



Preliminary Ecological Appraisal

Beckley Stud, Reeds Road,
Southwater, RH13 9DQ

Executive Summary

This Preliminary Ecological Appraisal (PEA) establishes baseline conditions at Beckley Stud, Reeds Lane, Southwater, West Sussex (TQ 16126 25788). The 0.468 ha equestrian site comprises predominantly hardstanding (0.440 ha), modified grassland (0.021 ha), and minor unsealed surfaces (0.007 ha). The proposal involves constructing a single-storey storage barn on existing hardstanding and extending the yard by approximately 20 m² into modified grassland for parking. No trees, hedgerows, or linear features will be affected.

Three habitat types were recorded (survey: 18 November 2025): sealed hardstanding (zero biodiversity value), heavily managed modified grassland (low distinctiveness), and negligible-value unsealed surfaces. No Section 41 priority habitats occur on-site. Local records identify bats, dormice, great crested newts, and priority birds within 1 km; however, site habitats offer very low suitability for protected species, lacking roosting, nesting, or foraging features.

The development qualifies for Biodiversity Net Gain exemption under Regulation 4 (De Minimis) of The Biodiversity Gain Requirements (Exemptions) Regulations 2024. The proposal (a) affects no priority habitats, (b) results in <25 m² loss of non-zero-value habitat, and (c) impacts no linear features. Consequently, the statutory 10% BNG requirement does not apply.

In accordance with NPPF (2024) Paragraph 99 and Horsham District Policy 31, proportionate mitigation and enhancement measures will be implemented:

- Avoid vegetation clearance during the bird breeding season (March–August).
- Retain and enhance 190 m² of grassland through wildflower seeding and adjusted grazing.
- Introduce native tree/shrub planting along the northern boundary.
- Install 3 bat boxes, 4 bird nest boxes (house sparrow, tit, robin/blackbird, swift), and hedgehog access openings (13 × 13 cm).
- Integrate SuDS features to treat surface runoff.
- Employ sensitive lighting (≤2700 K LEDs, motion sensors, downward focus) in line with Bat Conservation Trust guidance.

Newfoundout Copse (ancient woodland) lies east of the site across Reeds Lane. No hydrological or physical impact pathways exist, and standard construction controls (dust suppression, containment, material management) will avoid secondary effects.

In summary, the proposal results in minimal habitat loss (<0.5% of site area), presents negligible risk to protected or priority species, meets exemption criteria under SI 2024/47, and provides proportionate ecological enhancement. No additional surveys, species licences, or mitigation beyond those outlined are required.

Contents

Introduction	4
Background and Purpose	4
Site Description.....	4
Proposed development.....	5
Relevant Planning Policies and Legislation.....	6
Methodology	9
Desk Study	9
Data Sources and Search Areas	9
Field Survey.....	10
Habitat Impact Quantification and Mapping	10
BNG Exemption Assessment	11
Biodiversity Enhancement	11
Limitations.....	11
Data validity	12
Results.....	13
Desk Study Results	13
Designated Sites.....	13
Field Survey Results.....	14
Habitats.....	14
Protected and Priority Species	16
Biodiversity Net Gain (BNG) Exemption.....	18
Ecological Constraints and Opportunities	19
Constraints.....	19
Opportunities	21
Mitigation Hierarchy.....	22
Further Survey Recommendations.....	23
References	24
Appendix 1 – Habitat Map – UKHab/BNG.....	25

Introduction

Background and Purpose

This Preliminary Ecological Appraisal (PEA), including a Biodiversity Net Gain (BNG) exemption statement has been prepared on behalf of Equine America, to inform proposed development at Beckley Stud, Reeds Road, Southwater, RH13 9DQ. The report supports the planning process by identifying the ecological value of the site and establishing a biodiversity baseline in accordance with current UK legislation and Horsham District Council requirements.

The aims of this report are to:

Undertake a Preliminary Ecological Appraisal (PEA):

- Complete an Extended UK Habitat Classification (UKHab) survey to identify and map all habitat types present on site.
- Assess the potential for the site to support protected and notable species, using both field survey and desk-based review of local biological records.

Establish BNG exemption:

- Determine whether the proposed development is likely exempt from statutory BNG requirements, based on the habitats on site and the footprint of the works.

Inform Planning and Design:

- Provide recommendations for further surveys, mitigation, and opportunities for ecological enhancement.
- Present clear, robust baseline data to support planning applications and future ecological management of the site.

This report incorporates the results of the field survey, desk study, habitat mapping, condition assessments, and BNG exemption assessment. It is intended for use by the client, design team, and planning authority to guide the development process and support a successful planning application.

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

Site Description

Beckley Stud is located at Reeds Lane, Southwater, West Sussex, RH13 9DQ, within Horsham District Council's planning jurisdiction. The site is centered at National Grid Reference TQ 16752 27826. The site encompasses approximately 0.462 hectares within the red line boundary, bounded by post-and-rail timber fencing to the west and south, and mature hedgerows to the north and east. The site benefits from good road access via Reeds Lane.

The site is situated within a semi-rural landscape characteristic of West Sussex, with mixed agricultural use, deciduous woodland patches, and scattered residential properties. It is located outside any statutory conservation designations, conservation areas, or other heritage protection zones. The red line boundary encompasses 0.468 hectares, comprising predominantly sealed hardstanding (4,400 m²; representing existing yard operations), with secondary parcels of modified grassland (210 m²) and minor unsealed surface with raised bed planters (70 m²). Ancient woodland (Newfoundout Copse) is located immediately adjacent to the eastern boundary, 15 metres from the site entrance.

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



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

Proposed development

The 'proposed development' comprises erection of a single-storey storage barn at Beckley Stud equestrian yard, Reeds Lane, Southwater.

The barn is positioned on existing hardstanding within the operational yard, adjacent to established working areas. The structure is served by roller-shutter doors on east and west elevations for vehicle and material access. External finishes will match existing equestrian buildings, maintaining visual coherence with the established yard cluster.

The building footprint sits entirely within the existing developed area of Beckley Stud. A 20 m² parking extension onto modified grassland is required to maintain operational circulation; this represents the only incursion beyond current hardstanding. The proposal avoids all grassland paddocks, bramble scrub, and boundary hedgerows. No trees, hedgerows or linear features are removed, and development does not extend beyond the existing operational yard boundary. Mature tree cover to the north provides screening in the wider landscape.

The barn is accessed via the existing vehicular entrance from Reeds Lane; no new access tracks or boundary alterations are required. Construction activities and contractor facilities remain within the developed yard to prevent disturbance to adjacent habitats.

No external lighting is specified in the submitted plans. Any future barn-associated lighting will comply with bat-sensitive design principles, employing warm, low-intensity, downward-directed fittings to prevent light spill onto boundary vegetation.

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

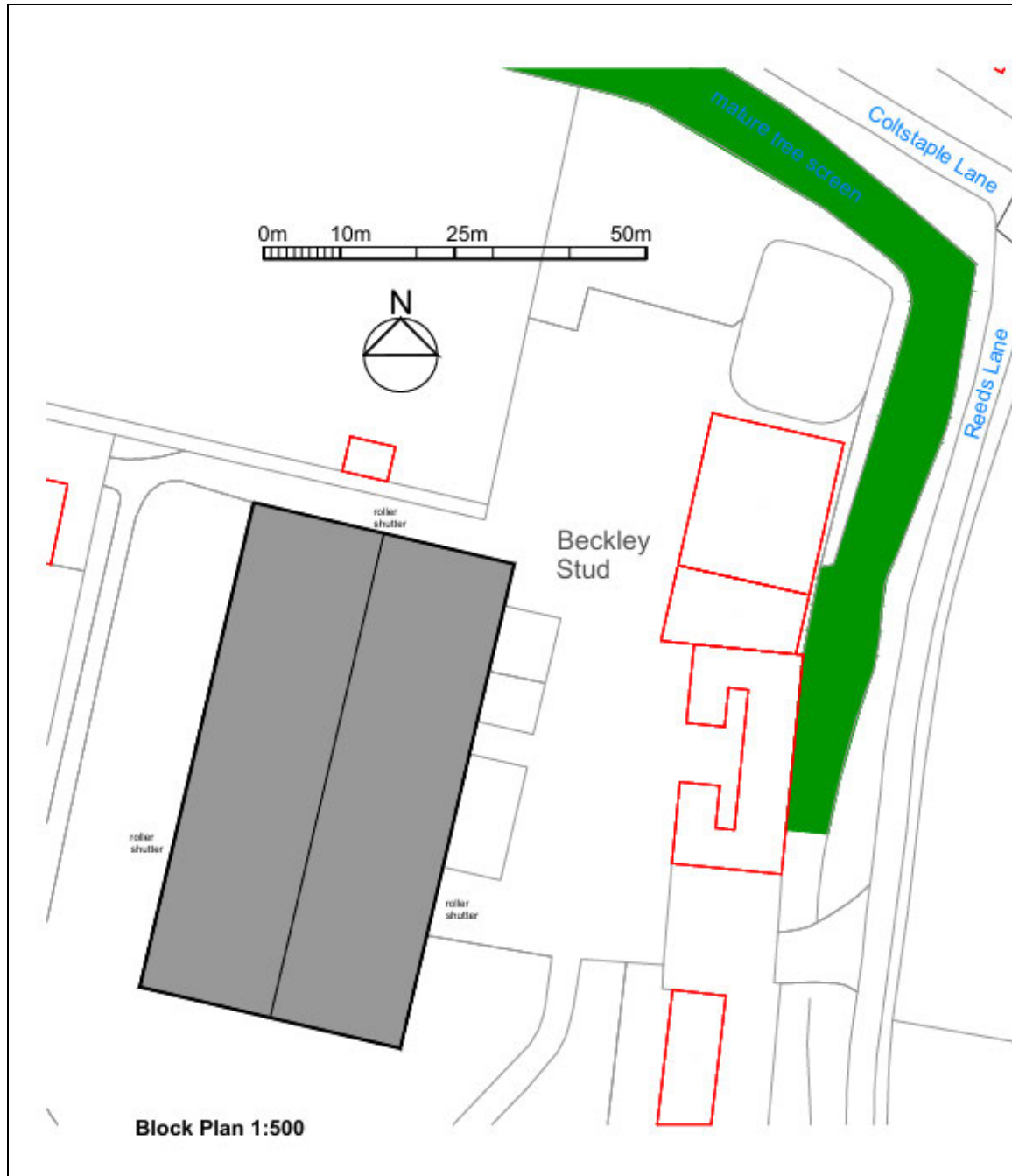


Figure 2 Proposed development outline design.

Relevant Planning Policies and Legislation

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

Horsham District Planning Framework (2015)

- Policy 24: Environmental Protection – Ensures that development does not have an unacceptable impact on the environment.
- Policy 25: The Natural Environment and Landscape Character – Requires the conservation and enhancement of the natural environment and landscape character.
- Policy 26: Strategic Countryside Protection – Protects the countryside from inappropriate development.
- Policy 31: Green Infrastructure and Biodiversity – Promotes the retention, protection, and enhancement of biodiversity and green infrastructure.
- Policy 37: Sustainable Construction – Encourages sustainable design and construction methods that support environmental objectives.

Wildlife and Countryside Act 1981 (as amended)

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

Conservation of Habitats and Species Regulations 2017

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

Environment Act 2021 (Biodiversity Net Gain requirement)

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

The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (SI 2024/47)

The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (SI 2024/47) specify exemptions from mandatory BNG for certain developments where specific criteria are met. Regulation 4 (De Minimis Exemption) provides that the biodiversity gain planning condition does not apply where: (1) the development does not impact an onsite priority habitat (habitats listed under Section 41 of the Natural Environment and Rural Communities Act 2006); AND (2) the development impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres of onsite linear habitat. This exemption is designed to apply proportionality, ensuring that biodiversity net gain is required only where development impacts are material and capable of generating significant ecological effects. Further guidance on the exemption is provided in the DEFRA Planning Practice Guidance on Biodiversity Net Gain (Reference ID 74-004-20240214, Updated August 2024).

Methodology

Desk Study

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

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

Data Sources and Search Areas

Sussex Biodiversity Record Centre (SxBRC)

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

The data request included:

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

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

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

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

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

Field Survey

A survey was conducted on 18 November 2025 to undertake a walkover and assessment in accordance with the CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, completed in the sub-optimal survey period. Surveys were undertaken by suitably qualified ecologists with experience in habitat assessment and protected species evaluation, and in suitable weather conditions to maximise detectability.

Weather during the site walkover on 18 November 2025 was seasonally cool, dry and mostly overcast, with light winds (approximately Beaufort force 2) and air temperatures in the region of 9–12 °C, providing suitable conditions for habitat assessment and field signs detection.

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

Survey methodology included:

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

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

Habitat Impact Quantification and Mapping

Following the field survey and habitat classification, the baseline habitat extent was measured using digital scaled drawings and field survey records. The proposed development footprint (barn and parking area) was overlaid onto the habitat baseline plan to determine areas of habitat to be lost, retained, enhanced, and created. Habitat impacts were quantified in square metres (for area habitats) and metres (for linear features), following the measurement requirements specified in the Statutory Biodiversity Metric User Guide (July 2025).

A parking area of approximately 20 m² will extend the existing yard hardstanding into the secondary modified grassland parcel. The primary grassland parcel (c. 190 m²) will be retained and

incorporated into a long-term habitat management and enhancement scheme. No linear habitats will be impacted.

BNG Exemption Assessment

An assessment was undertaken to determine whether the proposed development meets the criteria for exemption from mandatory Biodiversity Net Gain (BNG), in accordance with the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

- **Habitat Mapping:** Habitats were mapped and classified using UKHab v2.01 to accurately identify habitat types and check for the presence of Priority Habitats (Habitats of Principal Importance).
- **Exemption Criteria:** The extent of habitat loss was calculated to determine if the proposal falls within the 'De Minimis' exemption threshold. This exemption applies where the development does not impact an onsite Priority Habitat and impacts less than:
 - 25m² of non-priority habitat (of non-zero distinctiveness); or
 - 5m of non-priority linear habitat.
- **Assessment Outcome:** Based on the current proposals, the development is confirmed considered likely to meet the De Minimis exemption criteria. Consequently, a full calculation using the Statutory Biodiversity Metric is not required.

Biodiversity Enhancement

Although the development is exempt from the mandatory 10% BNG requirement, the National Planning Policy Framework (NPPF) and Horsham District Council policy still require development to contribute to and enhance the natural and local environment. Proportionate ecological enhancements (e.g., bird/bat boxes, native planting) have been recommended to align with these policy objectives.

Limitations

The ecological assessment was subject to the following limitations:

- **Seasonal Constraints (Sub-optimal Timing):** The walkover survey was undertaken on 18 November 2025, which falls outside the optimal survey season for botanical assessment (typically April to September). Consequently, some annual plant species may have died back, and certain flowering species may not have been identifiable to species level. However, given the nature of the habitats present, the timing allowed for broad habitat classification and the identification of dominant perennial vegetation, enabling a robust assessment of habitat distinctiveness and condition.
- **Single Visit Snapshot:** The assessment is based on a single site visit. Ecological systems are dynamic, and a single visit provides only a snapshot of the site at a specific point in time. It does not account for seasonal fluctuations in species presence or transient use of the site by mobile species (e.g., commuting bats or foraging birds) that may occur at other times of the year.
- **Field Signs Detectability:** While weather conditions were suitable for a walkover survey (dry with good visibility), the detection of certain field signs (e.g., reptile basking, breeding bird activity) is naturally constrained by the late autumn timing. Absence of evidence during this specific survey window does not confirm the absence of a species.

- **Data Shelf Life:** The findings of this report remain valid for a limited period (typically 12–18 months). If development is delayed significantly beyond this timeframe, an updated walkover survey may be required to verify that conditions have not changed.

Despite these limitations, the combination of the field survey, comprehensive desk study, and professional judgement of experienced ecologists is considered sufficient to characterise the site's ecological baseline and determine the likely impacts of the proposed development in accordance with CIEEM guidelines.

Limitations Specific to BNG Assessment

The assessment is proportionate to the scale of the development and the minimal habitat impact identified. The following limitations were noted:

- **Single visit snapshot:** Habitat extent was determined from one walkover survey. Whilst the modified grassland extent is visually obvious and readily mapped, seasonal variations in vegetation extent were not assessed.
- **Parking area design evolution:** The approximately 20 m² habitat loss figure is based on the current block plan design (Drawing DSE/BS/PL/01). Should the final parking area design alter to exceed 25 m² of habitat loss, or should design changes result in impact on priority habitat or linear features, the exemption determination would require reassessment.
- **Priority habitat confidence:** The desk study found no priority habitats within 1 km. The field survey confirmed no Section 41 priority habitats on-site. However, the assessment is based on published data and field observation. Developers will confirm no changes to habitat designations have occurred since survey date (November 2025).

Data validity

Unless otherwise stated, this report will remain valid for a period of 18 months from the date of the last survey. Beyond this date, update works/surveys may be required and following CIEEM's advice note: On the Lifespan of Ecological Reports and Surveys (2019).

Results

Desk Study Results

Designated Sites

Statutory Designations

There are no statutory designated sites present within 2km of the site, as confirmed by SxBRC and the MAGIC Map.

Non-Statutory Designations

There are no Local Wildlife Sites within 1km of the site.

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

There are seven ancient woodland sites within 1km of the site. The closest is Newfoundout Copse which is located 15m east of the entrance to the site.

Priority Habitats and Species Records

Within 500 m of the site, the following Section 41 priority habitats are present: lowland mixed deciduous woodland (with several woodland blocks recorded within 1 km), hedgerows forming local field boundaries, and ponds, including two within approximately 250 m, the nearest of which is a garden pond about 100 m to the east.

The desk study revealed a number of protected and notable species records within 1 km of the site. Three bat species have been recorded in the vicinity: noctule (*Nyctalus noctula*), brown long-eared bat (*Plecotus auritus*), and common pipistrelle (*Pipistrellus pipistrellus*). A single great crested newt (*Triturus cristatus*) record was noted approximately 245 m north-west of the site, associated with Horsham Golf Course. Three hazel dormouse (*Muscardinus avellanarius*) records were reported within 1 km of the site, with the closest records located approximately 400 m west. Several records of hedgehog (*Erinaceus europaeus*) were also retrieved, indicating the species' presence in the wider landscape.

The desk study records include 32 bird species documented within the search area surrounding the site. Notable species include skylark (*Alauda arvensis*), kestrel (*Falco tinnunculus*), great spotted woodpecker (*Dendrocopos major*), and green woodpecker (*Picus viridis*), all Section 41 priority species. Additional records include common breeding and wintering species such as blackbird (*Turdus merula*), robin (*Erithacus rubecula*), great tit (*Parus major*), blue tit (*Cyanistes caeruleus*), and chaffinch (*Fringilla coelebs*). Wildfowl including mallard (*Anas platyrhynchos*), tufted duck (*Aythya fuligula*), and moorhen (*Gallinula chloropus*) are recorded, consistent with the presence of two ponds within approximately 250 m of the site, the nearest being a garden pond approximately 100 m to the east. Species including swallow (*Hirundo rustica*), house martin (*Delichon urbicum*), and house sparrow (*Passer domesticus*) indicate the presence of human structures and potential nest sites in the local landscape..

Field Survey Results

Habitats

There were three distinct habitats recorded across the site, a habitat map showing the location and distribution of habitats is provided in Appendix 1. Table 2 provides a summary of the habitats found across the site, a description and justification for the habitat classification according to UKHab, the habitat condition, total area in hectares (ha) and where applicable species lists are provided.

Table 1 UKHab habitat descriptions for the site including defining species compositions.

Habitat Type (UKHab Code)	Area (ha)	Condition	Habitat Photo	Description/ Justification	Plant Species
Habitats within application boundary					
Modified grassland	0.021	Poor		Intensively managed equestrian pasture. Dominated by fast-growing productive grasses, typical of heavily grazed and maintained fields on fertile soils. Low botanical diversity reflecting high management intensity and nutrient enrichment from equestrian use. Sward comprises predominantly rye grass species with white clover colonisation. Species composition reflects disturbance from trampling, poaching, and regular maintenance. Small secondary grassland parcel within the site boundary. Similarly managed to the primary grassland polygon, with identical condition and species composition reflecting the same equestrian management regime. Low botanical diversity and high nutrient status.	Perennial rye-grass (<i>Lolium perenne</i>), White clover (<i>Trifolium repens</i>), Cock's-foot (<i>Dactylis glomerata</i>), Meadow fescue (<i>Festuca pratensis</i>), Common ruderal species. Ornamental olive tree also present.
Artificial Unvegetated, Unsealed Surface (u1c)	0.007	N/A		Raised bed planters and associated bare soil/mulch areas created for horticulture and amenity purposes. Unsealed substrate with minimal persistent vegetation. Surface comprises exposed soil, compost, and wood chip mulch with occasional volunteer plant colonisation.	Occasional pioneer species and volunteer plants; substrate preparation inhibits establishment of persistent vegetation

Habitat Type (UKHab Code)	Area (ha)	Condition	Habitat Photo	Description/ Justification	Plant Species
Developed Land: Sealed Surface (u1b)	0.440	N/A		Operational built environment comprising storage containers, buildings, sealed hardstanding, access roads, and infrastructure associated with equestrian facility use.	No vascular plants; substrate sealed or disturbed

Protected and Priority Species

[REDACTED]

[REDACTED]

Bats

The on-site habitats provide limited suitability for bats. The modified grassland is intensively managed equestrian pasture with poor botanical diversity and low invertebrate abundance, offering poor foraging conditions. Sealed and developed surfaces (0.447 ha) provide no suitable foraging or roosting habitat. No trees or structures with bat roost features were identified; on-site buildings are operational and subject to regular disturbance. Newfoundout Copse ancient woodland (15 m east) is likely to support local bat populations, but the site itself lacks commuting features such as hedgerows or other linear habitats.

Birds

Desk study records include Section 41 priority bird species within 1 km, such as skylark *Alauda arvensis*, kestrel *Falco tinnunculus* and green woodpecker *Picus viridis*. The modified grassland is short, uniform and lacks the tall, structurally diverse sward required by ground-nesting species such as skylark, and there are no mature trees or rough grassland suitable for hunting raptors. Ornamental olive trees present on site lack cavities suitable for typical UK breeding species, and no standing water is present to support wildfowl, despite records associated with ponds in the wider landscape.

Habitats such as ornamental and native hedgerows, grasslands and woodland outside of the redline boundary are suitable for nesting and foraging.

Hazel Dormouse

Hazel dormouse records approximately 400 m west indicate the species occurs locally. Dormice require woodland or scrub with a well-developed understorey (typically 5–10 m tall) and a diverse shrub layer including food plants such as hazel and hawthorn. The site supports open, short modified grassland with no trees or shrubs, and is separated from Newfoundout Copse (15 m east) by the access and lacks any connecting hedgerow or scrub.

Great Crested Newt and Other Amphibians

Two ponds are present within approximately 250 m of the site (nearest pond approximately 100 m east), and a single great crested newt record occurs at Horsham Golf Course (245 m north-west). No ponds or standing water occur on-site. The modified grassland is intensively managed, with limited refugia, cover or hibernation features, and sealed/developed surfaces offer no amphibian habitat.

Reptiles

No reptile records were returned in the desk study. The modified grassland is closely grazed and heavily compacted, lacking tussock-forming grasses, rough margins, leaf litter or log piles, and is therefore of low suitability for common reptile species such as slow-worm and grass snake. Sealed and developed surfaces provide no reptile habitat.

Hedgehog

Desk study records confirm hedgehog presence in the wider area. On-site modified grassland is intensively managed with low structural diversity and limited opportunities for nesting or shelter, and there is an absence of scrub, hedgerow, leaf litter or log piles. There is no hedgerow habitat on-site that would facilitate regular hedgehog movement.

Water Voles and Otters

No waterbodies or linear aquatic habitats occur within the site. The desk study returned no records of water vole or otter within the search area. No suitable habitat for these species is present on-site.

Biodiversity Net Gain (BNG) Exemption

BNG Exemption Assessment

Statutory Regulatory Framework: An assessment was undertaken to determine whether the proposed development qualifies for exemption from mandatory Biodiversity Net Gain requirements, in accordance with Regulation 4 (De Minimis) of The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (SI 2024/47) and the DEFRA Planning Practice Guidance on Biodiversity Net Gain (Reference ID 74-004-20240214, Updated August 2024).

Exemption Assessment Methodology:

Habitat mapping and classification: All onsite habitats were mapped during the field survey (18 November 2025) and classified to UKHab v2.01 classification system. Habitat parcels were identified and recorded with specific reference to biodiversity value (zero vs. greater than zero).

Priority habitat screening: Desktop searches of statutory data sources (MAGIC Map, Sussex Biodiversity Record Centre) confirmed the absence of priority habitats listed under Section 41 of the Natural Environment and Rural Communities Act 2006 within the site boundary. This conclusion was validated by the field survey.

Habitat impact quantification: The footprint of the proposed storage barn and associated parking area was assessed against baseline habitat distribution maps. Areas of habitat to be lost, retained, enhanced, and created were quantified in square metres (for area habitats) and metres (for linear habitats).

Exemption criteria testing: The quantified impacts were tested against the two statutory conditions specified in Regulation 4:

- Condition 1: Development does not impact an onsite priority habitat ✓
- Condition 2: Development impacts less than 25 m² of onsite habitat with biodiversity value greater than zero AND less than 5 m of onsite linear habitat ✓

Conclusion: Based on this proportionate assessment, the proposal qualifies for de minimis exemption, and no statutory biodiversity metric calculation is required for planning submission.

Biodiversity Enhancement

Although the development is exempt from the mandatory 10% BNG requirement under SI 2024/47 Regulation 4, the National Planning Policy Framework (NPPF 2024, Paragraph 99) and Horsham District Council Policy 31 (Green Infrastructure and Biodiversity) still require development to contribute to and enhance the natural and local environment. Proportionate ecological enhancements have been recommended to align with these policy objectives and are detailed in Section 4: Ecological Constraints and Opportunities.

Ecological Constraints and Opportunities

Constraints

Designated Habitats and Priority Habitats and Species

There are no statutory designated sites present within 2km of the site. However, seven ancient woodland sites lie within 1km, with Newfoundout Copse located just 15m east of the site entrance. Ancient woodland is irreplaceable habitat and represents a significant constraint to development. While not directly impacted by the development footprint, proximity to ancient woodland requires careful consideration to avoid indirect effects during construction, such as dust deposition, changes to hydrology, or root damage.

Within 500m, Section 41 priority habitats include lowland mixed deciduous woodland, hedgerows, and ponds (nearest approximately 100m east). Although these habitats are off-site, their proximity creates constraints relating to potential indirect impacts from construction activities, lighting, and operational phases.

The on-site habitats comprise modified grassland (poor condition, 0.021 ha), artificial unvegetated unsealed surface (0.007 ha), and developed sealed surface (0.440 ha). These habitats are of low distinctiveness and do not constitute priority habitats under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

Bats

The desk study identified three bat species in the vicinity: noctule, brown long-eared bat, and common pipistrelle. However, the site provides limited suitability for bats. The modified grassland is intensively managed with poor botanical diversity and low insect availability, providing poor foraging habitat. No trees or structures with potential roost features were identified on-site, and the operational buildings experience regular disturbance unsuitable for roosting.

While Newfoundout Copse (15m east) likely supports local bat populations, the site lacks commuting habitat such as hedgerows or linear features. The constraint relates primarily to the need to minimize artificial lighting during construction to avoid impacts on bat populations using adjacent habitats.

Birds

The desk study identified Section 41 priority bird species within 1km, including skylark, kestrel, green woodpecker, and great spotted woodpecker. However, the on-site modified grassland is unsuitable for ground-nesting species, which require tall, structurally diverse vegetation. The ornamental olive tree is isolated and surrounded by disturbance so is unlikely to be used by nesting birds.

Adjacent habitats offer suitable nesting habitat which present a potential constraint during site clearance and construction.

The primary constraint is the legal requirement to avoid vegetation clearance during the breeding season (March–August inclusive) to comply with the Wildlife and Countryside Act 1981. If clearance during the breeding season is unavoidable, supervision by a qualified ecologist is required.

Dormice

Hazel dormouse records approximately 400m west indicate local population presence. Dormice require mid-height woodland (5–10m tall) with well-developed understorey, dense shrub layers,

and food resources such as hazel and hawthorn. The on-site modified grassland lacks woodland or scrubby vegetation and comprises open, short grassland with no trees or shrubs.

Ornamental hedgerows outside of the redline boundary are unlikely to offer suitable habitat for dormice, these hedgerows are disconnected to more suitable habitat in the landscape and provide limited foraging habitat.

While Newfoundout Copse (15m east) may provide suitable habitat, the site is isolated from this resource with no connecting hedgerow or scrub. The constraint is minimal given the absence of suitable habitat on-site, though awareness of the species' presence locally is required to ensure development does not fragment or sever ecological corridors.

Great Crested Newt

Two ponds are present within approximately 250m (nearest garden pond 100m east), and a single GCN record was documented at Horsham Golf Course (245m north-west). However, no ponds or standing water are present on-site. The modified grassland provides low-quality terrestrial habitat with limited shelter, refugia, or hibernation opportunities due to intensive management and regular disturbance.

The constraint is minimal on-site, but if construction works occur within 250m of identified ponds involving soil disturbance, habitat removal, or hydrological changes, further assessment and mitigation may be required. This could include pre-construction surveys or adherence to reasonable avoidance measures to prevent incidental harm.

Invertebrates

No desk study records of notable invertebrates were identified. The on-site modified grassland is intensively managed with low botanical diversity, providing poor habitat for invertebrates. The absence of diverse flowering plants, tussocky grassland, deadwood, or other structural features limits invertebrate assemblages.

Given the low ecological value of the on-site habitats and the small area affected (approximately 20m²), invertebrates do not represent a significant constraint to the development.

Invasive Non-Native Species

No invasive non-native species were recorded on-site during the field survey. This absence removes a potential constraint, as the presence of species such as Japanese knotweed, Himalayan balsam, or giant hogweed would require management under the Wildlife and Countryside Act 1981 (as amended) to prevent spread.

However, vigilance is required during construction to prevent the introduction or spread of invasive species through contaminated soil, plant material, or machinery. Biosecurity measures will be implemented as a precautionary approach.

Reptiles

No desk study records of reptiles were identified. The on-site modified grassland provides poor quality reptile habitat, comprising intensively managed, uniform, short-sward pasture with high compaction and limited structural diversity. The lack of tussock-forming grasses, tall vegetation, leaf litter accumulation, or log piles substantially reduces suitability for species such as slow-worms and grass snakes.

Given the absence of suitable habitat and no records in the local area, reptiles do not represent a constraint to the development. The sealed and developed surfaces provide no reptile habitat

Opportunities

Although the development qualifies for de minimis exemption from the mandatory 10% biodiversity net gain requirement, Paragraph 99 of the National Planning Policy Framework (2024) and Policy 31 (Green Infrastructure and Biodiversity) of the Horsham District Planning Framework (2015) require that all development contribute positively to and enhance the natural and local environment.

Accordingly, the following proportionate enhancement measures could be implemented for the Proposed Development.

On-site Habitat Retention and Management

Grassland habitat retention: The majority of the modified grassland (190 m² of 210 m² baseline) will be retained and managed as equestrian grazing habitat. This represents approximately 90% habitat retention and ensures landscape continuity.

Grassland enhancement: The retained grassland parcel will be managed to support habitat recovery.

Management recommendations:

- Reduction in fertilizer application to transition toward moderate-distinctiveness grassland over 3–5 years
- Introduction of native wildflower seed mix (composition to be agreed with ecological supervisor pre-works) to increase botanical diversity
- Maintenance of current grazing regime to support sward structure

Protection of Habitat and Features

A native tree/shrub belt along the northern boundary of the development will be enhanced and/or established to screen the storage barn and provide foraging and nesting habitat for breeding birds and bats (in accordance with species assessment above and future bat-sensitive lighting design).

Bat-friendly design

All external lighting to the storage barn will be designed in accordance with Bat Conservation Trust guidance, specifically:

- Warm white LED fittings (2700K colour temperature maximum)
- Motion sensors to minimise duration of operation
- Downward-directed fittings only, angled to avoid light spill onto boundary vegetation
- No lighting on the western and northern elevations adjacent to Newfoundland Copse ancient woodland

Breeding bird habitat creation

Installation of bat boxes (minimum 3 no., specifications below) and bird nest boxes (minimum 4 no., including house martin/swift cups and open nest trays) to offset loss of established features and provide compensation for habitat loss.

Hole-entrance boxes (25mm for house sparrow, blue tit, great tit), open-nest trays (for robin, blackbird), and swift cups (for swifts and house martin), mounted 2–5 m high on buildings or new tree planting

Increase Bat Roost Availability

Integrated bat brick (e.g., Habibat or equivalent) or external mounted wooden bat box, positioned 2–4 m high on building facade, facing south-east to south, away from prevailing winds

These measures ensure compliance with NPPF Paragraph 99 (minimizing impacts and providing net gains for biodiversity) and Horsham District Policy 31 (enhancement of biodiversity and green infrastructure), despite the formal exemption from mandatory metric-based net gain assessment.

Mitigation Hierarchy

Avoidance

Timing of Vegetation Clearance: Vegetation clearance will be undertaken outside the bird breeding season (March–August inclusive) to avoid impacts on nesting birds protected under the Wildlife and Countryside Act 1981. This represents the primary avoidance measure and is a legal requirement.

Protection of Adjacent Habitats: Newfoundout Copse (15m east) must be protected from indirect impacts during construction.

Avoidance of Hydrological Impacts: The development will avoid altering groundwater levels or surface water runoff patterns that could affect nearby ponds (100m and 250m distant) or wetland habitats. Sustainable drainage design will ensure no increase in polluted runoff to adjacent habitats.

Minimisation

Sensitive Lighting Design: Artificial lighting during construction and operation will be minimized to reduce impacts on nocturnal species (bats, hedgehogs, invertebrates) using adjacent habitats, particularly Newfoundout Copse. Lighting specifications should follow Bat Conservation Trust and Institution of Lighting Professionals guidance, including:

- Limiting lux levels to <0.5 lux at sensitive habitat boundaries
- Using warm white LED lighting (below 2700 Kelvin)
- Directing lighting downwards with horizontal cut-off luminaires
- Installing motion sensors and timers to minimize lighting duration

Compensation:

Given the low ecological value of habitats affected (modified grassland, ornamental planting, and sealed surfaces) and the small area impacted (approximately 20m² with biodiversity value >0), the development qualifies for exemption under Regulation 4 (de minimis) of The Biodiversity Gain Requirements (Exemptions) Regulations 2024 [SI 2024/47]. Therefore, mandatory biodiversity net gain and associated compensation requirements are not applicable

Enhancement:

Native Planting: Incorporation of native tree, shrub, and hedgerow planting using locally appropriate species (e.g., hazel, hawthorn, blackthorn, field maple, oak) would provide foraging, commuting, and nesting opportunities for bats, birds, invertebrates, and hedgehogs. Planting should prioritize species of benefit to wildlife and align with local landscape character.

Wildflower Grassland: Areas of amenity grassland could be sown with native wildflower mixes appropriate to local soil conditions, providing foraging resources for pollinators and invertebrates. Management should involve reduced mowing frequency (e.g., annual cut in late summer) to allow flowering and seed set.

Habitat Features for Wildlife: Incorporation of specific habitat features would enhance biodiversity, including:

- Bird nest boxes (minimum 6 boxes suitable for common species)
- Integrated bat roosting features (e.g., bat bricks, bat tubes)
- Log piles for invertebrates, amphibians, and hedgehogs
- Dead wood habitat (standing or fallen)
- Rubble piles for invertebrates and reptiles

Green Roofs and Walls: Installation of biodiverse green roofs (Sedum or wildflower roofs) and green walls would provide additional habitat for invertebrates and birds while delivering sustainable drainage and thermal benefits. These features can contribute to biodiversity net gain and support delivery of local green infrastructure strategies.

Sustainable Drainage Features: SuDS features planted with native wetland vegetation (e.g., swales, attenuation basins) would provide habitat for invertebrates, amphibians, and wetland-associated birds while delivering water quality and flood risk benefits. Planting should avoid introduction of invasive non-native species (e.g., *Crassula helmsii*, *Azolla filiculoides*).

Further Survey Recommendations

No further ecological surveys are required to inform the determination of this planning application.

This conclusion is consistent with BS 42020:2013 and CIEEM Guidelines (2017), based on the following proportionate assessment:

- **Absence of Suitable Habitat:** The Preliminary Ecological Appraisal (PEA) confirmed the site comprises intensively managed, modified grassland and sealed surfaces of negligible ecological value. It lacks the structural complexity, connectivity, or specific features (such as ponds, roosting crevices, or diverse vegetation) required to support protected species such as bats, [REDACTED] hazel dormice, reptiles, or great crested newts.
- **De Minimis Impact:** The development footprint affects approximately 20m² of low-distinctiveness habitat. This falls below the 25m² de minimis threshold for statutory Biodiversity Net Gain, indicating an impact magnitude so low that significant effects on local ecological networks are objectively unlikely.
- **Sufficiency of Information:** The desk study and field survey provide a robust baseline. The risk of protected species presence is demonstrably low, meaning further survey data would not alter the assessment of impacts or the design of the mitigation strategy.
- **Management via Mitigation:** Any residual low-level risks (e.g., to nesting birds or hedgehogs) can be fully addressed through standard precautionary working methods (e.g., timing of works, sensitive lighting) secured via planning condition, rather than requiring pre-determination surveys.

Consequently, the application can be determined on the current information, provided the mitigation and enhancement measures outlined in this report are implemented.

References

British Standard BS 42020:2013. Biodiversity – Code of practice for planning and development. BSI Standards.

British Trust for Ornithology (BTO). (2021). Birds of Conservation Concern 5. Eaton, M. A., Balmer, D. E., Coombes, R. H., et al.

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

CIEEM. (2017). Guidelines for Preliminary Ecological Appraisal (2nd Edition). Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM. (2025). Health & Safety Guidance for Field Surveys. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM. (2022). Guidelines for Ecological Impact Assessment in the UK and Ireland. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM. (2019). Advice Note. On the lifespan of ecological reports and surveys. Chartered Institute of Ecology and Environmental Management, Winchester.

Coreo. (2025). Coreo ecological data collection app [Mobile application software]. Natural Aptitude Ltd. Available from: <https://coreo.io/>

DEFRA. (2024). Biodiversity Metric 4.0: Technical Supplement. Department for Environment, Food and Rural Affairs.

Environment Act 2021 (and subsequent amendments). UK Legislation. [Available online]

Froglife. (2021). Reptile Survey Guidelines. Froglife Trust.

GOV.UK. (2025). Protected species and development: advice for local planning authorities. UK Government Digital Service. Available from: <https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications>

JNCC. (2024). UK BAP Priority Species and Habitats List. Joint Nature Conservation Committee.

Natural England. (2025). Dormouse Conservation Handbook (latest edition). Peterborough: Natural England.

Natural England. (2025). Species Survey and Mitigation Guidelines. Peterborough: Natural England.

Natural England. (2024). Great Crested Newt eDNA Sampling Protocol. Peterborough: Natural England.

NatureSpace. (2025). District Level Licensing Guidance and Application Process. NatureSpace.

UK Habitat Classification Working Group. (2024). UKHab Technical Handbook. JNCC, UK Habitat Classification System.

Appendix 1 – Habitat Map – UKHab/BNG

