

RMA 11 Moat House: Ecological Mitigation and Management Plan

July 2026

**Phase 1 – Mowbray,
North Horsham**

Prepared by
CSA Environmental

On behalf of Legal and General
(Strategic Land North Horsham) Ltd

Report No: CSA/8141/03A

This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

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1.0 INTRODUCTION

- 1.1 This report has been prepared by CSA Environmental on behalf of Legal & General (Strategic Land North Horsham) Ltd and sets out an Ecology Mitigation and Management Plan (EMMP) in relation to the Reserved Matters Area (RMA) 11 covering the proposal for Moat House, which comprises the demolition of the existing garage and outbuilding and provision of 11 residential (C3) units, including conversion of the existing dwelling into 2 residential units situated within Phase 1 of the mixed-use development at 'Mowbray', North Horsham.
- 1.2 Strategic development at Mowbray is subject to an outline planning permission (DC/16/1677) and will provide up to 2,750 dwellings alongside retail and business areas, leisure and education facilities, Public Open Space, and associated landscaping and infrastructure. Development is being delivered in three phases, with each phase being subject to RMAs for each reserved matters area of development. This EMMP relates to Phase 1, RMA 11 Moat House (hereafter referred to as 'the Site').
- 1.3 The EMMP has been prepared to address Condition 49 of outline planning permission (DC/16/1677) in relation to RMA 11. The wording of the condition is as follows:

Pre-Commencement Condition 49:

"Any application seeking approval of Reserved Matters pursuant to the planning permission shall be accompanied by a detailed Ecological Mitigation and Management Plan (EMMP), which shall be in accordance with the approved Phase-wide EMMP, shall incorporate any additional or amended recommendations arising from the up to date Ecological Surveys relevant to that Reserved Matters Area and shall include details of protection of retained habitat and avoidance measures with regards to protected and notable species. The EMMP shall include details of pre-works, during works and post-works measures including any on-going management and maintenance necessary to ensure the effectiveness of the mitigation and enhancement measures. Any application seeking approval of Reserved Matters which includes a Proposed Primary Road, as shown on the Parameter Plan: Movement and Access reference 2153A-103P received by the LPA on 6th March 2017 shall be accompanied by detailed design proposals for those road(s), including all ecological mitigation, such as dark corridors, underpasses and bridges and drawings including cross sections and details of associated fencing and landscaping to guide wildlife. The development shall thereafter be carried out in accordance with the approved details."

Reason:

“As this matter is fundamental to safeguard and enhance the ecology and biodiversity of the area in accordance with Policy SD6 and Policy 31 of the Horsham District Planning Framework (2015), the Wildlife and Countryside Act 1981 (as amended), Conservation of Habitats and Species Regulations 2010 (as amended), The Badger Act 1992, NERC Act 2006 and the NPPF.”

Background

- 1.4 The Site is situated in the centre of Phase 1, within the Mowbray, north Horsham development (see Appendix A for a site wide phasing plan). The site is surrounded by a moat water body (at approximate central grid reference TQ 18789 33818). Detailed landscape proposals for RMA 11 have been produced by David Jarvis Associates, July 2026 (2898-5-2-35-DR-0001-S5-P5 Moat house GENERAL ARRANGEMENT).
- 1.5 A suite of ecological surveys has been conducted across the wider Mowbray development, and specifically within Phase 1, from 2010 to 2023 by other ecological consultants. The findings of previous ecological surveys that incorporate the Moat House Site will be referenced within this report.
- 1.6 In addition to these drawings, a Landscape and Ecological Management Plan (LEMP) has been produced relating to the entire Phase 1 area by David Jarvis Associates (Landscape and Ecological Management Plan – Phase 1, September 2021) to satisfy Condition 35:
- 1.7 *Pre-Occupation Condition 35: No part of the development hereby permitted within any sub-phase or part of the development shall be occupied until a Landscape and Ecological Management Plan (LEMP) detailing the long term management and maintenance principles including long term design objectives, management responsibilities, a description of landscape components, management prescriptions and maintenance schedules for the landscape buffers and areas of strategic open space as shown on the Strategic Landscape Buffers Plan (drawing number no.2153A-210D) and within the appropriate sub-phase or part of the development has been submitted to and approved in writing by the Local Planning Authority.*

The development shall thereafter be managed and maintained in accordance with the approved details.

Reason: To ensure a satisfactory development and in the interests of visual amenity and nature conservation in accordance with Policy 33 of the Horsham District Planning Framework (2015).

- 1.8 The Phase 1 LEMP was approved by Horsham District Council in 2021 (Horsham District Council ref: DISC/21/0139).

2.0 AIMS AND OBJECTIVES

Aims

- 2.1 The primary aim of this EMMP is to detail the mitigation and management to be enacted for the benefit of ecological features identified within or within the vicinity the Site.
- 2.2 The overarching objectives for the mitigation and management detailed in this EMMP are derived from the following sources, as stated within the condition itself:
- Chapter 12 of the Environment Statement (dated July 2016) and its appendices, and the Environment Statement's subsequent addendum submitted in support of the OPP;
 - Ecological Mitigation and Management Plan -Phase 1 (Bioscan ref: E1585/EMMP/P1/R2/rev2) submitted in support of the OPP;
 - Ecological Surveys Scoping Proposal: Reserved Matters Areas 1,2,6,7,8 and 9 (Bioscan ref. E1585R2/Scope/P1/V2)
 - Ecological Surveys Scoping Proposal: Phase 1 and Sports Hub Phase (Bioscan ref: E1585R1/Scope/P1/V2)
 - Landscape and Ecological Management Plan – Phase 1 (David Jarvis Associates ref: 2898-5-4-LM-0001-S5-P6)
 - Construction Environmental Management Plan (CEMP) Development Phase 1 (Phase Wide) (Stantec ref 25216/CEMP – Phase 1, dated September 2021)
- 2.3 The Phase 1 EMMP recommended the following:
- Derogation licences are required to be sought for works involving great crested newts and hazel dormouse where necessary;
 - SuDS features, which will include open swales, are to be incorporated into the scheme in order to increase the quality of surface water discharge, and to provide additional features for great crested newts and for foraging bats;
 - The green infrastructure is to be managed for a range of species including for reptiles, [REDACTED] great crested newts and bats;
 - An ecological management plan will be produced; this will include mowing regimes for areas of semi-natural grassland for the benefit of reptiles and cutting regimes for the hedgerows;
 - Bat and bird boxes are to be mounted on new houses;
 - The tree and scrub species for the creation of the landscape buffers will comprise native species of a composition present within the existing woodland and hedgerows;
 - The landscape plan will include fruit/berry bushes to provide an additional foraging resource for [REDACTED] birds;
 - Dormouse compensation areas should be established and managed appropriately.

2.4 The key objectives of this EMMP specific to the Site are to:

- Detail avoidance and mitigation measures for ecological features identified in association with the Reserved Matters Area;
- Ascertain the requirement and scope of long-term protection measures for habitats and species to be protected;
- Ensure the scheme aims to retain connected and permeable habitats to allow wildlife dispersal across Phase 1 and the wider Site;
- Recommend measures to achieve an overall improvement of retained habitats post-development, such as sensitive planting regimes;
- Provide recommendations for bespoke measures to minimise disturbance and impacts upon protected species and supporting habitats post-development, such as public information resources;
- Detail a compliance and reporting schedule to be implemented long-term.

General Management Principles

- 2.5 Any tree surgery works shall be undertaken by a suitably qualified arboricultural contractor, registered with the Arboricultural Association.
- 2.6 All tree surgery works shall be undertaken in accordance with the requirements of BS 3998:2010 'Tree work - Recommendations'.
- 2.7 All pruning/removal works to existing vegetation, including trees, should be undertaken outside of the bird-nesting season to ensure nesting birds are not disturbed. For clarification, the bird-nesting season is taken to be March to August inclusive. Where this is not possible, an ecologist will need to check for nesting birds prior to commencement of works.
- 2.8 All trees and dense scrub/shrub areas to be retained are to be protected throughout the duration of the construction works in accordance with the prescriptions set out in the arboricultural assessment to meet the criteria of BS 5837:2012 Trees in relation to Construction.
- 2.9 Where tree surgery is planned as part of this management plan or in the situation where an approved tree surgeon has recommended remedial work for health and safety reasons, the potential for bats to be present must be considered before work is carried out.
- 2.10 All new planting will be maintained in accordance with good horticultural practice to ensure the thriving of individual species.
- 2.11 All new/replacement planting will be conducted into well-prepared ground and follow good horticultural practice. All new native transplants should be protected with proprietary rabbit guards or shrub shelters.

- 2.12 Sufficient watering will be undertaken by the contractor to establish and maintain healthy plant growth.
- 2.13 New ornamental shrubs, hedges and herbaceous plants will be pruned in order to maintain attractive form as appropriate to their species.
- 2.14 Peat-based composts will be avoided wherever possible. All plants will be maintained in a disease and pest free state. In most instances, 'natural' methods of pest control are to be undertaken prior to any chemical application. In the event that natural methods of eradication are unsuccessful, plants will be treated through the application of a suitable proprietary herbicide/pesticide.
- 2.15 All trees and shrubs will be monitored for any sign of defects or poor health annually or after severe weather. Any signs of ill health or damage will be noted and remedial action when required.
- 2.16 Tree shelters, stakes, ties and guards will be checked annually for adjustment and/or replacement/removal as required.
- 2.17 Areas of shrub/tree planting with a bark mulch layer will be topped up annually in the spring to retain moisture and limit weed growth, to a nominal depth of 50-75mm.
- 2.18 All formal planting areas will be kept tidy and free from weeds, trimmings, debris and litter. Weeds should be removed by hand unless where it is unfeasible; whereby weeds can be treated by the application of a suitable proprietary herbicide.
- 2.19 Any hard surfacing adjacent to management areas are to be protected from damage by machinery including mowers, with surface debris swept after each visit.
- 2.20 The appointed management company are to keep records of all visits undertaken and the operations carried out on each visit.
- 2.21 Records are to be kept in one location, and copies are to be made available for inspection by the Local Planning Authority.

3.0 BASELINE ECOLOGICAL INFORMATION

Previous Surveys

- 3.1 Historic surveys related to Phase 1 of the development commenced from 2010 and are summarised below. Full survey reports have been previously submitted to Horsham District Council in support of Outline Application DC/16/1677 and are available on the Council's planning application webpage.
- 3.2 This EMMP, which is specific to the Site, has been prepared based upon previous ecological findings as summarised below, with the exception of the following ecological surveys:
- Update site walkover (2nd July 2026), preliminary ecological appraisal (Appendix D)
 - Bat preliminary roost assessment of buildings (2nd July 2026), (Appendix E)
 - Emergence surveys (July to August 2026)
- 3.3 The walkover survey was undertaken using UKHabs methodology by Theresa Stewart MCIEEM, and William Campbell.
- 3.4 In addition to the above, biological records were obtained from Sussex Biodiversity Records Centre (SxBRC) and reviewed in preparation for this EMMP.

Ecological Constraints

- 3.5 The update ecological walkover conducted in July 2026 confirmed habitats within the Site and those which hold the potential to support protected species as summarised below. All references to habitat parcels are made in accordance with the RMA 11 Moat House Habitats Plan (CSA/8141/106) which can be viewed in Appendix B.
- 3.6 The Site comprised three buildings, a farmhouse (MH1), triple garage with annexe flat (MH2) and an outbuilding (MH3), with associated hard standing driveway and pathways. The garden of the property comprised a modified grassland lawn (Field F1), with scattered trees and two non-native ornamental hedgerows (H3 & H4) to the front of the property MH1 and scrub forming a vegetated garden strip to the rear of MH1. Outside the redline boundary a moat (Pond P5) formed the perimeter of the property with vegetated banks comprising tall ruderal vegetation, scattered scrub and mature tree lines.

Bats

- 3.7 Bat surveys on the wider application site between 2011 and 2017 by Bioscan have identified the presence of the at least nine bat species comprising common pipistrelle soprano pipistrelle, Myotis sp., noctule,

serotine, Nathusius' pipistrelle, Daubenton's bat, Natterer's bat, long-eared bat and barbastelle (Bioscan, 2018). All the above species have been recorded within Phase 1. In 2016 trees subject to removal were subject to tree climbing assessment of bat roost presence. No bat tree roosts were identified.

- 3.8 Two of the three buildings within the Moat House Site were found to support roosting bats as a result of building inspections and emergence/re-entry surveys undertaken in 2009, 2011, 2014, 2015, 2018 by Bioscan (Bioscan 2016 & 2020). These buildings comprise the farmhouse MH1 which was found to support long-eared bats and common pipistrelles, and the triple garage MH2 which was found to support common and soprano pipistrelles.
- 3.9 The gardens, ornamental hedgerows and scrub within the Site, provide suitable foraging and commuting routes for bats as confirmed by historic activity surveys (Bioscan, 2020). Additional suitable habitats which fall outside the Site boundary but lie in close proximity comprise the moat and associated treelines and bank side vegetation which were confirmed as foraging resources for bats during historical surveys and during the first and second bat emergence surveys undertaken by CSA Environmental in 2026 (Appendix E, update interim bat report).
- 3.10 There are eight trees within the site, comprising, ash *Fraxinus excelsior*, field maple *Acer campestre*, pedunculate oak *Quercus robur*, cherry plumb, *Prunus* sp. with scattered scrub species goat willow *Salix capra*, and blackthorn *Prunus spinosa* also present.
- 3.11 A full Ground-level Tree Assessment (GLTA) has not been carried out in 2026 by CSA Environmental, however the walkover assessment in 2026 did not identify any mature trees within the Site considered to offer suitability to support bat roosts.

3.12

Hazel Dormice

- 3.13 Dormouse surveys undertaken within Phase 1 in 2014 and dormouse were identified along the lower reaches of Chennells Brook (in the south-east corner of Phase 1).
- 3.14 There is no suitable habitat on Site to support *Muscardinus avellanarius*. The trees and scrub to the far side of the surrounding moat pond have potential to support dormice, however due to the site being surrounded by a live construction site with no arboreal connection to the wider

landscape, this substantially reduces the likelihood of dormice being present within the Site. Therefore, the presence of dormice is considered unlikely and they have been scoped out of further consideration.

Birds

- 3.15 Breeding bird surveys undertaken by Bioscan in 2014 noted four breeding bird territories for house sparrow within the Moat House Site.
- 3.16 This correlates with the 2nd of July 2026 walkover findings as house sparrows were recorded nesting within the farmhouse building MH1. In addition, mallard *Anas platyrhynchos* and moorhen *Gallinula chloropus* were observed using the moat and adjacent areas of short grassland for foraging.

Great Crested Newt

- 3.17 Great crested newt surveys have been undertaken on the wider application site since 2010, with great crested newt presence confirmed within ponds within 500m of the Site. In 2014 the Moat pond P5 surrounding the site was found to support great crested newts. Since then, water samples testing for great crested newt DNA were undertaken on P5 in 2019, 2022, 2025, and 2026, these all came back negative for great crested newts.
- 3.18 A number of great crested newt licences have been implemented across the wider application site, including two within 250m of the Site to the north and north west.
- 3.19 Suitable terrestrial habitat for great crested newt within the Site was limited to the hedgerow bases, construction equipment storage areas, and the moat (P5) banks at the site perimeter. Update water samples of ponds were undertaken in 2026 by CSA Environmental to test for great crested newt environmental DNA (eDNA) within the water body. The moat (P5) and recently created water retention basins P54 and P55 came back as negative for great crested newt DNA (although eDNA samples for ponds P54 and P55 were taken outside the guideline survey time which is up to the end of June. They were carried out on 16th July 2026 by William Campbell as an accredited agent under Theresa Stewart's great crested newt level 1 Natural England class licence reference 2025-83853-SCI-CL08).
- 3.20 On 27th July 2026 a great crested newt and a frog were discovered by landscape maintenance staff under a paving slab within the south of the Site boundary.

Reptiles

- 3.21 Reptile surveys undertaken in 2014 and 2015 by Bioscan within Phase 1 identified the field margins as suitable habitat and one slow worm and

one common lizard were identified associated with a field margin in the south east of Phase 1.

- 3.22 Habitat suitable for reptiles on Site is largely restricted to the moat margins, where the grass sward is longer and scattered scrub provides potential refuge. Construction materials located to the west of building MH2 may also offer sheltering opportunities for reptiles. Habitat connectivity is limited, as the Site is located within the centre of an active construction site and is largely isolated from surrounding suitable habitat. Consequently, the presence of reptiles on Site is considered unlikely.

Invertebrates

- 3.23 A notable invertebrate species assemblage was recorded within surveys of the wider site in 2015 and 2016; however, full survey reports were not available at the time of writing. The presence of notable species within the Site, therefore, cannot be discounted. The habitats adjacent to the site comprising the moat pond and bankside vegetation offer suitable invertebrate habitat.
- 3.24 No invertebrate surveys are proposed on the Moat House site in 2026. A single invertebrate scoping visit was made to the adjacent Phase 2 area, on 16th June 2026 by Invertebrate Ecologist Scotty Dodd MSc MCIEEM MRES on behalf of CSA Environmental. The remit for the visit was to assess the potential for important invertebrate assemblages and notable and S41 invertebrates. Five notable species were recorded, three spiders, a weevil and a beetle. The Phase 2 area supports a reasonable diversity of predominately widespread and common invertebrate species associated with hedgerows and trees hedgerow bases and woodland edge. No habitats or resources were noted that had the potential to support important invertebrate assemblages (Scotty Dodd, July 2026).

4.0 AVOIDANCE, MITIGATION AND COMPENSATION

Identified Impacts

- 4.1 Reserved Matters Area (RMA 11 Moat House) relates to the proposed development which is expected to deliver 11 residential units and associated infrastructure, which is to include the following:
- The demolition of buildings MH2 and MH3
 - Losses to existing modified grassland to accommodate the footprint of buildings and hardstanding
 - The loss of a blackthorn and goat willow at the entrance of the site and a small number of other scattered scrub plants
 - The retention of the trees on site
 - Planting of 10 specimen trees on site
 - The installation of ornamental hedgerows around the Site.
- 4.2 An iterative process regarding the masterplan for RMA 11 was employed with input from the Project Ecologist to ensure that avoidance, mitigation, and compensation measures have been incorporated into the scheme. Detailed landscaping proposals for the Site have been produced by David Jarvis Associates (Drawing ref: 2898-5-2-35-DR-0001-S5-P5 Moathouse GENERAL ARRANGEMENT) which should be viewed in conjunction with the mitigation and management prescriptions set out herein and the Phase 1 wide EMMP (Bioscan, 2020).

Avoidance, Mitigation and Compensation

- 4.3 The construction phase of the development of the Site risks causing disturbance and harm to protected species comprising bats, birds, great crested newts and reptiles though the direct removal of supporting habitat and indirect associated effects. As such, detailed avoidance, mitigation and compensation measures are detailed below:

Grassland

- 4.4 As per the proposal layout for the Site (Drawing Ref: Drawing ref: 2898-5-2-35-DR-0001-S5-P5 Moathouse GENERAL ARRANGEMENT), most of the existing modified grassland within the site will be lost. With two areas of modified grassland retained in the centre of the Site and some maintained around the edges of the Site.
- 4.5 This habitat will be managed based on the prescriptions detailed herein and within the phase wide Landscape and Ecological Management Plan (LEMP) which has been produced relating to the entire Phase 1 area by David Jarvis Associates (Landscape and Ecological Management Plan – Phase 1, September 2021) and the Moat House area LEMP compliance statement (David Jarvis Associates, 2026).

Hedgerow

- 4.6 The two ornamental hedgerows on Site will be lost and a number of ornamental hedgerows will be planted around the Site under the landscaping proposals for the Site.
- 4.7 A sensitive management regime for the new ornamental hedgerows, as detailed herein, will also act to improve the ecological function of retained hedgerows within the Site and provide suitable nesting habitat for nesting birds.

Individual Trees

- 4.8 Individual trees around the Site boundaries and an ash in the centre of the Site are to be retained within the Site as identified by the arboricultural survey in 2026 (David Jarvis Associates, 2026).
- 4.9 Where mature trees are to be retained, standard root protection areas (RPAs), protective fencing and ground protection will be implemented in accordance with BS 5837:2012, ensuring all trees are protected and safeguarded throughout all stages of development.
- 4.10 New tree planting is proposed within the current scheme of development the Site which will be subject to a suitable management regime as detailed herein.

Bats

Commuting/Foraging Opportunities

- 4.11 The edges of the Site linked to the moat P5 are being retained and will continue to offer suitable foraging and commuting habitat for bat species. To avoid the disturbance to retained foraging/commuting habitats, appropriate sensitive working measures and lighting strategies will be implemented during construction, including limiting construction activities to daylight hours and restricting the use of security lighting at night.
- 4.12 A sensitive lighting scheme has been designed for the operational phase comprising bollard lighting to minimise light spill on to the surrounding moat pond habitat and ornamental trees and ornamental hedgerows.

Roosting Opportunities

- 4.13 The existing three buildings on site offer suitability to support bat roosts, building MH1 will be retained and the hanging tile features. No trees within the site boundary were considered to have suitability to support bat roosts. However, should works be proposed to trees then a check for potential roost features prior to works commencing will be required.

Great Crested Newts

- 4.14 The moat pond P5 surrounds the Site and two water retention ponds are located immediately north west of the moat (P54 and P55), although

negative for GCN eDNA in 2026, they have the potential to support GCN alongside the terrestrial habitat on Site comprising vegetated moat banks, bases of the ornamental hedgerows and sheltering places beneath stored construction materials.

- 4.15 As a great crested newt was found on Site on 27th July 2026, a protected species licence is likely to be required from Natural England to allow Site construction works to commence.
- 4.16 The licence will include a method statement outlining steps to minimise harm to great crested newts, where present. This will include appropriate timing of the works and habitat manipulation to minimise the risk of harm to great crested newts should they be present. Works which will affect likely newt hibernacula may only be undertaken during the active period for amphibians (generally mid-February to mid-October).
- 4.17 Retained and created ponds will continue to provide appropriate habitat for great crested newt within the wider area of the Phase 2 scheme. Additional compensatory ponds have been included within the Hillside area of development, to compensate for the loss of suitable great crested newt habitat within Phase 2 of the development and contribute to the wider metapopulation of great crested newt pond provision within the wider site.
- 4.18 On the Moat House Site, two hibernacula are proposed as compensatory habitat to provide suitable shelter for the great crested newt.

Reptiles

- 4.19 Historically, no reptiles have been identified within the Moat House Site. However, historically within Phase 1, one slow worm and one common lizard were identified associated with a field margin in the south east of Phase 1 (Bioscan, 2020).
- 4.20 Two hibernaculum are proposed which will provide suitable habitat to support reptiles.

4.21

4.22

4.23

[REDACTED]

4.24

[REDACTED]

4.25

[REDACTED]

Birds

4.26 Habitat management and maintenance of suitable nesting habitat including hedgerows and mature trees should be undertaken outside of the nesting season (March to August inclusive).

4.27 Habitat enhancement with the provision of additional trees and scrub/shrub planting will aim to provide foraging and nesting opportunities for a range of bird species.

4.28 Bird nesting provision will be provided within off Site bird boxes located on trees to the west of the Site (Appendix C).

Invertebrates

4.29 The development of the Site may provide an increase in opportunities for invertebrates through the enhancement of the existing hedgerow and the provision of additional trees and scrub/shrub planting.

4.30 An Update invertebrate scoping survey was conducted in Spring 2026 within the Phase 2 and phase 3 areas, to ascertain the likelihood of important invertebrate assemblages will be used to ascertain the need for any species-specific mitigation measures.

5.0 ENHANCEMENT AND MANAGEMENT PRESCRIPTIONS

Protected Species

5.1 As discussed above and indicated by the landscape proposals (David Jarvis Associates, July 2026) the following will be implemented into the post-development design to mitigate for the loss of habitat with the potential to support protected species:

- Retention and management of retained trees.
- Creation of areas of amenity grassland and planted beds.
- Creation of ornamental hedgerows across the Site.
- Additional planting of 11 individual trees.
- Installation of two hibernaculum.
- Provision of bat and bird boxes on the new properties.

5.2 See Appendix C for the Mitigation and Enhancement Plan detailing the positioning of the above provisions.

5.3 A Construction Environmental Management Plan (CEMP) has been prepared to cover Phase 1 to satisfy Condition 9:

Pre-Commencement Condition: Prior to the commencement of development (other than the accesses hereby permitted) on any Phase of development a Construction Environment Management Plan covering that Phase shall be submitted to and approved by the Local Planning Authority. The Phase-Wide CEMP shall include, but not be limited to, the following details:

- a) the phased programme of demolition and construction works*
- b) routing of vehicles to and from the site during construction*
- c) erection and maintenance of security hoarding*
- d) the provision of road sweepers, wheel washing facilities and the type, details of operation and location of other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),*
- e) details of public engagement both prior to and during construction works, including a named person to be appointed by the applicant to deal with complaints who shall be available on site and contact details made known to all relevant parties*
- f) measures to reduce air pollution during construction including turning off vehicle engines when not in use, plant servicing and transport reduction,*

- g) waste management including prohibiting burning of construction waste,
- h) measures to prevent the discharge of water or other substances to ground or surface waters without the prior written approval of the Environment Agency

Thereafter the approved CEMP shall be implemented and adhered to throughout the entire construction period of the relevant Phase.

Reason: As this matter is fundamental in order to consider the potential impacts on the amenity of the surrounding environment and residents during construction and in accordance with Policy 33 of the Horsham District Planning Framework (2015).

5.4



- 5.5 Habitat management and enhancement specifics are provided below per habitat type and incorporated within the Phase 1 Landscape and Ecological Management Plan (LEMPs) approved under Conditions 35.

Individual Trees

- 5.6 Most trees within the Site redline are being retained. Additional trees will be planted within the Site.

Objectives

- 5.7 Appropriate protection measures to preserve the health of retained mature trees.
- 5.8 New tree and shrub planting to provide structure, colour and seasonal interest and create an attractive setting for the new development and soften the built environment.
- 5.9 Select suitable species, where appropriate, to maximise benefits for wildlife.

Management Prescriptions

- 5.10 Prior to construction, protective features in line with BS 5837:2012 will be installed to demarcate the root protection area (RPA) of each retained mature tree.
- 5.11 The detailed landscape proposals set out formal planting for each development parcel. Native trees, shrubs and herbaceous plants have been considered where appropriate to provide benefit for wildlife e.g. pollinating insects, foraging birds, etc.

- 5.12 All shrub/tree planting should be conducted into well-prepared ground, of pre-prepared beds consisting of topsoil to a depth of no less than 300mm, mixed with appropriate soil conditioner.
- 5.13 All planting should be maintained in accordance with good horticultural practice in order to ensure the thriving of individual species. Shrubs, hedges and herbaceous plants will be pruned in order to maintain attractive form as appropriate to their species.
- 5.14 Avoid the use of peat-based composts and minimise the use of the pesticides in the implementation and maintenance of any landscape scheme.
- 5.15 Inspect stakes and ties to trees and shrubs, twice yearly or after severe weather. Test for soundness in early and late winter, and replace tight or ineffective ties. Ties should be replaced in slightly different position. Remove stakes and ties as soon as trees are self-supporting to benefit tree establishment. Ensure that stake(s) are wholly removed from the ground and that the remaining hole is filled with clean topsoil.
- 5.16 Re-firm trees in ground after strong winds, frost heave or other disturbances.
- 5.17 Trees should be routinely inspected for pests and diseases.
- 5.18 Crown prune young trees by removing dead branches and reducing selected side branches, ensuring development of a single strong leader. Pruning should be carried out in accordance with BS 7370-4.
- 5.19 Maintain a mulch layer at the base of all trees and to all shrub beds by regular topping up to a depth of 75mm.

Non Native Hedgerows

New Hedgerows

- 5.20 Hedgerow planting is proposed throughout the Site. Planting will comprise ornamental and cultivar species.

Objectives

- 5.21 To provide screening, structure and visual interest within the proposed landscape scheme.
- 5.22 Dead wood will be kept on site to form log piles within the margins of the moat pond to form habitat that can be used by saprophytic organisms and hibernating fauna.

Management Prescriptions

- 5.23 New planting of hedgerows will be conducted into well-prepared ground.

- 5.24 New hedgerows will be monitored annually for good health with failed transplants replaced as appropriate.
- 5.25 Lateral growth of new hedgerows should be pruned annually in October in initial years after planting to encourage bushy growth. Once established, hedgerows will be managed with an annual cut in January or February.

Amenity Grass Areas

- 5.26 Amenity grassland areas are proposed around the Site.

Objectives

- 5.27 To provide an attractive setting for the surrounding residential area.

Management Prescriptions

- 5.28 Establish and maintain all amenity grassland areas/verges to a height of between 25mm and 35mm by cutting as necessary through the growing season. In practice, cuts every 2 – 3 weeks are likely to be required. Cuttings are to be removed at the first cut of the season, with arisings spread evenly over the cut area at all other times.
- 5.29 Where grass areas have become worn or have failed to establish, areas should be over-seeded with appropriate grass seed of a similar mix.

6.0 ECOLOGICAL MONITORING PROGRAMME

- 6.1 A programme of monitoring has been proposed in order to assess the efficacy of proposed landscaping and management works in increasing biodiversity and opportunities for local wildlife at the Site. This monitoring will also ensure that management is being undertaken in accordance with prescriptions set out herein.
- 6.2 It is proposed that a five-year timeframe would provide a reasonable opportunity to detect habitat/species changes and to therefore allow any remedial action to be taken.
- 6.3 As per the Phase 1 EMMP (Bioscan, 2020), the following ecological surveys will be conducted to ascertain the future use of the habitats within Phase 1 including RMA 11 Moat House:
- Road verges and wildflower planting areas
 - walkover surveys in years 1 and 5 after the planting has been carried out to determine how growth is progressing
 - Hedgerow inspection
 - Walkover surveys in Years 1, 3 and 5 to determine planting success and identify requirement for remedial action, such as filling gaps or replacing failed whips
 - Bat activity surveys. Three seasonal bat activity surveys (broadly undertaken in spring, summer and autumn) within the Phase 1 area will be carried out in the first year of occupation (Year 1), and thereafter in Year 3 and 5 to assess the usage of the site by foraging and commuting bats.
 - Bat boxes (tree mounted). Annual checks of bat boxes for evidence of bats to be undertaken in November/December during Year 3 and Year 5 by a licenced bat ecologist. Concurrently, the state of the boxes and brackets will be checked, and replaced if damaged or are showing signs of wear.
 - Bird boxes (tree mounted). These will be cleared of nest debris annually for the first five years in November/December.
 - Concurrently, the state of the boxes and brackets will be checked, and replaced if damaged or showing signs of wear.
 - SuDS features. Walkover surveys of these features following their construction will be carried out, and then in Years 1 and 2 following this to ensure that the marginal planting has taken successfully (appropriate remedial action to be taken if not).
 - Hibernacula. The hibernacula will be checked during the walkover surveys in Years 1 and 2 after creation. However, they will not be dismantled to facilitate the surveys to avoid disruption to wildlife, so the monitoring will just investigate any easily accessible small animal signs.

Reporting and Remedial Actions

- 6.4 In order to provide a standardised monitoring report, an Ecological monitoring Form Template will be completed on each monitoring visit in order to allow information and recommendations to be disseminated effectively.
- 6.5 It is proposed that the completed monitoring form and summary text will be sent via collective email communications to the following parties for their information and to make any relevant comments:
- Developer and/or the third party management company
 - Sussex Biodiversity Record Centre
 - Any local interest groups/forums
- 6.6 Where monitoring highlights any negative trends, or where the above parties have concerns over the result of monitoring, remedial action will be triggered to ensure any required changes to management. It is proposed that, as the local planning authority, Horsham District Council may enforce any remedial action in consultation with the relevant parties. This could include some of the following actions:
- Change in habitat management where habitat degradation occurs
 - Compensatory measures for habitat damage/loss, and/or
 - Further monitoring requirements

7.0 WORK SCHEDULES

- 7.1 A schedule of work is provided in the following tables (1-2), giving a timetable for management actions for the first fifteen years. Before the end of this Management Plan period the management company will review these prescriptions, in consultation with interested parties and provide an updated Management Plan for on-going management.

Table 1. Habitat Management Prescriptions

	Feature	Initial works	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6 - 15
A	Retained Trees	-	Inspect trees in year 2 and 12 and remove poor specimens through selective thinning. Inspection also after severe weather for damage.					
B	New Hedgerows	Allow developing hedges to attain planned height thereafter maintain with an annual cut.	-	Trim lateral growth.	Trim lateral growth.	Trim lateral growth.	Maintain height with annual cut in Jan – Feb.	Maintain height with annual cut in Jan – Feb.
		Maintain base of hedgerow free from weeds by application of 75mm layer of mulch. Top up annually and spot treat any weed growth.	Immediately following planting.	Top up mulch (Sept).	Top up mulch (Sept).	Top up mulch (Sept).	-	-
		Monitor and replace failed planting with appropriate species.	November – March.	-	-	-	-	-
		Monitor growth of thicket and maintain at planned extents.	-	-	-	Biannually		Biannually
C	Amenity Grass	Cut to a height of 50mm, and then every two weeks (remove cuttings). Final cut after flowering to 50mm. Water as necessary during the summer.	First cut after mowing to a height of 25-50mm, and then every two weeks	Cut to a height of 25-50mm, with regular cuts throughout the growing season. Over sow as necessary following final cut and cuttings removed (annually)	Cut to a height of 25-50mm, with regular cuts throughout the growing season.	Cut to a height of 25-50mm, with regular cuts throughout the growing season.	Cut to a height of 25-50mm, with regular cuts throughout the growing season.	Cut to a height of 25-50mm, with regular cuts throughout the growing season.

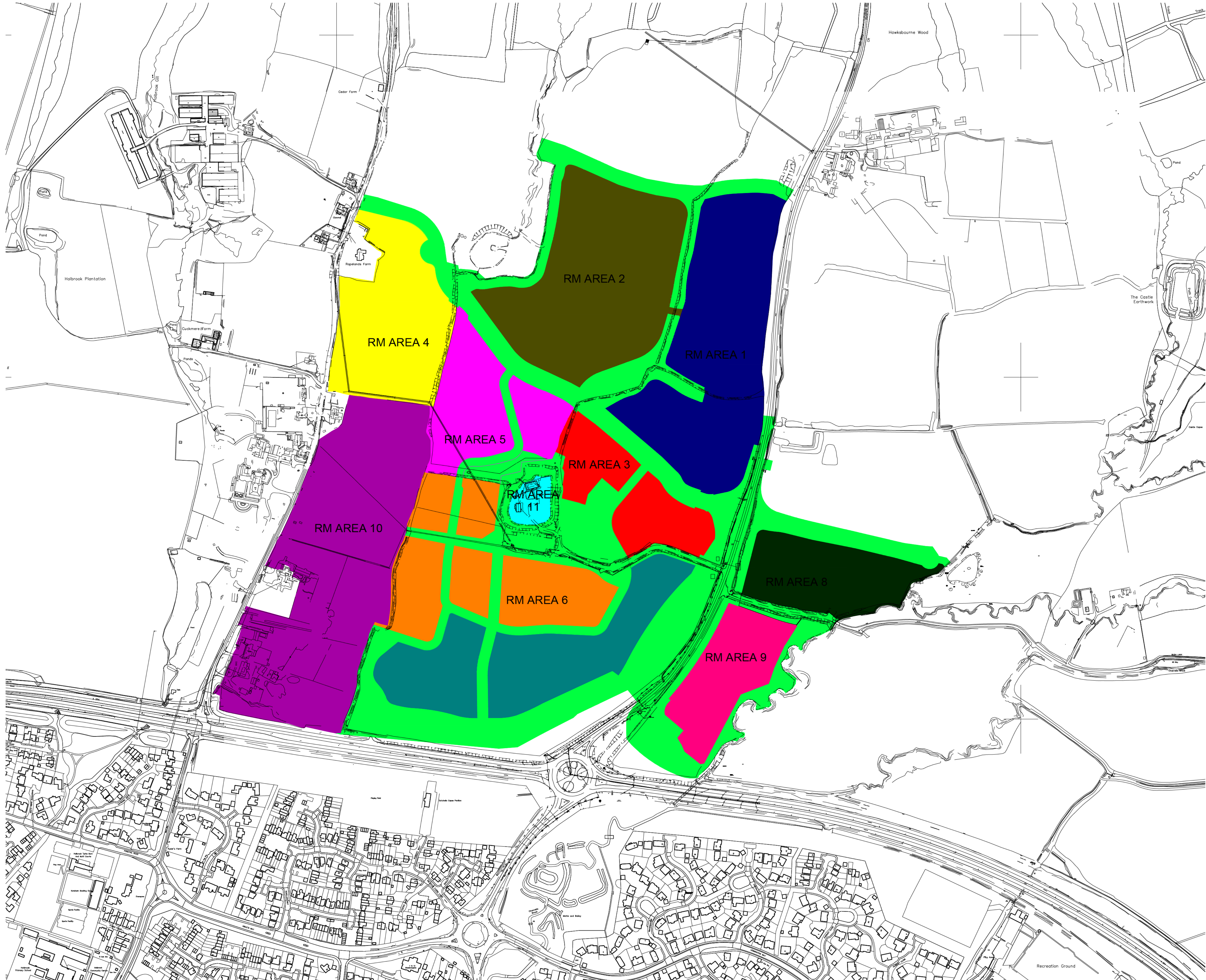
D	Tree Planting	Inspect stakes and ties, twice yearly. Test for soundness in early and late winter and replace tight or ineffective ties. Remove stakes and ties as soon as trees are self-supporting	Annually and after severe weather	Annually and after severe weather	Annually and after severe weather	Annually and after severe weather		
		Routinely inspect trees for pests and diseases.	As required.					
		Maintain a layer of mulch to a depth of 75mm.	Annually.					
E	Ornamental Trees and Shrubs	Initial Planting	Maintain in accordance with good horticultural practice. Prune shrubs, hedges and herbaceous plants in order to maintain attractive form as appropriate to individual species.					

Table 2. Ecological monitoring Schedule

	Feature	Initial works	Year 1	Year 2	Year 3	Year 4	Year 5
A	Hedgerows	-	Walkover survey of newly planted hedgerows to identify any remedial action needed or changes to management regime.	-	-	-	Walkover survey of hedgerows to identify any remedial action needed or changes to management regime.
	Road verges and wildflower areas		Walkover survey of road verges, amenity and wildflower areas to identify any remedial action needed or changes to management regime.				Walkover survey of road verges, amenity and wildflower areas to identify any remedial action needed or changes to management regime.
B	Reporting	-	Monitoring proforma to be completed submitted to management company with any recommendations in changes to management regime. Species records to be submitted to Sussex Biodiversity Records Centre / Sussex Bat Group.	-	Monitoring proforma report to be completed submitted to management company with any recommendations in changes to management regime. Species records to be submitted to Sussex Biodiversity Records Centre / Sussex Bat Group.	-	Monitoring proforma report to be completed submitted to management company with any recommendations in changes to management regime. Species records to be submitted to Sussex Biodiversity Records Centre / Sussex Bat Group.

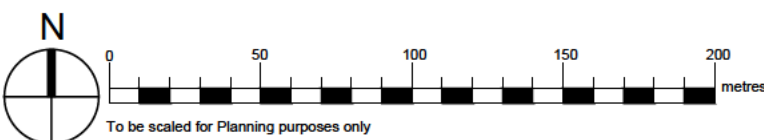
Appendix A

Phase 1 Reserved Matters Area Plan



Contractors and consultants are not to scale dimensions from this drawing

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KEY

- RM AREA 1
- RM AREA 2
- RM AREA 3
- RM AREA 4
- RM AREA 5
- RM AREA 6
- RM AREA 7
- RM AREA 8
- RM AREA 9
- RM AREA 10
- RM AREA 11
- INFRASTRUCTURE
APPROVAL AREAS*

* The areas benefiting from existing full consent or existing / pending approval through RM submissions and will not contain any Housing Units

Revision	Date	Description
C	21-03	
D	23-10	Boundary RMS and RME amended to move north of culvert
E	23-10	RM 5 and RM6 boundary amended
F	23-11	Boundary of EWG and Community Centre removed
G	26-02	Boundary RM11 added
H	26-04	Boundary RM11 amended

BroadwayMalyan^{BM}

4 Pear Place
London
SE1 6BL
United Kingdom

T: +44 (0)20 7261 4200
F: +44 (0)20 7261 4300
E: Lon@BroadwayMalyan.com

www.BroadwayMalyan.com

Client
Legal & General

Project
Land North of Horsham

Description
**Reserved Matters Areas Plan
(Condition 7)**

Status
Planning

Scale	Drawn By	Date
1:2500@A1	AK	April 2026
Job Number	Drawing Number	Revision
34854	S19	H

Appendix B

MA11 Moat House – Habitats Plan (CSA/8141/106)

Appendix C

RMA11 Moat House Mitigation and
Enhancement Plan (CSA/8141/108)



Appendix D

Update PEA report

Preliminary Ecological Appraisal

July 2026

**Phase 1 – Mowbray, Moat
House,
North Horsham**

Prepared by
CSA Environmental

On behalf of Legal and General
(Strategic Land North Horsham) Ltd

This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

Report Reference	Revision	Date	Prepared by	Approved by	Comments
CSA/8141/01	-	16/07/2026	WC	TS	First Draft



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EXECUTIVE SUMMARY

Residential development of 11 units and associated infrastructure is proposed at Moat House, North Horsham. CSA Environmental was instructed by Legal and General (Strategic Land North Horsham) to undertake an update Preliminary Ecological Appraisal (PEA) of the Site to inform the reserved matters application.

CSA Environmental undertook a desk study and field survey of the Site in July 2026, including a UK Habitat Classification survey.

The Site comprised three buildings, a farmhouse (MH1), triple garage with annexe flat (MH2) and an outbuilding (MH3), with associated hard standing driveway and pathways. The garden of the property comprised a modified grassland lawn, two ornamental hedgerows, buildings, hardstanding, scattered trees and scrub. A moat (Pond P5) formed the perimeter of the property and was outside the red line.

The proposals include the demolition of buildings MH2 and MH3, conversion and extension of MH1 and construction of residential properties within the modified grassland garden. The majority of trees will be retained on site with additional trees planted within current landscape proposals.

No international statutory designated sites were identified within 10km of the Site. No statutory or non-statutory nature conservation designations occur within the Site. One national statutory designation, Warnham SSSI is located 1.4km north-west of the Site. One local statutory designation Warnham LNR is located c. 1.4km south west of the Site.

The site is considered to have suitability to support roosting bats, nesting birds. In addition, the moat pond P5 adjacent to the Site was found to be negative for great crested newt DNA in 2026, however as there are positive results for GCN in ponds within the wider landscape and an individual great crested newt was found on site in July 2026, a great crested newt mitigation licence from Natural England may be required for site works to proceed.

Bat roosts have been identified in two buildings on site, therefore a European protected species licence for bats will be required for buildings MH1 and MH2 to allow the development to proceed.

Further ecological work is recommended, including bat emergence and re-entry surveys, which are ongoing and will inform the licence application, a ground level tree assessment for bat roost potential, precautionary measures for nesting birds and reptiles, **and great crested newt.**

1.0 INTRODUCTION

- 1.1 This report has been prepared by CSA Environmental on behalf of Legal and General (Strategic Land North Horsham)Ltd. It sets out the findings of a Preliminary Ecological Appraisal (PEA) of Moat House, North Horsham (hereafter referred to as 'the Site'). This appraisal is being undertaken to update historical ecological survey work at the Site to inform the reserved matters application, as detailed below:
- 1.2 "Application for approval of Reserved Matters (layout, scale, appearance, means of access and landscaping) pursuant to Condition 5 of Outline Planning Permission reference DC/16/1677 for RM Area 11 comprising demolition of existing garage and outbuilding and provision of 11 residential (C3) units, including single storey side extension to existing dwelling and conversion into 2 residential units and car and cycle parking, drainage, internal roads, landscaping and associated infrastructure."
- 1.3 The scope of this appraisal has been determined with due consideration for best-practice guidance provided by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017), and to the *Biodiversity: Code of practice for planning and development* (BS 42020:2013) published by the British Standards Institution (2013).
- 1.4 The Site occupies an area of c. 0.7ha and is located around central grid reference TQ 18789 33824, to the north of Horsham. The Site comprises, three buildings, a farmhouse, two outbuildings, gardens and driveway. Outside the site, the perimeter is formed by a treelined moat waterbody P5 (see Habitats Plan in Appendix A).
- 1.5 This PEA aims to:
 - Characterise baseline ecological conditions of the Site and its wider context
 - Identify any ecological constraints to development of the Site
 - Inform scheme design
 - Identify further ecological surveys and investigation necessary to inform a full Ecological Impact Assessment (EclA) of the Site
 - Highlight opportunities for ecological enhancement
- 1.6 To achieve these aims, an ecological desk study and field survey were undertaken of the Site, the findings of which are presented herein.
- 1.7 As set out in best practice guidelines (CIEEM, 2017) a PEA is typically only suitable for planning submission where there are no ecological constraints relating to the project. Where ecological constraints are identified, such as the presence of important ecological features, the effects of development on these features should be assessed within a separate EclA report, which would supersede the PEA.

2.0 LEGISLATION, PLANNING POLICY & STANDING ADVICE

Legislation

- 2.1 Legislation relating to wildlife and biodiversity of particular relevance to this PEA includes:
- The Conservation of Habitats and Species Regulations 2017 (as amended)
 - The Wildlife and Countryside Act 1981 (as amended)
 - The Natural Environment and Rural Communities (NERC) Act 2006
 - The Protection of Badgers Act 1992
 - The Environment Act 2021
- 2.2 This above legislation has been addressed, as appropriate, in the production of this report. Further information on the above legislation is provided in Appendix B.

National Planning Policy

- 2.3 The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities & Local Government, 2024) sets out the government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Further details are provided in Appendix B.
- 2.4 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their effects within the planning system.

Local Planning Policy

- 2.5 A number of local planning policies relate to ecology, biodiversity and/or nature conservation. These are summarised in Table 1 of Appendix B. These policies have been addressed, as appropriate, in the production of this report.

Standing Advice

- 2.6 Natural England and Defra's Standing Advice (Natural England & Defra, 2014) regarding habitats and protected species aims to support local authorities and forms a material consideration in determining applications in the same way as any individual response received from Natural England following consultation. Standing advice has therefore been given due consideration, alongside other detailed guidance documents, in the production of this report.

3.0 METHODS

Desk Study

- 3.1 An ecological desk study was undertaken in July 2026 comprising a review of online resources, existing ecological survey reports for the site and biological records centre data as detailed below. A review of historical reports conducted in 2018, 2019 and 2020 from Bioscan and Derek Finnie which enabled a picture of the ecological interest of the Site to be built up.
- 3.2 The Multi-Agency Geographic Information for the Countryside (MAGIC) online database was reviewed to identify nature conservation designations within the following search radii:
 - Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites within 10km of the Site (including possible/proposed sites)
 - Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR), Local Nature Reserves (LNR) within 3km of the Site
 - Other relevant data e.g. Ancient Woodland Inventory within 1km of the Site
- 3.3 A review was undertaken of the location of any such designations, their distance from and connectivity with the Site, and the reasons for their designation. This information was used to determine whether they may be within the proposed development's Zone of Influence (Zoi).
- 3.4 A Phase 1 Habitat Survey has been undertaken across the entire site by Bioscan and the Environment Statement Chapter 12 Ecology (Bioscan 2016) has been referred when compiling this report.
- 3.5 Sussex Biological Records Centre (SBRC) was contacted for details of any non-statutory nature conservation designations and records of protected/notable habitats and species. This information was requested for an area encompassing the Site and adjacent land within c. 2km of its central grid reference. This search area was selected to include the likely zone of influence upon non-statutory designations and protected or notable habitats and species.
- 3.6 Further online resources were reviewed for information which may aid the identification of important ecological features. The Woodland Trust's online Ancient Tree Inventory was reviewed for known ancient or veteran trees within the Site and adjacent land. Interactive online mapping provided by the charity 'Buglife' was used to determine whether the Site falls within an Important Invertebrate Area.
- 3.7 In accordance with Natural England's Great Crested Newt Mitigation Guidelines (2001), a desktop search was undertaken to identify ponds

within 500m of the Site which may have potential to support breeding great crested newts *Triturus cristatus*, using Ordnance Survey (OS) mapping, the MAGIC database and aerial photography.

- 3.8 Where possible under the terms of the data provider, relevant desk study data are presented in Appendix C.

Field Survey

- 3.9 A UK Habitat Classification ('UKHab') survey was carried out in fine and dry weather conditions on 02 July 2026 by Theresa Stewart MCIEEM, FISC Level 4, and Will Campbell encompassing the Site and immediately adjacent habitats that could be viewed.

- 3.10 UKHab is a unified and comprehensive system for mapping and classifying habitats, designed to provide a simple and robust approach to surveying and monitoring, and replaces Phase 1 Habitat survey methods. The method allows for identification of important habitat types, including habitats of Principal Importance under Section 41 (S41) of the NERC Act (2006) and Habitats Directive Annex I habitats. This method also allows for direct translation of habitats into the Statutory Biodiversity Metric (Defra, 2025).

- 3.11 The following parameters were adopted for the UKHab survey undertaken for this PEA:

- UKHab Professional edition (Butcher *et al.*, 2023, commercial End User Licence Agreement (EULA))
- Minimum Mappable Unit (MMU):
 - 10m²/0.001ha (polygons)
 - 5m (linear)
- Primary Habitats recorded to a minimum of Level 2 (see below) with UKHab codes provided
- Mandatory secondary codes used
- Base-mapping comprising a combination of aerial imagery and topographic information

- 3.12 Primary Habitats are recorded to a minimum of Level 2. Where the survey is conducted at an appropriate time of year (e.g. May to July for grassland) habitats may be recorded to Level 3, 4 or 5, only if conditions and the experience of the surveyor allow.

- 3.13 Alongside the UKHab survey, additional field survey information was collected, comprising:

- Detailed floral species lists recorded for each identified habitat/parcel
- Evidence of, or potential for, European Protected Species (EPS) (including bats, great crested newt, dormouse and otter)

- Evidence of, or potential for, other protected species (including birds, reptiles, water vole [REDACTED] and certain invertebrates)
 - Evidence of, or potential for, other notable species (including S41 Species of Principal Importance as well as notable, rare, protected or controlled plants and invertebrates)
 - Any other survey information relevant to ecological matters
- 3.14 Results of the UKHab survey are presented on the Habitats Plan in Appendix A. Appendix D provides photographs of the habitats at the Site and Appendix E provides a list of floral species recorded in each habitat parcel. Nomenclature for higher plants within this report is consistent with the fourth edition of The New Flora of the British Isles (Stace, 2019).

Limitations

- 3.15 There were no specific limitations to the desk study or field survey, which was conducted at an optimum time of year and in good conditions.

Evaluation and Assessment

- 3.16 The evaluation and assessment of ecological features is beyond the scope of a PEA and has therefore not been undertaken here. Formal evaluation and assessment of any identified important ecological features should be undertaken as part of either a full EclA, or receptor-specific survey and assessment in accordance with the published CIEEM method (CIEEM, 2024).

4.0 BASELINE ECOLOGICAL CONDITIONS

Nature Conservation Designations

Statutory

- 4.1 There are no statutory designations covering any part of the Site.
- 4.2 No international statutory designated sites were identified within 10km of the Site.
- 4.3 One national statutory designation was identified within 3km of the Site, Warnham Site of Special Scientific Interest (SSSI) c. 1.4km north-west of the Site.
- 4.4 One local statutory designation were identified within 3km of the Site, Warnham LNR c. 1.4km south-west of the Site.
- 4.5 These statutory designations are described in Table 1 below. Based on the extent of the development and the distance to the designation, it is unlikely to cause significant effects of this designation, which is therefore not taken to represent a constraint to development.

Non-Statutory

- 4.6 Two non-statutory designation(s) were identified within 2km of the Site. These were the Warnham LWS (c. 1.4km south-west of the Site) and Brockhurst Wood & Gill & Morris's Wood LWS (c. 600m north-west of the Site). These non-statutory designations are described in Table 1 below.

Table 1. Statutory and Non-Statutory Designations within search radii

Site Name & Designation	Distance & Direction from Survey Area	Special Interests or Qualifying Features
National Designations within 3km		
Warnham SSSI	c. 1.4km north-west	The Langhurst Wood brick pit exposes the lower Weald Clay Group above the Horsham Stone and is one of the most important sites in this unit. Multidisciplinary evidence of the range of depositional environments may be seen here; freshwater (plants, Cypridea, small Viviparus, Unio, fish etc.), brackish (non-Cypridea ostracods, Filosina etc.), brackish marine (foraminifera, Cassiope etc.) are all present. The preservation of shell aragonite provides carbon isotope evidence to support environmental studies.
Local Designations within 3km		
Warnham LNR	c. 1.4km south-west	The 17 acre Warnham Millpond with its reedbeds, islands and marginal vegetation dominates the reserve. Millpond Plantation and Walnut Tree

		Plantation are a mix of ancient woodland, conifer plantation and mixed broadleaved plantation. Boldings Brook runs through the middle of the reserve in a floodplain and floods the wet grassland and the willow carr in winter.
Non-Statutory Designations within 2km		
Brockhurst Wood & Gill & Morris's Wood LWS	c. 600m north-west	The woodland is dominated by mature hornbeam <i>Carpinus betulus</i> with occasional oak <i>Quercus</i> spp., ash <i>Fraxinus excelsior</i> and birch <i>Betula</i> spp. The habitat supports a locally diverse ground flora including dog's mercury <i>Mercurialis perennis</i> , yellow archangel <i>Lamium galeobdolon</i> and bluebell <i>Hyacinthoides non-scripta</i> . Shallow streams with species-rich margins, together with woodland rides, provide additional habitat diversity and contribute to the ecological value of the woodland.
Warnham LWS	c. 1.4km south-east	Warnham Mill Pond LWS comprises a large open waterbody fed by the Boldings Brook and Channels Brook, with extensive areas of wet woodland dominated by alder <i>Alnus glutinosa</i> and willow <i>Salix</i> spp., tall swamp vegetation, lowland mixed deciduous woodland and species-rich grassland. The site supports a diverse assemblage of flora and fauna, including numerous notable and Section 41 species, and includes a heronry. The ecological value of the site is primarily attributable to its large size and the diversity of high-quality wetland, woodland and grassland habitats present.

Habitats and Flora

- 4.7 Habitats recorded on-site are illustrated in Appendix A with detailed species lists provided in Appendix E. Relevant UKHab codes are provided within parentheses for each habitat type recorded [e.g. Other Neutral Grassland (g3c)].

Irreplaceable Habitats

- 4.8 There is no ancient woodland, as shown on the Ancient Woodland Inventory, covering any part of the Site or immediately adjacent land.
- 4.9 No trees on or adjacent to Site are listed on the Ancient Tree Inventory.

Notable Flora Records

- 4.10 The SxBRC provided 343 records of 58 notable plant species from within the search area, many occurring within Warnham Local Nature Reserve

and deciduous woodland which does not occur on the Site. None of the recorded species are of relevance to the Site.

Modified Grassland (g4) frequently mown (66)

- 4.11 The grassland within much of the Site was dominated by perennial ryegrass *Lolium perenne*, Yorkshire-fog *Holcus lanatus*, creeping bent *Agrostis stolonifera* and meadow-grass *Poa* spp., with associated forb species including daisy *Bellis perennis*, self-heal *Prunella vulgaris*, white clover *Trifolium repens*, greater plantain *Plantago major* and dandelion *Taraxacum* spp., together with occasional bird's-foot trefoil *Lotus corniculatus*. This habitat comprised a garden lawn maintained through regular mowing to approximately 50 mm in height (Habitat Reference F1, Appendix A).

Other Standing Water (r1g) and scattered rushes (14).

- 4.12 There was no standing water ponds on site. The moat pond, circles the Site, and is outside the redline boundary. It was approximately 10m wide with varying water depth, between 10–20cm along the western side, becoming shallower towards the south-eastern extent where areas of exposed substrate were present at the time of the survey. A timber bridge crossed the moat between the northern west banks. Bulrush *Typha* spp. stands were present across the moat occupying less than 50% of the waterbody surface area.

Scattered Scrub (g~10), tall herb (16)

- 4.13 Scattered scrub was present along the bank top margins comprising goat willow *Salix caprea*, grey willow *Salix cinerea*, elder *Sambucus nigra*, dogwood *Cornus sanguinea*, hawthorn *Crataegus monogyna*, *Prunus* species *Prunus* sp.
- 4.14 The moat margins supported tall ruderal vegetation, with sward heights ranging from approximately 0.5m to 1m which extended within the Site red line. This marginal habitat extended approximately 0.5m from the bank top. Species recorded comprised abundant creeping thistle *Cirsium arvense*, frequent hemlock water-dropwort *Oenanthe crocata*, bramble *Rubus fruticosus* agg., pendulous sedge *Carex pendula*, occasional curled dock *Rumex crispus*, nettle *Urtica dioica* and rare occurrences of marsh thistle *Cirsium palustre*, *Angelica* *Angelica sylvestris*.

Line of trees (w1g6) associated with bank and associated water body and Scattered trees (11)

- 4.15 A line of trees is present along the eastern boundary of the moat outside of the Site red line and comprises mature oak and ash. A second line of trees occurs off-site along the south-western boundary and is comprised of mature crack willow *Salix fragilis*, oak and ash.

- 4.16 Scattered trees were present on Site, within the grassland and around sections of the moat margin. Species comprised oak, field maple, ash, plum *Prunus domestica*, crack willow *Salix fragilis* and weeping willow *Salix babylonica*.

Non Native Hedgerows (h2)

- 4.17 Two non-native hedgerows were present within the Site, providing screening around the car park. The hedgerows were 2m in height and up to 1m in width and dense in structure. Species recorded include cherry laurel *Prunus laurocerasus*, elder *Sambucus nigra*, Pyracantha species, silverberry *Elaeagnus* species, Burkwood Brother's Chinese holly *Osmanthus × burkwoodii*, bramble *Rubus fruticosus* agg. and privet *Ligustrum* spp. The hedgerows provide visual screening and habitat opportunities for nesting birds and other wildlife.

Buildings (u1b5)

- 4.18 Three buildings were located within the Site boundary; the farmhouse (MH1) and garage (MH2), and an outhouse (MH3) see Bat Survey Report for full details (CSA/8141/02).

Developed Land Sealed Surface (u1b)

- 4.19 The tarmac driveway and the stone footpath to the front of the farmhouse were mapped as developed land sealed surface.

Unsealed surface, unvegetated (u1c)

- 4.20 A gravel walkway is present to the rear of the property in the back garden.

Scattered Tree

- 4.21 Trees within the survey area comprise English oak, field maple, ash, blackthorn, goat willow *Salix caprea*, turkey oak *Quercus cerris*, cherry plum *Prunus cerasifera*, crack willow *Salix fragilis* and weeping willow *Salix babylonica*.

Fauna

Bats

- 4.22 A total of 212 bat records were identified within the search area, dating from 1994 to 2025. These include the following species: common pipistrelle *Pipistrellus pipistrellus*, noctule *Nyctalus noctula*, Daubenton's bat *Myotis daubentonii*, serotine *Eptesicus serotinus*, brown long-eared bat *Plecotus auritus*. The closest records are of pipistrelle species c. 0.7km east from the Site, recorded using a bat detector in 2014. The closest recorded bat roost was situated approximately 940m south of the Site and was recorded as Chiroptera.
- 4.23 Bat surveys have been undertaken at Moat House Farm on several occasions between 2014 and 2018.

- 4.24 In 2014, Bioscan completed dusk emergence and dawn re-entry surveys of the farm buildings. These surveys confirmed the presence of a small roost of common pipistrelle, with two to four individuals recorded roosting beneath external hanging tiles of the main farmhouse (MH1) and a further two to three individuals recorded beneath hanging tiles on the adjacent garage (MH2).
- 4.25 A subsequent bat building inspection was undertaken in 2015 also by Bioscan. This involved detailed internal and external inspections of all buildings within the Moat House Farm complex for evidence of bat occupation and the presence of features suitable for roosting bats. During the inspection, a long-eared bat *Plecotus* sp. was recorded within the roof void of the farmhouse (MH1).
- 4.26 The buildings were re-inspected in 2018 by Derek Finnie Associates, with surveys undertaken on 18 June 2018 and, for the former children's nursery building, on 20 July 2018. The surveys comprised detailed internal inspections for bat evidence, including droppings, feeding remains and staining, together with an assessment of external roosting features and their suitability for bats.
- 4.27 Collectively, the survey results confirm the historic presence of bats within the Moat House Farm buildings, including confirmed common pipistrelle and long-eared bat roosting records.

Preliminary Roost Assessment - Structures

- 4.28 All on-site structures were assessed for their potential to support roosting bats; see Bat Survey report (CSA/8141/02) for full survey results and survey implications.

4.29

4.30

Dormouse

- 4.31 A total of four records of dormouse *Muscardinus avellanarius* were identified within the search area, dating from 2014 to 2024. The closest record is c. 0.4km east of the Site.
- 4.32 The habitats on Site, do not offer suitability for dormouse, immediately off Site, the lines of trees and scrub surrounding the moat, have the potential to support hazel dormouse. However, due to the site being surrounded by a live construction site it has no arboreal connection to

the wider landscape, which substantially reduces the likelihood of dormice being present. Therefore, the presence of dormouse on Site is considered unlikely.

Water Vole and Otter

- 4.33 A total of five historic records of water vole *Arvicola amphibius* were identified within the search area, dating from 2001 to 2009. The closest record is c. 1.8km south-west of the Site. No records of otter *Lutra lutra* were identified within the search area.
- 4.34 There are no waterbodies on Site, with potential to support otter and water vole, however the surrounding moat has habitat suitability to support these species. The moat is hydrologically disconnected from both the nearest water vole and otter records and the nearest watercourse. The Site is considered unlikely to support water vole and otter due to the high levels of disturbance associated with the surrounding construction activities.

Other Mammals

Records of hedgehog *Erinaceus europaeus* and harvest mouse *Micromys minutus* have been identified within 2km. No records have been found for brown hare *Lepus europaeus* within the 2km radius. However, the Site is no longer considered suitable to support these species. The Site is largely isolated and has limited ecological connectivity to the wider landscape due to the presence of active construction areas. Although the neighbouring habitats provide more suitable habitat and connectivity for these species, it is considered unlikely that they would utilise the Site.

Birds

- 4.35 A total of 7,004 records of 94 bird species were returned within the search area, dating from 2000 to 2025. Species of potential relevance to the Site include barn owl *Tyto alba*, mallard *Anas platyrhynchos*, kingfisher *Alcedo atthis*, red kite *Milvus milvus*, lesser spotted woodpecker *Dryobates minor* and kestrel *Falco tinnunculus*. These records were located within 600m of the Site boundary and include Schedule 1 and Red List species.
- 4.36 Nesting birds were recorded within the farmhouse building MH1, while mallard *Anas platyrhynchos* and moorhen *Gallinula chloropus* were observed using the moat and adjacent areas of short grassland for foraging. The wider landscape outside of the construction zone is diverse, comprising ancient and deciduous woodland, agricultural land, and connected hedgerow networks, which provide a range of suitable habitats for bird species. The site also supports several large, mature scrub and ornamental hedgerows trees, that offer nesting opportunities.

- 4.37 Given the availability of suitable nesting and foraging habitats, breeding birds are present on the site. However, due to the relatively size of the site and its limited connectivity to the wider landscape, the bird community is likely to comprise common nesting species rather than supporting a significant or diverse breeding bird assemblage.

Reptiles

- 4.38 A total of 910 records of four reptile species were identified within the search area, comprising slow worm *Anguis fragilis*, common lizard *Zootoca vivipara*, grass snake *Natrix helvetica* and adder *Vipera berus*. The majority of records are located south of the A264, which is considered a significant barrier to reptile movement in relation to the Site, and are largely associated with Warnham SSSI.
- 4.39 Habitat suitable for reptiles on Site is largely restricted to the moat margins and banks, where the grass sward is longer and scattered scrub provides potential refuge. Construction materials located to the west of building MH2 may also offer sheltering opportunities for reptiles. Habitat connectivity is limited, as the Site is located within the centre of an active construction site and is largely isolated from surrounding suitable habitat. Consequently, the presence of reptiles on Site is considered unlikely.

Amphibians

- 4.40 A total of 661 records of five amphibian species were identified within the search area, comprising great crested newt *Triturus cristatus*, palmate newt *Lissotriton helveticus*, smooth newt *Lissotriton vulgaris*, common toad *Bufo bufo* and common frog *Rana temporaria*. The nearest amphibian record was of great crested newt *Triturus cristatus* recorded on the Site in 2018. In addition, 12 records of great crested newt were returned from three separate ponds located within 300m of the Site boundary, with records dating from 2018 to 2024.
- 4.41 A network of ponds occurs within the local landscape, with one pond recorded on-site and two recently created water bodies to the north west of the moat. The moat margins are well developed, and scattered scrub and debris present on the site could provide suitable refugia for amphibians. Given the availability of aquatic and terrestrial habitats, it is considered likely that amphibians utilise the site.
- 4.42 Marsh frogs *Pelophylax ridibundus* were heard within the adjacent ponds to the north west of the site during the walkover survey on 2nd July 2026. Marsh frogs are not native of the UK but are well established in the south – east of England, having being historically released in the 1930s in Kent. They are known to predate on our native amphibian species.
- 4.43 A single common frog was identified on Site on 27th July 2026, under a paving slab.

- 4.44 A more detailed appraisal of the Site in respect of great crested newt is provided below.

Great Crested Newt

- 4.45 Despite spending much of their annual lifecycle within the terrestrial environment, great crested newts are dependent upon the presence of suitable aquatic breeding habitat in order for a population to persist. The most provides a potential breeding pond on-site, while a further 13 appear to be present within a dispersible range of the Site, based on OS mapping and two additional newly created waterbodies to the north west of the Site.
- 4.46 Great crested newt (GCN) surveys have been undertaken at the ponds since 2014, during which three individual GCN were recorded within ponds P4 and P5 (the adjacent moat). In 2018, eDNA samples were collected from ponds P2, P5 (the moat), P18 and P27, all of which returned positive results for GCN (Bioscan Report No. e15851/scope/P1/V2). Additional water samples testing for great crested newt DNA were undertaken on the moat pond P5 in 2019, 2022, and 2025 and these all came back negative for great crested newt DNA.
- 4.47 Since that time, substantial development has taken place across the surrounding area. Consequently, CSA undertook further GCN eDNA sampling within the local and wider landscape in 2026. The moat P5 returned a negative result for GCN. However, a number of ponds in the surrounding area, including P4, P23, P37, P48 and P52, returned positive results, confirming the continued presence of GCN within the wider landscape.
- 4.48 Although GCN were historically recorded within P4 and P5, the most recent survey evidence indicates that P5 is no longer occupied. Nevertheless, positive eDNA results from several nearby ponds demonstrate that the species remains present in the wider landscape and therefore retains the potential to disperse through suitable connected habitats where opportunities exist.
- 4.49 A single great crested newt was identified on Site on 27th July 2026, under a paving slab.

Invertebrates

- 4.50 A total of 6,686 records of 258 invertebrate species were identified within the search area. Species of potential relevance to the Site include brown hairstreak *Thecla betulae*, common darter *Sympetrum striolatum* and jersey tiger *Euplagia quadripunctaria*. The Site is not located within an Important Invertebrate Area (IIA), and the majority of notable invertebrate records are associated with habitats of higher ecological value within the wider landscape.

5.0 DISCUSSION AND RECOMMENDATIONS

Nature Conservation Designations

Statutory

National Statutory

- 5.1 There is one Site of Special Scientific Interest (Warnham SSSI) and one Local Nature Reserve (Warnham LNR) located within 3 km of the site. The proposed development would result in an increase in local housing provision and likely footfall to these habitats. However, given the limited size of the Site and the that it contributes to a larger residential development, it is considered unlikely that the proposed development would result in any significant adverse effects on Warnham SSSI or Warnham LNR beyond those already addressed through existing mitigation and compensation measures associated with the wider development.

Non Statutory

- 5.2 There are two Local Wildlife Sites Located within 2km of the Site including the Brockhurst Wood & Gill & Morris's Wood (LWS) and Warnham Mill Pond (LWS). Housing provision within the Site may increase footfall to these sites, which should be addressed through existing mitigation and compensation measures associated with the wider development.

Habitats and Flora

Modified grassland

- 5.3 Approximately half of the site comprises regularly mown modified grassland (habitat ref F1 in Appendix A), with longer grassland margins present around the moat. The proposed development would retain areas of modified grassland within the site, although the overall extent would be reduced.
- 5.4 It is recommended that areas of grassland margin are managed as longer grassland and retained where practicable, to maintain structural diversity and provide habitat opportunities for invertebrates and other wildlife.

Standing Open Water

- 5.5 The adjacent moat offers suitable habitat of amphibian and water fowl species, which may use both the moat and the terrestrial habitats on Site. The habitat also supports a range of ecological features of value to wildlife, including stands of bulrush and areas of scattered scrub that provide suitable nesting habitat for birds and invertebrate life.

- 5.6 Should any maintenance works to the adjacent moat such as de-siltation be required in future then the need for a great crested newt licence will need to be assessed prior to works commencing.
- 5.7 The existing bankside habitats and trees of the moat, within the Site, should be protected and maintained.

Line of trees and Scattered Trees

- 5.8 The majority of the trees on site including the trees associated with the moat banks and the ash in the centre of the driveway are all to be retained. These trees offer foraging resources, breeding, and refuge of a variety of fauna.
- 5.9 Where works to the trees are required, the trees should first be subject to a ground level tree assessment for bats to inform appropriate mitigation.
- 5.10 An arboricultural method statement is recommended to ensure the retained trees are protected during the construction. During the construction phase, suitable protective fencing should be erected around all retained trees, in line with requirements of BS 5837:2005 Trees in Relation to Design, Demolition and Construction.

Non Native Hedgerows

- 5.11 The hedgerows screening around the car park and offer suitability for breeding birds. These will be lost under current design proposals. Nesting bird provision will be retained on site in the perimeter habitats.

Fauna

Bats

- 5.12 Buildings MH1, MH2 and MH3 had suitability to support bat roosts, and buildings MH1 and MH2 had confirmed bat roosts and were assessed to have 'high' suitability, with MH3 having 'low' suitability under Bat Conservation Trust 2023 guideline (BCT,2023). As such, three dusk/dawn bat surveys would be recommended on Buildings MH1 and MH2, with one dusk/dawn emergence survey on MH3 to confirm presence/likely absence and inform a European Protected Species (EPS) bat mitigation licence from Natural England, before works proceed.
- 5.13 Additionally, some of the trees on and around the Site offer potential bat roosting features such as cracks and crevices, tear outs wounds and rot holes. Any trees considered likely to have bat roost potential that are proposed to be removed to facilitate development or which would be subject to impacts from tree surgery work/new lighting spill, may need to be subject to three tree climbing/ emergence surveys. To assess the tree for presence/likely absence of roosting bats to inform mitigation to be put forward to support any detailed planning application, if required. A ground level tree assessment (GLTA) would be required of the trees to be affected in the first instance.

- 5.14 A sensitive lighting scheme has been designed, using low level bollard lighting to light only car parking areas and roads. This is to maintain dark corridors around the Site boundary for bats and other nocturnal wildlife.
- 5.15 Bats and their roost sites are afforded strong protection under the provisions of the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017, and as such should any impacts to roost sites be anticipated then implementation of any consented scheme would need to be subject to a European Protected Species (EPS) mitigation licence from Natural England.

Nesting birds

- 5.16 The habitats present on Site are suitable for nesting birds, with nesting birds found within building MH1.
- 5.17 All wild birds are protected from killing and injury, and their nests and eggs are protected from damage and destruction, under the Wildlife and Countryside Act 1981 (as amended).
- 5.18 Therefore, any clearance of nesting habitat or features required to facilitate the development should avoid the period between March and August (inclusive) when nesting birds are most likely to be present. If this is not possible, habitat will need to be checked for nesting birds by a suitably qualified ecologist prior to clearance, with works only proceeding if no nesting evidence or behaviour are observed.

Reptiles

- 5.19 Opportunities for reptiles were confirmed at the Site comprising tall herb grassland and dense scrub and left building materials.
- 5.20 All British reptile species are listed within Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and are afforded protection against killing and injury under parts of sub-section 9(1) of the Act. In addition, all British reptile species are species of principal importance under S41 of the NERC Act (2006) in England.
- 5.21 As reptiles may still utilise retained habitat features, a precautionary reptile check should be undertaken immediately prior to vegetation clearance and the commencement of construction works.

Great Crested Newt

- 5.22 Terrestrial habitats within the Site, notably the grassland margins and scattered scrub, offer suitable support to dispersal, refuge and foraging for great crested newts, and records indicate the presence of this species in the local landscape.
- 5.23 One great crested newt was found on Site in July 2026. Ponds P5, P54 and P55 adjacent to the Site recorded as negative for great crested

newt eDNA in 2026 but several ponds in the local landscape recording positive eDNA results (see Appendix C).

- 5.24 Due to the confirmed presence of GCN on Site in 2026. Construction works on Site are likely to require and great crested newt licence or district level licence to allow the development to proceed.

Summary of Recommendations

- 5.25 Based on the ecological constraints identified above, Table 2 summarises recommendations for further work necessary to determine the need for, and scope of, any avoidance, mitigation and/or compensation measures to address potential adverse effects of development.

Table 2. Recommendations for further investigation/survey

Ecological Feature	Further Work	Applicable Timescales
Bats	Preliminary ground-based roost assessment of on-site trees	Preliminary ground-based roost assessment
	Dusk/pre-dawn emergence/return surveys of Buildings MH1, MH2, and MH3 to inform licence requirements	May – August 2026 - ongoing
Great Crested Newts	Provision of suitable licensing protocol likely required prior to commencement of construction activities on Site.	Prior to commencement of construction activities.
Reptiles	Precautionary working method statement to include hand search of suitable habitats during clearance works between April-September inclusive. Avoid disturbance of suitable hibernation habitats during Nov – Feb inclusive. To be included as part of a CEMP.	April-September inclusive
Nesting Bird Check	Nesting bird check of suitable habitat required if clearance works proceed during the nesting bird season (March-August, inclusive). To be included as part of a CEMP.	March – August (inclusive)

Opportunities for Ecological Enhancement

- 5.26 To promote adherence to the NPPF and Horsham District Council the following opportunities for ecological enhancement have been identified:
- Retention and maintenance of the habitats associated with the moat banks within the Site and enhancement through additional native shrub planting on the bank top.

- Incorporation of native plants and those of wildlife importance in to landscaping scheme to provide foraging opportunities for birds, invertebrates and bats.
- Provision of four new bat roosting opportunities within new buildings (e.g. Schwegler 1FF or similar), ideally at a minimum of 5m high with a clear entry (i.e. uncluttered by vegetation) and a southerly/westerly aspect. The provision of one bat box (Schwegler 2F) on a tree to provide interim roosting resource during construction.
- Provision of three bird boxes for cavity-nesting species (e.g. Habibat starling box, swift box and sparrow terrace 1BB or similar) on new buildings and retained trees. Boxes should be located at a minimum height of 5m off the ground with a northerly aspect.
- Improved connectivity of green infrastructure with new hedgerow planting and infill planting.
- Provision of hedgehog gaps in new fencing to promote habitat connectivity across and within the Site.
- Provision of two hibernacula on Site, associated with the moat bankside vegetation, to provide habitat for reptile and amphibian species.

6.0 CONCLUSIONS

- 6.1 The update Site assessment confirmed the habitats present on site to be consistent with those previously identified during historical ecological assessments.
- 6.2 The habitats with highest ecological importance are the scattered trees, tall ruderal vegetation and scrub on the moat pond margins.
- 6.3 The site has the confirmed presence of these protected species:
- Bats
 - Great Crested Newts
- 6.4 The site has the potential to support the following protected species:
- Reptiles
 - [REDACTED]
- 6.5 Additional survey work for bats is ongoing, comprising update building surveys and emergence surveys and a ground level tree assessment. A European protected species mitigation (EPSM) licence for bats will be required to allow the demolition of building MH2 and the conversion and extension of MH1.
- 6.6 A EPSM licence for great crested newts is likely to be required to allow the development works to proceed.
- 6.7 [REDACTED]
- 6.8 Recommendations for ecological enhancement measures that could be delivered as part of development at the Site have been provided here-in.

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Appendix A

Habitats Plan & Habitat Summary Table



- Site boundary
- Survey Area
- Modified grassland (g4)
- Tall Herbs (16)
- Scattered Scrub (10)
- Developed land. sealed surface (u1b)
- Buildings (u1b5)
- Artificial unvegetated unsealed surface (u1c)
- Other standing water (r1g)
- Other Hedgerows (h2b)
- Line of trees associated with bank and waterbody (w1g6)
- Scattered trees
- Field reference
- Hedgerow reference
- Gate
- Target note
TN1 - Building materials
TN2 - Scattered bullrush



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Project	Mowbray Phase 1, North Horsham	Date	July 2026	Drawing No.	CSA/8141/106
Drawing Title	Habitats Plan	Scale	Refer to scale	Rev	-
Client	Legal and General (Strategic Land Horsham) Ltd	Drawn	WC	Checked	TS

Table 1. UK Habitat Classification Summary Table

Habitat Parcel Number	Habitat Type	Primary Code	Secondary Code(s)	Description
F1	Modified grassland	g4	66, 10, 16, 11	Mown modified grassland formerly managed as garden habitat. Dominated by common species including daisy, self-heal, white clover, Yorkshire fog and dandelion. Taller marginal grassland occurs around the pond margins supporting hemlock water-dropwort, wood avens, cleavers, upright brome, pendulous sedge, cocksfoot and occasional nettle. Scattered scrub and trees occur throughout.
P5	Other standing water	r1g	14	Pond surrounding much of the Site perimeter with variable water depths. Extensive stands of bulrush occur locally but cover less than 50% of the waterbody. Pond margins support a range of wetland vegetation and provide habitat for amphibians and birds.
MH1, MH2, MH3	Buildings	u1b5	-	Three buildings comprising a farmhouse (MH1), garage (MH2) and outhouse (MH3). Buildings have been identified as having suitability for roosting bats.
	Developed land; sealed surface	u1b	-	Hardstanding associated with vehicle access and parking areas serving the property.
	Unsealed surface, unvegetated	u1c	-	Small areas of courtyard and gravel surfacing to the front and rear of the property.
H1, H2	Line of trees	w1g6	Bank/ditch associated	Line of mature trees along the eastern boundary comprising oak and ash. A second off-site line of mature crack willow, oak and ash occurs along the south-west boundary.
H3, H4	Non-native hedgerow	h2	-	Dense hedgerows approximately 2 m high providing screening around the car park. Species include cherry laurel, elder, cotoneaster, bramble and privet.
	Scattered trees	w1g	11	Scattered mature and semi-mature trees distributed across the grassland and pond margins. Species include goat willow, ash, crack willow, plum and oak.

Appendix B

Legislation and Planning Policy

- 1.1. The **Conservation of Habitats and Species Regulations 2017** (as amended) make prescriptions for the designation and protection of Sites of Community Importance ('European sites', i.e. Special Areas of Conservation and Special Protection Areas) and European Protected Species (EPS). The latter include all native bats, great crested newts, dormice, otters and certain reptiles, listed under Annex II of the Regulations. Following the UK's departure from the European Union, the provisions of the Regulations have been retained through enactment of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, which came into force on 31 December 2020.
- 1.2. The **Wildlife and Countryside Act 1981** (as amended, principally by the Countryside and Rights of Way Act 2000) forms the basis for protection of statutory designated sites of national importance (e.g. Sites of Special Scientific Interest; SSSIs) and native species that are rare and vulnerable in a national context. Additionally, badgers are protected under the **Protection of Badgers Act 1992**.
- 1.3. The **Environment Act 2021** received Royal Assent in November 2021. Through an amendment to the Town and Country Planning Act 1990 the Environment Act introduced a mandatory requirement for all planning permissions to be conditional upon the submission of a Biodiversity Gain Plan for approval by the Local Planning Authority. The Plan will need to demonstrate a net gain of at least 10% in the biodiversity value of the development site.
- 1.4. Section 40(1) of the **Natural Environment and Rural Communities (NERC) Act 2006** (as amended) states that each public authority, "must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving and enhancing biodiversity." This legislation makes it clear that planning authorities should consider impacts to biodiversity when determining planning applications, with particular regard to the Section 41 (S41) lists of 56 habitats and 943 species of principal importance. The UK Biodiversity Action Plan (BAP) has been superseded by the Biodiversity 2020 Strategy, however Local BAPs continue to influence biodiversity management and conservation effort, including through the spatial planning system, at the local scale.
- 1.5. The **National Planning Policy Framework (2024)** (NPPF) sets out government planning policies for England and how they should be applied. With regards to ecology and biodiversity, Chapter 15: Conserving and Enhancing the Natural Environment, paragraph 187, states that the planning system and planning policies should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

- 1.6. Paragraph 193 sets out the principles that local planning authorities should apply when determining planning applications:
- If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
 - Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.
 - Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.
 - Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.
- 1.7. Accompanying the NPPF, central government guidance on the implementation of planning policies is set out within online Planning Policy Guidance (PPG). The Natural Environment PPG addresses principles across a broad spectrum of topics targeting biodiversity conservation, from individual site and species protection through to the supporting of ecosystem services, and the use of local ecological networks to support the national Nature Recovery Network. In particular, the PPG promotes the delivery of measurable Biodiversity Net Gain through the creation and enhancement of habitats alongside development.
- 1.8. The **Government Circular 06/2005**, which is referred to within the NPPF, defines statutory nature conservation sites and protected species as a material consideration in the planning process.
- 1.9. Local planning policies of relevance to ecology, biodiversity and/or nature conservation have been set out in Table 1 below.

Table 1. Summary of regional and local planning policy relating to ecology

Policy	Summary
Horsham District Council Local Plan 2023 -2050	
Strategic Policy 17: Green	<u>Green Infrastructure</u>

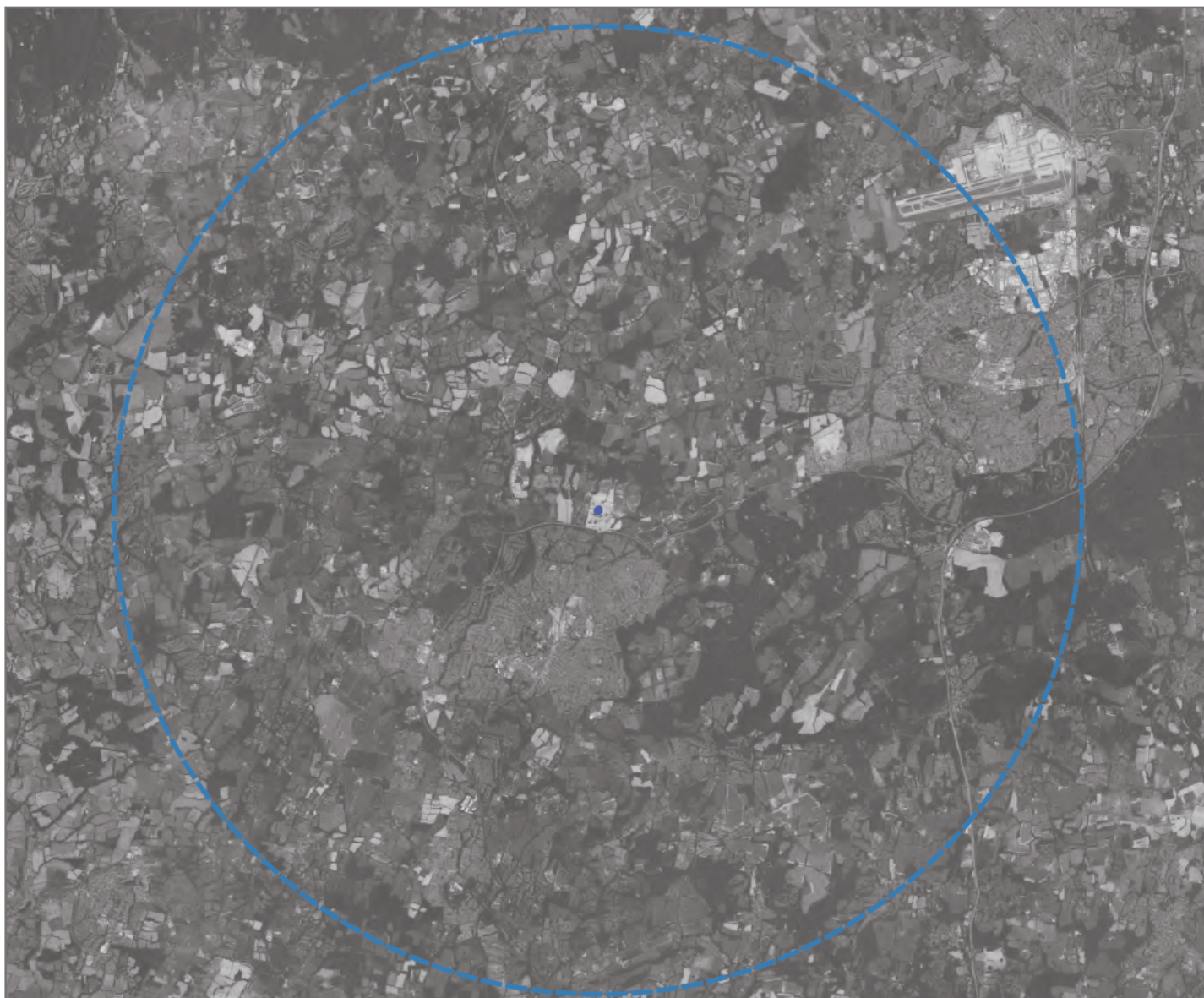
Policy	Summary
Infrastructure and Biodiversity	1. Development will be supported where it can demonstrate that it maintains and enhances the existing network of green infrastructure and contributes to the delivery of public open space, the Local Nature Recovery Strategy, Nature Recovery Network, natural 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. 4. 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. <u>Biodiversity</u> 5. The Council will support appropriate new development which delivers at least 12% biodiversity net gain and: a) Retains and enhances significant features of nature conservation value on development sites; b) 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 c) 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.

Policy	Summary
	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: a) Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites; b) Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), Veteran Trees, Ancient Woodland and other irreplaceable habitats; 75 c) 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 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.

Policy	Summary
	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.

Appendix C

Desk Study Information



-  Site boundary
-  Survey Area
-  10km buffer



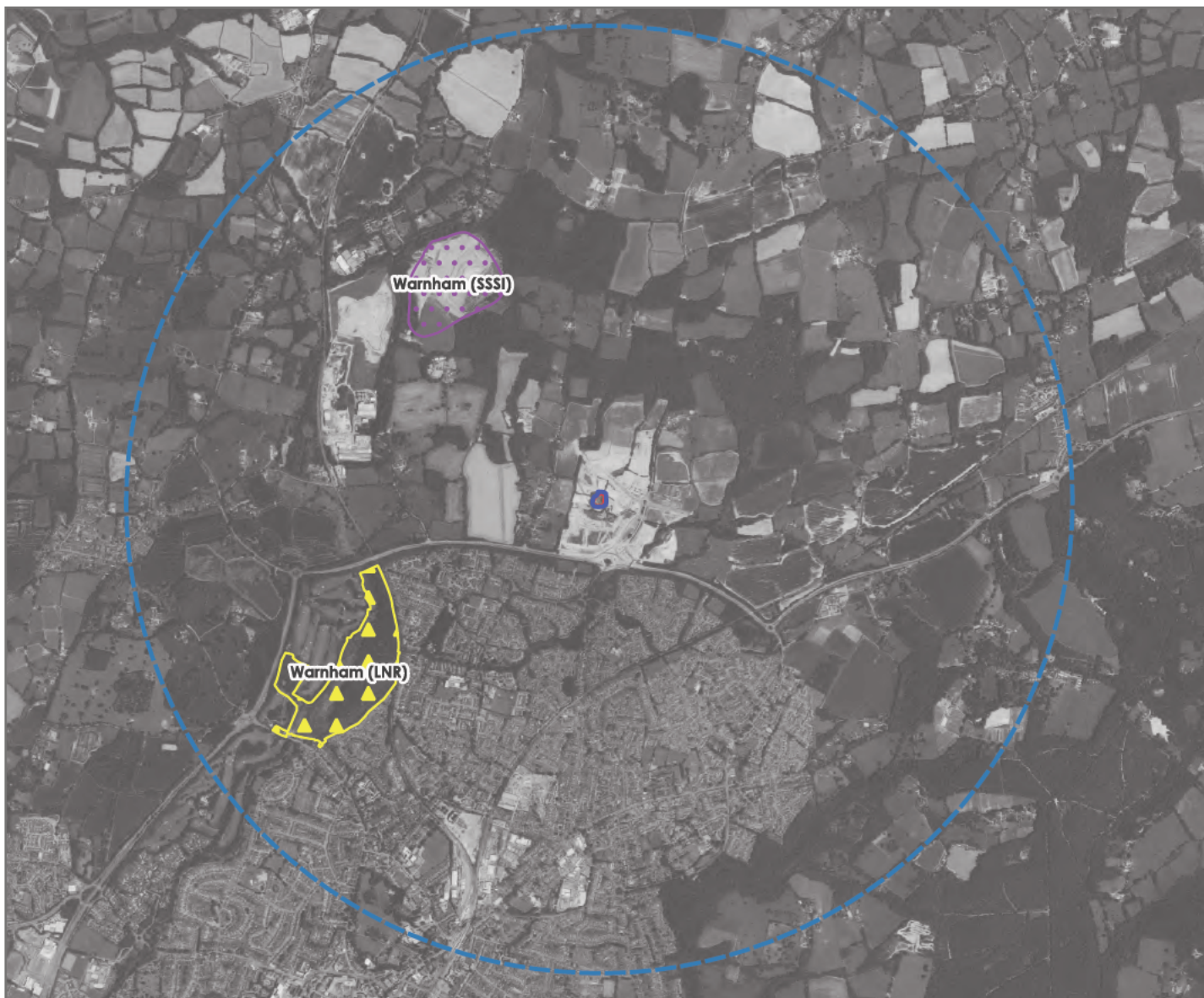
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Office 20, Citibase, 95 Ditchling Road,
Brighton BN1 4ST

† 01273 573871
e brighton@csaenvironmental.co.uk
w csaenvironmental.co.uk

Project	Mowbray Phase 1, North Horsham	Date	July 2026	Drawing No.	CSA/8141/105
Drawing Title	International Statutory Designations	Scale	Refer to scale	Rev	-
Client	Legal and General (Strategic Land Horsham) Ltd	Drawn	AC	Checked	TS



- Site boundary
- Survey Area
- 3km buffer
- Local Nature Reserves (LNR)
- Site of Special Scientific Interest (SSSI)



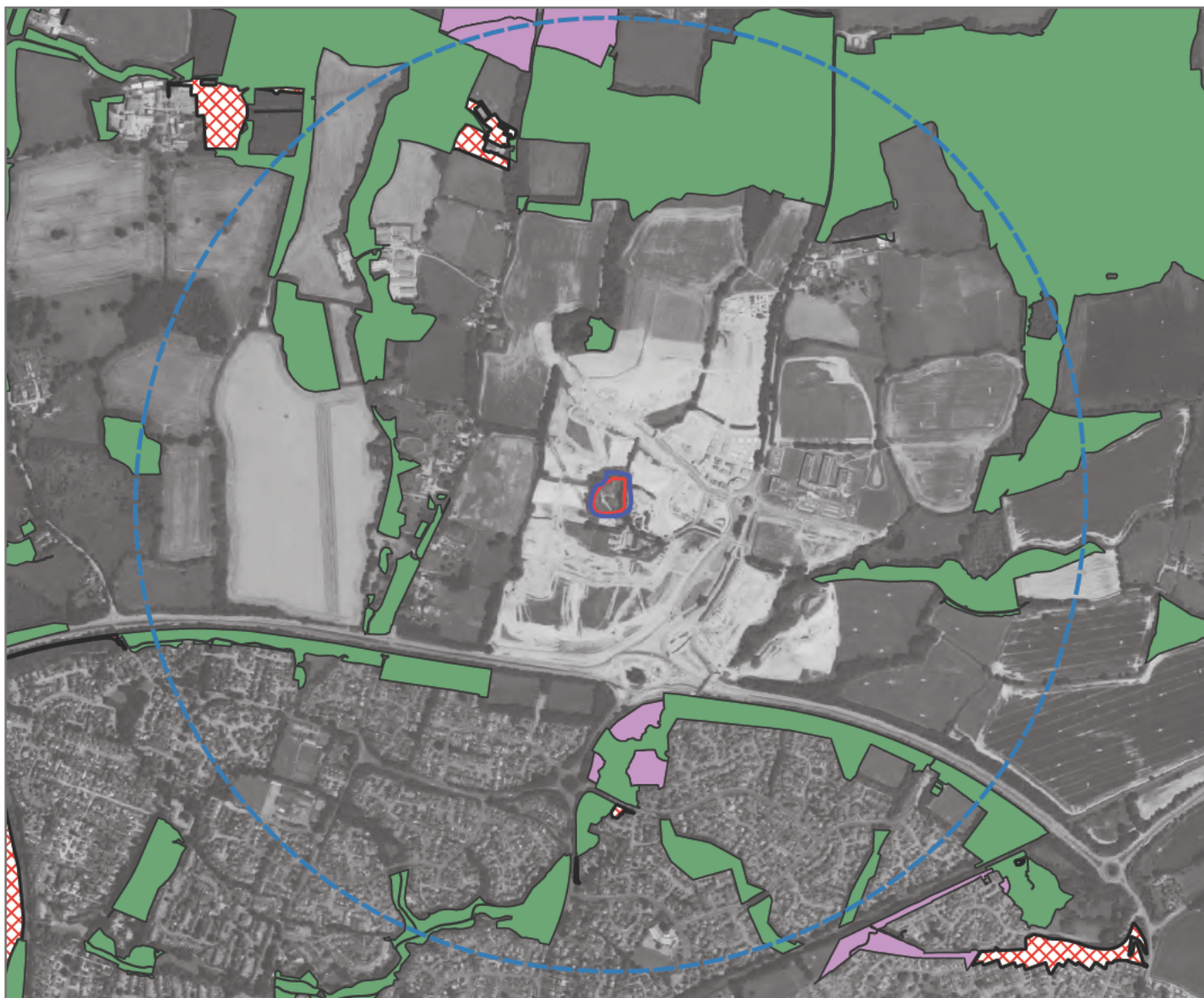
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Office 20, Citibase, 95 Ditchling Road,
Brighton BN1 4ST

† 01273 573871
e brighton@csaenvironmental.co.uk
w csaenvironmental.co.uk

Project	Mowbray Phase 1, North Horsham	Date	July 2026	Drawing No.	CSA/8141/102
Drawing Title	National Statutory Designations	Scale	Refer to scale	Rev	-
Client	Legal and General (Strategic Land Horsham) Ltd	Drawn	AC	Checked	TS



- Site boundary
- Survey Area
- 1km buffer
- Deciduous woodland
- Good quality semi improved grassland
- No main habitat but additional habitats



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Office 20, Citibase, 95 Ditchling Road,
Brighton BN1 4ST

† 01273 573871
e brighton@csaenvironmental.co.uk
w csaenvironmental.co.uk

Project	Mowbray Phase 1, North Horsham	Date	July 2026	Drawing No.	CSA/8141/103
Drawing Title	Priority Habitats	Scale	Refer to scale	Rev	-
Client	Legal and General (Strategic Land Horsham) Ltd	Drawn	AC	Checked	TS



- Site boundary
- Survey Area
- 1km buffer
- Ancient & Semi-Natural Woodland
- Ancient Replanted Woodland



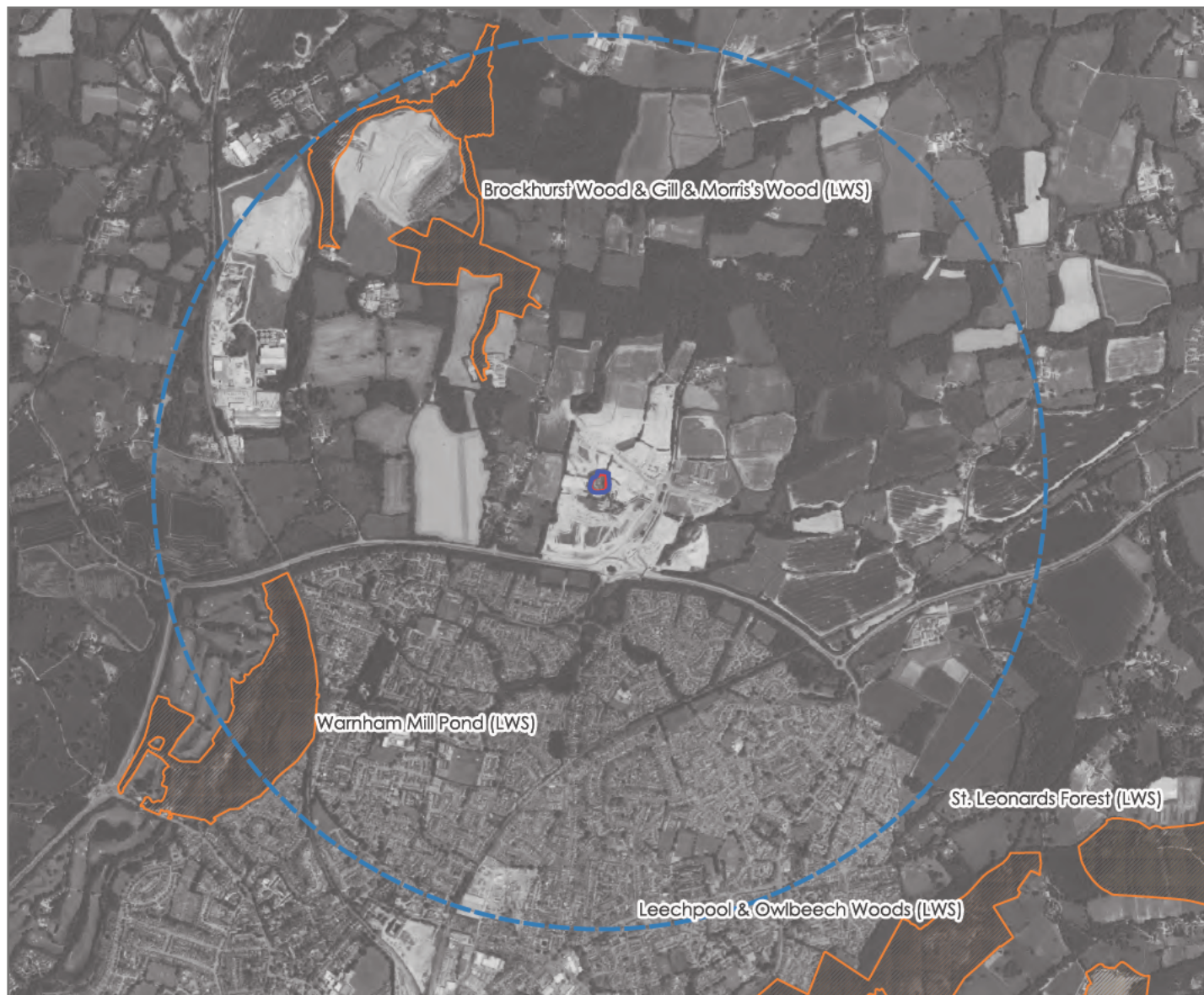
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Office 20, Citibase, 95 Ditchling Road,
Brighton BN1 4ST

† 01273 573871
e brighton@csaenvironmental.co.uk
w csaenvironmental.co.uk

Project	Mowbray Phase 1, North Horsham	Date	July 2026	Drawing No.	CSA/8141/104
Drawing Title	Ancient Woodlands	Scale	Refer to scale	Rev	-
Client	Legal and General (Strategic Land Horsham) Ltd	Drawn	AC	Checked	TS



- Site boundary
- Survey Area
- 2km buffer
- Local Wildlife Sites



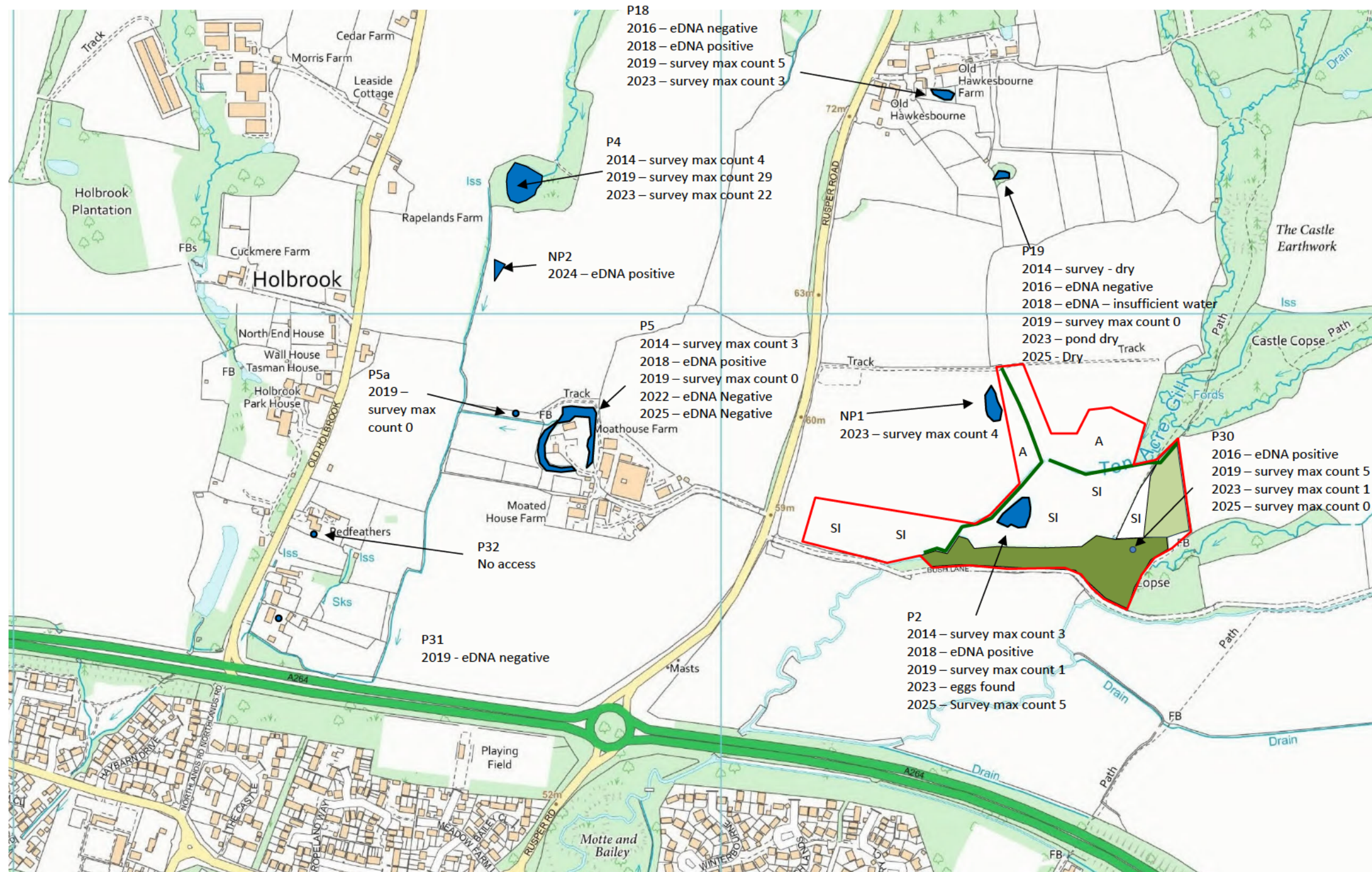
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Office 20, Citibase, 95 Ditchling Road,
Brighton BN1 4ST

† 01273 573871
e brighton@csaenvironmental.co.uk
w csaenvironmental.co.uk

Project	Mowbray Phase 1, North Horsham	Date	July 2026	Drawing No.	CSA/8141/105
Drawing Title	Local Wildlife Sites	Scale	Refer to scale	Rev	-
Client	Legal and General (Strategic Land Horsham) Ltd	Drawn	AC	Checked	TS



Legend:

- Area covered by current licence application.
- Broad-leaved woodland
- Orchard
- Pond
- SI Semi-improved grassland
- A Arable
- Hedgerow

0m

500m



Drawing No: Figure 1

Title: Survey Map

Date: December 2025

Project: Phase II Newt Masterplan

Client: L & G



20 Soames Place
Wokingham
Berks RG40 5AT

info@derekfinnie.com



- Site boundary
- 250m Pond Buffer
- 500m Pond Buffer
- Ponds with eDNA results**
 - Positive x8
 - Not Surveyed x1
 - Dry x3
 - Negative x6
 - Indeterminate x3

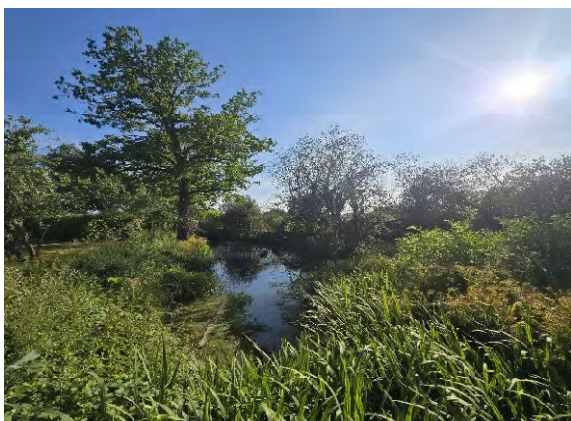


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Project	Mowbray Phase 1, North Horsham	Date	July 2026	Drawing No.	CSA/8141/107
Drawing Title	Pond Plan	Scale	Refer to scale	Rev	-
Client	Legal and General (Strategic Land Horsham) Ltd	Drawn	WC	Checked	TS

Appendix D

Photographs



Photograph 1. P5 taken from the north off Site looking south.



Photograph 2. Building MH1 north elevation taken from north bank of moat with tall ruderal, scrub and bulrush of moat bank tops present in foreground.



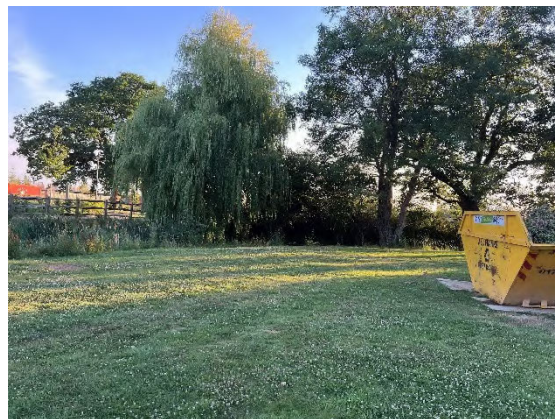
Photograph 3. Building material behind building MH2 (target note 2).



Photograph 4. Moat, (Pond P5) in the north-east. Decreased water level evident.



Photograph 5. Moat (P5) , vegetated banks with tall ruderal, scattered scrub and trees along bank tops.



Photograph 6. Field F1 modified grassland with scattered trees and a line of trees on the other side of the Pond.



Photograph 7. Field F1 modified grassland which is heavily mown.



Photograph 8. Hardstanding driveway used for car parking.

Appendix E

Habitats and Flora Species List

Table 1. Habitat Polygons

Site Name	Mowbray Ph1 North Horsham								
Survey Date and Surveyor(s)	02/07/2026 William Campbell and Theresa Stuart								
Scientific Name	Common Name	Habitat Parcel Number/Habitat Type							
		F1 (Mown Grassland)	F1 (Field Margins)	F1 Scattered scrub)	P5	H1	H2	H3	H4
Herb Species									
Arctium minus	Lesser burdock			x					
Bellis perennis	Daisy	x							
Berberis sp.	Barberry								
Cirsium arvense	Creeping thistle		x						
Cirsium palustre	Marsh thistle			x					
Galium aparine	Cleavers		x	x					
Geum urbanum	Wood avens		x						
Helminthotheca echiioides	Bristly oxtongue	x	x						
Heracleum sphondylium	Hogweed		x	x					
Lotus corniculatus	Common bird's-foot-trefoil	x	x						
Oenanthe sp.	Water-dropwort		x		x				
Plantago major	Greater plantain	x	x						
Prunella vulgaris	Selfheal	x							
Ranunculus repens	Creeping buttercup	x	x						
Rumex acetosella	Sheep's sorrel								
Rumex conglomeratus	Clustered dock								
Rumex crispus	Curled dock		x						
Rumex obtusifolius	Broad-leaved dock	x	x	x					
Taraxacum agg.	Dandelion	x	x						
Trifolium repens	White clover	x							
Urtica dioica	Common nettle		x	x					
Sedges and Rushes									
Carex pendula	Pendulous sedge				x				
Schoenoplectus lacustris	common club-rush				x				
Grasses									
Agrostis capillaris	Common bent	x	x						
Arrhenatherum elatius	False oat-grass		x						
Bromus hordeaceus	Soft-brome		x						
Melica uniflora	wood melic		x						
Dactylis glomerata	Cock's-foot		x						
Holcus lanatus	Yorkshire-fog	x	x						
Lolium perenne	Perennial rye-grass	x	x	x					
Woody Species									
Coniferous									
	spruce sp		x						
Broadleaved									
Cornus sp.	Dogwood			x	x				
Fraxinus excelsior	Ash	x	x		x	x	x		
Prunus cerasifera	Cherry plum		x						
Solanum dulcamare	Iuarel			x				x	x
Quercus sp.	Oak	x				x	x		
Rosa arvensis	Field-rose		x						
Rosa canina sp.	Dog-rose			x					
Rubus fruticosus agg.	Bramble			x				x	
Salix caprea	Goat willow					x	x		
Salix sp.	Willow					x	x		
Sambucus nigra	Elder				x			x	



Dixies Barns, High Street,
Ashwell, Hertfordshire
SG7 5NT

t 01462 743647
e ashwell@csaenvironmental.co.uk
w csaenvironmental.co.uk

Office 20, Citibase,
95 Ditchling Road,
Brighton BN1 4ST

t 01273 927399
e brighton@csaenvironmental.co.uk
w csaenvironmental.co.uk

3 Ripple Court,
Brockridge Park, Twynning,
Tewkesbury GL20 6FG

t 01386 751100
e tewkesbury@csaenvironmental.co.uk
w csaenvironmental.co.uk

Wizu Workspace, 32 Eyre
St, Sheffield City Centre,
Sheffield S1 4QZ

t 07838 290741
e sheffield@csaenvironmental.co.uk
w csaenvironmental.co.uk

Worting House,
Church Lane, Basingstoke,
RG23 8PY

t 01256 632340
e basingstoke@csaenvironmental.co.uk
w csaenvironmental.co.uk

Appendix E

Update interim bat report

Bat Survey Report

July 2026

**Phase 1 – Mowbray, Moat House,
North Horsham**

Prepared by
CSA Environmental

On behalf of Legal and General
(Strategic Land North Horsham) Ltd

Report No: CSA/8141/02

This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

Report Reference	Revision	Date	Prepared by	Approved by	Comments
CSA/8141/02	-	10/07/2026	TS	XX	Draft



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EXECUTIVE SUMMARY

CSA Environmental was instructed by Legal and General (Strategic Land North Horsham) Ltd in June 2026 to undertake update bat surveys on the Moat house, located within Phase 1 of the Mowbray North Horsham development.

Strategic development at Mowbray is subject to an outline planning permission (DC/16/1677) and will provide up to 2,750 dwellings alongside retail and business areas, leisure and education facilities, Public Open Space, and associated landscaping and infrastructure.

The Moat house site comprises three buildings, the farmhouse (MH1), a triple garage/barn with residential flat on first floor, adjacent to the farmhouse (MH2), and a small barn/outbuilding (MH3).

Previous bat surveys undertaken by Bioscan in 2009, 2015 identified the following bat roosts within the buildings on site:

- Brown long-eared and common pipistrelle bats in MH1,
- Common and soprano pipistrelles in MH2

Update surveys are proposed for 2026 to inform the need for a bat licence to convert the farmhouse (MH1) and garage (MH2) into two residential respectively and the demolition of and MH3 to facilitate the construction of residential units on the Site.

This interim report details the findings of an update preliminary roost assessment of the three buildings and the first emergence survey, both undertaken on 2nd July 2026 and bulleted below. Additional emergence survey are planned for 23/07/26 and 14/08 2026.

- MH1 – was found to have over 1000 bat droppings in the roof void consistent with long eared species.
- MH2 – had approximately 10 bat droppings in the roof void and had common pipistrelle bats emerging from the southern elevation hanging tiles.
- MH3 – had no evidence of bats confirmed during the building inspection and the video footage of the one bat emergence survey undertaken in 2026 is yet to be analysed.

As the buildings MH1 and MH2 contain bat roosts, a European Protected Species Licence will be required before the conversion and demolition works can commence. Results of further survey works are still required to inform this assessment.

1.0 INTRODUCTION

- 1.1 This report has been prepared by CSA Environmental on behalf of Legal and General (Strategic Land North Horsham) Ltd. It sets out the findings of update bat survey work undertaken at the Moat house Farm, located within Phase 1 of the Mowbray North Horsham development (hereafter referred to as 'the Site').
- 1.2 The Site is located around central grid reference TQ 18788 33836, to the north of Horsham. The Site comprises three buildings including a residential property Moat House Farmhouse (MH1), a triple garage with residential flat above (MH2) and a small brick outbuilding (MH3) with associated gardens and driveways, surrounded by a treelined moat waterbody feature.
- 1.3 Development proposals at the Site include the provision of 11 residential units including the conversion into MH1 and MH2 into two properties each, the demolition of MH3 and construction of further residential units within the grounds of the Moat House. Roads and parking spaces and will be created.
- 1.4 The following bat survey work was carried out:
 - Inspection of building(s) to assess bat roost potential (2nd July 2026)
 - Bat emergence survey of MH1, MH2 and MH3 (2nd July 2026) with two additional surveys planned in late July and mid August.
- 1.5 The purpose of these surveys was to update historical bat survey data for the property and assess the potential for the three buildings to support roosting bats and, advise on the likelihood of requiring a European protected species licence to allow the proposed works to commence.
- 1.6 The content of this report has been determined with due consideration for best-practice guidance provided by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017; 2024).

2.0 LEGISLATION, PLANNING POLICY & STANDING ADVICE

2.1 All British bat species are legally protected under Regulation 43 of the Conservation of Habitats and Species Regulations 2017 (as amended). These Regulations make it an offence to:

- Deliberately capture, injure, or kill a bat
- Deliberately disturb bats, impairing their ability to survive, breed, reproduce or rear/nurture their young, or which significantly affects the local distribution or abundance of the species
- Damage or destroy a breeding site or resting place used by bats

2.2 All bats and their roosts in the UK were previously fully protected under the Wildlife & Countryside Act 1981 (as amended). Amendments to the Act have removed most provisions as they relate to bats, however it remains an offence to:

- Intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for shelter or protection
- Intentionally or recklessly obstruct access to any structure or place used for shelter or protection

2.3 It is important to note that bat roosts are protected throughout the year, regardless of whether or not bats are present at the time. Under the Regulations, the offence of damaging or destroying a breeding site or resting place is subject to 'strict liability', i.e. an offence is committed irrespective of whether the causal act was deliberate or otherwise.

2.4 Where development is proposed that would result in an offence under the Regulations, a European Protected Species (EPS) statutory derogation licence (often termed 'EPS Mitigation Licence') will need to be secured from Natural England to permit an act that would otherwise be unlawful. Such a licence can only be granted following receipt of planning permission with all relevant conditions discharged, and where it has been demonstrated that specific statutory derogation tests have been met.

3.0 METHODS

- 3.1 The following survey methods, design, data analysis and interpretation have been undertaken with due consideration of the Bat Conservation Trust (BCT) guidelines 4th edition (Collins, 2023).

Desk Study

- 3.2 An ecological desk study was undertaken in July 2026 comprising a review of online resources and biological records centre data as detailed below.
- 3.3 The Multi-Agency Geographic Information for the Countryside (MAGIC) online database was reviewed to identify nature conservation designations within the following search radii:
- Bat-related Special Areas of Conservation (SAC) within 10km of the Site (including possible/proposed sites)
 - Other relevant data e.g. EPS licences relating to bats within 2km of the Site
- 3.4 A review was undertaken of the location of any such designations, their distance from and connectivity with the Site, and the reasons for their designation. This information was used to determine whether they may be within the proposed development's Zone of Influence (Zol).
- 3.5 Sussex Biological Records Centre (SXBRC) was contacted for details of bats. This information was requested for an area encompassing the Site and adjacent land within c. 2km of its central grid reference. This search area was selected to include the likely zone of influence upon bats.

Daytime Bat Walkover

- 3.6 A Daytime Bat Walkover (DBW) was undertaken on 2nd July 2026 by Theresa Stewart MCIEEM and Will Campbell in fine and dry weather conditions. The aim of the survey is to observe, assess and record any habitats suitable for bats to roost, commute and forage on-site and within the surrounding area.
- 3.7 As part of the survey, surveyors identified any structures, trees or other features that could be suitable for bats to roost in, and habitats that could be suitable for bats to use to commute, forage or swarm. Assigning potential to roosting features is discussed in the relevant sections below.
- 3.8 Following the survey, suitability of commuting and dispersal habitats are assigned under the following categories:
- 3.9 Either:

- **High** – Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.
- **Moderate** – Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
- **Low** – Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
- **Negligible** – No obvious habitat features on-site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
- **None** – No habitat features on-site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flightlines, or generate/shelter insect populations available to foraging bats).

Preliminary Roost Assessment (PRA) - Structures

- 3.10 A detailed external and internal inspection of the three buildings on-site was completed on 2nd July 2026, using high-powered torches, binoculars, ladder and endoscope as appropriate. The survey was carried out by Theresa Stewart MCIEEM (Natural England Class Licence WML-CL20, Registration Number 2025-86557-CL20-BAT) and Will Campbell.
- 3.11 External inspection focused on identifying potential bat access points to the interior of each structure and any external features that could potentially be used by crevice-dwelling species. Particular attention was given to window sills, window panes, hanging and roof tiles; as evidence is typically found in these locations.
- 3.12 The internal inspection involved a systematic search for bats or any evidence of their activity, in particular droppings and/or feeding remains within the loft voids of the buildings.
- 3.13 A description of the structures was made, including construction, condition (in respect of roosting, rather than building or structural integrity) and age (where known).

- 3.14 The aim of this inspection is to record direct (i.e. actual roosting bats) or indirect evidence of roosting bats (e.g. droppings), as well as the nature and number of features with 'potential' to support roosting bats. This includes consideration of structures to support bats whilst in hibernation.

Assessing 'Potential' of Buildings to Support Roosting Bats

- 3.15 All structures were assigned to one of five categories in respect of their 'potential' to support roosting bats, or the confirmation of any bat roosts identified. 'Potential' in this context is taken to be the broad suitability of features to support roosting bats, based upon the nature, condition or structure of such features, in the absence of confirmed evidence of roosting.
- 3.16 Assigning the following categories is intended to determine the effort of any further targeted survey or inspections which are necessary to prove presence or likely absence of roosting bats, rather than to assign importance to such features.
- 3.17 The following categories are assigned to structures and/or trees herein, Either:
- **High** – A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/ stable hibernation site.
 - **Moderate** – A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation made at this stage is irrespective of species conservation status, which is established after presence is confirmed).
 - **Low** – A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic/cool hibernation site, but could be used by individual hibernating bats).
 - **Negligible** – No obvious habitat features on site likely to be used by roosting bats. However, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
 - **None** – No habitat features on site likely to be used by any roosting bats at any time of year (i.e. a complete absence of crevices/ suitable shelter at all ground/ underground levels).

- 3.18 These categories above are allocated irrespective of the presence of a roost. If a roost is confirmed to be present then the categorisation still stands (because other roosts may be present but undiscovered) but 'confirmed roost' should be added, e.g. Low – confirmed roost; Medium – confirmed roost; High - confirmed roost.
- 3.19 The potential of a structure to support roosting bats is often influenced by its age and construction, thermal stability, lighting and levels of human activity. Furthermore, the proximity to foraging habitat - particularly woodland, parkland and wetland- as well as the presence of navigational routes (e.g. hedgerows, treelines and watercourses) influence both the potential for bats to roost, as well as the species which may roost. Professional judgement is therefore applied, based upon known factors which effect the potential of features to support roosting bats, insofar as determining the need or scope of further surveys or inspections. Consideration has also been given to the potential of a feature to support hibernating bats and any further works needed to confirm this.

DNA Analysis

- 3.20 During the PRA Inspections, bat droppings were collected from the buildings and sent for mixed-species sample DNA analysis by Ecotype Genetics, in order to identify which bat species were present.

Roost Surveys

- 3.21 Dusk emergence surveys are in progress at the site with three survey visits proposed MH1 and MH2 and one survey proposed on MH3. Surveys are being undertaken to confirm the presence/likely absence of roosting bats in association with the on-site buildings. In addition, the surveys aim to determine the character of any identified roosts, namely species present, number of roost bats and roost type (i.e. day, night feeding, maternity and transitory).
- 3.22 The dusk emergence surveys were undertaken for approximately 2 hours following British Summer Time (BST) sunset, with due consideration for the BCT good practice guidelines. At the time of writing one bat emergence survey had been undertaken by Theresa Stewart CIEEM (Natural England Class Licence WML-CL20, Registration Number 2025-86557-CL20-BAT) and Dave Barker (Natural England Class Licence WML-CL18, Registration Number 2026-90088-CL18-BAT), Will Campbell and Jasmine Carpaccio in suitable weather conditions (see Table 1).

Table 1. Bat roost survey timings and weather conditions

Survey Date	Sunset / Sunrise Time	Start Time	End Time	Temp. (°C)		Cloud Cover (oktas)		Wind (Beaufort Scale)		Precipitation
				Start	End	Start	End	Start	End	
02/07/2026	21:19	20:04	23:19	22	21	0	0	0	1	None

- 3.23 During the survey, the surveyors watched for any bats leaving or entering parts of the buildings, and using key flight lines. Surveyors were equipped with Batlogger M/M2 detectors which allowed for recording and analysis of bat contacts. A note was made of all bat passes, along with the time, species and any information regarding behaviour, including direction of flight, and activity e.g. foraging/commuting.
- 3.24 To assist surveyors and allow for reliable observations of the buildings for the duration of the survey, Night Vision Aids (NVA) were used to film any bats emerging from buildings MH1, MH2, MH3. Night Vision Aids comprised one Canon XF100 HD camcorder and three Canon XA10 Camcorders, one Nightfox Monocular and a thermal imaging monocular linked to a Samsung tablet. In addition, each camera was paired with two Nightfox XB5 infrared torches used to provide additional IR illuminance and additional 96 LED infrared illuminator lamps were used as required to light the buildings. Full spectrum bat detectors Batlogger M x 4 and M2 x 2 were used alongside these rigs to record bat calls and assist with later species identification.
- 3.25 Night Vision Aids were deployed around the buildings to ensure that all aspects were recorded. A still shot from each NVA was taken at the end of the survey to provide evidence of the camera coverage/field of view at the darkest point of the survey and appropriate level of illuminance, as required in line with best practice guidance.
- 3.26 The positions of the surveyor(s) and the Night Vision Aids around the building/tree during the survey are illustrated on the Bat Roost Survey Plan (CSA/8141/100) at the end of this report.

Analysis of Data

Call Analysis

- 3.27 Bat calls were recorded using Elekon Batlogger M and M2 detectors. This detector automatically records ultrasonic signals with a one second delay between recordings. Recordings of bat contacts were subsequently analysed using BatExplorerPro software, with sonograms reviewed to confirm bat identification to genera, or where possible, species level.

- 3.28 Each of the recorded files, which contain a variable number of call 'pulses', was designated a 'bat contact'. At the point of contact, each sound file is assigned a GPS location.
- 3.29 For analysis of data recorded during static monitoring, quantitative analysis of bat activity was then undertaken by calculating the average bat contacts per hour on each night monitored, for each species.
- 3.30 Bat activity can show considerable inter-night variability and is dependent on a number of variables, including temperature, wind, and seasonality, amongst others. To account for this variability the median values for the average hourly bat contacts per night are reported, rather than a mean value which would misrepresent the average activity.

Reviewing Video Footage

- 3.31 Analysis of Night Vision Aid footage was carried out using VLC Media Player and Canon Utility software at a review speed of no more than 1.5x to avoid skipping of frames and any emergencies. A still shot from each Night Vision Aid was taken at the end of the survey to provide evidence of the camera coverage/field of view at the darkest point of the survey and appropriate level of illuminance, as required in line with best practice guidance (see the end of this report).

Limitations

- 3.32 The surveys were commissioned in late June, and were not able to commence before July 2026, which is already mid way through the bat survey season, and as such the May and June survey months were missed. As this survey has been commissioned to update existing bat data at this site, it is considered that the survey timings are not detrimental to being able to appropriately assess the buildings and bat roosts present.
- 3.33 It is acknowledged that the quantum of bat contacts recorded during a survey may not give a true reflection of the abundance of bats using the Site. For example, a single bat foraging close to a detector may trigger several hundred activations in the course of one night. However, this activity level does provide a proxy for the level of use by bats, and therefore its relative importance.

Evaluation

- 3.34 As bat surveys are currently on going on the site, it is not possible at this stage to appropriately evaluate the findings to determine the number, species of bat and type of bat roosts present, the below will be completed follow the completion of all planned surveys.
- 3.35 Any bat roosts identified during the surveys have been evaluated in line with Reason and Wray (2023), which provides guidance on assessing the

conservation value of bat roosts according to type and species. This guidance is summarised in Tables X – X below.

Table 2. Categorising bats by rarity (adapted from Reason and Wray, 2023)

Rarity Within Range*	Species
Widespread	Common pipistrelle Soprano pipistrelle Brown long-eared
Widespread in many geographies, but not as abundant in all	Whiskered Brandt's Daubenton's Natterer's Noctule
Rarer or restricted distribution	Lesser horseshoe Serotine Leisler's Nathusius' pipistrelle
Rarest Annex II species and very rare	Greater horseshoe Bechstein's Barbastelle Grey long-eared

*N.B. Only the relevant geographic location has been reproduced within the table. [CHECK](#)

Table 2. Categorising Bats by Geographic Distribution and Rarity (adapted from Reason and Wray, 2023) [Adapt as necessary for geographic location](#)

Geographic Location	Rarity Category			
	Widespread	Widespread in many geographies but not all	Rarer or restricted distribution**	Rarest Annex II species and very rare
Southern England *	Common pipistrelle	Whiskered	Alcathoe's	Greater horseshoe
		Brandt's	Serotine	
	Soprano pipistrelle	Daubenton's	Leisler's	Lesser horseshoe
	Brown long-eared	Natterer's	Nathusius' pipistrelle	Bechstein's
		Noctule		Barbastelle
				Grey long-eared

*N.B. Only the relevant geographic location has been reproduced within the table. [Be sure to check any local guidance relating to your geographic location](#) (for example some areas of Worcestershire and Herefordshire would be classed as Wales or South-West rather than West Midlands).

**Species not included in the table above are considered to be 'rarer' in line with guidance.

Table 3. Valuing importance of roosts based on rarity and roost characterisation (adapted from Reason and Wray, 2023)

Roost Type*	Rarity Category			
	Widespread	Widespread in many geographies but not all	Rarer or restricted distribution	Rarest Annex II species and very rare
To be determined	TBC		TBC	

*N.B. Only the relevant roost type has been included in the table above.

4.0 RESULTS

- 4.1 The site comprises a moated house and gardens within the centre of an active construction site within phase 1 Mowbray, North Horsham residential and mixed use development.

Data Search

- 4.2 A total of 212 bat records were identified within the search area, dating from 1994 to 2025. These include the following species: common pipistrelle *Pipistrellus pipistrellus*, noctule *Nyctalus noctula*, Daubenton's bat *Myotis daubentonii*, serotine *Eptesicus serotinus*, brown long-eared bat *Plecotus auritus*. The closest records are of pipistrelle species c. 0.7km east from the Site, recorded using a bat detector in 2014. The closest recorded bat roost was situated approximately 940m south of the Site and was recorded as Chiroptera.
- 4.3 The site does not fall within the impact risk zone of any Special Areas of Conservation designated for bat species.
- 4.4 Historical bat surveys undertaken by Bioscan in 2009 and 2015 confirmed the presence of common pipistrelle and brown long eared day roosts within MH1 and MH2 (Mowbray, Environment Statement Appendix 12.19, ref E1585R1/Bat/V1, Bioscan 2016).

Daytime Bat Walkover

- 4.5 The habitats on the site include modified grassland lawns, ornamental scrub planting, watercourse, and trees, tall ruderal vegetation and scrub along both banks of the moat. The habitats offer a range of habitats with suitability for foraging bat, however at the time of survey this site is located within an active construction site, which may negatively impact bat presence on the site.

Preliminary Roost Assessment (PRA) – Structures

- 4.6 Three buildings were subject to a preliminary roost assessment on 2nd July 2026. The findings of the assessment are outlined in table 4 below.

Table 4: Preliminary Roost Assessment (Existing Structures) Summary

Structure reference	Description, bat roosting features and evidence	Bat roost suitability
MH1 Farmhouse	<u>Description</u> A two storey red brick farm house originally constructed in the 17th century which had been extensively reconstructed and modernised over time. with clay hanging tiles on first floor across all elevations. Roof had a complex structure formed of a horizontal E shaped double pitched roof with infill flat roof sections between the three pitches. Stone roof tiles were present on the south and east elevations and clay tiles to the rest of the building. <u>External Features</u> Both the roof tiles and hanging tiles had gaps suitable to allow bat ingress. Birds were recorded nesting in the front of the property exterior. <u>Internal Features</u> Internally, three voids were identified and subsequently surveyed: <u>Void 1</u> Main roof void of building, up to 3m in height with timber structure and bitumen felt sarking and rock wall insulation. See Photographs 3 & 4. Bat droppings consistent with long eared bats were present in three distinct clusters of approximately 400 droppings each, located below the ridge beam. Mouse droppings, and old bird and wasps nests were also present. <u>Void 2</u> Eaves void off of one of the bedrooms with timber beams and bitumen sarking, mouse droppings were evident, no bat evidence was found. See Photograph 5. <u>Void 3</u> Void over downstairs room into flat roof section. No evidence of bats present. The building was historically a confirmed roost for long eared bats and common pipistrelles, as long eared bats are known to use roosts year round, it is likely that this building could also be used for hibernating bats as well as day roosting bats.	Historical Confirmed Roost
MH2 Triple Garage & Annexe	<u>Description</u> Two storey triple garage with annex flat upstairs. Building of red brick construction with double pitched half hipped roof with clay roof tiles and clay hanging tiles to north and south gable ends. <u>External features</u> Both the roof tiles and hanging tiles had gaps suitable to allow bat ingress. <u>Internal features</u> The roof was partially vaulted with skylights in east and west elevations providing light ingress into the annexe flat. A half height roof void was present above the skylights. Eaves voids were also present on both east and west elevations.	Historical Confirmed Roost

Table 4: Preliminary Roost Assessment (Existing Structures) Summary

Structure reference	Description, bat roosting features and evidence	Bat roost suitability
	<u>Void 4-6</u> All voids were lined with bitumen sarking with insulation board installed between the rafters. The main roof void was not boarded so was not able to be fully accessed, however from the vantage point observed. Approximately 10 bat droppings were present on the loft hatch of the main roof void 4. No bat droppings were identified within the eaves voids 5 & 6. The eaves voids had no bat evidence present. All three voids had evidence of mice droppings throughout. The hanging tile feature has the potential to be used as a day roost and hibernation roost.	
MH3 Outbuilding	<u>Description</u> A small single storey brick outbuilding with double pitched clay tiled roof. No internal access was possible; however, the interior was readily visible through the windows and no evidence of bats was observed. <u>External features</u> Gaps under clay roof tiles. <u>Internal features</u> Open to the ridge and ivy growing under the roof and down the interior walls.	Low Suitability

DNA Analysis

- 4.7 Samples of bat droppings were sent for multi-species DNA analysis undertaken by Ecotype Genetics. Samples were taken from the farmhouse MH1. Results of the DNA analysis are set out in Table 5 below.

Table 5. DNA analysis results

Sample Area	Date Sample Collected	Species Result
MH1 farmhouse void 1		TBC

Roost Surveys

Emergence Survey 1: 2nd July 2026

- 4.8 A plan of the bat surveyor locations is included at the end of this report. Data analysis of sound and video files is ongoing. However, it was confirmed during the survey that there were common pipistrelle bats emerging from the southern elevation of MH2. Footage review will confirm numbers.
- 4.9 Common and soprano pipistrelles were recorded foraging over the site and along the moat throughout the survey, other species such as long

eared bat and myotis species were potentially recorded, analysis of the sound files is yet to be undertaken to confirm this.

5.0 DISCUSSION

Assessment

- 5.1 Update survey work is ongoing at Moat House in order to establish current usage of the site by bat species. To date the preliminary roost assessment and one emergence survey have been undertaken.
- 5.2 Historical bat roosts were present on site for common pipistrelle and long eared bats, in the farmhouse MH1 and triple garage and annexe, MH2.
- 5.3 The survey work to date in 2026 has identified bat droppings within MH1 indicative of long eared bats and common pipistrelle bats emerging in low numbers from the southern gable of MH2. Further analysis of the data is required to determine any additional results detail.
- 5.4 A further two bat emergence surveys are proposed for MH1 and MH2 and bat dropping DNA analysis and ground level tree assessment for bats.

Mitigation

- 5.5 Historical roosts are present in MH1 And MH2, if 2026 surveys confirm the continued presence of bat roosts within these buildings a European Protected Species (EPS) licence from Natural England is likely to be required to enable works to these buildings. No final licensing decisions can be made, or any licence issued, until the development has obtained all necessary consents in order to proceed, with any conditions relevant to wildlife discharged.
- 5.6 The following measures will be incorporated into the method statement of the EPS licence application, in order to mitigate the impact on bats as a result of the proposed works and provide adequate replacement roosting opportunities:
 - Three Schwegler 2F bat boxes will be installed in retained trees prior to commencement of demolition;
 - A licensed bat ecologist will provide an induction for demolition contractors and other site workers prior to the commencement of demolition works on-site to make them aware of the possible presence of bats, their legal protection and of working practices to avoid harming bats;
 - Any features on MH1 and MH2 with potential to support bats (e.g. roof tiles, ridge tiles, soffits, gutter fascia boards) will be searched and dismantled under supervision and direction from a licensed bat worker, ideally within the bat active season (April-September i.e. prior to bat hibernation), but outside of the summer period (May to August);

- An endoscope and other such equipment will be used to investigate crevices (e.g. under tiles) where appropriate and possible;
- In the event that any bats are found during supervised works the licensed bat worker will catch them by hand, or a hand net, and place them in a breathable holding bag for immediate relocation to one of the Schwegler 2F bat boxes on nearby retained trees. Care will be taken to move the bat quickly and with minimal handling. Injured bats will be immediately taken into care (as directed by the Bat Worker's Manual, 2004). Details of a local bat carer/hospital will be carried by the licensed bat worker throughout the works;
- Once potential roost areas have been stripped under supervision, further work will then proceed swiftly without the supervision of an ecologist. In the unlikely event that a bat is found during any of the building works when the named ecologist is not present, contractors will be instructed to stop work immediately and contact the named ecologist for advice. Other contractors are explicitly forbidden from handling bats.

5.7 The hanging tile features on MH1 and 2 are to be retained. As further enhancement on site integrated bat roosting units (e.g. Bird Brick Houses Bat Box; or Habibat 001 Bat Box) will be incorporated into the walls of new buildings on-site (faced with matching brick, so as to be inconspicuous), as close to the original roost locations as possible.

5.8 Any new lighting scheme for the Site will need to be designed to avoid illuminating any of the bat roosting boxes/integrated units that are to be installed as part of mitigation, as well as minimising illumination of the moat and habitats associated with the moat surrounding the site which has been shown to be used bats as a commuting corridor/foraging area.

6.0 CONCLUSIONS

- 6.1 Buildings MH1 and MH2 are due to be refurbished and remodelled under current design proposals. As these buildings have had historical bat roosts, if bat roosts are confirmed present during 2026 surveys, the refurb and demolition works will need to be carried out under a European Protected Species Mitigation Licence from the Government Body Natural England. Surveys are ongoing to determine the current status of these bat roosts.
- 6.2 The proposals will result in the demolition of the outbuilding MH3 which has not historically had any evidence of roosting bats, as such there are no perceived constraints to the demolition of this building with regard to bats. However, survey data from the emergence survey is still to be analysed and this may change following infra red camera footage review.
- 6.3 The moat, trees along the moat and the ornamental hedgerow in the garden offer suitable foraging habitat for bat species. Any new lighting scheme will need to be designed to avoid illuminating the moat and habitats associated with it and the hanging tiles on the retained buildings and any installed bat boxes. This will minimise disturbance to foraging and commuting bats and avoid lighting any potential bat roost features which would constitute as disturbance under the legislation protecting bats.

7.0 REFERENCES

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Appendix A

Bat Survey Plan



Site boundary

Building Suitability

High - Historic Roost

Low

PRA features

Cracks in exposed wood porch

Gaps under hanging tiles

Lifted tiles

Missing ridge tile

Missing tile

bat droppings

Field of veiw

Survey Locations



Contains Google maps © Google 2026.
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Appendix B

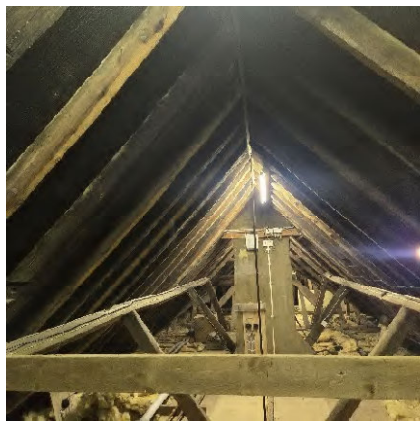
Photographs



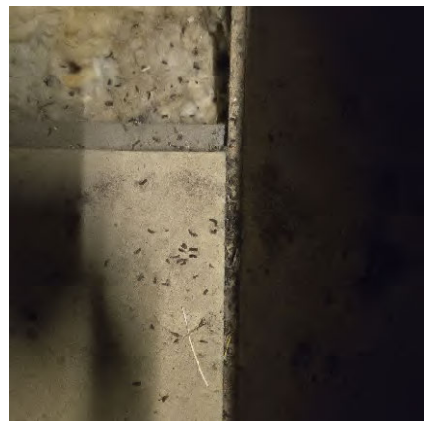
Photograph 1. Farmhouse (MH1) front (south) elevation.



Photograph 2. Farmhouse (MH1) rear (north) elevation.



Photograph 3. MH1 Roof Void 1



Photograph 4. MH1 void 1, bat droppings



Photograph 5. MH1 roof void 2.



Photograph 6. Garages (MH2), west elevation



Photograph 7. Garages (MH2) north elevation.



Photograph 8. MH2 internal loft void



Photograph 9. Outbuilding MH3, north west corner.



Dixies Barns, High Street,
Ashwell, Hertfordshire
SG7 5NT

t 01462 743647
e ashwell@csaenvironmental.co.uk
w csaenvironmental.co.uk

Office 20, Citibase,
95 Ditchling Road,
Brighton BN1 4ST

t 01273 573871
e brighton@csaenvironmental.co.uk
w csaenvironmental.co.uk

3 Ripple Court,
Brockridge Park, Twynning,
Tewkesbury GL20 6FG

t 01386 751100
e tewkesbury@csaenvironmental.co.uk
w csaenvironmental.co.uk

Wizu Workspace, 32 Eyre
St, Sheffield City Centre,
Sheffield S1 4QZ

t 07838 290741
e sheffield@csaenvironmental.co.uk
w csaenvironmental.co.uk

Worting House,
Church Lane, Basingstoke,
RG23 8PY

t 01256 632340
e basingstoke@csaenvironmental.co.uk
w csaenvironmental.co.uk