



Essential Ecology

**Land adjoining No. 2 and No. 3 Townhouse Cottages,
Townhouse Farm, Coolham Road, Thakeham, RH20
3EW**

Ecological Appraisal

(Ref: ESEC/25005/01/v1.0)

Prepared by Essential Ecology
on behalf of Fowlers Land and New Homes

November 2025

Quality Control

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The recommendations and conclusions are valid for the current proposals only. Should the proposals plans be amended, the report will need to be updated and where appropriate informed by additional/update survey work.

Report Ref.	Issue Date	Revision	Surveyor(s)	Author	Comments
ESEC/25005/01	10/11/2025	V1.0	TS/MJ	TS/MJ	

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Contact Us

a: 25 Katmandu Road, Bromsgrove, Worcestershire, B60 2SP

t: 07841 042796 | **e:** info@essentialecology.co.uk | **w:** www.essentialecology.co.uk

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1. Executive Summary

Table 1.1. Executive Summary

Section	Summary
Introduction and Methodology	<p>An Ecological Appraisal of the proposed development for two new dwellings at 'Land adjoining No. 2 and No. 3 Townhouse Cottages, Townhouse Farm, Coolham Road, Thakeham, RH20 3EW' has been undertaken by Essential Ecology (ESEC) on behalf of Fowlers Land and New Homes.</p> <p>The assessment was undertaken between June and August 2025 and is based on a desktop study, extended UK Habitat survey and protected species habitat suitability assessments, particularly in respect of [REDACTED] bats, nesting birds and Great Crested Newts. Specific survey work was also undertaken in respect of roosting bats and building B1. An assessment of impacts has been provided based on the proposals for the site.</p>
Ecological Designations and Notable Habitats	<p>Given the nature of the proposals for two residential dwellings and the distance between the development and the nearest identified statutory designations, non-statutory designations, ancient woodland and ancient/veteran trees and Priority Habitats, no significant adverse impacts on these sites/features are anticipated.</p>
Habitats and Flora	<p>The offsite native hedgerow (H1) has been assessed as being an Important Ecological Feature (IEF). The hedgerow is outside of the red line boundary and will therefore remain unimpacted under the proposals. The individual trees within the site are of some inherent ecological value in their own right, albeit unlikely to form important ecological feature at this time. It is understood that onsite trees will be removed to accommodate the proposals.</p>
Protected Fauna	<p>The site provides limited opportunities for protected fauna, largely limited to habitat for [REDACTED] bats, small mammals/common herpetofauna (including Priority Species) and nesting birds.</p>
Mitigation, Compensation and Enhancement	<p>A number of mitigation measures (EM1-EM7) are recommended in respect of Offsite Priority Habitat, offsite hedgerows, [REDACTED] bats, small mammals/common amphibians and nesting birds. A number of enhancement measures (EE1-EE5) are also recommended, including provision of new native planting/planting of known value to pollinators, inclusion of Hedgehog cut-outs in fences and provision of bat, bird and bee boxes within the fabric of the proposed buildings.</p>

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Conclusions	The proposed development, subject to the implementation of recommendations set out, is not considered likely to result in significant adverse impacts to other biodiversity at the site or in the local vicinity.
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2. Introduction

2.1 Terms of Reference

2.1.1 Essential Ecology (ESEC) has been commissioned by Fowlers Land and New Homes to undertake an Ecological Appraisal to inform a planning application for the site, located at 'Land adjoining No. 2 and No. 3 Townhouse Cottages, Townhouse Farm, Coolham Road, Thakeham, RH20 3EW' (central ordnance survey (OS) grid reference TQ 1033 1760).

2.2 Site Location and Overview

2.2.1 The site is located adjacent to the west of Coolham Road (B2139), in the north of Thakeham, West Sussex. Within a wider context, the site is surrounded primarily by agricultural land and low-density residential and commercial development, along with a number of wooded belts.

2.2.2 The site itself, as shown by the red line boundary, comprises an area of c. 0.14ha. The site comprises buildings, other developed land, vegetated garden and individual trees. An other native hedgerow and a non-native and ornamental hedgerow are present immediately adjacent to the site.

2.3 Description of Proposals

2.3.1 The proposals include Demolition of Existing Storage Unit and erection of 2no. detached dwellings, associated private gardens, parking and landscaping (see Appendix 1).

2.4 Purpose of Report

2.4.1 The purpose of this Ecological Appraisal is to inform the planning application for the site. Specifically, the Ecological Appraisal provides an assessment of the ecological value of the site and the anticipated impacts of the proposals, in the context of the relevant legislation and planning policy (a summary of relevant legislation and planning policy is provided at Appendix 2). The assessment is based primarily on the desktop study and site survey work undertaken and will include recommendations for appropriate mitigation where significant adverse impacts on Important Ecological Features (IEFs) are identified and/or proposals have the potential to result in the contravention of relevant legislation.

2.5 Quality Assurance and Management

2.5.1 The site survey work and Ecological Appraisal have been undertaken by Tom Staton. Tom has over 15 years' experience in professional ecological consultancy and holds a Master's degree in Biological Recording and Ecological Monitoring and a PhD in Ecology and Agri-environmental Research. Tom has experience in undertaking numerous habitat/botanical surveys, including extended Phase 1, UK Hab, NVC and ancient woodland indicator surveys across a range of sites

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and development projects in the UK. Tom holds a Natural England Class 2 bat licence, Natural England Class 1 Great Crested Newt licence and a Natural England Class 1 Dormouse licence.

2.5.2 The update Preliminary Roost Assessment (PRA), emergence survey work and review of the Ecological Appraisal have been undertaken by Megan Jewson (Director). Megan has over 12 years' experience in professional ecological consultancy, is a full member of CIEEM and holds a Master degree in Biodiversity and Conservation. Megan has experience in undertaking numerous ecological surveys and assessments and devising appropriate ecological mitigation and enhancements strategies for habitats and species across a range of sites and development projects in the UK. Megan also holds protected species licences in respect of bats (Class 2) and Great Crested Newt (Class 1) and is an accredited agent on a Dormouse (Class 1) licence.

2.5.3 This report has been produced with reference to current best practice guidance produced by CIEEM, including '*Guidelines for Ecological Impact Assessment (EclA) in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*', version 1.2 (dated April 2022) and '*Guidelines for Preliminary Ecological Appraisal*', second edition (dated December 2017), as well as British Standard (BS) 42020:2013 which involves the evaluation of potential ecological constraints based on UK Habitat Classification survey data and background desk study.

3. Methodology

3.1 Desktop Study

3.1.1 The desktop study was undertaken in July 2025. Background information for the site was obtained from Sussex Biodiversity Record Centre, Defra's Multi-agency Geographic Information for the Countryside (MAGIC) map tool (DEFRA 2025) and the Woodland Trust's Ancient Tree Hunt map tool (Woodland Trust 2025). Information was specifically sought for the following:

- Statutory Conservation Designations – 5km, extended to 10km for European-level Designations
- Non-statutory Designations – 2km
- Protected Species – 2km
- Priority Habitats, Ancient Woodlands and Veteran/Ancient Trees – 1km
- Offsite Ponds – 250m

3.2 Habitat Survey

3.2.1 The site was surveyed on 28th June 2025 based on UK Habitat Classification Survey (v2) (UKHab Ltd 2023) methodology. This involves identifying and mapping habitat types and establishing the species composition of each habitat type. The nomenclature used for plant species is based on the Botanical Society for the British Isles (BSBI) Checklist (BSBI 2025).

3.2.2 The survey was extended in line with CIEEM guidelines (CIEEM 2018), to record details on suitability and/or presence of any notable or protected habitats or species. This survey is used to identify where further, more detailed surveys are likely to be required to inform the Ecological Appraisal.

3.3 Faunal Surveys

3.3.1 General faunal activity (observed visually or by call) during the course of the survey work was recorded. Specific attention was also paid to the potential presence of protected, rare or notable species, as set out below.

[REDACTED]

[REDACTED]

Roosting Bats

Preliminary Roost Assessment (PRA) of Buildings/Structures

3.3.3 The buildings/built features were surveyed on 28th June 2025 and 30th July by a Natural England licensed surveyor (Class 2 Licence: WML-CL18). The buildings at the site were subject to a Preliminary Roost Assessment (PRA) to externally and internally assess suitability to support roosting bats, where accessible.

3.3.4 The PRA comprised an external and internal survey to identify potential/actual bat access points, potential roosting places and to identify any evidence of bats themselves.

3.3.5 Any potential roosting features (PRFs), access points and the overall condition of the buildings were noted. Particular attention was paid to loft voids, window sills/panes, door frames and surrounds, exposed open piping, hanging tiles, weather boarding, eaves, soffit boxes, fascia's, vents, lead flashing, loose roof tiles and gaps within brick/stonework, where present. Where identified, field signs such as droppings, feeding remains and dead or living bats were also recorded.

3.3.6 The potential roost suitability of the building was assessed using the criteria detailed in Table 3.1 below, in accordance with the current bat survey guidelines (Collins 2023).

Table 3.1: Potential Bat Roost Suitability of Buildings

Suitability	Criteria
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e., a complete absence of crevices/suitable shelter at all ground/underground levels).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
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 roost 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).
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 and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
High	A structure with one or more potential roost sites that are obviously suitable for use by large numbers 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 site.

Ground-level Tree Assessment (GLTA)

3.3.7 The onsite/adjacent trees were surveyed on 28th June 2025 by a Natural England licensed surveyor (Class 2 Licence: WML-CL18). The trees were subject to a Ground-level Tree Assessment (GLTA) to provide a preliminary assessment of suitability of trees to support roosting bats.

3.3.8 The GLTA comprised a detailed inspection of the exterior of the trees from the ground level to identify features which could be used by roosting bats (i.e., Potential Roosting Features or PRFs). Particular attention was paid to features such as woodpecker holes, rot holes, pruning cuts, tear out wounds, cankers, butt rot, cracks, snaps, lifted bark, fissures and ivy, where present. Where identified, field signs such as droppings, feeding remains and dead or living bats were also recorded.

3.3.9 The potential roost suitability of the trees was assessed using the criteria detailed in Table 3.2 below, in accordance with the current bat survey guidelines (Collins 2023).

Table 3.2: Potential Bat Roost Suitability of Trees

Suitability	Criteria
None	No PRFs identified in the tree and/or tree PRFs highly unlikely to be present.
FAR	Further assessment required to establish if PRFs are present in the tree.
PRF	A tree with at least one PRF identified. Where PRF's are identified these are categorised as: <ul style="list-style-type: none"> PRF-I: PRF identified is only suitable for individual or very small number of bats either due to size or lack of suitable surrounding habitat; or PRF-M: PRF is suitable for multiple bats and may therefore be used by a maternity colony.

Building Emergence Surveys

3.3.10 Building B1 was subject to an emergence survey in line with current best practice guidelines (Collins 2023).

3.3.11 During surveys, infra-red cameras were positioned around the building(s)/built features to record emerging or re-entering bats, with positions selected to provide full coverage of building elevations where roosting features were identified. IR cameras were in position at least 15 minutes prior to sunset, remaining in place for approximately 1.5 hours after sunset. This survey method aims to identify any roosting bats emerging from or returning to potential roost sites.

3.3.12 This survey work was carried out during suitable weather conditions, as set out in Table 3.3 below.

Table 3.3: Building/Built Features Emergence Survey Details

Survey Date	Survey Timings	Surveyor Positions	Surveyor Equipment	Weather Conditions ¹
30 th July 2025	Survey: 20:36 – 22:36 Sunset: 20:51	B1: 2 Positions (see Figure 3.1 below)	Anabat Scouts, Canon XA60s, IR Illuminator Lamps.	18-21°C, 30-70% cloud, BF2, dry

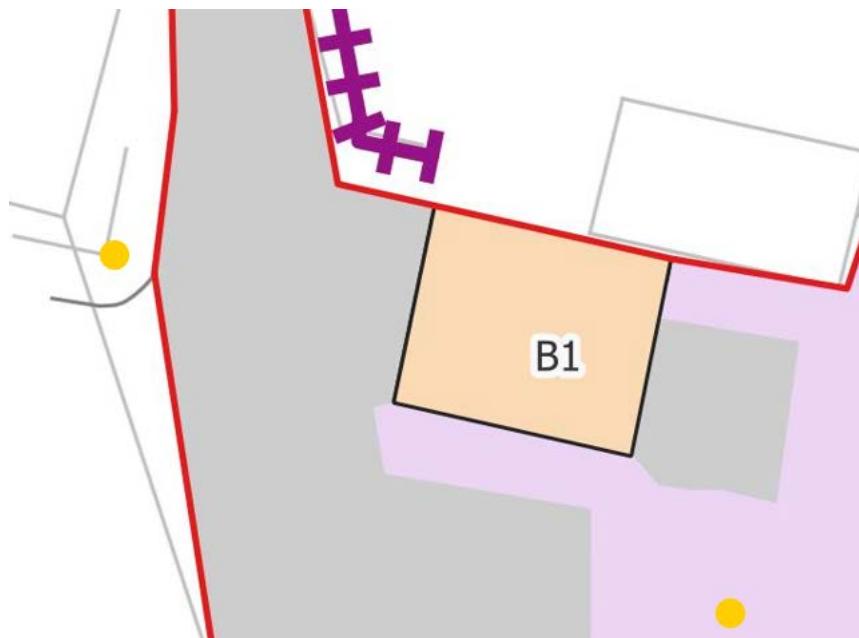


Figure 3.1. Bat emergence surveyor positions as shown by the yellow dots.

Nesting Birds

3.3.13 An assessment was made as to the suitability of the site to support nesting birds on the 28th June 2025. Survey methodology was broadly in line with standard techniques set out within '*Bird Monitoring Methods: A Manual of Techniques for Key UK Species*' (Gilbert, Gibbons and Evans 1998). During the survey, particular attention was paid to the following:

- presence of habitats suitable to support nesting birds.
- site context.
- evidence of current or previous nesting activity (e.g., nests and concentrations of droppings, feathers, down and chick remains etc.).
- general bird activity (observed visually or by call) both within the site and the immediate surrounds.

Great Crested Newt

3.3.14 Great Crested Newts utilise ponds for breeding and will typically commute up to 250m from breeding ponds (English Nature 2004). Consideration was therefore given to the presence of

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Great Crested Newts within connected offsite ponds within 250m by reviewing OS maps AND aerial satellite imagery.

3.4 Survey Limitations

- 3.4.1 The UK Habitat Classification Survey was undertaken in June, within the optimum survey season. As such, the data collected is considered to represent a valid sample of ecological evidence present for that date/season and provides a robust assessment of the habitats.
- 3.4.2 The absence of desk study records is not relied upon to determine absence of a particular species. Absence of records is often a result of under-recording within the given search area and as such the professional judgement of the surveyor is used to assess likely presence of absence, and inform the need for more detailed survey work.
- 3.4.3 Attention was paid to the presence of any invasive species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). The detectability of such species varies due to a number of factors, e.g., time of year, site management, etc., and hence the absence of any given invasive species should not be assumed even where not recorded during the habitat survey.
- 3.4.4 The northern elevation of building B1 could not be viewed during the survey work undertaken due to location immediately adjacent to an offsite hedgerow, which was partially growing over the roof at the site of survey. Given the dense vegetation present, which included Bramble, it is highly unlikely that roosting bats would be able to access the building on the northern elevation, whilst given the presence of Bramble, use of the vegetation for roosting is similarly considered unlikely.

3.5 Ecological Assessment Methodology

- 3.5.1 The assessment of ecological features and their relative importance is based on industry guidance and professional judgement. Where an Important Ecological Feature (IEF) is identified, importance will be defined at an appropriate geographic scale. The Ecological Appraisal follows the methodologies within the Chartered Institute of Ecology and Environmental Management (CIEEM) '*Guidelines for Ecological Impact Assessment (EclA) in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*' (CIEEM 2018).

4. Ecological Designations and Notable Habitats

4.1 European Statutory Ecological Designations

4.1.1 The nearest European-level statutory designation to the site is Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site, located c. 2.3km west of the site.

4.1.2 The site falls within the Sussex North Water Zone (SNWSZ), such that, in accordance with Natural England's 'Water Neutrality Position Statement' the proposals could result in water neutrality impacts on Arun Valley SAC/SPA. However, this document has now been withdrawn. Natural England's Withdrawal Statement, dated 31st October 2025, states that Southern Water's 'Hardham Basin Environmental Study' *"includes a package of ecological resilience measures and proposed licence amendments that will address the risk of further decline of Arun Valley sites as a result of the existing abstraction"*. It goes on to state that *"In Natural England's view this provides certainty that development in the SNWSZ will not have a likely significant effect on the Arun Valley sites in line with the Habitat Regulations."* Horsham District Council has confirmed that planning submissions no longer need to include a water neutrality statement, developments do not need to provide financial contributions to Southern Water and no bespoke conditions/s106 obligations are required to demonstrate water neutrality (Horsham District Council 2025). All applications for new housing will be required by condition to comply with the Building Regulations Part G Optional Technical Standard as required by Policy 37 of the Horsham District Planning Framework (Horsham District Council 2025). On this basis, no further consideration of Arun Valley SAC/SPA/Ramsar is required.

4.1.3 No significant adverse impacts on any other statutory ecological designations are anticipated as a result of the proposals. This is supported by a review of the Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) which indicates that, other than water neutrality impacts associated within Arun Valley SAC/SPA, the proposed development is unlikely to have a harmful effect on terrestrial SSSIs and the Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin.

4.2 Non-European Statutory Ecological Designations

4.2.1 The nearest identified non-European statutory ecological designations are Hurston Warren Site of Special Scientific Interest (SSSI) and Sullington Warren SSSI, located c. 2.5km west and c. 2.8k south of the site, respectively.

4.2.2 At these distances, given the scale and nature of the proposals, no significant adverse impacts on these designations or any other more distant statutory ecological designations are anticipated.

4.2.3 This is supported by a review of the Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) which indicates that at the site's location, the proposed development is unlikely to have a

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harmful effect on any other terrestrial SSSIs and the Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin.

4.3 Non-statutory Ecological Designations

- 4.3.1 The nearest identified non-statutory ecological designation is West Wantley Farm Meadow Local Wildlife Site (LWS), located c. 1.8km south west of the site. This LWS comprises a small unimproved pasture, with hedgerows and ponds. No other LWS' were identified within 2km of the site.
- 4.3.2 At this distance, given the scale and nature of the proposals, no significant adverse impacts on this or any other more distant non-statutory ecological designations are anticipated.

4.4 Ancient Woodland and Ancient/Veteran Trees

- 4.4.1 The nearest area of identified ancient woodland is located c. 0.25km north of the site. A number of other areas of ancient woodland are located further north of the site.
- 4.4.2 A single veteran tree has been identified within 1km of the site, comprising a Pedunculate Oak located c. 0.4km north east of the site.
- 4.4.3 At these distances, given the scale and nature of the proposals, no significant adverse impacts on these ancient woodlands/veteran trees or any other more distant areas of ancient woodland/veteran trees are anticipated.

4.5 Priority Habitats

- 4.5.1 Areas of Priority Habitat have been identified by the desktop study within 1km of the site, the nearest comprising an area of potential Open Mosaic Habitat located approximately 30m north of the site. This area comprises a historic landfill, now occupied by the privately-owned Thakeham Manor and therefore located within a secure estate. Reference to aerial imagery indicates the area is unlikely to qualify as Open Mosaic Habitat at this time. As such, the proposals are considered highly unlikely to impact on Priority Open Mosaic Habitat.
- 4.5.2 A number of areas of Deciduous Woodland have also been identified in the local area, the nearest located c. 70m south west of the site, along a public footpath. At this distance, given the small-scale nature of the proposals, no significant adverse impacts on this or any other more distant Priority Habitat is anticipated. Nevertheless, as a precaution, recommendations are set out at Section 7 below in order to safeguard against indirect impacts resulting from construction activities (e.g., dust deposition).

5. Habitats & Flora

5.1 Introduction

5.1.1 A description and evaluation of the habitats and ecological features present within/adjacent to the site is set out below, together with an assessment of the likely impacts of the proposals. An assessment of the habitat in terms of value for protected/notable species is set out separately within Section 6 below.

5.2 Vegetated garden (u1-828)

5.2.1 The site is dominated by vegetated garden (see drawing ESEC/25005/01-01), largely in the form of lawn, amenity planting and horticulture plots and small areas of tall forbs and ruderal/ephemeral vegetation.

5.2.2 The lawn was assessed to be characteristic of modified grassland. The grassland appeared to be subject to regular management in the form of mowing, with a uniform sward height of <5cm at the time of survey. The sward was dominated by Common Bent, Yorkshire-fog and White Clover, with frequent Perennial Rye-grass and Annual Meadow-grass. Other than White Clover, forb cover was noted to be low, largely including typical amenity grassland species such as Daisy, Dandelion, Creeping Buttercup, Greater Plantain, Common Cat's-ear, Selfheal and Germander Speedwell. Ground-elder was also recorded within the west, whilst a moderate cover of mosses was also recorded, primarily comprising *Rhytidadelphus squarrosus*.

5.2.3 A portion of vegetated garden in the north east was used as horticulture plots, supporting small beds cultivated for various crops such as Peas, Strawberry, Raspberry and Gooseberry. The plots were noted to be well maintained at the time of survey and largely devoid of encroaching weed species. Strips of lawn, as described above, were present between the plots.

5.2.4 Small areas of ruderal/ephemeral vegetation were recorded within the site, particularly within the north west of the site which was up until recently, used as a chicken run. Areas of ruderal/ephemeral supported a largely uniform, moderately short sward height with occasional patches of bare ground. Species recorded within these areas include included Yorkshire-fog, Pineappleweed, Scentless Mayweed, Parsley-piert, Greater Plantain, Scarlet Pimpernel, White Clover, Common Field-speedwell, Selfheal, Common Nettle, Creeping Thistle, White Clover, Selfheal, Ground-elder and Common Fleabane. Areas of brash and log piles were recorded within this area. In addition, a small strip of Common Nettle was noted within the west of the vegetated garden.

5.2.5 Ornamental shrubs were also recorded, primarily around the margins, including Buddleia, Olive, Rose, Hazel, Guelder-rose, Snowberry, Laurel, Garden Privet, Lawson Cypress, Elder and Bramble, along with small Apple trees with a height of less than 5m. Some areas of ornamental shrubs at the curtilage were recorded as being managed as hedgerow habitat but were not of a sufficient length to be categorised as hedgerow in accordance with the UK Hab description.

5.2.6 Areas of vegetated garden within the site are considered to be of limited botanical and ecological value, do not form an important ecological feature and do not form a constraint to the proposals. In any event, areas of vegetated garden will continue to be provided under the proposals (albeit reduced in extent).

5.3 Other developed land (u1b6)

5.3.1 Areas of other developed land comprise an existing single-lane asphalt access road with an associated parking area, in addition to a small storage area constructed with paving slabs (see drawing ESEC/25005/01-01).

5.3.2 These areas of other developed land were largely noted to be in good condition with negligible vegetation at the time of survey, although the area of paving slabs to the east of Building B1 supported sparse colonising vegetation including Common Nettle, Cleavers, Bristly Oxtongue and Bramble.

5.3.3 Areas of other developed land are considered to be of negligible ecological value, do not form important ecological features and are not considered to pose a constraint to the proposals.

5.4 Buildings (u1b5)

5.4.1 Four small outbuildings (B1-B4) were recorded within the site (see drawing ESEC/25005/01-01).

5.4.2 The buildings were recorded to support negligible vegetation cover and are therefore considered to be of negligible botanical and ecological value and do not form important ecological features.

5.5 Individual trees (200)

5.5.1 Individual trees were recorded within the vegetated garden (see drawing ESEC/25005/01-01).

5.5.2 The trees include two multi-stemmed, mature Ash trees.

5.5.3 The trees within the site are of some inherent ecological value in their own right, albeit unlikely to form important ecological features at this time. It is anticipated that the trees will be lost as part of the proposals. As such, recommendations are set out at Section 7 below in respect of replacement tree planting.

5.6 Other native hedgerows (h2a6)

5.6.1 A single other native hedgerow (H1) was recorded offsite adjacent to the eastern site boundary (see drawing ESEC/25005/01-01).

5.6.2 A description of the offsite hedgerow is set out at Table 5.1, below.

Table 5.1: Hedgerow Descriptions

No.	Height	Width	Woody species	Avg. per 30m* ¹	Ground flora & climbers	Associated features	Likely to Qualify* ²
H1	2.5m (trees up to 10m)	1-2m	Ivy, <u>Hawthorn</u> , <u>Hazel</u> , <u>Bamboo</u> .	2	Dominated by Ivy. Honeysuckle climbing within hedgerow	Presence of bank; standard trees	N
Comments: Offsite. Unmanaged, dominated by dense Ivy along fence line with scattered shrubs, associated with a bank and trees.							

*¹ estimated average number of woody species per 30m (as listed under Schedule 3 of the Hedgerows Regulations 1997). Qualifying species underlined.

*² likely to qualify – as ‘important’ under the wildlife and landscape criteria of the Hedgerows Regulations 1997

5.6.3 Hedgerow H1 forms the curtilage of a dwelling and therefore cannot qualify as important under the Hedgerow Regulations 1997 (as amended), while in any event species richness falls well below the threshold for ‘important’ hedgerows. However, the hedgerow is likely to qualify as a Priority Habitat, being dominated by native species.

5.6.4 On this basis, hedgerow H1 is considered to be of elevated value in the context of the local area and is considered to form an important ecological feature. In any event, given the hedgerow is located offsite, it will be fully retained under the proposals and recommendations are therefore set out at Section 7 below to ensure this feature is fully safeguarded throughout construction.

5.7 Non-native and ornamental hedgerows (h2b)

5.7.1 A single non-native and ornamental hedgerow (H2) was recorded offsite adjacent to the site boundary (see drawing ESEC/25005/01-01).

5.7.2 Hedgerow H2 was recorded to be well managed, with a height of approximately 3m and width of around 2m, at the time of survey. Hedgerow H2 was both dominated by Cypress with a field layer dominated by Ivy, bare ground and occasional Common Nettle.

5.7.3 The ornamental hedgerow forms the curtilage of residential dwellings and therefore does not qualify as important under the Hedgerow Regulations 1997 (as amended). The hedgerow is dominated by non-native species and therefore does not form Priority Habitat.

5.7.4 The non-native and ornamental hedgerow is of limited botanical and ecological value, does not form an important ecological feature and does not form a constraint to the proposals.

6. Protected Fauna

6.1 Introduction

6.1.1 A description and evaluation of the site's suitability for protected species and presence/likely absence of protected species is set out below, together with an assessment of the likely impacts of the proposals. The legislative protection afforded to each species/species group is provided below, with a summary of the legislation included at Appendix 2.

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6.3 Bats

6.3.1 **Legislative Protection.** Regulation 41 of the Conservation of Habitats and Species Regulations 2017 (as amended), Wildlife and Countryside Act 1981 (as amended), Wild Mammals (Protection) Act 1996 and Natural Environment and Rural Communities Act 2006 (various species).

6.3.2 **Desktop Study Review.** A number of records of bats were returned from within the search area, including Common Pipistrelle, Soprano Pipistrelle, Nathusius' Pipistrelle, Noctule Bat, Serotine, Daubenton's Bat, Whiskered/Brandt's Bat, Alcathoe Bat and Brown Long-eared Bat. Of these, the nearest records are located at least c. 30m east of the site boundary, comprising a day roost of Common Pipistrelle (single bat) and a Brown Long-eared Bat feeding perch in a stable block. Additional roost records were returned from at least c. 50m east of the site boundary, relating to a barn supporting low numbers of droppings attributed to Pipistrelle and Brown Long-eared Bat. No recent records of high numbers of roosting bats were returned within the search area.

6.3.3 Anecdotal records were received from current tenants, reporting use of the site by bats and in particular previous roosting activity within building B1, accessed via a hole on the eastern elevation. Anecdotal records were also received by adjacent tenants stating that bat activity at the site had notably declined over the last few years.

6.3.4 **Roosting Bats - Survey Results, Assessment & Evaluation.** None of the trees within/adjacent to the site were recorded to support potential roost features suitable to support roosting bats, whilst no evidence for the presence of roosting bats within trees was recorded during the survey work undertaken.

6.3.5 The buildings within the site were assessed to be of negligible suitability for roosting bats being of a construction type not typically favoured by roosting individuals and with no features identified as having roost potential. A single dropping (with characteristics attributable to bat droppings) was recorded within Building B1. Based on the quantity and location of the dropping, which was not below any apparent roost feature, this was attributed to an in-flight bat, on the basis that the interior of the building is readily accessible to flying bats via large gaps around the door (see Appendix 3).

6.3.6 Nevertheless, given the anecdotal received from the tenants and the presence of a single likely bat droppings, further survey work in the form of an emergence survey was undertaken combined with an update PRA. No bats or evidence of bats was recorded internally during the survey. Particular attention was also given to the access hole described by the current tenants; however, this was recorded to be completely overgrown with vegetation. No bats were recorded emerging or re-entering the building during the emergence survey.

6.3.7 On this basis, no significant impacts on the local population of roosting bats are anticipated as a result of the proposals. Nevertheless, it is recommended that a precautionary approach is taken with regards to building B1 in line with safeguards set out in Section 7 below.

6.3.8 **Foraging and Commuting Bats - Survey Results, Assessment & Evaluation.** The site offers opportunities for foraging and commuting bats in the form of a vegetated garden and individual trees. These habitats are somewhat sub-optimal and limited in extent.

6.3.9 Furthermore, more substantial and suitable opportunities are likely provided for foraging and commuting bats offsite in the local area, particularly in association with the offsite hedgerow network and offsite wooded belts. In particular, hedgerow H1 offsite adjacent to the eastern site boundary forms part of a wider linear feature in conjunction with the well-established hedgerow with trees adjacent to the east of the B2139, and could therefore form a commuting corridor for bats, as well as foraging habitat.

6.3.10 Bat species were incidentally recorded as part of the emergence survey work of building B1. Overall, very low levels of activity were recorded, dominated by foraging and commuting Common and Soprano Pipistrelle, with very occasional commuting Noctules recorded overhead.

6.3.11 A similar composition of habitats will remain present at the site under the proposals (albeit with a reduced extent), whilst the most valuable feature, hedgerow H1 is offsite and therefore will be fully retained. The species recorded within the site are also common associated with urban/sub-urban habitats being generally tolerant of lighting. As such, under the proposals it is anticipated that a similar assemblage of bats would continue to utilise the site.

6.3.12 On this basis, no significant impacts on the local population of foraging and commuting bats are anticipated as a result of the proposals. Nevertheless, in order to ensure continued opportunities for bats in the future a number of recommendations in respect of external lighting are outlined at Section 7 below.

6.4 Other Mammals

6.4.1 **Legislative Protection.** Regulation 41 of the Conservation of Habitats and Species Regulations 2017 (as amended) (Dormouse), Wildlife and Countryside Act 1981 (as amended) (Dormouse, Otter and Water Vole), Wild Mammals (Protection) Act 1996 (all wild mammals as defined by the act) and Natural Environment and Rural Communities Act 2006 (various species, including Hedgehog, Brown Hare, Harvest Mouse and Polecat).

6.4.2 **Desktop Study Review.** No specific records of other mammal species were returned from within the site. Records of the protected species Dormouse and Water Vole were returned from the local area, located c. 0.7km and 1.4km from the site, respectively. A single record of Red Squirrel was also returned, c. 1.4km north west of the site. The Priority Species Hedgehog and Polecat have also been recorded within the locality.

6.4.3 Anecdotal records of use of the site by breeding Hedgehog were also provided by the current tenants.

6.4.4 **Survey Results, Assessment & Evaluation.** No evidence of any protected, rare or notable mammal species was recorded within the site.

6.4.5 The site does not support and is not linked to suitable habitats for Otter or Water Vole. The offsite native hedgerow along the eastern site boundary (H1) could potentially function as part of a connective corridor for Dormouse, although the hedgerow itself is of poor suitability for this species, with frequent gaps. The offsite shrubbery within the site is dominated by non-native species and provide limited habitat connectivity, such that their use by Dormouse is considered highly unlikely.

6.4.6 The site provides opportunities for the Priority Species Hedgehog, whilst anecdotal records for the presence of breeding Hedgehog were provided by the current tenants. Given the nature and scale of the proposals, similar albeit reduced opportunities will likely be afforded for Hedgehog in the long-term, whilst abundant opportunities are likely afforded by offsite habitats, including adjacent gardens, the agricultural hedgerow network and wooded belts.

6.4.7 Other common species which likely make use of the site, e.g., Fox, Mice, Deer and Brown Rat, do not receive specific legislative protection in a development context and are therefore not a material planning consideration.

6.4.8 Given the nature and scale of the proposals for provision of two dwellings, the proposals are likely to afford similar opportunities for mammals in the long-term. Offsite hedgerow H1 is to

be fully retained under the proposals, thus safeguarding potential Dormouse habitat in the site vicinity.

6.4.9 On this basis, no significant impacts on the local mammal populations (including Schedule 5 species) are anticipated as a result of the proposals. A number of recommendations are set out at Section 7 below to ensure Hedgehog and other small mammals are fully safeguarded throughout construction.

6.5 Birds

6.5.1 **Legislative Protection.** Wildlife and Countryside Act 1981 (as amended) (note additional protection afforded to Schedule 1 birds as listed within the act) and Natural Environment and Rural Communities Act 2006 (various species).

6.5.2 **Desktop Study Review.** Birds recorded in the local area largely comprise species associated with farmland and urban habitats, including Barn Owl, Song Thrush, Starling, House Sparrow, and Swift. The majority of records were at a poor resolution, with no records specifically relating to the site.

6.5.3 **Survey Results, Assessment & Evaluation.** The site provides nesting opportunities for a range of common species, particularly in the form of ornamental planting associated with the vegetated garden and bird boxes on a tree. Offsite hedgerow H1 also provide opportunities for nesting birds. Indeed, bird species recorded within the site during the survey work undertaken include Rock Pigeon, House Martin, Goldfinch, Stock Dove, Collared Dove, House Sparrow, Wood Pigeon, House Sparrow and Carrion Crow.

6.5.4 Species recorded within the site are generally common and widespread. House Sparrow, a Priority Species, was also recorded, albeit this species is commonly associated with suburban/urban habitats such that continued opportunities would be available under the proposals.

6.5.5 Overall, no significant impacts on the conservation status of the local bird population are anticipated as a result of the proposals. Nevertheless, the proposals will result in the removal and disturbance of habitats suitable to support nesting birds in the form of buildings, individual trees (and associated bird boxes) and ornamental planting within the vegetated garden, which could potentially affect any nesting birds that may be present at the time of works. Accordingly, a number of measures are set out at Section 7 below to ensure nesting birds are fully safeguarded throughout construction.

6.6 Great Crested Newts

6.6.1 **Legislative Protection.** Regulation 41 of the Conservation of Habitats and Species Regulations 2017 (as amended), Wildlife and Countryside Act 1981 (as amended) and Natural Environment and Rural Communities Act 2006.

6.6.2 **Desktop Study Review.** No records of Great Crested Newt have been returned from within the search area.

6.6.3 **Survey Results, Assessment & Evaluation.** No ponds are present within the site, whilst the site provides very minor terrestrial opportunities for Great Crested Newts, limited to areas of ornamental shrubs and tall forbs within the vegetated garden. The offsite hedgerows adjacent to the site may also afford opportunities for Great Crested Newts.

6.6.4 Two ponds were identified within 250m (the typical commuting distance for this species) of the site boundaries (see Figure 6.1 below) on OS/satellite imagery.

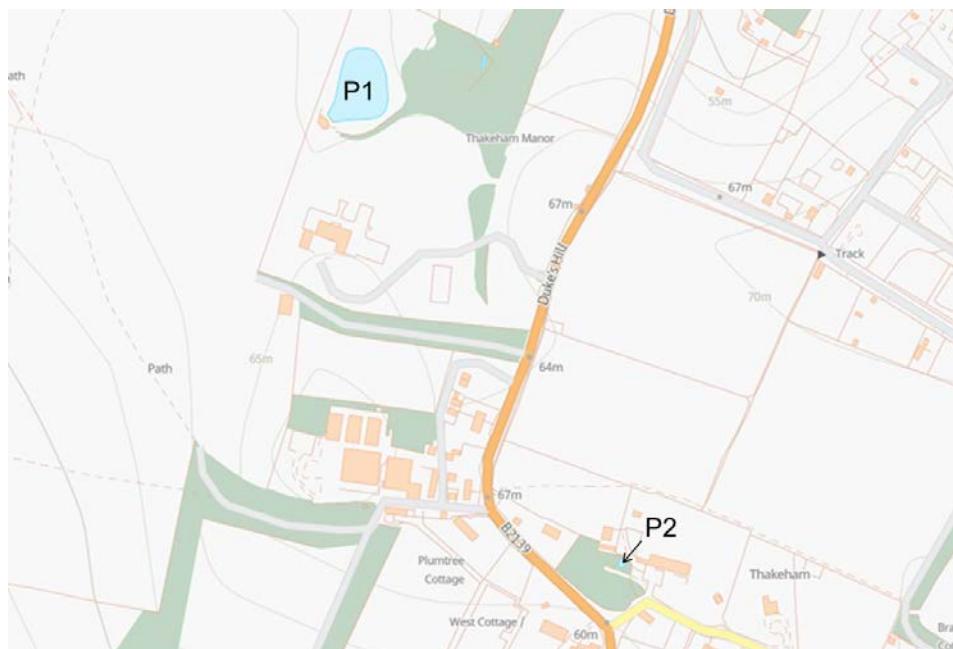


Figure 6.1: Ponds within 250m of the site.

6.6.5 Pond P1 is located c. 235m north of the site boundary, but c. 315m from the development area. As such, at this distance, any Great Crested Newts breeding in this pond are considered highly unlikely to utilise the small areas of suitable terrestrial habitat within the site.

6.6.6 Pond P2 is located c. 150m east of the site boundary. This location was visited during the survey work with permission of the landowner, and found to comprise a dry depression filled with tall forb vegetation, dominated by Common Nettle. As such, pond P2 is not considered suitable for breeding Great Crested Newts.

6.6.7 On this basis, no significant impacts on the local conservation status of Great Crested Newts are anticipated as a result of the proposals.

6.7 Other Amphibians

6.7.1 **Legislative Protection.** Regulation 41 of the Conservation of Habitats and Species Regulations 2017 (as amended) (Natterjack Toad), Wildlife and Countryside Act 1981 (as amended) (Natterjack Toad) and Natural Environment and Rural Communities Act 2006 (Natterjack Toad, Common Toad and Pool Frog).

6.7.2 **Desktop Study Review.** Four other amphibian species have been returned from within the search area, including the Priority Species Common Toad, which has been recorded c. 1.5km west of the site.

6.7.3 **Survey Results, Assessment & Evaluation.** The site provides minor opportunities for other amphibian species, limited to vegetated garden, whilst the bases of offsite hedgerows also afford opportunities for amphibians.

6.7.4 Given the nature and scale of the proposals for provision of two dwellings, the proposals are likely to afford similar opportunities for common amphibians in the long-term (albeit reduced in extent), while the site does not lie in close proximity to any known ponds. On this basis, no significant impacts on the local amphibian population are anticipated as a result of the proposals. Nevertheless, use of the site by common amphibians, including Priority Species, cannot be conclusively ruled out. A number of recommendations are therefore set out at Section 7 below to ensure common amphibian species are fully safeguarded throughout construction.

6.8 Reptiles

6.8.1 **Legislative Protection.** Regulation 41 of the Conservation of Habitats and Species Regulations 2017 (as amended) (Smooth Snake and Sand Lizard), Wildlife and Countryside Act 1981 (as amended) (Smooth Snake and Sand Lizard; and partial protection: Adder, Common Lizard, Grass Snake and Slow-worm) and Natural Environment and Rural Communities Act 2006.

6.8.2 **Desktop Study Review.** Two species of reptile have been recorded in the local area, including Slow-worm and Grass Snake. The nearest high resolution (100m or greater) record is located c. 1.2km north west of the site.

6.8.3 **Survey Results, Assessment & Evaluation.** The site provides very minor opportunities for reptiles, limited to areas of ornamental shrubs in the vegetated garden and offsite hedgerow bases. Brash and log piles were also noted within the vegetated garden, which could provide refuge opportunities for reptiles. However, given the limited availability of habitat, it is unlikely that reptiles would make regular use of the site, whilst the habitats within the site would not support a viable population of reptiles in isolation.

6.8.4 On this basis, no significant impacts on the local reptile population are anticipated as a result of the proposals. In any event, recommendations set out at Section 7 below in respect of small

mammals and common amphibians will also ensure reptile species are fully safeguarded throughout construction.

6.9 Invertebrates

6.9.1 Legislative Protection. Regulation 41 of the Conservation of Habitats and Species Regulations 2017 (as amended) (Large Blue, Fisher's Estuarine Moth and Lesser Whirlpool Ram's-horn Snail), Wildlife and Countryside Act 1981 (as amended) (White-clawed Crayfish) and Natural Environment and Rural Communities Act 2006 (various).

6.9.2 Desktop Study Review. A number of protected (Schedule 5) invertebrate species have been recorded in the local area, including Stag Beetle, Purple Emperor and Brown Hairstreak, although none were recorded within 0.5km of the site. In addition, a number of Priority Species of invertebrates have been returned from within the local area, primarily comprising butterfly and moth species such as Small Heath, Wall, Rustic and Buff Ermine.

6.9.3 Survey Results, Assessment & Evaluation. The site provides opportunities for common invertebrates associated with garden habitats. The habitats present are unlikely to support notable invertebrate species, with limited plant species diversity or important microhabitat features such as topographical diversity or deadwood resources. Furthermore, the proposals are likely to afford similar opportunities for invertebrates in the long-term. On this basis, no significant impacts to the local invertebrate population are anticipated.

7. Mitigation, Compensation and Enhancement Recommendations

7.1 Mitigation

7.1.1 In accordance with the information set out above, an overview of required mitigation measures is provided in Table 7.1 below.

Table 7.1: Ecological mitigation measures

Ref	Receptor	Recommendations
Pre-commencement		
EM1	Deciduous Woodland Priority Habitat	<ul style="list-style-type: none">• Damping down of dust sources and covering of loose materials to reduce dust deposition.• Storage of chemicals and hazardous materials in line with best practice guidelines.• Unsecured food and litter will not be left within the working area overnight.• Fires will only be lit in secure compounds and not allowed to remain during the night.• Any lighting required will be turned off when not in use/outside of working hours.
EM2	Offsite Hedgerows and Trees	<ul style="list-style-type: none">• Retained offsite hedgerows and trees adjacent to the site will be protected during construction according to arboricultural best practice (BS5837:2012) or as otherwise directed by a suitably competent arboriculturalist. This may require protective fencing or other methods to safeguard root protection areas.• Measures should be undertaken in accordance with the Arboricultural Impact Assessment (Lizard Landscape Design and Ecology 2025).
EM3		

Table 7.1: Ecological mitigation measures

Ref	Receptor	Recommendations
		<ul style="list-style-type: none"> • [REDACTED] • [REDACTED] • [REDACTED] • [REDACTED]
EM4	Roosting Bats – B1	<ul style="list-style-type: none"> • A Precautionary Working Method Statement will be produced setting out the measures required to safeguard roosting bats. Measures set out will be in line with the current bat mitigation guidelines (Reason and Wray 2023). • A toolbox talk will be given to site staff/contractors. This will include details of the legal protection of bats and relevant procedures should the species be discovered during construction works. • Works should take place during weather conditions suitable for bats to be active (i.e., dry/calm and temperatures no lower than 8°C for at least an hour or two from dusk on 3-4 consecutive nights prior). • A licensed (Natural England Class 2) ecologist will undertake a detailed inspection of features to be impacted under the proposals using an endoscope, torch and ladder, where required, immediately prior to removal. • In the highly unlikely event that roosting bats or evidence of roosting bats is recorded during the course of the works; work will cease immediately. Consideration would then need to be given to the need for further survey work and Natural England licensing prior to works recommencing. • The building will be taken apart by hand. A watching brief for bats will be maintained by contractors throughout demolition. Should any possible evidence of bats be encountered during demolition, works will cease and the licensed ecologist will be contacted immediately for further advice.
EM5	Small Mammals and Common Amphibians	<ul style="list-style-type: none"> • Where feasible, ground works/clearance will be undertaken between March/April and September/October outside of the hibernation period. • Vegetation is expected to continue to be maintained at its current height. However, should any areas of outgrown grassland (over 20cm) be present which need to be removed, these will initially be strimmed to a short height (c.15cm) and left for a minimum period of 24hrs so as to encourage and allow time for animals to disperse to nearby habitat. Vegetation will then be mown to ground level. • Any potential refuge features to be removed e.g., brash and log piles will be carefully disassembled by hand. • In the unlikely event protected species are encountered, works should cease immediately and a suitably qualified ecologist (e.g., Essential Ecology) urgently contacted for advice. • In the event other animals are encountered (e.g., Hedgehog, frog etc), these will be carefully moved to an area of retained suitable habitat (e.g.,

Table 7.1: Ecological mitigation measures

Ref	Receptor	Recommendations
		<p>garden of the adjacent dwelling under the same ownership) away from the working area.</p> <ul style="list-style-type: none"> In the event that an injured animal is encountered, it will be taken to a vet or animal hospital for treatment.
EM6	Nesting Birds	<ul style="list-style-type: none"> Where feasible, building demolition/above ground habitat clearance works (e.g., tree/shrub removal) works will be avoided between the 1st March to 31st August. If this is not practicable, features to be removed or within close proximity of proposed works will be checked by a suitably qualified ecologist (SQE) no more than 24hrs prior to commencement of works to identify the presence of any nests/nesting activity. Any active nests identified will be cordoned off within an appropriate buffer (minimum 5m) and protected until the end of the nesting season or until the nesting attempt is complete. A watching brief for nesting birds will be maintained by contractors throughout construction. Should any new nests be encountered during the construction period, works will cease and a suitably qualified ecologist will be contacted immediately for further advice.
Completed Development		
EM7	Foraging/ Commuting Bats	<ul style="list-style-type: none"> External lighting should be so far as possible minimised. Should any external lighting be proposed, consideration should be given to nocturnal fauna through provision of a sensitive lighting design. Recommendations for appropriate lighting are set out within the Institute of Lighting Professionals (ILP) Guidance Note GN08/23 '<i>Bats and Artificial Lighting at Night</i>' (ILP 2023).

7.2 Compensation and Enhancements

7.2.1 In accordance with the information set out above, an overview of recommended compensation and enhancement measures is provided in Table 7.2 below.

Table 7.2 Ecological enhancement measures

Ref	Enhancement Measure	Recommendations
EE1	Trees/Shrub/ Hedgerow Planting	<ul style="list-style-type: none"> It is recommended that new planting within the site comprises native species of local provenance. Tree planting could include native species such as Ash, Oak, Field Maple, Wild Cherry or Crab Apple. Shrub/hedgerow planting could include native species such as Hawthorn, Blackthorn, Field Maple, Dogwood, Hazel, Spindle, Honeysuckle, Wayfaring Tree, Dog-rose or Wild Privet.

Table 7.2 Ecological enhancement measures

Ref	Enhancement Measure	Recommendations
		<ul style="list-style-type: none"> Where non-native species are proposed, these should include species of value to wildlife, such as varieties listed on the RHS' 'Plants for Pollinators' database (The Royal Horticultural Society 2025), providing a nectar source for bees and other pollinating insects.
EE2	Bat Boxes	<ul style="list-style-type: none"> It is recommended that a minimum of bat boxes (e.g., Habitat or Ibstock tube) be provided within the fabric of the proposed buildings, positioned at the eaves on the southern or western elevation at a minimum height of 4-5m. The bat boxes should be positioned so as to ensure these features are not directly lit under the proposals.
EE3	Bird Boxes	<ul style="list-style-type: none"> It is recommended that a minimum of two bird boxes are incorporated into the fabric of the proposed buildings. Swift boxes (e.g., Habitat Swift box or Ibstock Swift Eco Habitat) are recommended as these boxes target a variety of urban species. Boxes should be positioned at the eaves on the northern or eastern elevations at intervals of 50-100cm at a minimum height of 5-6m.
EE4	Hedgehog Cut-outs	<ul style="list-style-type: none"> It is recommended that cut-outs are provided at the base of any proposed close-board fence panels at the curtilage of the new dwelling in order to allow Hedgehogs to disperse through the site. Hedgehog cut-outs should measure c. 13cm x 13cm.
EE5	Invertebrates	<ul style="list-style-type: none"> It is recommended that a minimum of two bee bricks are incorporated into the fabric of the proposed buildings. These should be positioned on the southern elevation at a minimum height of 1m and should not be obstructed by vegetation.

8. Conclusions

- 8.1.1 Essential Ecology has undertaken an Ecological Appraisal of the site based on the results of a desktop study, extended UK Habitat Survey and habitat suitability assessments for protected species, particularly including [REDACTED] bats, Great Crested Newts and nesting birds. Specific emergence survey work has also been undertaken in respect of roosting bats and building B1.
- 8.1.2 The implementation of recommended mitigation measures will ensure the ecological value of the site and protected species are safeguarded. A number of enhancement measures could also be implemented to provide an ecological betterment over the existing situation in line with local and national planning policy.
- 8.1.3 On this basis, the proposed development is not considered likely to result in significant adverse impacts to biodiversity at the site or in the local vicinity either alone or in combination with other projects.

9. References

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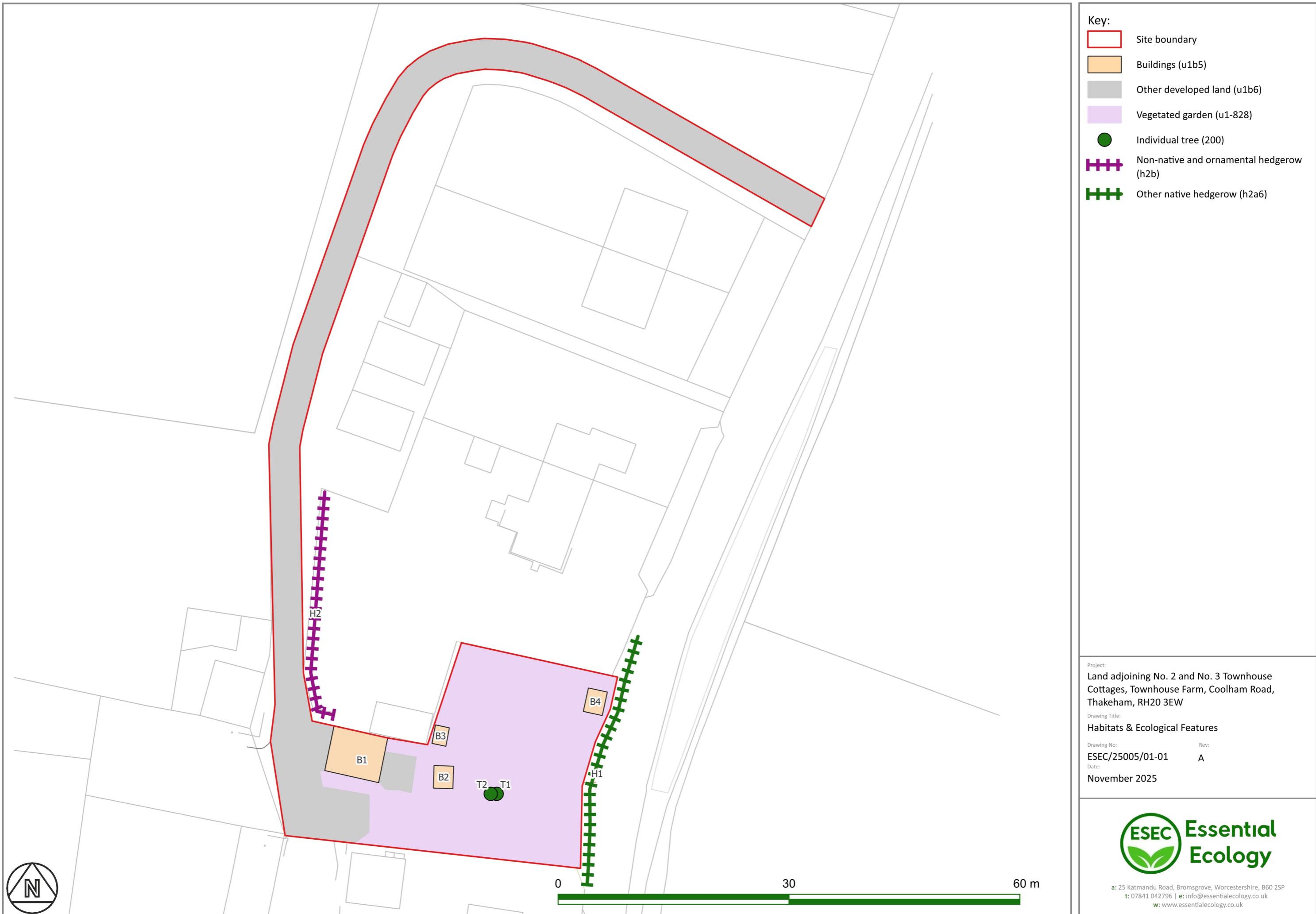
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Drawings



Appendices



Appendix 2 - Summary of Relevant Legislation and Planning Policy

Legislation – Statutory Designations
Ramsar Sites:
Ramsar Sites are wetlands of international importance designated under the Ramsar Convention on Wetlands for containing representative, rare or unique wetland types or for their importance in conserving biological diversity. Ramsar sites receive statutory protection under the Wildlife & Countryside Act 1981 (as amended). Policy statements relating to Ramsar Sites have been issued which extend to same level of protection at policy level as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).
Special Protection Areas (SPAs):
Special Protection Areas (SPAs) are protected areas for birds in the UK and in England are classified under the Conservation of Habitats and Species Regulations 2017 (as amended). The Regulations require the provision of a register of SPAs (along with other European sites) under the Birds Directive (Council Directive 79/409/EEC).
Special Areas of Conservation (SACs):
Special Areas of Conservation (SACs) are protected areas in the UK and in England are designated under the Conservation of Habitats and Species Regulations 2017 (as amended). The Regulations require the provision of a register of SACs (along with other European sites). Under these Regulations, the UK Government and devolved administrations are required to establish a network of important conservation sites which will contribute to conserving the habitats and species identified in Annexes I and II of the Habitats Directive (European Council Directive 92/43/EEC).
Sites of Special Scientific Interest (SSSIs):
Sites of Special Scientific Interest (SSSIs) are designated under the Wildlife and Countryside Act (1981), as amended. Modified provisions for the protection and management of SSSIs were introduced by the Countryside and Rights of Way Act 2000. SSSIs comprise the UK's finest sites and are typically designated on the basis of wildlife or geological interest.
National Nature Reserves (NNRs):
National Nature Reserves (NNRs) are declared under the National Parks and Access to the Countryside Act 1949 or the Wildlife and Countryside Act 1981 (as amended). NNRs comprise important habitats, species and geology in the UK and are open to the public.
Local Nature Reserves (LNRs):
Local Nature Reserves are designated under the National Parks and Access to the Countryside Act 1949, LNRs and are declared for nature conservation by principal local authorities following consultation with Natural England. LNRs comprise features of local wildlife or geological interest.
Hedgerows:
Hedgerows defined as 'Important' under the Hedgerow Regulation 1997 are protected from removal (uprooting or otherwise destroying). The definition of importance is based on a number of criteria in relation to wildlife, landscape or historical value, with hedgerows within or forming the curtilage of residential dwellings exempt.
Various Habitats:
Including Grassland, Arable Field Margins, Woodland, Rivers, Ponds, Open Mosaic Habitat on Previously Developed Land¹.
Section 41 of the NERC Act requires the Secretary of State to publish a list of habitats of principal importance (often referred to as Priority Habitats) for the conservation of biodiversity in England. Under Section 40 of the Act, the list should be used by local planning authorities, to have regard to the conservation of biodiversity in England. A total of 56 habitats, all identified on the UK Biodiversity Action Plan (BAP), are included on the S41 list.

Legislation – Species
European Protected Faunal Species:
Including, Creeping Marshwort, Early Gentian, Fen Orchid, Floating-leaved Water Plantain, Killaney Fern, Lady's Slipper, Shore Dock, Slender Naiad, Yellow Marsh Saxifrage¹.
Regulation 47 of the Conservation of Habitats and Species Regulations 2017 (as amended) provide protection to European Protected Species of plant. Under the regulations, it is an offence to deliberately or recklessly pick, collect, cut, uproot or destroy any listed plant at any stage of the plant's biological cycle.
European Protected Faunal Species:
Including, bats, Dormouse, Otter, Great Crested Newt, Natterjack Toad, Pool Frog, Sand Lizard, Smooth Snake, Large Blue Butterfly, Fisher's Estuarine Moth, Lesser Whirlpool Ram's-horn¹.
Regulation 43 of the Conservation of Habitats and Species Regulations 2017 (as amended) provide protection to European Protected Species of animals. Under the regulations, it is an offence to:
<ul style="list-style-type: none">• Deliberately capture, injure or kill any wild animal of a European Protected Species.• Deliberately disturb any wild animals of any such species, including in particular any disturbance likely to impair their ability to survive, to breed or reproduce, to rear or nurture their young, to hibernate or migrate, or which is likely to affect significantly their local distribution or abundance.• Deliberately take or destroy the eggs of such an animal.• Damage or destroy a breeding site or resting place of such an animal.
In accordance with these regulations, European Protected Species (EPS) licences can be granted by Natural England to permit activities that would otherwise be unlawful provided the development is for reasons of overriding public interest, there is no satisfactory alternative and the favourable conservation status of the species will be maintained or enhanced.
Protected Faunal Species:
Including, bats, Dormouse, Otter, Water Vole, Pine Marten, Great Crested Newt, Natterjack Toad, Pool Frog, Sand Lizard, Smooth Snake, White-clawed Crayfish, Roman Snail and a number of other invertebrate species¹.
These animals receive full protection under the Wildlife and Countryside Act 1981 (as amended), which makes it illegal (subject to certain exceptions) to:
<ul style="list-style-type: none">• Intentionally kill, injure or take any such animal.• Intentionally or recklessly damage, destroy or obstruct any place used for shelter or protection.• Intentionally or recklessly disturb such animals while they occupy a place used for shelter or protection.
Protected Faunal Species (partial protection only):
Including, Adder, Common Lizard, Grass Snake, Slow Worm¹.
These animals receive partial protection under the Wildlife and Countryside Act 1981 (as amended), which makes it illegal (subject to certain exceptions) to intentionally kill or injure these animals
Schedule 1 Birds
Protection is provided to birds listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). It is illegal to intentionally or recklessly disturb any bird listed on Schedule 1, or their dependent young while nesting. Protection with respect to nesting birds (set out below) also applies to Schedule 1 birds.

Appendix 2 - Summary of Relevant Legislation and Planning Policy

Legislation – Species
Nesting Birds
All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended), which makes it illegal to: <ul style="list-style-type: none">• Intentionally kill, injure or take any wild bird.• Take, damage or destroy the nest (whilst being built or in use) or eggs of any wild bird.
Badgers
Badgers are protected under the Protection of Badgers Act 1992. Under the Act it is an offence to: <ul style="list-style-type: none">• Wilfully kill, injure, take, possess or cruelly ill-treat* a Badger, or attempt to do so.• Intentionally or recklessly interfere with an active sett, including damaging or destroying a sett, obstructing access to a sett or disturbing Badgers using a sett. In England, licences can be obtained from Natural England to permit development activities that would otherwise be unlawful under the legislation.
Wild Mammals
The Wild Mammals (Protection) Act 1996 provides legal protection to all wild mammals against intentional harm or suffering.
Various Species:
Including, Hedgehog, Brown Hare, Polecat, Common Toad, all species of UK reptiles and a wide variety of plants, birds and invertebrates¹.
Section 41 of the NERC Act requires the Secretary of State to publish a list of species of principal importance (often referred to as Priority Species) for the conservation of biodiversity in England. Under Section 40 of the Act, the list should be used by local planning authorities, to have regard to the conservation of biodiversity in England. A total of 943 species, all identified on the UK Biodiversity Action Plan (BAP), are included on the S41 list.
Schedule 9 Invasive Species:
Including, Japanese Knotweed, Himalayan Balsam, Giant Hogweed, Various Cotoneasters, Rhododendron, American Mink, Muntjac Deer, Grey Squirrel, Italian Crested Newt, Alpine Newt, Signal Crayfish¹.
Certain non-native species of plants and animals have been identified as representing a threat to native species. Section 14 of the Wildlife and Countryside Act 1981 (as amended) prohibits the release or allowed spread of any such species listed on Schedule 9 into the wild.

¹ Where species/habitat lists are set out these are provided to give an indication of species included. These do not, and are not intended, to provide complete species/habitat lists.

Appendix 2 - Summary of Relevant Legislation and Planning Policy

Planning Policy
National Planning Policy Framework:
<p>The National Planning Policy Framework (NPPF) sets out policies to conserve and enhance the natural environment at Chapter 15 with the overarching aim of halting biodiversity loss (set out at paragraph 174). The NPPF is accompanied by Planning Practice Guidance on 'Biodiversity, ecosystems and green infrastructure' and ODPM Circular 06/200512.</p> <p>Paragraph 180 of the NPPF states:</p> <ul style="list-style-type: none">a) <i>When determining planning applications, local planning authorities should apply the following principles:</i>b) <i>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;</i>c) <i>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</i>d) <i>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</i>e) <i>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</i>f) <i>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.'</i>
National Planning Practice Guidance (NPPG):
<p>The National Planning Practice Guidance (NPPG) accompanies the NPPF, providing guidance on its interpretation. The NPPG includes guidance on how biodiversity should be taken into account when preparing a planning application, provides clarification on the interpretation of the mitigation hierarchy and sets out appropriate enhancement recommendations.</p>
Government Circular 06/05:
<p>Government Circular 06/05 'Biodiversity and Geological Conservation – Statutory obligations and their impact within the planning system' provides guidance on the application of legislation relating to planning and nature conservation in England and details on the implications of designations and protected habitats and species.</p>
Horsham District Planning Framework (November 2015)
<p>The Horsham District Planning Framework sets out policies to safeguard and enhance biodiversity, primarily within Policy 31: Green Infrastructure and Biodiversity. This includes protections to statutory ecological designations, promotion of green infrastructure, and positive contributions to biodiversity through new developments.</p>

Appendix 3 - Building Descriptions and Assessment of Bat Roosting Suitability

Building B1
Building Description:
Building B1 comprises a small, single skin, domed outbuilding used for storage, in a moderate state of repair. The roof is constructed of unlined corrugated asbestos, with an unlined corrugated metal gable end wall to the west and a block-built gable end to the east. A number of holes on the sides of the building have been repaired with patches. The lower walls are also block-built. The building is overgrown with Bramble/Ivy to the north and the east.
Assessment of Bat Suitability:
<i>Opportunities:</i> The building is in moderate condition, but comprises a single skin, lacking lining on the roof or walls. The vegetation on the north and east of the building likely obstructs access to the building, whilst the Ivy on the eastern elevation is interspersed with Bramble and unlikely to be suitable for roosting. The internal space is light and likely fluctuates in terms of temperature and humidity. Overall, the building is not of a construction type typically favoured by bats.
<i>Evidence:</i> A single likely bat dropping was recorded near the centre of the building. The dropping was not recorded below any suitable roost feature (given the general lack of suitable features). Given that access to the internal space is readily available via gaps around the door, the single dropping was attributed to a bat in flight. No further evidence was identified during the update inspection undertaken at the end of July.
<i>Level of Suitability:</i> Negligible
Photographs:
 

Appendix 3 - Building Descriptions and Assessment of Bat Roosting Suitability

Building B2
Building Description:
Building B2 is a garden shed in a good state of repair. The shed is used for storage of garden equipment. The shed is timber-built with a pitched roof supporting bitumen felt.
Assessment of Bat Suitability:
<i>Opportunities:</i> The building is of a construction type not typically favoured by bats and lacks opportunities for roosting.
<i>Evidence:</i> No evidence of roosting bats was recorded during the inspection survey work.
<i>Level of Suitability: Negligible</i>
Photographs:
 

Appendix 3 - Building Descriptions and Assessment of Bat Roosting Suitability

Building B3
Building Description:
Building B3 is a former chicken coop, in a good state of repair. The shed is used for storage of garden equipment. The shed is timber-built with a pitched roof supporting bitumen felt.
Assessment of Bat Suitability:
<i>Opportunities:</i> The building provides suitable access for roosting bats in the form of a large gap is present next to the door. However, the building is of a construction type not typically favoured by roosting bats and is draughty and open to the elements, with no enclosed roosting features/roosting opportunities for bats identified.
<i>Evidence:</i> No evidence of roosting bats was recorded during the inspection survey work.
<i>Level of Suitability: Negligible</i>
Photographs:


Appendix 3 - Building Descriptions and Assessment of Bat Roosting Suitability

Building B4
Building Description:
Building B4 is a metal-framed greenhouse in active use by the tenants.
Assessment of Bat Suitability:
<i>Opportunities:</i> The building is of a construction type not typically favoured by bats, being light and providing no suitable roosting opportunities for bats.
<i>Evidence:</i> No evidence of roosting bats was recorded during the inspection survey work.
<i>Level of Suitability: Negligible</i>
Photographs:


Appendix 3 - Building Descriptions and Assessment of Bat Roosting Suitability

Bat Emergence Survey – 30th July 2025

Position 1:



Position 2:





Essential Ecology

Essential Ecology Ltd
25 Katmandu Road
Bromsgrove
Worcestershire
B60 2SP

t: 07841 042796

e: info@essentialecology.co.uk

w: www.essentialecology.co.uk