
- Timing restrictions for vegetation clearance (avoid March-August breeding season)
- Pre-commencement ecological checks
- Implementation of proposed enhancement measures including native tree planting, wildflower meadow creation, and habitat complexity features
- 30-year management and monitoring plan for BNG compliance

The assessment demonstrates that while the site has limited current ecological value, substantial opportunities exist to deliver meaningful biodiversity net gain through thoughtful habitat creation and management.

Contents

Introduction

Background and Purpose

This Preliminary Ecological Appraisal (PEA), including an initial Biodiversity Net Gain (BNG) baseline has been prepared on behalf of Mr Andrew Rutherford, to inform proposed development at Land at Rowfold Lodge, Coneyhurst Road. The report supports the planning process by identifying the ecological value of the site and establishing a biodiversity baseline in accordance with current UK legislation and Horsham District Council requirements.

The aims of this report are to:

Undertake a Preliminary Ecological Appraisal (PEA):

- Complete an Extended UK Habitat Classification (UKHab) survey to identify and map all habitat types present on site.
- Assess the potential for the site to support protected and notable species, using both field survey and desk-based review of local biological records.
- Carry out a Preliminary Bat Roost Assessment (PRA) of buildings and structures on site to evaluate their suitability for roosting bats.

Establish the initial BNG baseline:

- Undertake habitat condition assessments (HCA) using quadrat-based botanical surveys and photographic evidence.
- Calculate the site's baseline biodiversity units using the statutory BNG metric, in line with current DEFRA and Natural England guidance.

Inform Planning and Design:

- Provide recommendations for further surveys, mitigation, and opportunities for ecological enhancement, ensuring the proposed development can achieve at least 10% net gain in biodiversity as required by planning policy.
- Present clear, robust baseline data to support planning applications and future ecological management of the site.

This report incorporates the results of the field survey, desk study, Preliminary Roost Assessment (PRA) of the wooden structures on site, habitat mapping, condition assessments, and BNG calculations. It is intended for use by the client, design team, and planning authority to guide the development process and support a successful planning application.

This PEA has been undertaken in accordance with CIEEM Guidelines for Preliminary Ecological Appraisal (2nd edition, 2017).

Following initial consultation with Place Services (Horsham District Council's ecological consultants), this report has been revised to provide enhanced detail on the Preliminary Bat Roost Assessment, as detailed in Appendix 3.

Site description

Rowfold Lodge (the site) is a small, semi-rural site located off Coneyhurst Road (A272) in Billingshurst, West Sussex, and falls within the Horsham District. The site is located at central National grid reference: TQ 09918 25433.

The site is contained within a clearly defined redline boundary of approximately 0.14 hectares and encompasses a mix of land uses and habitat types. The immediate landscape is characterised by modified grassland, ornamental hedgerows, bramble scrub, and mixed scrub, as well as a variety of built features and existing developed land.

The site itself currently contains a group of former stables and outbuildings set around hardstanding and amenity areas. These buildings previously benefited from Class Q permitted development approval for residential conversion and are of largely utilitarian design, constructed from materials such as corrugated concrete and timber cladding.. The proposed development involves the demolition of the existing stabling and Class Q-approved structures and the erection of a new single-storey dwelling, along with associated access, parking, and landscape enhancements.

Surrounding land use remains predominantly agricultural, with adjacent pasture and arable fields, small woodland blocks, and isolated residential properties along rural lanes. There are no designated ecological or statutory nature conservation sites in the immediate vicinity, and the site lies outside of any conservation area or listed building constraints, in line with relevant planning documentation.

The approximate red line boundary of the site and the immediate surrounding area are shown in Figure 1.

Figure 1 Approximate location of the red line boundary and immediate surroundings, based on Google Earth Pro imagery dated 14 May 2024 (image captured July 2025).

Proposed development

The ‘proposed development’ involves the demolition of all existing stabling and the previously approved Class Q dwelling on site, totaling a footprint of 151m². In their place, a new single-storey residential dwelling with a footprint of 136.8m² will be constructed, designed in a sympathetic rural vernacular using feather-edge timber cladding, facing brickwork, and Spanish roofing slates. The proposal includes a new package treatment plant, an air source heat pump, a designated parking area, and bin collection and storage facilities. Existing vehicular access from Coneyhurst Road will be retained. The landscape will be significantly enhanced with new tree planting, meadow grass

seeding, and the establishment of peripheral native scrub to form a dedicated Biodiversity Net Gain (BNG) area, ensuring measurable improvements to site ecology and integration into the surrounding environment.

Figure 2 shows the redline boundary and proposed outline design for the proposed development which is still subject to change.

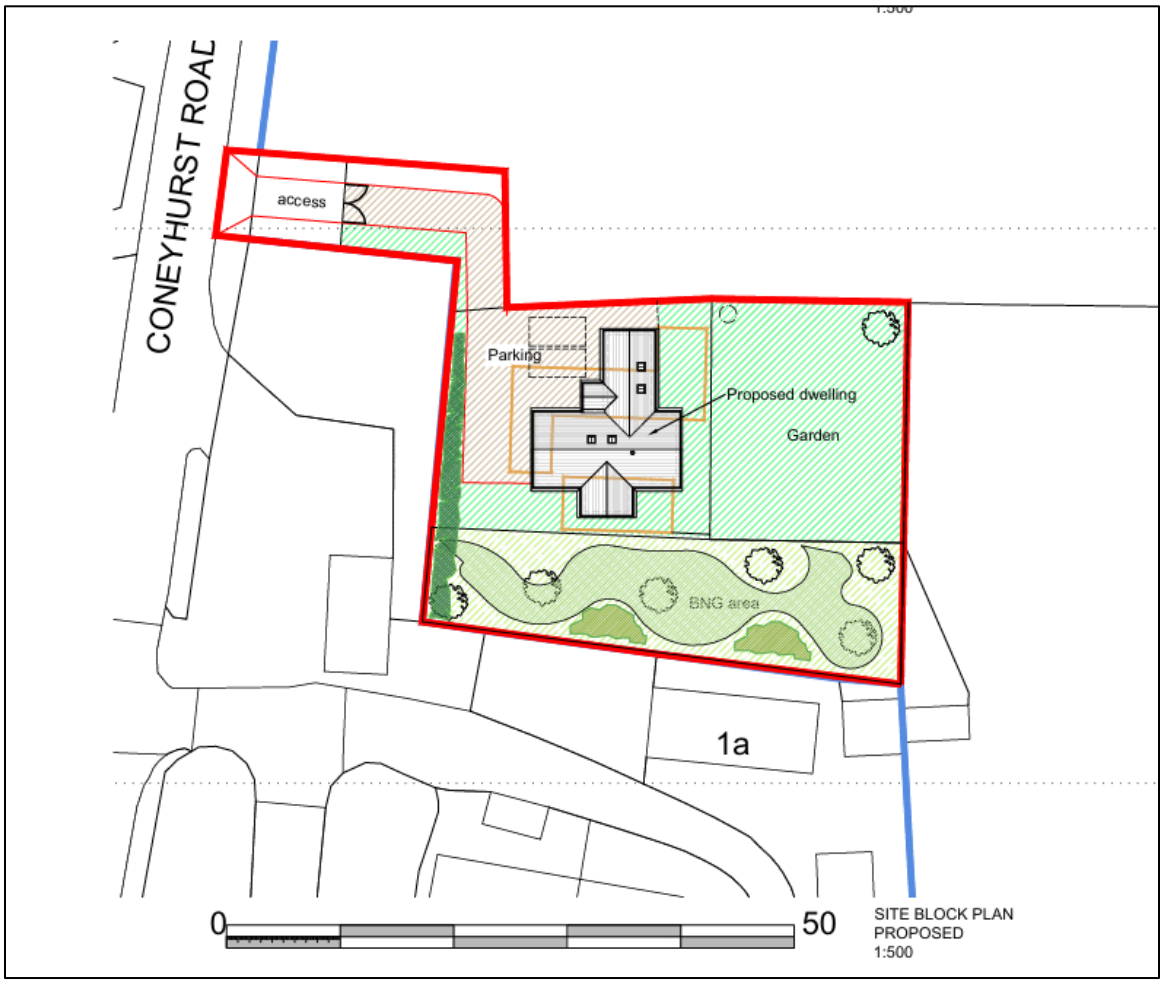

Figure 2 Proposed Development outline design.

Relevant Planning Policies and Legislation

The site was surveyed to assess its ecological value and to ensure the proposals were compliant with relevant planning policy and legislation. Policy guidance is provided by the National Planning Policy Framework (NPPF 2024) as well as the Horsham District Planning Framework (2015). These policies included the following which are considered relevant to ecology, biodiversity, and nature conservation:

Horsham District Planning Framework (2015)

- Policy 24: Environmental Protection – Ensures that development does not have an unacceptable impact on the environment.
- Policy 25: The Natural Environment and Landscape Character – Requires the conservation and enhancement of the natural environment and landscape character.

- Policy 26: Strategic Countryside Protection – Protects the countryside from inappropriate development.
- Policy 31: Green Infrastructure and Biodiversity – Promotes the retention, protection, and enhancement of biodiversity and green infrastructure.
- Policy 37: Sustainable Construction – Encourages sustainable design and construction methods that support environmental objectives.

Wildlife and Countryside Act 1981 (as amended)
The Wildlife and Countryside Act 1981 remains the principal legislation for wildlife protection in Great Britain, providing statutory safeguards for wild animals, plants, and habitats, and underpinning the designation and protection of Sites of Special Scientific Interest (SSSIs). The Act also governs the management of public rights of way and the amendment of the Definitive Map and Statement in West Sussex. Recent amendments, introduced through Section 111 of the Environment Act 2021 and in force since September 2022, have expanded the licensing regime under Section 16 of the Act. Licences for activities affecting protected species can now be issued for reasons of overriding public interest, provided there is no satisfactory alternative and the action will not be detrimental to the survival of the species concerned. The maximum validity period for such licences has also been extended to five years, providing greater flexibility for long-term projects. These changes facilitate development activities while maintaining robust protection for wildlife, and all relevant works at the site will be undertaken in accordance with the latest requirements of the Act and associated guidance.

Conservation of Habitats and Species Regulations 2017
The Conservation of Habitats and Species Regulations 2017 (as amended) transpose the EU Habitats and Birds Directives into UK law, ensuring the continued protection of European Protected Species (EPS) and the designation and management of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) following Brexit. The Regulations set out the process for Appropriate Assessment of plans or projects that may affect these sites, and remain a key mechanism for the conservation of habitats and species of European importance across the UK. The Regulations have been updated to reflect changes in domestic policy, but the core requirements for protecting designated sites and species remain unchanged. All relevant ecological assessments and any required mitigation or licensing at the site will be undertaken in accordance with these Regulations and the latest Natural England guidance.

Environment Act 2021 (Biodiversity Net Gain requirement)
The Environment Act 2021 has introduced a mandatory requirement for most new developments in England to deliver at least 10% Biodiversity Net Gain (BNG) compared to the pre-development baseline, as measured by the statutory biodiversity metric. This requirement became effective for major developments from 12 February 2024 and was extended to small sites from 2 April 2024. All BNG measures must ultimately be secured for a minimum of 30 years through legal agreements such as Section 106 obligations or conservation covenants, and planning applications must be supported by a Biodiversity Gain Plan at the appropriate stage.

This report provides a BNG baseline assessment only. The baseline establishes the existing biodiversity value of the site using the statutory metric, in line with current legislation and Horsham District Council policy, and does not set out the final BNG proposals or management commitments. The baseline figures presented here will inform the development of detailed design and the preparation of a full Biodiversity Gain Plan, which will be required at the post-consent stage to demonstrate how the minimum 10% net gain will be achieved and maintained for at least 30 years, in accordance with statutory requirements.

The baseline assessment ensures that the planning process is informed by robust, up-to-date ecological data and provides the necessary foundation for future BNG planning, management, and monitoring as the proposed development progresses.

Methodology

Desk Study

A desk study was undertaken, June 2025, to provide a comprehensive overview of the ecological context of the site and its surroundings, and to inform the scope of the field survey and assessment. The desk study aimed to identify:

- Statutory and non-statutory designated sites within the zone of influence,
- Records of protected and notable species,
- Priority habitats and ecological networks relevant to the site.

Data Sources and Search Areas

Sussex Biodiversity Record Centre (SxBRC)

Ecological data were obtained from SxBRC, the principal environmental record centre for East and West Sussex, including the Horsham district. SxBRC collates data from local recorders, ecological consultants, and the public, ensuring a comprehensive and up-to-date biodiversity dataset.

The data request included:

- Protected and notable species records within a 1km radius of the site boundary
- Bat records within a 1km radius
- Bird records within a 1km radius
- Invasive species records within a 1km radius
- Statutory designated sites within a 2km radius
- Non-statutory designated sites and Section 41 (Priority Habitats) or other notable habitats, within a 1km radius of the site.

Desk study data on protected and notable species was limited to records from the last ten years to ensure relevance and accuracy for the current assessment. Other data sources included:

- **MAGIC Map (Multi-Agency Geographic Information for the Countryside)** National datasets on statutory sites, habitats, and environmental constraints were reviewed to supplement local records and provide context on landscape-scale ecological features.
- **Aerial Imagery & Ordnance Survey Mapping** Recent aerial photography and OS mapping were used to assess current land use, habitat connectivity, and the wider landscape context.
- **Planning Portal and Local Authority Records** Relevant planning history and previous ecological assessments for the site and adjacent land were reviewed where available.
- **Horsham Green Infrastructure Strategy (2024):** The site was checked against the Horsham District Green Infrastructure Strategy and associated mapping to identify whether any part of the land falls within areas of high or medium strategic significance, such as Biodiversity Opportunity Areas, river corridors, or designated green infrastructure networks.
- **Local Significance and Policy Documents:** Additional reference was made to the Wilder Horsham District Nature Recovery Network (NRN) mapping and any relevant local

plans or supplementary planning documents to ensure the assessment aligns with local ecological priorities and planning requirements

The desk study ensured the appraisal was informed by the most current and comprehensive biodiversity data available, supporting robust assessment of ecological constraints and opportunities in line with CIEEM (2017) and best practice.

Field Survey

A walkover survey was conducted on 6 June 2025 to undertake a walkover, habitat condition assessment and to assess the structures on site for bat suitability, in accordance with the CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, completed in the optimal survey period. Surveys were undertaken by suitably qualified ecologists with experience in habitat assessment and protected species evaluation, and in suitable weather conditions to maximise detectability.

Weather conditions during the site walkover:

- Weather: broken cloud (20%), dry, Beaufort 2, 19–21 °C.
- Visibility: excellent (>1 km) enabling clear identification of field characters.
- Precipitation: none during survey period

Habitats were classified using the latest UK Habitat Classification system (UKHab v2.01). This hierarchical and standardised approach supports detailed baseline habitat assessment and aligns with Biodiversity Net Gain (BNG) metric requirements.

Survey methodology included:

- Systematic mapping of all habitat types and features using GPS-enabled devices and Coreo (2025) in the field app.
- Assessment of habitat condition, structure, and species composition for each habitat parcel.
- Quadrat's were used in each habitat parcel and a DAFOR scale[1] was applied to determine the presence of each species within the quadrat.
- Identification and recording of features with potential to support protected and priority species (e.g., mature trees, hedgerows, ponds, buildings, log piles).
- Direct observation and habitat suitability assessment for protected and notable species, considering both field evidence and desk study records.
- Use of photographic records and detailed target notes to document key habitats, features, and any signs of species presence (e.g., tracks, droppings, nests).
- Assessment of habitat connectivity and potential ecological corridors within and adjacent to the site.

Where access was restricted or visibility limited, this was noted, and the potential implications for survey completeness were assessed.

[1] The DAFOR scale (Dominant, Abundant, Frequent, Occasional, Rare) provides a semi-quantitative estimate of vegetation presence and distribution.

BNG Assessment

The statutory biodiversity metric was used to calculate baseline biodiversity units for the site, in line with current national requirements and Horsham District Council policy.

- Habitats were mapped and classified using UKHab v2.01 to ensure compatibility with the statutory metric.
- Each habitat parcel was assigned a unique reference, and its area, distinctiveness, condition, and strategic significance were assessed according to the metric's criteria and local planning priorities.
- Baseline calculations were based solely on habitats present at the time of survey, prior to any development or enhancement proposals.
- The baseline unit values provide a quantifiable measure of the site's existing biodiversity value and form the reference point for future BNG assessments.

BNG Requirements

BNG was calculated using the statutory biodiversity metric, which categorises habitats into distinctiveness tiers (very high to low) and assesses strategic significance. Loss of "very high" distinctiveness habitats (e.g., lowland meadows) requires bespoke compensation plans.

Strategic Habitat Significance

Habitats are evaluated based on their ecological value and location:

- High Strategic Significance: Areas identified within Horsham's Green Infrastructure Strategy (2024), including Biodiversity Opportunity Areas, river corridors, and designated sites. These locations are mapped as core components of the district's ecological network, providing essential habitat for wildlife, supporting ecosystem services, and forming the backbone of landscape-scale ecological connectivity.
- Medium Strategic Significance: Priority habitats mapped within the Wilder Horsham District Nature Recovery Network (NRN), which identifies biodiversity-rich zones and potential corridors for ecological connectivity. These areas play a key role in linking core habitats, facilitating species movement, and enhancing the resilience of the wider ecological network, but are not themselves designated as core sites.
- Low Strategic Significance: Habitats or features not identified as priorities within local or national nature recovery strategies, such as Nature Recovery Networks, Biodiversity Opportunity Areas, or Green Infrastructure corridors. Typically, these are isolated, fragmented, or heavily modified areas with limited species diversity or ecological function, offering little contribution to landscape-scale connectivity or ecosystem resilience, and not mapped as part of ecological corridors or buffer zones for priority habitats or protected sites.

To determine whether the habitats present on site were of High, Medium or Low significance these local strategy documents were reviewed as part of the desk based assessment.

Preliminary Bat Roost Assessment

The daytime bat walkover incorporating PRA was completed on 6 June 2025 and comprised a detailed inspection of the proposed development area through direct internal and external access affording close examination of potential bat entry/exit points, potential roosting sites and evidence

of occupation (droppings, dead bats etc.). General resources for bats such as commuting and foraging habitat and wider habitat connectivity were also reviewed.

The PRA was completed in line with current best practice by a professionally competent ecologist with extensive experience in bat survey methodology, having conducted PRA assessments for over 14 years in accordance with established professional standards

Quality Assurance

All survey work and data analysis were subject to internal quality assurance procedures, including review by a senior ecologist. The methodology was designed to meet or exceed the requirements of CIEEM, DEFRA, Natural England, and Horsham District Council.

Limitations

Although several survey visits were completed to increase the reliability of the ecological assessment, it is important to acknowledge that no amount of survey effort can fully capture the complete use and occupation of a site by all species throughout the year. Multiple visits improve confidence in the findings by allowing for a broader snapshot of seasonal activity and species presence, but ecological systems are inherently dynamic and subject to change. As such, there remains the possibility that some species or ecological interactions were missed, and the assessment provides only a general indication of the site's ecological value at the times surveyed. Further or ongoing surveys may be required to address specific uncertainties or to capture additional seasonal or transient ecological activity.

Data validity

Unless otherwise stated, this report will remain valid for a period of 24 months from the date of the last survey. Beyond this date, update works/surveys may be required and following CIEEM's advice note: On the Lifespan of Ecological Reports and Surveys (2019).

Results

Desk Study Results

Designated Sites

Statutory Designations

One statutory designated site (SSSI) is present within 1km of the site:

- Coneyhurst Cutting SSSI - a small geological SSSI located approximately 700m east of the site. This SSSI covers geological interest rather than ecological habitat and does not overlap or lie adjacent to the site boundary.

No other statutory designations (SAC, SPA, NNR, LNR, Ramsar) are present within 2km of the site, as confirmed by SxBRC and the MAGIC Map.

Non-Statutory Designations

Two Local Wildlife Sites (LWS) are present within a 1km search radius, but neither overlaps the site:

- Wilden's Meadow LWS (H14): A mosaic of grassland, woodland, and ponds notable for great crested newt, approximately 750m northeast of the site.
- Rosier Wood LWS (H28): Ancient semi-natural woodland supporting diverse flora and notable species, approximately 950m southeast of the site.

No Local Geological Sites (LGS) or other non-statutory designations occur within or adjacent to the site according to SxBRC and local datasets.

The site does not intersect with mapped Biodiversity Opportunity Areas, river corridors, or Nature Recovery Network corridors of medium or high strategic significance, as confirmed by the Horsham Green Infrastructure Strategy (2024).

Priority Habitats and Species Records

The findings, summarised in Table 1, highlight the presence of key habitats such as deciduous and ancient woodland, as well as records of protected species including bats and birds. Additionally, several Section 41 Priority species were identified.

Table 1 Summary of Priority Habitats, Protected Species, and Other Notable Section 41 Species Recorded Within or Adjacent to the Site and Within a 1km Radius

Category	Feature/Species	Details / Records
Section 41 Priority Habitats	Deciduous woodland, Ancient woodland, Traditional orchard	All present in the wider landscape (Wilden's Meadow LWS, Rosier Wood LWS, orchards mapped within 1km); not within the site itself
Protected & Notable Species		
Amphibians	Great crested newt, Common toad, Smooth newt, Common frog	GCN: 4 records (2016), up to 55 individuals, in Billingshurst/LWS ponds ~600m+ from site; Common Toad: 2 records (2002–2009); Smooth Newt & Common Frog: 2002. No aquatic habitat on-site.

Category	Feature/Species	Details / Records
Reptiles	Slow-worm, Grass snake, Adder, Common lizard	All species protected under WCA & S41; local (but not on site) records, most recently slow-worm (2014)
Mammals	Hazel dormouse, Hedgehog	Hazel Dormouse: 7 records (2022) ~1km from site (nests, prints, live); Hedgehog: 2 records (2017–2018), up to 6 present, within 1km; not on site
Bats	Common pipistrelle, Soprano pipistrelle, Brown long-eared bat, Myotis spp.	Common pipistrelle: 2020 record at Palmer's Farm (1.5km), 10 records (2020 and prior) in 1km; other species detected in the wider area; no known roosts on site
Birds (Schedule 1/Red/Amber/List/S41/Notable)	Red kite, Marsh harrier, Barn owl, Goshawk, Hen harrier, Kingfisher, Hobby, Sparrowhawk, Buzzard, Kestrel, Lapwing, Skylark, Linnet, Yellowhammer, House martin, Swallow, Nightingale, Marsh tit, House sparrow, Spotted flycatcher, (many more)	Dozens of records in past decade; Red kite: annual since 2015, last 2024; Barn owl: regular, last 2023; Skylark, Linnet, House sparrow, Spotted flycatcher, Yellowhammer, Marsh tit all S41/Red/Amber; see records for full list of 70+ notable species
Higher Plants (Section 41, Red List, Sussex Rare, etc.)	Bluebell, Wild strawberry, Rye brome, Narrow-leaved bitter-cress, Field scabious, Stinking chamomile, Wood-sorrel, Ragged-robin, Devil's-bit scabious, Dwarf spurge, Corn mint, Tormentil, Upright goosefoot, Greater butterfly-orchid, Sanicle, Pale toadflax, Heath speedwell	Bluebell: 17 records, last 2023; Wild strawberry: 8 records, last 2023; Rye brome & Stinking chamomile: national & Sussex rarities (last 2010, 2009); Narrow-leaved bitter-cress, Field scabious: recent NT records 2020, 2024; many species scarce or declining in the wider area
Lepidoptera & Invertebrates	Brown hairstreak, Small heath, Purple emperor, White admiral, Grizzled skipper, Dingy skipper, Small blue, Stag beetle, Scarlet chaser, Cinnabar moth, Long-horned bee, Hornet hoverfly	Stag beetle: 3 records 2021–2023; Brown hairstreak: 23 records, last 2024; Small heath: 82 records, last 2024; Purple emperor, White admiral, Grizzled skipper, Dingy skipper: 2020–2024 records, mainly on surrounding transects/woodland edges; all Section 41, some with WCA Sch5 or Sussex Rare status

Field Survey Results

Habitats

There were five distinct habitats recorded across the site, a habitat map showing the location and distribution of habitats is provided in Appendix 1. Table 2 provides a summary of the habitats found across the site, a description and justification for the habitat classification according to UKHab and BNG requirements, the habitat condition, total area in hectares (ha) and where applicable species lists are provided along with a DAFOR scale score based on the distribution of species within quadrats that were surveyed in each habitat parcel.

Table 2 UKHab habitat descriptions for the site including defining species compositions.

Habitat Type (UKHab Code)	Area (ha)	Condition	Habitat Photo	Description/ Justification	Plant Species (combined list of quadrats)
Habitats					
Modified Grassland (g4)	0.0452	Poor		The grassland at the site is classified as modified grassland, based on its species composition, structure, and visible management. Quadrat surveys recorded dominance by perennial ryegrass (Lolium perenne), with frequent Yorkshire fog (Holcus lanatus), rough meadow grass (Poa trivialis), creeping thistle (Cirsium arvense), creeping cinquefoil (Potentilla reptans), and white clover (Trifolium repens). This sward is typical of agriculturally improved land, showing low botanical diversity and a strong presence of competitive grass species associated with past grazing or cutting. The general appearance, as seen in site photos, is of a uniform, tightly grazed or mown grassland with occasional ruderal species and little structural or floral variation. For Biodiversity Net Gain (BNG) purposes, this parcel is assessed as modified grassland in poor condition, reflecting its low habitat distinctiveness, dominance by sown or persistent pasture species, limited forb diversity, and clear signs of past or ongoing management not geared to nature conservation.	Perennial ryegrass (Dominant), Yorkshire fog (Abundant), Rough meadow-grass (Frequent), White clover (Frequent), Creeping thistle (Occasional)

Habitat Type (UKHab Code)	Area (ha)	Condition	Habitat Photo	Description/ Justification	Plant Species (combined list of quadrats)
Bramble Scrub (h3h)	0.0065	N/A		Bramble scrub occurs extensively along the boundary of the old riding school paddock and in several spots between the stable structures on site. This habitat is characterised by dense, arching stands of bramble (Rubus fruticosus agg.) that form cohesive thickets, creating areas of impenetrable cover and tangled growth. The scrub consists of vigorous new shoots mixed with mature woody stems, offering a range of heights and a continuous leafy canopy throughout the growing season. Its location provides valuable ecological functions, acting as a wildlife corridor along the site perimeter and offering food, shelter, and nesting resources for birds, invertebrates, and small mammals in these marginal and transitional parts of the site. Bramble scrub's presence in these areas reflects limited management and natural colonisation, enhancing both the site's structural diversity and biodiversity potential.	Bramble

Habitat Type (UKHab Code)	Area (ha)	Condition	Habitat Photo	Description/ Justification	Plant Species (combined list of quadrats)
Developed Land Sealed Surface (u1b5/6) – including buildings Build Linear features (u1e)	0.0536	N/A		The buildings on site comprise single-storey, timber-framed former stables and outbuildings arranged in a linear formation alongside the old paddock. Their exterior is clad in black-painted horizontal timber weatherboarding, some of which shows weathering and localised wear, and topped with shallow-pitched, corrugated cement-fibre sheeting roofs. Gutters are fitted but display a build-up of moss and some distortion from long-term exposure. Internally, the roof structure features exposed timber rafters and purlins supporting the corrugated sheets, with visible surface-mounted electrical cabling and simple light fittings. The interior space is open, divided by sections of timber partitioning and metal mesh that once formed animal stalls or storage bays. Floors are a combination of compacted earth, concrete and rough hardstanding, with various pieces of timber and metal stored along the sides. Open frontages and wide doorways provide direct access and ventilation, while small windows or apertures allow limited natural light into the otherwise enclosed space. Overall, these utilitarian buildings are typical of rural stable blocks: they are functional and robust but clearly exhibit signs of aging and basic agricultural construction, making them suited to storage or animal shelter rather than modern occupation or sensitive use.	N/A
Sparsely vegetated urban land (u1f)	0.0346	Moderate		The sparsely vegetated ground in the former sand school area is best described as an ephemeral and early successional habitat, rather than true grassland. The substrate is predominantly bare or only partially colonised, with scattered tufts and patches of grass, mainly Yorkshire fog (Holcus lanatus), sweet vernal grass (Anthoxanthum odoratum), and perennial ryegrass (Lolium perenne). Ruderal species are frequent, and among the colonising vegetation are young saplings of grey willow (Salix cinerea) and white poplar (Populus alba), with bramble (Rubus fruticosus agg.) also spreading into the area. The overall structure is highly uneven, with significant areas of exposed ground and relatively low plant diversity, reflecting both the site's legacy as an equestrian sand-based arena and ongoing disturbance around the adjacent buildings. This combination of incomplete vegetative cover, prevalence of pioneer or disturbance-tolerant species, and visible succession by woody plants justifies classifying the area as sparsely vegetated ground (including ephemeral/short perennial habitat) rather than as established grassland. Vegetation has yet to develop into a continuous sward, and ongoing disturbance inhibits the establishment of a stable, species-rich grassland community.	Yorkshire fog Sweet vernal grass Perennial ryegrass Grey willow (young saplings) White poplar (young saplings) Bramble

Habitat Type (UKHab Code)	Area (ha)	Condition	Habitat Photo	Description/ Justification	Plant Species (combined list of quadrats)
Hedgerows					
Non-native ornamental hedgerow (h2b)	0.06	Poor		The hedgerow features at the site comprise two distinct non-native ornamental hedgerows that justify classification under UK Habitat Classification category h2b. The entrance hedgerow is dominated by conifer trees, most likely Leylandii (Cupressocyparis leylandii). The southern boundary represents a poorly established ornamental planting that exhibits sparse coverage, stressed appearance, and limited vertical development, characteristic of hedgerows that have experienced establishment failures due to factors such as poor site preparation, inadequate aftercare, or unsuitable growing conditions. According to UKHab guidelines, a hedgerow qualifies as non-native and ornamental (h2b) when it contains more than 20% canopy cover of UK non-native woody species. The entrance hedgerow clearly exceeds this threshold with its dominant conifer composition, while the southern boundary represents an intended ornamental planting that has not successfully established. Both features therefore appropriately classify as non-native ornamental hedgerows under the UKHab system, regardless of their current condition or establishment success.	Leylandii

Protected and Priority Species

Badgers

No badger setts, either active or inactive, were observed during the field survey. Additionally, there were no signs of badger activity recorded across the site, such as latrines, footprints, hair, or foraging evidence, which are typical indicators of presence and use. The site provides limited suitable foraging habitat, with some potential along the southern and eastern boundaries where dense bramble scrub forms part of the site perimeter. However, the modified grassland, developed land, and sparsely vegetated areas offer little value for badger foraging or commuting.

The remainder of the site consists of former stables and hardstanding, which offer negligible habitat value for badgers. These areas are unsuitable for sett creation due to compacted surfaces and lack of loose, diggable soil necessary for badger excavation. More suitable habitat for sett creation, characterised by dry, sandy, or friable soils that facilitate digging, is likely present off-site in nearby woodland, hedgerows, or dense patches of scrub within the wider landscape. Given the site's small size and predominant developed land use, it is assessed as providing negligible value for badger populations.

Bats

Desk-based data from the SxBRC indicate limited recent bat activity within 1km of the site. Only one bat species record exists from the past 10 years.

A PRA was conducted on the former stables and outbuildings within the site following current best practice guidelines. The buildings demonstrate negligible suitability (hay barn) to low suitability (stable block) for roosting bats due to weathered timber cladding with multiple potential access gaps, stable construction, and proximity to suitable foraging habitat. However, comprehensive internal and external physical inspection revealed no evidence of current or historic bat use, including no droppings, staining, feeding remains, or other occupation signs.

Given the limited recent bat activity in the locality and the absence of current occupation evidence, precautionary working methods are still recommended for any development work, particularly during demolition of timber-clad structures. The site boundaries, including scrub and hedgerows, provide potential foraging and commuting habitat for bats, though recent activity appears to be very limited.

Further details on the site PRA are provided in Appendix 3.

Birds

Recent desk-based records from the SxBRC show no specific protected bird records from within the site boundary over the past 10 years. However, the wider area continues to support notable species including barn owl (last recorded in 2023), various raptors, and farmland passerines, though these are recorded at distances of 1km or more from the site.

On site, the mosaic of modified grassland, trees, scrub, and outbuildings provides suitable nesting and foraging habitats for a range of common bird species. No active nests were recorded during the survey.

Precautionary measures will be required if vegetation clearance or building demolition occurs during the bird breeding season (March to August inclusive). Recent records suggest the site has limited value for protected or notable bird species but supports common farmland and garden birds.

Dormice

A review of desk-based records from the SxBRC shows seven records of hazel dormice from 2022, all from approximately 1km from the site at monitoring locations in Billingshurst. These are the most recent records within the search area, indicating active local populations under monitoring.

On-site habitat assessment found that the site consists primarily of modified grassland, scattered trees, bramble scrub, and former stabling buildings. The woody habitat present is fragmented and limited in extent, with no continuous, well-developed native hedgerows, species-rich scrub, or extensive broadleaved woodland, features typically associated with suitable dormouse habitat. The non-native ornamental hedgerows on site, dominated by Leylandii and poorly established ornamental planting, do not meet the criteria for dormouse habitat, which requires species-rich hedgerows that are wide (ideally >3m), tall, and uncut for two or more years.

Despite the confirmed presence of dormice in monitoring boxes approximately 1km away, the site is assessed as highly unlikely to support this species due to habitat limitations and isolation from suitable habitat networks.

Great crested newt (GCN)

Desk data returned four GCN records from 2016, the nearest being 600 m south-east of the site where 55 individuals were counted. Mapping confirms seven ponds within 250 m of the red-line boundary; however, none possess functional terrestrial corridors to the site. The closest pond (50 m west) is isolated by the busy A272, a likely barrier to amphibian dispersal to the site. A second pond lies 70 m north but is separated by two access roads and intensively managed grassland, while the remaining ponds (>100 m south) sit within woodland blocks divided from the site by grazed pasture.

The site itself offers no aquatic habitat and is dominated by hardstanding and short-mown grassland with only small bramble patches for cover. Given the physical barriers, absence of linkage, and sub-optimal on-site conditions, the likelihood of great crested newt presence is very low.

Invertebrates

Recent records (2017-2024) from the wider area include several conservation priority species, though none have been recorded on the site itself. The site is likely to support common invertebrate species within grassland and scrub habitat areas.

Reptiles

There are no desk-based records of reptiles within 1km of the site from the past ten years, and no historical records of protected or notable reptile species in the immediate area. On-site habitats are dominated by modified grassland, hardstanding, and former stabling buildings, with some limited bramble and scrub. These features provide only marginal habitat for widespread reptile species such as slow worm or common lizard.

Reptiles require specific habitat features for basking, foraging, and hibernation, including south-facing banks, tussocky grassland, log piles, stone walls, and areas of varied vegetation structure. The site lacks these key habitat features, particularly south-facing banks, extensive unmanaged areas, or refugia suitable for reptile use. The current management and structure of the habitats, combined with regular disturbance and limited refugia, mean that the site is assessed as unlikely to support significant reptile populations.

No reptiles or field signs (such as sloughs or basking individuals) were observed during the site visit. The modified grassland is maintained and lacks the tussocky structure preferred by reptiles, while the developed areas provide no suitable habitat. No further survey is recommended for

reptiles however vegetation clearance should be completed sensitively and methodically, towards boundary habitat features, to allow any reptiles, in the unlikely event that they are present, to move away from the working areas unharmed.

Invasive Non-native species

The SxBRC data search identified 14 invasive non-native species (INNS) records within 1km of the site, including several of statutory concern.

No invasive non-native plant species were recorded on site during the field survey, and no evidence of INNS was observed in any habitat parcel. Routine vigilance for INNS is recommended as part of ongoing site management, particularly if ground disturbance or habitat creation is planned.

Other Notable species

The only protected terrestrial mammal recorded within 1km is the hedgehog (Erinaceus europaeus; NERC S41, UK BAP Priority, Red List Vulnerable), with a single record from 2005. No hedgehogs or field signs (such as tracks or droppings) were observed during the site visit, and the current site structure offers only limited foraging or nesting opportunities for this species.

No records of other notable terrestrial mammals, amphibians, or other protected fauna were returned from the data search, and no evidence of their presence was found during the survey.

Biodiversity Net Gain (BNG) Assessment

Baseline Habitat Units

The baseline value of the site was calculated using the latest DEFRA Statutory Biodiversity Metric, with results finalised on 19 July 2025. The current on-site baseline value is 0.255 habitat units across all mapped areas. The baseline includes a mosaic of low to medium distinctiveness habitats, all in poor or moderate condition and with low to very low strategic significance. No irreplaceable habitats are present within the baseline assessment

Table 3 provides an overview of the Statutory BNG metric for habitat units.

Table 3 Baseline Habitat Units Summary, including the urban features.

Broad Habitat	Habitat Type	Distinctiveness	Condition	Strategic Significance	Total Area (ha)	Habitat Units
Urban	Built linear features	Very Low	Not applicable	Low	0.031	0.000
Urban	Developed land; sealed surface	Very Low	Not applicable	Low	0.022	0.000
Grassland	Modified grassland	Low	Poor	Low	0.045	0.090
Sparsely vegetated / Ephemeral	Ruderal/Ephemeral	Low	Moderate	Low	0.035	0.138
Heathland and Shrub	Bramble scrub	Medium	N/A (scrub)	Low	0.007	0.026
Total					**0.140**	**0.255**

- No individual trees or woodland features are present as reportable habitat parcels.
- No watercourses or wetland habitats are present at baseline.
- Non-native and ornamental hedgerows are assessed separately in the statutory BNG metric (see Hedgerows section).

A baseline habitat map is provided in Appendix 1 and an example of the headline results of the Statutory BNG metric are provided in Appendix 2. Condition assessments for each habitat feature has been completed and are provided separate to this report, along with the BNG Statutory Biodiversity Metric calculation showing baseline and post development habitat improvement.

To meet the mandatory 10% BNG uplift, the site must deliver a minimum of 0.281 habitat units post-development (rounded to three decimals), equating to a net gain target of 0.026 units above baseline. The headline results from the Statutory BNG metric are provided in Appendix 2.

Baseline Hedgerow Units

The baseline assessment for hedgerows on the site records a total of 0.060 km (60 metres) of non-native and ornamental hedgerow, all of which is classified as having very low distinctiveness under the DEFRA Statutory Biodiversity Metric. These hedgerows comprise the conifer-dominated line at the entrance and the poorly established ornamental planting along the southern boundary. The combined total delivers 0.060 hedgerow units at baseline.

To achieve BNG compliance, an increase to 0.066 hedgerow units (a minimum 10% uplift) would be required. The DEFRA metric trading summary confirms that the project triggers a unit shortfall for hedgerows, and compensatory measures will need to address this deficit to meet statutory requirements.

Post development BNG

The proposed habitat enhancement and creation on the site results in habitat gain of 32.89% with 0.08 units delivered and hedgerow unit gain of 93% with 0.06 hedgerow units delivered. Headline result extracts are provided in Appendix 2 and the proposed habitat improvements are displayed in Appendix 4.

Preliminary Bat Roost Assessment

The results of the PRA are provided in Appendix 3.

Ecological Constraints and Opportunities

Constraints

Bats

Recent desk-based records indicate only a single modern bat record within 1.5km of the site, specifically a common Pipistrelle (Pipistrellus pipistrellus) identified at Palmer's Farm in 2020. All other bat records for the local area are over a decade old, and there are no known roosts or significant populations documented directly within or immediately adjoining the site since 2010. Site inspections of the existing timber stables and outbuildings confirmed negligible to low suitability for bat roosting, with some minor physical features such as weathered cladding and potential gaps. However, thorough internal and external surveys produced no evidence of past or current bat occupation, no droppings, feeding remains, staining, or other characteristic field signs were found. Site boundaries (scrub and hedgerow) may act as minor commuting or foraging corridors, but ongoing activity appears to be very limited. As a result, the constraint for the proposed development relates to the necessity of precautionary working methods during any demolition, particularly for timber roof and wall removal, and the recommendation of a pre-works bat check if there is a significant delay before development proceeds. External lighting should be restricted and directed away from any boundary vegetation or new wildlife features.

Birds

The site is within a landscape supporting an exceptionally diverse bird community, with regular records of priority and notable species, including raptors such as red kite, buzzard, sparrowhawk, and kestrel, as well as a range of Red and Amber List, Section 41, and Sussex notable species. Recent records include confirmed barn owl presence as recently as 2023, plus extensive observations of farmland and woodland specialists such as skylark, linnet, yellowhammer, house sparrow, starling, and song thrush. The site itself comprises somewhat limited habitat, mainly modified grassland, bramble scrub, boundary ornamental trees, and a cluster of utilitarian buildings. All vegetation clearance or demolition should be conducted outside the breeding season (March to August), or preceded by a nesting bird check by a qualified ecologist within 48 hours, if this is not possible. The main constraint is that works must remain sensitive to the opportunity for nesting by common garden and farmland birds in available site features, with enhancement opportunities considered for new planting and provision of bird boxes

Reptiles

There are historic records for widespread reptiles in the region, including slow-worm, grass snake, adder, and common lizard, but no recent (post-2014) confirmed sightings directly within or adjacent to the survey site. The habitats present, including managed grassland, hardstanding, and small fragmented areas of bramble, provide only marginal opportunities for foraging, basking, and shelter, lacking key features such as tussocky sward, log piles, or unmanaged banks. The walkover survey undertaken in June 2025 did not record any reptiles, and overall habitat quality for reptiles is considered very low. Nevertheless, there remains a minimal constraint for development: any vegetation or ground clearance, especially in marginal grassland or bramble areas, should be completed sensitively on a phased basis to allow reptiles to disperse, even though the risk of occurrence is very low.

Great crested newt

Four Great Crested Newt (GCN) records from 2016 have been returned from ponds located about 600-800m from the site, indicating presence within the wider landscape. No suitable aquatic

habitats are present within, or directly adjacent to, the site, and terrestrial habitat present on site is of sub-optimal suitability for GCN. Isolation of the site from confirmed populations and the absence of optimal habitat features on site mean that the risk to GCN is considered low. All groundworks or vegetation clearance should still be undertaken carefully with a precautionary approach. In the unlikely event that a GCN is discovered on site, advice should be sought from a suitability experienced ecologist before works proceed.

Hazel Dormice

Several hazel dormouse records (nests, live animals, prints) from 2022 confirm ongoing populations in Billingshurst, about 1km from the site, associated with well-established woodland and monitored nest box schemes. On-site assessment shows that the hedgerows present are dominated by Leylandii, and ornamental planting on other boundaries is generally sparse, fragmented, and lacks the species diversity or continuous canopy required by dormice. Bramble patches and scattered trees offer limited foraging but do not form linked habitat corridors. No evidence of dormice was found during site walkovers, and the current site is not considered suitable for supporting them. The primary constraint is very low; the main opportunity is to enhance habitat connectivity in the longer term by planting native, species-rich boundary features

Invertebrates

Recent records highlight an exceptional variety of notable invertebrates within 1km of the site, including priority and protected butterflies such as brown hairstreak (multiple records 2018–2024), purple emperor, small heath, white admiral, grizzled skipper, and dingy skipper. Stag beetle have been recorded repeatedly since 2021. Small numbers of long-horned bee and other rare bees and beetles also occur nearby. Despite local records, no priority or specialist invertebrates were observed on site during the 2025 survey, with habitats mainly supporting common species in tightly managed grassland and scrub. The existing features therefore present a very low constraint, but any enhancement of nectar-rich planting or deadwood supply would benefit local invertebrate populations.

Invasive Non-Native Species

A total of eighteen invasive non-native species (INNS) have been recorded in the wider landscape within the past decade. Despite these records, the walkover survey work found no INNS present within the site. Larger-scale groundworks, new planting, or soil movement should nonetheless continue with vigilance as part of good site practice. If any INNS are identified at any stage, statutory control and safe disposal protocols must be followed.

Designated Habitats and Priority Habitats and Species

There are no statutory (i.e., SSSI) or non-statutory designated ecological sites within or directly adjacent to the site, the closest being Coneyhurst Cutting SSSI (geological interest, not biodiversity), 0.6km away, and two LWSs (Wilden's Meadow and Rosier Wood) at 750–950m distance. These sites are separated by substantial areas of managed land, with no direct connectivity to the site. Priority habitats mapped within 1km include ancient woodland and traditional orchards, but none are present within the site or its immediate boundaries. While Section 41 priority species and a range of Red List taxa are frequent in the local landscape, the site's on-site habitats are typical of former equestrian land.

Due to the scale of the proposed works and the distance between designated sites and habitats there are no direct constraints anticipated from designated habitats are minimal, though cumulative effects on local biodiversity should be considered in post-development site management.

Opportunities

The proposed development presents a opportunity to transform the site into a mosaic of higher-value habitats that will deliver measurable biodiversity net gain and greatly enhance the ecological resilience of this part of the landscape. By prioritising ecological best practice and sensitive site design, the site can convert currently low-value or ecologically impoverished areas, such as modified grassland, non-native ornamental hedgerows, and sparsely vegetated ground, into wildlife-rich environments that actively contribute to local and regional biodiversity priorities. Instead of simply offsetting the impacts of development, the proposed development is well placed to achieve net positive outcomes for both nature and the local landscape character.

Deliver net positive outcomes for biodiversity and landscape character.

One of the most tangible ways to secure ecological uplift is through the establishment of a species-rich neutral grassland within the designated eastern BNG parcel. Creating wildflower meadows with a diverse, UK-native seed mix will supply nectar and pollen for locally recorded priority invertebrates, brown hairstreak, small heath, white admiral and purple emperor, and provide foraging/breeding habitat for declining farmland birds (skylark, linnet, yellowhammer). The location maximises sunshine, lies outside root-protection zones and ties directly into the site's BNG calculations.

Establish species-rich neutral grassland in the south of the site to support priority butterflies and farmland birds.

Enhancing and creating new native scrub habitats along the site's boundaries presents an opportunity to benefit butterflies, birds, bats, and small mammals. The targeted planting of native shrub species, particularly blackthorn (Prunus spinosa), will directly support the brown hairstreak butterfly, which relies on young blackthorn for egg-laying and has confirmed records in the Billingshurst area. Expanding the scrub matrix with additional native species such as hazel, dog rose, and guelder rose will further increase food, shelter, and movement opportunities for a wide range of wildlife, including nectar-feeding insects, nesting birds, commuting bats, and foraging reptiles.

Create and expand native scrub with blackthorn and other native species along boundaries to support priority butterflies, bats, birds, and reptiles att.

There is also opportunity to replace the existing non-native ornamental hedgerows, with their limited ecological value, with new, native hedgerows. By removing the Leylandii and poorly performing ornamentals, and introducing native components such as hawthorn, blackthorn, field maple, and dog rose, the site can dramatically increase structural diversity and habitat continuity. This will strengthen ecological connectivity for birds, bats, pollinators, and small mammals, and bolster green infrastructure links to designated sites in the wider area.

Replace non-native ornamental hedges at the site with species-rich native hedgerows to improve habitat connectivity and bolster local ecological networks.

Expanding on this approach, the planting of native trees across the site, using species such as oak, wild cherry, and field maple, will further enhance vertical habitat structure, provide future roosting and nesting sites, and support woodland-edge biodiversity. These plantings will replace current ornamental and non-native trees, delivering long-term ecological and landscape character benefits in line with national best practice.

Introduce native tree planting at the site to enhance site structure and support target woodland and edge species.

Another opportunity at the site lies in incorporating habitat complexity through the re-use of natural debris and demolition material. Creating log piles, brush stacks, and stone refuges along site margins will deliver key microhabitats for basking reptiles and invertebrates, as well as hibernacula for small mammals, resources often limited in modern rural settings.

Create log and debris piles at the site to provide refugia for reptiles, small mammals, and invertebrates.

Integrating wildlife-friendly features into new and existing site infrastructure will be important for long-term success. Installing nest boxes for birds, including species-specific boxes for declining farmland birds**,** and bat boxes on new buildings or mature trees can support both breeding and roosting populations already documented in the wider landscape.

Install bird and bat boxes at the site to increase roosting and nesting opportunities for priority local species.

To ensure these opportunities create meaningful and lasting change, all new and enhanced habitats should be secured through a long-term management and monitoring plan. Establishing a 30-year management regime for wildflower grassland, native hedgerows, and scrub will ensure these habitats achieve good ecological condition under the BNG metric, with regular monitoring to adapt management as required.

Implement a long-term, 30-year management and monitoring plan at the site to secure and maintain biodiversity net gain across the site.

Mitigation Hierarchy

Avoidance

Patches of high-value habitat (e.g., mature bramble stands, species-rich ruderal swards), outside of the redline boundary will be avoided wherever possible in both construction and compound placement, thereby preserving essential resources for local wildlife and reducing immediate habitat loss prior to the implementation of compensatory measures.

Minimisation

- Sensitive Lighting Design: The development will follow a sensitive lighting strategy to reduce disturbance to nocturnal species such as bats. Lighting will be low-intensity, directional, and designed to avoid illuminating boundary habitats, hedgerows, and new grassland or scrub areas.
- Timing of Works: To reduce impacts on breeding fauna, all vegetation clearance and demolition at the site will be scheduled outside the main bird nesting season (March to August) wherever possible. If works are unavoidable during this period, a pre-works nesting bird survey will be completed by a qualified ecologist. Similarly, removal of existing buildings or structures with potential bat suitability will be programmed outside peak bat activity periods (May–August).
- Precautionary Methods: Use precautionary methods for vegetation and rubble removal to protect reptiles and amphibians. This includes hand-searching and careful dismantling of potential refugia to avoid harming these species.

Compensation: Where loss of low-value habitat is unavoidable, equivalent or higher quality habitats will be recreated or enhanced elsewhere on site. This includes establishing species-rich neutral grassland, expanding native scrub and hedges, and ensuring habitat creation is phased to

allow new features to mature as older ones are lost. These measures will be commissioned as early as possible in the proposed development, aiming for establishment prior to commencement of main construction.

Enhancement: The proposed development will deliver measurable biodiversity net gain through targeted habitat creation, management, and provision of wildlife features. This includes new areas of wildflower meadow, native scrub and hedgerow planting (especially blackthorn and other host shrubs for priority butterflies), native tree planting, and the installation of boxes for breeding birds and bats. The long-term management plan will further ensure habitats improve in condition and benefit a wide range of priority and protected species.

Habitat Management and Monitoring

A Habitat Management and Monitoring Plan (HMMP) will be implemented to ensure delivery and maintenance of BNG for at least 30 years, as required by the Environment Act 2021.

Target Criteria and Feasibility Information

Target Habitat Types and Condition Criteria

The proposed landscape scheme incorporates the creation and enhancement of habitats that will deliver a minimum 10% BNG uplift over the site's baseline value, in accordance with the DEFRA Statutory Biodiversity Metric and Horsham District Council requirements. Target habitat types, condition criteria, and embedded design measures are as follows:

- Species-Rich Neutral Grassland (Eastern BNG Parcel) – 450 m² of existing "Other neutral grassland" to be enhanced to Moderate condition.

  Target criterion: Establish using a UK-native wildflower meadow seed mix comprising at least 15 native forb species typical of open neutral grassland; vegetation to support nectar and pollen provision for priority invertebrates (e.g. brown hairstreak, small heath) and foraging habitat for farmland birds (e.g. skylark, linnet, yellowhammer).

- Mixed Native Scrub – 90 m² to be created, commencing at Poor and achieving Moderate condition within 5 years.

  Target criterion: Plant blackthorn, hawthorn, dogwood and other native species at 2–3 plants/m², achieving ≥80 % survival by Year 5.

- Native Hedgerow – 60 m of hedgerow to be created at Poor condition, achieving a 10 % uplift to 0.066 hedgerow units. Target criterion: At least 5 native woody species per 30 m; average canopy density ≥75 % within 5 years.

- Urban Trees – Five native, site-appropriate trees (0.02 ha) to be planted at Poor condition, with long-term aim of Moderate condition.

  Target criterion: ≥80 % survival rate by Year 5 with protective guards and aftercare.

Feasibility and Design Integration

The habitat proposals have been designed in conjunction with the final site layout and are achievable without further survey work:

- Location and Aspect: The southern meadow parcel is outside tree root protection zones and benefits from optimal sun exposure, suitable for wildflower establishment and ongoing maintenance.

- Soil Preparation: Topsoil amelioration and decompaction will be carried out prior to seeding, ensuring appropriate nutrient levels and drainage for target species.
- Planting Schedule: All new planting and seeding will be implemented in the first planting season post-construction to maximise establishment success.
- Embedded Management Measures:
    - Neutral Grassland: Annual late-summer cut with arisings removed to maintain low soil fertility.
    - Scrub and Hedgerow: Formative pruning in Years 1–3 and selective management thereafter to encourage structural diversity.
    - Urban Trees: Guarded and watered for first three growing seasons.

These measures are shown on the submitted landscape drawings (Ref: 122_104) and have been integrated into the design to ensure delivery of the target habitat conditions.

Table 4 provides a summary of the post development habitat metrics, this represents an uplift from the baseline 0.255 units, achieving compliance with the statutory minimum 10 % BNG requirement.

Table 4 Summary of Post-Development Habitat Metrics

Habitat Component	Area / Length	Initial Condition	Target Condition	Post-Dev Units
Neutral grassland	450 m² (0.045 ha)	Moderate	Moderate	0.250
Mixed native scrub	90 m² (0.009 ha)	Poor	Moderate (5 yr)	0.030
Urban trees	5 no. (0.02 ha)	Poor	Poor → Moderate	0.060
Total Post-Development Habitat Units				**0.34**
Native hedgerow	60 m	Poor	Poor → Moderate	0.12
Total Post-Development Hedgerow Units				**0.12**

Further Survey Recommendations

Although the PEA and PRA have provided a robust baseline, the following further survey and pre-construction checks are recommended to ensure legal compliance and best practice:

Pre-commencement Ecological Checks:

Immediately prior to any site clearance or construction, a pre-commencement check by a suitably qualified ecologist should be undertaken. This must include updated inspection of all buildings and trees to be affected for evidence of bats, nesting birds, badgers, reptiles, and any other protected or notable species that may have colonised the site since the original survey.

Nesting Bird Checks:

If vegetation clearance, building demolition, or works to structures are scheduled during the bird nesting season (March–August), a nesting bird check must be completed within 48 hours of works commencing. If active nests are found, an appropriate buffer must be maintained until the young have fledged.

Toolbox Talk and Site Induction:

All contractors and site operatives should receive a toolbox talk from an ecologist prior to commencement, covering recognition and legal protection of bats, nesting birds, reptiles, and other relevant species, as well as the procedures to follow if any are encountered during works.

Precautionary Working Methods (from PRA Appendix 3):

- Any works involving the removal of cladding or roof structures should proceed with care, using hand tools where feasible to minimise disturbance.
- A soft-strip approach should be used, especially around identified access gaps.
- Progressive working from one end of the building should be adopted to allow potential escape routes.
- Should bats be found during works, activity must cease immediately and advice sought from a licensed bat ecologist.
- Avoid major structural works during the peak bat activity period (May–August) where practicable.
- Avoid early morning or late evening working to minimise disturbance during peak bat foraging times.
- Schedule works to avoid adverse weather conditions when bats may be sheltering.

Monitoring and Adaptive Management:

Ecological input should be maintained throughout construction to advise on any unexpected ecological constraints and to monitor the effectiveness of mitigation and enhancement measures. The Habitat Management and Monitoring Plan (HMMP) should commence post-construction, with regular reviews to ensure delivery of BNG and ecological objectives.

Trigger for Additional Survey:

If any evidence of protected species (e.g. bats, reptiles, dormouse, GCN, badger) is discovered during pre-construction checks or works, all activity in the affected area must cease immediately

and advice sought from a licensed ecologist. Further survey or mitigation may be required depending on the findings.

These recommendations, including those from the PRA (Appendix 3), will ensure compliance with wildlife legislation and planning policy, and help deliver the intended biodiversity net gain for the site.

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Appendix 1 – Habitat Map – UKHab/BNG

Appendix 2 – Statutory BNG Metric – Baseline Extract

BNG baseline figures are presented below.

FINAL RESULTS			
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-0.25	
	Hedgerow units	-0.06	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	-100.00%	Total net gain achieved is less than target set ▲
	Hedgerow units	-100.00%	Total net gain achieved is less than target set ▲
	Watercourse units	0.00%	
Trading rules satisfied?	No - Check Trading Summaries ▲		

Possible enhancements, considered and discussed within this report, show that it possible to achieve gain on site.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	0.08
	Hedgerow units	0.06
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	32.89%
	Hedgerow units	93.00%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Appendix 3 - Preliminary Bat Roost Assessment

Preliminary Roost Assessment (PRA) – Stables and other outbuildings

A daytime Preliminary Roost Assessment (PRA) was completed on 6 June 2025 to evaluate the suitability of buildings and structures present on site for roosting bats. The assessment was undertaken in accordance with the Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th Edition (Collins, J. ed. 2023) and CIEEM Guidelines for Preliminary Ecological Appraisal (2017).

Building Identification and Inventory

The site contains **six separate structures** arranged around hardstanding and amenity areas, comprising two main stable buildings, and an ancillary store structure:

Stable 2 Complex (69m² GIA / 87m² Footprint):

- **Structure 1**: Tack Room – single-storey, timber-framed construction with corrugated roof and timber cladding
- **Structure 2**: Store – single-storey, timber-framed construction with corrugated roof and timber/brick cladding
- **Structure 3**: Central Store section – single-storey, timber-framed construction with corrugated roof
- **Structure 4**: Stable stalls section – single-storey, timber-framed construction with corrugated roof and open-fronted design to stalls

Stable 1 (12.4m² GIA / 18.2m² Footprint):

- **Structure 5**: Single-storey, timber-framed equestrian stable with corrugated roof and timber cladding

Ancillary Structure:

- **Structure 6**: Hay storage barn – open-sided agricultural structure with corrugated iron roof and timber post-and-rail frame

All structures are to be demolished as part of the proposed development.

Survey Methodology

The PRA comprised a detailed inspection of each building through direct internal and external access, affording close examination of potential bat entry/exit points, potential roosting sites, and evidence of occupation (droppings, dead bats, urine stains, grease marks, etc.). General habitat resources for bats, including commuting and foraging habitat and wider habitat connectivity, were also reviewed. Assessment of each building's suitability for roosting bats was undertaken systematically against the criteria outlined in Table 4.1 of the BCT 4th Edition Guidelines, which considers:

1. **Roosting Potential**: Based on structure, materials, roof void dimensions, crevice availability, and accessibility
2. **Habitat Context**: Connectivity to known feeding and commuting habitats
3. **Presence of Bats**: Evidence of occupation or signs of use

Each structure was individually assessed for its suitability for supporting maternity roosts, summer roosts, transitional/occasional roosts, and hibernation sites, recognising that different species and life stages use buildings differently.

The PRA was completed in line with current best practice by a professionally competent ecologist with extensive experience in bat survey methodology, having conducted PRA assessments for over 14 years in accordance with established professional standards.

Survey conditions

The PRA was undertaken on 6 June 2025 during optimal daylight conditions with clear visibility for both external and internal inspections. Weather conditions were dry with light winds, providing excellent conditions for comprehensive photographic documentation and detailed structural assessment. The survey commenced at 11:00 and concluded at 13:00, with ambient temperature approximately 20°C. All areas of the buildings were accessible for inspection, with no safety constraints limiting the thoroughness of the assessment.

Updated Building Assessment for Bat Roosting Potential (December 2025)

The following section provides an overview of each of the structures on the site and describes the features as recorded during the field survey. A layout plan of the structures is provided at the end of the assessment.

Stable 2 Complex (69m² GIA / 87m² Footprint)

Structure 1: Tack Room

Suitability Assessment: Low

Description and Dimensions: Single-storey timber-framed building forming part of the Stable 2 complex. Constructed from timber frame with corrugated cladding and timber boarding. Pitched corrugated roof with minimal roof void. Forming the western end of the Stable 2 complex.

Roosting Potential Assessment:

- **Positive Features**: Roof void accessible via internal access points; some timber frame members exposed; potential crevices where roof meets walls
- **Negative Features**: Corrugated concrete roofing provides limited suitable crevices; roof void is small and open; poor thermal properties from single corrugated skin; active use as equipment storage and disturbance; high activity levels during operational use.

Evidence of Occupation:

- No bat droppings observed on floor, beams, or ledges within accessible roof areas
- No dead bats, skeletal remains, or mummified bats observed
- No urine stains or grease marks on roof timbers, rafters, or crevices
- Cobwebs present and undisturbed throughout accessible roof void, indicating no bat disturbance activity
- No guano piles or accumulated evidence of habitation
- Equipment storage within building indicates regular human activity and disturbance

Habitat Connectivity: Building is positioned within the central cluster of structures with minimal immediate access to commuting habitat. Bramble scrub boundary approximately 20m distant with moderate continuity onward. Low-value commuting resource.

Conclusion: This building is assessed as having **low suitability** for roosting bats. Whilst some structural features provide minimal potential for occasional roosting, the poor thermal properties, open roof void design, active operational use with associated disturbance, and low-quality habitat context suggest this structure would be an unattractive roosting option for most bat species, particularly for maternity colonies or hibernating bats.

Structure 2: Store

Suitability Assessment: Low

Description and Dimensions: Single-storey storage building forming part of the eastern section of the Stable 2 complex. Constructed from timber frame with mixed corrugated cladding and cement board external walls. Pitched corrugated roof with minimal roof void. Forms integral part of the Stable 2 cluster.

Roosting Potential Assessment:

- **Positive Features**: Mixed external materials (brick/cement board) may provide some crevice potential at wall/roof junctions; timber frame members may present roosting opportunities; roof void with some accessibility
- **Negative Features**: Corrugated roof provides very limited suitable crevices; cement board/brick provides poor crevice potential due to clean mortar joints; minimal roof void depth; poor thermal insulation; high humidity from agricultural storage use; regular disturbance from equipment storage and access

Evidence of Occupation:

- No bat droppings observed on floor, stored materials, or structural elements
- No dead bats or skeletal remains observed
- No urine stains or grease marks on roof structure
- Cobwebs present and undisturbed, indicating no bat activity
- Storage materials present throughout building indicating active use
- No evidence of bats in any accessible areas

Habitat Connectivity: Building positioned within central structure cluster; isolated roosting location with poor commuting habitat access.

Conclusion: This building is assessed as having **low suitability** for roosting bats. The mixed cladding materials provide limited roosting features, the poor thermal environment, high disturbance from agricultural storage use, and isolated habitat location make this an unlikely choice for bats.

Structure 3: Central Store Section

Suitability Assessment: Negligible To Low

Description and Dimensions: Single-storey store/utility section forming the central portion of the Stable 2 complex. Timber-framed construction with corrugated cladding and corrugated roof. Minimal enclosed space; primarily used for equipment and hay storage.

Roosting Potential Assessment:

- **Positive Features**: Corrugated cladding provides gaps between panels that could theoretically allow bat entry; roof void present but minimal
- **Negative Features**: Corrugated roof provides minimal deep crevice potential; open storage use means no enclosed roof void; high disturbance from agricultural equipment storage; poor thermal properties; limited structural features; well-lit from multiple openings

Evidence of Occupation:

- No bat droppings observed on floor or structural elements
- No dead bats or other evidence of occupation
- Hay and equipment storage throughout indicating active use
- No signs of bats present

Habitat Connectivity: Central location within structure cluster with minimal habitat isolation.

Conclusion: This building is assessed as having **negligible to low suitability** for roosting bats. The open storage design, corrugated cladding, high disturbance levels, and poor thermal environment make bat occupation highly unlikely.

Structure 4: Stable Stalls Section

Suitability Assessment: Negligible

Description and Dimensions: Single-storey stable stalls section forming the eastern/rear portion of the Stable 2 complex. Timber post-and-rail framework with corrugated roof and open-fronted design. Multiple individual stalls accessed from front and sides. Part of the integrated Stable 2 complex.

Roosting Potential Assessment:

- **Positive Features**: Timber posts and frame members present; some covered areas under roof
- **Negative Features**: Open-fronted design to stalls with multiple large openings; minimal protection from weather; large gaps between timber rails; no enclosed roof void; high light penetration; exposed to elements; active use as livestock shelter with associated disturbance, smells, and activity

Evidence of Occupation:

- No bat droppings observed on floors, posts, or roof structure
- No dead bats or evidence of occupation
- Straw bedding and hay present indicating recent active use
- No guano accumulation or bat-associated debris
- Smell of livestock and ammonia from urine indicating active use

Habitat Connectivity: Positioned within integrated structure cluster; minimal isolation but poor habitat context.

Conclusion: This building is assessed as having **negligible suitability** for roosting bats. The open-fronted design to stalls, lack of protected roof void, exposure to elements, and high disturbance

from active livestock use make occupation by roosting bats virtually impossible. The harsh micro-environment (smell, ammonia, dust, activity) makes this unsuitable for any bat species.

Stable 1 (12.4m² Gia / 18.2m² Footprint)

Structure 5: Stable 1 Single Stall

Suitability Assessment: Negligible To Low

Description and Dimensions: Single-storey small equestrian stable building. Timber-framed construction with corrugated cladding and roof. Single stall design with open front and side access. Dimensions approximately 4.5m x 4m. Located separately from the Stable 2 complex to the north-east of the site. Minimal roof void.

Roosting Potential Assessment:

- **Positive Features**: Timber frame members present; some roof coverage; small enclosed areas
- **Negative Features**: Open-fronted design with minimal wall coverage; corrugated cladding provides minimal suitable crevices; minimal roof void; poor thermal properties; exposed to weather on multiple sides; historically used as equestrian shelter with associated disturbance; limited structural complexity

Evidence of Occupation:

- No bat droppings observed in interior or around building base
- No dead bats or skeletal remains
- No urine stains or grease marks on structural elements
- Building appears clean and undisturbed
- No evidence of bats during inspection
- No guano trails or accumulations

Habitat Connectivity: Building positioned separately from Stable 2 cluster but still within developed site area. Limited immediate habitat connectivity; isolated from commuting resources.

Conclusion: This building is assessed as having **negligible to low suitability** for roosting bats. The open design, corrugated cladding, small roof void, poor thermal environment, and isolated habitat location suggest very low likelihood of bat occupation. Any roosting would be limited to opportunistic brief sheltering rather than sustained occupation.

Ancillary Structure

Structure 6: Hay Storage Barn

Suitability Assessment: Negligible

Description and Dimensions: Open-sided agricultural barn structure used for hay and straw storage. Timber post-and-rail frame with corrugated roof. Open on all sides with minimal walls (only partial timber boarding on weather side). Dimensions approximately 7m x 5m. Located at south-western corner of site.

Roosting Potential Assessment:

- **Positive Features**: Roof structure present providing some overhead coverage

- **Negative Features**: Completely open-sided design with no protective walls except partial boarding; large open spaces; no enclosed roosting cavities; fully exposed to wind, rain, and light; active agricultural use with hay bales stored throughout; poor thermal environment; high disturbance from loading/unloading activity

Evidence of Occupation:

- No bat droppings observed on floor, posts, or roof structure
- No dead bats or evidence of occupation
- Hay bales and agricultural materials stored throughout
- No guano accumulation or bat-associated debris
- Structure remains fully exposed with no suitable roosting features

Habitat Connectivity: Peripheral location at site edge with habitat connectivity to the surrounding hedgerows.

Conclusion: This structure is assessed as having **negligible suitability** for roosting bats. The completely open-sided design, lack of protective features, exposure to elements, and active agricultural use make occupation by roosting bats virtually impossible. No enclosed spaces, protection, or suitable roosting features are present.

Environmental context

The outbuildings are situated in an open, part-abandoned context, with boundary scrub and hedgerow providing some limited foraging and commuting resources for common bats such as pipistrelles. The central built and hardstanding area is considered less suitable for feeding or transit. Lighting is limited to interior fixtures and is not a source of significant disturbance to bats using perimeter vegetation.

Updated suitability assessment

The site buildings are assessed as having negligible to low suitability for roosting bats. Their construction, open and fully visible interiors, regular past disturbance, and lack of suitable features combine to make bat presence highly unlikely. Although some potential access points for bats exist, none link to compartments or features that would support even opportunistic use. Table 1 presents a summary of each structures suitability.

Table 1. Overall structure suitability for bats.

Structure	Location	Type	Dimensions	Suitability	Reasoning
1	Stable 2	Tack Room	Part of 87m² complex	LOW	Roof void present but poor thermal properties, open design, active use; no evidence of occupation
2	Stable 2	Store	Part of 87m² complex	LOW	Limited crevice potential; mixed cladding; isolated location; active storage use; no evidence
3	Stable 2	Central Store	Part of 87m² complex	NEGLIGIBLE–LOW	Open storage design; corrugated cladding;

					minimal enclosed roof void; high disturbance
4	Stable 2	Stable Stalls	Part of 87m² complex	NEGLIGIBLE	Open-fronted design; no roof void; active livestock use; harsh micro-environment; unsuitable
5	Stable 1	Single Stall	18.2m² footprint	NEGLIGIBLE–LOW	Open design; small roof void; poor thermal; isolated location; no evidence
6	Hay Storage	Agricultural barn	~7m x 5m	NEGLIGIBLE	Completely open-sided; no enclosed spaces; no protection; active agricultural use

Overall Site Assessment: The cluster of buildings presents **negligible to low suitability** for roosting bats overall. The buildings are:

- Poorly insulated with inadequate thermal properties for sustaining bat populations
- Isolated within agricultural landscape with limited habitat connectivity
- Predominantly constructed from materials (corrugated, timber rails, open frames) that provide minimal suitable roosting features
- Lacking the characteristic features (secure crevices, sheltered cavities, thermal stability) required by bat maternity colonies or hibernating populations
- Subject to active agricultural use with high disturbance levels and harsh micro-environments unsuitable for bats.

Updated further assessment requirement

Assessment Against BCT Guidelines Table 7.2 (Emergence Survey Requirements)

Table 7.2 of the BCT Good Practice Guidelines specifies emergence survey requirements based on building suitability:

- Negligible Suitability: No emergence surveys required
- Low Suitability: Minimum 1 dusk emergence survey visit required
- Low/Moderate Suitability: Minimum 2 emergence survey visits required
- Moderate Suitability: Minimum 3 emergence survey visits required
- Moderate/High or Higher Suitability: Minimum 4 emergence survey visits required (with additional consideration for maternity roosts)

Given the assessment above assessment:

- Structures 1 and 2 (LOW suitability): Would trigger 1 emergence survey visit requirement IF the buildings were retained as part of an operational development. However, as all buildings are to be demolished and no enclosed roosting potential is present, the precautionary method statement is considered proportionate mitigation.

- Structures 3, 4, 5, and 6 (NEGLIGIBLE to LOW): Do not trigger emergence survey requirements under normal circumstances.

Recommendations

- Further survey: Given the negligible–low suitability, absence of evidence, and the demolition of all structures under a precautionary method statement, further survey would not materially alter the assessment of effects and is therefore not considered necessary for determination.
- Precautionary working methods: If demolition or works affecting the structures are planned, a pre-commencement check should be carried out by a suitably experienced and licensed bat ecologist within 24 hours of works. Any removal of cladding or roof materials should use hand tools and a soft-strip approach, working progressively to allow escape of any undetected bats.
- Toolbox talk: Site operatives should receive an induction on bat protection measures.
- Immediate cessation: If any bats are discovered during works, stop work and consult a licensed bat ecologist.
- Timing: Where practicable, avoid demolition at dawn/dusk; works may proceed in the main bat activity season subject to the precautionary method and ecological supervision.

Legal Compliance

All bat species and their roosts are legally protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. The precautionary measures outlined above are designed to ensure compliance with this legislation, even in the absence of confirmed bat presence. Adhering to these protocols will help prevent accidental harm to bats or their roosts and avoid potential legal consequences for the project.

Enhancement Opportunities

The development offers an opportunity to enhance bat habitat by installing bat boxes on new or retained structures and maintaining or improving dark corridors along the site's boundaries. Planting native hedgerow and scrub, especially where foraging opportunities for pipistrelles can be improved, and restricting external lighting will all benefit local bats.

Conclusion

All outbuildings at the site have been thoroughly inspected and found to be of negligible to low suitability for bat roosts, with no evidence of current or historic use. The mitigation and enhancement measures set out above will ensure continued compliance with all relevant wildlife legislation.

References

Collins J (ed)(2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

Photos

	Stable 1 (Structure 5)- Wooden clad design with felt roofing over corrugated concrete sheets.
	Hay barn (Structure 6) with open front entrance. Tin rood and part tin and wooden clad design.
	Internal view of hay barn. Minimal gaps in wooden joints. No suitable crevices for bats present.

	Stable 2 (Structures 1-4) Internal view of stables. Storage use and lighting. No suitable crevices for bats to use. Open to wind from single skin roof. Thermal fluctuation.
	Stable 2 (Structures 1-4) Wooden joints with no sign of expanded features that could be used by bats.
	Stable 2 (Structures 1-4) Suitable areas for roosting within joists had no sign of use and there were no bats present within any features during the survey. There are the only suitable crevices for roosting however are minimal and within stables that are actively used.

Structure layout

Appendix 4 – Proposed post development BNG creation/enhancements

Habitat	Area	Units	Condition	Created or Enhanced
Habitats				
Mixed Scrub	90m²	0.03	Poor	Created
Other neutral grassland	450m²	0.25	Moderate	Enhanced
Urban trees (5)	0.02	0.06	Poor	Created
Hedgerows				
Native hedgerow	60m	0.12	Poor	Created