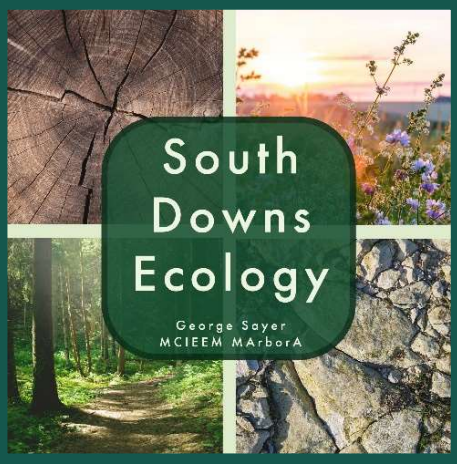
Ecological Impact Assessment

Land at Four Seasons Fuel



GS271.FourSeasonsFuel.EclA.V1.0

Ecological Impact Assessment

Land at Four Seasons Fuel, Coneyhurst Road, Billingshurst

Version 1 – 30th January 2024

Document Reference: GS271.FourSeasonsFuel.EcIA.v1

Contents

1.0 Introduction 4
2.0 Scope of Appraisal 5
3.0 Planning Policy and Legislation 6
4.0 Methodology 9
5.0 Baseline Ecological Conditions and Protected Species Assessment 11
6.0 Protected Species Assessment 16
7.0 Evaluation of Impacts and Mitigation 18
8.0 Ecological Enhancements 22
9.0 Conclusions 23
10.0 References 24
11.0 Appendix 1 – Site Photos 25
12.0 Site Habitat Plan 29
13.0 Site Aerial 30

Summary

Four Seasons Fuel Ltd has commissioned a Preliminary Ecological Appraisal, Preliminary Bat Roost Assessment and Ecological Impact Assessment of proposals for a new building at Four Seasons Fuel, Coneyhurst Road, Coneyhurst, Billingshurst (*TQ 10245 24131, hereafter referred to as 'the site'*). A Preliminary Ecological Appraisal, Preliminary Bat Roost Assessment and Phase 1 Habitat Survey of the site was carried out on the 15th January 2024.

The proposal area consists of existing developed land, of negligible ecological value, surrounded largely by abandoned land, grassland, buildings and woodland.

The proposals are for construction of a new building for processing of honey and related activities.

The proposals are not anticipated to have any significant impact upon ecology; the habitats proposed for removal are of very low distinctiveness and offer no significant potential for protected species. There is low potential for disturbance or damage to off-site habitats, most notably woodland. These impacts can be avoided through basic measures.

When mitigation and enhancements have been taken into account, the proposals are not considered to have a negative impact upon designated sites, habitats or protected species in accordance with planning policy and once enhancements are considered, would result in a minor net gain. The proposals would therefore accord with the relevant Local Plan Policies.

1.0 Introduction

1.1 Four Seasons Fuel Ltd has commissioned a Preliminary Ecological Appraisal, Preliminary Bat Roost Assessment and Ecological Impact Assessment of proposals for a new building at Four Seasons Fuel, Coneyhurst Road, Coneyhurst, Billingshurst (TQ 10245 24131, hereafter referred to as 'the site'). A Preliminary Ecological Appraisal, Preliminary Bat Roost Assessment and Phase 1 Habitat Survey of the site was carried out on the 15th January 2024.

1.2 The following ecological impact assessment report has been completed by George Sayer (*BSc (Hons)* Environmental *Sciences, PgDip Endangered Species Recovery, MArborA, MCIEEM, NE Licence Holder – Bats Level 2 and GCN - Ecologist*). This appraisal consisted of a site visit to identify existing habitats on site; the habitats have been categorised broadly following the UK Habitats Classification Guidance V2.01 (*UKHab Ltd 2023)*. In addition, an assessment of habitats and structures on the site was made to determine their potential for protected species. Following this an on-site and desktop assessment was undertaken, of the likelihood of National or European Protected Species being present on or near site, and the constraints these may pose on the development proposals.

1.3 Based on the results of the appraisal, recommendations for potential ecological enhancements have been provided.

Site Description and Surrounding Area

1.4 The site consists of an area of developed land within the wider property of Four Seasons Fuel. The land is currently used for storage with a shipping container present. The wider site consists of a commercial fuel centre, with industrial buildings, a dwelling, hardstandings, a pond and a large area to the south which has previously been cleared and is now largely abandoned. The woodland to the west also falls within the site boundary. Beyond the woodland to west and to the south, the site is bounded by paddocks. To the north the site is bounded by the Coneyhurst Road with woodland and pasture beyond. To the east is another smaller commercial centre.

1.5 Coneyhurst is a small hamlet just south-east of Billingshurst; the surroundings are predominantly pastoral land, with areas of arable and woodland also present. The built-up areas of Billingshurst begin c.1.25 km north-west.

Proposals

1.6 The proposals are for construction of a building for processing of honey and related activities.

2.0 Scope of Appraisal

1. *Identify the habitats and vegetation on site and display this in a habitat plan;*
2. *Identify habitat which may have potential for protected species;*
3. *Identify whether any signs of protected species are present on-site;*
4. *Recommend whether further surveys are required, or whether there are any relevant constraints with regards to protected species;*
5. *Identify impacts of the proposed development and set out appropriate avoidance, mitigation and compensation measures;*
6. *Provide suggestions as to how the site and proposals could be enhanced with regards to protected species and habitats.*

2.1 This appraisal and assessment is deemed to be relevant for a maximum of 18 months due to the possibility of changes in the habitats on-site. Should the site or proposals alter, the ecologist should be consulted to confirm that the appraisal is still valid.

3.0 Planning Policy and Legislation

National Planning Policy

3.1 The National Planning Policy Framework (NPPF) 2023 sets out the government planning policies for England and how they should be applied. 'Chapter 15: Conserving and Enhancing the Natural Environment' states that development should be 'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'

3.2 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 impact within the planning system.

Local Planning Policy

3.3 The Horsham District Local Plan (2020) is currently under review, with Regulation-19 approval postponed due to changes to the NPPF and Natural England concerns over the Arun Valley SPA and further delay due to changes within the Council. The Horsham District Planning Framework (2015) contains Policy 31 - Green Infrastructure and Biodiversity, which details the following:

3.4 Development will be supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure. Proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss and ensures that the ecosystem services of the area are retained.

3.5 Development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate. The Council will support new development which retains and /or enhances significant features of nature conservation on development sites. The Council will also support 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.

3.6 Where felling of protected trees is necessary, replacement planting with a suitable species will be required.

3.7 Particular consideration will be given to the hierarchy of sites and habitats in the district as follows: i. Special Protection Area (SPA) and Special Areas of Conservation (SAC) ii. Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) iii. Sites of Nature Conservation Importance (SNCIs), Local Nature Reserves (LNRs) and any areas of Ancient woodland, local geodiversity or other irreplaceable habitats not already identified in i & ii above.

3.8 Where development is anticipated to have a direct or indirect adverse impact on sites or features for biodiversity, development will be refused unless it can be demonstrated that: i. The reason for the development clearly outweighs the need to protect the value of the site; and, ii. That appropriate mitigation and compensation measures are provided.

3.9 Any development with the potential to impact Arun Valley SPA or the Mens SAC will be subject to HRA to determine need for Appropriate Assessment. In addition, development will be required to be in accordance with necessary mitigation measures for development set out in HRA of this plan.

Legislation

3.10 Legislation relating to wildlife and biodiversity of particular relevance to this EcIA includes:

- The Conservation of Habitats and Species Regulations 2017;
- The Wildlife and Countryside Act 1981 (as amended);
- The Natural Environment and Rural Communities (NERC) Act 2006;
- The Hedgerow Regulations 1997;
- The Protection of Badgers Act 1992;
- The Protection of Mammals Act 1996;
- The Environment Act 2021.

3.11 All species of bat and their roosts are protected under The Conservation of Habitats and Species Regulations 2017 and The Wildlife and Countryside Act 1981. It is an offence to intentionally kill, injure or handle a bat, to possess a bat (live or dead), disturb a roosting bat, or sell or offer a bat for sale without a licence. It is also an offence to damage, destroy or obstruct access to any place used by bats for shelter, whether they are present or not.

3.12 All UK bird species are protected against disturbance whilst occupying a nest under the Wildlife and Countryside Act 1981. Developments that could predictably disturb, kill or injure nesting birds could result in an offence. Furthermore, a number of bird species are targets of UK and Local Biodiversity Action Plans and listed as Species of Principle Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. This obligates local authorities to have regard to the purpose of conserving biodiversity with particular emphasis on targeted species.

3.13 All other mammals receive general protection against cruelty, inhumane killing or injuring under the Protection of Mammals Act 1996.

3.14 All widespread reptiles are protected against killing and injury under the Wildlife and Countryside Act 1981, with rarer reptiles receiving further protection under EU regulation. Reptiles must also be given consideration under the NERC Act 2006 as part of the planning process.

3.15 Great crested newts (GCN) are protected under The Conservation of Habitats and Species Regulations 2017. It is an offence for anyone to intentionally kill, injure or disturb a GCN or to damage, destroy or block access to areas of suitable habitat.

3.16 Badgers are protected under the Protection of Badgers Act 1992. It is an offence to harm badgers or disturb badgers and their setts.

3.17 Water voles are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 and is a priority conservation species. It is an offence to intentionally capture, kill or injure water voles, damage, destroy or block access to their places of shelter or protection (on purpose or by not taking enough care), disturb them in a place of shelter or protection (on purpose or by not taking enough care), possess, sell, control or transport live or dead water voles or parts of them (not water voles bred in captivity).

3.18 In the UK, dormice are legally protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and have significant further protection as a European Protected Species under the Conservation of Habitats and Species Regulations 2017 (as amended). Dormice are also a 'Species of Principal Importance for the conservation of biodiversity' listed under section 41 of the Natural Environment and Rural Communities Act 2006 (NERC). It is an offence for anyone to intentionally kill, injure or disturb a dormouse or to damage, destroy or block access to areas of suitable habitat.

3.19 All other mammals receive general protection against cruelty, inhumane killing or injuring under the Protection of Mammals Act 1996.

3.20 The Environment Act (2021) is making quantitative Biodiversity Net Gain (BNG) mandatory through The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024. Achieving BNG will be mandatory for major applications from 12th February 2024 and for small sites from 2nd April 2024.

4.0 Methodology

Desktop Study

4.1 A desktop study was conducted using the government 'MAGIC' Map GIS tool; a search was carried out for all international statutory designated sites (Ramsar, SAC, SPA) within 12.0 km of the site; national statutory designated sites (SSSI, NNR, LNR) within 2.0 km of the site; and non-statutory designated sites (SNCI) and priority habitats within 1.0 km of the site. These have been summarized below and their significance considered in the context of the development proposals. A search was also carried out to identify features of ecological interest in the area, such as water bodies and ancient woodland. Given the overall scale and nature of the site and the proposals, a full data search from SxBRC was not considered appropriate. This is in accordance with CIEEM current guidance for such projects (CIEEM, 2020).

Site Visit

4.2 A site visit was conducted on 15th January, during suitable weather (4 degrees, wind force 1; 1/8 cloud, dry). Habitats were recorded according to the UK-Habs Classification System as described within the UK Habitats Manual, Version 2.01 (UKHab Ltd. 2023). All habitats present on-site were recorded on a UKHab map (Figure No. 01 – Site Habitat Plan).

4.3 During the survey any constraints with regard to protected species were considered; the site was considered for their potential for protected species even when signs of these species were not noted at the time of survey.

4.4 Points of interest for protected species have been plotted into the Site Habitat Plan and within target notes.

4.5 Trees were inspected for features conducive to bat and bird roosting, including knot holes, limb failures, cavities and heavy ivy cover; any identified bird nests have been recorded.

4.6 The building was assessed internally and externally by an experienced, licenced bat surveyor (George Sayer 2018-34434-CLS) for their potential to hold roosting bats; roof spaces were assessed where possible, and access points identified. Any evidence of bats such as grease marks, bat droppings, urine splashes were noted. The bat roost assessment was conducted following the recently-published Bat Conservation Trust - Bat Surveys for Professional Ecologists: Good Practice Guidelines (2023).

4.7 Due to the site visit being carried out over one day, it is possible that some signs of protected species may not be apparent within this short timeframe. This is a constraint recognised within best practice guidelines and all reasonable effort has been made to identify evidence of protected species.

Ecological Impact Assessment

4.8 The methodology for Ecological Impact Assessment (EcIA) follows best practice guidelines set by the Chartered Institute of Ecology & Environmental Management (CIEEM): 'Guidelines for Ecological Impact Assessment' (CIEEM, 2018). This includes identifying the baseline conditions on the site and subsequently rating the potential effects of the development based on the sensitivity and value of the resource affected, combined with the magnitude, duration and scale of the impact (or change). This is initially assessed without mitigation measures, and then assessed again after allowing for the proposed mitigation measures; this provides the residual effects. The assessment is divided into construction effects and longer-term operational effects.

4.9 Each ecological feature within the site has been considered within a defined Geographic context such as:

- International and European;
- National;
- Regional;
- County;
- District;
- Local;
- Site Level;
- Negligible.

4.10 Based upon CIEEM guidance, value was determined with reference to the following factors:

- Its inclusion as a Designated Site or other protected area;
- The presence of habitat types of conservation significance, e.g. Habitats of Principal Importance (NERC 2006);
- The presence (or potential presence) of species of conservation significance e.g. Species of Principal Importance (NERC 2006);
- The presence of other protected species e.g. those protected under The Wildlife and Countryside Act 1981;
- The sites social and economic value.

4.11 Specifically in the case of bats, the impact assessment has been conducted in accordance with the recently published Bat Mitigation Guidelines (Reason and Wray 2023).

5.0 Baseline Ecological Conditions and Protected Species Assessment

Desktop Study

Designated Sites and Habitats

5.1 The following is a summary of all protected and notable wildlife sites, with sites of local and national importance recorded within 2.0km of the site and sites of international importance within 12.0 km. These are divided into statutory and non-statutory; those with full legal protection and those without, but which the Local Planning Authority should still consider when deciding on planning policy and applications. These sites are summarized in tables 1 and 2 below. A description of locally designated sites is also made below.

5.2 This information is included so that the site can be considered within the ecological context of the surrounding area, guiding decisions related to habitat change and protected species; these sites are not necessarily representative of the habitat on or surrounding the site and may not be influenced by the proposals.

5.3 The site is more than 6.5 km but within 12.0 km of the 'South Downs Bat SACs' (*namely Singleton and Cocking Tunnels SAC, Ebernoe Common SAC and The Mens SAC*) and therefore within their wider conservation area.

5.4 The MAGIC Mapping shows the site to be outside the Nutrient Impact Areas, but within the Sussex North Water Supply Zone. All new proposals that require a new water supply have to demonstrate water neutrality.

5.5 The site is within 12.0 km of the Arun Valley SPA and as such impacts upon Bewick's swan must be considered.

Table 1: Statutory Protected Designated Sites

Site Name	***Reason for designation***	***Distance from site***
Coneyhurst Cutting SSSI	*At this site the western embankment of the A272 road cutting exposes the Paludina Limestone (BGS Bed 4) of the Lower Weald Clay Formation (Wealden). The limestone (0.43m thick) shows interesting diagenetic features and contains large Paludina (Viviparus) shells preserved in 3-D. This facies is rarely exposed now. The limestone was once in great demand for interior work (especially in ecclesiastical buildings) and is of great interest to archaeologists, historians and architects.*	*280.0 m NW*
The Mens SAC	*An extensive area of mature beech Fagus sylvatica woodland rich in lichens, bryophytes, fungi and saproxylic invertebrates, and is one of the largest tracts of Atlantic acidophilous beech forests in the south-eastern part of the habitat's UK range. It is developing a near-natural high forest structure. The site is also designated for Annex II bat species of barbastelle Barbastella barbastellus.*	*6.8 km W*
Arun Valley SAC, SPA, Ramsar	*Consists of three SSSIs in an area of wet meadows on the floodplain of the River Arun between Pulborough and Amberley, subject to occasional flooding, dissected by a network of ditches, several of which support rich aquatic flora and invertebrate fauna. The site is of outstanding ornithological importance for wintering waterfowl and breeding waders. It supports seven wetland invertebrate species that are listed as threatened in Britain, one of which is endangered, and there are four nationally rare and four nationally scarce plant species.Designated an SPA for the population of Bewick's swan Cygnus columbianus bewickii. Designated an SAC for the population of Ramshorn snail Anisus vorticulus.*	*7.5 km SW*
Ebernoe Common SAC	*Ebernoe Common has an extensive block of beech Fagus sylvatica high forest and former wood-pasture over dense holly Ilex aquifolium, and has a very rich epiphytic lichen flora, including Agonimia octospora and Catillaria atropurpurea. It represents Atlantic acidophilous beech forests in the south-eastern part of the habitat's UK range. The beech woodland is associated with other woodland types, open glades and pools, which contribute to a high overall diversity. The woods are important for a number of bat species, in particular Bechstein's bat Myotis bechsteinii and barbastelle Barbastella barbastellus.*	*11.7 km W*

5.6 The following non-statutory designated sites are within 2.0 km of the proposal site:

Table 2: Non-statutory Protected Designated Sites

Site Name	***Reason for designation***	***Distance from site***
Horsham District Bat Sustenance Zone	*Areas designated within Policy 31 as significant for bat foraging and commuting*	*Site within*
Rosier Wood Billingshurst	*Ancient semi natural woodland and secondary woodland with species rich ground flora and notable floral species*	*575.0 m NW*

Habitats

Desk Study

5.7 Within 1.0km of the site there are Priority Habitats of Deciduous Woodland, Ancient Woodland, and Traditional Orchard. There are several ponds and hedges locally, also Priority Habitats. The woodland to west is all designated as Deciduous Woodland and is described further in the following site assessment.

Site Assessment

5.8 The site is given over to the habitats discussed further below.

u1b5 - Buildings

5.9 The wider site contains a Small number of buildings, mostly commercial storage and processing buildings, offices, and a bungalow. The buildings offer **negligible ecological value** in a broader sense. The potential for the buildings to support protected species is discussed in the preliminary bat roost assessment and protected species assessment below.

U1b - Developed Land; Sealed Surface

5.10 The access drive to the site area and the area itself is formed of concrete hardstanding.The habitat is of **negligible ecological value.**

U1f 10 81 82 532 (518 510) – Sparsely Vegetated Urban Land – Abandoned/Derelict Ruderal Land with Scattered Grass, and Scattered Scrub (Neglected Bare Ground)

5.11 The majority of the site appears to have originally consisted of a managed grassland paddock. Aerial imagery suggests that, around 2020 this area was cleared to bare soil. This bare soil area is used in parts for storage, but a large extent of the grassland has grown back. The species present include a combination of coarse grasses, common forbs and ruderal colonising species. Grass species identification was difficult due to the time of year but cocksfoot *Dactylis glomerata* could easily be discerned and a high proportion of perennial ryegrass *Lolium perenne* was noted. Forbs were relatively diverse and included willowherbs *Epilobium spp.;* abundant fleabane *Pulicaria dysenterica;* ground ivy *Glechoma hederacea;* creeping buttercup *Ranunculus repens;* oxeye daisy *Leucanthemum vulgare* among others. The habitat is of **site ecological value**.

5.12 Small patches of the site are developing habitat with features of the Priority Habitat 'Open Mosaic Habitats on Previously Developed Land' but the extent of these features and their recent nature means this is not classified as such. Small shallow pools contained hard rush *Juncus inflexus;* reedmace *Typha latifolia* and pendulous sedge *Carex pendula.* Small patches of scrub formed of buddleia *Buddleia davidii* and bramble *Rubus fruticosus agg.* were present.

G3c8 10 16 – Holcus-Juncus Neutral Grassland with Tall Forbs Scattered Scrub

5.13 The south and east of the site has been colonised by grassland which aerial imagery suggests has been subject to less disturbance since clearance of the site. The vegetation surrounds a shallow pool and is dominated by common grasses such as Yorkshire fog with abundant hard rush in wetter areas, as well as species such as creeping buttercup, creeping thistle, fleabane and creeping cinquefoil *Potentilla reptans.* Sparse bramble is also present. This habitat is of **site ecological value**.

H2a6 – Other native Hedgerow

5.14 The western edge of the access track, where it meets the woodland is lined with neatly trimmed native hedge, mostly of hawthorn *Crataegus monogyna*. The hedge is considered to offer **negligible ecological value.**

H3d – Bramble Scrub

5.15 The banks around the pond are formed of dense bramble, considered to offer **site ecological value.**

R1f 42 – Temporary Pond

5.16 To the south-east is a small shallow pond, which attenuates rainwater and provides emergency water to the site for fire extinguishing. The habitat is largely contiguous with the grassland with dense stands of hard rush within. The water is currently c.20cm deep and is likely to dry up in summer. It is unlikely the pond is a priority habitat and offers **site ecological value.**

W1f7 – Other Lowland Mixed Deciduous Woodland

5.17 To the west is an area of woodland in the site ownership. The woodland is formed of oak *Quercus robur* and ash *Fraxinus excelsior* with understorey of field maple *Acer campestre,* hazel *Corylus avellana,* honeysuckle *Lonicera periclymenum.* Groundcover is sparse due to the time of year but bedstraw *Galium sp.,* wood spurge *Euphorbia amygdaloides,* dog's mercury *Mercurialis perennis* and nettle *Urtica dioica* were all present A path leads through the woods with beehives to each side of the path. The woodland is a priority habitat and offers **local ecological value.**

W1g 34 – Ecologically Valuable Line of Trees

5.18 To the southern boundary of the wider site is a line of mature oak and ash trees. The treeline is a priority habitat and offers **local ecological value.**

6.0 Protected Species Assessment

Bats

Desk Study

6.1 No EPSML licences for bats are recorded within 2.0 km of site, with the nearest being just over 2.0 km south-east for common pipistrelle and brown long-eared in 2013. West Sussex contains 15 native bat species. The site is within the Horsham Bat Sustenance Zone.

Site Assessment

6.2 The buildings within the wider site have not been assessed in detail but largely appear to be modern commercial metal buildings, offering **negligible bat roost potential.** The dwelling is clad in weatherboards which might offer bat roost potential.

6.3 The immediate site area is of bare earth and concrete of **negligible value** to foraging and commuting bats. The woodland to the west is likely of **local value** to roosting, foraging and commuting bats. The treeline, grassland and sparse habitats to the south are likely of **site value.**

Birds

Desk Study

6.4 Numerous bird species are present in the local area, including a number of woodland, wetland and farmland species.

Site Assessment

6.5 The habitats on the site are of **negligible value** to birds. The off-site woodland and treeline are of **local value** whilst the grassland and sparse habitats are likely of **site value,** being more disturbed.

Reptiles

Desk Study

6.6 The surroundings are known to support reptiles including common lizard *Zootoca vivipara,* slow worm *Anguis fragilis* and grass snake *Natrix Helvetica.*

Site Assessment

6.7 The site itself is formed of bare surfaces and considered to offer **negligible value** for reptiles. The wider site is a combination of woodland, grassland, pond and sparse ruderals offering **local value.**

Amphibians

Desk Study

6.8 There are 2no. EPSML licences within 2.0 km for GCN, one 1,650.0 m west and one 1,950.0 m south. There are 3no. positive licence returns beginning 1,350.0 m west.

Site Assessment

6.9 The habitats on-site offer no suitability for amphibians being hard surfaces. There are no ponds within 100.0 m of the construction area, but several small ponds within 250.0 m. These are generally on the opposite side of the Coneyhurst Road other than one at Jefferies Farm to the west. The site pond is recently-constructed for the purpose of storing water for site use. It appears relatively suitable but is unlikely to have been colonised and is likely to dry up regularly. The wider site habitats of woodland, ruderals, grassland and the debris on site such as large logs are likely to be suitable for amphibians. The site is considered of **negligible value** to GCN, whilst the wider site offers **low potential** and likely **site value** to GCN and widespread amphibians.

Badger

Desk Study

6.10 Badger records are confidential; however, they are likely to be present in the surroundings.

Site Assessment

6.11 No evidence of badgers such as push-unders, latrines or trapped fur were noted. The wider site is suitable for low numbers of foraging and commuting badgers with the construction zone itself of **negligible value.**

Dormice

Desk Study

6.12 No records are noted in the immediate vicinity; the nearest EPSML is over 5.0 km north-east at Southwater.

Site Assessment

6.13 The woodland, hedges and treelines on the wider site are suitable to support dormice, with limited potential in the bramble which is short and disconnected. The site itself offers **negligible potential.**

Other

6.14 No potential for or evidence of any other protected species such as water vole was recorded. The site itself offers negligible potential for hedgehogs with grassland and woodland off-site offering the habitats they require. The grassland sward is too lacking in sward diversity to support significant invertebrate communities.

7.0 Evaluation of Impacts and Mitigation

Designated Sites

Potential Impacts

7.1 Given the intervening distances, and the nature of the proposals, any impacts upon local designated sites would be of minor magnitude and highly unlikely to occur. Indirect impacts from traffic pollution during construction might cause degradation of the protected sites. This increase in pollution would be minimal, with no increase in such impacts arising in the future. The site is within the wider conservation zone of the South Downs Bat SACs and as such would need to demonstrate no significant impact upon qualifying bats or their flightlines. The site is within 12.0 km of the Arun Valley SPA within which impacts upon Bewick's Swan must be considered.

Mitigation and Compensation

7.2 The proposals do not require a new water supply and as such do not have to demonstrate water neutrality. There is no external lighting proposed to the building and no vegetation removal. As such significant impacts upon bats and the bat SACs are highly unlikely. No suitable habitat for Bewick's swan exists.

Residual Impacts

7.3 The impacts will be negligible and non-significant.

Habitats

Potential Impacts

7.4 The proposals would remove existing bare ground and small areas of sparse urban habitats. In the absence of mitigation, the proposals would include dust, noise and light pollution of adjacent grassland, woodland and hedges. Given the proposals' nature and scale, impacts would be of **moderate magnitude** at no more than **site-local level.**

Mitigation and Compensation

7.5 All construction will be undertaken in accordance with best practice advice with regards to control of dust, noise and emissions. Any chemicals or fuel shall be stored appropriately and on existing surfaces. All storage will be undertaken outside tree and hedge RPAs. Trees shall be protected if necessary using barriers, but all works can and shall be completed from existing hard surfaces.

7.6 In terms of BNG, this proposal would qualify as a small site providing the woodland is not part of the development. In addition the proposals affect less than 25sqm of habitat whose value is more than zero and as such is BNG-exempt.

Residual Impacts

7.7 Once mitigation is taken into account, the impacts will be negligible and non-significant.

Bats

Potential Impacts

7.8 The buildings surrounding the site generally offer 'negligible' bat roost potential, other than the dwelling which is not affected by proposals. The construction site offers negligible potential for bats roosting, foraging or commuting. Construction noise, dust, lighting and vibration may temporarily make the adjacent habitats slightly less suitable for foraging bats, and bats commuting along the hedge and woodland habitats. Given the overall size and nature of the site, the potential impacts to foraging bats is low.

Mitigation and Compensation

7.9 Any works shall be undertaken with due consideration and measures to minimise dust and noise. No works shall take place externally between 30 minutes before sunset until 30 minutes after sunrise. No external works lighting shall be used. All new lighting shall accord with the principles of the BCT/ILP Guidance Note 08/23. It is understood that no external lighting is proposed.

Residual Impacts

7.10 The overall impact of the scheme will be negligible.

Nesting Birds

Potential Impacts

7.11 No evidence of active nesting birds was noted within or adjacent to the site.

Mitigation and Compensation

7.12 The works shall be undertaken with due regard to the hedges and trees, which must be protected using tree protection measures.

Residual Impacts

7.13 The overall impact of the scheme will be negligible.

Reptiles

Potential Impacts

7.14 No potential impacts within the site area but inappropriate clearance and storage of building materials might harm individual reptiles.

Mitigation and Compensation

7.15 Any clearance of surrounding habitats or debris shall be undertaken with due care, making sure to strim any taller habitat before any such land is used for storage or such like. Works to the site shall be aware of the possibility of reptiles, providing ramps or covers to any excavations or pipework, and keeping materials storage away from the boundaries. The site and immediate surroundings shall be kept well maintained to ensure reptiles would not be sheltering within the construction zone.

Residual Impacts

7.16 The overall impact of the scheme will be negligible.

Amphibians

Potential Impacts

7.17 No potential impacts within the site area but inappropriate clearance and storage of building materials might harm individual amphibians such as toads.

Mitigation and Compensation

7.18 Any clearance of surrounding habitats or debris shall be undertaken with due care, making sure to strim any taller habitat before any such land is used for storage or such like. Works to the site shall be aware of the possibility of amphibians, providing ramps or covers to any excavations or pipework, and keeping materials storage away from the boundaries. The site and immediate surroundings shall be kept well maintained to ensure amphibians would not be sheltering within the construction zone.

Residual Impacts

7.19 The overall impact of the scheme will be negligible.

Dormice

Potential Impacts

7.20 No impact.

Mitigation and Compensation

7.21 Non required. Hedges and woodland shall be retained and protected as described above.

Residual Impacts

7.22 The overall impact of the scheme will be negligible.

Badgers

Potential Impacts

7.23 No impact.

Mitigation and Compensation

7.24 Non required.

Residual Impacts

7.25 The overall impact of the scheme will be negligible.

Hedgehogs

Potential Impacts

7.26 Individual hedgehogs and other small mammals may use the site and be injured during works.

Mitigation and Compensation

7.27 Works to the site shall be aware of the possibility of small mammals, providing ramps or covers to any excavations or pipework, to accord with the Protection of Mammals Act 1996. The surrounding habitats shall be kept well cut to ensure hedgehogs would not be sheltering within the construction zone. Any piles of timber, debris etc. shall be checked before removal to ensure no hedgehogs are sheltering within.

Residual Impacts

7.28 The overall impact of the scheme will be negligible.

8.0 Ecological Enhancements

8.1 Development proposals will be expected to demonstrate an overall positive impact on the natural environment as set out in Local Plan Policies. The following ecological enhancements have been proposed as suited to the location and the proposals and would result in a Biodiversity Net Gain, in accordance with Local and National Policy.

- Addition of at least 1no. bird box to the woodland – this could be a standard bird box, an open bird box in the hedge or a larger predator bird box in a mature tree;
- Addition of at least 1no. bat box to the woodland or treeline, in a sunny south-facing position;
- Addition of a hedgehog house to the woodland edge;
- Reseeding of any bare areas of site, which are unlikely to be used in the near future, with a seed mix suited to pollinators;
- Addition of log piles to the corners of the site, particularly around the pond for insects, reptiles and hedgehogs.

9.0 Conclusions

9.1 Overall, the proposals are considered to represent a 'negligible' impact upon ecology and no further surveys are recommended. The proposal area consists of bare hard surfaced land of negligible value, surrounded by a mixture of habitats of low to high ecological value.

9.2 The proposals are not anticipated to have any significant impact upon ecology; the proposals stand a 'negligible' chance of disturbing bats or their roosts provided basic avoidance measures are incorporated into construction. No further surveys are recommended at the site for these proposals. The proposals present a very low risk of harm to nesting birds, hedgehogs, reptiles and widespread amphibians, all of which can easily be avoided using basic construction protection measures.

9.3 No significant effects are anticipated upon any designated sites or priority habitats, including the Arun Valley and the South Downs Bat SACs.

9.4 When mitigation and enhancements have been taken into account, the proposals are not considered to have a negative impact upon habitats or protected species in accordance with planning policy and once enhancements are considered, would result in a net gain.

9.5 The proposals include for new proportionate ecological enhancements. The proposals would therefore accord with the relevant Local Plan Policies.

10.0 References

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11.0 Appendix 1 – Site Photos

Photo 1 – View of the site construction area.



Photo 2 – View of the approach from the site access.



Photo 3 – Main body of the wider site with modern commercial buildings.



Photo 4 – Sparse habitats to the south of the site.



Photo 5 – Small patches of habitat developing towards open mosaic habitat.



Photo 6 – Grassland surrounding the pond to the east.



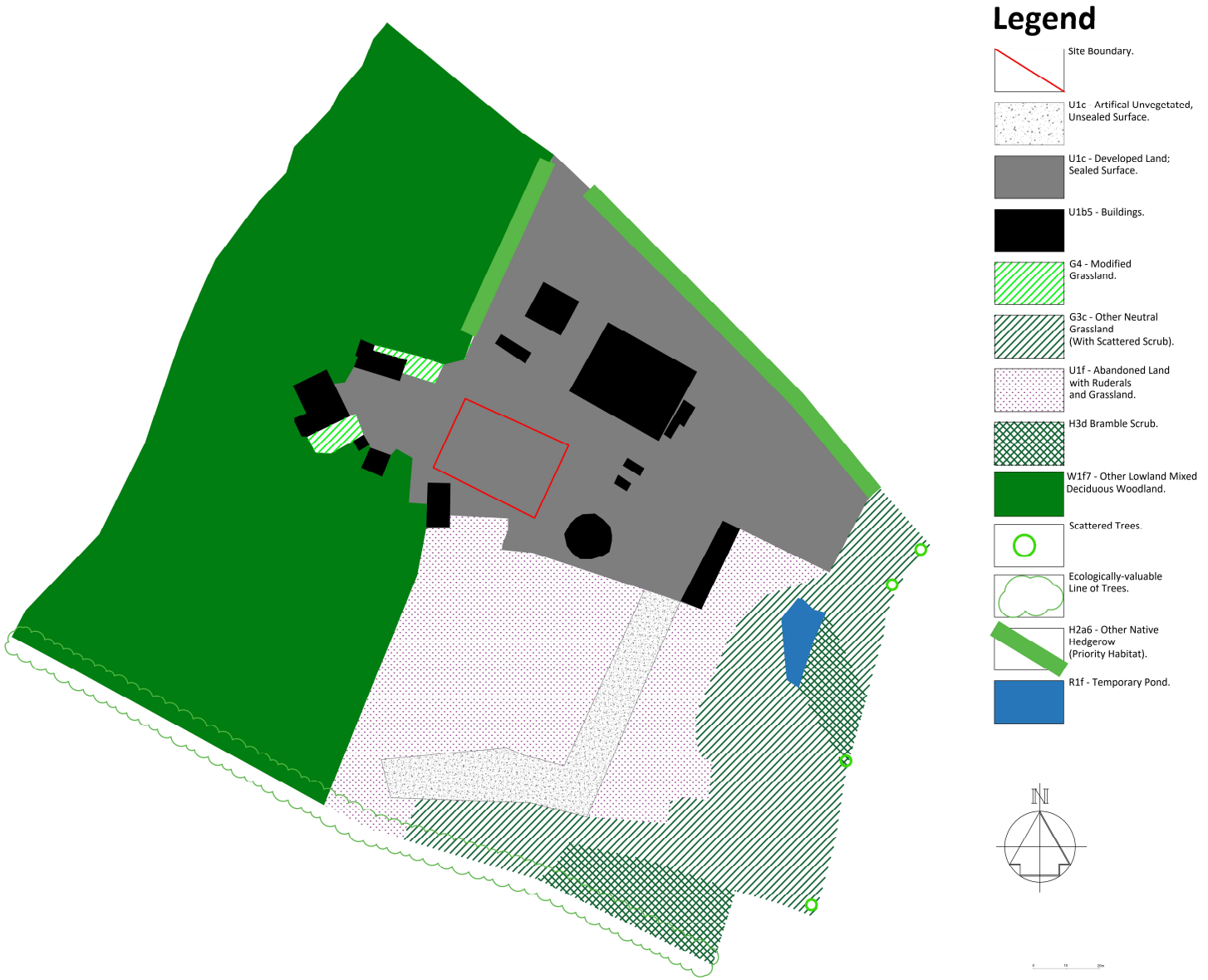
Photo 7 – Pond to the east.



Photo 8 – View of the woodland to west.



12.0 Site Habitat Plan



13.0 Site Aerial

