Preliminary Ecological Appraisal

3 Station Road, Billingshurst, West Sussex, RH14 9RF

November 2025

Arun Ecology Ltd

Registration in England and Wales. Company number: 12524764

Registered Address: Russetts, Hayes Lane, Slinfold, West Sussex

Email: enquiries@arunecology.com – www.arunecology.com

Client	Philip MacDonald
Project	Preliminary Ecological Appraisal – 3 Station Road, Billingshurst, West Sussex, RH14 9RF.
Version	Final
Project team	Project Director – Hannah Baker
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Revision number	Date of issue	Author	Reviewer
001	07/11/2025	Amy Oldham BSc (Hons) – Assistant Ecologist	Hannah Baker BSc (Hons), MSc, ACIEEM – Principal Ecologist and Director

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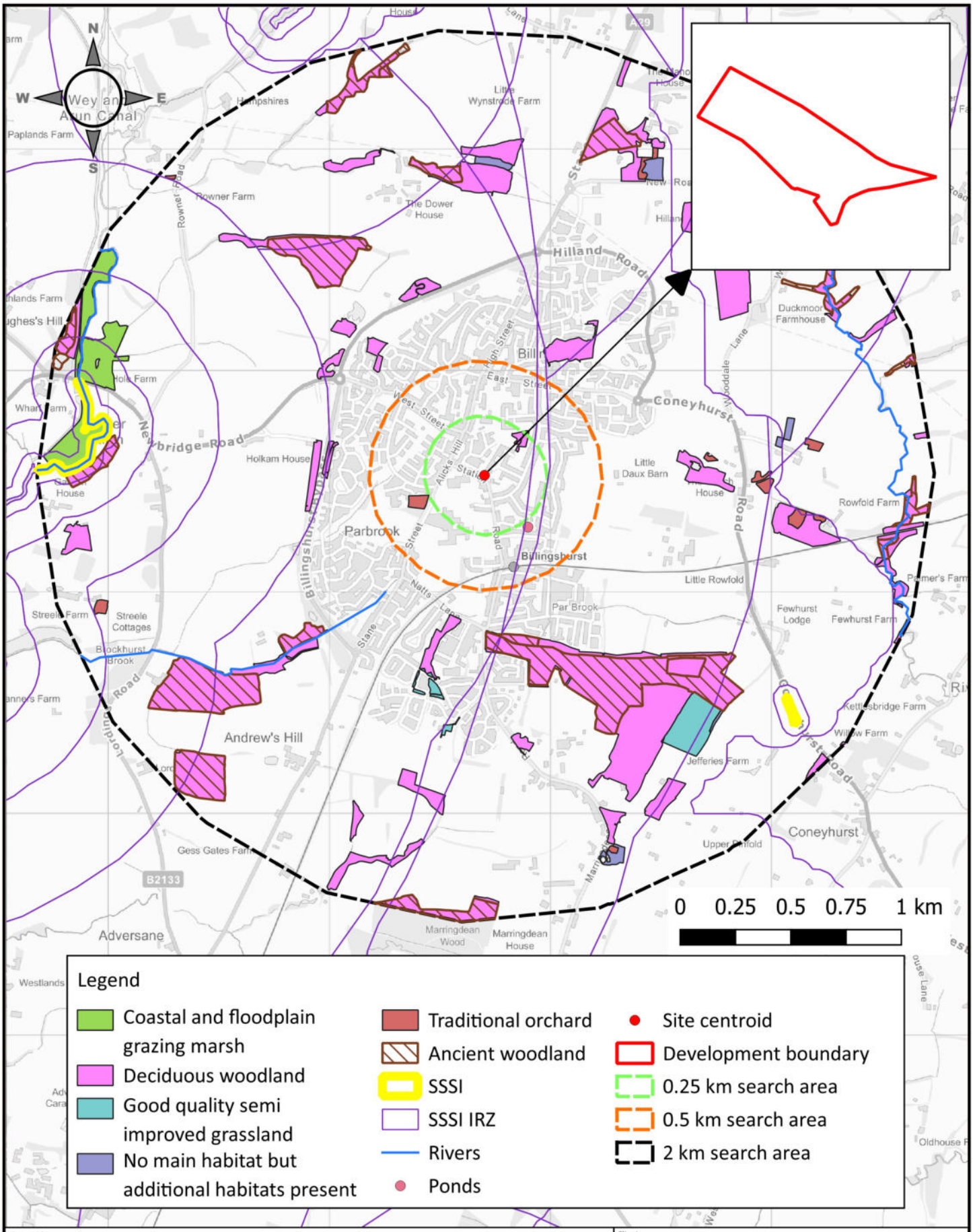

Figure title: Site Location and Desk Study Results		Client: C-NJA-075-001-001 Philip MacDonald
Site location: 3 Station Road, Billingshurst, West Sussex, RH14 9RF		
Figure number: 1	Date drawn: 10/10/2025	Scale at A4: 1:23000
Revision: 1	Cartographer: AO	Approver: HB

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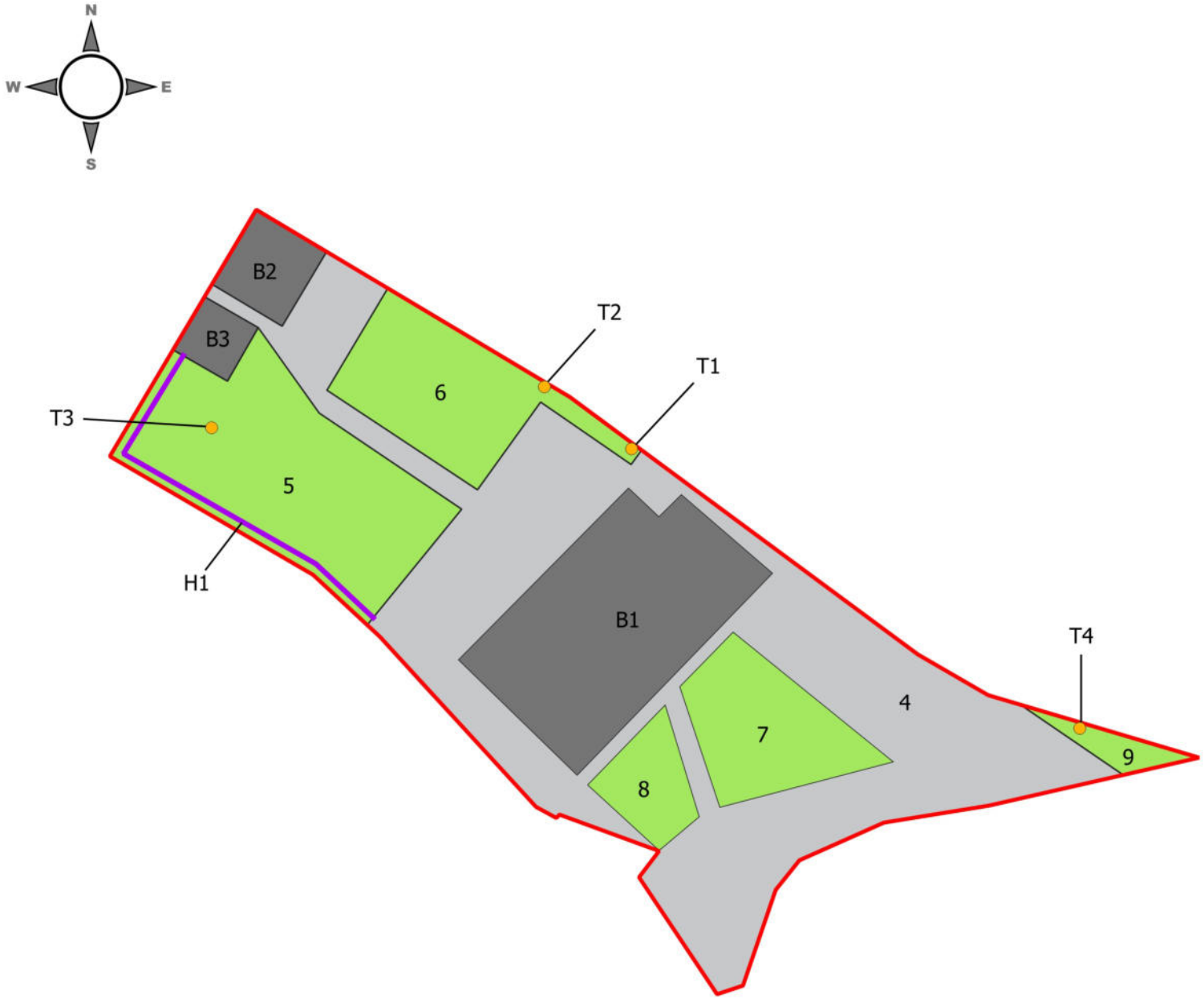

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Development boundary

UK Habitat Classification

u1b - Developed land, sealed surface

u1b5 - Developed land, sealed surface (building)

u1 828 - Vegetated garden

h2b - Non-native and ornamental hedgerow

32 - Scattered trees

Figure Title: UK Habitat Classification Survey - Results		
Client/ Project Reference: Philip MacDonald C-NJA-075		
Figure number: 2	Revision: 1	Scale at A4: 1:300
Cartographer: AO	Date drawn: 04/11/2025	Approver: HB

Photo 1: Displaying the southeastern aspect of building B1 within the development boundary.

Photo 2: Displaying the northwestern aspect of building B1 within the development boundary.

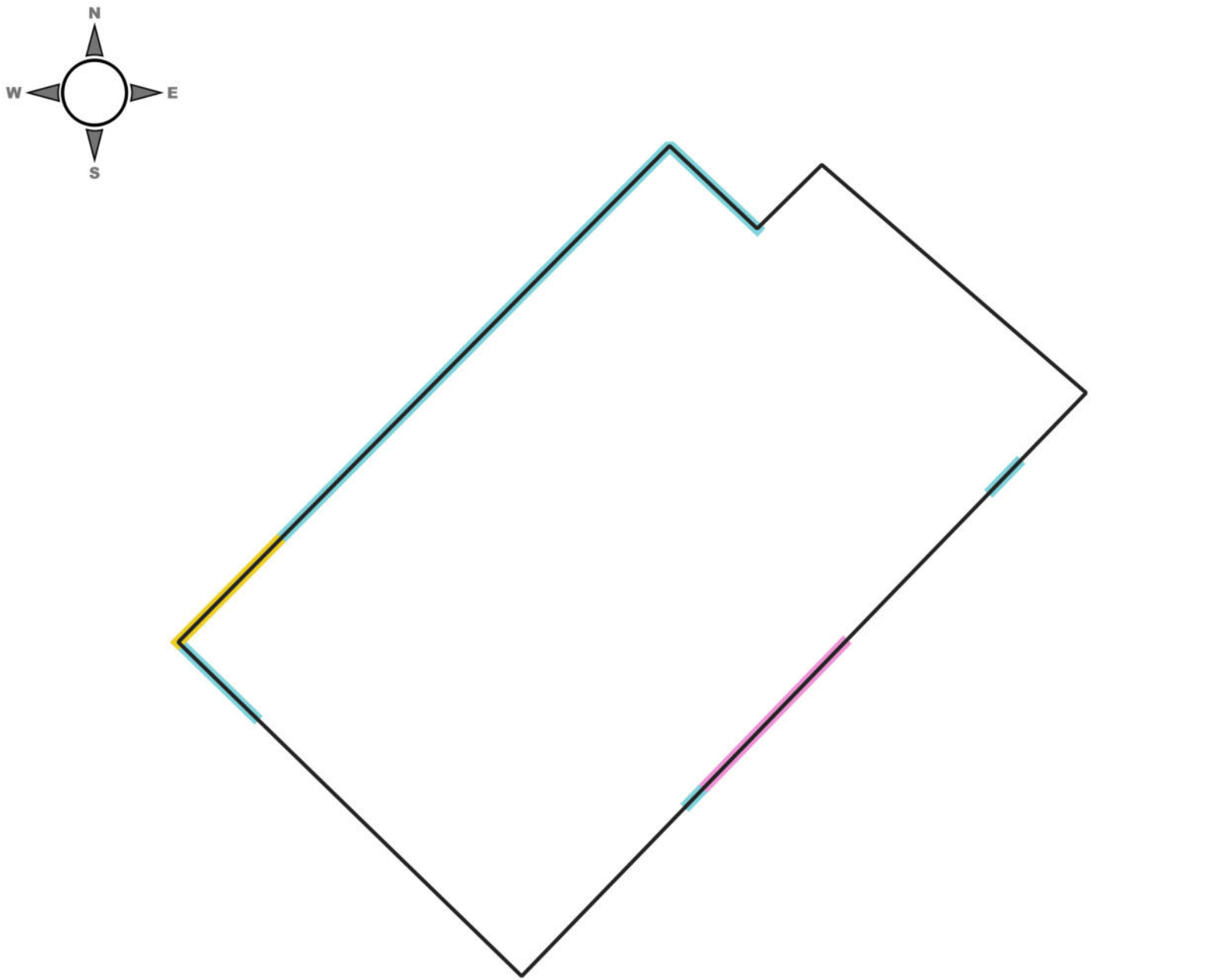
Photo 3: Displaying vegetated garden within the development boundary.

Photo 4: Displaying a mature ash tree (T3) within the development boundary.

Photo 5: Displaying vegetated garden and a non-native and ornamental hedgerow within the development boundary.

Photo 6: Displaying a conifer (T1) and a tulip tree (T2) within the development boundary.

Figure Title: UK Habitat Classification Survey – Photographs			**Client:** Philip MacDonald
Site Location: 3 Station Road, Billingshurst, West Sussex, RH14 9RF			**Project Ref:** C-NJA-075
Figure No: 3	**Revision No:** 1	**Scale:** n/a	arun ecology
Cartographer: AO	**Date Drawn:** 04/11/2025	**Reviewed By:** HB	



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Legend

Building layout

Potential roosting features and access/ egress points

Gaps into void behind wooden cladding

Gaps between wooden cladding

Gaps between roof tiles

Figure Title: Preliminary Roost Assessment - Results		
Client/ Project Reference: Philip MacDonald C-NJA-075		
Figure number: 4	Revision: 1	Scale at A4: 1:100
Cartographer: AO	Date drawn: 04/11/2025	Approver: HB

Photo 1: Displaying the eastern corner of building B1 within the development boundary.

Photo 2: Displaying the northern corner of building B1 within the development boundary.

Photo 3: Displaying building B2 within the development boundary.

Photo 4: Displaying building B3 within the development boundary.

Photo 5: Displaying gaps between wooden cladding on building B1 within the development boundary.

Photo 6: Displaying gaps into a void behind wooden cladding on building B1 within the development boundary.

Figure Title: Preliminary Roost Assessment – Photographs			**Client:** Philip MacDonald
Site Location: 3 Station Road, Billingshurst, West Sussex, RH14 9RF			**Project Ref:** C-NJA-075
Figure No: 5	**Revision No:** 1	**Scale:** n/a	arun ecology
Cartographer: AO	**Date Drawn:** 04/11/2025	**Reviewed By:** HB	

1. Summary and Recommendations

Proposals	• Philip MacDonald is proposing a development at 3 Station Road, Billingshurst, West Sussex, RH14 9RF (see Figure 1). • The proposals include the demolition of an existing dwelling (building B1) and two wooden sheds (buildings B2 and B3), construction of three new residential dwellings, construction of a new driveway and associated landscaping within the development boundary.
Surveys	• A desk study was conducted that included the purchase of records from the Sussex Biodiversity Record Centre. • A site visit was completed that included a UK Habitat Classification Survey and an appraisal of the habitats within the development boundary to act as ecological receptors.
Impact Assessment	• Mitigation will be required within the design of the development to ensure there are no adverse impacts that arise from light pollution on bat flightlines, that fall within the 6.5 km key conservation zone of The Mens SAC and the 12 km wider conservation area for Ebernoe Common SAC. • Based upon the desk study results, the habitats recorded within the development boundary and the development proposals, [redacted] and other mammal burrows, bats, nesting birds and hedgehogs are a material consideration for the development. • During the PRA, building B1 was assessed as having moderate suitability for roosting bats. Therefore, the development could contravene the legislation outlining the protection of bats, without further assessment to determine the presence or likely absence of bats. • Trees T1 and T2 will be removed as part of the development proposals and were assessed as having suitability for roosting bats (PRF-I) during the ground level tree assessment. Appropriate mitigation measures will be required during the construction phase of the development. • It is not anticipated that the development will generate significant levels of pollution due to its small scale, however, mitigation will be required during the construction phase of the development to ensure there is no on-site or off-site pollution to habitats or water sources. • The development will be required to achieve a measurable net gain for biodiversity as defined by The Environment Act, 2021, as well as incorporate 'non-measurable' ecological enhancements into the design of the development in line with national and local planning policy.

Recommendations	**The recommendations below represent a summary only. The full recommendations of this report are outlined in section 6.** **Further Assessments, Surveys and Consultations** • Two bat emergence surveys on building B1 should be undertaken in line with BCT Good Practice Guidelines (Collins, 2023) to determine the presence or likely absence of bats. **Mitigation** • The mitigation measures outlined in this report for [redacted] other mammals burrows, bats, hedgehogs, nesting birds and pollution prevention should be followed during the design and construction phase of the development. **Ecological Enhancements** • The ecological enhancements outlined within this report should be incorporated into the design of the development.

2. Introduction

2.1 Development Location

2.1.1 Philip MacDonald is proposing a development (grid reference: TQ 08706 25528) at 3 Station Road, Billingshurst, West Sussex, RH14 9RF (see Figure 1). The above address is hereafter referred to as 'the site' and Philip MacDonald as the 'applicant'.

2.1.2 The local planning authority for the site's location is Horsham District Council (HDC).

2.2 Development Proposals

2.2.1 The applicant seeks planning consent for the redevelopment of a residential site. The proposals include:

- Demolition of an existing dwelling (building B1);
- Demolition of two wooden sheds (buildings B2 and B3);
- Construction of three new residential dwellings;
- Construction of a new driveway; and
- Associated landscaping within the development boundary.

2.2.2 The proposals above are hereafter referred to collectively as 'the development' in this report. The footprint of the works and their immediate surroundings are hereafter referred to as the 'development boundary'.

2.3 Ecology Background

2.3.1 It is our understanding that no previous ecology reports have been completed for the proposed development.

2.4 Brief and Objectives

2.4.1 Arun Ecology Ltd were commissioned by the applicant to undertake a Preliminary Ecological Appraisal (PEA) for the development.

2.4.2 The key objectives of a PEA, as per CIEEM guidance (CIEEM, 2017) are as follows:

- Identify the likely ecological constraints associated with the development;
- Identify any mitigation measures likely to be required, following the 'mitigation hierarchy', as per BS42020:2013 Clause 5:2 (BSI, 2013);

- Identify any additional surveys that may be required to inform an Ecological Impact Assessment (ECiA); and

- Identify the opportunities offered by the development to deliver ecological enhancements and net gains for biodiversity.

2.4.3 The brief agreed with the applicant included:

- The undertaking of a desk study search obtaining records of designated sites, Habitats of Principle Importance (HPI) and ancient woodland as well as purchasing records of protected species and species of conservation concern;

- Undertake a UK Habitat Classification Survey (hereafter UKHab Survey) to record the habitats within the development boundary, assess their conservation value and suitability to act as ecological receptors for protected species and species of conservation concern, including a detailed assessment of the suitability of structures and trees to support roosting bats; and

- Provide a PEA report supported by digitized mapping that presents the methods and results of the desk study and the UKHab Survey within the development boundary. The report will also include an initial impact assessment of the development and any recommendations, including opportunities for ecological enhancement.

3. Method

3.1 Preliminary Ecological Appraisal

General Approach

3.1.1 The PEA was carried out in accordance with the CIEEM Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017) and the CIEEM Guidelines for Ecological Impact Assessment (CIEEM, 2018).

3.2 Desk Study

3.2.1 The study area for the desk study at this stage of the development is based upon a provisional *'zone of influence'*. *'The 'zone of influence'* is defined as per CIEEM guidance as *'the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities'* (CIEEM, 2018).

3.2.2 The provisional zone of influence for the development where data was sought is set as the following:

- RAMSAR, Special Conservation Areas (SACs) and Special Protection Areas (SPAs), (including potentially designated sites), Sites of Specific Scientific Interest (SSSI) and locally designated sites – 2 km;
- All other non-statutory designated sites – 1 km;
- Habitats of Principle Importance (HPI), Ancient woodland and Main Rivers – 2 km;
- Ponds – 0.5 km; and
- Protected Species, Species of Principle Importance (SPI) and other species of conservation concern – 1 km (from the last 20 years).

3.2.3 Sources of information within the study area for the desk study were as follows;

- The Multi-Agency Geographical Information for the Countryside (MAGIC);
- Government open-source GIS datasets;
- Horsham District Council Local Plan (2015);
- Satellite images (powered by google via QGIS 3.38); and
- Purchased records from Sussex Biodiversity Record Centre (SxBRC).

3.3 Field Habitat Survey

UK Habitat Classification Survey

3.3.1 The field survey was undertaken using the UKHab Survey methodology (UKHab, 2023a) to record the habitat types within the development boundary. The study area for the UKHab Survey was defined as all of the land within the development boundary (see Figure 2).

3.3.2 The UKHab Survey has 5 hierarchical levels of habitat classification that aligns with those outlined under national legislation and planning policy. Habitats were mapped in the field using the primary habitat codes described in the UKHab Survey Professional Edition to levels 3, 4 or 5 (UKHab, 2023b).

3.3.3 Secondary habitat codes and target notes were assigned along with primary habitat codes to provide additional context where the habitat contained additional features that deviate from the primary classification.

3.3.4 To identify each habitat, the dominant plant and other readily identified species were recorded and their abundance within the development boundary was measured using the DAFOR scale (Stace, 2019).

3.4 Site Habitat Suitability Assessment

General Approach

3.4.1 The habitat within the development boundary was appraised for its suitability to support protected species and species of conservation concern at the time of the field habitat survey with regard to the Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017) and BS42020:2013 Biodiversity – Code of Practice for Planning and Development (BSI, 2013). The species-specific guidance and references used in the appraisal are outlined in Table 1 below.

Table 1 – References used to assess the suitability of habitat within the development boundary to support protected species and species of conservation concern.

Group/ taxa	Habitat Appraisal References
Amphibians/ GCN	• GCN Habitat Suitability Index (Oldham et al. 2010); and • Great Crested Newt Conservation Handbook (Langton et al, 2001).
Bats	• Bat Conservation Trust Good Practice Guidelines (Collins, 2023).
Birds	• A Field Guide to Monitoring Nests (Ferguson-Lees et al, 2011); and • Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment (Shawyer, 2011).
Mammals	• Surveying Badgers (Harris et al, 1989) and Badger Trust Best Practice Guidelines (Badger Trust, 2023); • The Dormouse Conservation Handbook (Bright et al, 2006); • UK BAP Mammals Interim Guidance for Survey Methodologies, Impact Assessment and Mitigation (Cresswell, et al, 2012); • Otter (Woodroofe, 2007), Hedgehog (Morris, 2011); Water shrew (Carter, 2006) - Mammal Society Species Series; and • Water Vole Field Signs and Habitat assessment (Dean, 2022) and Water Vole Mitigation Handbook (Dean et al, 2016).
Reptiles	• Herpetofauna Workers' Manual (Gent & Gibson, 2003); and • Reptile Habitat Management Handbook (Edgar, 2010).
Invertebrates	• Good Planning Practice for Invertebrates (Buglife, 2015); and • Organising Surveys to Determine Site Quality for Invertebrates (English Nature, 2005).

Bats – Preliminary Roost Assessment

3.4.2 A bat preliminary roost assessment (PRA) of structures and trees as well as an assessment of the habitat within the development boundary for bats was carried out in accordance with the Bat Conservation Trust Good Practice Guidelines for Ecologists (Collins, 2023).

3.4.3 A ground level inspection of the exterior of any structures within the development boundary, and any trees that will be adversely impacted by the development, was undertaken with the aid of torchlight and binoculars to search for bat PRFs that might provide suitable crevices or access/egress points to voids or cavities for roosting bats.

3.4.4 Where accessible and safe to do so, a search for signs of bats such as bat specimens, droppings, urine staining and audible sound (such as social calls) was undertaken at each structure or tree. This included an internal inspection of roof voids at structures and the use of an endoscope to inspect any accessible bat PRFs.

3.4.5 A classification based upon the roosting suitability for bats was assigned for each structure and tree that was inspected within the development boundary as well as

the overall suitability of habitat. The classification descriptions are detailed below in Table 2 for structures and Table 3 for trees.

Table 2 – Suitability assessment for a proposed development site for bats, as adapted from BCT Good Practice Guidelines (Collins, 2023).

Potential Suitability	Definition	
	Roosting Habitat	Potential Flight Paths and Foraging Habitat
None	No habitat features on-site likely to be used by any roosting bats at any time of year (i.e. a complete absence of crevices/ suitable shelter at all ground/ underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/ protection for flight lines or that generates shelter for insect populations that is available to foraging bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats, however, small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roosting sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats).	Habitat that can be used by a small number of bats as flightpaths such as a gappy hedgerow or unvegetated stream but isolated i.e. not very well connected to the surrounding landscape by other habitats. Suitable, but isolated habitat that can be used by small numbers of foraging bats such as a lone tree (not in parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions, and surrounding habitat but unlikely to support a roost of high conservation status, with respect to roost type only, such as maternity or hibernation roosts.	Continuous habitat connected to the wider landscape that could be used by bats for flight paths such as lines of trees, scrub and linked back gardens and for foraging such as trees, scrub grassland and water.
High	A structure with one or more potential roosting sites that are obviously suitable for use by a larger number of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions, and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation sites.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined water courses and grazed parkland. The site is close to and connected to known bat roosts.

Table 3 – Guidelines for assessing the suitability of trees for bats, adapted from BCT Good Practice Guidelines (Collins, 2023).

Suitability	Definition
None	Either no PRFs in the tree or highly unlikely to be any present.
FAR	Further assessment required to establish if PRFs are present in the tree.
PRF	A tree with a least one PRF present.

3.4.6 For trees assigned the 'PRF' category, a further Ground Level Tree Assessment (GLTA) was undertaken. Each tree was inspected in detail from ground level to assess the suitability of individual PRFs to support roosting bats, to determine the overall availability of roosting resource, and to establish whether further survey is required. Each PRF was then assigned a suitability category, as outlined in Table 4.

Table 4 – Suitability categories for bat PRFs.

Suitability	Definition
PRF-I	The PRF is only suitable for individual bats or very small number of bats due to size or lack of suitable surrounding habitats.
PRF-M	The PRF is suitable for multiple bats and may therefore be used by a maternity colony.

3.5 Survey Dates and Conditions

3.5.1 Details on the date, timing and weather conditions recorded during the survey are provided below in Table 5.

Table 5– Field Survey Information.

Date	Survey Type	Survey Timings		Temperature (°C)		Rain	Wind (Beaufort scale)
		Start	Finish	Start	Finish		
13/10/2025	UK Hab Survey and bat PRA.	13:30	15:10	15	14	None	1

3.6 Surveyors

3.6.1 The field survey was undertaken by Amy Oldham BSc (Hons). Amy Oldham is adequately trained to carry out UKHab Surveys and is accredited under a level 1 class licence to survey bats.

3.7 Limitations

3.7.1 The UKHab survey was undertaken outside the optimal survey period for vascular plant identification (April–October). This is not considered a significant limitation to the conclusions of this report, as sufficient information was collected to accurately classify the habitats present within the development boundary in accordance with the UKHab Survey Methodology (UKHab, 2023a). The majority of the site comprised modified grassland, which was easily identifiable outside of the growing season, and other habitats present were likewise distinct and readily classified despite the timing of the survey.

4. Results

4.1 Desk Study

Designated Sites

4.1.1 The results of the desk study search for statutory and non-statutory designated sites are detailed below in Table 6 (see Figure 1).

Table 6 - Statutory and non-statutory designated sites returned from the desk study search.

Statutory and Non-Statutory Designated Sites			
Designation Level	**Site Name**	**Distance & Direction**	**Summary**
SSSI	Upper Arun	The Upper Arun designation is located 1.69 km west of the development boundary. The site falls within the SSSI IRZ.	The Upper Arun is a 13 km section of the River Arun, it flows south over New Bridge, Billingshurst and Pulborough. The Upper Arun is designated for its outstanding dragonfly assemblages.
SAC/SSSI	The Mens	The Mens designation is located 4.77 km west of the development boundary. The site falls within the SACs 6.5 km 'key conservation area'.	Designated due to its lowland broadleaved, mixed and yew woodland, and its assemblages of invertebrates and breeding birds. Barbastelle bat (*Barbastella barbastellus*) is also another qualifying feature of this designation.
SAC, SSSI, NNR	Ebernoe Common	Ebernoe Common designation is located 10.0 km west of the development boundary. The site falls within the SACs 12 km 'wider conservation area'.	Ebernoe Common SAC, SSSI and NNR covers approximately 233 ha. Ebernoe Common is designated for its beech forests, maternity colonies of Barbastelle, (*Barbastella barbastellus)* and Bechstein's bat (*Myotis bechsteinii*).
LWS	H14 – Wilden's Meadow	The LWS is located 0.84 km east of the development boundary.	Wilden's Meadow is approximately 3.2 ha in size and is located within the Horsham District. This site is designated due to its mosaic of grassland, woodland and pond habitats that support amphibians such as great crested newts (GCN).

LWS	H28 – Rosier Wood	The LWS is located 0.90 km southeast of the development boundary.	Rosier Wood is approximately 21 ha in size and is located within the Horsham District. Rosier Wood is an ancient and semi-natural woodland managed by coppicing. The site is designated due to its notable woodland fauna including breeding Nightingale, Hazel Dormice and White Admiral.

Ancient Woodland

4.1.2 There were nineteen ancient woodland parcels returned within 2 km of the development boundary (see Figure 1). The nearest ancient woodland parcel was 0.69 km south of the development boundary.

Habitats of Principle Importance

4.1.3 Details on the number of HPI, the habitat type and the distance from the development boundary to the closest HPI parcel are detailed in Table 7 and displayed in Figure 1.

Table 7 - Habitats of Principle Importance returned from the desk study search within 2 km of the development boundary.

Habitat of Principle Importance		
Habitat Type	**Number of HPI parcels within 2 km**	**Distance and direction of nearest HPI parcel and other notable parcels**
Deciduous woodland	56	• The nearest deciduous woodland parcel is located 0.16 km northeast of the development boundary.
Coastal and floodplain grazing marsh	3	• The nearest coastal and floodplain grazing marsh is 1.69 km northwest of the development boundary.
Traditional orchard	11	• The nearest traditional orchard is 0.24 km southwest of the development boundary.
Good quality semi-improved grassland	9	• The nearest good quality semi-improved grassland is located 0.90 km south of the development boundary.
No main habitat but additional habitats present	6	• These parcels include deciduous woodland, good quality semi-improved grassland and traditional orchard. • The nearest parcel of this category is 1.29 km east of the development boundary.

4.1.4 One pond was recorded within 0.5 km of the development boundary (see Figure 1), located 0.27 km southeast of the development boundary. There were no surveyed priority ponds within 2 km of the development boundary.

4.1.5 Four main river parcels were returned within 2 km of the development boundary (see Figure 1). None of the parcels were listed as priority river habitats under the national inventory. The nearest main river parcel is located 0.68 km southwest of the development boundary.

4.1.6 No European Protected Species Licences (EPSLs) have been granted within 1 km of the development boundary.

4.2 UK Habitat Classification Survey Results

4.2.1 The habitats recorded during the UKHab Survey within the development boundary are described below in Table 8 (see Figure 2 and Figure 3).

Table 8 - Habitats recorded within the development boundary during the UK Habitat Classification Survey.

Habitat Reference (Figure 2)	UK Hab Survey Classification Code	Approx. Area sqm	Summary and Species List
Urban			
Buildings B1-B3	**Primary:** Developed land, sealed surface **Secondary:** Building **Code:** u1b5	134 (total)	Three buildings (B1-B3) were recorded within the development boundary. Building B1 was a residential dwelling. Buildings B2 and B3 were wooden storage sheds with felt roofs. A detailed description of each building is provided in Table 11, Appendix I.
5 and 6	**Primary:** Built-up areas and gardens **Secondary:** Vegetated garden, scattered trees **Code:** u1 828 32	169	In the northwestern section of the site there was an area of vegetated garden. This parcel appears to be regularly mowed and is used as a residential garden. The majority of this parcel comprised a species poor modified grassland with a short sward height (approximately 200 mm) and had a species composition indicative of improvement. Non-native invasive variegated yellow archangel, listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) was recorded towards the northern development boundary around the base of the tulip tree. **Species recorded:** perennial rye grass (D), white clover (F), doves foot cranesbill (F), cocks foot (F), common ivy (F), dandelion (F), common daisy (O), Yorkshire fog (O), cleavers (O), sweet violet (O), bristly oxtongue (O), common selfheal (O), creeping buttercup (O), ragwort (O), common nettle (O), petty spurge (O), geranium sp. (O), variegated yellow archangel (O), broad-leaved dock (R), thyme-leaved speedwell (R), feverfew (R), grassland sedge (R), spear thistle (R). **Scattered trees:** Leyland cypress (R), tulip tree (R), ash (R).

7, 8 and 9	**Primary:** Built-up areas and gardens **Secondary:** Vegetated garden, introduced shrub, scattered trees **Code:** u1 828 847 32	77	In the southern section of the site there was an area of vegetated garden adjacent to the driveway. This parcel is regularly mowed and used as a residential garden. The majority of this parcel comprised a species poor modified grassland with a short sward height (approximately 100 mm) and had a species composition indicative of improvement. There were also introduced and ornamental shrubs on the border of the grassland as well as a small apple tree and some bramble. **Species recorded:** perennial rye grass (D), white clover (A), creeping cinquefoil (F), dandelion (F), creeping buttercup (O), broad-leaved dock (O), common selfheal (O), bristle oxtongue (O), common daisy (R), ragwort (R), cleavers (R). **Shrubs/ small trees:** bramble (O), cypress (O), phormium (R), euonymus japonicus (R), apple tree (R).
4	**Primary:** Developed land, sealed surface **Code:** u1b	320	There is an area of developed land, sealed surface comprised of a patio, garden path and driveway. No vegetation is associated with this habitat parcel.
Heathland and shrub			
H1	**Primary:** Non-native and ornamental hedgerow **Code:** h2b	20	There is a non-native ornamental hedgerow located along part of the north western and south western development boundaries, measuring approximately 20 m in length, 2 m in width and 2 m in height. The hedgerow was species poor and dominated by cherry laurel. The hedgerow canopy has a consistent dense structure that started <30 cm from the ground. **Species recorded:** **Canopy layer:** cherry laurel (D). **Ground layer:** common ivy (A), broadleaved dock (O), bramble (O), geranium sp. (O).

4.3 Site Habitat Suitability Assessment

4.3.1 An assessment of habitat within the development boundary to act as an ecological receptor for protected species and species of conservation concern, based upon the desk study results and the habitats recorded during the UKHab Survey is provided below in Table 9. The bat PRA results are summarised below, given in full in Table 11 Appendix I and displayed in Figure 4 and Figure 5. The GLTA results are summarised below and given in full in Table 12 Appendix II.

Table 9 – Site habitat assessment for protected species and species of conservation concern.

Species/Group	Site Assessment and Rationale
GCN and Other Amphibians	• Records of GCN were returned from the desk study search within 1 km of the development boundary. There was no potential GCN breeding habitat within the development boundary. There were no ponds within 0.25 km and just one pond within 0.5 km of the development boundary. This pond was located 0.27 km southeast of the development boundary and was separated by a number of roads. • No suitable breeding habitat for GCN was recorded within the development boundary. The non-native ornamental hedgerow within the development boundary provided limited suitability as potential resting or refuge habitat for GCN. The modified grassland within the development boundary at the time of the UKHab Survey provided unsuitable structure to be used as a permanent resting place for GCN with a sward height of <200 mm. Furthermore, the developed land, sealed surface and buildings within the development provide unsuitable habitat for GCN. • Given the distance of the development boundary to the nearest pond (0.27 km), the sub-optimal habitat within the development boundary, and negligible suitability of habitat within the main footprint of the works, the probability of GCN being encountered within the main footprint of the development is considered to be low.
Bats	• Records of bats (including SPI) were returned from the desk study search within 1 km of the development boundary. • Building B1 was classified as having moderate suitability for roosting bats during the PRA. Buildings B2 and B3 were classified as having negligible suitability to support roosting bats, during the bat PRA (see Table 11, Appendix I). Two trees that will be removed to facilitate the development were assessed as having suitability for roosting bats. Both trees had PRF-I features (see Table 12, Appendix II).

	• The habitat within the development boundary includes a non-native ornamental hedgerow, trees and modified grassland that provide sub optimal foraging and commuting habitat (flightlines) for bats and that connects continuously to the wider landscape. The habitat within the development boundary was assessed as having low suitability for bats, in-line with BCT Good Practice Guidelines (Collins, 2023). As such, commuting and foraging bats could be encountered within the development boundary.
Birds	• Several records of birds including species of conservation concern were returned from the desk study search within 1 km of the development boundary. • There are trees, non-native and ornamental hedgerows, introduced shrubs and buildings within the development boundary that provide suitable habitat for nesting birds. The vegetated garden within the development is reasonably unlikely to be suitable for ground nesting birds due to its short sward height. • The overall quantity and quality of available habitat for nesting birds within the footprint of the development is insufficient to support important bird assemblages and populations of conservation concern.
Terrestrial mammals (non-bats)	• [redacted] • **Hazel dormice:** Records of hazel dormice were returned from the desk study search within 1 km of the development boundary. The habitat within the development boundary was primarily formed of vegetated garden and developed land, sealed surface that provides an unsuitable habitat type for hazel dormice. There was a non-native ornamental hedgerow within the development boundary which is broadly a habitat that can be used by hazel dormice. However, due to its simplified structure, non-native species composition, and limited connectivity to other suitable dormice habitats, it is considered reasonably unlikely that hazel dormice would be present within the development boundary. • **Hedgehogs:** The non-native and ornamental hedgerows within the development boundary are reasonably likely to provide foraging and resting places for hedgehogs. The vegetated garden parcels within the development boundary also provide suitable foraging habitat for hedgehogs. As such, it is reasonably likely that hedgehog could be encountered within the development boundary and the immediate footprint of the development. • **Otters and water voles:** No records of water vole were returned from the desk study search within 1 km of the development boundary. Otter records were not included by SxBRC. The nearest water body was located 0.68 km from the development boundary and is

	separated by several roads. Based on the habitats recorded within the development boundary and the connectivity and distance of these habitat to the nearest waterbody, it is reasonably unlikely otter or water vole will be encountered within the development boundary or that the habitat will be associated with any population of these species. • **Other mammals:** No mammal burrows such as those of rabbit or fox were recorded within the development boundary at the time of the UKHab Survey. Habitats recorded within the development boundary such as non-native and ornamental hedgerows could conceal such burrows. As such, it is possible the above species could be found in or near to the main footprint of the development prior to its commencement.
Reptiles	• Records of common reptiles were returned from the desk study search within 1 km of the development boundary. • The main extent of habitat within the development boundary is formed of short, modified grassland which provides insufficient structure and cover to support a permanent reptile population. The structure of the modified grassland also results in a poor interface between other habitats such as the non-native ornamental hedgerow, shrubs and trees. All other habitat within the development boundary including developed land, sealed surface and buildings provided unsuitable habitat for reptiles. • Based on the above points, it is reasonably unlikely that a permanent population of reptiles will be present within the development boundary or that individual reptiles will be encountered within the footprint of the development.
Invertebrates	• Several records of invertebrates including species of conservation concern were returned from the desk study search within 1 km of the development boundary. The modified grassland and non-native ornamental hedgerow within the main footprint of the development lacked botanical diversity and environmental heterogeneity, and as such, only offer limited value for invertebrates at a site level. No water bodies were recorded within the development boundary and as such, aquatic favouring species of conservation concern are reasonably unlikely to be encountered within the development boundary. • There were small areas of vegetated garden which provided habitats of limited value for invertebrates due to the small scale and lack of overall botanical diversity in these parcels.
Plants, Lichens and Fungi	• No European or nationally protected plants, SPI or other species of conservation concern were recorded within the development boundary.
Non-native and Invasive Species	• A species listed under Schedule 9 of the Wildlife & Countryside Act, 1981 (variegated yellow archangel) was recorded within the development boundary at the time of the UKHab Survey.

5. Legislation and Planning Policy

5.1.1 A summary of the relevant legislation and planning policy that could be a material consideration to the development is provided below in Table 10. Further details of the UK legislation and planning policy relevant to the qualifying features in this section are detailed in Appendix II.

Table 10 – Legislation and planning policy evaluation of the development.

Ecological Feature	Relevant Legislation & Planning Policy	Impact Assessment and Legal Compliance	Rationale and Comments
Designated sites			
Upper Arun SSSI	• Conservation of Habitat & Species Regulations, 2017; • National Planning Policy Framework, 2024; and • HDC Local Plan – Policy 25 and 31	Compliant/ adverse impacts reasonably unlikely	• Due to the small scale, extent and magnitude of the development as well as it's distance to the designation, there will be no direct loss of area within the designation, and it is reasonably unlikely that there will be any adverse impacts due to degradation that might arise from increased recreational pressure or pollution. • Based on the above points, in our professional opinion, further consultation with Natural England regarding any adverse impacts on the Upper Arun SSSI designation will not be required.

The Mens SAC/SSSI	• Conservation of Habitat & Species Regulations, 2017;
	• National Planning Policy Framework, 2024; and
	• HDC Local Plan – Policy 25 and 31.
		Mitigation required	• The development boundary falls within the 6.5 km key conservation zone for The Mens SAC. The development, however:
			  ○ Will not result in the loss of any area of habitat within the SAC as it is located outside of the SAC boundary; and
			  ○ Will not directly remove any habitat within the development boundary that could provide a suitable flightline for a qualifying feature of the SAC (barbastelle bat).

			• While it is reasonably unlikely alone to adversely impact the qualifying features of the designation, the artificial lighting of important bat flightlines within the conservation zone of the SAC, such as the non-native ornamental hedgerow within the development boundary could have an accumulative adverse impact locally on the available flightlines for barbastelle bat. • The recommendations outlined in section 6 should be followed to ensure the development proceeds lawfully.
Ebernoe Common SAC/SSSI/NNR	• Conservation of Habitat & Species Regulations, 2017; • National Planning Policy Framework, 2024; and • HDC Local Plan – Policy 25 and 31.	Mitigation required	• The development boundary falls within the 12 km wider conservation area for Ebernoe Common SAC. • The qualifying features of Ebernoe Common SAC include Barbastelle, (*Barbastella barbastellus)* and Bechstein's bat (*Myotis bechsteinii*). • For the reasons outlined above for The Mens SAC it is reasonably unlikely that the development will result in any adverse impacts on Ebernoe Common SAC. • Based on the above points, in our professional opinion, further consultation with Natural England regarding any adverse impacts on the Ebernoe Common designation will not be required. • The recommendations outlined in section 6 should be followed to ensure the development proceeds lawfully.

H14 – Wilden's Meadow LWS	• HDC Local Plan – Policy 25 and 31	Compliant/ adverse impacts reasonably unlikely	• The development will not result in any adverse impacts to the qualifying features of the Wilden's Meadow LWS due to: o The development being retained within the development boundary and not resulting in any direct loss of area within the designation; and o The development being small in scale, extent and magnitude as well as there being sufficient distance between Wilden's Meadow LWS and the development boundary, to avoid any adverse impacts that may arise from degradation as a result of increased recreational pressure or pollution.
H28 – Rosier Wood LWS	• HDC Local Plan – Policy 25 and 31	Compliant/ adverse impacts reasonably unlikely	• The development will not result in any adverse impacts to the qualifying features of the Rosier Wood LWS due to: o The development being retained within the development boundary and not resulting in any direct loss of area within the designation; and • o The development being small in scale, extent and magnitude as well as there being sufficient distance between the Rosier Wood LWS and the development boundary, to avoid any adverse impacts that may arise from degradation as a result of increased recreational pressure or pollution.
Habitats			
Irreplaceable habitat	• National Planning Policy Framework, 2024; and • HDC Local Plan – Policy 25 and 31.	Compliant/ adverse impacts reasonably unlikely	• No ancient woodland parcels or any other type of irreplaceable habitat are located within the development boundary or will be directly lost as part of the development. • Due to the small scale, extent and magnitude of the development and its distance to any ancient woodland parcels, it is reasonably unlikely that there will be any adverse impacts resulting from degradation through increased recreational pressure or pollution to ancient woodland outside of the development boundary.

Habitats of Principle Importance	• Natural Environment & Rural Communities Act, 2006 – Section 41; • National Planning Policy Framework, 2024; and • HDC Local Plan – Policy 25 and 31.	Compliant/ adverse impacts reasonably unlikely	• No HPI were recorded within or directly adjacent to the development boundary • For the reasons outlined above for ancient woodland it is not anticipated that there will be any adverse impacts on HPI located outside of the development boundary.
Trees	• HDC Local Plan – Policy 25 and 31.	Mitigation required	• There is a mature ash tree and a mature oak tree within the development boundary that are to be retained as part of the development. • Mitigation will be required within the design of the development to ensure the retention of the above feature where reasonably practical. Mitigation will also be required during the construction phase of the development to prevent any damage and degradation to the retained tree. • The recommendations outlined in section 6 of this report should be followed to ensure the development is compliant with local planning policy.
Pollution Prevention	• Environmental Protection Act, 1990; and • National Planning Policy Framework, 2024.	Mitigation required	• The level of pollution generated from the development is anticipated to be low due to the small scale of the development, however, pollution prevention measures should be incorporated into the construction phase of the development to avoid onsite and offsite pollution to habitats and the nearby waterbodies. • Mitigation measures will be required within the design of the development to ensure that there are no significant increases in the levels of light pollution as a result of the installation of artificial lighting as part of the development. • The recommendations outlined in section 6 should be followed to ensure the development proceeds lawfully.
Biodiversity Net Gain and Ecological Enhancements			
Biodiversity Net Gain	• The Environment Act, 2021; and • National Planning Policy Framework, 2024.	Further assessment required	• The development will be required to achieve measurable net gains for biodiversity as defined by The Environment Act, 2021.

			• The recommendations outlined in section 6 with respect to Biodiversity Net Gain (BNG) should be followed to ensure the development proceeds lawfully.
Ecological Enhancement	• National Planning Policy Framework, 2024; and • HDC Local Plan – Policy 25 and 31.	Further action required.	• The development will be required to implement ecological enhancements into the design of the development to ensure it is compliant with national and local planning policy. • The recommendations outlined in section 6 of this report should be followed to ensure the development is compliant with national and local planning policy.
Protected Species and Species of Conservation Concern			
[redacted]	[redacted]	[redacted]	[redacted]
Bats	• Conservation of Habitat & Species Regulation, 2017; • Wildlife & Countryside Act, 1981 – schedule 5; and • Natural Environment & Rural Communities Act, 2006 – Section 40/41.	Further assessment and mitigation required	• Building B1 was classified as having moderate suitability for roosting bats. As this building will be demolished, the development could result in harm to individual bats and adversely impact their roosts without further assessment for bats. As such, further bat emergence surveys are required to determine the presence or likely absence of bats. • There were no other buildings with suitability for roosting bats within the development boundary. • Two trees (T1 and T2) with PRF-I suitability for roosting bats will be removed to facilitate the development, based on the current development layout (see Table 12, Appendix II). Mitigation will be required prior and during their removal.

			• A section (20m) of non-native hedgerow will be lost to facilitate the development. Given the residential context of the site and the availability of alternative linear features in the surrounding landscape (including tree lines and hedgerows), the removal of this short section of hedgerow is unlikely to result in the severance of any key bat commuting or foraging routes. • For the reasons outlined above for The Mens SAC, Ebernoe Common SAC and pollution prevention section, the development will be required to mitigate the level of new light pollution from the installation of artificial lighting to ensure it does not adversely impact potential bat flightlines within the development boundary. • The recommendations outlined in section 6 should be followed to ensure the development proceeds lawfully.
Birds	• Wildlife & Countryside Act, 1981 – Section 1 and Schedule 1; and • Natural Environment & Rural Communities Act, 2006 – Section 40/41.	Mitigation required	• The development includes the removal of building B1, B2, B3 and B4 and the removal of trees which provide potential habitat for nesting birds. As such, nesting birds could be adversely impacted without appropriate mitigation during the construction phase of the development. • It is reasonably unlikely that significant assemblages or populations of birds, including SPI, will be adversely impacted by the development. • The recommendations outlined in section 6 of this report should be followed to ensure the development proceeds lawfully.
Great crested newts	• Conservation of Habitat & Species Regulations, 2017; • Wildlife & Countryside Act, 1981 – schedule 5; and • Natural Environment & Rural Communities Act, 2006 – Section 40/41.	Compliant/ adverse impacts reasonably unlikely	• It is reasonably unlikely that the development will result in harm to individual GCN or adversely impact any breeding or terrestrial habitat associated with any GCN population given the absence of potential GCN breeding habitat within 250 m of the development boundary and the habitats recorded within the development boundary.

Hazel dormice	• Conservation of Habitat & Species Regulations, 2017; • Wildlife & Countryside Act, 1981 – schedule 5; and • Natural Environment & Rural Communities Act, 2006 – Section 40/41.	Adverse impacts/ offence reasonably unlikely.	• The development is reasonably unlikely to result in harm to individual hazel dormice or adversely impact any habitat associated with any hazel dormouse populations.
Hedgehogs	• Natural Environment & Rural Communities Act, 2006 - Section 40/41; and • Wild Mammals (Protection) Act, 1996.	Mitigation required	• It is reasonably likely that individual hedgehogs could be encountered within the development boundary, and as such, it is possible that they could be inadvertently killed with methods prohibited under the Wild Mammals (Protection) Act, 1996 without appropriate mitigation. • The recommendations outlined in section 6 should be followed to ensure the development proceeds lawfully.
Reptiles	• Conservation of Habitat & Species Regulations, 2017 (Sand Lizard & Smooth Snake only); • Wildlife & Countryside Act, 1981 – schedule 5; and • Natural Environment & Rural Communities Act, 2006 – Section 40/41.	Adverse impacts/ offence reasonably unlikely	• The development is reasonably unlikely to result in harm to individual reptiles and will not result in the loss of any habitat with suitability to support a permanent reptile population.
Other Mammal Burrows	• Wild Mammals Protection Act, 1996.	Mitigation required	• It is possible that mammals could be inadvertently harmed with methods prohibited under the Wild Mammals Act, 1996 whilst inhabiting their burrows without appropriate mitigation. • To ensure the development proceeds lawfully the mitigation outlined in section 6 should be followed.

Otters	• Conservation of Habitat & Species Regulation, 2017; • Wildlife & Countryside Act, 1981 – schedule 5; and • Natural Environment & Rural Communities Act, 2006 – Section 40/41.	Adverse impacts/ offence reasonably unlikely	• The development is reasonably unlikely to result in harm to individual otters or adversely impact their habitat (including resting and breeding places), and therefore, will not adversely impact the favourable conservation status of this species.
Water Voles	• Wildlife & Countryside Act, 1981 – schedule 5; and • Natural Environment & Rural Communities Act, 2006 – Section 40/41.	Adverse impacts/ offence reasonably unlikely	• The development is reasonably unlikely to result in harm to individual water vole or adversely impact their burrows or habitat, and therefore, will not adversely impact the conservation status of this species.
Invertebrates	• Conservation of Habitat & Species Regulations, 2017 – Schedule 2; • Wildlife & Countryside Act, 1981 – Schedule 5; and • Natural Environment & Rural Communities Act, 2006 – Section 40/41.	Compliant/ adverse impacts reasonably unlikely	• The development is reasonably unlikely to result in any adverse impacts to any European protected invertebrates, nationally protected species, important populations of SPI or nationally or locally important assemblages of conservation value.
Invasive non-native species	• Wildlife & Countryside Act, 1981 – Schedule 9; and • Invasive Alien Species Order, 2019.	Mitigation required	• A Schedule 9 listed species was recorded within the immediate footprint of the development. • Mitigation will be required during the construction phase to ensure its safe removal and disposal from the site. • The recommendation outlined in section 6 should be followed to ensure the development proceeds lawfully.

Protected Plants, Fungi and Lichens	• Conservation of Habitat & Species Regulations, 2017 – Schedule 5; • Wildlife & Countryside Act, 1981 - Schedule 8; and • Natural Environment & Rural Communities Act, 2006 – Section 40/41.	Adverse impacts/ offence reasonably unlikely	• The development is reasonably unlikely to result in intentional picking, uprooting, destruction, or intentional clearance of any wild plant, fungi or lichen, including, European protected species, nationally protected species, SPI or those of national or local conservation concern.

6. Requirements and Recommendations

6.1 Background

6.1.1 The recommendations included in this section are based upon the mitigation hierarchy (avoidance, mitigation, and compensation; BSI, 2013) and takes consideration of government circular: Biodiversity and Geological Conservation Circular 06/2005.

6.1.2 Mitigation is not discussed where further surveys are required to inform such mitigation or compensation, unless in our professional judgement it would not be proportionate to request further surveys as the risk of a legal offence being committed as a result of the development is acceptably low.

6.2 Designated sites

The Mens SAC and Ebernoe Common SAC

6.2.1 To ensure the development avoids adverse impacts on bat foraging and commuting habitats that are located within the development boundary, immediately adjacent to the site and that fall within The Mens SAC 6.5 km or Ebernoe Common SAC 12 km zone of influence, any lighting as part of the proposed development should be installed in line with current guidance issued by the Bat Conservation Trust and Institute of Lighting Professionals: Guidance Note 08/23: Bats and Artificial lighting in the UK (BCT & ILP 2023).

6.2.2 The lighting strategy for the site as a minimum should aim to:

- Minimise the overall levels of light pollution within the site as a result of the development by:
    - Selecting appropriate lighting sources such as LED lighting that lack UV components, have peak wavelengths higher than 550 nm and that have a warm white light (2,700 kelvin or lower);
    - Appropriate fitting of lighting to include horizontal mounting with no light output above 90° and/or no upward tilt, or as a last resort the use of baffles, hoods or louvres to reduce light spill and direct lighting to only where it is needed;
    - Using light only when necessary, within the site, by using timers and motion sensors; and

- Providing natural screens in landscaping plans to break up artificial light where light spill cannot be avoided.

6.3 Biodiversity Net Gain and Ecological Enhancements

Biodiversity Net Gain

6.3.1 A BNG assessment for the development should be undertaken within the development boundary to ensure the development is compliant with the legislation and national planning policy requirements.

6.3.2 The BNG assessment should follow industry good practice guidelines and the principles of BNG (Baker et al, 2019 and CIEEM, 2021) and be calculated based upon the final landscaping plans using the latest edition of the Statutory Biodiversity Metric Tool.

6.3.3 The BNG assessment should be accompanied by a BNG Gain Plan and Habitat Management and Monitoring Plan (where appropriate) and should outline the strategy for achieving biodiversity net gain over a defined 30-year period.

Ecological Enhancements

6.3.4 The following ecological enhancements relevant to the development are recommended:

- Installation of artificial habitat provisions to include:
  - One integrated bee brick to be installed as part of each of the new proposed dwellings;
  - One bat box to be installed on a suitable mature tree within the development boundary; and
  - One integrated bird box to be installed on each of the replacement dwellings.
- The planting of native trees and shrubs as part of the developments landscaping plans; and
- The incorporation of two 13 cm x 13 cm gaps into any permanent boundary fencing of each residential garden to allow the movement of small animals including hedgehogs.

6.4 Habitat Mitigation

Trees

6.4.1 To safeguard the retained mature ash tree and mature oak tree within the development boundary from damage or degradation during the construction phase and operational phase of the development, the root protection zones of the retained trees will need to be considered, and professional arboricultural advice will likely need to be sought.

Pollution Prevention

6.4.2 The following pollution prevention measures should be incorporated during the construction phase of the development to ensure that there is not any on-site or offsite pollution:

- Safe storage of fuels, oils and chemicals within the development boundary (such as on hardstanding) with appropriate spill kits (for the scale of activities) available on-site at all times;
- Appropriate locating and storage of construction materials outside of the root protection zone of woodland and trees within the development boundary;
- Safe disposal of any contaminated water or soil and general waste within the development boundary or with appropriate offsite management;
- Appropriate locating of mixing stations and inclusion of dust prevention measures where required within the development boundary;
- Monitoring and prevention of water and silt run-off from construction areas including the installation of silt traps where appropriate; and
- Where possible the use of fertiliser and herbicides should be minimised as part of on-going site management.

Invasive Non-Native Species (INNS)

6.4.3 The following mitigation measures should be followed during the construction phase of the development to ensure that there is no further spread of the identified Schedule 9 listed species (variegated yellow archangel):

- Variegated yellow archangel plants should be carefully dug up, ensuring all vegetative material, including roots and stolons are removed. The plant can easily break up when disturbed and can regenerate quickly, therefore all plant material must be removed.

- All removed INNS plant material should be treated as controlled waste and disposed of appropriately through registered waste carriers or at authorised facilities to prevent spread.

- All tools, machinery, and footwear should be cleaned after working in infested areas to remove soil and plant fragments that could facilitate the plant's spread.

6.5 Protected Species Mitigation

[redacted] Mammal Burrows

6.5.1 In the unlikely event that a burrow entrance of a mammal is discovered within the development boundary that could be of a suitable size [redacted] the following actions should be taken:

[redacted]

[redacted]

[redacted]

[redacted]

Bats

6.5.3 To ensure the development avoids adverse impacts on flightlines for bats, the recommendations outlined for The Mens SAC and Ebernoe Common SAC in section 6.2 should be followed.

6.5.4 Trees T1 and T2 were assessed as having precautionary PRF-I classification during the GLTA. Immediately prior to removal, the trees should undergo a pre-works inspection by a suitability qualified ecologist. Following inspection, if required, they should be soft felled, under the supervision of an appropriately qualified ecologist,

in line with best practice guidelines for tree classified under the PRF-I category for roosting bats.

Nesting Birds

6.5.5 To ensure that the development is compliant with the legislation and planning policy relating to nesting birds, the removal of building B1 and any trees within the development boundary should ideally be completed outside of the breeding bird season (typically March – September). If it is not possible to avoid the breeding bird season to complete these works, a pre-works inspection by an appropriately qualified ecologist should be undertaken.

6.5.6 If an active bird nest or nesting activity is recorded within the development boundary during the pre-works inspection or at any other time during the development (such as the storage of building materials) the nest should be protected from damage and destruction (including disturbance that may cause the nest to be abandoned). A protective buffer should be implemented around any active nests (the size to be determined based on the professional judgement of an ecologist or environmental manager) and works in and around these areas should be controlled or delayed until the chicks have fledged.

Hedgehogs

6.5.7 Where reasonably practical, measures should be taken to avoid the unnecessary killing or injuring (that could result in undue suffering and harm) of hedgehog as a result of the developments construction-based activities. Stakeholders and contractors should remain vigilant for the presence of hedgehogs around any vegetation, debris or stored materials. A reasonable action would be to move an individual hedgehog to a safe location either within retained habitat on-site or off-site. During the construction phase of the development, any excavations on site should be covered nightly or include a suitable escape ramp to prevent nocturnal mammals (including hedgehog) from becoming trapped.

6.6 Further Surveys

Bats

6.6.1 Based on the current design of the development, further surveys on building B1 should be undertaken to determine the presence or likely absence of bats in line with BCT Good Practice Guidelines (Collins, 2023).

6.6.2 Building B1 was classified as having moderate suitability for roosting bats, therefore two bat emergence surveys are required to determine the presence or likely absence of bats.

6.6.3 The bat emergence surveys should be completed between May and September, with a minimum of two surveys completed between May – August. The surveys should be separated by a minimum of 21 days.

7. Conclusion

7.1.1 Further assessment will be required to inform the ecological impacts of the development. Mitigation will also be required within the design and the construction phase of the development to ensure it proceeds lawfully. Furthermore, the development will be required to incorporate ecological enhancements into the development.

7.1.2 The recommendations within this report outline how the above can be achieved to inform the development and ensure it proceeds lawfully.

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Appendix I - Bat Preliminary Roost Assessment Results

Table 11 – Bat Preliminary Roost Assessment Results.

Building no.	Description	External Inspection	Internal inspection	Evidence of bats	Bat roost potential	Rational and potential roosting features recorded
B1	• Building B1 is a two-storey brick-built residential dwelling with timber cladding on the upper exterior. • Building B1 has an internal loft void used for storage.	Yes	Yes	None recorded	Moderate	• The following bat PRFs and access/egress points were recorded on building B1: ○ Gaps into void behind wooden cladding; ○ Gaps between wooden cladding; ○ Gaps between roof tiles; and ○ Internal loft void.
B2	• Building B2 is a wooden shed used for storage.	Yes	No	None recorded	Negligible	• No bat PRFs or potential access/ egress points were recorded on the exterior of building B2, and as such, there is no access to the interior of building B2 for bats.
B3	• Building B3 is a wooden shed used for storage.	Yes	No	None recorded	Negligible	• No bat PRFs or potential access/ egress points were recorded on the exterior of building B3, and as such, there is no access to the interior of building B3 for bats.

Appendix II – Ground Level Tree Assessment Results

8.1.32 The results of the GLTA are presented in Table 12. Tree ID numbers correspond to those used in the submitted Arboricultural Report (Barry Holdsworth Ltd, 2025).

Table 12– Bat Ground Level Assessment Results.

Tree ID	Species	Life Stage	Height	Potential roosting features (Type, height, aspect and dimensions of access/egress point)	Evidence of bats	Tree suitability classification	Roost suitability classification
T1	Leyland Cypress	Early-mature	10 m	No PRFs were recorded during the GLTA. However, tree T1 was given precautionary PRF-I classification due to the position of the tree against the boundary fence preventing an inspection of the northern aspect of the tree. However, based on the condition and age of the tree and an inspection of the visible limbs, it is considered reasonably unlikely that PRF-M features would be present.	No	PRF	PRF-I (precautionary)
T2	Tulip tree	Semi-mature	13 m	No PRFs were recorded during the GLTA. However, tree T2 was given precautionary PRF-I classification due to the presence of ivy obscuring the main trunk. Based on the condition and age of the tree and an inspection of the visible limbs, it is considered reasonably unlikely that PRF-M features would be present.	No	PRF	PRF-I (precautionary)

Appendix III – Legislation & Planning Policy

8.2 Background

8.2.1 This section provides a summary of the legislation and planning policy that could be relevant to the development. Where possible we have limited this section to the areas relevant to this report. This means the legislation and planning policy outlined below is not included in its entirety.

8.2.2 This section does not constitute legal advice, and only, represents the interpretation and professional judgement of the ecologists named in this report, on the legislation and planning policy deemed relevant to the development.

8.3 RAMSAR Convention

8.3.1 RAMSAR sites are wetlands of international importance that have been designated under the criteria of the RAMSAR Convention on Wetlands for containing representative, rare or unique wetland types or for their importance in conserving biological biodiversity (JNCC, 2019).

8.3.2 The National Planning Policy Framework (NPPF, 2024) outlines the level of consideration that should be given to RAMSAR sites in Planning. Paragraph 187 states that RAMSAR and potential RAMSAR sites should be given the same protection as 'habitat sites' defined as those afforded protection under the Conservation of Habitat and Species Regulations (2017), such as Special Protection Areas or Special Areas of Conservation.

8.4 Conservation of Habitat and Species Regulations, 2017

8.4.1 The Conservation of Habitats and Species Regulations, 2017 transposes the EC Habitats Directive and some elements of the EC Bird Directive into national law in England and Wales. The objective of the Habitats Directive is to protect biodiversity through the conservation of natural habitats and species of wild fauna and flora. The directive lays down rules for the protection, management and exploitation of such habitats and species.

Protected Species

8.4.2 The regulations include provisions that prohibit certain actions from the protection of species listed under Annex II of the Habitat Directive. It is a criminal offence for a person to 'intentionally or recklessly' take the following action:

- Deliberately capture, injure or kill any wild animal of a European Protected Species (EPS);

- Deliberately disturb wild animals of any such species in such a way as to be likely to affect significantly the local distribution or abundance of the species to which they are likely to belong;
- Deliberately take or destroy eggs of any such wild animal;
- Deliberately pick, collect, uproot or destroy a wild plant of an EPS; and
- Keep transport, sell or exchange, or offer for sale or exchange, any live or dead wild animal or plant of an EPS, or any part of or anything derived from such an animal or plant.

8.4.3 The disturbance of such animals includes in particular; any disturbance that is likely to impact their ability;

- To survive, to breed or reproduce, or to rear or nurture their young;
- In case of animals of a hibernating or migratory species, to hibernate or migrate; or
- To affect significantly the local distribution or abundance of the species to which they belong.

Protected Sites

8.4.4 The Conservation of Habitats and Species Regulations, 2017 puts an obligation on the appointed appropriate authority for England & Wales to establish priorities for a network of nationally important sites.

8.4.5 The aforementioned sites, often referred to as European protected sites are formed of two types of sites, Special Protection Areas (sites specifically designated for birds) and Special Areas of Conservation (specifically designated for fauna and flora). The objective is for all species and habitats covered by these sites to contribute towards the maintenance and restoration of their favourable conservation status.

8.4.6 Designation can include but is not limited to the following reasons:

- A natural habitat type specified in Annex I of the Habitat Directive;
- A species specified in Annex II of the Habitats Directive;
- For the coherence of the national network of protected sites; and
- For threats of degradation or destruction to which the sites are exposed.

8.5 Wildlife and Countryside Act, 1981 (as amended)

8.5.1 The Wildlife and Countryside Act, 1981 (as amended) primarily transposes the UK Governments obligations under the Bird Directive and Bern Convention into law. The act outlines provisions for the protection of nationally important sites for nature conservation and provides protection at different levels for certain animals and plants, including certain prohibitions.

Protection of Birds

8.5.2 Part 1 – Section 1 includes certain prohibitions for the protection of birds which make it a criminal offence for a person to:

- Intentionally kill, injure or take any wild bird;
- Intentionally take, damage, or destroy the nest of any wild bird while it is in use or being built;
- Intentionally take or destroy the egg of any wild bird;
- Have in any one's possession or control any egg or part of an egg which has been taken in contravention of the Act or the Protection of Birds Act, 1954;
- Use traps or similar items to kill, injure or take wild birds;
- Have in one's possession or control any bird of a species occurring on schedule 4 of the Act unless registered, and in most cases ringed, in accordance with the secretary of state's regulations; and
- Intentionally or recklessly disturb any wild bird listed on Schedule 1 while it is nest building, or at a nest containing eggs or young, or disturb the independent young of such a bird.

Protection of Animals

8.5.3 Part 1 – Section 9 of the act includes certain prohibitions for the protection of certain animals named in schedule 5. In summary offences include:

- If any person intentionally or recklessly kills, injures or takes any wild animal included in schedule 5;
- If any person has in his possession or control any live or dead wild animal included in schedule 5, or any part of, or anything derived from, such an animal;

- If any person intentionally or recklessly damages or destroys, or obstructs access to, any structure or place which any wild animal included in schedule 5 uses for shelter or protection; or

- Disturb any such animal while it is occupying a structure or place which it uses for that purpose; and

- Sells, offers or exposes for sale, or has in their possession or transports for the purpose of sale, any live or dead wild animal included in schedule 5, or any part of, or anything derived from, such an animal, or publishes or causes to be published any advertisement likely to be understood as conveying that they buy or sell, or intends to buy or sell, any of those things.

Protection of Plants

8.5.4 Part 1 – Section 13 includes certain prohibitions for the protection of certain wild plants named in schedule 8. In summary offences include if any person:

- Intentionally picks, uproots or destroys any wild plant included in schedule 8, or not being an authorised person, intentionally uproots any wild plants not included in that schedule;

- Sells, offers or exposes for sale, or has in their possession or transports for the purpose of sale, any live or dead wild plant included in schedule 8, or any part of, or anything derived from, such a plant; or

- Publishes or causes to be published any advertisement likely to be understood as conveying that they buy or sell, or intends to buy or sell, any of those things.

Invasive Species

8.5.5 Part 1 – Section 14 includes certain prohibitions for the introduction of certain invasive species named in schedule 9 of the act. In summary offences include if any person:

- Subject to the provisions of this part, (a) if any person releases or allows to escape into the wild any animal which is of a kind which is not ordinarily resident in and is not a regular visitor to Great Britain in a wild state; or (b) is included in Part of Schedule 9; and/ or

- Subject to the provisions of this part, any person who plants, or otherwise causes to grow, any plant in the wild at a place out with its native range is guilty of an offence.

Sites of Specific Scientific Interest

8.5.6 Part 2 – Sections 28-33 of the act set out the law regarding Sites of Specific Scientific Interest (SSSI) by the conservation bodies in England (Natural England) and Wales (Natural Resource Wales) and outlines the offences with respect to SSSI.

8.5.7 The offences outlined in the act apply to any person(s), public body, landowner or occupier as well as statutory undertakers or permitted developments. Examples of offences include (but are not limited to):

- Any person intentionally or recklessly damaging or destroying any of the features of special interest of an SSSI, or disturbing wildlife for which the site was notified;
- Public bodies are not allowed to carry out damaging operations on an SSSI, except where they notified the relevant conservation agency. It is also an offence for a public body to fail to minimise damage on an SSSI or – if damage occurs – to fail to restore a SSSI to its former state; and
- Statutory bodies have a general duty to take reasonable steps to further to conservation and enhancement of the special feature of SSSI's;
- Where statutory bodies propose to undertake or permit activities that could affect a SSSI they must consult the relevant statutory nature conservation agency. If the activity cannot be avoided it must be undertaken in a way least damaging to the SSSI; and
- If you are the owner or occupier of a SSSI, it is an offence to carry out any activity that may likely damage the SSSI without consent from the relevant conservation agency. The law requires that you inform the conservation agency of any changes in the ownership or occupancy.

Other Protected Areas

8.5.8 Part 2 – Section 34 to 52 of the act deals with other protected areas within the UK such as limestone pavements, national nature reserves and marine nature reserves. The act allows designation of these sites by the appropriate authority for the purpose of conserving flora and fauna or geological or physiological features of specific interest in an area to protect the site. Furthermore, the act prohibits certain actions in National Parks for certain habitats without consent from local authorities.

8.6 Countryside Right of Ways Act, 2000

8.6.1 The Countryside Right of Ways Act, 2000 (CRoW Act, 2000) makes provisions for public access, amends the law for public rights of ways and amends existing law on

nature conservation and the protection of wildlife as well as makes further provisions for Areas of Outstanding Natural Beauty.

Wildlife Legislation

8.6.2 Part III of the CRoW Act, 2000 includes provisions for wildlife protection and nature conservation and includes amendments to the Wildlife & Countryside Act, 1981.

8.6.3 Schedule 9 of the CRoW Act, 2000 increases powers for the protection and management of SSSI. There are increased powers for appropriate authorities to secure management agreements for SSSI. A duty is placed on public bodies to have regard for the continued conservation and enhancement of SSSI. Furthermore, there are increased penalties for the prosecution of wildlife crime, including for third parties that damage SSSI.

8.6.4 Schedule 12 of the CRoW Act, 2000 makes certain offences under the provision of the Wildlife and Countryside Act, 1981 arrestable. Greater powers are given to police and appointed wildlife inspectors under the CRoW Act, 2000 and enables heavier penalties for the prosecution of wildlife crime.

8.7 National Parks and Access to the Countryside Act, 1949

8.7.1 This act makes provisions for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves. Part III of the act specifically outlines provisions for the designation of nature reserves.

8.8 Natural Environment & Rural Communities Act, 2006

8.8.1 The Natural Environment and Rural Communities Act (NERC), 2006 is primarily intended to implement key aspects of the governments rural strategy published in July 2004. It also addresses a wider range of issues relating broadly to the natural environment.

Section 40

8.8.2 Section 40 of the NERC Act, 2006, places a duty on any public authority and statutory undertaker to have due regard for the conservation and enhancement of biodiversity when delivering their functions, extending the provisions outlined under section 74 of the CRoW Act, 2000.

8.8.3 The policy goes on to state that conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population of that habitat.

Section 41

8.8.4 Section 41 of the NERC Act, 2006 requires the secretary of state in consultation with Natural England to outline Species of Principle Importance (SPI) and Habitats of Principle Importance (HPI) that in their opinion are important for the conservation of biodiversity.

8.8.5 The secretary of state is required to:

- Take such steps as appear to the secretary of state to be reasonably practicable to further the conservation of the living organisms and types of habitat included in any list published under this section; or
- Promote the taking by other of such steps.

8.8.6 The NERC Act, 2006 also provides some amendments to the Wildlife & Countryside Act, 1981 (as amended) and includes provisions for enforcement powers and the protection of SSSI.

8.9 Protection of Badgers Act, 1992

8.9.1 The Protection of Badgers Act, 1992 makes it a criminal offence to wilfully kill, injure or take any badger, or attempt to do so. It also makes it an offence to intentionally or recklessly damage, destroy or obstruct access to any part of a badger sett.

8.10 Wild Mammals (Protection) Act, 1996.

8.10.1 The Wild Mammals (Protection) Act, 1996 makes provision for the protection of wild mammals from certain cruel acts, and for connected purposes. It would be an offence for any person that mutilates, kicks, beats, nails or otherwise impales, stabs, burns, stones, crushes, drowns, drags or asphyxiates any wild animal with intent to inflict unnecessary suffering.

8.11 The Environment Act, 2021

8.11.1 The Environment Act, 2021 gained royal ascent on the 9th November, 2021. The act is wide ranging and broadly has the following aim:

'a bill to make provision about targets, plans and policies for improving the natural environment, for statements and reports about environmental protection; for the office of environmental protection; about waste and resource efficiency; about air quality; for the recall of products that fail to meet environmental standards, about water, about nature and biodiversity; for conservation covenants; about the regulation of chemicals, and for connected purposes'.

8.11.2 Part 6 – Sections 98 - 101 of the act outlines provisions for biodiversity gain in planning.

8.11.3 Schedule 14 makes provision for biodiversity gain to be a condition of planning permission in England.

8.11.4 Schedule 14 states that, the biodiversity gain objective is met in relation to development for which planning permission is granted if the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the on-site habitat by at least the relevant percentage.

8.11.5 It goes on to state that the biodiversity value attributable to the development is the total of:

- The post development biodiversity value of the on-site habitat;
- The biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development; and
- The biodiversity value of any biodiversity credits purchased for the development.

8.11.6 The relevant percentage is set at 10% for biodiversity gain.

8.11.7 Part 6 – Section 100 of the act outlines provisions by regulation for the secretary of a register of biodiversity gain sites (known as the biodiversity gain site register).

8.11.8 A biodiversity gain site is land where:

- A person is required under the conservation covenant or planning obligation to carry out works for the purpose of habitat enhancement;
- That or another person is required to maintain the enhancement for at least 30 years after the completion of the works; and
- For the purpose of schedule 7A to the Town and Country Planning Act, 1990 the enhancement is made available to be allocated (conditionally or unconditionally, and whether for consideration or otherwise) in accordance with the terms of the covenant or obligation to one or more developments for which planning permission is granted.

8.11.9 Part 6 – Section 101 states that the secretary of state may make arrangements under which a person who is entitled to carry out the development of any land may purchase a credit from the secretary of state for the purpose of meeting the

biodiversity gain objective referred to in schedule 7A to the Town and Country Planning Act, 1990 and Schedule 2A of the Planning Act, 2008.

8.11.10 A credit is to be regarded for the purpose of that schedule as having such biodiversity value as is determined under the arrangements.

8.11.11 The arrangements may in particular include arrangements relating to:

- Applications to purchase credits;
- The amount payable in respect of a credit of a given value;
- Proof of purchase; and
- Reimbursement for credits purchased for development which is not carried out.

8.12 National Planning Policy Framework (2024)

8.12.1 The National Planning Policy Framework (NPPF, Ministry of Housing Communities and Local Government, 2024) sets out the Governments planning policies for England and how these should be applied. It provides a framework which locally prepared plans for housing and other developments can be produced.

8.12.2 The NPPF supplements Government Circular: Biodiversity and Geological Conservation 06/2005 (Office of the Deputy Prime Minister, 2005).

Conserving and Enhancing the Natural Environment

8.12.3 Paragraph 187 states: Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened

species such as swifts, bats and hedgehogs;

8.12.4 e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

8.12.5 f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

8.12.6 Paragraph 188 states: Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

8.12.7 Paragraph 189 states that: Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

8.12.8 Paragraph 190 states that: When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

8.12.9 Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

Habitats and Biodiversity

8.12.10 Paragraph 192 states that: To protect and enhance biodiversity and geodiversity, plans should:

- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

8.12.11 When determining planning applications, local planning authorities should apply the following principles:

- a) If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around

developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

8.12.12 The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar sites; and
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

8.12.13 The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Ground Conditions and Pollution

8.12.14 Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

8.13 Biodiversity and Geological Conservation Circular 06/2005

8.13.1 Biodiversity and geological conservation circular 06/2005 provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It complements the national planning policy in the NPPF, 2023 and the Planning Practice Guidance. Broadly the guidance covers designated

sites, the conservation of habitats and species, including outside of designated sites, protected species by law and the duties and powers used by planning authorities.

8.13.2 Paragraph 82 of the guidance states that 'in determining the application for development that is covered by up-to-date standing advice, a planning authority must take into account this standing advice'.

Protected Species and Planning

8.13.3 Paragraph 98 of the guidance states 'the presence of a protected species is a material planning consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat'.

8.13.4 Paragraph 98 also states that 'they (the planning authority) should consider attaching appropriate planning conditions or entering into planning obligations under which the developer would take steps to secure the long-term protection of the species'.

8.13.5 Paragraph 99 of the guidance goes on to state: 'it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision'. Paragraph 99 also states that 'this is justified only, where there is a reasonable likelihood of the species being present and affected by the development.'

8.14 Horsham District Council Adopted Local Plan (2015)

8.14.1 This section includes the deliberate inclusion of revisions made to Policy 31 outlined below under the draft HDC Local Plan (2020). This has been undertaken in view of recent legislative changes in the UK and additional local requirements that are reasonably likely to be considered at determination for this planning application.

Policy 25

8.14.2 Policy 25 sets out Horsham District Councils (HDCs) commitment to protecting the Natural Environment and Landscape Character. Policy 25 states:

8.14.3 The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development. The Council will support development proposals which:

8.14.4 Protects, conserves and enhances the landscape and townscape character, taking into account areas identified as being of landscape importance, the individual settlement characteristics, and maintains settlement separation.

8.14.5 Maintain and enhances the Green Infrastructure Network and addresses any identified deficiencies in the District.

8.14.6 Maintains and enhances the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, and ensures no net loss of wider biodiversity and provides net gains in biodiversity where possible.

8.14.7 Conserve and where possible enhance the setting of the South Downs National Park.

Policy 31

8.14.8 Development will be supported where it can demonstrate that it maintains and enhances the existing network of green infrastructure, the Nature Recovery Network, natural capital and biodiversity. Proposals that would result in the loss of existing green infrastructure or part of the Nature Recovery Network will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss and ensures that the ecosystem services of the area are retained.

8.14.9 Proposals will be expected to retain and enhance existing freshwater features, hedgerows, trees and deciduous woodland and the provision of additional hedgerow and tree planting will be sought subject to appropriate consideration of local and wider context, habitats and species.

8.14.10 Where the felling of a tree is necessary, for example due to disease, replacement planting with a suitable species and location to retain the link with the wider network of habitats and Green Infrastructure, will be required.

8.14.11 Development proposals will be expected to remove invasive species and will be required to contribute to the enhancement of existing biodiversity and deliver, as a minimum, a 10% net gain through the delivery of appropriate on-site biodiversity net gain or, where this is not practicable, to off-set the delivery to the Nature Recovery Network.

8.14.12 Proposals should create and manage appropriate new habitats, taking into account pollination, where practicable. The Council will support new development which retains and /or enhances significant features of nature conservation on development sites. The Council will also support development which makes a positive contribution to biodiversity, and where appropriate the Nature Recovery Network, through the creation of green spaces, and linkages between habitats to create local and regional ecological networks and allow the movement of wildlife through development sites.

8.14.13 Particular consideration will be given to the hierarchy of sites and habitats in the District as follows:

- Special Protection Area (SPA) and Special Areas of Conservation (SAC);
- Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNRs);
- Local Wildlife Sites (LWS), Local Nature Reserves (LNRs) and any areas of Ancient Woodland, traditional orchards, local geodiversity or other irreplaceable habitats not already identified in a & b above.

8.14.14 Where development is anticipated to have a direct or indirect adverse impact on sites or features of importance to nature conservation, development will be refused unless it can be demonstrated that:

- The objectives of a site's designation, where applicable, and integrity of the area will not be undermined;
- The reason for the development clearly outweighs the need to protect the value of the site; and,
- That appropriate mitigation and compensation measures are provided.

8.14.15 Any development with the potential to impact Arun Valley SPA or The Mens SAC will be subject to a Habitats Regulation Assessment to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the HRA of this plan.

8.15 Birds of Conservation Concern

8.15.1 Birds of Conservation Concern is a report compiled by a coalition of the UK's leading bird conservation and monitoring organisations and reviews the conservation status of all regularly occurring birds in the UK, Channel Islands and Isle of Man. The report was first released in 1996 and is currently in its 5th edition, released in 2021.

8.15.2 The bird species that breed and overwinter in the UK are assessed against a set of objective criteria and placed on the Green, Amber or Red lists that indicate the levels of conservation concern. The quantitative criteria collected is assessed against the historical decline, recent trends in population and range, population size, localisation, and the level of international importance of each species, as well as its global and European threat status.

8.16 IUCN Red List

8.16.1 The international Union for Conservation of Nature (IUCN) Red List of Threatened Species (also known as the IUCN Red List or Red Data Book) is an inventory of the global conservation status of biological species. The inventory is based upon internationally accepted criteria that evaluates the extinction risk of species in all regions of the world. There are two types of red list, the global and national lists. In the UK the IUCN Red List is overseen by an interagency working group that is coordinated by the Joint Nature Conservation Commission.

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