From: Hannah McLaughlin <hannah.mclaughlin@dhaplanning.co.uk>
Sent: 05 March 2024 15:25
To: Kate.Turner
Subject: RE: DC/23/1979 Glebe Meadow Ashurst
Attachments: Preliminary Roosting Assessment and Barn Owl Scoping Survey v2.pdf; PS eco comments Glebe Meadow Ashurst DC231979.pdf

Good afternoon Kate,

Thank you for your email regarding application reference DC/23/1979.

It is noted that Place Services have queried whether there will be works involving the roof or frame of the building. To address those comments, please see attached an updated Preliminary Roosting Assessment and Barn Owl Scoping Survey which confirms that the roof and tiles will be untouched as a result of the proposed works and no alterations will be required for the internal timber structure.

There are crevices in the internal timber framework; however, the stable is open sided and exposed to the elements meaning the stables are unlikely to offer suitable internal conditions for roosting bats. The timber will also be untouched as a result of the proposed works.

In light of this, our ecologist continues to advise that the internal fit-out can be carried out under a Precautionary Method Statement for Bats. This would involve carrying out the works (only the works which are likely to cause most disturbance) when bats are least likely to be present (April or October), following a toolbox talk by a licensed bat ecologist.

The above is reflected in the revised report.

I trust this is helpful in addressing the comments raised. If there are any further questions or comments please do let us know.

Kind regards,

Hannah

Hannah McLaughlin
Associate

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From: Kate.Turner <Kate.Turner@horsham.gov.uk>
Sent: Thursday, February 22, 2024 9:41 AM
To: Hannah McLaughlin <hannah.mclaughlin@dhaplanning.co.uk>
Subject: FW: DC/23/1979 Glebe Meadow Ashurst

[External email - This message originated from outside DHA – prior to opening any attachments or opening links, please ensure their authenticity with the sender]
Dear Hannah

Please find ecology comments attached. Can you let me know if you plan to submit any further information?

Many Thanks,

Kate Turner
Senior Planning Officer (PartTime: Mon - Thurs)

Telephone: 01403 215184
Email: Kate.Turner@horsham.gov.uk

Horsham District Council

Horsham District Council, Parkside, Chart Way, Horsham, West Sussex RH12 1RL
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From: Gen Broad - Ecological Consultant <Gen.Broad@essex.gov.uk>
Sent: 22 February 2024 09:22
To: Kate.Turner <Kate.Turner@horsham.gov.uk>
Cc: Planning <planning@horsham.gov.uk>
Subject: DC/23/1979 Glebe Meadow Ashurst

Dear Kate

Please find attached our ecology comments on the above application.

Please contact us with any queries.

Best wishes
Gen

Genevieve Broad MCIEEM MSc BSc (Hons)
(Working Mon, Tue and Thu)
Ecological Consultant
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PRELIMINARY ROOST ASSESSMENT AND BARN OWL SCOPING SURVEY

Client: Mr. R. Russell

Site: Stables at Glebe Meadow, Church Lane, Ashurst, West Sussex

05.03.2024

Version 004



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DOCUMENT HISTORY AND STATUS

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Author	Martin Roche BSc (Hons) ACIEEM – Senior Ecologist Accredited Agent, NE Bat Class Licence: WML-CL18 Registration Reference: 2017-32546-CLS-CLS NE Great Crested Newt Class Licence: WML-CL08 Registration Reference: 2018-33257-CLS-CLS NE Hazel Dormouse Class Licence: WML-CL10a Registration Number: 2019-39316-CLS-CLS
Approver	Sarah Lyne CEnv BSc (Hons) MCIEEM – Managing Director and Principal Ecologist NE Bat Class Level 2 Licence: WML-CL18 Registration Reference: 2022-11232-CL18-BAT NE Great Crested Newt Licence: WML-CL08 Registration Number: 2016-2132-CLS-CLS European Protected Species Possession Licence: 2022-60725-SCI-SCI

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002	26.10.2023	1, 3, 18, 19, 20, 21 & 22	Addressed client comments.
003	27.02.2024	1, 2, 4, 13, & 15	Addressed client comments.
004	05.03.2024	1, 12, & 13	Addressed client comments.

Life Span of Survey Data and Report	
Report	This report remains valid for 12 to 18 months from date of issue. The report, conclusions and recommendations are valid for current development plans only. Should this change, the report should be reviewed and, if necessary, further survey work and desk study review undertaken.
Survey Data	Survey data are valid for 12 to 18 months from the date the survey was undertaken.

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The information which we have prepared and provided is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct.

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1. Summary

Site Details
• Site Address: The Stables, Church Lane, Ashurst, West Sussex, BN44 3AR. • OS grid reference: TQ 1771 1651. • Approximate Area of Stables: 71 m^2.
Scope of Works
• aLyne Ecology Ltd was commissioned by Mr. R Russell to undertake a Preliminary Roost Assessment, comprising an external and internal inspection for bats of the stables on site to inform an assessment of the suitability for summer roosting and winter hibernating bats. An assessment of habitats for their suitability to support foraging and commuting bats, was also made. • aLyne Ecology Ltd was also commissioned to undertake a Barn Owl Scoping Survey of the stables on site. An assessment of adjacent habitats for their potential to support Barn owls, was also made.
Development Proposals
• The development proposals are for the conversion of the stables into a holiday let, with the introduction of glazing on the open elevation and new windows to the rear. All other work will be related to internal fit-out. The roof and the tiles will be untouched, and no alterations are required for the internal timber structure.
Key Ecological Constraints and Opportunities
• The stables are situated adjacent to deciduous woodland and there are 13 other parcels of deciduous woodland within 1 km of the stables. • **The stables were assessed as having low suitability for roosting bats owing to the presence of external potential roosting features in the form of lifted profile tiles. There are also potential internal roosting features in the form of crevices in the timber framework; however, the stables are open sided and open to the eaves (lacks an enclosed roof void), meaning the stables are unlikely to offer suitable internal conditions for roosting bats.** • The habitats adjacent to the site could support foraging and commuting bats. • All British bat species, their roosts and their habitats are fully protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). • No signs of barn owl presence or activity were recorded in the stables. The stables have good access/egress for barn owls but lacks any enclosed roof voids/chimneys, platforms on timber beams, chambers within cavity walls or owl nest boxes, which could be used for breeding. There is also a large amount of light spill via the open-sided aspect of the stables. Furthermore, the stables are in use for storage, thereby reducing the likelihood that barn

owls will use the structures as a breeding/roosting site. **The stables have therefore been assessed as having negligible suitability for roosting and breeding barn owls.**

- The habitats located in the wider landscape could support foraging and breeding barn owls.
- Barn owls are listed under Schedule 1 of the Wildlife and Countryside Act, 1981 (as amended) and are protected against disturbance whilst nesting and it is illegal to take, damage or destroy the nests of barn owls whilst being built or in use.
- Nesting birds, including birds of conservation concern could potentially use the stables. Under the Wildlife and Countryside Act, 1981 (as amended), it is illegal to take, damage or destroy the nests of wild birds whilst being built or in use.
- Figure 1 provides the results of the survey.

Recommendations for Avoidance, Mitigation and Enhancement

- The stables could support roosting bats under the roof tiles. However, the works do not involve any alterations to the roof structure or removal (temporary or permanent) of roof tiles. There are crevices in the internal timber framework; however, the stable is open sided and exposed to the elements meaning the stables are unlikely to offer suitable internal conditions for roosting bats. Therefore, the internal fit-out can be carried out under a Precautionary Method Statement for Bats. This would involve carrying out the works (only the works which are likely to cause most disturbance) when bats are least likely to be present (April or October), following a toolbox talk by a licensed bat ecologist.
- A sensitive lighting plan should be adopted, to ensure that outside lighting does not adversely affect adjacent habitats and wildlife, particularly bats when foraging and commuting.
- Works to the stables should be undertaken outside of the bird breeding season (March to August inclusive) to avoid destruction/disturbance of nesting birds.
- Below is a summary of measures, which should be implemented on site to improve the site's suitability for nesting birds:
    - The installation of a barn owl box on a suitable building or tree.
    - The installation of a sparrow nest box on a suitable building.

Further Survey Requirements

- None (providing the roof structure is not proposed to be altered).

2. Introduction

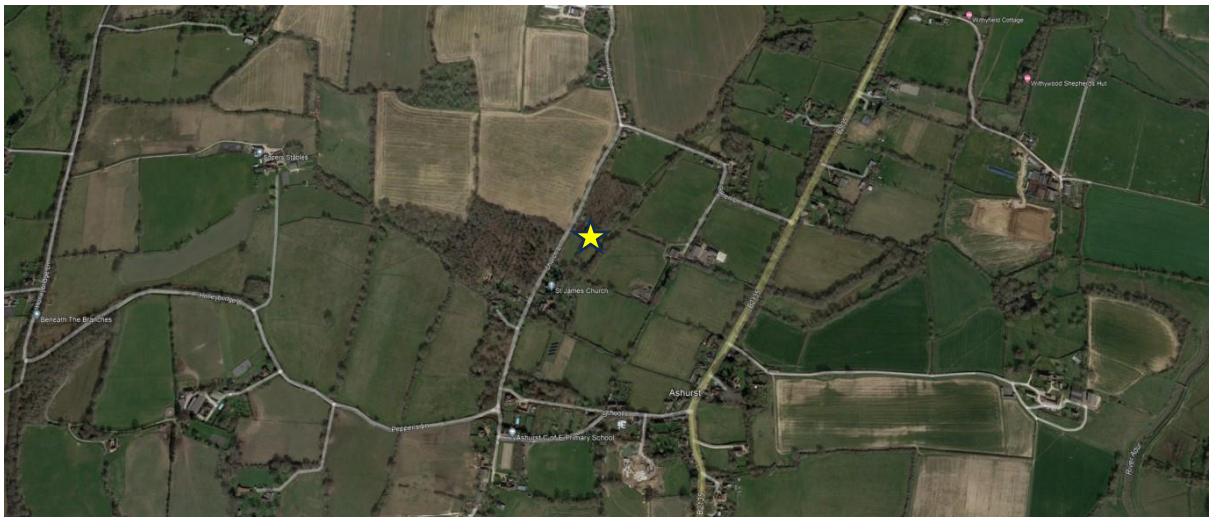
2.1 Site Details

Table 1 provides details on the site, intended as a summary of key features. Information provided in Tables 1 and 3 have been derived from www.magic.gov.uk.

Table 1. Site Details

Site Name	Stables at Glebe Meadow, Church Lane, Ashurst, West Sussex
Site Address	The Stables, Church Lane, Ashurst, Steyning, West Sussex, BN44 3AR
OS Grid Reference	TQ 1771 1651
Approximate Total Area (Ground Floor Footprint of the Stables)	71 m^2
Landowner and Local Authority	Mr. R Russell, Horsham District Council
Geology and Soils	Slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils
Hydrology	Impeded drainage
Nature Conservation Designations	None on site
Other Designations	None on site
The Woodland Trust Ancient and Notable Tree Inventory	None on site
Biodiversity Opportunity Area	None on site
National Habitat Network	None on site
Primary Habitats	Developed land; sealed surface and buildings
Protected Species	Potential for nesting birds and roosting bats (low suitability)
Current Land Use	Equestrian

An aerial plan showing the location of the site is provided below.



Site Location (© Google Earth Pro, accessed 20th September 2023).

Table 2 provides detailed descriptions of the stables on site.

Table 2. Description of Stables

Building Reference	External Structure	Internal Structure
The Stables	Single-storey L-shaped stables, comprising a red brick plinth and timber clad walls. The roof has two hipped ends and comprises clay tiles. The southern elevation is open, and the west-facing elevation has a door and two glass windows.	No enclosed roof voids present.

2.2 Site Context

Table 3 provides details on the context of the site in terms of habitats, land use and connectivity to the wider landscape.

Table 3. Site Context

Surrounding Habitats and Land Use	Rural location, with deciduous woodland immediately adjacent to the north, with rural, scrub and grassland on the other aspects. The wider landscape is characterised by open grazed pasture, arable and parcels of deciduous woodland.
Urban Context / Locality	The site is located north of Ashurst, west of Henfield and north of Steyning.
Connectivity to Wider Landscape	Via deciduous woodland to areas of key roosting/foraging/commuting habitat for bats and barn owls located in the wider landscape.
Priority Habitats within 1 km	• Deciduous woodlands. • Traditional orchards. • Rivers/streams. • Ponds.
Ancient Woodland within 1 km	None.
Non-Statutory Designated Sites within 1 km	Not known
Statutory Designated Sites within 1 km	None
European Designated Sites within 5 km	None
(European Protected Species Licences) EPSLs within 2 km	None

2.3 Proposed Development

The development proposals are for the conversion of the stables into a holiday let, with the introduction of glazing on the open elevation and new windows to the rear. All other work will be related to internal fit-out. The roof and the tiles will be untouched, and no alterations are required for the internal timber structure.

2.4 Brief and Objectives

The purpose of the Preliminary Roost Assessment was to:

- Assess the suitability of the stables on site to support bat roosts, including those used by winter hibernating bats.

- Search for potential access/egress points for bats.
- Search for signs of bats.
- Assess the value of the immediate environs for their use by bats.
- Make recommendations for mitigation and/or further survey work, as appropriate to ensure the works remain within the law in relation to wildlife.

The purpose of the barn owl scoping survey was to:

- Assess the potential of the stables on site to support both breeding and roosting barn owls.
- Search for signs of barn owl activity i.e., regurgitated pellets, droppings, or moulted feathers.
- Assess the value of adjacent habitats for their potential to support barn owls.
- Make recommendations for avoidance, mitigation, and enhancement, as appropriate.

3. Relevant Legislation and Planning Policy

3.1 Bats

All UK bat species and their roosts are fully protected under Schedule 5 of the Wildlife & Countryside Act 1981 (as amended). All bats are also included in Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended), which defines "European protected species of animals" and are afforded further protection through the Countryside and Rights of Way (CRoW) Act, 2000.

The combined legislation makes it illegal to:

- Intentionally kill, injure, or capture bats.
- Deliberately disturb bats (whether in a roost or not).
- Damage, destroy or obstruct access to bat roosts.
- Possess or transport a bat or any part of a bat, unless acquired legally.
- Sell, barter or exchange bats, or parts of bats.

As a signatory to the Bonn Convention (Agreement of Bats in Europe), the UK is also required to protect their habitats, requiring the identification and protection from damage or disturbance of important feeding areas.

In this interpretation, a bat roost is "*any structure or place which any bat uses for shelter or protection*". Because bats tend to reuse the same roosts, legal opinion is that the protection of bat roosts are considered to apply regardless of whether bats are present or not. There is currently no guidance on when a roost ceases to be protected if it is not used by bats.

Under S.9(4)(b) of the Wildlife and Countryside Act 1981 (as amended) (WCA) it is an offence to intentionally or recklessly disturb a bat '*while it is occupying a structure or place which it uses for shelter or protection*'. However, R.39(1)(b) of the Habitats Regulations states: '*A person commits an offence if they - (b) deliberately disturb animals of any such species* (including bats*) in such a way as to be likely significantly to affect — (i) the ability of any significant group of animals of that species to survive, breed, or rear or nurture their young, or (ii) the local distribution or abundance of that species'*. The loss or damage of habitats, which are important for foraging and commuting bats, could result in roosts being abandoned and bats not being able to forage. Therefore, it can be concluded that the Habitat Regulations affords protection to bat foraging and commuting habitats.

If planned works would constitute an offence, they may only be carried out under licence from Natural England. Works or mitigation activities involving interference with bats or bat shelters must be carried out by a licensed bat worker (with a Natural England Bat Licence).

Furthermore, the Natural Environment and Rural Communities Act (NERC Act) 2006, requires due consideration be given to biodiversity and its potential enhancement when considering proposed developments. Several bat species are listed as species of principal importance.

The National Planning Policy Framework, 2021 (NPPF) sets out government policy on biodiversity in planning decisions. Under the NPPF, the presence of a protected species is a material consideration when a planning authority is considering a development proposal.

3.2 Barn Owls

All wild birds are protected through the WCA which makes it an offence to:

- Intentionally kill, injure or take a wild bird;

- Take, damage or destroy a nest (while in use or under construction);
- Take, damage, or destroy its eggs; or
- Possess wild birds (dead or alive) or their eggs.

The barn owl is also specially protected on Schedule 1 of the WCA from intentional or reckless actions that may cause disturbance in the breeding season.

4. Methods

4.1 Preliminary Roost Assessment

The stables on site were surveyed both externally and internally for evidence of (and suitability for) bats. The survey was undertaken by Martin Roche BSc (Hons) ACIEEM (Accredited Agent, NE Bat Class Licence: WML-CL18 Registration Reference: 2017-32546-CLS-CLS) on 27th September 2023.

The assessment was carried out following current best practice guidance, published by the Bat Conservation Trust (Collins, 2016).

4.1.1 External and Internal Inspection

The external inspection was undertaken during daylight hours from ground level using binoculars and a high-powered torch. The following evidence was sought:

- The presence of potential access and egress routes for bats into and out of likely roosting sites and evidence of the use of such potential access points by bats such as scattered droppings, urine staining or scratching around entrances.
- Feeding remains.
- Bat droppings.
- Likely commuting routes and nearby habitat assessment for potential use by bats.
- Any other signs of use by bats including the presence of bats themselves.

The internal inspection was undertaken during daylight hours and was aided by a high-powered torch. All areas accessible to bats were searched for evidence of bat droppings and feeding remains. Internal signs of roost access and egress points were also identified, for example light shining into internal building spaces from the exterior of the buildings, or damage to the internal lining of the roof.

Bats regularly utilise specific areas within buildings (see below), which were searched as a priority for any bat field signs.

- Dividing walls/chimney breasts.
- Underneath ridge beams.
- Beneath hip joints and junctions.
- Timber/wall joints.
- Staining above/around gaps.
- Droppings around ridge tiles and gaps.

Roosting bats and signs of their presence are not always visible, so any potential bat roosting locations were also noted during the survey.

The building was assessed for its suitability to support winter hibernating bats, considering aspects such as temperature and humidity conditions during the winter period and depth and exposure of features, which could be used by hibernating bats.

4.1.2 Foraging and Commuting Habitats

Habitats within and adjoining the site, which could support foraging and commuting bats were also recorded during the survey, including connectivity to the wider landscape. Habitats, which typically support foraging and commuting bats, include the following examples:

- Woodland.
- Lines of trees.
- Hedgerows and woodland edges.
- Streams and rivers.
- Grazed grassland.

4.1.3 Categorisation of Summer Roosting and Winter Hibernation Suitability

Following the assessment, the stables were categorised as having negligible, low, moderate, or high suitability or a confirmed bat roost. The categories were based on the observations and information set out in Table 4. The Rationale is adapted from Collins J, 2016 Table 4.1 page 35 and '*Assessing Sites for Hibernation Potential. A Practical Approach, including a Proposed Method & Supporting Notes'*, Middleton, 2019.

Table 4. Guidelines for Assessing Summer Roosting and Winter Hibernation Suitability

Level of Suitability	Summer Roosting and Winter Hibernation Suitability Rationale
Negligible	Building or tree with no or very limited roosting opportunities for bats, no evidence of use by bats and where the structure is isolated from foraging habitat. No features suitable for hibernation.
Low	Building with a low number of roosting opportunities and with limited connectivity to foraging habitat. Building has no evidence of current use by bats. Examples of features include gaps under facia boards, under lifted roof tiles, or under lifted lead flashing in an urban setting. A tree, of sufficient size and age, with only a very limited number of potential roosting opportunities and has no evidence of current use by bats. The tree has limited connectivity to foraging habitat. Limited external features suitable for hibernation, which are exposed and/or shallow (less than 10 cm deep) and/or could be fully viewed. Features, which cannot support more than one or two bats, and will not provide protection from the weather or provide favourable temperature and humidity conditions. Features, which could support summer roosting bats, have been assessed as having low suitability.
Moderate	Building with features present that are suitable for roosting bats and with connectivity to foraging habitat. Building has no evidence of current use by bats. Examples of features include cracks in walls and presence of a wooden soffit box with access points in a suburban/rural setting. A tree, of sufficient size and age, with one or more potential roosting opportunities and has no evidence of current use by bats. The tree is surrounded by suitable roosting, foraging and commuting habitat but is unlikely to support a roost of high conservation status. Non-classic features, which could support hibernating bats, such as cracks in walls, lifted roof tiles, crevices in roof void. Likely to support no more than about three bats, where full protection from the weather is offered. The potential for suitable temperature and humidity conditions exists. Features, which could support summer roosting bats, have been assessed as having moderate suitability.
High	Building with features that are highly suitable for roosting bats and with good connectivity to quality foraging habitat such as woodland or lakes. Building has no evidence of current use by bats. Examples include large uncluttered, draft-free loft spaces with access points or gaps under hanging tiles in a rural setting.

Level of Suitability	Summer Roosting and Winter Hibernation Suitability Rationale
	A tree, of sufficient size and age, with one or more potential roosting opportunities that are likely to support a large number of bats on a regular basis but has no evidence of current use by bats. The tree is surrounded by suitable roosting, foraging and commuting habitat and could potentially support a roost of high conservation status. Classic features, which could support hibernating bats, such as caves, tunnels, ice houses and cellars. Features are present externally and/or internally. Temperature and humidity conditions are stable. Could support larger numbers of bats.
Confirmed Roost	Presence of bats or evidence of use by summer roosting bats. Presence of bats or evidence of use by winter hibernating bats.

4.1.4 Categorisation of Foraging and Commuting Suitability

The site was assessed for its suitability to support foraging and commuting bats, which is set out in Table 5.

Table 5. Guidelines for Assessing Potential for Foraging and Commuting Bats (adapted from Collins J, 2016 Table 4.1 page 35)

Level of Suitability	Foraging/Commuting Suitability Rationale
Negligible	Negligible habitat features on site likely to be used by commuting or foraging bats.
Low	Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland, or water.
High	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats 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, treelined watercourses and grazed parkland. Site is close to and connected to known roosts.

4.2 Barn Owls Scoping Survey

The stables on site were surveyed both externally and internally for evidence of barn owl breeding and roosting activity by Martin Roche BSc (Hons) ACIEEM on 27th September 2023.

A walkover of the site was conducted during daylight hours using binoculars and a high-powered torch. The following evidence of barn owl activity was sought:

- Regurgitated pellets.
- Droppings.
- Moulted adult and juvenile feathers.

- Eggs/eggshells.
- Potential access/egress points.
- Presence of potential breeding/roosting sites located adjacent to the site and suitability of surrounding habitat for foraging Barn owls.
- Any other signs of use by Barn owls including the presence of Barn owls themselves.

4.3 Survey Limitations

There were no limitations considered to negatively influence the Preliminary Roost Assessment or barn owl scoping survey in relation to the following:

- Personal competence, i.e., qualifications, training, skills, understanding, experience.
- Resources (equipment and personnel).
- Time spent surveying.
- Data (e.g., arising from incomplete or inappropriate surveys).
- Timing or seasonal constraints and suboptimal survey periods.

5. Results

5.1 Preliminary Roost Assessment

For the results of the Preliminary Roost Assessment, see Figure 1. Table 6 provides the results of the external and internal inspection of the stables on site.

5.1.1 External and Internal Inspection

Table 6. Results of Preliminary Roost Assessment

Building Reference	External Potential Roosting Features	Internal Potential Roosting Features	Potential Access/Egress Points	Signs of Bats
Stables	Lifted profile roof tiles	Gaps between the timber framework	Open-sided	None recorded

5.1.2 Foraging and Commuting Habitats

Table 7 details the habitats, which were recorded on and adjoining the site, which have suitability to support foraging and commuting habitats.

Table 7. Foraging and Commuting Habitats

Habitat / Feature Description	Connectivity to Potential Roost	Connectivity to Wider Landscape
Deciduous woodland	Adjacent to the stables and with habitat connectivity to other areas of deciduous woodland in the wider landscape	Via other areas of deciduous woodland to open grassland, and waterbodies in the wider landscape. Buildings in locality are likely to support roosting bats

5.1.3 Categorisation of Summer Roosting and Winter Hibernation Suitability

Table 8 details the categorisation of summer roosting and winter hibernation potential for the stables on site.

Table 8. Categorisation of Summer Roosting and Winter Hibernation Suitability

Building Reference	Categorisation of Summer Roosting Suitability	Categorisation of Winter Hibernation Suitability	Justification
The Stables	Low	Negligible	The stables were assessed as having low suitability for roosting bats owing to the presence of external potential roosting features in the form of lifted profile tiles. The weather boarding and eaves are in good order and there are no gaps to provide suitable roosting opportunities for bats. There are potential internal roosting features in the form of crevices in the timber framework; however, the stables are open sided and open to the eaves (lacks an enclosed roof void), meaning the stables are unlikely to offer suitable internal conditions for roosting bats.

5.1.4 Categorisation of Foraging and Commuting Suitability

Table 9 details the categorisation of habitats within/adjoining the site for their suitability to support foraging and commuting habitats for bats.

Table 9. Categorisation of Bat Foraging and Commuting Suitability

Habitat / Feature	Categorisation of Suitability	Justification
Deciduous woodland	High	Habitats on site (hard standing and buildings) offer negligible foraging suitability for bats but habitats adjacent to the site (deciduous woodland) provide higher value

5.2 Barn Owl Scoping Survey

No evidence of breeding or roosting barn owls was recorded during the internal and external inspection of the stables. The stables gave good access/egress for barn owls on the southern elevation as it is open-sided and large levels of light spill was recorded within the roof structure as a result.

The habitats immediately adjacent to the stables (hard standing, open grassland and woodland) offer good foraging potential for barn owls.

6. Evaluation

6.1 Preliminary Roost Assessment

The stables have been assessed as having low suitability for summer roosting bats, in accordance with guidelines set out by the Bat Conservation Trust (Collins, 2016). Recommendations have been provided in Section 7.1.

The habitats adjacent to the stables were determined to have high suitability to support foraging and commuting habitats for bats. Therefore, a sensitive lighting plan for bats has been provided in Section 7.2.

6.2 Barn Owl Scoping Survey

The stables are located within a wider landscape characterised by extensive areas of farmland and pasture, including scattered residential and light industrial buildings, which could potentially support nesting and roosting barn owls.

However, no signs of barn owl presence or activity were recorded in the stables. The stables have good access/egress for barn owls but lacks any enclosed roof voids/chimneys, platforms on timber beams, chambers within cavity walls or owl nest boxes, which could be used for breeding. There is also a large amount of light spill via the open-sided aspect of the stables on the southern elevation. Furthermore, the stables are in use for storage, thereby reducing the likelihood that barn owls will use the structures as a breeding/roosting site.

Therefore, the stables was determined to provide no breeding or roosting opportunities and has been assessed as having negligible potential to support barn owls.

As other bird species, including birds of conservation concern, could potentially use the stables for nesting, precautionary recommendations have been provided in Section 7.3, which detail avoidance measures for all nesting birds. Recommendations have also been made for ecological enhancements that should be implemented on site and within surrounding habitats to improve the site's suitability for birds of conservation concern.

7. Recommendations

7.1 Bats – Avoidance Measures

The stables could support roosting bats under the roof tiles. However, the works do not involve any alterations to the roof structure or removal (temporary or permanent) of roof tiles. There are crevices in the internal timber framework; however, the stable is open sided and exposed to the elements meaning the stables are unlikely to offer suitable internal conditions for roosting bats. Therefore, the internal fit-out can be carried out under a Precautionary Method Statement for Bats. This would involve carrying out the works (only the works which are likely to cause most disturbance) when bats are least likely to be present (April or October), following a toolbox talk by a licensed bat ecologist.

As the stables could support a bat roost, chemical products approved by Natural England, which are safe to use in or near bat roosts should only be used, if required. A list of these products can be found at https://www.gov.uk/government/publications/bat-roosts-insecticides-and-timber-treatments/timber-treatment-products-suitable-for-use-in-or-near-bat-roosts.

7.2 Bats – Sensitive Lighting Plan

Recommendations to minimise the potential impacts of artificial external lighting on bat activity, are provided below (Institute of Ecology and Environmental Management, 2006: Institute of Lighting Engineers, 2007 and Bat Conservation Trust, 2018):

- Security lighting should be avoided on the western boundary of the site.
- Lighting that is required for security or safety reasons, should use a lamp of no greater than 2000 lumens (150 Watts) and should comprise sensor activated lamps.
- LED luminaires with a warm white spectrum (<2700 Kelvin) are the preferred option and should be used where possible. Luminaires should feature peak wavelengths higher than 550 nm to minimise disturbance to bats. All luminaires should lack UV elements, metal halide and fluorescent sources should not be used.
- Lighting should be directed to where it is needed with minimal light spillage. This can be achieved by using as steep a downward angle as possible and/or a specialist bollard that directs the light below the horizontal plane.
- Artificial lighting should not directly illuminate any potential bat roosting features or habitats of value to foraging bats, i.e., woodland.

7.3 Breeding Birds

Works to the stables should be undertaken outside of the bird breeding season (March to August inclusive) to avoid destruction/disturbance of nesting birds. However, if works which are likely to damage bird nests need to be carried out during the nesting period, there is potential that nesting birds could be harmed and disturbed. To ensure legal compliance, a check should be undertaken by an ecologist within 48 hours of works commencing, to confirm the presence/absence of nest sites. If nests sites are identified, works to that feature should be delayed until the nest site becomes inactive (species specific, but approximately 4-6 weeks maximum).

Recommendations to enhance the site and surrounding habitats for breeding birds that are likely to be on site are provided below:

- A nest box for barn owls should be erected on an external wall of the stables or on mature isolated trees located within hedgerows or woodland edges. The box should be placed at least 3 metres above ground level and facing away from any light disturbance. These boxes can be purchased from www.barnowltrust.org.uk.
- The installation of a Sparrow Terrace Nest Box on the stables would be beneficial to bird species of conservation concern that have been observed on site. These nest boxes can be purchased from https://www.nhbs.com/.

8. References

Bat Conservation Trust. (2018). *Bats and Artificial Lighting in the UK, Guidance Note 08/18*. Institution of Lighting Professionals.

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Collins, J. (2016). *Bat Surveys for Professional Ecologists. Good Practice Guidelines (3rd edition).* Bat Conservation Trust, London.

HM Government (2021) *National Planning Policy Framework*. Department for Communities and Local Government. HMSO.

HM Government (2005) *ODPM Circular 06/05 Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System.* HMSO.

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Mitchell-Jones, A. J. (2004). *Bat Mitigation Guidelines*. English Nature (now Natural England), Peterborough.

Shawyer, C. R. (2011). *Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment: Developing Best Practice in Survey and Reporting.* IEEM, Winchester.

9. Figure 1 – Results of Preliminary Roost Assessment



Building B1 — External Inspection, Southern Elevation





Key:

Lifted Tiles

aLyne ecology
London & South East
Tel: 01372 602372
Mob: 07443 652988

Client: Mr. Robert Russell

Project Title: Stables at Glebe Meadow, Church Lane, Ashurst, West Sussex

Figure Number, Version: Figure 1b, 001

Date: 26.10.2023

Figure Title: Results of Preliminary Roost Assessment

Habitat locations and extent are approximate. Not to scale.
Photographs taken on 27.09.2023

Building B1 — External Inspection, Northern Elevation



Key:

Lifted Tiles

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London & South East
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Client: Mr. Robert Russell

Project Title: Stables at Glebe Meadow, Church Lane, Ashurst, West Sussex

Figure Number, Version: Figure 1c, 001

Date: 26.10.2023

Figure Title: Results of Preliminary Roost Assessment

Habitat locations and extent are approximate. Not to scale.
Photographs taken on 27.09.2023

Building B1 — External Inspection, Western Elevation





Key:

Lifted Tiles

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Client: Mr. Robert Russell

Project Title: Stables at Glebe Meadow, Church Lane, Ashurst, West Sussex

Figure Number, Version: Figure 1d, 001

Date: 26.10.2023

Figure Title: Results of Preliminary Roost Assessment

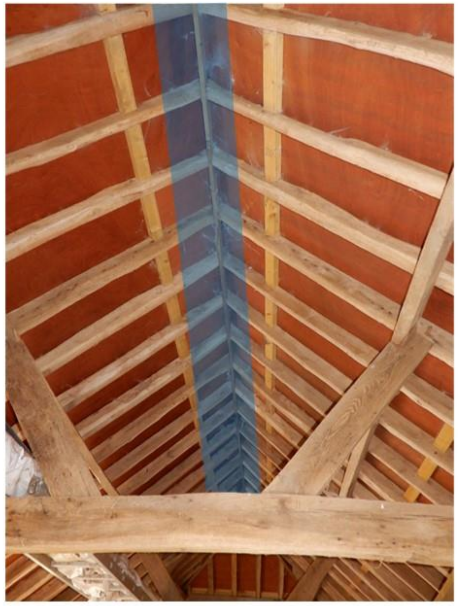
Habitat locations and extent are approximate. Not to scale.
Photographs taken on 27.09.2023

Building B1 — Internal Inspection









Key:

Crevices in Timber Framework

aLyne ecology
London & South East
Tel: 01372 602372
Mob: 07443 652988

Client: Mr. Robert Russell

Project Title: Stables at Glebe Meadow, Church Lane, Ashurst, West Sussex

Figure Number, Version: Figure 1e, 001

Date: 26.10.2023

Figure Title: Results of Preliminary Roost Assessment

Habitat locations and extent are approximate. Not to scale.
Photographs taken on 27.09.2023

22 February 2024

Kate Turner
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

By email only

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Horsham District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Dear Kate

Application: **DC/23/1979**
Location: **Stables at Glebe Meadow Church Lane Ashurst Steyning West Sussex BN44 3AR**
Proposal: **Change of use of existing stable building into a holiday let, alongside building operations including the introduction of infill glazing and windows, together with the provision of parking and other associated works.**

Thank you for consulting Place Services on the above application.

a) No ecological harm/No objection	
b) Requires further information on European Protected Species (bats)	Yes
c) Recommend grant permission subject to conditions	
d) Recommend refusal	
e) Subject to Natural England's formal comments on the conclusion of the Water Neutrality Appropriate Assessment	Yes
f) Discharge of condition	

Please note that following receipt of Natural England's position statement on developments in the Sussex North Water Supply Zone, decisions on planning applications should await the completion of a Sussex North water neutrality strategy unless they can demonstrate water neutrality.

Summary
We have reviewed the Preliminary Roost Assessment and Barn Owl Scoping Survey Version 002 (aLyne Ecology, October 2023), supplied by the applicant, relating to the likely impacts of development on protected & Priority species and habitats, and identification of proportionate mitigation.

We note from Section 5.1.3 of the Preliminary Roost Assessment and Barn Owl Scoping Survey Version 002 (aLyne Ecology, October 2023) that the stables have low bat roost potential due to lifted tiles and potential internal roost features in the form of crevices in the timber framework. Section 7.1 states that the work can proceed under a non-licensed Precautionary Method Statement for bats 'providing the works do not involve any alterations to the roof structure or removal (temporary orpermanent) of roof tiles'. However, it is not clear if there will be works involving the roof (particularly as there are lifted tiles) and there could be bats within the timber framework of the building, as stated.

There are numerous records of bats close to the site: five records for Common Pipistrelle, Soprano Pipistrelle and Brown Long-eared bat within 20m to the south; one record for Common Pipistrelle 40m to the northeast and five records for Brown Long-eared bat and Common Pipistrelle within 1km to the south (Sussex Biodiversity Record Centre – accessed under licence). We therefore recommend that further assessment for bats should be undertaken in accordance with the 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023).

The above information is required prior to determination because paragraph 99 of ODPM Circular 06/2005 highlights that: "*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.*"

This information is required to provide the LPA with certainty of impacts on legally protected species and be able to secure appropriate mitigation either by a mitigation licence from Natural England or a condition of any consent. This will enable the LPA to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006 and prevent wildlife crime under s17 Crime and Disorder Act 1998.

We note that the stables have negligible potential to support Barn Owl (the Preliminary Roost Assessment and Barn Owl Scoping Survey Version 002 (aLyne Ecology, October 2023) and therefore agree that no further surveys are required for this species.

Please note that we no longer provide comments on Great Crested Newt as we have been been instructed to leave comments on this European Protected Species to the NatureSpace Partnership.

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Please contact us with any queries.

Yours sincerely

Genevieve Broad MCIEEM MSc BSc (Hons)
Ecological Consultant
Place Services at Essex County Council
placeservicesecology@essex.gov.uk

Place Services provide ecological advice on behalf of Horsham District Council
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.