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Preliminary Ecological Appraisal

Site Name

Delspride, Cowfold

Client

Mr and Mrs Bryant

Issue Date

26th November 2025

Author

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About the Author

This report has been prepared by Lara Hulbert, an Assistant Ecologist at The Ecology Co-op. As a Full Qualifying member of the Chartered Institute for Ecology and Environmental Management (CIEEM) and as Chartered Ecologist through this body, she is bound by their code of professional conduct.

About the Reviewer

This report has been reviewed by Emma Baker, who is a Senior ecologist with eight years experience. She holds Level 1 great crested newt and hazel dormouse survey licenses. As a Full member of the Chartered Institute for Ecology and Environmental Management (CIEEM), she is bound by their code of professional conduct.

Report Summary

Purpose	The Ecology Co-op was commissioned by Mr and Mrs Bryant to undertake a Preliminary Ecological Appraisal Delspride, Cowfold further to a proposal to demolish the chicken barn and two smaller structures and construct two new residential dwellings in their place.
Context	The habitat on site comprises hardstanding and modified grassland, with a Priority Habitat deciduous woodland parcel bordering the eastern boundary and a pond at the north. There is a residential dwelling on site, with a large, disused chicken barn and two smaller structures adjacent. To the south of the site is horse pasture and industrial buildings to the west.
Key findings	• A habitat suitability index (HSI) assessment was undertaken on Pond 1 which was assessed as having 'moderate' suitability for great crested newts. It is recommended that an eDNA survey of this pond is conducted. • A bat scoping assessment on the chicken barn identified it to hold 'low' bat roosting potential. • A bat scoping assessment on the mobile home identified it to hold 'low' bat roosting potential. • The site is unlikely to support badgers and reptiles, but hedgehogs may be present within the adjacent woodland.
Recommendations	The pond on site will not be directly impacted by the proposed development, however mitigation measures outlined in section 4.7 must be followed to ensure no harm comes to amphibians during the construction phase and the pond does not become polluted. In accordance with the Bat Conservation Trust guidelines, a single bat emergence survey is required for the chicken barn to determine the importance of this building to bats. All surveys must be conducted during the peak activity period between May and August. Precautionary mitigation for badgers, breeding birds, reptiles and hedgehogs is outlined in section 4 and must be followed to prevent a breach of legislation.
Are further surveys required?	Yes • One bat emergence survey of chicken barn • One bat emergence survey of mobile home • eDNA of the pond directly adjacent to the site

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1 INTRODUCTION

1.1 Purpose of the Report

The Ecology Co-op has been commissioned to undertake a Preliminary Ecological Appraisal (PEA) of land at Delspride, Cowfold by Mr and Mrs Bryant. This report presents the findings of a walkover survey undertaken by Jenna Fairchild, a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and Lara Hubert a Qualifying member of CIEEM on Wednesday the 5th of November 2025. It provides details on the potential for any protected/notable species and/or habitats to be present at the site and a simple assessment of the potential ecological constraints and opportunities in relation to the partial redevelopment of the site. Recommendations for further surveys that are likely to be required to inform a planning application and Ecological Impact Assessment (EcIA) of the proposal are provided where necessary, and possible measures to avoid, mitigate and/or compensate for significant adverse effects are summarised. The potential to incorporate ecological enhancement measures as part of the scheme is discussed, in addition to any requirement to achieve biodiversity net gain.

This PEA report is designed to inform the client and their team (as appropriate) about the initial findings of the site walkover and desk study research in relation to the site proposals, highlighting the key ecological constraints and opportunities, and any further survey requirements. It is not intended for submission in support of a planning application but can be used to inform a future Ecological Impact Assessment (EcIA).

1.2 Background

This site measures approximately 0.49ha and is situated 2.25km to the southeast of Cowfold, West Sussex. Located in a rural setting, the site comprises hardstanding and horse pastures, with a woodland parcel to the east and farmland to the north, south and west. There is one residential property on site, and the fields are currently used for horse grazing. There is a pond to the north of the site. The full address and central grid reference for this site is Delspride, Cowfold, West Sussex RH13 8BB, TQ 23552 21689. Figure 1 shows site location.

The proposed development includes demolition of the large chicken barn, adjacent shed and kennel structures, followed by the construction of two new residential dwellings in their place. Figure 2 shows the proposed plans provided by the client.



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

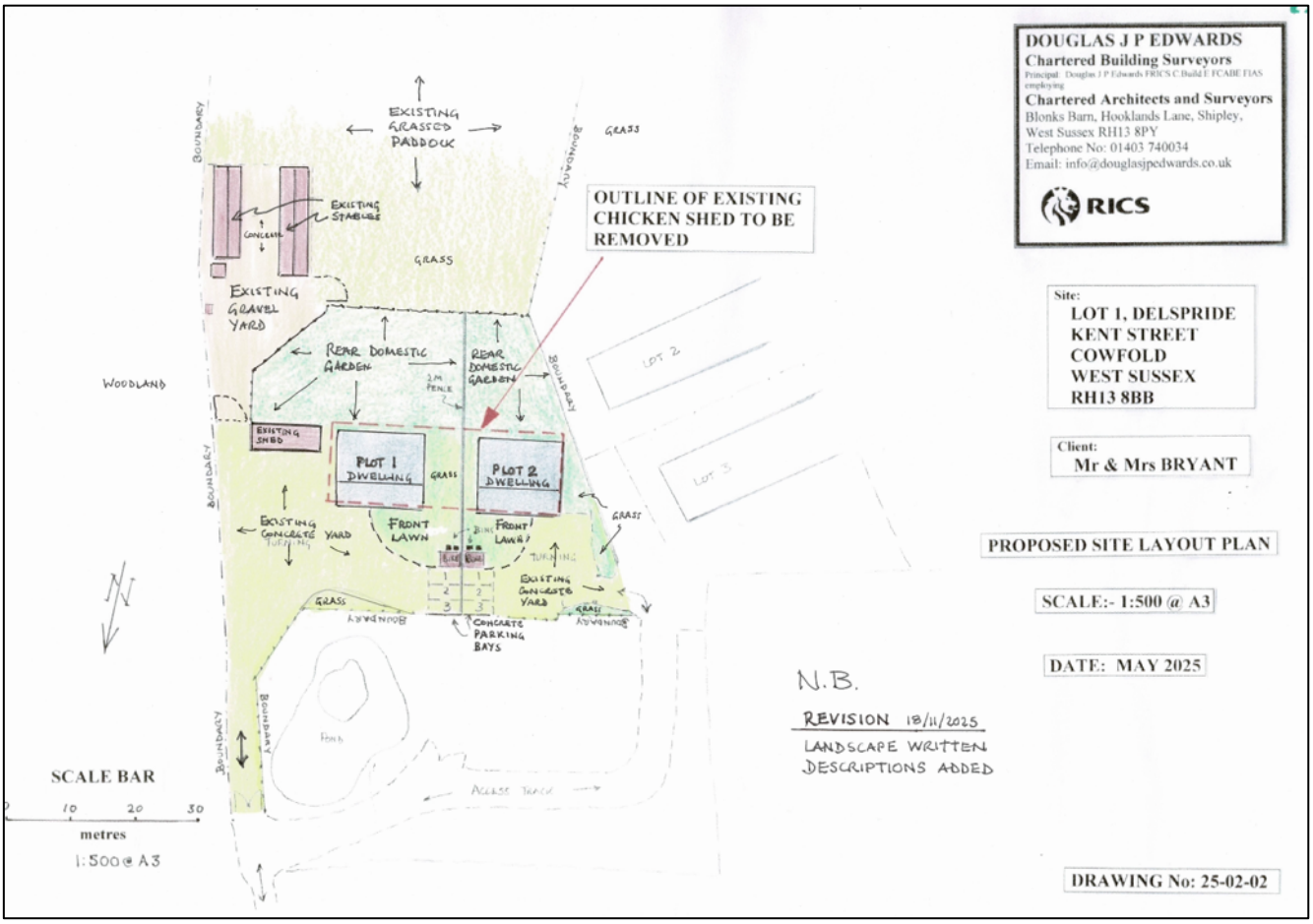

Figure 2. Proposed development plans produced by Douglas J P Edwards Chartered Building Surveyors. Dwg no. 25-02-02. Dated May 2025.

1.3 Policy and Legislation

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

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

2 METHODOLOGY

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

2.1 Desk Study

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

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

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

2.2 Field Survey

A site walkover survey was undertaken on the 5th of November 2025 during which the habitats contained within the site were described and evaluated. Since this site is relatively small in scale and contains limited semi-natural habitat diversity, it was not considered necessary to undertake comprehensive UKHab mapping of the site. All habitat types contained within the site, together with the dominant botanical species and indicators of important habitat types, such as ancient woodland or unimproved grassland, have simply been listed and described where identified.

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

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

or other potentially valuable ecological features were recorded.

Details of the preliminary survey methods for each legally protected species are given below. Any site-specific limitations to the survey, e.g. access constraints or seasonal constraints, are set out in section 3.12.

2.3 Badgers

Badgers *Meles meles* exploit a range of habitats, including gardens, coniferous woodland, deciduous woodland, mixed woodland and arable land. They live in an underground system of tunnels and nesting chambers, known as a sett, with territories ranging from 30ha to 150ha or more.

Habitats within the site and surrounding area were broadly assessed for their potential to support badgers. Any signs of badger activity, for example setts, footprints, latrines, well-worn paths and foraging marks, were recorded. Further surveys were recommended as appropriate.

2.4 Bats

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

A detailed building inspection was carried out in accordance with best practice guidance as set out by the Bat Conservation Trust[3]; the inspection comprised identification of potential access points and 'Potential Roost Features' (PRFs) that bats could use and any evidence indicating the presence of bats using the building, such as rub marks, feeding remains, staining or droppings. The survey included a ground-based external inspection around the chicken barn and shed, and internal inspection of any enclosed loft spaces or roof voids, where safe access was possible.

One oak *Quercus* sp. tree was also inspected for its potential for bats.

The potential for roosting bats for each feature, or group of features was assessed as negligible, low, moderate, or high, in accordance with best practice. Any evidence confirming the presence of bats was clearly recorded including photos and samples taken (e.g. droppings), where appropriate. Further surveys are recommended.

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

2.5 Breeding Birds

Birds can use a wide range of natural and artificial habitats when breeding, including trees, hedgerows, fields, houses and garden sheds. The habitats contained within the site and adjacent areas were broadly assessed for

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

their potential to support important bird species/assemblages, and breeding birds. Any birds identified during the site visit were recorded. Special attention was paid to notable species such as red-listed Birds of Conservation Concern[4] and those species afforded special protection on Schedule 1 of the Wildlife and Countryside Act (1981). Further surveys are recommended as appropriate.

2.6 Dormice

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

Further surveys are recommended as appropriate in accordance with best practice guidance[5].

2.7 Great Crested Newt

Great crested newts breed in ponds during the spring and spend the rest of the year feeding on invertebrates primarily in semi-natural habitats including woodland, hedgerows, marshes and tussocky grassland. A desk study was undertaken to identify ponds and wet ditches within 500m of the site that might support breeding great crested newts. Where access permission was granted, or ponds could be viewed from public roads or footpaths, the ponds were assessed for their potential to support great crested newts using the Habitat Suitability Index (HSI) (Oldham et al 2000)[6]. The value of the site for terrestrially foraging great crested newts and any features that might be used by hibernating newts has also been assessed.

Further surveys are recommended as appropriate, in accordance with best practice guidance (English Nature 2001)[7].

2.8 Reptiles

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

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

[4] Stanbury, A., Eaton, M., Aebischer, N., Balmer, N., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. (2021). Birds of Conservation Concern 5: the status of bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man. British Birds 114, pp 723-747.
[5] Bright, P., Morris, P. and Mitchell-Jones, T. (2006). *The dormouse conservation handbook 2nd Ed.* English Nature, Peterborough.
[6] Oldham, R.S., Keeble, J., Swan, M.J.S. and Jeffcote, M. (2000). Evaluating the suitability of habitat for the great crested newt (*Triturus cristatus*). *Herpetological Journal* 10, 143-155.
[7] English Nature (2001). *Great Crested Newt Mitigation Guidelines*. English Nature, Peterborough.

recommended as appropriate.

2.9 Riparian Wildlife

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

2.10 Other Notable Species

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

3 BASELINE CONDITIONS

3.1 Designated Sites and Granted EPS Licences

A section of the High Weald Area of Outstanding Natural Beauty lies within 2km of the site to the north. There are no further statutory designated sites within 2km of the application site.

There are three granted EPS licences for mitigation projects within 1km of the site boundary. The closest EPS licence to the site concerns common pipistrelle *Pipistrellus pipistrellus,* see Figure 4.

There is Priority Habitat deciduous woodland immediately adjacent to the east of the site, and further woodland, including ancient woodland in the wider landscape.

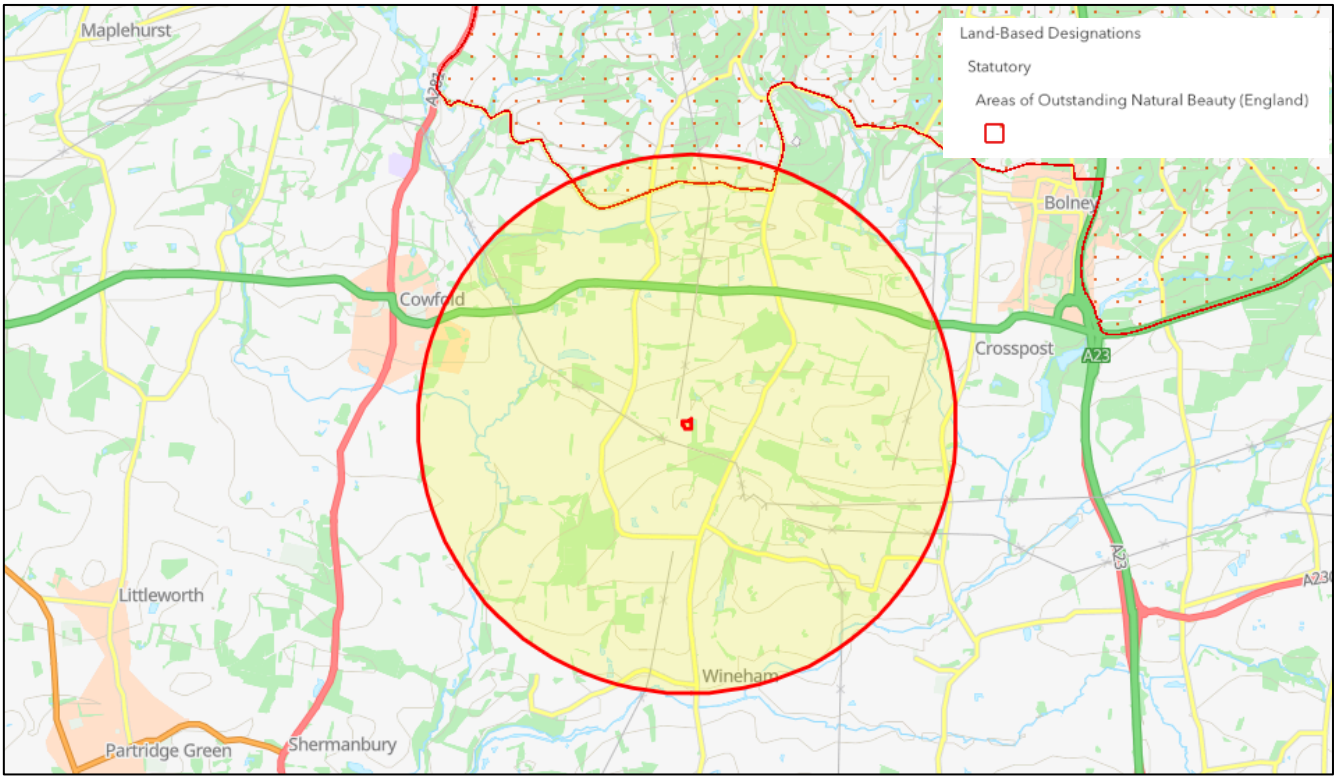

Figure 3. Designated sites within a radius of 2km of the application site. Image produced courtesy of Magic maps (http://www.magic.gov.uk/, contains public sector information licensed under the Open Government Licence v3.0).

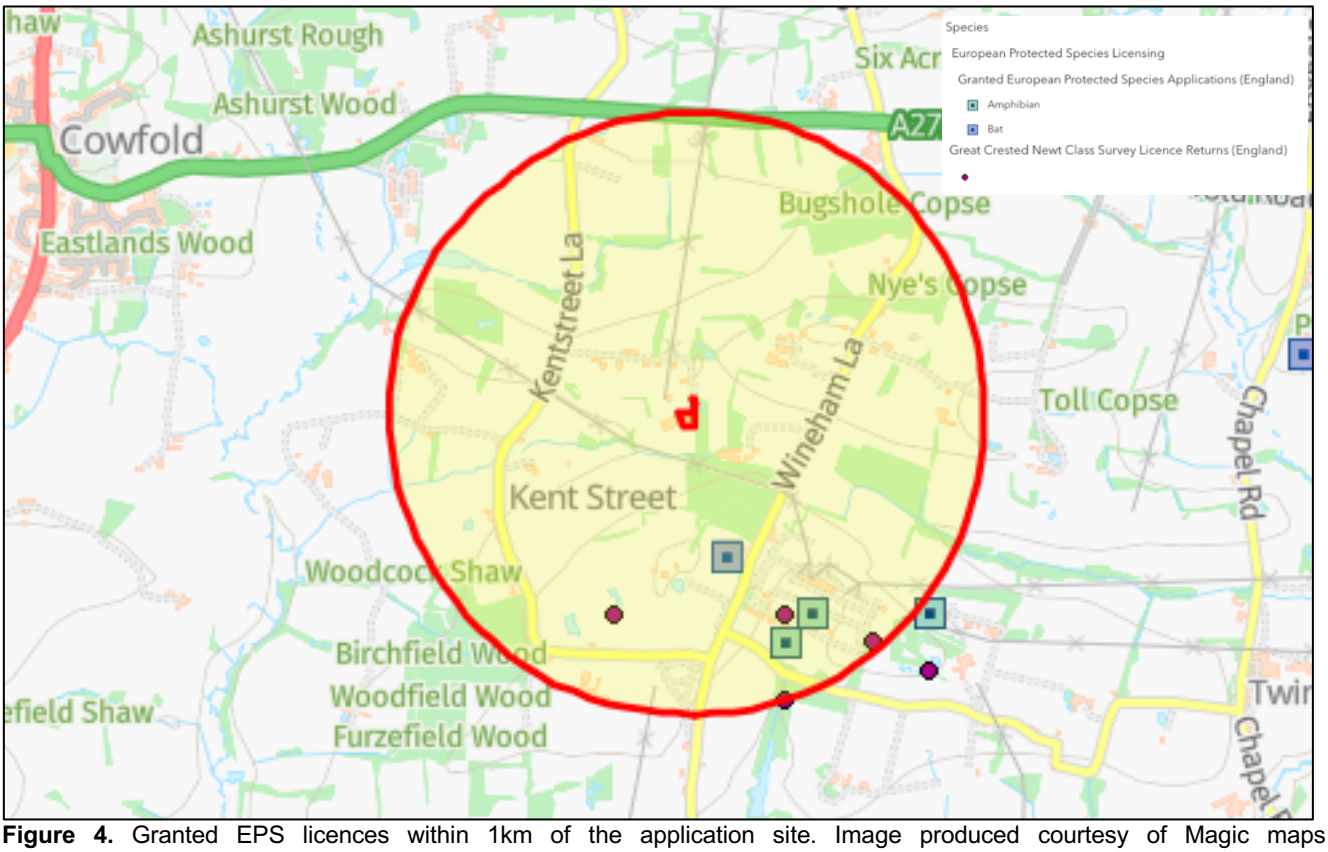

Figure 4. Granted EPS licences within 1km of the application site. Image produced courtesy of Magic maps (http://www.magic.gov.uk/, contains public sector information licensed under the Open Government Licence v3.0).

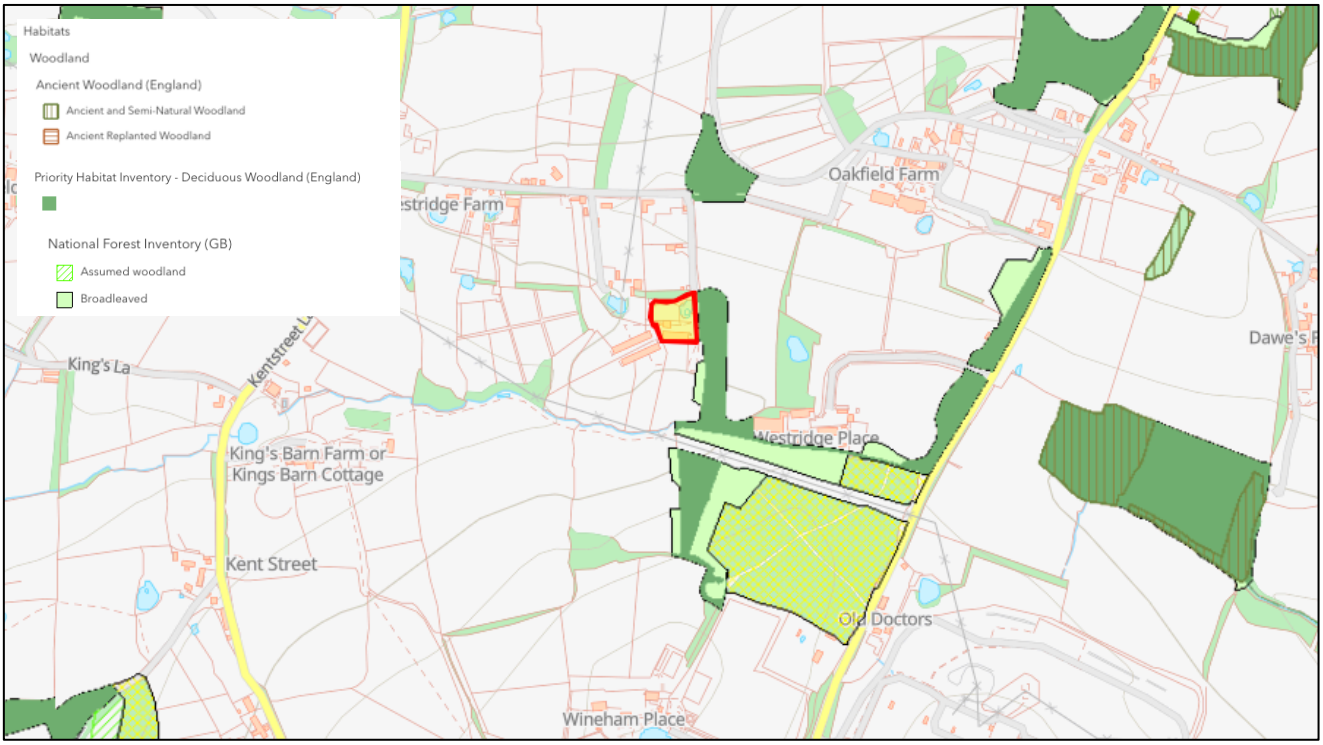

Figure 5. Habitats of importance for nature conservation. Image produced courtesy of Magic maps (http://www.magic.gov.uk/, contains public sector information licensed under the Open Government Licence v3.0).

3.2 Habitats

This site comprises a residential dwelling with an adjacent parcel of species-poor, modified grassland garden space. The species composition of the grassland areas include common nettle *Utica dioica,* curled dock *Rumex crispus,* wood-sorrel *Oxalis acetosella,* cow parsley *Anthriscus sylvestris,* red fecue *Festuca rubra,* perennial rye-grass *Lolium perenne,* spurge *Euphorbia* sp., white clover *Trifolium repens,* dandelions *Taxacum spp,* daisy *Bellis perennis,* bristly ox-tongue *Helminthotheca echioides,* creeping buttercup *Ranunculus repens,* creeping cinquefoil *Potentilla reptans,* dove's foot crane's-bill *Geranium molle,* common ragwort *Jacobaea vulgaris,* creeping thistle *Cirsium arvense,* spear thistle *Cirsium vulgare* and ribwort plantain *Plantago lenceolata.*

The majority of the site is paved, sealed hardstanding with a large chicken barn in the middle of the site and two smaller structures in front. One of these structures is a storage shed and one is used as a dog kennel. Along the northern boundary is a mobile home, a storage container (referred to as 'Site Office') and an industrial building. To the north of the site is horse pasture comprising modified grassland. This field is bordered by more hardstanding to the east and west. South of the site is further horse pasture. Along the eastern boundary of the site is a parcel of Priority Habitat deciduous woodland which is separated from the site by chicken wire fencing. Immediately north of the footprint of the proposed dwellings but enclosed by the existing access road to be utilised is a pond which is discussed in section 3.7 below.



Photograph 1. Pathway from the site entrance with grassland strips on either side.



Photograph 2. Parcel of modified grassland.



Photograph 3. Residential dwelling and associated garden space comprising modified grassland.



Photograph 4. Area of hardstanding.



Photograph 5. Southern elevation of chicken barn and shed. Hardstanding used for vehicle parking.



Photograph 6. Southern elevation of chicken barn. Horse pasture of modified grassland and bare ground.



Photograph 7. Northern elevation of chicken barn and hardstanding.



Photograph 8. Off-site rubble pile and ruderal habitat.

3.3 Badgers

No signs of any badger activity were seen during the survey assessment, though there are habitats of value for this species within the site and surrounding landscape, including the woodland along the eastern boundary. It is likely that if any setts were situated within 30m of the site boundary, then evidence of badger activity would have been observed.

Records of badgers are not provided by the records centre, due to the sensitive nature of this information.

3.4 Bats

The woodland to the east of the site may be of value for bats as potential commuting routes that connect the site to high value foraging habitats in the wider landscape. The habitats on site consist of hardstanding and modified grassland which holds low ecological value for bats.

Table 1 presents the descriptions and assessments of the buildings and trees on site for their suitability to support roosting bats. Photographs of the buildings are shown in section 3.2 above and in Appendix 3 of this report.

The biodiversity records search returned 21 records of bats within 1km. This only included records of two species: common noctule *Nyctalus noctula,* and soprano pipistrelle *Pippistrellus pygmaeus.*

Table 1. Potential roost features for bats across the buildings on the site.

Building / Tree	Description of features	Assessment of suitability
Building 1 – Chicken barn (exterior)	A single-storey, detached barn with breezeblock base walls, weatherboarded uppers and a pitched corrugated metal roof with a chipboard layer underneath. Behind the weatherboarding there is a layer of plywood creating a cavity between the wall and the main internal space. The barn also has a lean-to on the southern elevation.	Low bat roost suitability

	The eastern gable end has numerous gaps and holes in the weatherboarding; some are quite large. Areas of the weatherboarding have lifted and come away from the wall creating space behind. Gaps have also formed beneath the flashing. There is an overhang along the northern elevation which contains numerous gaps that lead directly into the barn. Where the structural beams meet the wall, small gaps are present, however these are heavily cobwebbed and full of debris. Many of the gaps along the weatherboarding sit at chest height or lower and the previous windows have been covered with chicken wire, preventing access. Similarly to the eastern gable, the western gable end contains multiple holes in the weatherboarding and a few gaps underneath the flashing. There are holes in the breezeblocks which don't lead anywhere and are very exposed crevices. There is a possible gap between the doorframe post and wall of the main barn which could not be accessed. The lean to on the southern elevation is structurally sound and single-skinned. There is open access into the structure which has a low ceiling , approximately 1.5m in height. There are fan access turrets along the roof ridge which look as though they give internal access into the structure, however upon internal inspection these have a mesh lining. The turrets may support crevices, however, they cannot be fully accessed to assess them. The ridge plating is lifted in some areas, however this is single skinned and metal. This is poorly thermoregulated and would be too hot for bats in the summer.	
Building 1 – Chicken barn (interior)	The main void of the barn could be viewed but not accessed due to health and safety concerns; however, much of the void was visible with a high-powered torch. There are some access points into the main void from outside, however, there was very heavy cobwebbing across the entire void ceiling indicating little activity inside.	Low bat roost suitability
Building 2 – Mobile home	Brick and concrete build with corrugated roof in good condition with limited superficial features present. There are gaps within the roof at the ridge from the corrugated roof and some blind spots which could not be accessed from the ground.	Low bat roost suitability
Building 3 – Industrial building	Single skinned, metal building with tarpaulined overlay roof. No superficial features present, however internal access was restricted.	Negligible bat roost suitability.
Building 4 – Site office	Storage container with a flat bitumen felt roof. There are some gaps present under the roof which do not lead anywhere and are exposed so do not provide suitable crevices for bats. Interior was not accessible.	Negligible bat roost suitability.
Building 5 – Storage shed and kennels	A single-skinned shed with some small holes present. The interior was not accessible; however, it looks to be used heavily for storage with no void space. The kennels has no potential features.	Negligible bat roost suitability
Oak Tree	This is a small oak tree on site which has no features suitable to	Negligible bat roost

	support roosting bats.	suitability

3.5 Breeding Birds

The oak tree and the chicken barn and storage shed both have the potential to support a variety of common nesting birds. The woodland to the east of the site is also a likely habitat for breeding and nesting birds.

The SxBRC returned records of three notable species of birds within 1km of the site. These records included green woodpecker *Picus viridis*, tawny owl *Strix aluco* and barn owl *Tyto alba.*

3.6 Dormice

There are no hedgerows or scrub contained within the site boundary and the species is highly unlikely to be present on site, however the adjacent woodland could support suitable habitat for this species.

While no records of this species were provided by the SxBRC, this species is known to be under-recorded and could occur in any suitable habitat in West Sussex.

3.7 Great Crested Newts and other Amphibians

There are 14 ponds within 500m of the site (see Figure 6), including a pond directly east within the woodland which had restricted access. The pond directly north of the development footprint and enclosed by the existing access to be utilised measures approximately 200m^2 (Pond 1). Access was only available for this pond, and a HSI assessment was carried out during the site walkover. The value was assessed as 'moderate' suitability for great crested newts. There is a significant coverage of algae on the surface and around 60% of the pond is shaded. The marginal vegetation comprises areas of long grass and the rubble pile next to the pond provides suitable refugia. The terrestrial value of the woodland to the east of the site, supports areas of leaf litter, patches of scrub and occasional ground cover offering suitable foraging habitat and cover for this group of species. There is a track between the pond and the woodland to the east, although this is not considered a barrier due to its narrow width and composition, meaning there is good connectivity to other ponds surrounding the site.

The SxBRC returned 21 records of great crested newt within 1km of the site.

The connectivity between nearby ponds is good and species presence has been confirmed locally, so it is considered possible that great crested newts may use this pond or the pond directly adjacent within the woodland east of the site.

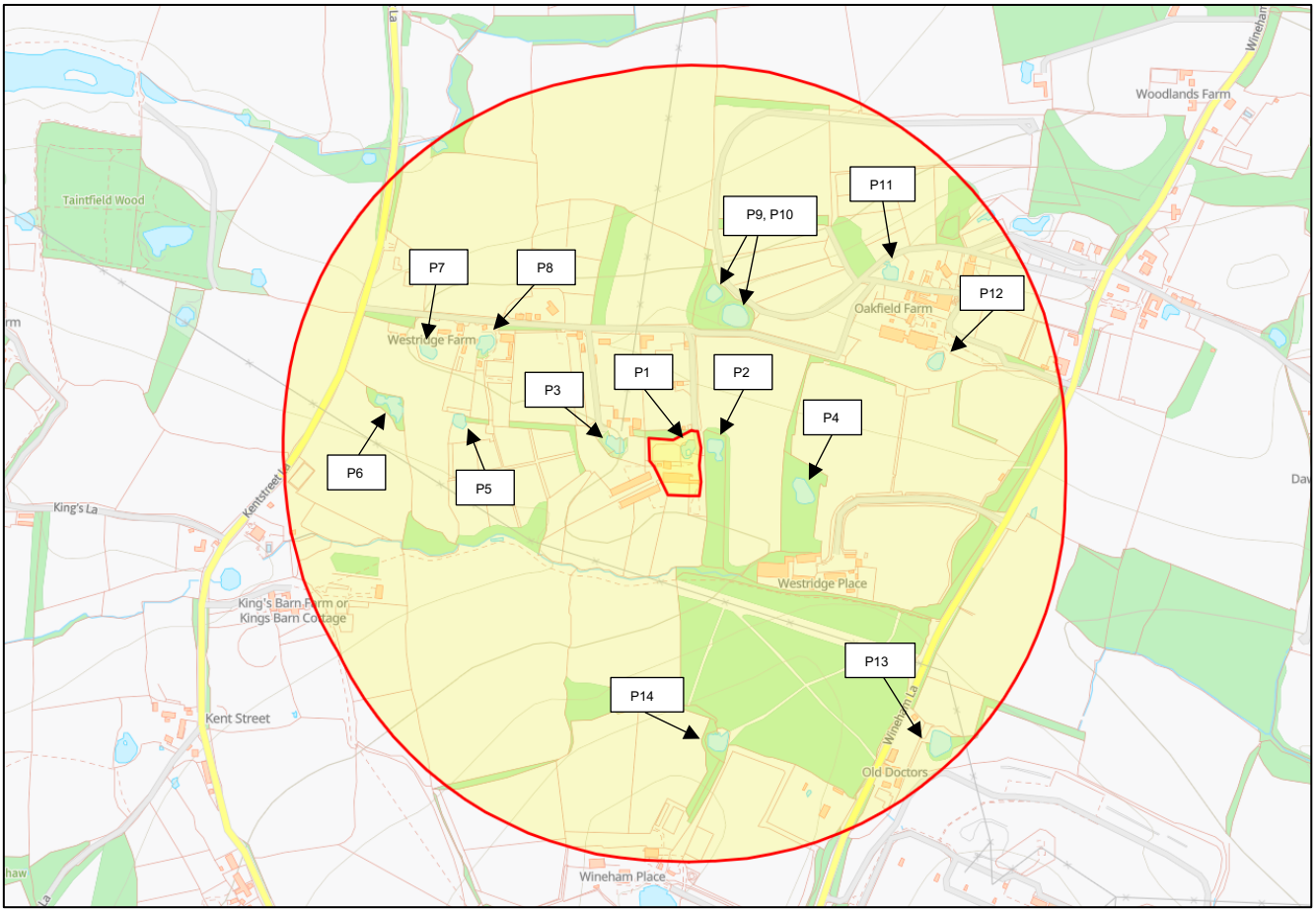

Figure 6. Ponds within 500m of the site. Image produced courtesy of Magic maps (http://www.magic.gov.uk/, contains public sector information licensed under the Open Government Licence v3.0).



Photograph 9. Off-site pond (Pond 1), with duck house in the centre.



Photograph 10. Off-site pond (Pond 1), with lots of pond weed present.

3.8 Reptiles

The site does not contain suitable habitat for reptiles and comprises almost exclusively hardstanding and a small parcel of close-mown modified grassland. The southern field comprises species-poor, modified grassland, areas of which are wet and muddy with bare ground. There are some areas of tussocky of grass present, however the

field is regularly grazed by horses, so a low sward is maintained at all times. The woodland has potential to support reptile species, however due to its low habitat suitability, they are unlikely to move onto the site.

SxBRC returned records no records of reptiles within 1km of the site.

3.9 Invasive Non-native Species

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

SxBRC returned records of Canada goose *Branta canadensis* and grey squirrel *Sciurus carolinensis* within 1km of the site.

3.10 Riparian Wildlife

There are no watercourses within 500m of the site and therefore riparian mammals are not considered within this assessment.

3.11 Other Notable Species

There is limited habitat of value for hedgehogs *Erinaceus europaeus* within the site although the woodland bordering the eastern boundary of the site has potential to support this species with good foraging and sheltering opportunities.

3.12 Survey Limitations

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

It was not possible to fully enter the interior of the chicken barn due to limited access. However, with a high-powered torch any potential features in the barn were visible to the surveyor.

4 IMPACT APPRAISAL

4.1 Designated Sites

The site is inside the zone of influence of one designated site, however due to the small scale of the development, there are no identified mechanisms of impact on designated sites as a result of the proposed development.

Therefore, in relation to designated sites, the proposed development is considered to pose a 'negligible' impact

risk.

4.2 Habitats

The habitats within the site comprise only buildings, hardstanding and species-poor modified grassland, a common habitat with low ecological value, the majority of which will be retained for residential garden and horse pasture. There is one oak tree on site which is to be retained. As such, habitats do not form a substantial constraint for the proposed development. During the construction phase, there may be impacts upon the adjacent Priority Habitat deciduous woodland. This will need to be mitigated for using best practice measures for preventing compaction of tree roots and reducing dust deposition, hydrological pollution, and noise disturbance upon this woodland.

4.3 Badgers

No signs of badger activity were identified during the assessment, and no badger setts are situated on or near to the proposed construction zone. There are, however, habitats of value for this species within the site and surrounding landscape, including the woodland along the eastern boundary and the horse pasture field which may be used for foraging. While no further surveys are required in this case, safeguarding measures are recommended during the construction period to prevent harm to badgers:

- no food or waste will be left out overnight and tools will be locked away after each day;
- any excavations more than 50cm deep will either be covered up overnight or have a means of escape provided (ladder or ramp) should a badger fall in; and
- all chemicals and hazardous building materials must be securely stored.

4.4 Bats

In accordance with the Bat Conservation Trust guidelines, the overall potential for the chicken barn and the mobile home to support bats is rated as low, and a single bat emergence survey is required for each building to determine the importance of this building to bats. All surveys must be conducted during the peak activity period between May and August.

The woodland edge habitats at the site are likely to be used by foraging and commuting bats as part of a wider resource across the landscape. As the site may be used by foraging and commuting bats, it is important that the potential for disturbance from artificial lights is considered. The proposed development is likely to require an ‘ecologically sensitive lighting scheme’ in accordance with guidance produced by the Bat Conservation Trust (summarised in Appendix 4).

4.5 Breeding and Wintering Birds

While the oak tree provides nesting opportunity for breeding birds, it is to be retained. However, the chicken barn supports old pigeon nests. Therefore, to prevent a breach of The Wildlife and Countryside Act 1981 (as amended), demolition of the building must be undertaken outside of the nesting bird season (March to August inclusive), or it will first need to be searched by a suitably qualified ecologist. If birds are confirmed to be nesting at this time, a

buffer of 5m minimum must be placed around the nest, and it cannot be disturbed until all young have fledged safely.

4.6 Dormice

While the woodland adjacent to the site has potential habitat for dormice, the demolition of the buildings and re-development of the site is highly unlikely to impact any dormice present. As such, no further surveys for dormouse are recommended.

As dormice are nocturnal, it is important that the potential for disturbance from artificial lights is considered, as for bats (see Appendix 4).

4.7 Great Crested Newts

Pond 1 has potential to support great crested newts, however, it is to be retained and lies outside of the application site. Due to the high density of ponds within the local area, and suitable terrestrial habitats, in order to ascertain whether the pond supports great crested newt, it is recommended that an eDNA survey of the pond is conducted.

If access to survey the pond for an eDNA survey cannot be attained, presence of great crested newt will be assumed, and precautionary measures will need to be taken throughout the construction phase to prevent harm to any individuals that may be present within the terrestrial habitat onsite, as well as to prevent pollution of this pond. This mitigation is as follows:

Grassland and vegetation across the site should be maintained in the same way (mown and grazed), to below a height of 5cm prior to the commencement of construction. A suitably qualified ecologist will then hand search any ruderal habitat or rubble piles on site immediately prior to the commencement of works to ensure no great crested newt are sheltering within these habitats. The following measures must also be implemented throughout the entirety of the construction phase:

- Chemicals, liquids, fuel oils or waste products, leachates or surface water used or produced by the development should be stored and disposed of correctly according to COSHH regulations.
- No chemicals will be allowed to leak on to site at any time and must be stored away from the pond.
- Any refuelling of vehicles is to be done on a plant nappy only, and spill kits must be always kept on site.
- Any trenches must be covered at night or have a rough-sawn plank placed inside to act as a ramp that will enable any wildlife to escape should they fall in.
- Security lighting should be directed away from the pond.
- All materials must be stored on raised pallets or on hardstanding to prevent being used by amphibians as resting places.
- All vehicles must stay within the construction zone and hard landscaping areas, avoiding habitats which are being retained.
- Heras fencing will be used to ensure vehicles remain within the construction zone. The Heras fencing will be fitted with kickboards at the base to prevent any small animals from pushing through into the construction zone. This fenced area will divert amphibians and any other protected species around the works area.
- Any excavations will be covered over at night or means of escape, such as a small ramp provided.

If great crested newts are found at any time during the supervised works, all activity will cease immediately, an ecologist will be contacted for advice, and the mitigation strategy will need reviewing.

4.8 Reptiles

There is limited suitability for reptiles on site, and no further surveys are required. As a precautionary measure the grassland should remain grazed/cut short as described above in section 4.7 to maintain the area as unsuitable habitat for reptiles. If the grassland is to be mowed, it is recommended to start from the north moving toward the south to encourage any reptiles present to migrate into the adjacent field. Any cuttings from the removal of the grassland should be retained and can be used to create refugia suitable for reptiles after works have been completed.

4.9 Other Notable Species

There is limited potential for hedgehogs on site, however, should fencing be prescribed, it is recommended that provisions are put in place for hedgehogs to move through the site. Any new garden fencing should contain accessible gaps (10cmx15cm) at their base to allow movement of hedgehogs between garden plots (Figure 7).



Figure 7. A hole at the base of garden fencing to allow hedgehog movement between plots.

5 OPPORTUNITIES FOR ENHANCEMENT

The proposed development represents an opportunity for habitat enhancement to benefit insects, birds, and bats. Any planting scheme should include native shrub species and flowering species known to encourage insect diversity. Such enhancement measures are in line with the recommendations of the NPPF and as such would be considered favourably when determining the planning application.

Nest boxes, designed for smaller species such as robin *Erithacus rubecula* and wren *Trogolodytes trogoldytes,* can be installed upon the new building post-construction to attract native bird species. The nest boxes should be placed between 1m and 1.5m above the ground, preferably in a shaded area. House martin *Delichon urbicum*

nest cups should be placed at the eaves of the new building where an accessible flight path is provided for the birds. if required a droppings board can be placed underneath the nest locations to ensure the area below remains unaffected.

The developer is encouraged to consider including integral bat roosting opportunities into the building fabric such as bat tiles and internal voids/access points for bats. For example, one Schwegler 1FF box could be placed on the south, west or east facing elevations and two purpose designed bat tiles onto the south-facing pitches of the roofs. Alternatively, 2FE Schwegler Wall-Mounted bat shelters could be installed upon the external faces of the buildings close to the eaves of the building on the south or eastern face (Figure 8). As best practice, the lighting scheme should be designed to minimize light spill (see Bat Conservation Trust website), around these roosting features and potential commuting routes.



Figure 8. Left: Schwegler 1FF bat box. Centre left: Vivara Pro Seville 28mm Woodstone Nest Box. Centre right: 2F Schwegler Bat Box Right: Vivara Pro Woodstone Open Nest Box.

6 CONCLUSIONS

The land at Delspride is dominated by hardstanding and modified grassland, bordered by deciduous woodland and farmland. The proposed development represents an impact that is likely to result in effects that are significant to site level only. One bat emergence survey will be carried out on the chicken barn and mobile home, between May and August to determine the importance of this building to bats. An eDNA survey of the pond directly adjacent to the sites northern boundary is recommended. The precautionary mitigation outlined in sections 4.5, 4.6, 4.7 and 4.8 and 4.9 must be followed at all times.

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

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

APPENDIX 1 – Wildlife Legislation and National Planning Policy

Introduction

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

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

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

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

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

The 'Habitats Regulations'

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

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

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

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

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

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

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

Wildlife and Countryside Act (1981) as amended.

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

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

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

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

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

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

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

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

The NERC Act (2006) created the statutory nature conservation body Natural England, and places a statutory

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

Environment Act (2021)

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

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

Protection of Badgers Act (1992)

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

Under this legislation, it is a criminal offence to:

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

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

National Planning Policy Framework

The National Planning Policy Framework (NPPF 2024)[8] sets out the Government's view on how planners should balance nature conservation with development and helps ensure that Government meets its biodiversity commitments with regard to the operation of the planning system.

Paragraph 192b, states that council plans should "*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue*

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

opportunities for securing measurable net gains for biodiversity."

The Office of the Deputy Prime Minister (ODPM) Circular 06/2005, 2005)[9]. In accordance with the NPPF, it is important that developments should contribute to and enhance the natural and local environment by:

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

UK Post-2010 Biodiversity Framework

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

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

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

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

Birds of Conservation Concern (BoCC)

In 1996, the UK's leading non-governmental bird conservation organisations listed the conservation status of all bird species in the UK against a series of criteria relating to their population size, trends and relative importance to global conservation. The lists, known as the 'Red', 'Amber' and 'Green' lists (in order of decreasing concern) are used to inform key conservation policy and decisions. The lists are reviewed every five years and are a useful reference for determining the current importance of a particular site for birds. The most recent review was undertaken in 2021 (Stanbury et al, 2021), which provides an up to date assessment of the conservation status of birds in the UK.

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APPENDIX 2 – Horsham District Planning Framework (Excluding South Downs National Park) (November 2015)

Table 2. Horsham District Planning Framework.

Policy number/title	Policy summary
Policy 24 - Strategic Policy: Environmental Protection	The high quality of the district's environment will be protected through the planning process.
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character	The council will support development that: • Maintains and enhances the Green Infrastructure Network and addresses any identified deficiencies in the District. • Maintains and enhances the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, and ensures no net loss of wider biodiversity and provides net gains in biodiversity where possible. • Conserves and where possible enhances the setting of the South Downs National Park.
Policy 26 - Strategic Policy: Countryside Protection	The rural character and underdeveloped nature of the countryside will be protected against inappropriate development. It may be considered if it protects or enhances the character area in which it is located, such as: the ecological qualities of the area, the pattern of woodlands, fields, hedgerows, trees, waterbodies and other features.
Policy 31- Green Infrastructure and Biodiversity	Development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where necessary. It should ensure the ecosystem services of that area are maintained. The council will favour development that retains and enhances significant features of nature conservation on development sites, as well as development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological networks. Where protected trees must be felled, replacement planting with a suitable species will be required. SPAs, SACs and SSSIs as well as Local Nature Reserves (LNR) and National Nature Reserves (NNR) will be given particular consideration. If the development is thought to have an indirect/direct adverse effect on biodiversity, development will be refused unless the reason for development outweighs the need to protect the site, or mitigation will be provided. Any development with the potential to impact Arun Valley SPA or the Mens SAC will be subject to a HRA 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 HRA of this plan.

Table 3. Horsham District Local Plan 2023-2040 (December 2023)

Policy number/title	Policy summary
Strategic Policy 13: The Natural Environment and Landscape character	The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats, will be protected against inappropriate development. The Council will expect development proposals to be landscape-led from the outset so that they clearly inform the design and layout. Proposals will also be required to:

	1. Protect, conserve and enhance the landscape and townscape character, taking into account features / areas identified as being of landscape importance and the individual settlement characteristics, and maintain settlement separation; 2. Maintain and enhance the Green Infrastructure Network, the Local Nature Recovery Strategy and national Nature Recovery Network and, where practicable, help to address any identified needs and deficiencies in these networks across the District; 3. Maintain and enhance the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, and secure measurable net gains in biodiversity; and 4. Incorporate SuDS into a scheme in an optimal location for their purpose whilst also securing landscape and biodiversity enhancements and delivering high-quality green spaces. Proposals will be expected to provide details to demonstrate that the 62 whole life management and maintenance of the SuDS are appropriate, deliverable and will not cause harm to the natural environment and/or landscape.
Strategic Policy 14: Countryside Protection	1. Outside built-up area boundaries and secondary settlements, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to, and justify, its countryside location, and must meet one of the following criteria: a) Support the needs of agriculture or forestry b) Enable the extraction of minerals or the disposal of waste; c) Provide for quiet informal recreational use; or d) Enable the sustainable development of rural areas. 2. In addition, all proposals must be appropriately integrated within the landscape and be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, conserves, and seeks to enhance, the key features and characteristics of the landscape character area in which it is located, including; a) The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change; b) The pattern of woodlands, fields, hedgerows, trees, waterbodies and other features; c) The landform of the area; and The protection of dark skies, in particular where it may impact on a designated International Dark Sky Reserve (IDSR), Neighbourhood Plan designations and High Weald AONB Management Plan objectives.
Strategic Policy 16: Protected Landscapes	1. Development proposals within and adjacent to the High Weald AONB must demonstrate how their development proposals conserve and enhance the natural beauty of the AONB, having appropriate regard to the setting and views into and out of the AONB, the High Weald AONB Management Plan, any updates and any other relevant documents. Proposals will be required to set out any proposed mitigation or compensation measures needed to address any harm. 66 2. Small scale development that helps to support the social and economic well-being of the AONB will be supported, provided that the scheme is compatible with the purpose of the designation. 3. Major development within the AONB will only be permitted in exceptional circumstances. Applicants will be required to demonstrate why the proposal is in the public

	interest and what alternatives to the proposal have been considered. 4. Proposals within land that contributes to the setting of the South Downs National Park should be consistent with National Park purposes and have regard to the South Downs Local Plan, the South Downs Integrated Landscape Character Assessment, the South Downs Partnership Management Plan and any other relevant document and updates. In particular, proposals should not cause harm to the special qualities (including dark skies), local distinctiveness or sense of place, by negatively affecting views into and out of the National Park. Proposals will be required to set out any proposed mitigation or compensation measures needed to address any harm.
Strategic Policy 17: Green Infrastructure and Biodiversity	Green Infrastructure 1. Development will be supported where it can demonstrate that it maintains and enhances the existing network of green infrastructure and contributes to the delivery of public open space, the Local Nature Recovery Strategy, Nature Recovery Network, natural capital, ecosystem services and / or biodiversity. Green Infrastructure should be integral to the design and layout of development, and new provision, including green linkages, should be provided taking into account Natural England's green infrastructure guidance and the council's green infrastructure strategy. Provision should seek to optimise public access to open space and nature via foot, bicycle, wheeling, and also horse as appropriate. 2. Proposals that would result in any loss, degradation or harmful impacts to green infrastructure, or core areas of the Local Nature Recovery Strategy and Nature Recovery Network will be resisted unless it can be demonstrated that new opportunities will be provided that appropriately mitigates and / or compensates for the respective harm and ensures that the ecosystem services of the area are retained and enhanced. Development proposals will be expected to remove invasive species. 3. Proposals will be expected to retain and enhance existing priority habitats and trees, and accord with the aims and objectives of the Green Infrastructure and Local Nature Recovery Strategies. Habitat enhancement including additional hedgerow and tree planting must take account of the local landscape and habitat context. It should seek to optimise biodiversity, ecological connectivity and function, and climate change resilience. a) Development likely to affect a watercourse and its associated corridor should seek to conserve and enhance its ecological, landscape and recreational value. This should include providing adequate natural buffer zones to the watercourse. Biodiversity 5. The Council will support appropriate new development which delivers at least 12% biodiversity net gain and: 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.

	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. 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 3 – Bat Scoping Photographs



Photograph 11. Northern elevation of the chicken barn (B1).



Photograph 12. Eastern elevation of the chicken barn, note the frequent holes and gaps in the timber cladding.



Photograph 13. Western elevation of the chicken barn, note the large holes on the timber cladding and gaps in the breezeblock base.



Photograph 14. Southern elevation of the chicken barn, note the open access points at the base.



Photograph 15. The main void of the chicken barn. Note the daylight gaps which are potential access points at the end gable.



Photograph 16. Lean-to void space with low ceiling and potential access points.



Photograph 17. Potential access point into the main void space from the northern elevation.



Photograph 18. Holes in the northern elevation into the wall cavity. Note the overhang which extends along the entire elevation.



Photograph 19. Fan access turrets along the roof ridge. Could have potential features but cannot be accessed.



Photograph 20. Wire beneath the fan access turrets preventing access.



Photograph 21. Mobile home (B2).



Photograph 22. Industrial building (B3).



Photograph 23. Site office (B4)



Photograph 23. Storage shed (B5).



Photograph 24. Kennels attached to storage shed (B5).

APPENDIX 4 – Reducing Impacts of Artificial Light

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

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

Avoid lighting key habitats and features altogether

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

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

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

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

[10] Bat Conservation Trust and Institute for Lighting Professionals (2018) Guidance note 8. Bats and Artificial Lighting. https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/

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

Demonstrate compliance with illuminance limits and buffers

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

Lighting Fixture Specifications

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

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

Further reading:

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

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

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

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

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

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

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

End.