The Ecology Co-op
ENVIRONMENTAL CONSULTANTS
Unit 4, Langham Stables, Langham Lane, Lodsworth, Petworth, West Sussex, GU28 9BU.

Tel: 01798 861 800 - E-Mail: info@ecologyco-op.co.uk - Web: www.ecologyco-op.co.uk

Preliminary Ecological Appraisal

Site Name

Lock House - Site A,

Partridge Green

Client

Mr Nicholas Sutton

Issue Date

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Author

Alice Motola

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The Ecology Co-operation Ltd
Registered Office: Unit 4, Langham Stables, Langham Lane, Lodsworth, West Sussex, GU28 9BU
Company number: 8905527



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Original	**Alice Motola** BSc, MSc (Hons), QCIEEM	**Kate Priestman** MCIEEM, CEnv	04.11.26	N/A	

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About the Author

This report has been prepared by Alice Motola who has over two years of professional consultancy experience and is adequately trained to carry out UKHab Surveys. Alice Motola is also registered to use the Level 1 Class Licence to survey great crested newts, a MoRPh river accredited surveyor and a Qualifying Member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

About the Reviewer

This report has been reviewed by Kate Priestman, who is a Principal Ecologist with over twenty years' experience. Kate has undertaken extensive survey work and reporting, encompassing a breadth of deliverables, and prepared European Protected Species licences for numerous schemes. As a Full member of CIEEM and a Chartered Environmentalist (CEnv), she is bound by CIEEM's code of professional conduct.

Report Summary

Purpose	The Ecology Co-op was commissioned by Mr Nicholas Sutton to undertake a Preliminary Ecological Appraisal of Lock House – Site A, Patridge Green, further to a proposal for a new build coach house to be used as a holiday let, provision of four parking spaces comprising a grasscrete surface, and creation of a thorny bush buffer between the new building and an adjacent ancient woodland.
Context	The site comprises mainly of short, modified grassland and developed land; sealed surface habitat. The site area to be developed measures approximately 0.025ha and is situated west of Partridge Green village. The land is surrounded by agricultural fields to the north and to the east and by Ancient Woodland & Deciduous Woodland priority habitat to the northwest and west.
Key findings	The closest pond to the site was found to be dry during the survey visit. Two trees (T9 and T11), within the line of trees north of the site both contained potential roost features (PRFs) for bats and were assessed as having PRF-M classification (suitability to support multiple bats).
Recommendations	No further surveys for any protected species are required in order for the proposed development to proceed, provided that trees T9 and T11 with PRF-M classification are not removed, as recommended within the Arboricultural Impact Assessment report. However, should the plans change and include any tree works which would impact T9 and T11, further surveys will be required to assess the likely presence/absence of bats therein. No Priority Habitats were located within or immediately adjacent to the main footprint of the proposed development site or will be lost as part of the proposed works. The development total area is below the 0.2ha threshold, and no onsite or adjacent priority habitats will be negatively impacted, therefore the proposed development will not require a biodiversity net gain assessment. Any vegetation removal should be undertaken outside of the nesting bird season (typically 1st March to 31st August). The mitigation measures outlined in this report for great crested newts during the construction phase of the development, should be followed in full. As the site may be used by foraging and commuting bats, it is important that the potential for disturbance from artificial lights is considered. The proposed development is likely to require an 'ecologically sensitive lighting scheme' in accordance with guidance produced by the Bat Conservation Trust.
Are further surveys required?	No. (Should the plans change and include any tree works which would impact T9 and T11, further surveys will be required to assess the likely presence/absence of bats therein.)

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1 INTRODUCTION

1.1 Purpose of the Report

The Ecology Co-op has been commissioned to undertake a Preliminary Ecological Appraisal (PEA) of land at Lock House – Site A, Patridge Green by Mr Nicholas Sutton. This report presents the findings of a walkover survey undertaken by Alice Motola, BSc, MSc (Hons), Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM), Level 1 great crested newt licence holder and MoRPh river accredited surveyor, on the 20th of October 2026. It provides details on the potential for any protected/notable species and/or habitats to be present at the site and a simple assessment of the potential ecological constraints and opportunities in relation to a proposal for a new build coach house to be used as a holiday let, provision of four parking spaces comprising a grasscrete surface and creation of a thorny bush buffer at the boundary between the new building and an adjacent ancient woodland. Recommendations for further surveys that are likely to be required to inform a planning application and Ecological Impact Assessment (EcIA) of the proposal are provided where necessary, and possible measures to avoid, mitigate and/or compensate for significant adverse effects are summarised. The potential to incorporate ecological enhancement measures as part of the scheme is discussed, in addition to any requirement to achieve biodiversity net gain.

This PEA report is designed to inform the client and their team (as appropriate) about the initial findings of the site walkover and desk study research in relation to the site proposals, highlighting the key ecological constraints and opportunities, and any further survey requirements.

1.2 Background

The site is located at Lock House, Site A, Lock Lane, Partridge Green RH13 8EG. The central National Grid Reference for this site is TQ 17722 18953. The location of the site is shown in Figure 1.

The site comprises mainly of short, modified grassland and developed land; sealed surface habitat. The site area which is to be developed measures approximately 0.025ha and is situated west of Partridge Green village. The land is surrounded by agricultural fields to the north and to the east and by Ancient Woodland & Deciduous Woodland priority habitat to the northwest and west. A public footpath is located only 10m north of the proposed new holiday cottage and the (non-priority) River Adur flows 0.19km northeast of the development. Historical imagery sourced from Google Earth Pro of the site shows that the main footprint of the development has been managed as short grassland since 2009, demonstrating that there have been no significant land-use changes to or loss of habitat within the development area. However, changes to the adjacent Ancient Woodland tree cover density and woodland edge line seem to have occurred in the last four years whereby new open areas within the woodland have started to appear and the woodland edge has started to gradually recede, direction northwest and varied from being only approximately 4–5 m distant from the proposed new holiday cottage building to approximately 90 m northwest. The landowner reports the changes being due mainly to ash dieback.

The proposed development/project includes a proposal for a new two-storey build coach house to be used as a holiday let, provision of four parking spaces comprising of a grasscrete surface and creation of a thorny bush buffer between the new building and an ancient woodland. The proposed plan is shown in Figure 2.

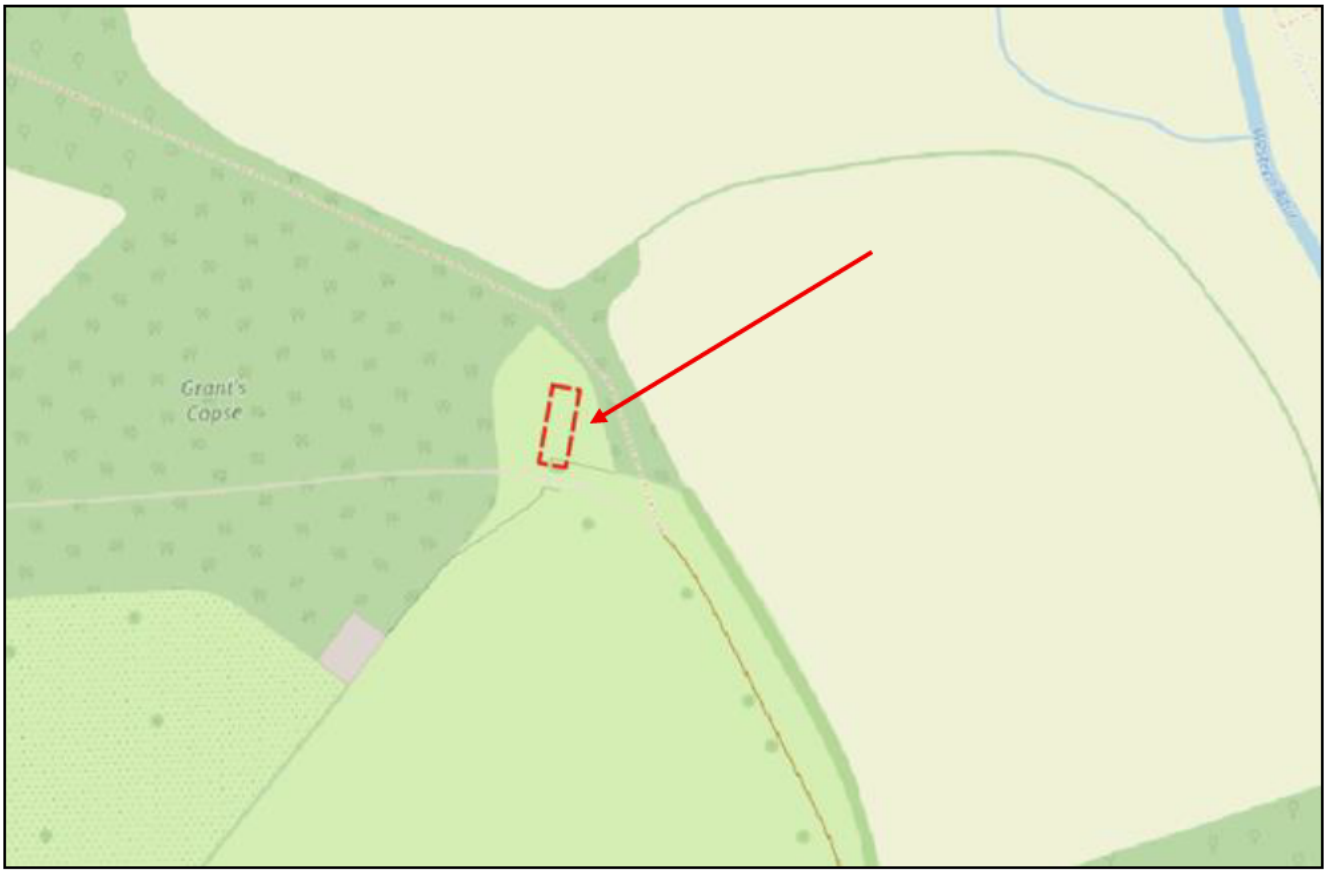

Figure 1. An aerial OSM Standard Baseline Map showing the location of the site. The approximate proposed building outline is outlined in a dashed red line and indicated with a red arrow. Image produced courtesy of QGIS mapping software version 3.44 Solothurn long term release (© 2025). Cartographer name: Alice Motola.

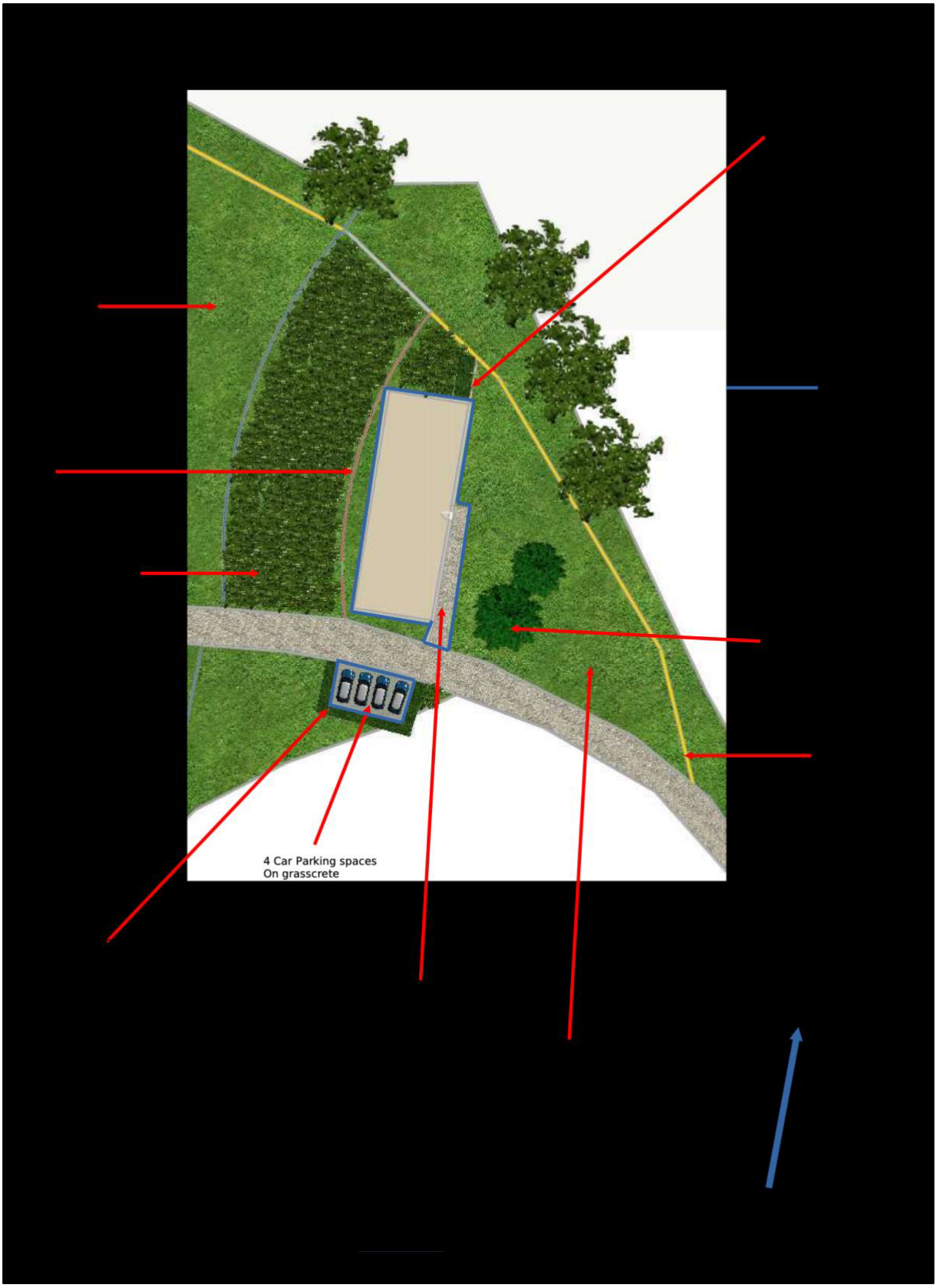

Figure 2. Proposed plan provided by client for the Preliminary Ecological Appraisal.

1.3 Policy and Legislation

Legal protection applying to relevant bird, mammal, herpetofauna, invertebrate species and flora, and current nature conservation planning policy is outlined in Appendix 1 of this report.

Where possible, this report provides guidance on how the proposal can be designed to meet the requirements of both local planning policy and the National Planning Policy Framework (NPPF). Details of the NPPF can be found in Appendix 1 and relevant local planning policy by Horsham District Council is provided in Appendix 2.

2 METHODOLOGY

The methodologies used for this survey are in accordance with the Guidelines for Preliminary Ecological Appraisal[1], but also consider the Guidelines for Ecological Report Writing, Second Edition[2].

2.1 Desk Study

A search for existing records of protected species, species of conservation concern and invasive non-native species was requested from the Sussex Biodiversity Records Centre (SxBRC), within a radius of 1km of the site.

A search of online mapping resources was undertaken to identify the location of any features of potential ecological interest including ponds within 500m (relevant to great crested newts *Triturus cristatus*), watercourses (relevant to riparian mammals and crayfish) and connectivity to woodland, scrub, and hedgerow networks (relevant to bats and dormice *Muscardinus avellanarius*) in the wider landscape around the site. The connectivity of the site to these features, buildings and other semi-natural habitats, such as grassland and heathland, are also relevant to great crested newts, reptiles and a wide variety of notable species of conservation concern.

The MAGIC website resource (www.magic.gov.uk) was used to identify the location of designated sites for nature conservation and European Protected Species (EPS) licences granted in relation to the survey site.

2.2 Field Survey

A site walkover survey was undertaken on the 20th of October 2026, during which the habitats contained within the site were described and evaluated. The site is relatively small in scale and contains limited semi-natural habitat diversity. All habitat types contained within the site, together with the dominant botanical species and indicators of important habitat types, such as ancient woodland or unimproved grassland, have simply been listed and described where identified.

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[1] CIEEM (2017). *Guidelines for Preliminary Ecological Appraisal, 2nd edition.* Chartered Institute of Ecology and Environmental Management, Winchester.
[2] CIEEM (2017). *Guidelines for Ecological Report Writing, 2nd edition.* Chartered Institute of Ecology and Environmental Management, Winchester.

Habitats and features at the site were evaluated for their potential to support legally protected species and/or species of conservation interest. In addition, observations of any important plant communities, bird assemblages or other potentially valuable ecological features were recorded.

Details of the preliminary survey methods for each legally protected species are given below. Any site-specific limitations to the survey, e.g. access constraints or seasonal constraints, are set out in section 3.11.

[redacted]

2.4 Bats

Bats can use a wide range of features for roosting purposes, including loft spaces, cavity walls, loose tiles, mortice joints and cracks/gaps in a variety of built structures. They can also be found in trees with holes, splits, cracks, cavities, ivy and loose bark.

Trees, buildings and other structures were broadly assessed for their potential to support roosting bats and further surveys are recommended as appropriate.

The habitats surrounding the site and wider landscape were broadly assessed for their potential to support foraging and commuting bats. Further surveys have been recommended as appropriate.

2.5 Breeding Birds

Birds can use a wide range of natural and artificial habitats when breeding, including trees, hedgerows, fields, houses and garden sheds. The habitats contained within the site and adjacent areas were broadly assessed for their potential to support important bird species/assemblages, and breeding birds. Any birds identified during the site visit were recorded. Special attention was paid to notable species such as red-listed Birds of Conservation Concern[3] and those species afforded special protection on Schedule 1 of the Wildlife and Countryside Act (1981). Further surveys have been recommended as appropriate.

[3] Stanbury, A., Eaton, M., Aebischer, N., Balmer, N., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. (2021). Birds of Conservation Concern 5: the status of bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man. British Birds 114, pp 723-747.

2.6 Dormice

Dormice are found in deciduous woodland and hedgerows, feeding on flowers, pollen, fruits, insects and nuts, favouring hazel *Corylus avellana* and honeysuckle *Lonicera periclymenum* for food and as bedding. The site was broadly assessed for its potential to support dormice. This included use of on-line mapping resources to assess the surrounding area for connectivity to large blocks of woodland, scrub and extensive hedgerow networks.

Further surveys are recommended as appropriate in accordance with best practice guidance[4].

2.7 Great Crested Newt

Great crested newts breed in ponds during the spring and spend the rest of the year feeding on invertebrates primarily in semi-natural habitats including woodland, hedgerows, marshes and tussocky grassland. A desk study was undertaken to identify ponds and wet ditches within 500m of the site that might support breeding great crested newts. Where access permission was granted, or ponds could be viewed from public roads or footpaths, the ponds were assessed for their potential to support great crested newts using the Habitat Suitability Index (HSI) (Oldham et al 2000)[5]. The value of the site for terrestrially foraging great crested newts and any features that might be used by hibernating newts has also been assessed.

Further surveys are recommended as appropriate, in accordance with best practice guidance (English Nature 2001)[6].

2.8 Reptiles

The common lizard *Zootoca vivipara*, slow-worm *Anguis fragilis,* grass snake *Natrix helvetica* and adder *Vipera berus* are widespread species that can be found in any of these habitats, whereas smooth snake *Coronella austriaca* and sand lizard *Lacerta agilis* have much more restricted and isolated populations on lowland heathland and sand dunes.

Habitats on the site were broadly assessed for their potential to support reptiles. Particular attention was paid to those features that provide suitable basking areas (e.g. south-facing slopes), hibernation sites (e.g. banks, walls, piles of rotting vegetation) and opportunities for foraging (rough grassland and scrub). Further surveys are recommended as appropriate.

Any existing refugia (e.g. logs) were searched for presence of reptiles and any observations of reptiles recorded.

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[4] Bright, P., Morris, P. and Mitchell-Jones, T. (2006). *The dormouse conservation handbook 2nd Ed.* English Nature, Peterborough.
[5] Oldham, R.S., Keeble, J., Swan, M.J.S. and Jeffcote, M. (2000). Evaluating the suitability of habitat for the great crested newt (*Triturus cristatus*). *Herpetological Journal* 10, 143-155.
[6] English Nature (2001). *Great Crested Newt Mitigation Guidelines*. English Nature, Peterborough.

2.9 Riparian Wildlife

Any watercourses identified during the desk study or field survey were assessed for their suitability to support otter *Lutra lutra*, water vole *Arvicola amphibius* and American mink *Neovison vison*. Suitable habitat includes grassy banks along slow-moving rivers, ditches, streams, lakes, ponds, canals, as well as marshland and upland. Field signs include faeces, latrines, feeding stations, burrows, footprints and runs or pathways. Further surveys are recommended as appropriate.

2.10 Invasive Non-native Species

No specific surveys for invasive non-native species (INNS) were undertaken. However, the presence of any invasive non-native species encountered during the fieldwork was recorded.

2.11 Other Notable Species

The site's habitats were broadly assessed for their potential to support species of principal importance for nature conservation (Section 41 NERC Act 2006) and other notable species. This includes mammals such as harvest mouse *Micromys minutus*, hedgehog *Erinaceus europaeus*, brown hare *Lepus europaeus*, and many bird species. The site was broadly assessed for its potential to support important invertebrate assemblages with particular attention paid to features such as standing deadwood, wet flushes, bare earth banks and botanically rich areas.

3 BASELINE CONDITIONS

3.1 Designated Sites and Granted EPS Licences

The development area is within the Impact Risk Zone of the Beeding Hill to Newtimber Hill Site of Special Scientific Interest, which is located 9.2km southeast. No statutory or non-statutory designated sites were returned from the desk study, within the 1km radius search area.

The following Section 41 Priority Habitats, which are important for Nature Conservation, were found within the 1 km search area: Ancient and Deciduous Woodland, Traditional Orchard, and Coastal and Floodplain Grazing Marsh (see Figure 3). None of these Priority Habitats were located within or immediately adjacent to the main footprint of the development. Both the Ancient and Deciduous Woodland boundary, as mapped on the National Inventory, is located approximately 17m west and northwest of the proposed new holiday cottage building outline.

No European Protected Species Licence (EPSL) has been granted within 1km of the site.

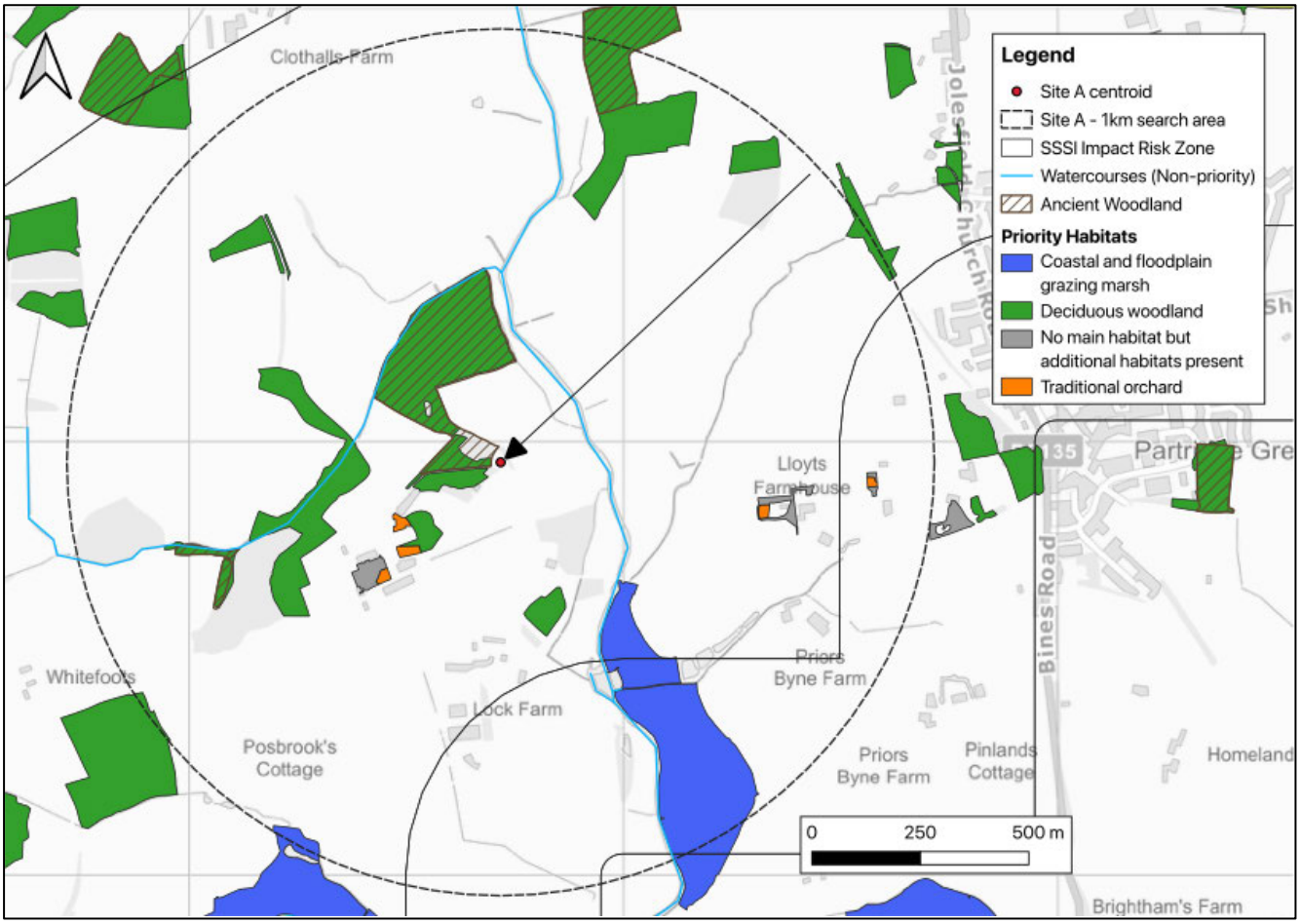

Figure 2. Designated sites and Section 41 Priority Habitats within a radius of 1km of the development boundary. The site centroid is indicated with a red dot. Image produced courtesy of QGIS mapping software version 3.44 Solothurn long term release (© 2025). Cartographer name: Alice Motola.

3.2 Habitats

The site comprises of the UKHab habitats listed below, which are also illustrated in Figure 4 and described in the next section:

- **g4 516** – Modified grassland (active management);
- **w 33** – Line of trees (L1); and
- **u1b** – Developed land; sealed surface.

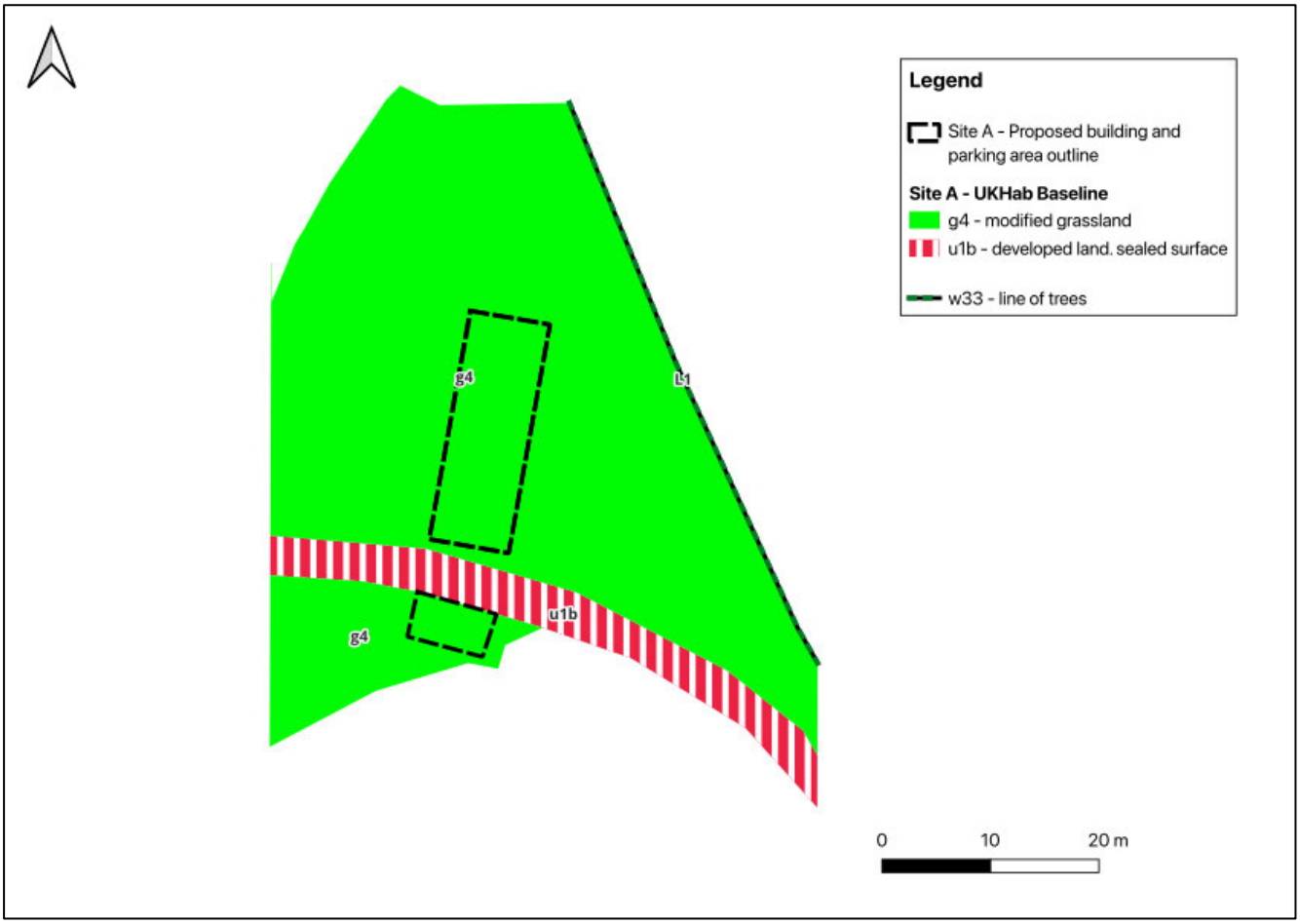

Figure 4. UKHab baseline map showing the existing habitats within the main footprint of the development. The approximate proposed building and new parking area are outlined in black. Image produced courtesy of QGIS mapping software version 3.44 Solothurn long term release (© 2025). Cartographer name: Alice Motola.

g4 102 - The development area comprises mainly of modified grassland which was actively managed (516) at a uniform, short sward height, ranging between 5-7cm on average, at the time of the UKHab survey (Photograph 1). This habitat was classified as modified grassland as the grassland was species poor (only four species per metre square were recorded on average), and the field was dominated by plants indicative of nutrient enrichment such as perennial ryegrass *Lolium perenne*, common daisy *Bellis perennis* and white clover *Trifolium repens.* Scattered areas of disturbed bare ground were observed across its full extent; the terrain presented a gentle slope and a dry ditch was observed to the west of the proposed holiday cottage location. A few different fungi species were observed within this grassland parcel, as well as tiny animal burrow cavities in the soil. The following plant species were recorded within this habitat parcel: perennial ryegrass (D)[7], Yorkshire fog *Holcus lanatus* (A), white clover (F), cock's-foot *Dactylis glomerata* (O), creeping bent *Agrostis stolonifera* (O), annual meadow-grass *Poa annua* (O), common daisy (O), creeping cinquefoil *Potentilla reptans* (O), self-heal *Prunella vulgaris* (O), common fleabane (O), curly dock *Rumex crispus* (R), fat hen *Chenopodium album* (R), creeping thistle *Cirsium arvense* (R), dove's-foot crane's-bill *Geranium molle* (R), ground ivy Glechoma hederacea (R), bristly ox-tongue *Helminthotheca echioides* (R) and common ragwort *Jacobea vulgaris* (R).

[7] The DAFOR scale is used for semi-quantitative sampling, to provide a quick estimate of the relative abundance of species (generally plants) in a given area, where D - Dominant (50-100%), A - Abundant (30-50%), F - Frequent (15-30%), O - Occasional (5-15%) and R - Rare (< 5%).

w 33 – A line of trees was recorded northeast of the proposed building location (Photograph 2). Line of trees L1 included the following plant species: pedunculate oak *Quercus robur* (D), ash *Fraxinus excelsior* (F), blackthorn *Prunus spinosa* (O), and hawthorn *Crataegus monogyna* (R). Notably, the higher canopy layer was comprised of oak and ash, whereas the shrub layer was comprised of blackthorn and hawthorn.

u1b – A hardstanding access road was recorded south of the proposed new building location and north of the proposed new parking area (Photograph 3).



Photograph 1. Modified grassland habitat, comprising the majority of the development area, located north of the existing access track.



Photograph 2. Displaying the line of trees L1 located north of the development area.



Photograph 3. Displaying the developed land; sealed surface which comprises the road access track.

[redacted]

3.4 Bats

No EPS licenses for bats were found; however, records of several bat species were returned by the desk study search, within 1km of the development area, including common pipistrelle *Pipistrellus pipistrellus* and brown long-eared bat *Plecotus auritus*.

No buildings or other structures with suitability for roosting bats were recorded within the development area.

Within the separate Arboricultural Impact Assessment report (Absolute Arboriculture, 2026)[8], two ash trees were identified within the line of trees L1 which are recommended for removal (T9 & T11 – Tree codes are the same used within the Arboricultural report). During the ground level tree assessment (GLTA), T9 and T11 were found to contain potential roost features (PRFs). A detailed description of the PRFs on each tree is found in Table 1 below and the tree features are displayed in Photograph 4 (a & b).

The modified grassland habitat provides foraging opportunities for bats and the line of trees L1 north of the development area, provides suitable foraging and commuting habitat (flightlines) for bats. L1 is also directly connected to the nearby Deciduous and Ancient Woodland priority habitat parcels located west and northwest of the development.

Table 1. GLTA results.

Tree code	Tree species	DBH	PRFs description	Evidence of bats?	Tree suitability classification	Roost suitability classification
T9	Ash	35 + 20cm	PRF-M (a): a wide longitudinal split/crack was recorded along the main stem's full length on	No	PRF	PRF-M

[8] Arboricultural Impact Assessment, Absolute Arboriculture, June 2026.

Tree code	Tree species	DBH	PRFs description	Evidence of bats?	Tree suitability classification	Roost suitability classification
			the southeastern main tree bole aspect; PRF-M (b): wound cavity was recorded at 1.5m height on the secondary smaller stem, also on the southeastern aspect of the tree. It was not possible to inspect further the depth or nature of both cavities, from a ground level. Therefore, they may be suitable for multiple bats and/ or a maternity roost.			
T11	Ash	22cm	PRF-M (a): a longitudinal crack/split was recorded on the southeastern aspect of the main tree stem at 1.3m height. The feature was 1m long and 1.5 cm maximum in width. It was not possible to inspect the depth or nature of the cavity further from ground level. Therefore, it may be suitable for multiple bats and/ or a maternity roost.	No	PRF	PRF-M



Photograph 4. Displaying from left to right: **4a** – PRF-M (a & b) on T9, **4b** – PRF-M (a) on T11. Each PRF location is indicated with a red arrow.

3.5 Breeding Birds

Several records of bird species, including species of conservation concern, were returned by the desk study search, within 1km of the development boundary, some of which may use the site.

The line of trees L1 provides suitable nesting bird habitat and is well connected to the nearby Deciduous and Ancient Woodland priority habitat parcels located west and northwest of the development.

No buildings or other structures were recorded within the development boundary with suitability for nesting birds.

The modified grassland, comprising the entire field, was unsuitable for ground nesting birds due to its uniform short sward height and given the regular level of disturbance caused by it being frequently managed as short amenity grassland.

Two trees within the line of trees L1 (T9 & T11), with suitability for nesting birds, are recommended for removal within the Arboricultural report.

3.6 Dormice

No records of dormice were returned by the desk study search, within 1km of the development boundary.

The line of trees L1 lacked hazel *Corylus avellana* and honeysuckle *Lonicera periclymenum*, which are primary food sources for dormice, however it comprised hawthorn and blackthorn, which did not create the dense shrub layer, usually required by this species and overall a rather open structure, which is not deemed to provide suitable nesting and shelter opportunities. The nearby Deciduous and Ancient Woodland priority habitat parcels located west and northwest of the development, provide higher suitability habitats for dormice.

Overall, given the above points and the presence of a public footpath along the southern aspect of the line of trees, it is reasonably unlikely that any dormice will be encountered within the main footprint of the development.

3.7 Great Crested Newts and other Amphibians

Records of great crested newts were returned by the desk study search, within 1km of the development boundary, as well as records of common frog *Rana temporaria*.

There are three ponds within 500m of the development boundary of which one is located within 250m on Magic Maps being located approximately 200m northwest of the development area (Figure 5). However, this pond, which is within the nearby Ancient and Deciduous Woodland parcel, no longer exists and was completely dry when inspected on the day of the survey visit (see Photograph 5); the next nearest pond is now located 400m southwest of the proposed development site.

The site also appears to fall within Nature Space's Green Impact Risk Zone for great crested newts.

The line of trees L1 could provide suitable foraging and resting places for great crested newts, whereas the modified grassland habitat covering almost the entire development area was characterised by a uniform short sward height at the time of the UKHab Survey (ranging between 5-7cm), which provided unsuitable structure to be used as a permanent resting place for great crested newts.

Given the distance of the development area to the nearest pond (400m) and the unsuitable habitat within the main footprint of the development, the probability of great crested newts being encountered within the main footprint of the development is low.

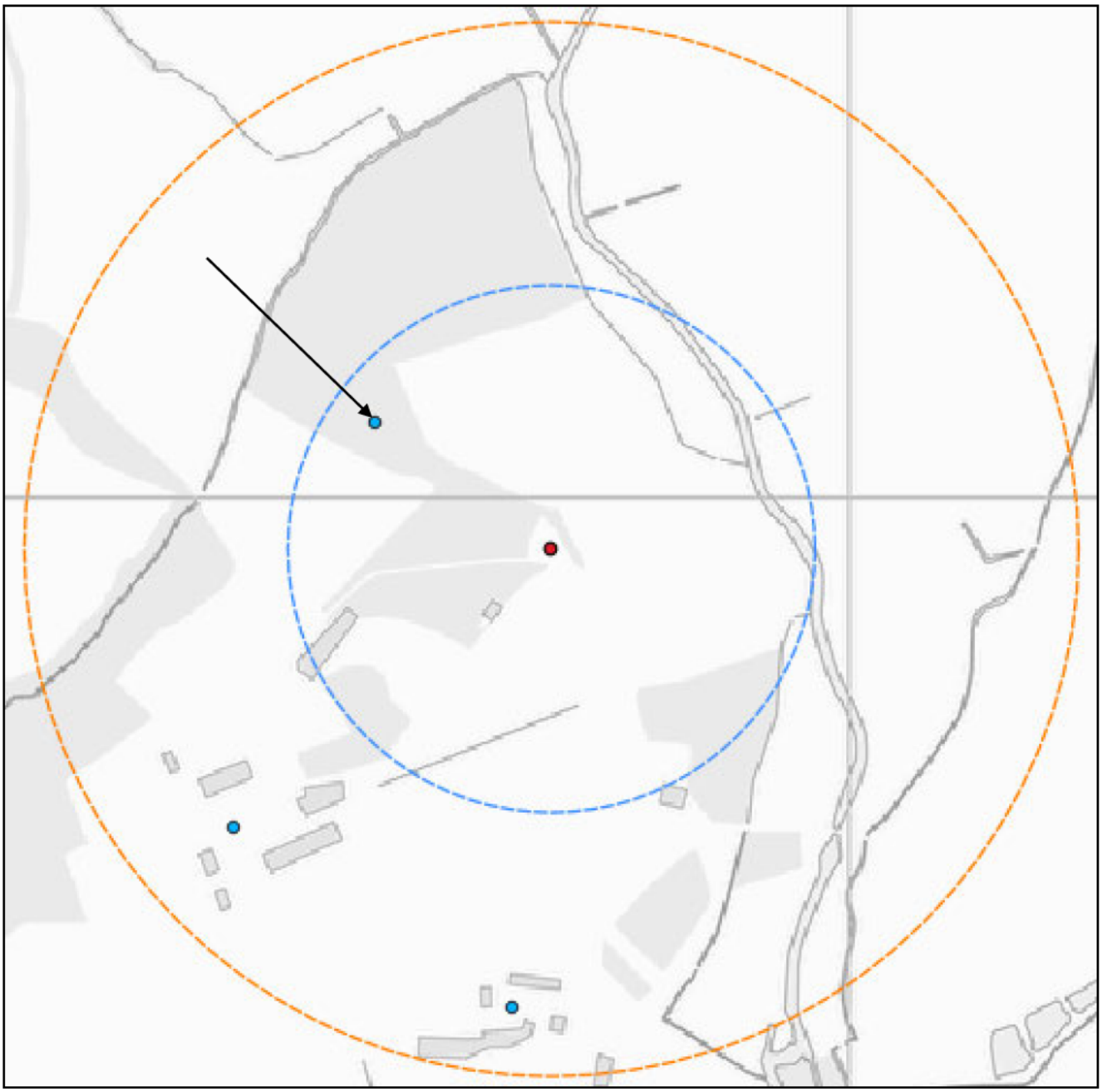

Figure 5. Ponds within 500m of the site. The development site centroid is indicated by a red dot. The dashed blue line indicates the 250m search area, whereas the dashed orange line represents the 500m search area. The pond indicated by the black arrow is the one that was found to be dry during the site visit. Image produced courtesy of QGIS mapping software version 3.44 Solothurn long term release (© 2025). Cartographer name: Alice Motola



Photograph 5. Displaying the dry pond located northwest of the development and indicated with a black arrow on Figure 5.

3.8 Reptiles

Records of grass snake, a common reptile species, were returned by the desk study search within 1km of the development boundary. No records of rare reptiles were returned.

The line of trees L1 could provide suitable foraging habitat and resting places for reptiles. The modified grassland that falls within the main footprint of the development, however, is characterised by a uniform short sward structure that is regularly mowed and managed as amenity grassland, which provides insufficient cover to support a permanent reptile population.

Based on the above, it is reasonably unlikely that a permanent population of reptiles will be present within the main footprint of the development.

3.9 Invasive Non-native Species

No evidence of invasive non-native species was found during the walkover survey.

3.10 Other Notable Species

The line of trees L1 located immediately north of the main footprint of the development provides suitable resting places for hedgehog.

3.11 Survey Limitations

An initial site assessment such as this is only able to act like a 'snapshot' to record any flora or fauna that is present at the time of the survey. It is therefore possible that some species may not have been present during the survey but may be evident at other times of the year. For this reason, habitats are assessed for their potential to support some species, even where no direct evidence (such as droppings) has been found.

4 IMPACT APPRAISAL

4.1 Designated Sites

No statutory or non-statutory designated sites are present within the 1km search area. The site falls within the IRZ of the Beeding Hill to Newtimber Hill SSSI, however given the distance between the designation to the development (9.2km) and the small scale and magnitude of the proposed works it is unlikely that the development will have any adverse impacts on the SSSI and the change of use represents an impact that is likely to result in effects that are significant at a site level only.

4.2 Habitats

No ancient woodland parcels or any other type of irreplaceable habitats are located within the development area or will be directly lost as part of the development.

No Priority Habitats were located within or immediately adjacent to the main footprint of the development or will be lost as part of the proposed works. The Ancient Woodland boundary as mapped on the National Inventory is located approximately 17m west and northwest of the proposed new holiday cottage building outline, therefore the legally required protective minimum 15m buffer between ancient woodland and any new development has already been incorporated within the proposed design layout as shown in Figure 2. Furthermore, the proposed thorny bush planting immediately west of the proposed building is deemed to contribute materially to the protection of the nearby Deciduous and Ancient Woodland Habitats of Principal Importance parcels by physically preventing any lodgers or dogs trespassing beyond within those habitats.

To safeguard both the nearby Deciduous and Ancient Woodland HPIs from damage and degradation during both the construction and operational phase of the development, the specialist arboricultural recommendations detailed within the separate Arboricultural Impact Assessment report (Absolute Arboriculture, 2026), should be followed in full.

The site is dominated by a small field of modified grassland which is regularly kept short and historically managed as amenity grassland of low ecological value and of importance at the site level only, therefore

the loss of approximately 230m^2 of grassland to facilitate the development and the change of use represent an impact that is likely to result in effects that are significant at a site level only, given the absence of any other habitats of value within the main footprint of the development. The line of trees L1 is a linear feature of ecological importance and should be retained in the future.

Ecological enhancement opportunities for habitats within the scheme are discussed below in section 5.

4.3 Biodiversity Net Gain

The development total area is below the 0.2ha threshold, and no onsite or adjacent priority habitats will be negatively impacted, therefore the proposed development will not require a biodiversity net gain assessment.

[redacted]

4.5 Bats

No buildings or other structures with suitability for roosting bats were recorded within the development area.

Within the separate Arboricultural Impact Assessment report (Absolute Arboriculture, 2026)[9], two ash trees were identified within the line of trees L1 which are recommended for removal (T9 & T11). During the GLTA of T9 and T1, both trees were found to contain PRFs and were assessed as having suitability for roosting bats (PRF-M classification), as detailed in Table 1. On the day of the site visit the client suggested he does not wish to proceed with the complete removal of T9 and T11 and instead undertake some minor tree works, to simply cut back those young thin branches facing south towards the new holiday cottage location which are devoid of any PRFs. If this is the case then, no further bat surveys of T1 and T11 will be required. However, should the plans change and include any tree works which would impact the PRFs on those trees or their complete removal, then further surveys will be required to assess the likely presence/absence of bats therein.

The line of trees L1 with suitability for foraging and commuting bats will be retained, therefore it's reasonably unlikely that the proposals would change the ability of this linear feature to function as a bat flightline.

Furthermore, as the site may be used by foraging and commuting bats, it is important that the potential for disturbance from artificial lights is considered to avoid illumination of the line of trees L1 to the north

[9] Arboricultural Impact Assessment, Absolute Arboriculture, June 2026.

and of the Deciduous and Ancient Woodland to the west and northwest of the development area, with suitability for bats. The proposed development is likely to require an 'ecologically sensitive lighting scheme' in accordance with guidance produced by the Bat Conservation Trust (summarised in Appendix 3). Notably, the current design will not make use of any external artificial lighting, and all of the building windows will be installed on the eastern elevation of the new building, therefore any internal artificial lighting will be spilling in the opposite direction of the Ancient woodland. All of those measures are deemed to be appropriate and proportioned based on the location of the new proposed building.

4.6 Breeding Birds

No buildings or other structures with suitability for nesting birds were recorded within the development area.

The line of trees L1 has the potential to support a variety of common nesting birds.

Should T9 and T11 require removal as recommended within the AIA report, since those trees have suitability for nesting birds, it will be essential to consider the nesting bird season, and any vegetation removal should be timed outside of the nesting bird season (typically 1st March to 31st August), unless features are first searched by a suitably qualified ecologist and no active nests are found. If an active nest is identified, a minimum exclusion zone for all works within a 5m radius of the nest must be established to protect it from disturbance until the young have fledged.

The site is not considered to be suitable for ground nesting birds, due to its short sward height.

4.7 Dormice

The proposed development is highly unlikely to adversely impact dormice given the absence of suitable habitats for this species within the main footprint of the development and since the line of trees L1 will be retained.

Therefore, no further surveys are recommended.

Nevertheless, as dormice are nocturnal, it is important that the potential for disturbance from artificial lights is considered, as for bats (see Appendix 3).

4.8 Great Crested Newts

The habitat removal required to enable the proposed development is limited to a small area of short regularly mowed, modified grassland, which does not provide suitable habitat for use as a resting place for great crested newts.

Therefore, the development is reasonably unlikely to result in adverse impacts to great crested newts at a population level given that no great crested newt breeding habitat will be removed or modified, the removal of habitat within 400m of the nearest pond is very small scale, the extent of works will be completed over a short timeframe, reducing the risk of a great crested newt being obstructed from

reaching their breeding or resting places.

In addition to the above, using Natural England's Great Crested Newt Rapid Risk Assessment Tool, and assuming the presence of great crested newts within all ponds within 500 m of the development boundary, the assessment indicates that the scale of habitat loss and disturbance would make the likelihood of an offence being committed 'highly unlikely' (see Table 2, Appendix 4). On this basis, and subject to the implementation of the appropriate mitigation measures outlined in the below paragraph, the risk of an offence under relevant legislation is considered to be acceptably low.

A precautionary method of works for great crested newts should be followed during the construction phase of the development. Notably, great crested newts should be discouraged from colonising the habitat within the main footprint of the development boundary by retaining the existing short length of the modified grassland with regular cutting of the grassland, preventing a long tussocky structure that could create suitable resting places for great crested newts establishing, by keeping a tidy construction site and where reasonably practical keeping building materials off ground to prevent the creation of hibernacula/ refugia for great crested newts. Additionally, any holes, pits or trenches should be kept covered overnight and checked each morning in case a newt has become trapped. Where practical it is advised to include escape ramps/sticks into any holes, pits and trenches (where it might be difficult to seal them effectively with a cover).

The precautionary method of works outlined above, does not act as legal protection for an action that would otherwise be an offence with respect to great crested newts. Therefore, in the unlikely event a great crested newt is encountered within the development boundary, works must stop, and a professional ecologist should be consulted. The ecologist's professional judgement should be relied upon to determine the need for a great crested newt mitigation licence. Works can recommence once a great crested newt mitigation licence has been obtained (if required).

4.9 Reptiles

The modified grassland that falls within the main footprint of the development, is characterised by a short sward height which is regularly mowed, and that provides insufficient cover to support a permanent reptile population.

Therefore, no further reptile surveys are recommended.

4.10 Other Notable Species

There are habitats within the development boundary with suitability for hedgehogs; therefore, the mitigation below should be followed during the construction phase of the development.

Any brush piles, compost and debris piles within the immediate footprint of the development which could provide shelter areas and hibernation potential for hedgehogs must be removed, by means of soft demolition, outside of the hibernation period (mid-October to mid-March inclusive). Measures should be taken to avoid the unnecessary killing or injury of hedgehog during construction activities. Stakeholders and contractors should remain vigilant for the presence of hedgehogs around any vegetation, debris piles or stored materials. If a hedgehog is encountered, it should be carefully moved to a safe location within

suitable retained habitat either on-site or immediately adjacent to the site. During the construction phase of the development, any excavations on site should be covered nightly or fitted with a suitable escape ramp to prevent nocturnal mammals (including hedgehog) from becoming trapped.

5 OPPORTUNITIES FOR ENHANCEMENT

The proposed development represents an opportunity for habitat enhancement to benefit insects, birds, and bats and hedgehogs. Such enhancement measures are in line with the recommendations of the NPPF and as such would be considered favourably when determining the planning application.

The following ecological enhancements relevant to the development are recommended:

Installation of artificial habitat provisions to include:

- one integrated bat tube to be installed as part of the new proposed holiday cottage building, on its southern aspect;
- one bat box to be installed on a mature tree within the line of trees L1;
- one integrated swift box to be installed as part of the new proposed holiday cottage building;
- one integrated bee brick to be installed as part of the new proposed dwelling; and
- one hedgehog box to be placed within the line of trees L1.

Native planting:
The proposed thorny bush buffer must include native shrub species and flowering species known to encourage insect diversity. Ideally, a minimum of five thorny plant species will be chosen which may include different ratios of: blackthorn, hawthorn, dog rose *Rosa canina*, buckthorn *Rhamnus cathartica* and holly *Ilex aquifolium*.

6 CONCLUSIONS

No further surveys for any protected species are required in order for the proposed development to proceed, provided that trees T9 and T11 with PRF-M classification are not removed as recommended within the AIA report.

However, should the plans change and include any tree works which would impact the PRFs on those trees or their complete removal, then further surveys of those trees will be required to assess the likely presence/absence of bats therein.

No Priority Habitats were located within or immediately adjacent to the main footprint of the development or will be lost as part of the proposed works.

To safeguard both the nearby Deciduous and Ancient woodland HPIs from damage and degradation during both the construction and operational phase of the development, the specialist arboricultural recommendations detailed within the separate Arboricultural Impact Assessment report (Absolute Arboriculture, 2026), should be followed in full.

The development total area is below the 0.2ha threshold, and no onsite or adjacent priority habitats will be negatively impacted, therefore the proposed development will not require a biodiversity net gain

assessment.

Any vegetation removal should be undertaken outside of the nesting bird season (typically 1st March to 31st August).

The mitigation measures outlined in this report for great crested newts during the construction phase of the development, should be followed in full.

As the site may be used by foraging and commuting bats, it is important that the potential for disturbance from artificial lights is considered. The proposed development is likely to require an 'ecologically sensitive lighting scheme' in accordance with guidance produced by the Bat Conservation Trust.

It is important that no habitat clearance or other site preparation work should be undertaken until planning permission has been granted and all relevant protections for habitats of importance and protected species have been detailed and implemented. Please be advised that any work to remove or modify habitats outside of typical management may undermine a future planning application.

Should you need any further advice on the information provided above, please do not hesitate to contact The Ecology Co-op, info@ecologyco-op.co.uk, www.ecologyco-op.co.uk, Office: 01798 861800.

APPENDIX 1 – Wildlife Legislation and National Planning Policy

Introduction

The following text is intended for general guidance only and does not constitute comprehensive professional legal advice. It provides a summary of the current legal protection afforded to wildlife in general and certain species. It includes current national planning policy relevant to nature conservation.

The 'Birds Directive', 'Habitats Directive' and 'Natura 2000 Sites'

The Council Directive 79/409/EEC on the Conservation of Wild Birds ("the Birds Directive") sets a framework for the protection of wild birds. Under the Directive, several provisions are made including the designation and protection of 'Special Protection Areas' (SPAs) – areas which support important bird populations, and the legal protection of rare or vulnerable species.

The Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the "Habitats Directive") directs member states of the EU to take measures to maintain the favourable conservation status of important habitats and species. This requires the designation of a series of sites which contain important populations of species listed on Annex II of the Directive (for example Bechstein's bat *Myotis bechsteinii*, Barbastelle bat *Barbastella barbastellus* and white-clawed crayfish *Austropotamobius pallipes*. Together with 'Special Areas of Conservation' (SACs), SPAs form a network across Europe of protected areas known as the 'Natura 2000 sites'.

Annex IV lists species in need of more strict protection, these are known as "European Protected Species (EPS)". All bat species, common dormice *Muscardinus avellana*, otter *Lutra lutra* and great crested newts *Triturus cristatus* are examples of EPS that are regularly encountered during development projects.

The 'Habitats Regulations'

The Conservation of Habitats and Species Regulations 2017, as amended (the "Habitats Regulations") is the principle means of transposing the Habitats Directive and the Birds Directive, and updates the Conservation (Natural Habitats, &c.) Regulations 1994 ("the 1994 regulations") in England and Wales.

'Natura 2000' sites, now known as National Site Network sites under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, receive the highest level of protection under the Regulations which requires that any activity within the zone of influence of these sites would be subject to a Habitats Regulations Assessment (HRA) by the competent authority (e.g. planning authority), leading to an Appropriate Assessment (AA) in cases where 'likely significant effects' to the conservation objectives are identified.

For European Protected Species, Regulation 41 makes it a criminal offence to:

- deliberately capture, injure or kill any such animal;
- deliberately disturb wild animals of such species;
- deliberately take or destroy their eggs (where relevant);
- damage or destroy a *breeding or resting place* of such an animal;
- possess, control, sell or exchange any live or dead animal or plant, of such species;
- deliberately pick, collect, cut, uproot or destroy a wild plant of such species.

The Habitats Directive and Habitats Regulations provide for the derogation from these prohibitions for

specific reasons provided certain conditions are met. An EPS licensing regime allows operations that would otherwise be unlawful acts to be carried out lawfully. Natural England is the licensing Authority and, in order to grant a license, ensures that three statutory conditions (sometimes referred to as the 'three derogation tests') are met:

- a licence can be granted for the purposes of "preserving public health or safety or for other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment" (Regulation 53 (2) (e);
- a licence can be granted if "there are no satisfactory alternatives" to the proposed action;
- a licence shall not be granted unless the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.

Wildlife and Countryside Act (1981) as amended.

This remains one of the most important pieces of wildlife legislation in the UK. There are various schedules to the Act protecting birds (Schedule 1), other animals including insects (Schedule 5), plants (Schedule 8), and control of invasive non-native species (Schedule 9).

Under the Wildlife and Countryside Act (WCA) 1981, all wild birds (with the exception of those listed on Schedule 2), their eggs and nests are protected by law and it is an offence to:

- take, damage or destroy the nest of any wild bird while it is in use or being built
- take or destroy the egg of any wild bird
- disturb any bird listed on Schedule 1, while it is nest building, or at a nest with eggs or young, or disturb the dependant young of any such bird.

Schedule 5 lists all non-avian animals receiving protection to a varied degree. At its strongest, the Act makes it an offence to intentionally kill, injure or take any wild animal listed on Schedule 5, and prohibits interference with places used for shelter or protection, or intentionally disturb animals while occupying such places. Examples of species with *full protection* include all EPS, common reptile species, water vole *Arvicola amphibius*, white-clawed crayfish *Austropotamobius pallipes* and Roman snail *Helix pomatia*. Other species are protected from sale, barter or exchange only, such as white letter hairstreak *Satyrium w-album*.

The Act makes it an offence to intentionally pick, uproot or destroy any plant or seed, and sell or possess any plant listed on Schedule 8. It is also an offence to intentionally uproot any wild plant not listed on Schedule 8 unless authorised [by the land owner]. Species on Schedules 5 and 8 are reviewed every 5 years when species can be added or removed.

Measures for the prevention of spreading non-native species which may be detrimental to native wildlife is included in the Act, which prohibits the release of animals or planting of plants into the wild of species listed on Schedule 9 (for example, Japanese knotweed *Fallopia japonica*, Himalayan balsam *Impatiens glandifera*, New Zealand Pygmyweed *Crassula helmsii*).

The Wildlife and Countryside Act 1981 (as amended) also prohibits certain inhumane methods of traps and devices for the capture or killing of wild animals and certain additional methods such as fixed trap, poisoning with gas or smoke, or spot-lighting with vehicles for killing species listed on Schedule 6 of the Act (this includes all bat species, [redacted] otter, polecat, dormice, hedgehog and red squirrel).

Natural Environment and Rural Communities (NERC) Act (2006)

The NERC Act (2006) created the statutory nature conservation body Natural England, and places a statutory duty on all public bodies, including planning authorities, under Section 40, to take, or promote the taking by others, steps to further the conservation of *habitats and species of principal importance for the conservation of biodiversity* in England (commonly referred to as the 'Biodiversity Duty'). This duty extends to all public bodies the biodiversity duty of Section 74 of the Countryside and Rights of Way (CROW) Act 2000, which placed a duty only on Government and Ministers. Section 41 of the NERC Act lists the habitats and species of principle importance. This includes a wide range of species from mosses, vascular plants, invertebrates through to mammals and birds. It originates from the priority species listed under the UK Biodiversity Action Plan (UK BAP) with some omissions and additions.

Environment Act (2021)

The Environment Act sets a target of halting the decline in species through the inclusion of a legally binding 2030 species abundance target. Aiming to restore natural habitats and enhance biodiversity, the Act requires new developments to improve or create habitats for nature (through mechanisms such as mandatory Biodiversity Net Gain), and tackle deforestation. Going forwards, UK businesses will need to look closely at their supply chains as amongst other measures they will be prohibited from using commodities associated with wide-scale deforestation. Woodland protection measures are also strengthened through the Act.

The Act enables the reform of the Habitats Regulations and further improves protection for nature through the establishment of Local Nature Recovery Strategies that support national Nature Recovery Networks. In addition, the Act provides for the production of Protected Site Strategies and Species Conservation Strategies, aimed at supporting the design and delivery of strategic approaches to deliver better outcomes for nature.

Protection of Badgers Act (1992)

The badger *Meles meles* is afforded specific legal protection in Britain under the Protection of Badgers Act (1992), and Schedule 6 of the Wildlife and Countryside Act 1981 (as amended) (see above).

Under this legislation, it is a criminal offence to:

- intentionally kill, injure, take, possess, or cruelly ill-treat, a badger, or to attempt to do so;
- interfere with a sett, by damaging or destroying it;
- to obstruct access to, or any entrance of, a badger sett; or
- to disturb a badger when it is occupying a sett.

A licence may be obtained from Natural England to permit certain prohibited actions for a number of defined reasons including interference of a sett for the purpose of development, provided that a certain number of conditions are met. Note that licenses are not normally granted for works affecting badgers between the end of November and the start of July.

National Planning Policy Framework (2026)

The National Planning Policy Framework (NPPF, Ministry of Housing Communities and Local Government, 2026) sets out the Governments planning policies for England and how these should be applied. The NPPF contains policies for plan-making and national decision-making policies which are material considerations in the determination of planning applications.

The NPPF supplements Government Circular: Biodiversity and Geological Conservation 06/2005 (Office

of the Deputy Prime Minister, 2005).

Conserving and Enhancing the Natural Environment

Chapter 19 of the NPPF concerns conserving and enhancing the natural environment. Its objective is to influence the design and location of development to support nature's recovery and wider environmental outcomes, safeguard important habitats, species and landscapes, and recognise the role of natural capital in delivering sustainable growth.

Identifying Environmental Opportunities and Safeguards

Policy N1: Identifying environmental opportunities and safeguards is a plan-making policy which states that development plans should safeguard and enhance the natural environment and reflect the wider benefits provided by natural capital and ecosystem services. In doing so, plans should make use of Local Nature Recovery Strategies, Protected Landscape Management Plans, River Basin Management Plans, National Forest Strategies, Community Forest Plans and other relevant evidence.

Policy N1 requires development plans to identify the hierarchy of international, national and locally designated sites and areas of landscape, biodiversity and geodiversity importance, together with other environmentally important features such as chalk streams. Plans should also identify opportunities for the conservation, enhancement and recovery of landscapes, sensitive waterbodies, habitats and priority or threatened species, including through habitat restoration, nature-based solutions and the creation and strengthening of ecological networks.

Development should be directed towards land of least environmental value where this is consistent with other policies in the NPPF. This includes avoiding and minimising harm to designated sites of importance for nature and taking account of areas identified within Local Nature Recovery Strategies as potential opportunities for environmental restoration.

Policy N1 also states that development plans should establish standards for green infrastructure provision, drawing upon Natural England's Green Infrastructure Standards for England where appropriate.

Development plans should only set local biodiversity net gain requirements exceeding the statutory biodiversity net gain requirement where these relate to specific site allocations and are fully justified and deliverable. Such local requirements should not extend to categories of development which are exempt from statutory biodiversity net gain.

Improving the Natural Environment

Policy N2: Improving the natural environment is a national decision-making policy. It states that, in order to contribute positively to the natural environment and support nature's recovery, development proposals should consider the environmental qualities of the land, including its habitats, landscape character and the natural beauty of the countryside, and identify opportunities to conserve or enhance these qualities, including through biodiversity net gain where applicable.

Development proposals should take suitable opportunities to connect to and strengthen ecological networks extending beyond the development site, drawing upon measures identified within Local Nature Recovery Strategies, National Forest Strategies, Community Forest Plans and other relevant assessments where present.
Existing natural features of visual, historic or nature conservation value, including established trees and hedgerows, should be conserved and enhanced where possible, with appropriate landscaping used to integrate development into its surroundings.

Green infrastructure and nature-based solutions should be used to secure multiple benefits, including for biodiversity, surface-water and pollution management, climate-change mitigation and adaptation, and recreation.
Development proposals should minimise adverse impacts on biodiversity and include features which support priority or threatened species, such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes, commonly known as swift bricks, unless there are compelling technical reasons which prevent their use or would make them ineffective.

Green infrastructure and other features supporting nature should be appropriately located and designed to minimise the risk of future failure, with suitable measures in place for any necessary long-term management.

Policy N2 retains the mitigation hierarchy. Where significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated or, as a last resort, compensated for, the development should be refused.

Development proposals may provide biodiversity enhancements exceeding the statutory biodiversity net gain objective. However, such additional gains should only be required where this is established through an up-to-date development plan policy relating to a specific site allocation. Decision-makers should not give weight to other development plan policies requiring biodiversity gains beyond the statutory framework, including policies seeking such gains from development which is exempt from statutory biodiversity net gain.

Trees in New Development

Policy N3: Trees in new development recognises the benefits that trees provide for biodiversity, climate-change mitigation and adaptation, and the character and quality of the built environment.

Development proposals should provide tree-lined streets unless there are strong reasons why this would be inappropriate and should incorporate trees in other suitable locations.

The selection and location of trees should take account of highways and infrastructure requirements, the needs of users of public spaces, climate-change adaptation and other environmental benefits. Appropriate arboricultural advice should be sought where necessary to ensure that suitable trees are planted in suitable locations.

Provision should also be made for the long-term maintenance of both existing and newly planted trees forming part of the development.

Protected Landscapes

Policy N4: Protected Landscapes states that development within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities. Substantial weight should be given to conserving and enhancing the natural beauty of these areas and to conserving and enhancing wildlife and cultural heritage within National Parks and the Broads.

Major development within Protected Landscapes should be refused other than in exceptional circumstances and where it can be demonstrated to be in the public interest. Consideration should include the need for the development; the scope for locating the development outside the Protected Landscape or meeting the need in another way; and any detrimental effects upon the environment, landscape and

recreational opportunities and the extent to which these could be moderated.

Where major development is exceptionally approved within a Protected Landscape, measures should be taken to mitigate potential adverse impacts on its special qualities and statutory purposes, including features such as tranquillity and dark skies. Development within the setting of a Protected Landscape should also be sensitively located and designed to avoid or minimise adverse impacts.

Maintaining the Character of the Coast

Policy N5: Maintaining the character of the coast states that development proposals should maintain the character of undeveloped areas of coast, including land designated for its landscape, habitat or heritage value, while improving public access where appropriate. Development should not hinder completion or maintenance of the King Charles III England Coast Path National Trail.

Development within areas defined as Heritage Coast which do not already fall within a Protected Landscape should be consistent with the special character of the area and the importance of its conservation. Major development within Heritage Coast areas should not be supported unless it is compatible with the area's special character.

Where development is located within a Coastal Change Management Area, Policy F9 should also be taken into consideration.

Areas of Particular Importance for Biodiversity and Geodiversity

Policy N6: Areas of particular importance for biodiversity and geodiversity provides specific decision-making principles for sites of international, national and local nature conservation importance and for irreplaceable habitats.

Development proposals affecting a site of international importance, which for the purpose of Policy N6 is a habitats site, should be refused unless an appropriate assessment concludes that the proposal would not adversely affect the integrity of the site, the relevant Habitats Regulations derogation tests can be satisfied and/or the impacts on the relevant protected features are being addressed through an applicable Environmental Delivery Plan and the developer has committed to paying the nature restoration levy.

Development proposals affecting a Site of Special Scientific Interest (SSSI) should only be supported where there would be no adverse effect, either individually or in combination with other developments, upon the features of special scientific interest; where the benefits of development in the proposed location clearly outweigh both the likely impacts upon the SSSI and any broader effects upon the national network of SSSIs; or where the relevant impacts are being addressed through an applicable Environmental Delivery Plan and nature restoration levy.

Development proposals affecting a site of local importance, including a Local Nature Reserve, Local Wildlife Site, Local Geological Site or equivalent designation identified in the development plan, should only be supported where there would not be a significant adverse effect upon the integrity of the site, or where the benefits of the development in the proposed location clearly outweigh the likely impacts upon the features which make the site valuable for nature conservation.

Irrespective of a site's nature conservation designation or status, development proposals resulting in the loss or deterioration of irreplaceable habitats, such as ancient woodland and ancient or veteran trees, should be refused unless there are wholly exceptional reasons and a suitable compensation strategy is provided.

Policy N6 applies to development both within and outside a designated area where the development could affect the identified biodiversity or geodiversity value of that area.

Priority or Threatened Species

The NPPF defines 'priority or threatened species' as species which are particularly vulnerable to the impacts of development. This includes, but is not limited to, species of principal importance in England identified under Section 41 of the Natural Environment and Rural Communities Act 2006, species listed in Schedules 2 and 5 of the Conservation of Habitats and Species Regulations 2017, and species protected under the Wildlife and Countryside Act 1981.

Ground Conditions and Pollution

Policy P3: Living conditions and pollution states that development proposals should be appropriate for their location, taking account of the likely effects, including cumulative effects, of pollution upon health, living conditions and the natural environment, whether these effects occur on or off-site. Consideration should be given to the sensitivity of the site and the surrounding environment.

Development proposals should avoid giving rise to, or contributing to, unacceptable levels of air, noise, artificial light, water, soil or other forms of pollution on or beyond the site. Adverse effects should be avoided where possible or otherwise mitigated to an acceptable degree, and opportunities should be taken to reduce existing pollution where possible.

Development proposals should limit adverse impacts from artificial light upon local amenity, intrinsically dark landscapes and nature.

Development proposals should also assess and mitigate impacts where development could have an unacceptable adverse effect upon water quality, particularly in relation to sensitive waterbodies such as chalk streams.

UK Post-2010 Biodiversity Framework

The UK Biodiversity Action Plan (UK BAP), first published in 1994, was the UK's response to the commitments of the Rio Convention on Biological Diversity (1992) until 2010, when the UK BAP was replaced by the UK Post-2010 Biodiversity Framework. This framework covers the period 2011 to 2020 and forms the UK government's response to the new strategic plan of the United Nations Convention on Biodiversity (CBD) published in 2010. This promotes a focus on individual countries delivering target for protection for biodiversity through their own strategies.

The most recent biodiversity strategy for England, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' was published by Defra (2011), and a progress update was provided in July 2013 (Defra 2013).

'Biodiversity 2020' builds on the Natural Environment White Paper for England – 'The Natural Choice', published on 7 June 2011, and sets out the strategic direction for biodiversity policy for the next decade.

Biodiversity 2020 deliberately avoids setting specific targets and actions for local areas and species because the Government believes that local people and organisations are best placed to decide how to implement the strategy in the most appropriate way for their local area or situation.

Birds of Conservation Concern (BoCC)

In 1996, the UK's leading non-governmental bird conservation organisations listed the conservation status

of all bird species in the UK against a series of criteria relating to their population size, trends and relative importance to global conservation. The lists, known as the 'Red', 'Amber' and 'Green' lists (in order of decreasing concern) are used to inform key conservation policy and decisions. The lists are reviewed every five years and are a useful reference for determining the current importance of a particular site for birds. The most recent review was undertaken in 2021 (Stanbury et al, 2021), which provides an up to date assessment of the conservation status of birds in the UK.

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APPENDIX 2 – *Horsham District Council – Horsham District Local Plan 2023-2040 (December 2023)*

Policy number/title	Policy summary
Strategic Policy 13: The Natural Environment and Landscape character	The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats, will be protected against inappropriate development. The Council will expect development proposals to be landscape-led from the outset so that they clearly inform the design and layout. Proposals will also be required to: 1. Protect, conserve and enhance the landscape and townscape character, taking into account features / areas identified as being of landscape importance and the individual settlement characteristics, and maintain settlement separation; 2. Maintain and enhance the Green Infrastructure Network, the Local Nature Recovery Strategy and national Nature Recovery Network and, where practicable, help to address any identified needs and deficiencies in these networks across the District; 3. Maintain and enhance the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, and secure measurable net gains in biodiversity; and 4. Incorporate SuDS into a scheme in an optimal location for their purpose whilst also securing landscape and biodiversity enhancements and delivering high-quality green spaces. Proposals will be expected to provide details to demonstrate that the 62 whole life management and maintenance of the SuDS are appropriate, deliverable and will not cause harm to the natural environment and/or landscape.
Strategic Policy 14: Countryside Protection	1. Outside built-up area boundaries and secondary settlements, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to, and justify, its countryside location, and must meet one of the following criteria: a) Support the needs of agriculture or forestry b) Enable the extraction of minerals or the disposal of waste; c) Provide for quiet informal recreational use; or d) Enable the sustainable development of rural areas. 2. In addition, all proposals must be appropriately integrated within the landscape and be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, conserves, and seeks to enhance, the key features and characteristics of the landscape character area in which it is located, including; a) The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change; b) The pattern of woodlands, fields, hedgerows, trees, waterbodies and other features; c) The landform of the area; and The protection of dark skies, in particular where it may impact on a designated International Dark Sky Reserve (IDSR), Neighbourhood Plan designations and High Weald AONB Management Plan objectives.
Strategic Policy 16: Protected Landscapes	1. Development proposals within and adjacent to the High Weald AONB must demonstrate how their development proposals conserve and enhance the natural beauty of the AONB, having appropriate regard to the setting and views into and out of the AONB, the High Weald AONB Management Plan, any updates and any other relevant

	documents. Proposals will be required to set out any proposed mitigation or compensation measures needed to address any harm. 66 2. Small scale development that helps to support the social and economic well-being of the AONB will be supported, provided that the scheme is compatible with the purpose of the designation. 3. Major development within the AONB will only be permitted in exceptional circumstances. Applicants will be required to demonstrate why the proposal is in the public interest and what alternatives to the proposal have been considered. 4. Proposals within land that contributes to the setting of the South Downs National Park should be consistent with National Park purposes and have regard to the South Downs Local Plan, the South Downs Integrated Landscape Character Assessment, the South Downs Partnership Management Plan and any other relevant document and updates. In particular, proposals should not cause harm to the special qualities (including dark skies), local distinctiveness or sense of place, by negatively affecting views into and out of the National Park. Proposals will be required to set out any proposed mitigation or compensation measures needed to address any harm.

APPENDIX 3 – Reducing Impacts of Artificial Light

Bright external lighting can have a detrimental impact upon foraging and commuting bat flight paths, but more importantly can also cause bats to remain in their roosts for longer. Artificial lighting can also cause significant impacts to other nocturnal species, most notably moths and other nocturnal insects. It can also result in disruption of the circadian rhythms of birds, reducing their fitness.

Guidelines issued by the Bat Conservation Trust[10] should be referred to when designing the lighting scheme. Note that lighting designs in very sensitive areas should be created with consultation from an ecologist and using up-to-date bat activity data where possible. The guidance contains techniques that can be used on all sites, whether a small domestic project or larger mixed-use, commercial or infrastructure development. This includes the following measures:

Avoid lighting key habitats and features altogether

There is no legal duty requiring any place to be lit. British Standards and other policy documents allow for deviation from their own guidance where there are significant ecological/environmental reasons for doing so. It is acknowledged that in certain situations lighting is critical in maintaining safety, such as some industrial sites with 24-hour operation; however, in the public realm, while lighting can increase the perception of safety and security, measurable benefits can be subjective. Consequently, lighting design should be flexible and be able to fully consider the presence of protected species.

Apply mitigation methods to reduce lighting to agreed limits in other sensitive locations – lighting design considerations

Where bat habitats and features are considered to be of lower importance or sensitivity to illumination, the need to provide lighting may outweigh the needs of bats. Consequently, a balance between a reduced lighting level appropriate to the ecological importance of each feature and species, and the lighting objectives for that area will need to be achieved. The following are techniques which have been successfully used on projects and are often used in combination for best results:

- dark buffers, illuminance limits and zonation;
- sensitive site configuration, whereby the location, orientation and height of newly built structures and hard standing can have a considerable impact on light spill;
- consideration of the design of the light and fittings, whereby the spread of light is minimised ensuring that only the task area is lit. Flat cut-off lanterns or accessories should be used to shield or direct light to where it is required. Consideration should be given to the height of lighting columns. It should be noted that a lower mounting height is not always better. A lower mounting height can create more light-spill or require more columns. Column height should be carefully considered to balance task and mitigation measures. Consider no lighting solutions where possible such as white lining, good signage, and LED cats eyes. For example, light only high-risk stretches of roads, such as crossings and junctions, allowing headlights to provide any necessary illumination at other times;
- screening, whereby light spill can be successfully screened through soft landscaping and the installation of walls, fences and bunding;
- glazing treatments, whereby glazing should be restricted or redesigned wherever the ecologist and lighting professional determine there is a likely significant effect upon key bat habitat and features;

[10] Bat Conservation Trust and Institute for Lighting Professionals (2023) Guidance note 8. Bats and Artificial Lighting. https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/

- creation of alternative valuable bat habitat on site, whereby additional or alternative bat flightpaths, commuting habitat or foraging habitat could result in appropriate compensation for any such habitat being lost to the development;
- dimming and part-night lighting. Depending on the pattern of bat activity across the key features identified on site it may be appropriate for an element of on-site lighting to be controlled either diurnally, seasonally or according to human activity. A control management system can be used to dim (typically to 25% or less) or turn off groups of lights when not in use.

Demonstrate compliance with illuminance limits and buffers

- *Design and pre-planning phase*; it may be necessary to demonstrate that the proposed lighting will comply with any agreed light-limitation or screening measures set as a result of your ecologist's recommendations and evaluation. This is especially likely to be requested if planning permission is required.
- *Baseline and post-completion light monitoring surveys*; baseline, pre-development lighting surveys may be useful where existing on or off-site lighting is suspected to be acting on key habitats and features and so may prevent the agreed or modelled illuminance limits being achieved.
- *Post-construction/operational phase compliance-checking;* as a condition of planning, post-completion lighting surveys by a suitably qualified person should be undertaken and a report produced for the local planning authority to confirm compliance. Any form of non-compliance must be clearly reported, and remedial measures outlined. Ongoing monitoring may be necessary, especially for systems with automated lighting/dimming or physical screening solutions.

Lighting Fixture Specifications

The Bat Conservation Trust recommends the following specifications for lighting on developments to prevent disturbance:

- Lighting spectra: peak wavelength >550nm
- Colour temperature: <2700K (warm)
- Reduction in light intensity
- Minimal UV emitted
- Upward light ratio of 0% and good optical control

APPENDIX 4 – Natural England Rapid Risk Assessment Tool

Table 2. Natural England Rapid Risk Assessment Tool Results.

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability score
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding pond(s)	No effect	0
Land >250m from any breeding pond(s)	0.01 - 0.1 ha lost or damaged	0
Individual great crested newts	No effect	0
	Maximum:	0
Rapid risk assessment result:	GREEN: OFFENCE HIGHLY UNLIKELY	

Further reading:

Buglife (2011) A review of the impact of artificial light on invertebrates.

Royal Commission on Environmental Pollution (2009) Artificial light in the environment. HMSO, London. Available at: https://www.gov.uk/government/publications/artificial-light-in-the-environment

Rich, C., Longcore, T., Eds. (2005) Ecological Consequences of Artificial Night Lighting. Island Press. ISBN 9781559631297.

CPRE (2014) Shedding Light: A survey of local authority approaches to lighting in England. Available at: http://www.cpre.org.uk/resources/countryside/dark-skies/item/3608-shedding-light

Planning Practice Guidance guidance (2014) When is light pollution relevant to planning? Available at: https://www.gov.uk/guidance/light-pollution

Institution of Lighting Professionals (2021) Guidance Notes for the Reduction of Obtrusive Light GN01:2011. Available at: https://www.theilp.org.uk/resources/free-resources/

Voigt, C.C., Azam, C., Dekker, J., Ferguson, J., Fritze, M., Gazaryan, S., Hölker, F., Jones, G., Leader, N., Lewanzik, D. and Limpens, H., 2018. *Guidelines for consideration of bats in lighting projects*. Unep/Eurobats. Available at: https://cdn.bats.org.uk/uploads/pdf/Resources/EUROBATSguidelines8_lightpollution.pdf?v=1542109376

End.