

The background of the page is composed of several overlapping, wavy, green shapes that create a sense of movement and depth. These shapes are filled with various patterns of green plants, including ferns and other foliage, which are visible through the semi-transparent green layers.

Precautionary Working Method Statement

Land at Shuckers Farmhouse,
Nuthurst

June 2026

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Folkes Architects
On behalf of John Correy
Shuckers Farmhouse
Copsale Road
Nuthurst
RH13 6QY

Version	Written by:	Checked by:	Authorised by:	Date:
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1. Introduction

Scope of Works

- 1.1 Phlorum was commissioned by Folkes Architects to produce a Precautionary Working Method Statement (PWMS) in relation to bats.
- 1.2 This Method Statement and following Risk Assessment describes works that are to take place in order to ensure that protected species are not adversely affected by the works associated with Shuckers Farmhouse, Copsale Road, Nuthurst, RH13 6QY (hereafter referred to as 'the site').
- 1.3 A habitat map of the site is shown in Appendix A.

Description of Works

- 1.4 Current proposals for the site include the extension of the main house and, construction of a garage and pool house and pool.
- 1.5 The works would include the removal of one tree, various parcels of modified grassland, and removal of a portion of building one to accommodate the extension.

Summary of Ecological Surveys

- 1.6 The Preliminary Ecological Appraisal and Potential Roosting Assessment (PEA PRA) was undertaken on the 5th January 2026, further Ground Level Tree Assessments (GLTA) were undertaken on the 27th May 2026.
- 1.7 The site comprised buildings, hardstanding, modified grassland, other standing water, bare ground, artificial unvegetated unsealed surface, native hedgerow, built linear feature, hedgerow with trees, and individual trees. The surrounds consist of arable fields, line of trees, and hedgerows. There appear to be seventeen ponds and a large streams within 500m of the site, and seven ponds, and a large stream within 250m of the site
- 1.8 The following recommendations were made in relation to bats in the Preliminary Ecological Appraisal:
 -  Based on the current plans the impact on the existing roof is limited and therefore a watching brief by a suitable licence bat ecologist is required while these works are carried out. However, if the scope of works increases then bat surveys may be required of building one.

County Ecologist Comments

- 1.9 The following Comments were provided by Horsham District Council:

"European Protected Species: bats It appears from Section 5.27 of the Preliminary Ecological Appraisal Version VI (Phlorum Limited, January 2026) that there may be removal of trees to facilitate the works. Therefore, we request clarification as to whether a Ground Level Tree Assessment (GLTA) for Potential Roost features (PRFs) for roosting bats has been undertaken on those trees which may be removed. This is required prior to determination to ensure no bats or their roosts are impacted and if they are to be impacted, are suitably mitigated and compensated for.

In addition, we understand from the Preliminary Ecological Appraisal Version VI (Phlorum Limited, January 2026) that the proposed extension will involve the roofing membrane sliding beneath the existing tiles on Building One (B1) (residential house). Although the area of the proposed works has negligible bat roost potential and the thatched roof will not be impacted by the works, we agree that the construction activities may disturb any bats present in the building. Therefore, we support the recommendation in Section 5.5 of the Preliminary Ecological Appraisal Version VI (Phlorum Limited, January 2026) for a 'watching brief' by a suitably qualified ecologist. Therefore, the outline measures for a non-licensed Precautionary Method Statement for bats needs to be submitted to the LPA prior to determination in accordance with Government Standing Advice.

The additional information for bats is required prior to determination because paragraph 99 of the ODPM Circular 06/2005 highlights that: "It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision."

This information is therefore required to provide the LPA with certainty of likely impacts on legally protected species and be able to secure appropriate mitigation either by a mitigation licence from Natural England or a condition of any consent. This will enable the LPA to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006 (as amended) and prevent wildlife crime under s17 Crime and Disorder Act 1998."

Scope of the PWMS

- 1.10 This PWMS has considered the scope and nature of the proposed works and assesses how those works could potentially affect bats. Mitigation measures to be employed during the site works are provided, which include both general and species-specific measures. This document highlights the legislation applicable to protected species and the procedures to be followed should they be recorded on site during the works.

2. Method Statement

Ecological Risk Management

- 2.1 The below paragraphs set out reasonable measures that will be taken reduce risks and avoid affecting European Protected Species during the works. A risk assessment for the works is provided in appendix B.
- 2.1 Bats receive protection under The Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 (as amended).
- 2.2 The findings of the PEA demonstrate that the roof space of building had negligible potential for roosting bats, however construction activities may disturb any bats present. The proposed extension will be positioned adjacent to the existing kitchen beneath this clay-tiled roof, with the flat roof fitting below the tiled roofline and the roofing membrane sliding beneath the existing tiles, resulting in minimal interaction with the roof structure. It is recognised that construction activities may have the potential to disturb bats should they be present elsewhere within the building. This risk is considered low given the nature and location of the works but cannot be entirely discounted.

Timing of works

- 2.3 Due to the low risk of impacts to bats, there are no restrictions for timings of the works. However, we recommend the works are undertaken during the active period when bats are considered least vulnerable (taken to run between April and October inclusive).

Pre development

- 2.4 At least one bat box (Schwegler 1FF, 2FN or similar) will be installed upon a suitable location, either upon building or mature tree, within the grounds of the site. Bat boxes will be installed no less than 4 metres (m) from ground level, away from artificial light, and should be south or southwest facing. This bat box will be retained following the completion of the development to serve as enhancement for the site in relation to bats.

Inspection and toolbox talk

- 2.5 Prior to the commencement of the works, all on-site contractors will be given a Tool Box Talk by the supervising ecologist. The contractors will be made aware of the potential presence of roosting bats. The talk will explain the legislation protecting bats, as well as the ecological risks posed by the works, and the methodology that must be followed to avoid any impacts on bats.

- 2.6 The supervising ecologist will inspect the northwestern aspect of the building and the roof for evidence of bats. If no bats or evidence of bats is observed, the works will be undertaken with a precautionary approach and under the supervision of the site ecologist.

Precautionary Working Measures

- 2.7 In accordance with Bat Conservation Trust (2023) guidance, the building is assessed as having **negligible** potential for roosting bats. No further bat surveys or licensing are required, provided works proceed as described. If bats are unexpectedly encountered during works, activities should cease and ecological advice sought, in line with relevant wildlife legislation.

Building Works

-  An ecological watching brief by a suitably qualified ecologist will be undertaken to oversee any removal of roof tiles and other features, where the ecologist considers this to be necessary;
 -  If roof tiles need to be removed, then this must be done carefully, by hand. Once removed, each tile must be carefully turned to check for bats. The supervising ecologist will inspect the area regularly for the presence of bats or droppings
 -  The ecologist will have a bat rescue kit and any bats encountered will be captured and placed within the new bat box.
 -  The ecologist will remain on site until all the potential bat roosting features have been removed or exposed or until the ecologist is confident there are no bats roosting in the building;
 -  The ecologist may then return to the site to oversee subsequent phases of the roof works, if considered necessary; and
 -  Based on the absence of any confirmed roosts, post development monitoring is unlikely to be required.
- 2.8 If a bat is found, the contractors will stop works immediately to minimise disturbance. The ecologist will be informed and a licence will need to be obtained from Natural England before any further works can take place to the building. Once the building is considered unsuitable for bats (the ecologist will advise), works can continue without ecological supervision.
- ### **Noise and Vibration**
- 2.9 General construction activities should maintain acceptable noise thresholds to protect any potential bat roosts.
- 2.10 The development works should be restricted to daylight hours, outside of dusk and dawn emergence times.

Lighting

- 2.11 Different species of bat have been found to react differently to night-time lighting however research has found that generally, all species of bats are sensitive to artificial lighting and that excessive lighting can delay bats from emerging, thus shortening the time available for foraging, as well as causing individuals to move away from suitable foraging grounds or roost sites, to alternative dark areas (Stone, 2014). Bats can also become isolated from their foraging grounds if the linear features they use for commuting are suddenly illuminated, creating a light barrier (Stone, 2014).
- 2.12 The current site sits within a rural residential area and is expected to be subject to a low degree of artificial lighting at night. Nevertheless, the development should serve to maintain value for foraging bats and to minimise indirect impacts from lighting associated with the revised building. This can be achieved by following accepted best practice (Chartered Institute of Ecology and Environmental Management 2023, Institute of Lighting Professionals 2023, Bat Conservation Trust, 2023):
- The level of any artificial lighting including flood lighting should be kept to a minimum, particularly around the site boundaries;
 - LED lights are a preferred option to low pressure sodium lights or high pressure sodium or mercury lamps. LED lights do not emit UV radiation, towards which some insects are attracted, drawing them away from bat foraging areas in the surrounding landscape;
 - all lights should be directed at a low angle with minimal light spillage wherever possible;
 - ideally the site boundaries should be kept dark, preferably at bat emergence (0-1 hour after sunset) and during peak bat activity periods (e.g. 1.5 hours after sunset and 1.5 hours before sunrise);
 - Artificial lighting should not directly illuminate any potential bat commuting areas such as boundary features. Similarly, any newly planted linear features or buffer areas around the site boundary should not be directly lit; and
 - If security lights are required, then they will be set on a Passive Infrared (PIR) sensor and timer so that the light is only emitted for the short time period required.

General measures

- 2.13 A daily log will be kept that will include records and locations of any protected species or habitats and/or alien invasive species found during the site clearance works.
- 2.14 All onsite workers have a responsibility to:
- Identify hazards and assess risks while carrying out the site survey;

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- Determine appropriate actions to eliminate any identified hazards and take appropriate action to reduce risks, while carrying out the site survey;
- Assess if the work conditions are unsafe, and stop the site survey, and leave site if conditions are unsafe; and
- Ensure that the above are all communicate to top managers and clients as required.

Appendix A

Habitat map



Figure 1 - PEA map for Shuckers Farmhouse, Nuthurst

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Job No: 14034
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Appendix B

Risk Assessment

RISK ASSESSMENT: Biodiversity Method Statement

Job Number: 14034
Job Title: Shuckers Farmhouse



Activity or work to be undertaken	Description of working environment
Extension of the main house and construction of a garage, pool house and pool.	Development of a site.

People at risk	Phlorum workers, plus the main contractor workers
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Hazard	Cause and potential consequence	Risk rating (RR) before control			HC E S EC AC PPE	Control measures	Risk rating (RR) after control		
		S	L	Initial RR			S	L	Final RR
Failure of ensuring legal compliance	Working resulting in legal offence and potential prosecution as a result of impact on protected ecological habitat or species.	5	5	25	AC	Certain ecological habitats and species are protected under UK legislation. Some habitats/ species are protected under International law. Ensure all works complies with the appropriate legislation. Ensure ecological surveys are carried out prior to any works. Ensure that any works that impacts on protected habitats or species has the appropriate licences/approval, and the works are supervised by an ecologist, as required.	3	3	9
Bats	Kill, injure, or take any bat or destroy their roost.	5	4	20	AC	The ecologist will carry out a ground based visual inspection for signs of bats, as well as inspection at height (using a MEWP) to inspect roof tiles and bat roosting features in trees. If a bat or a bat roost is found in an area then the ecologist will leave the area and limit any disturbance. Ensure that an ECoV is used to supervise the removal of roof tiles on potential roost sites, as well as the felling of trees with potential bat roosting features. This will involve any initial inspection prior to any works, and then supervision of the works until all potential bat roost features have been dismantled/removed. Clearance work to occur between May and September, inclusive, which is outside of their hibernation period. Bat boxes will need to be installed to ensure that there is continuity of potential bat roost, if a bat roost is being removed.	4	3	12
Work in proximity to tree root protection areas	Tree Preservation Orders (TPOs) can be applied to any trees and make it an offence to cut down, top, lop, uproot, or wilfully damage the tree. BS 5837 provides guidance on trees and includes root protection areas.	4	4	16	AC	Ensure that protective fences are installed around the root protection areas of all trees and hedges retained on site. Signage will also need to be installed on the fences to warn workers of these areas. If any works are required in the fenced off areas then approval will be needed from the local tree officer.	3	3	9
Working at height	Inspecting roof tiles at height. Falls from height, resulting in broken limbs and/or death.	5	3	15	PPE	All on site wear PPE, including hi-vis jackets, hard hats and safety boots. Ensure all operative use approved access method to the roof. A mobile elevated work platform (MEWP) will be provide to provide a safe access ot the roof. A qualified operator will operate the MEWP.	5	2	10
Demolition and construction works	Potential harm to protected species.	4	3	12	AC	A suitably qualified ecologist will perform a walkover of the site before works commence. The ecologist will give a toolbox talk to ensure all construction staff on site are aware of the potential protected species on site. If any protected species are found onsite during the demolition and construction phase all works will cease, and a suitably qualified ecologist should be contacted immediately.	3	2	6
Ground Conditions	Falls or trips on uneven ground conditions could result in breaks, cuts or bruises, potential death if large falls.	5	2	10	PPE	Assess the terrain before walking across the site. Do not survey areas were the ground can not be assessed. Ensure good foot wear worn.	3	1	3
Insect bites (e.g. wasps, bees, and hornets) and bites from other animals (e.g. bats, and snakes).	Surveys may results in wasps nests being disturbed and stinging operatives. Scratches and bites from bats could result in salmonella and or malaria.	5	2	10	AC	Ensure that all workers have informed the top management if they are allergic to insects stings. If wasps, hornets, bees nests are known, or discovered in an area, then do not work in the area until the nest is removed. Workers that are allergic to insects bites should always carry with them a suitable treatment system. Ensure gloves are worn if bats need to be handled. Only qualified and licensed workers to handle bats. Ensure that malaria jabs are taken by all workers likely to handle bats.	3	1	3

Further information			
Risk Matrix Table 1. method statement.			
	Name:	Position	Date
Prepared by:	Chloe Ruddell	Environmental Consultant	02/06/2026
Checked by:	Richard Schofield	Director	04/06/2026

Table 1: Risk matrix table (Severity multiplied by Likelihood)

		Likelihood (L)				
		Rare 1	Unlikely 2	Possible 3	Likely 4	Almost certain 5
Severity (S)	Negligible 1	1	2	3	4	5
	Minor 2	2	4	6	8	10
	Moderate 3	3	6	9	12	15
	Major 4	4	8	12	16	20
	Catastrophic 5	5	10	15	20	25

Critical /High risks (15 to 25) – Unacceptable. The proposed works needs to be reviewed and/or changed, or mitigating action must be implemented to reduce risks, before works commences.

Moderate risk (5 to 12) – Acceptable: the activity, equipment, systems of work must be reviewed and where reasonably practicable additional measures identified and implemented to reduce the risk to low, where possible.

Low risk (1 to 4) – Acceptable: Usually, no further action will be required except for monitoring to make sure that the risk levels do not change. However, if it is possible to reduce the risk levels still further, by using controls that are reasonably practicable, then this should be done.

Value		Severity (type of injury/illness/environmental issues)
5	Catastrophic	- Fatality or major injuries. - Illness/ medical condition result incapacity to work. - Major pollution incident, and/or toxic environmental damage. - Legal non-conformity.
4	Major	- Fracture of major bone or skull, loss of limb or eye. - Any injury/illness leading to more than 1 month off work. - High environmental damage.
3	Moderate	- Fractures (hand, wrist, ankle etc.) - Any other injury/illness leading to between 3 days and 1 month off work. - External medical treatment required. - Medium environmental damage.
2	Minor	- Minor ill health. - Injury/illness leading to less than 3 days off work - Some minor first aid required. - Low environmental damage.
1	Negligible	- Minimal or no environmental or health and safety issues. - No injuries requiring first aid requirements.

Value		Likelihood of occurrence
5	Almost certain	- Will undoubtedly happen/recur possibly frequently. - Expected to occur in normal circumstances (75-100%). [Legal non-conformity although not likely to happen will be given a default rating of 25, to show its severity and importance].
4	Likely	- Will probably happen/recur but it is not a persisting issue. - Probably will occur in time (50-75%).
3	Possible	- Might happen or recur occasionally. - May occur in time (25-50%).
2	Unlikely	Very unlikely to occur, only in exceptional circumstances, but it is possible it may do so (25%).
1	Rare	This will probably never happen. No previous incidence of non-compliance (less than 1%).

Hierarchy of Control:

Abbreviation	Hierarchy of Control (HC)	
E	Elimination	Eliminate the hazard.
S	Substitution	Provide an alternative that is capable of performing the same task and is safer to use.
EC	Engineering Controls	Provide or construct a physical barrier or guard.
AC	Administrative Controls	Develop policies, procedures and guidelines, in consultation with employees, to mitigate the risk. Provide training, instruction and supervision about the hazard.
PPE	Personal Protective Equipment	Personal equipment designed to protect the individual from the hazard.



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