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Biodiversity Enhancement Strategy

The Mill, Coolham, Sussex

Site	*The Mill, Coolham, Sussex*
Project number	*105221*
Client name / Address	*The Waterstream Group, 1-7 Station Road, Crawley, West Sussex*

Version number	**Date of issue**	**Revisions**
1.0	*9 February 2024*	*Original*
2.0	*23 April 2024*	*Changes to locations of bird and bat boxes*

Author(s)	[redacted]	[redacted]
Reviewed by	[redacted]	[redacted]
Contact	*MKA Ecology Limited, 01763 262211, info@mkaecology.co.uk*	

Declaration of compliance

This Biodiversity Management Plan has been undertaken in accordance with British Standard 42020:2013 “Biodiversity, Code of practice for planning and development”.

The information which we have provided is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management’s (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

We are a Chartered Institute of Ecology and Environmental Management (CIEEM) Registered Practice. All of our ecologists are members of CIEEM and between them carry licences for the majority of protected species.

CONTENTS

1. INTRODUCTION 4

1.1. Aims and objectives 4
1.2. Management responsibility 4
1.3. Timescales for implementation 5
1.4. Existing site ecology 5
1.5. Proposed site ecology 5

2. ESTABLISHING NEW ECOLOGICAL FEATURES 7

2.1. Hedgerow 7
2.2. Shrub planting 8
2.3. Tree planting 10
2.4. Deadwood features 11
2.5. Bird nest boxes 12
2.6. Bat boxes 13
2.7. Lighting 14
2.8. Ecological establishment and management timings 16

3. POST-DEVELOPMENT MANAGEMENT 17

3.1. General vegetation 17
3.2. Hedgerows 17
3.3. Shrubs and perennial planting 18
3.4. Trees 18
3.5. Deadwood features 18
3.6. Bird boxes 18
3.7. Bat boxes 19
3.8. Post development management timings 20

4. REFERENCES 21

5. APPENDIX 22

1. INTRODUCTION

1.1. Aims and objectives

This management plan will provide recommendations to enable the maintenance and enhancement of key ecological features at The Mill, Coolham, Sussex (referred to in this report as The Mill, Coolham). The aim is to maintain or enhance habitats and features of benefit to protected species known to be present within the local area, as well as providing general enhancements for the wider benefit of local flora and fauna.

Outline planning permission has been granted for a development at The Mill, Coolham (ref: DC/21/1600). This Biodiversity Enhancement Strategy is required in order to discharge a conditional requirement, issued by Horsham District Council (Horsham District Council, 2023). Condition 5 of the Decision Notice states:

Pre-Commencement (Slab Level) Condition: *No development above ground floor slab level shall take place until a Biodiversity Enhancement Strategy for Protected and Priority species shall be submitted to and approved in writing by the local planning authority. The content of the Biodiversity Enhancement Strategy shall include the following:*

a) Purpose and conservation objectives for the proposed enhancement measures;

b) Detailed designs to achieve stated objectives;

c) Locations of proposed enhancement measures by appropriate maps and plans;

d) Persons responsible for implementing the enhancement measures;

e) Details of initial aftercare and long-term maintenance (where relevant). The works shall be implemented in accordance with the approved details prior to occupation and shall be retained in that manner thereafter.

Reason*: To enhance protected and Priority species & habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority Habitats & Species).*

This Biodiversity Enhancement Strategy will cover the management requirements for this site over a five-year period after project completion.

1.2. Management responsibility

During construction, the project manager and principal contractor are responsible for ensuring full implementation of mitigation measures relating to existing ecological features, and correct installation

of ecological enhancement features on the new buildings. In both cases they will be required to confirm that the required actions onsite were carried out.

Post-construction management of ecological features at The Mill, Coolham will be the responsibility of the owner or contracted landscaping team following completion of the project. A copy of this Biodiversity Enhancement Strategy will be included as part of the building information pack, to inform the owner of the ecological features present and their management requirements.

1.3. Timescales for implementation

The exact date of construction completion is not known at this stage. Therefore, the schedules provided in this document are not year-specific, rather they are general timetables detailing the recommended or required period for works to be conducted.

1.4. Existing site ecology

In December 2021 MKA Ecology Ltd undertook a Preliminary Ecological Appraisal and Preliminary Roost Assessment at the Mill, Coolham (MKA Ecology Ltd, 2021). The Site was found to consist primarily of hardstanding and built storage structures, with occasional trees and small patches of ephemeral vegetation and scrub. There is a small area of modified grassland to the east which is bordered by a hedgerow. Several instances of butterfly bush *Buddleja davidii*, an undesirable non-native species, were also identified. The area within the red line boundary is approximately 0.6ha.

The ecological survey found that there was a low potential for roosting bats in one of the buildings, however, because this building will not be impacted by the proposed scheme no further surveys were recommended. Buildings impacted by the proposed scheme were all assessed to hold negligible potential for bats. The hedgerows and scrub were also identified as suitable habitat for nesting birds, and there was found to be a low potential for hedgehog *Erinaceus europaeus* and great crested newt *Triturus cristatus* to be present within some of the habitats.

1.5. Proposed site ecology

The proposed development will involve the demolition of four existing commercial structures and the erection of two new Class E light industrial and retail buildings, with associated car parking, outdoor storage, and landscaping. Some of the existing habitats, including trees, will be retained. Soft landscaping will include a new hedgerow comprising native species along the south and eastern boundaries, several larger trees, and ornamental shrub planting throughout. The proposed development plan is shown in Figure 1, Appendix.

Additionally, as recommended in the Preliminary Ecological Appraisal and set out in the Design and Access Statement (MKA Ecology Ltd, 2021; Foster Lomas, 2021), several biodiversity enhancement features will be implemented throughout the scheme, including bird boxes, deadwood features, and bat boxes. It is anticipated that these biodiversity enhancements will help to secure biodiversity gains and ultimately a sustainable development.

These biodiversity enhancements are in line with the National Planning Policy Framework which details that ecological enhancements should aim to deliver biodiversity gains for the proposed development site. Additionally, the enhancements are in line with Policy 31 of the Horsham District Council Local Planning Framework (Horsham District Council, 2015), which requires that new developments make a positive contribution to biodiversity through the creation of green space.

2. ESTABLISHING NEW ECOLOGICAL FEATURES

Following the issue of the revised National Planning Policy Framework (NPPF) updated on 19 December 2023, all planning decisions should aim to maintain and enhance, restore or add to biodiversity and geological conservation interests, and provide net gains in biodiversity where possible.

Ecological enhancements at the site include incorporating native planting into the landscape design, and the provision of ecological features including bird boxes, bat boxes, and deadwood features.

The Appendix (Section 5) includes both the landscaping plan and an annotated site plan showing the locations of the proposed habitats and biodiversity enhancement features.

2.1. Hedgerow

Target structure

A hedgerow comprising woody native species will be established along the southern and eastern boundaries of the Site. A species schedule has been provided by the landscape architect, and is reproduced in Table 1 (Andy Stedman, 2024). These species include those that are known to be of benefit to wildlife through provisioning nectar and berries over the year. Hedgerows are a Habitat of Principal Importance under Section 41 of the NERC Act (2006).

Table 1: Species for hedgerow establishment

Common Name	Systematic name
Hawthorn	*Crataegus monogyna*
Beech	*Fagus sylvatica*
Common holly	*Ilex aquifolium*
European hornbeam	*Carpinus betulus*

Planting

If the ground has grass or weeds present, clear the site either by hand in late summer/autumn. Allow plenty of space for the final size of the hedge. When you are ready to plant, dig a trench approximately 60cm wide and one spade's depth. Fork over the base of the trench to break up any compacted soil and you can add some garden compost, well-rotted manure or slow-release fertiliser such as sterilised bonemeal. Fork this in to the soil.

Planting will take place between December and March inclusive. Planting will consist of a staggered double row of plants, spanning two rows 45cm apart, with a total of five plants per linear metre. Species

will be randomised along the lines. Plants will be fully dormant, in good condition and free of pests and diseases.

Place plants in the prepared trench and back-fill with the soil and any incorporated fertiliser ensuring that the roots are completely covered. Firm the soil and then water. All shrubs will be protected with a 75mm tall x 50mm wide clear spiral shelter with no holes supported by a bamboo cane.

Additionally, piles of deadwood can be placed underneath the hedgerows in order to provide habitats for invertebrates, as discussed in Section 2.4 below.

2.2. Shrub planting

Target structure

The scheme will include several areas of ornamental shrub and perennial planting, which will comprise a mixture of native cultivars and non-native species. There will be two distinct species schedules for different sections of the Site, both of which are outlined in the tables below (Andy Stedman, 2024). Species selected will provide a range of pollen and nectar sources, as well as other habitat niches, for invertebrates throughout the year.

Table 2: Shrub and perennial planting Schedule 1

Common Name	Systematic name
Garden lady's-mantle	*Alchemilla mollis*
Japanese anemone 'Honorine Jobert'	*Anemone hybrida* 'Honorine Jobert'
Red-barked dogwood 'Elegantissima'	*Cornus alba* 'Elegantissima'
Purple coneflower	*Echinacea purpurea*
White gaura	*Gaura lindheimeri*
Japanese forest grass	*Hakonechloa macra*
English lavender 'Hidcote'	*Lavandula angustifolia* 'Hidcote'
Chinese Silver Grass	*Miscanthus sinensis* 'Yakushima Dwarf'
Olive	*Olea europaea*
Chinese fountain grass 'Hameln'	*Pennisetum alopecuroides* 'Hameln'
Mountain pine	*Pinus mugo*
Japanese lace fern	*Polystichum polyblepharum*
Sweet box	*Sarcococca hookerana*
Purpletop vervain	*Verbena bonariensis*

Table 3: Shrub and perennial planting Schedule 2

Common Name	Systematic name
Yarrow 'White Beauty'	*Achillea millefolium* 'White beauty'
Pheasant's tail grass	*Anemanthele lessoniana*
Feather reed grass 'Karl Foerster'	*Calamagrostis x acutiflora* 'Karl Foerster'
Male fern	*Dryopteris felix-mas*
Rakai hebe	*Hebe rakaiensis*
Hydrangea 'Annabelle'	*Hydrangea* 'Annabelle'
Red-hot poker 'Little Maid'	*Kniphofia* 'Little Maid'
Japanese spurge	*Pachysandra terminalis*
Rodgers' bronze-leaf	*Rodgersia podophylla*
Coneflower 'Goldsturm'	*Rudbeckia fulgida* 'Goldsturm'
Balkan clary 'Caradonna'	*Salvia nemorosa* 'Caradonna'
Burnet 'Tanna'	*Sanguisorba officinalis* 'Tanna'
Sweet box	*Sarcococca confusa*
Autumn moor-grass	*Sesleria autumnalis*
Blue moor grass	*Sesleria nitidita*
Lamb's ear	*Stachys byzantina*
Purpletop vervain	*Verbena bonariensis*

Preparation

If the ground has grass or weeds present, clear the area by hand. Bare-root shrubs and shrubs in pots should be well-watered prior to planting. When you are ready to plant, dig a hole a slightly deeper than pot depth and three times as wide. Hard, compacted soil should be forked to loosen it to help the roots penetrate. Mix in organic matter (garden compost or bags of soil conditioner) to help the soil hold water and drain better.

Planting

Tip the plant out of its pot. If the roots are very congested, tease out to help the plant grow into the soil more quickly. Place the shrub into the prepared hole at the same ground-level as it was in its pot, avoiding burying the stems. Refill the hole and heel in the soil around the shrub without pressing on the root ball. Water well and add a 50mm-80mm layer of mulch, leaving a 100mm mulch-free collar around base of stems. Most plants growing in these habitat types are adapted to low-nutrient conditions, so no

fertiliser is required. Fertiliser should not be applied as this may encourage the growth of undesirable vigorous weeds that thrive in high nutrient conditions, such as common nettle *Urtica dioica*.

2.3. Tree planting

Target structure

A mixture of native and non-native trees will be planted throughout the scheme. A planting schedule is provided in the table below (Andy Stedman, 2024). Many of these trees are fruit bearing, and will provide nesting and foraging opportunities for birds throughout the year.

Table 4: Tree planting schedule

Common Name	Systematic name
Hornbeam 'Frans Fontaine'	*Carpinus betulus* 'Frans fontaine'
Snowy mespilus	*Amelanchier lamarckii*
Italian cypress 'Totem Pole'	*Cupressus sempervirens*
European hornbeam	*Carpinus betulus*
Holm oak	*Quercus ilex*
West Himalayan birch	*Betula utilis* subsp. *jacquemontii*

Preparation

It is recommended that trees are planted when they are dormant, as this means they are less likely to become damaged; the recommended season for tree planting is November to March. Trees should be stored upright prior to planting and sprayed lightly with water if they are drying out.

Before planting the area should be free of weeds. Trees should be planted at least 2m apart.

Planting

Pit planting is the recommended method for planting trees as it ensures the trees have the best contact with the soil. Size of pits should be 600x600x600mm minimum for tree up to 180mm girth and 1000x1000x1000mm minimum for trees above 180mm girth. Using a spade, take up some turf and chop it into smaller pieces; dig a hole that is slightly wider and deeper than the roots of the tree and place the cut-up turf at the bottom of the hole to provide extra nutrients. Add a 100mm deep shingle drainage layer. Put the tree into the hole and check the depth, the collar of the tree (where it originally started growing above the ground) should be level with the top of the soil. If the tree is planted too shallow the roots above ground will die and too deep and the stem may rot.

Hold the tree upright and push down the soil lightly around the roots, the soil should not be compacted as this can stop water and air circulation. Add appropriate planting compost into the hole. A stake should

be pushed into the ground next to the tree and a tree guard added if there is risk of browsing damage from deer or rabbits.

2.4. Deadwood features

Target Structure

Deadwood provides habitat for a large number of invertebrate species and also terrestrial habitat for reptiles and amphibians. Any wood and branches collected from the removal of existing vegetation can be collected into brash or log piles to build discrete log piles under the hedgerows and within the shrubbery. Small branches can be stacked straight onto the ground and larger logs can be incorporated as individual deadwood features within the landscaping.

Low maintenance invertebrate-friendly habitats such as log piles will help improve the biodiversity of the area. Invertebrate habitats can be made to look interesting and provide variety and interest compared to traditional landscape planting.

Log pile creation guidance can be found in the below table.

Table 5: Log pile creation

Example	Description	Picture
Stag beetle loggery	https://ptes.org/9-top-ways-to-help-stag-beetles-in-your-garden/ Large volume deadwood dug into the soil (a minimum of 500mm depth) to provide food for the larvae of deadwood specialists such as stag beetles.	 (image credit – https://stagbeetles.ptes.org/how-to-build-a-log-pile/)
Artificial rot hole	Once felled, an artificial cavity can be carved easily with a chainsaw or drill to create a rot hole. The ensuing pool and rotting wood provide habitat for a number of specialist invertebrates.	 (image credit - https://practicalselfreliance.com/natural-tree-stump-removal/)

Preparation

Untreated wood should be sourced from the Site or nearby and stacked into a pile; logs of different sizes can be used to add structural diversity.

Installation

Log piles should be established under the native hedgerow to increase its value as a corridor of native habitat through the Site. A map of the proposed locations of the log piles, taken from the Design and Access Statement, are provided in Figure 2 in the Appendix.

2.5. Bird nest boxes

Target structure

Two bird boxes will be installed at the site post-development. As per Recommendation 9 of the Preliminary Ecological Appraisal, this should include boxes for common garden species (Schwegler Bird Home 1MR or similar) (MKA Ecology Ltd, 2021). Whilst it was also recommended that two boxes for house sparrow should be included, following discussion with the design team it has been concluded that there are no suitable locations for house sparrow boxes and they have therefore been omitted. This is not considered to be a major limitation of the management plan as it is not likely that these boxes would have been used by this species in any case.

Specifications for the recommended bird boxes are shown in Table 6 below.

Table 6: Bird boxes

Generalist		
Example	**Description**	**Picture**
Schwegler Bird Home 1MR	www.schwegler-nature.com Suitable for various garden and woodland birds. Can be attached directly to external walls.	

Installation

Bird boxes will be installed onto an existing tree and onto the exterior of the timber archway, as shown in Figure 2 in the Appendix. Following discussion with the design team, it has been concluded that it won't be possible to install integrated boxes due to the materials used for construction. It has also been confirmed that the tree will be of a sufficient size and height to support a bird box, and that the timber archway will be of a suitable height.

It is also appreciated that the proposed locations for these bird boxes are not optimal as there may be disturbance caused by people walking under the archway; however, there is limited space within the scheme and the locations shown are the most suitable that could be found. Nonetheless, if it is found that more suitable locations are present once the development has been completed, the bird boxes should be re-sited.

In general, bird boxes should be mounted:

- Two to five metres up;
- Out of direct sunlight;
- Out of prevailing winds;
- Facing between north and east (if in an exposed location);
- Out of reach of predators such as domestic cats; and
- In locations with suitable foraging habitat for the target species close by.

Approximate locations of where the bird boxes will be installed are shown in Figure 2, Appendix.

2.6. Bat boxes

Target structure

As per Recommendation 10 of the Preliminary Ecological Appraisal (MKA Ecology Ltd, 2021), two bat boxes will be provided at the Site. The recommended box is the Low Profile WoodStone Bat Box, which will be installed onto the external wall of the building, as shown in Figure 2 in the Appendix. Following discussion with the design team, it has been concluded that it won't be possible to install integrated boxes due to the materials used for construction. Specifications of this box are provided in Table 7 below.

Table 7: Bat box

Example	Description	Picture
Low Profile WoodStone Bat Box	https://www.nhbs.com/ Dimensions: 440mm x 290mm x 90mm (H x W x D) Weight: 4.7kg Installation: Hanging This box is suitable for crevice dwellers, such as Nathusius´ pipistrelle, Daubenton's bat and common pipistrelle.	

Installation

Bat boxes should be installed on the eastern aspect of the building. The proposed locations of the bat boxes are described in Figure 2 in the Appendix.

Principles for siting locations of bat boxes are as follows:

- Locate close to feeding and commuting areas; at this site this will be the trees and planting to the east, which will provide insect prey.
- Install at least 2m high.
- There should be at least 2m of free flying space below the box entrance for bats to fly up and into the box.
- Bat box entrances and surrounding areas should not be lit.

2.7. Lighting

Lighting is known to adversely affect bat foraging behaviour, along with negatively affecting other wildlife including birds.

The lighting design at The Mill, Coolham should be developed in line with the following principles:

- Minimise the lighting levels across the site;
- Lighting should be designed with luminaire specifications as outlined in ILP 2023;
- Minimise upward spill of light with the use of directional luminaires, shields, baffles and louvers to direct light where it is needed and prevent light being directed over and around the feature concerned (in this case the vegetation and bat boxes);

- Avoid light spill onto surrounding habitats important to bats, notably the hedgerow and trees to the south and east; and
- Consider the timings of lighting required, where possible avoiding lighting in the hours immediately after dusk and before dawn when bats are most active.

2.8. Ecological establishment and management timings

An indication of the timings for the various biodiversity management actions to be undertaken during the development phase is shown in Table 8. These should be used to inform the scheduling of development works at the site.

Table 8: Ecological enhancement features schedule

Activity	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Hedgerow planting												
Shrub planting												
Tree planting												
Creation of deadwood features												
Mounting of bat/bird boxes												

Key

Appropriate timing of works	

3. POST-DEVELOPMENT MANAGEMENT

3.1. General vegetation

Good horticultural practices will be employed to ensure no, or minimal, use of pesticides and herbicides within communal areas. Where required, 'weeds' (e.g. thistles, nettles, docks, etc.) will be removed by hand.

Under the Wildlife and Countryside Act (1981) as amended it is an offence to deliberately, or recklessly kill or injure any wild bird or damage or destroy any active nest or eggs of a wild bird and therefore control and maintenance of the trees or hedgerow habitats should be undertaken outside of the bird breeding season (which runs from March to August inclusive). If works are unavoidable within the bird breeding season, a suitably experienced ornithologist will be required to confirm that no resident birds will be affected by the proposed work before works commence.

Cuttings from tree or hedgerow management can be used to create discreet brash and log piles which are of benefit to a wide variety of wildlife including invertebrates, birds, and hedgehogs, and could complement or add to existing deadwood features created at the site. The creation of deadwood features is discussed further in Section 2.4.

3.2. Hedgerows

The hedgerow will be regularly watered up to three years after its establishment. The area around the base of the hedge (at least 1m width) will be kept clear of weeds so that the plants can draw sufficient nutrients and water from the soil. This is best done by hand weeding or applying a mulch. Hand weeding or mulching will be conducted two to three times per year.

The newly planted hedgerow must not be cut within the first three years, until it has established. After this, one side will be trimmed every year. By cutting only one side each year, this will ensure the hedgerow continues to provide berries for bird species. Within a period of five years after the completion of the development landscaped areas, all dead, dying, diseased, and vandalised plant stock should be replaced in the next planting season with others of similar size and the same species.

Under the Wildlife and Countryside Act 1981 it is an offence to disturb breeding birds and therefore control and maintenance of hedgerows should be undertaken outside of the bird breeding season (which runs from March to August inclusive). If works are unavoidable within the bird breeding season, a suitably experienced ornithologist will be required to confirm that no resident birds will be affected by the proposed work.

3.3. Shrubs and perennial planting

Shrubs may require some annual pruning to contain growth and prevent any single species becoming too dominant. This should be carried out during the winter months. Plants may also require some watering during extended dry periods in the summer.

3.4. Trees

In the first two to three years, it is important to keep a 1m diameter around each tree free of weeds, this will reduce competition for water and nutrients. Weeds can be supressed with mulch such as bark chips laid around the tree to a depth of 100mm.

Strong winds can blow newly planted trees over; make sure the stakes and tree guards are inspected often and remain upright and firmly in the soil. Any grass or weeds that are growing inside the guard should be removed as soon as possible.

Staked trees should be checked every six months and the stake can be removed once the tree is stable in the ground. Any tree guards that were placed can be removed as soon as they start to split. Pruning is not essential but can be done to encourage the tree to grow upwards rather than outwards; any branches cut should be cut square to the branch and the bark of the trunk should be protected from damage. Pruning is best done in winter when the trees are dormant.

The trees should be regularly checked for damage and/or disease and any dead or dying trees should be replaced with others of a similar size and the same species within a period of five years after the completion of the development.

3.5. Deadwood features

Log piles require very limited management and are best left undisturbed. Cuttings from tree or hedgerow management can be added to the existing log piles to ensure a continuous supply of wood in various states of decay.

The Site was found to hold low potential to support notable amphibian species such as great crested newt during the Preliminary Ecological Appraisal (MKA Ecology Ltd, 2021). If great crested newts are found during log pile maintenance, works should stop immediately and an ecologist should be contacted.

3.6. Bird boxes

Nest boxes should ideally be cleaned at the end of each bird breeding season. However, this is not essential. All nesting material and other debris should be removed from the box. Boxes should then be scrubbed clean with boiling water to kill any parasites (avoid using any chemicals). Once the box is clean, it should be left to dry out thoroughly. Under the Wildlife and Countryside Act 1981 it is an offence to disturb breeding birds and therefore annual cleaning is best undertaken from October to January when there is no risk of disturbing breeding birds. Ideally, bird nest boxes should be cleaned in October to prevent the build-up of nest parasites in the boxes whilst avoiding the risk of disturbing birds that may use the boxes as a roost site during the cold winter months.

3.7. Bat boxes

A special licence is required in the UK to disturb and handle bats and therefore the cleaning of bat boxes should be managed carefully.

Boxes are generally unlikely to be used by hibernating bats and winter (i.e. November to February inclusive) is therefore generally the best time of year to undertake maintenance. Any droppings and bird nesting material should be removed.

If bats are discovered during the maintenance process staff should replace the box as found and withdraw immediately. An annual check should be made each winter to ensure that all boxes are still in position and secure.

MKA Ecology Ltd can monitor the use of bat boxes should you wish to maintain a record, or your local bat group may be able to assist with the work.

3.8. Post development management timings

An indication of the timings for the ecological management actions to be undertaken at the site post-development is shown in Table 9. These should be used to inform management practices at the site.

Table 9: Post development management timings

Activity	Frequency	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Hedgerow management	Annual												
Shrub pruning	As needed												
Tree management	As needed												
Maintenance of deadwood features	As needed												
Maintenance of bird boxes	Annual												
Maintenance of bat boxes	Annual												

Key

Appropriate timing of works	

4. REFERENCES

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5. APPENDIX

Figure 1: Post-development plan for The Mill, Coolham (Andy Stedman, 2024)

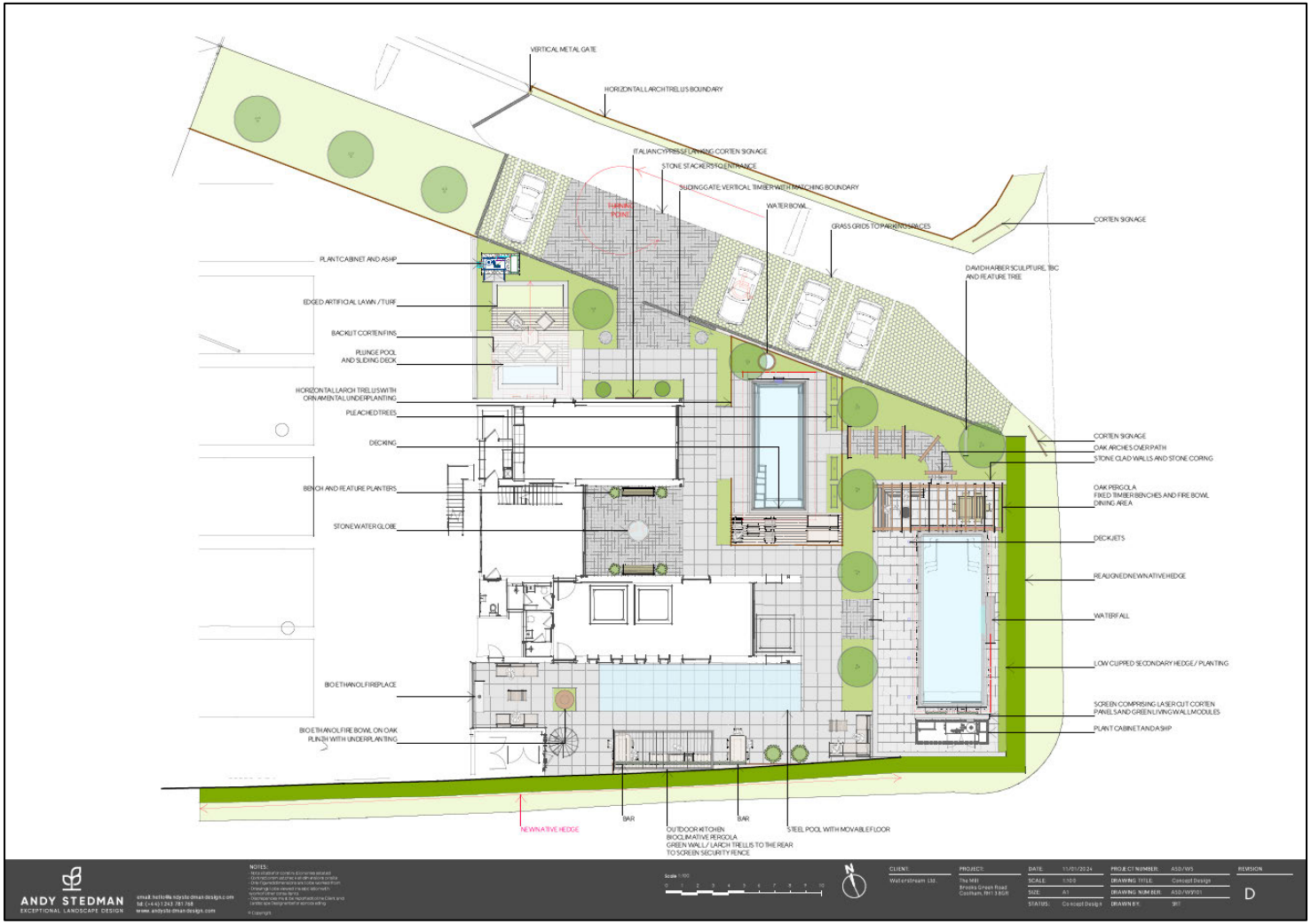
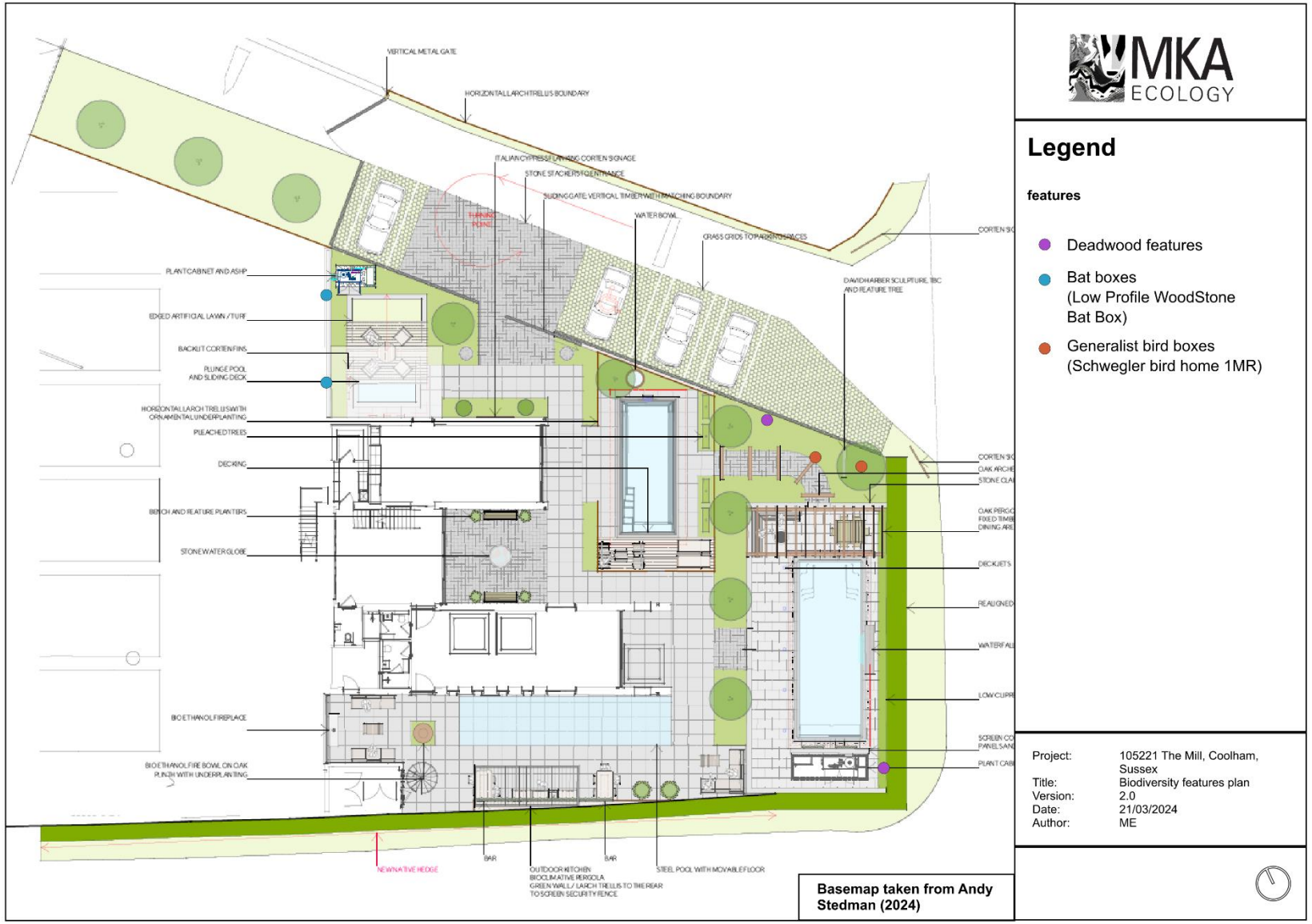


Figure 2: Locations of biodiversity features at The Mill, Coolham





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MKA Ecology Limited, New Cambridge House, Bassingbourn Road, Litlington, Cambridgeshire SG8 0SS
01763 262 211 | info@mkaecology.co.uk | www.mkaecology.co.uk