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Preliminary Ecological Appraisal

Site Name

Woodview School

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Salutem Ltd

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About the Author

This report has been prepared by Sam Lunn, a Principal Ecologist at The Ecology Co-op, with 12 years' experience. He has a Level 2 bat survey licence and level 1 survey licences for great crested newts and dormice and has prepared numerous European Protected Species licences. As a Full member of the Chartered Institute for Ecology and Environmental Management (CIEEM) and as Chartered Ecologist through this body, he is bound by their code of professional conduct.

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 the Chartered Institute of Ecology and Environmental Management (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 Salutem Ltd to undertake a Preliminary Ecological Appraisal and bat scoping assessment of part of Woodview School, further to a proposal to demolish all buildings and some areas of the woodland to facilitate modular buildings across a four year programme.
Context	The site measures approximately 4.1ha and situated to the northwest of Five Oaks village. The site is part of Woodview School with the main site further north. The survey site consists of several buildings and residential dwellings within a woodland setting that has been left unmanaged and the buildings left derelict. Large woodland parcels and a mixture of arable and pastoral fields form the wider surroundings.
Key findings	Building 1 has a confirmed bat roost and high potential to support other bat roosts not yet identified. Buildings 2, 5 and 7 have low potential to support roosting bats. The woodland that dominates the site has potential to support [REDACTED], bats, nesting birds, dormice, bats, reptiles and great crested newts.
Recommendations	Three bat emergence surveys are recommended for Building 1 and one emergence survey for Buildings 2, 5 and 7. In addition, in relation to the loss of woodland, further surveys have been recommended for bats (tree assessments and activity surveys), breeding birds, dormice, great crested newts and reptiles.
Are further surveys required?	Yes.



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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) and bat scoping assessment of land at Woodview School by Salutem Ltd. This report presents the findings of a walkover survey undertaken by Sam Lunn, a Full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM) and Natural England Level 2 Bat Survey Class Licence holder, and Holly Waters, an associate member of CIEEM, on 21st August and 4th September 2025 respectively. 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 the proposed development. Recommendations for further surveys that are likely to be required to inform a planning application and Ecological Impact Assessment (EclA) 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. It is not intended for submission in support of a planning application but can be used to inform a future Ecological Impact Assessment (EclA).

1.2 Background

The site measures approximately 4.1ha and is situated to the northwest of Five Oaks village. The site is part of Woodview School with the main site further north. The survey site consists of several buildings and residential dwellings within a woodland setting that has been left unmanaged and the buildings left derelict. Large woodland parcels and a mixture of arable and pastoral fields form the wider surroundings. The postcode for the site is RH14 9AX and the grid reference is TQ 0919 2865. Figure 1 shows the boundary of the site.

The proposed development/project includes the demolition of all of the buildings on site including the old staff hostel building to facilitate a new school using modular buildings over a four-year programme. The project would also include areas of hard-standing for use as a car park and recreational play. The illustrative proposed plans are shown in Figure 2.



Figure 1. An aerial image showing the location of the site. The approximate site boundary is outlined in red. Image produced courtesy of Google maps (map data ©2025 Google).

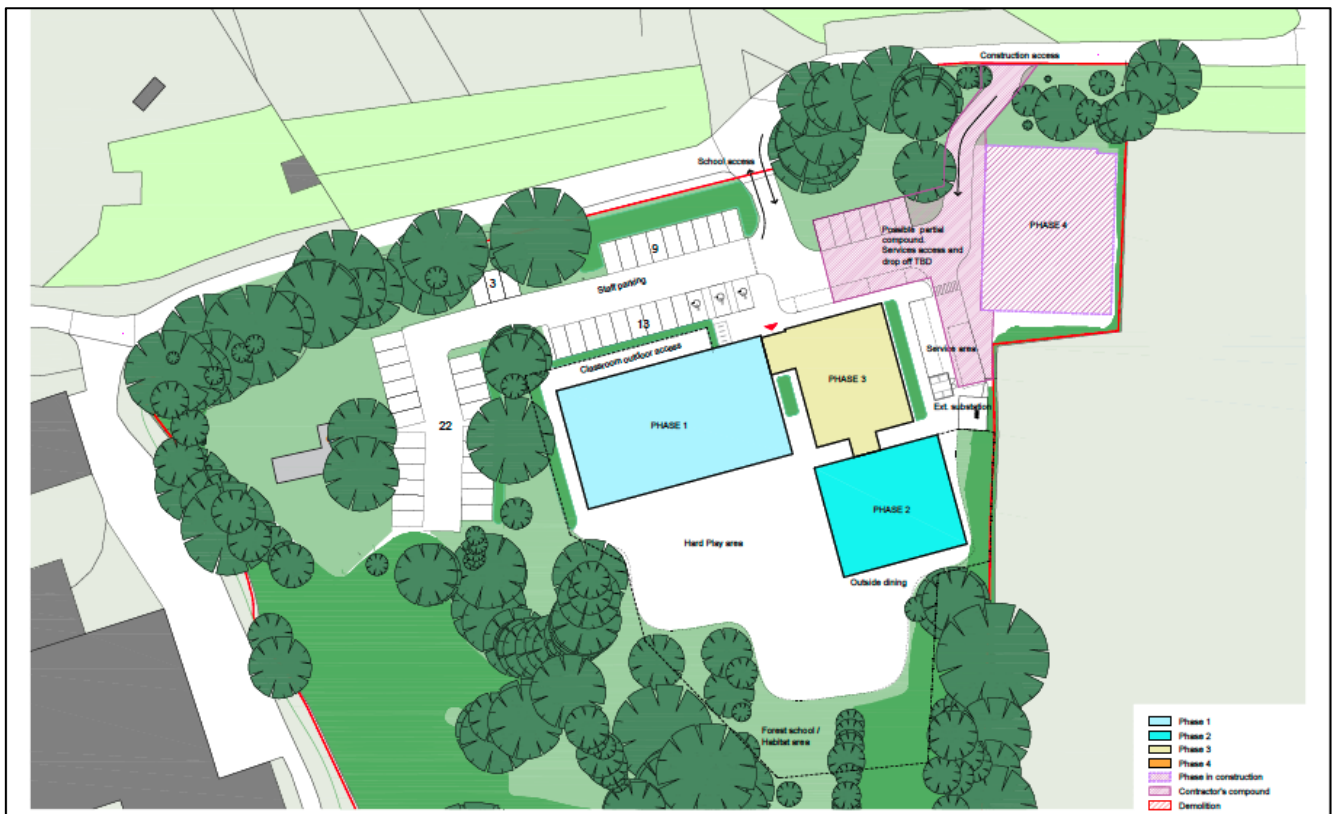


Figure 2. The proposed site plan showing all four phases at Ingfield Woodview School. Produced by Miller Bourne Architects. Drawing reference: 4908-MBA-ZZ-ZZ-D-A-0106, Rev P01. Dated 01.07.2025.



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 Appraisal¹, but also consider the Guidelines for Ecological Report Writing, Second Edition².

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 on-line 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 across two days on the 21st August and 4th September 2025, during which the habitats contained within the site were described and evaluated in accordance with standard UK Habitat Classification (UKHab)³. The dominant species and indicators of important habitat types such as ancient woodland or unimproved grassland were recorded.

UKHab survey presents a standardised system for classifying and mapping wildlife habitats in all parts of Great Britain, including urban areas. The aim of the survey is to provide, relatively rapidly, a record of the vegetation and wildlife habitats present. The habitat classification is based principally on vegetation, augmented by reference

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.

³ The UK Habitat Classification Working Group (2018) *The UK Habitat Classification User Manual* at <http://ecountability.co.uk/ukhabworkinggroup-ukhab>



to topographic and substrate features, particularly where vegetation is not the dominant component of the habitat.

Data was gathered through a site walkover survey and use of on-line aerial photography to broadly categorise the habitats present using the UKHab classifications⁴. The results are presented as a map showing the distribution of habitat categories across the site. Target notes are used to describe specific features of biodiversity interest and record indicator species where appropriate. In addition to this, notable habitats, such as habitats listed under the NERC Act, 2006, are highlighted.

The UKHab methodology is a recognised tool for initial scoping of potential ecological constraints and opportunities, and for identifying potential effects of the proposed development as part of the planning application process.

As part of the Preliminary Ecological Appraisal, the site features were evaluated for their potential to support legally protected species and 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 and any specific limitations to the survey(s), such as access constraints, are set out in section 2.11

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[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.

Detailed building inspections were carried out in accordance with best practice guidance as set out by the Bat Conservation Trust⁶; the inspection comprised identification of potential access points and 'Potential Roost Features' (PRFs) that bats could use and any evidence indicating the presence of bats using the buildings, such as rub marks, feeding remains, staining or droppings. The survey included a ground-based external inspection

⁴ UK Habitat Classification Working Group (2018). *UK Habitat Classification – Habitat Definitions V1.0* at <http://ecountability.co.uk/ukhabworkinggroup-ukhab>

⁵ Harris, S, Cresswell, P. and Jefferies, D. (1989). *Surveying Badgers*. Mammal Society.

⁶ Collins, J.(ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edn). The Bat Conservation Trust, London.



around the buildings and internal inspections of any enclosed loft spaces or roof voids, where safe access was possible. All buildings were assessed both internally and externally using a ladder, torch and endoscope where necessary.

The potential for roosting bats for each feature, or group of features was assessed as none, negligible, low, moderate, or high, in accordance with best practice. Any evidence confirming the presence of bats was clearly recorded including photos and samples taken (e.g. droppings), where appropriate. Further surveys have been recommended.

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 Concern⁷ and those species afforded special protection on Schedule 1 of the Wildlife and Countryside Act (1981). Further surveys have been recommended as appropriate.

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 guidance⁸.

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)⁹. 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.

⁷ 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.

⁸ Bright, P., Morris, P. and Mitchell-Jones, T. (2006). *The dormouse conservation handbook 2nd Ed.* English Nature, Peterborough.

⁹ 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.



Further surveys have been recommended as appropriate, in accordance with best practice guidance (English Nature 2001)¹⁰.

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 have been recommended as appropriate.

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 have been recommended as appropriate.

2.10 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 dead-wood, wet flushes, bare earth banks and botanically rich areas.

2.11 Constraints/Limitations to Surveys

Surveys record any flora or fauna that is present at the time of the survey visits. It is therefore possible that some species may not have been present during the surveys but may be evident at other times of the year and may appear or disappear from the site if habitat conditions change. For this reason, the surveys are considered valid for up to eighteen months for [REDACTED] and bats, two years for reptiles and three years for great crested newts and dormice. If the habitat conditions change significantly in the intervening period, then it is recommended that the surveys be updated.

¹⁰ English Nature (2001). *Great Crested Newt Mitigation Guidelines*. English Nature, Peterborough.



Some of the buildings couldn't be accessed internally but as they supported flat roofs with very limited gaps around the roof edge, this was not considered a significant constraint to providing an assessment of the buildings for their potential to support bats.

3 BASELINE CONDITIONS

3.1 Designated Sites and Granted EPS Licences

There are no statutory or non-statutory designated sites within the zone of influence of the site and therefore sites designated for nature conservation are unlikely to be a consideration for the proposed development. The Mens Special Area of Conservation (SAC) is 5.7km away from the site and comprises an extensive area of mature beech *Fagus sylvatica* woodland rich in lichens, bryophytes, fungi and saproxylic invertebrates, and is one of the largest tracts of Atlantic acidophilous beech forests in the south-eastern part of the habitat's UK range. It is the primary reason for the site's designation. Barbastelle *Barbastella barbastellus* bats are present as a qualifying feature but not a primary reason for site selection.

There are Ancient and semi-natural woodlands to the north (30m) and south (65m) of the site. The woodland in the southwest corner of the site is designated as Priority Habitat Deciduous woodland.

There are no granted EPS licences for mitigation projects within 1km of the site boundary.

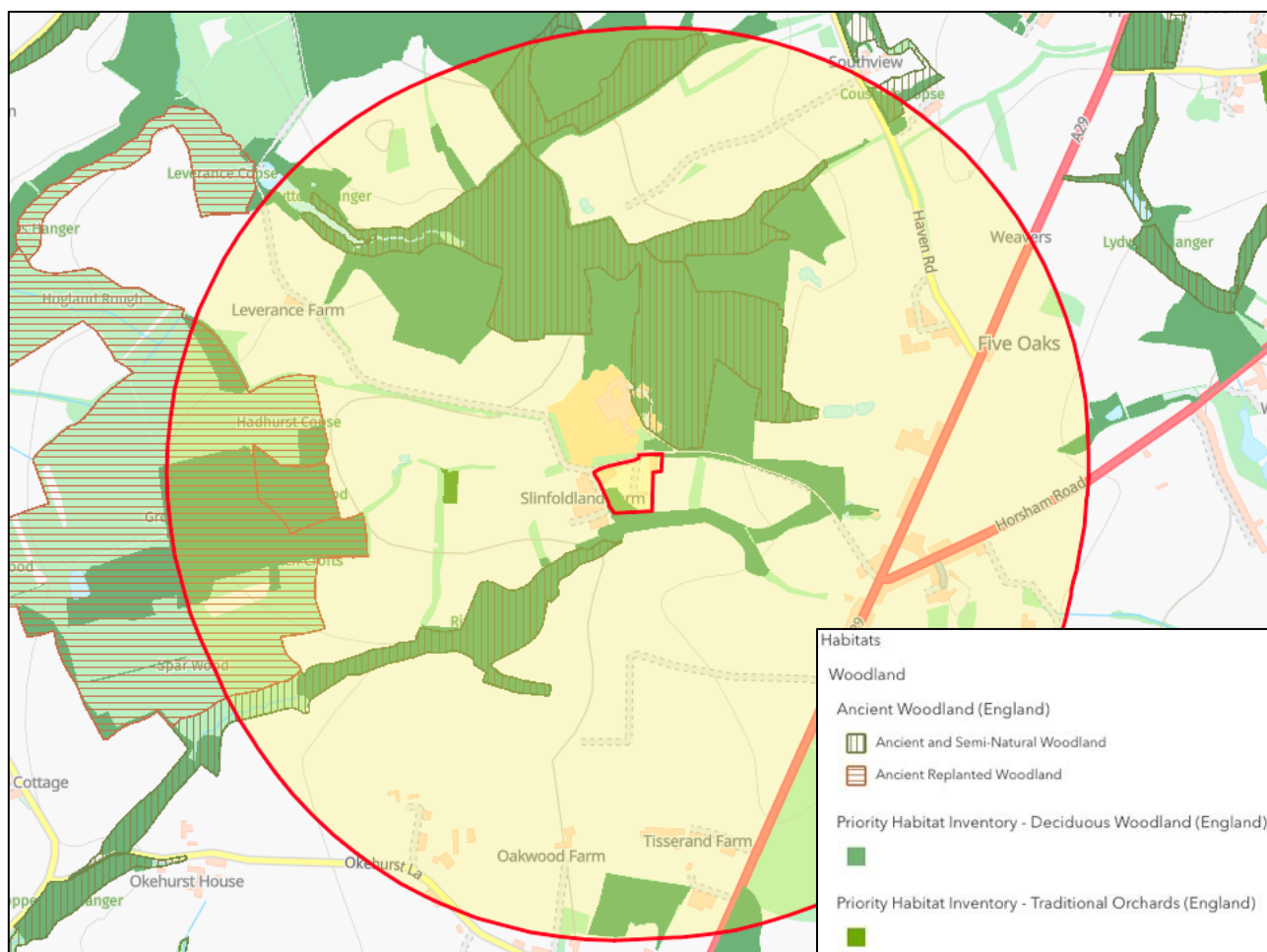


Figure 3. Habitats of importance for nature conservation. Image produced courtesy of Magic maps (<http://www.magic.gov.uk/>, contains public sector information licensed under the Open Government Licence v3.0).

3.2 Habitats

The majority of the habitat within the site is broadleaved woodland with an understory dominated by bramble that has spread out from the southwestern corner and encroached into most of the residential gardens (Figure 4). There are a number of buildings scattered through the site and small amounts of bramble scrub and mixed scrub. Modified grassland is present in two areas associated with two of the buildings.

Table 1 below lists the UKHab habitats found at the site with the general species composition of these habitats. Note that detailed information on buildings and ponds with respect to bats and great crested newts are presented in the following sections. The habitat map for the site and key to the standard mapping symbols used is presented in Figure 4. Photographs of important areas of habitat are presented below.



Figure 4. The UKHab map for existing habitats at Woodview School.

Table 1. The UKHab habitat contained within the site.

Habitat type	UKHab Code	Area (ha) length (m)	Species composition	Ecological importance
Other woodland; broadleaved	W1g	3.4ha	A total of nine woody species: oak <i>Quercus robur</i> , field maple <i>Acer campestre</i> , silver birch <i>Betula pendula</i> , <i>salix sp</i> , beech <i>Fagus sylvatica</i> , hawthorn <i>Crataegus monogyna</i> , ash <i>Fraxinus excelsior</i> , hazel <i>Corylus avellana</i> , and horse chestnut <i>Aesculus hippocastanum</i> were present. In addition, the following plants were identified; tree of heaven <i>Ailanthus altissima</i> , bramble <i>Rubus fruticosus</i> , Spanish dagger <i>Yucca gloriosa</i> , common ivy <i>Hedera helix</i> , <i>Bromus sp.</i> , wrinkled viburnum <i>Viburnum rhytidophyllum</i> , hydrangea <i>Hydrangea macrophyllum</i> , bracken <i>Pteridium aquilinum</i> , Lawson cypress <i>Cupressus lawsoniana</i> , <i>Malus sp.</i> , cherry laurel <i>Prunus laurocerasus</i> , spear thistle <i>Cirsium vulgare</i> , buddleja <i>Buddleja davidii</i> , <i>Rosa sp.</i> , common nettle <i>Urtica dioica</i> , ground ivy <i>Glechoma hederacea</i> , pendulous sedge <i>Carex pendula</i> , curled dock <i>Rumex crispus</i> , arrow bamboo <i>Pseudoasasa japonica</i> , pumpkin <i>Curcubita maxima</i> , male fern <i>Dryopteris filix-mas</i> and dog's mercury <i>Mercurialis perennis</i> .	Local
Bramble scrub	H3d	0.03ha	Bramble scrub.	Site



Habitat type	UKHab Code	Area (ha) length (m)	Species composition	Ecological importance
Ruderal		0.046ha	Spear thistle <i>Cirsium vulgare</i> , common fleabane <i>Pulicaria dysenterica</i> , moth mullein <i>Verbascum Blattaria</i> , tree of heaven, bramble, oxeye daisy <i>Leucanthemum vulgare</i> , lesser burdock <i>Arctium minus</i> , bristly oxtongue <i>Helminthotheca echioides</i> , and curled dock <i>Rumex crispus</i> .	Site
Modified grassland	G4	0.09ha and 0.066ha	Two areas of grassland. The first is immediately west of the main staff hostel building (B1) and comprises the following species: yarrow <i>Achillea millefolium</i> , creeping cinquefoil <i>Potentilla reptans</i> , red fescue <i>Festuca rubra</i> , agrimony <i>Agrimonia eupatoria</i> , bramble, curled dock <i>Rumex crispus</i> , Yorkshire-fog <i>Holcus lanatus</i> , White clover <i>Trifolium repens</i> and ribwort plantain <i>Plantago lanceolata</i> . The second area surrounds one of the residential buildings (B?) and comprises common fleabane, creeping cinquefoil, yarrow, sorrel <i>Rumex acetosa</i> , ribwort plantain, perennial ryegrass <i>Lolium perenne</i> , <i>Poa sp.</i> , and white clover.	Site
Buildings	U1b5	Total = 0.284ha	n/a	Site
Other developed land	U1b6	Total = 0.206ha	n/a	Site
Other standing water, ditch	r1g 50	Length = 0.198km	n/a	Site



Photograph 1. An example of the woodland habitat that dominates the site.



Photograph 2. An example of the woodland shaw habitat along the northern boundary of the site.



Photograph 3. An example of the woodland habitat within the site.



Photograph 4. The modified grassland to the west of Building 1.



Photograph 5. Ruderal habitat close to Building 1.



Photograph 6. An example of the ditch that runs along the northern and western boundary of the site.



Photograph 7. An example of the bramble scrub that surrounds Building 5.



3.4 Bats

There are nine buildings present within the site and all were assessed for their potential to support roosting bats. Full descriptions of each building are detailed in Table 2 and photos in Appendix 4.

The site contains high value habitat in the form of broadleaved woodland which dominates the site and is likely to provide high value foraging habitat for a wide range of species. The site is also connected to larger parcels of woodland to the northeast and southwest both of which contain Ancient and semi-natural woodland.

The Sussex biodiversity record centre search indicates the presence of six species and three genus of bats within 2km of the site.

Table 2. Species recorded by the SxBRC within 2km of the Woodview School site.

Species/Genus	Abundance
Barbastelle <i>Barbastella barbastellus</i>	1
Serotine <i>Eptesicus serotinus</i>	4
Noctule <i>Nyctalus noctula</i>	5
Common pipistrelle	73
Soprano pipistrelle	7
Brown long-eared	9
Myotis <i>Myotis sp.</i>	2
Pipistrelle <i>Pipistrellus sp.</i>	1
Long-eared <i>Plecotus sp.</i>	4

Table 3. Potential roost features for bats.

Building / Section building	Description of features	Assessment of suitability
Building 1 – Main staff hostel - External	A two-storey brick building with hanging tiles on some parts of the building including south elevation and northeast corner, north elevation, and northwest corner. Gaps were present across all hanging tile elevations. The pitched roof is comprised of concrete tiles and support a small number of gaps on both elevations under both field and ridge tiles. There are two ground floor sections that extend south with flat roofs. The soffits around these ground floor sections have large gaps in places with low potential for roosting bats.	Moderate bat roost suitability
Building 1 – Internal	Loft void 1 measures 8m x 10m x 1.5m and had a combination of breeze block and brick walls with predominantly bitumen lining and a small section of Tyvek membrane. This void connects to Void 2 via a small gap in the apex of wall. The floor of Void 1 is boarded and approximately 500	Confirmed bat roost in Void 1 Void 2 – high bat roost



Building / Section building	Description of features	Assessment of suitability
	droppings were identified morphologically similar to long-eared bats. About 20% of the droppings appeared fresh. Loft void 2 could not be accessed but as there is a gap in the wall that connects it to Void 1, it can be assumed that bats are also using Void 2 as well. Loft void 3 is a small area of roof on the ground floor with large gaps in the roof letting in lots of light and exposing the area to the elements. No evidence of bats was identified. Loft void 4 is also on the ground floor. Part of the ceiling had collapsed and part of the roof, reducing the potential for bats to none.	suitability Void 3 – none Void 4 – none
Building 2 - external	This building is a garage attached to Building 1 with a flat roof with limited gaps on those elevations that could be viewed. The features on this garage are mostly rotten/split wood below the roof edge. The inside of the garage could not be inspected.	Low bat roost potential
Building 3	A small outbuilding used to cover an oil tank. Constructed of brick walls on three sides with a flat wooden roof on top. There are gaps along the three wall elevations exposing the area to the elements. No evidence of bats was identified	Negligible bat roost potential
Building 4	A breeze block storage unit divided into five sections each with a metal door on the front. The building has a flat metal corrugated roof. Only two of the sections could be accessed. There are no features present except for a small break on one wall and no evidence of bats was identified.	Negligible bat roost potential
Building 5 - external	A brick built residential building with a steep pitched roof made of slate tiles. There are several dormer windows on both sides of the roof with flat roofs covered in bitumen lining. The roof supports limited gaps except for a small section of the roof on the southern elevation which has broken tiles. There is some lead flashing lifted below the dormer windows and small gaps under tiles at base of chimneys. The shiplap weatherboarding on east and west elevations is flush with no features apart from a small gap at the apex on both sides.	Low bat roost suitability
Building 5 - internal	The loft void measures 4m x 8m x 3m and was lined with insulation material reducing the suitability for bats and potentially preventing access. No evidence of bats was found.	Negligible bat roost suitability
Building 6 - external	A single storey breeze block building with a flat roof. Plastic weatherboarding surrounds the first floor of the building. There are no obvious features present, the lip of the bitumen roof could support gaps suitable for an individual bat but these are likely to be superficial. The building is surrounded by dense scrub so the roof edge could not be properly investigated.	Negligible bat roost suitability
Building 7 - external	A single storey breeze block building with a flat roof. There are a small number of gaps in the plastic soffits as well as gaps between the render and breeze block wall and gaps between a window and wall on the west elevation.	Low bat roost suitability
Building 8 - external	A single storey breeze block building with a flat roof. Plastic weatherboarding around the first floor. The southern elevation is covered in ivy. No features suitable for bats were identified. There are small gaps	Negligible bat roost suitability



Building / Section building	Description of features	Assessment of suitability
	where the roof edge creates a lip but these are superficial.	
Building 9 - external	A single storey breeze block building with a flat roof. Plastic weatherboarding around the first floor. No features suitable for bats were identified. There are small gaps where the roof edge creates a lip but these are superficial.	Negligible bat roost suitability

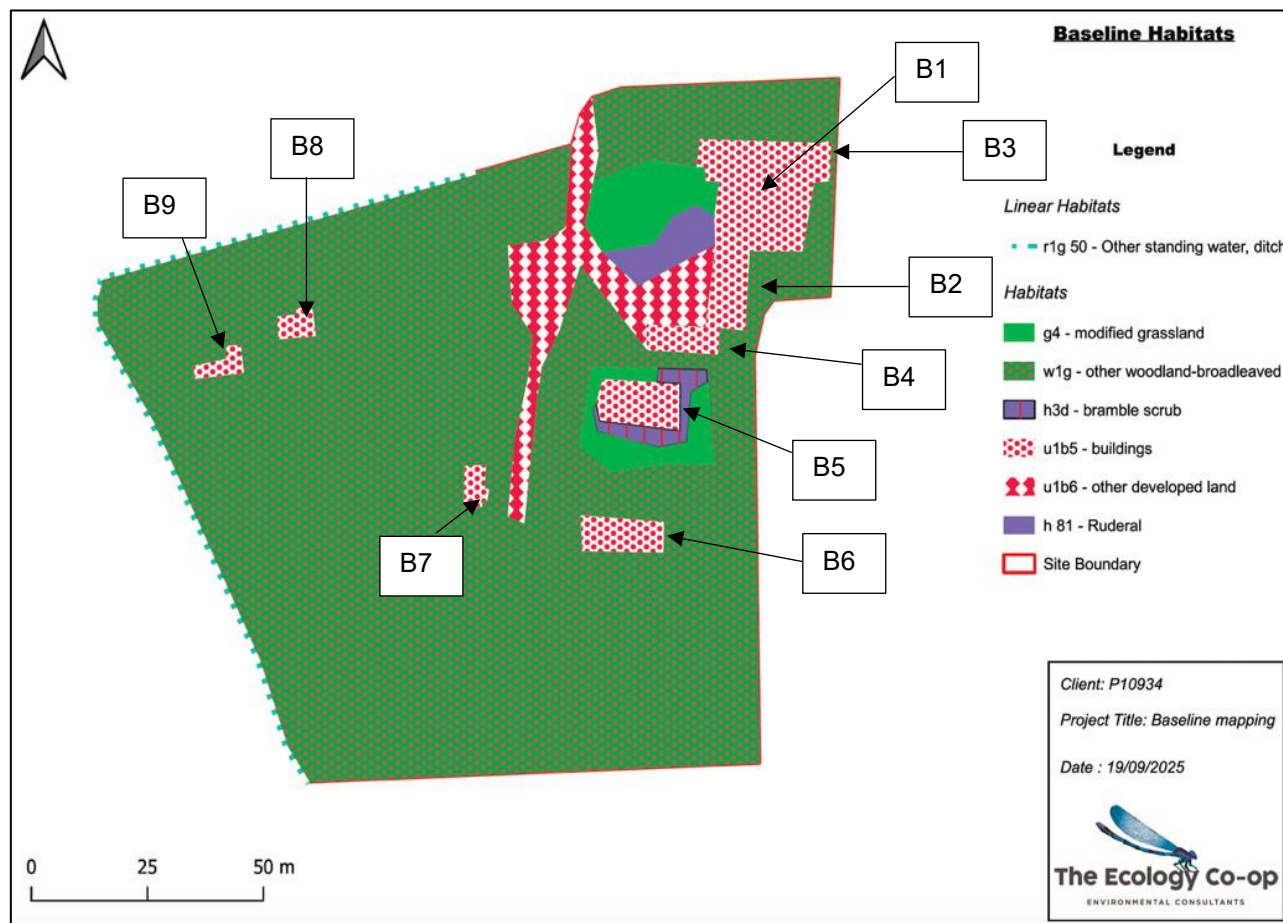


Figure 5. Building locations to accompany table 3.

3.5 Breeding Birds

The woodland habitat that dominates the site as well as the small amount of scrub habitat present has the potential to support a variety of common nesting birds. Some of the buildings (B1, B2 and B5) also support features large enough to support species such as house sparrow *Passer domesticus*.

The SxBRC provided bird records for a total of 80 species. Most of these species are relatively common and widespread, but the list includes 15 species of principal importance for conservation (S41 NERC Act 2006), and seven species listed on Schedule 1 of the Wildlife and Countryside Act. In addition, 17 species are red listed on the Birds of Conservation Concern lists.



3.6 Dormice

The woodland and scrub habitats contained within/and bordering the site have high potential to support common dormouse. These habitats are ecologically well connected to an extensive network of similar habitats across the local landscape. The presence of hazel in the shrub layer, extensive woodland edge habitat and interconnectivity around the site all contribute to the suitability of the site for dormice.

The SxBRC did not identify dormouse records in the search area. While no records of this species were provided, this species is known to be under-recorded and could occur in any suitable habitat in West Sussex.

3.7 Great Crested Newts and other Amphibians

There are 11 ponds within 500m of the site but only one pond (pond 1) within 250m which is within the wider school grounds to the north. None of the ponds could be accessed at the time of the survey. The woodland and scrub habitat within the site provides high value terrestrial habitat for amphibians and if great crested newts are in the local area, it is likely that they are present within the site.

The SxBRC search identified one record for great crested newts in 2024 with an abundance of 2 individuals, however there is no grid reference associated with the record.

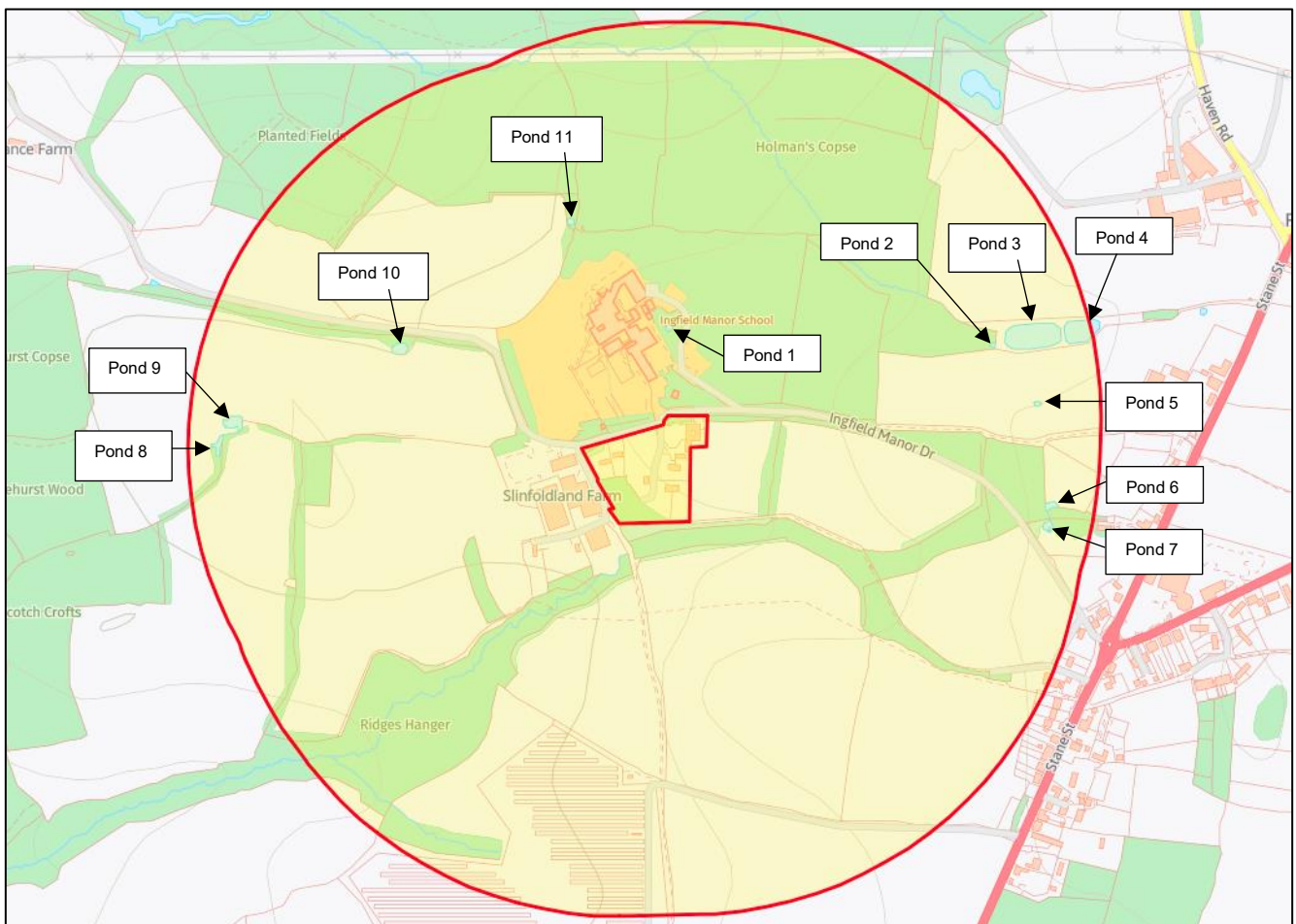


Figure 5. Ponds within 500m of the site. Image produced courtesy of Magic maps (<http://www.magic.gov.uk/>, contains public sector information licensed under the Open Government Licence v3.0).



3.8 Reptiles

The woodland, scrub and grassland habitats on site provide high value habitat for the common species of reptile providing places to bask, places to shelter and places to forage. There are compost heaps and brash piles close to some of the residential buildings as well as dead wood throughout the woodland which will provide shelter for the winter.

The SxBRC found no records of reptiles within 2km of the site suggesting that the area is under recorded rather than likely absent of reptiles.

3.9 Riparian Wildlife

There is a small stream approximately 40m south of the site which will not be directly impacted by the proposed development.

There is a ditch that runs along the northern and western boundaries which is very shallow and was dry at the time of the survey. There is little to no vegetation present and it is unlikely to support any riparian wildlife as a result.

The SxBRC search did not identify any records within 2km of the site.

3.10 Invasive Non-native Species

Several invasive species were identified across the site including tree of heaven *Ailanthus altissima*, wrinkled Viburnum *Viburnum rhytidophyllum*, moth mullein *Verbascum Blattaria*, Spanish dagger *Yucca gloriosa*, Lawson cypress *Chamaecyparis lawsoniana*, cherry laurel *Prunus laurocerasus*, buddleja *Buddleja davidii*, and arrow bamboo *Pseudosasa japonica*. Most of these will have escaped or be present in the residential gardens that once existed.

The SxBRC search indicates the presence of 11 species within 2km of the site. The closest record was for a beetle, *Harmonia axyridis*, approximately 775m south dated 2015.

3.11 Other Notable Species

The woodland habitat that dominates the site has the potential to support hedgehog *Erinaceus europaeus* and stag beetle *Lucanus cervus* given the amount of dead wood throughout the woodland.

The SxBRC identified one record for hedgehog from 2005 within 2km of the site.

3.12 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.

Buildings 6–9 could not be accessed internally. However, as all of these buildings had flat roofs, there were no void spaces that could have been assessed. This is not considered to be a significant constraint to the scoping assessment of the site for bats.

4 IMPACT APPRAISAL

4.1 Designated Sites

The site is within the zone of influence for The Mens (12km buffer) and an HRA assessment is likely to be required which would also take into consideration water neutrality at the site.

There are no other designated sites within close proximity to the site and therefore there are no other identified mechanisms of impact on designated sites as a result of the proposed development.

4.2 Habitats

The woodland habitat that dominates the site will be directly impacted by the proposed development over the course of the four phases with a proportion of the woodland set to be removed to facilitate the four buildings, car-parking and hard-standing play area. A large part of the woodland will be retained, and this must be protected and enhanced through a management strategy to improve its condition including the removal of invasive species. The woodland habitat is considered to be important at the local level.

The proposed development would also result in the loss of modified grassland and ruderal habitat which are of lower ecological value, although the ruderal habitat could still support the odd reptile or amphibian in their terrestrial phase. These habitats are not considered to be important beyond the site level.

The proposed works would likely result in noise and dust pollution within the woodland habitat, in the absence of mitigation. All retained habitat would need to be fenced off from machinery with acoustic buffers fitted and dust suppression techniques in line with construction standards would need to be applied on hot, dry days.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



4.4 Bats

Out of the nine buildings surveyed, five of the buildings (B3, B4, B6, B8 and B9) were considered to have negligible potential to support roosting bats and no further surveys or mitigation measures are required on these buildings.

Building 1 has a confirmed bat roost within void 1 and in accordance with the Bat Conservation Trust guidelines, the overall potential for the building to support bats is rated as high. A three-visit bat emergence/re-entry survey is required to determine the importance of this building to bats. All surveys must be conducted during the peak activity period between May and September, whilst two of the three visits must be between May and August.

Buildings 2, 5 and 7 have low potential to support roosting bats and in accordance with the Bat Conservation Trust guidelines, if these buildings are to be demolished as part of the proposed plans, then a single visit bat emergence/re-entry survey is required to determine the importance of the buildings to bats. All surveys must be conducted during the peak activity period between May and August as September is a sub-optimal month for bat activity.

The woodland habitat that dominates the site has potential to support roosting bats within some of the semi-mature and mature trees present. As some of the woodland is proposed to be removed, a ground level tree assessment is recommended for those areas to gain a better understanding of how many trees support features suitable for roosting bats and understand how important those areas of woodland are for roosting bats.

The woodland and scrub habitat are also likely to be used by foraging and commuting bats as part of a wider resource across the landscape. As some areas of the woodland are proposed for removal, further surveys in the form of night-time bat walkover surveys are recommended to allow a better understanding of the importance of the site to bats and potential effects of the development proposals on the existing bat population using the site and within the zone of influence. In accordance with current survey guidelines, this should include a minimum of three walked transect surveys (one per season) and at least six static logger assessments (one per month) spread across the active season (April to mid-October).

The woodland is also connected to larger parcels of woodland including ancient and semi-natural woodland parcels, and although there are no obvious linear pathways between the site and The Mens, the site could still be used by barbastelle bats in some capacity.

Based on the proposed plans, a part of the retained woodland habitat would be used for forest school during the operational phase of the project, which is likely to result in increased noise levels during certain times of the day.

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 (summarised in Appendix 3).

4.5 Breeding and Wintering Birds

The woodland habitat dominating the site has high potential to support a variety of common nesting birds as well as some woodland specialists. As part of the woodland is to be removed, it is recommended that a breeding bird survey is undertaken to understand the importance of the site for nesting birds. Breeding bird surveys consist of six site visits across March to June.



The scrub habitat and several of the buildings also have potential to support common nesting birds and all will be removed as part of the proposed development across the four phases. Given the small amount of scrub habitat present to be removed and the small number of features suitable for nesting birds on the buildings it is recommended that these habitats are removed/demolished outside of the nesting season for birds (avoiding March to August inclusive) or alternatively they must be thoroughly hand-searched prior to removal where practical to do so.

There is no potential for wintering birds on site due to a lack of suitable habitats.

4.6 Dormice

Habitats are present that are suitable for dormice, including woodland habitat that dominates the site and small pockets of scrub habitat. It is therefore strongly recommended that a survey is undertaken in accordance with current best practice guidelines to determine the presence or likely absence of dormice. Dormice surveys involve fixing at least 50 purpose-made nest tubes or boxes onto trees and checking for signs of occupation during the active period from April to October.

The woodland habitat to be retained must be protected and enhanced where possible. Where direct impacts on habitat used by dormice cannot be avoided, an EPS licence would be necessary to allow the development to proceed legally. Mitigation and compensation measures would be required under such a licence, for example careful timing of activities and planting of native-species hedgerows and scrub, where appropriate.

Small amounts of dormouse habitat can be removed under a non-licensed method statement and precautionary mitigation providing the area is subjected to a thorough finger-tip search looking for evidence of presence

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

4.7 Great Crested Newts

The woodland habitat proposed to be removed provides high value terrestrial habitat for amphibians and as a result, an environmental DNA survey is recommended on Pond 1 at the very least and where possible, all other ponds within 500m of the site should be subject to the same survey method to determine presence / likely absence of great crested newts within those ponds. Where a positive result is returned and the pond is connected to the site via woodland habitat then a population survey may be required depending on the full scope of the works and access permissions or alternatively the project could be suitable for a District Level Licence provided by Naturescape.

4.8 Reptiles

The woodland provides suitable foraging habitat and shelter for all common species of reptile and As the woodland habitat is proposed to be removed, a presence/ likely absence reptile survey is recommended consisting of seven checks spread across the active season between March and October to understand the importance of the site for



reptiles. The optimal months for survey are April, May and September but they can be undertaken at any time from April to October, provided weather conditions are suitable.

If presence of reptiles is confirmed through such a survey, a reptile mitigation strategy is likely to be required by the planning authority. This may involve the capture and translocation of reptiles to a suitable receptor site nearby if an on-site receptor cannot be included in the plans.

4.9 Invasive Non-native Species

Several non-native species were identified across the site, mostly within the woodland and the removal of these species as part of a woodland management plan would benefit the site overall. Replacing any non-native species with native plants will improve the biodiversity of the site.

4.10 Other Notable Species

The woodland habitat has the potential to support hedgehog and stag beetle. All excavations must be covered at night to prevent hedgehogs from falling into any pits and failing that an escape mechanism such as a wooden plank should be provided to allow hedgehogs (and other wildlife) to climb out. As areas of woodland would be removed as part of the proposal, the vegetation should first be searched by hand by an experienced ecologist and any hedgehogs found must be relocated to areas of woodland being retained. Similarly, any dead wood removed from areas of woodland must be relocated into retained woodland areas to ensure that stag beetles have sufficient habitat to lay their eggs in.

5 OPPORTUNITIES FOR ENHANCEMENT

The proposed development represents an opportunity for habitat enhancement to benefit insects, birds, and bats. Any planting scheme should include native shrub species and flowering species known to encourage insect diversity. 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 woodland would benefit greatly from a management strategy including the removal of invasive species, strategic thinning of the densest areas and additional planting of native species in other areas. More species specific enhancements will be detailed following the completion of the further surveys.

6 CONCLUSIONS

The site is dominated by woodland habitat with most buildings situated inside the woodland habitat. All buildings will be demolished and areas of the woodland will be lost, although some of it will be retained. Additionally, areas of modified grassland and ruderal habitat will also be lost.

The demolition of Building 1 will result in the permanent destruction of a bat roost and further surveys are required to determine the species of bat and type of roost and to identify if any other bat roosts are present. Three other buildings also require a presence/absence bat emergence survey. The woodland habitat that dominates the site is suitable for [REDACTED] bats, breeding birds, dormice, great crested newts and reptiles and a suite of protected species surveys have been recommended. It is important that a sensitive lighting strategy is implemented as part



of the design of the this project to ensure the woodland to be retained is not adversely impacted by artificial light.

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 *Satyrrium 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

The National Planning Policy Framework (NPPF 2024)¹¹ sets out the Government's view on how planners should balance nature conservation with development and helps ensure that Government meets its biodiversity commitments with regard to the operation of the planning system.

Paragraph 185b, states that council plans should "*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue*

¹¹ HM Government (2024). National Planning Policy Framework. Department for Communities and Local Government. Available online at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf.



opportunities for securing measurable net gains for biodiversity.”

The Office of the Deputy Prime Minister (ODPM) Circular 06/2005, 2005)¹². In accordance with the NPPF, it is important that developments should contribute to and enhance the natural and local environment by:

- minimising impacts on existing biodiversity and habitats;
- providing net gains in biodiversity and habitats, wherever possible;
- establishing coherent ecological networks that are more resilient to current and future pressures.

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 d) 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.
Strategic Policy 17: Green Infrastructure and Biodiversity	Green Infrastructure 1. Development will be supported where it can demonstrate that it maintains and enhances the existing network of green infrastructure and contributes to the delivery of public open space, the Local Nature Recovery Strategy, Nature Recovery Network, natural capital, ecosystem services and / or biodiversity. Green Infrastructure should be integral to the design and layout of development, and new provision, including green linkages, should be provided taking into account Natural England's green infrastructure guidance and the council's green infrastructure strategy. Provision should seek to optimise public access to open space and nature via foot, bicycle, wheeling, and also horse as appropriate. 2. Proposals that would result in any loss, degradation or harmful impacts to green infrastructure, or core areas of the Local Nature Recovery Strategy and Nature Recovery Network will be resisted unless it can be demonstrated that new opportunities will be provided that appropriately mitigates and / or compensates for the respective harm and ensures that the ecosystem services of the area are retained and enhanced. Development proposals will be expected to remove invasive species. 3. Proposals will be expected to retain and enhance existing priority habitats and trees, and accord with the aims and objectives of the Green Infrastructure and Local Nature Recovery Strategies. Habitat enhancement including additional hedgerow and tree planting must take account of the local landscape and habitat context. It should seek to optimise biodiversity, ecological connectivity and function, and climate change resilience. a) Development likely to affect a watercourse and its associated corridor should seek to conserve and enhance its ecological, landscape and recreational



	value. This should include providing adequate natural buffer zones to the watercourse. Biodiversity 5. The Council will support appropriate new development which delivers at least 12% biodiversity net gain and: - Retains and enhances significant features of nature conservation value on development sites; - Makes a positive contribution to biodiversity and accords with the aims and objectives of the Green Infrastructure and Local Nature Recovery Strategies, through the creation of appropriate green spaces, that provide linkages between habitats to create local and regional ecological networks that enable the movement of wildlife through development sites; and / or - Following the principle of 'right habitat in the right place', significantly increases woodland or other habitats for the purpose of appropriately enhancing biodiversity, carbon sequestration, pollution control, and / or flood mitigation. 6. Relevant development proposals will be expected to deliver 12% biodiversity net gain and must submit Biodiversity Net Gain information to show how this will be achieved using the mandated Biodiversity Metric or the Small Sites Metric as appropriate and must abide by the metric trading rules. Submissions must make clear what will be provided to meet no net loss and what will deliver net gains. The net gain must be achieved through the delivery of appropriate on-site biodiversity net gain or, where this is not practicable, through off-site net gain within the District especially areas, as suitable to the habitats subject to gain, identified in the District's Green Infrastructure Strategy or the Local Nature Recovery Strategy, or as agreed by the Council. All such schemes, excluding any respective element using statutory biodiversity credits, must submit for approval by the Council a funded maintenance and management plan, including monitoring / reporting and appropriate enforcement processes, that secures the biodiversity net gains for at least 30 years. 7. All other development proposals must seek to demonstrate how measurable biodiversity net gains will be delivered. Protected Sites and Species 8. Proposals must give appropriate consideration to protected and notable species. They will be expected to protect priority species and seek to aid their recovery, and must conserve, restore and enhance priority habitats, and should create and manage appropriate new habitats, taking into account pollination, where practicable. 9. Particular consideration will be given to the hierarchy of sites and habitats, including buffer areas, within the District, or functionally linked to, as follows: - Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites; - Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), Veteran Trees, Ancient Woodland and other irreplaceable habitats; 75 - Local Wildlife Sites (LWS), Local Nature Reserves (LNRs) and any areas of priority habitats including traditional orchards, local geodiversity, Core Sites in the emerging NRN and other irreplaceable habitats not already identified in a & b above. 10. An appropriate buffer around woodland will be required, this will be at least 15m around Ancient Woodland or greater in accordance with good practice, and
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	consideration should be given to the potential for protected species, such as bats, and impacts on hydrology. Around ancient and veteran trees a minimum buffer zone of at least 15 times larger than the diameter of the tree, or 5 metres from the edge of the tree's canopy whichever is the larger, will be required. 11. Where the felling of a tree is necessary, for example due to disease, replacement planting with a suitable tree species, age and location to retain and enhance the link with the wider network of habitats and Green Infrastructure, will be required. 12. Where development is anticipated to have a direct or indirect adverse impact on sites or features of importance to nature conservation, development will be refused unless it can be demonstrated that: a) The mitigation hierarchy has been applied and the objectives of a site's designation, where applicable, and integrity of the area will not be undermined; b) The reason for the development clearly outweighs the likely impact to notified features and / or the need to protect the value of the site; and c) Appropriate mitigation and compensation measures will be provided alongside the delivery of measurable biodiversity net gain as relevant. 13. Any development with the potential to impact the Arun Valley SPA / SAC / Ramsar site, The Mens SAC and / or Ebernoe Common SAC will be subject to a Habitats Regulation Assessment to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the Habitat Regulation Assessment of this Plan.
Policy 18: Local Green Space	1. Local green and open spaces should be protected. Areas designated as Local Green Space, as identified on the Policies Map, will be safeguarded from development unless it can be demonstrated that: a) Development is proposed to enhance Local Green Space functions, for example through improvements to access, recreation and wildlife; or b) It is required for a statutory utility infrastructure purpose, for example water, gas, electricity or telecommunications provision. 2. Within Neighbourhood Plans, the creation of new areas of Local Green Space will be supported providing it is within reasonably close proximity to the community it serves, is local in character and is not an extensive track of land. It must also meet the relevant criteria, as set out in any relevant national planning guidance documents, in relation to scale, beauty, historic significance, recreational value, tranquillity and ecological value, and does not conflict with the strategic policies of this Local Plan.



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 Trust¹³ 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

¹³ 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/>



features;

- 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.

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/EUROBATGuidelines8_lightpollution.pdf?v=154210937

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APPENDIX 4 – Photographs of Buildings



Photograph 1 & 2. The southern elevation of Building 1.



Photograph 3. Internal view of loft void 1 within Building 1 with bat droppings at the front of the photo on the floor.



Photograph 4. The internal aspect of Building 3.



Photograph 5. The low potential feature on Building 2.



Photograph 6. The northern elevation of Building 4.



Photograph 7. The southern elevation of Building 5.



Photograph 8. Building 6 located within woodland habitat.



Photograph 9. The western elevation of Building 7.



Photograph 10 & 11. Building 8 on the left and Building 9 on the right.