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Hornbrook Farm, Brighton Road, Horsham, West Sussex

Ecological Impact Assessment

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Hornbrook Farm, Brighton Road, Horsham, West Sussex

Ecological Impact Assessment

Client:	Jaynic Properties Ltd	
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Abbreviations

ACIB	Areas that could become of importance to biodiversity
APIB	Areas of particular importance for biodiversity
BMEP	Biodiversity Mitigation and Enhancement Plan
BoCC	Birds of Conservation Concern
CEMP	Construction Environmental Management Plan
CIEEM	Chartered Institute of Ecology and Environmental Management
CRoW	Countryside and Rights of Way Act 2000
EclA	Ecological Impact Assessment
ECow	Ecological Clerk of Works
EPS	European Protected Species
GCN	Great Crested Newt
HPI	Habitat of Principal Importance
IEF	Important Ecological Features
LEMP	Landscape and Ecological Management Plan
LGS	Local Geological Sites
LNR	Local Nature Reserve
LNRS	Local Nature Recovery Strategy
LWS	Local Wildlife Sites
MAGIC	Multi-agency Geographic Information for the Countryside

NERC	Natural Environment and Rural Communities Act 2006
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
PEA	Preliminary Ecological Appraisal
PPG	Planning Practice Guidance
SAC	Special Areas of Conservation
SNCI	Site of Nature Conservation Importance
SPA	Special Protection Areas
SPI	Species of Principal Importance
SSSI	Site Special Scientific Interest
SxBRC	Sussex Biological Records Centre
WCA	Wildlife and Countryside Act 1981 (as amended)
Zol	Ecological Zone of Influence

0 Executive Summary

- 0.1.1 This report presents an Ecological Impact Assessment for the site of a proposed residential development at Land at Hornbrook Farm, Brighton Road, Horsham.
- 0.1.2 The Ecological Impact Assessment process was undertaken with reference to relevant parts of the *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*, and in the context of national planning policy and guidance, local planning policy, and UK wildlife and animal welfare legislation.
- 0.1.3 Baseline information was obtained from a series of ecology surveys carried out within the Application Site by professional ecologists during 2021, 2023, 2024 and 2025, including an ecology desk study, Preliminary Ecological Appraisal, and appropriate protected species surveys (including surveys for great crested newt, breeding birds, roosting bats in trees, foraging and commuting bats, hazel dormouse, otter / water vole and reptiles).
- 0.1.4 Mitigation designed into the Proposed Development is described in Chapter 5. The assessment of impacts carried out here takes this mitigation into account.
- 0.1.5 Evaluation of the baseline survey work identified the following Important Ecological Features relevant to the development: Running water; Hedgerows Habitat of Principal Importance; Nesting birds; Roosting bats – trees; Foraging and commuting bats; Otter; Water vole; and Reptiles
- 0.1.6 Following the assessment of impacts of the Proposed Development during its construction and operation phases, additional mitigation is proposed, including:
- ▶ Sensitive lighting strategy to reduce impact upon trees with potential bat roost suitability and bat foraging and commuting habitat;
 - ▶ A pre-works check of the north-western boundary vegetation will be undertaken to reduce the risk of killing / injury and habitat disturbance to otter and water vole.
 - ▶ Removal of suitable reptile habitat will be undertaken in accordance with a method statement to reduce the risk of killing / injury to reptiles during the proposed works.
 - ▶ Creation of other neutral grassland, mixed scrub and individual trees, alongside new hedgerow to mitigate the impact of the Proposed Development of foraging and commuting bats and increase the resource available to these species and other species;
- 0.1.7 Detailed method statements for the ecological mitigation and enhancement associated with the Proposed Development will be set out in a Construction Environmental Management Plan, Biodiversity Mitigation and Enhancement Plan and Landscape and Ecological Management Plan, the production of which is anticipated to be subject to planning conditions.

- 0.1.8 Table 0.1 outlines the residual effects following the implementation of additional mitigation measures not already embedded in the design of the Proposed Development and identifies whether these are significant in relation to national and local planning policy. Within this Ecological Impact Assessment, significant residual negative effects are those at the level of moderate, major or substantial; minor and negligible negative effects are not considered to be significant. No residual effects that are significant in terms of national or local planning policy are anticipated to occur as a result of the Proposed Development.

Table 0.1: Residual effects

Feature	Significant residual effects	
	Construction phase	Operation
Hedgerows Habitat of Principal Importance	No significant effect	N/A
Roosting bats – trees	No significant effect	No significant effect
Foraging and commuting bats	No significant effect	No significant effect
Otter	No significant effect	N/A
Water vole	No significant effect	N/A
Reptiles	No significant effect	N/A

- 0.1.9 Recommendations for additional enhancements are provided in Table 5.4 of the Preliminary Ecological Appraisal and will be incorporated as part of the Proposed Development.

1 Introduction

1.1 Purpose of this Report

- 1.1.1 Urban Edge Environmental Consulting was commissioned by the applicant, Jaynic Properties Ltd and Hornbrook Developments LLP, to produce an Ecological Impact Assessment (EcIA) Report for the site of a proposed residential development at Land at Hornbrook Farm, Brighton Road, Horsham (Grid Reference: TQ 18906 29780). Joe Dale BSc (Hons) MSc Qualifying Member of CIEEM is the principal author of this report.
- 1.1.2 This standalone report was commissioned in order to provide a single document containing the ecological baseline and assessment information for the proposed development. The EcIA identifies features of ecological importance (including legally protected sites and species), specifies mitigation requirements for the Proposed Development, and supports the implementation of national biodiversity strategies and national planning policies for the preservation of biodiversity whilst enabling sustainable development.



1.2 Objectives of this Report

- 1.2.1 The objectives of the Ecological Impact Assessment are:
- ▶ To identify and describe all likely significant ecological effects associated with the Proposed Development;
 - ▶ To set out the mitigation measures required to ensure compliance with nature conservation legislation and to address any significant effects;
 - ▶ To identify how mitigation measures will be secured;
 - ▶ To provide an assessment of the significance of any residual effects;
 - ▶ To identify appropriate enhancement measures; and
 - ▶ To set out the requirements for post-construction monitoring of likely effects identified.

1.3 Site Description

- 1.3.1 The survey area is larger than the Application Site boundary, as a result of a change in the size of the Application Site after the surveys had been completed. The majority of the survey area contains the Application Site, barring a linear strip of habitat on the south-eastern boundary, within which a visibility splay will be created. The Application Site measures c.9.23ha and its extent is shown in blue on Figure 1.1.

- 1.3.2 The survey area lies to the south-east of the town of Horsham in the Horsham District of West Sussex. It comprises c.10.25ha of undeveloped agricultural land. The open grassland fields are interspersed by hedgerows, with strips of woodland and Horn Brook located along the site boundaries, and occasional patches of tall ruderal, bracken and scrub. The extent of the survey area is outlined in red on Figure 1.1
- 1.3.3 The site is bound by Horn Brook and woodland to the north and west; Doomsday Lane to the east; and Brighton Road (A281) to the south. The wider landscape is dominated by farmland and housing associated with Horsham, with large blocks of woodland to the east. Six ponds lie within 500m of the site.

1.4 Proposed Development

- 1.4.1 Outline planning application for up to 180 dwellings, open space, and associated works and infrastructure with all other matters reserved apart from access. The Illustrative Masterplan is shown in Figure 1.2.

Hornbrook Farm, Horsham, West Sussex

-  Survey area
-  Application Site

Figure 1.1: Site location plan



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Ordnance Survey AC0000808122

Scale (at A4): 1:5,000 Created by: EM

Date: Jan 2026 Reviewed by: NP

Drawing number:

UE0470ECO-Hornbrook: Site location: 260119





Figure 1.2: Illustrative Masterplan

2 Planning Policy and Legislation

2.1 Introduction

- 2.1.1 This section briefly summarises planning policy, legislation and related issues which are relevant to the Proposed Development. The following text does not constitute legal or planning advice.

2.2 National Planning Policy

National Planning Policy Framework

- 2.2.1 The National Planning Policy Framework (NPPF; MHCLG, 2024) outlines the Government's commitment to the conservation of wildlife and natural features. Section 15 aims to conserve and enhance the natural environment by avoiding, adequately mitigating or compensating for significant harm to biodiversity, and delivering net gains for biodiversity. The planning system is required to (Paragraph 187):
- ▶ *"Protect and enhance valued landscapes, sites of biodiversity or geological conservation value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
 - ▶ *"Recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
 - ▶ *Maintain the character of the undeveloped coast, while improving public access to it where appropriate;*
 - ▶ *"Minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current & future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*
 - ▶ *"Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
 - ▶ *"Remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate."*
- 2.2.2 The NPPF requires that local plans should: *"distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value...; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale*

across local authority boundaries" (Paragraph 188). To protect and enhance biodiversity and geodiversity, the NPPF states that planning policies should (Paragraph 192):

- ▶ *"Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- ▶ *"Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."*

2.2.3 When determining planning applications, local planning authorities should aim to protect and enhance biodiversity by applying the following principles (Paragraph 193):

- ▶ *"If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- ▶ *"Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- ▶ *"Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- ▶ *"Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate."*

2.2.4 At Paragraph 194 it is stated that: "the following wildlife sites should be given the same protection as habitats sites:

- ▶ *"Potential Special Protection Areas and possible Special Areas of Conservation;*
- ▶ *"Listed or proposed Ramsar sites; and*
- ▶ *"Sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."*

2.2.5 At Paragraph 195 it is stated that: "the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site" [commonly referred to as Habitats Regulations Assessment].

2.2.6 In Paragraph 198 the NPPF states that *“planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In so doing they should... limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”*. This applies to protected species that are a material consideration in the planning process including bats and may also apply to other light sensitive species.

2.2.7 The policies within the NPPF (and accompanying guidance) are a material planning consideration.

Planning Policy Guidance

2.2.8 The online Planning Practice Guidance¹ (PPG) accompanies the NPPF and provides detailed guidance on plan making and the determination of planning applications. Its section on the natural environment² addresses: agricultural land, soils and brownfield land of environmental value; green infrastructure; biodiversity, geodiversity and ecosystems; and landscape. In relation to biodiversity, it presents details on minimising impacts, delivering net gains, plan making, decision taking, protected sites/species, and irreplaceable habitats including ancient woodland.

2.2.9 The Office of the Deputy Prime Minister Circular 06/2005 provides further detailed guidance on the application of the law relating to planning and nature conservation in England. It complements the expression of national planning policy in the NPPF and PPG. The Circular includes guidance on internationally and nationally designated sites, habitats and species outside of designated sites, and protected species. The PPG and Circular 06/2005 are a material planning consideration.

2.2.10 Paragraph 98 of Circular 06/2005 advises that the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Local authorities should hence *“consult Natural England before granting planning permission. They should consider attaching appropriate planning conditions or entering into planning obligations under which the developer would take steps to secure the long-term protection of the species. They should also advise developers that they must comply with any statutory species’ protection provisions affecting the site concerned...”*

2.2.11 Paragraph 99 of Circular 06/2005² advises 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. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning*

¹ Ministry of Housing, Communities and Local Government (2016): *Planning Practice Guidance*. Accessed online [18/02/2026] at: <https://www.gov.uk/government/collections/planning-practice-guidance>

² Ministry of Housing, Communities and Local Government (2016): *Planning Practice Guidance: Natural environment*. Accessed online [18/02/2026] at: <https://www.gov.uk/guidance/natural-environment>

conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted."

- 2.2.12 In addition, Natural England offers 'Standing Advice'³ on protected sites and species which contains information on potentially significant impacts, and provides advice to planners on deciding if there is a reasonable likelihood of protected species being present. It also addresses recommended survey effort, timing and methods with regard to protected species, together with appropriate mitigation measures, in relation to planning applications. The Standing Advice is a material consideration in planning decisions. The Chartered Institute of Ecology and Environmental Management (CIEEM) also provide guidance on survey standards and impact assessment techniques (e.g. CIEEM, 2018).

2.3 Local Planning Policy

Adopted Local Plan

- 2.3.1 The following policies relating to wildlife and biodiversity are contained within the adopted Horsham District Planning Framework (Horsham District Council, 2015):

Green Infrastructure and Biodiversity

- 1. 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.*
- 2. 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. Where felling of protected trees is necessary, replacement planting with a suitable species will be required.*
- 4. a) 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)*

³ Natural England (2016): *Planning and Development: Protected Sites and Species*. Accessed online [18/02/2026] at: <https://www.gov.uk/topic/planning-development/protected-sites-species>

- ▶ *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.*

b) 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.*

5. 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.

West Sussex Local Nature Recovery Strategy

- 2.3.2 West Sussex County Council published the draft West Sussex Local Nature Recovery Strategy (LNRS) in October 2025, with the finished document expected in early 2026. The primary purpose of the LNRS is to identify locations to create or improve habitat most likely to provide the greatest benefit for nature and the wider environment by creating networks of bigger, better and more connected habitats.
- 2.3.3 The West Sussex LNRS includes three main types of map:
- ▶ Areas of particular importance for biodiversity (APIB) maps. APIBs identify national conservation sites, local nature reserves, local wildlife sites and areas of irreplaceable habitat in West Sussex.
 - ▶ The Measures Map, which identifies locations where the measures set out in the Statement of Biodiversity Priorities could be carried out to deliver the greatest benefit to biodiversity and/or the wider environment
 - ▶ Areas that could become of importance for biodiversity (ACIB). ACIBs. These are the areas in which the potential measures should be carried out to help East Sussex and Brighton & Hove to achieve bigger, better and more joined up habitat, as set out in the biodiversity priorities.
- 2.3.4 The woodland and scrub habitat surrounding Horn Brook, along with the majority of the eastern and southern portions of the Application Site are ACIBs.
- 2.3.5 There are no other APIBs or ACIBs within or adjacent to the survey area.

Local Wildlife Sites

- 2.3.6 Local Wildlife Sites (LWS) are areas of land with wildlife value of significance at the district or county scale. LWS support both locally and nationally threatened wildlife, and many sites contain Habitats of Principal Importance (HPI) or Species of Principal Importance (SPI). LWS are protected within the local planning system and are a material consideration in the determination of planning

applications. A similar system of Local Geological Sites (LGS) operates in relation to features of district/county geological significance.

2.4 Legislation

General

- 2.4.1 The main legislative instruments for ecological protection in England and Wales are the Wildlife and Countryside Act 1981 (WCA; as amended), Countryside and Rights of Way Act 2000 (CRoW; as amended), Natural Environment and Rural Communities Act 2006 (NERC), the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations; as amended) and the Environment Act 2021.
- 2.4.2 WCA consolidated and amended pre-existing national wildlife legislation in order to implement the Bern Convention and the European Union Wild Birds Directive (Council Directive 2009/147/EC). It complements the Habitats Regulations, offering protection to a wider range of species than the latter. The Act also provided for the designation and protection of nationally important conservation sites of value for their floral, faunal or geological features, termed SSSI. Schedules of the act list protected species of flora and fauna, as well as invasive species, and detail the possible offences that apply to these species.
- 2.4.3 CROW amended and strengthened existing wildlife legislation detailed in the WCA. It placed a duty on government departments & the National Assembly for Wales to have regard for biodiversity, provided increased powers for the protection and maintenance of SSSI, and created a right of access to parts of the countryside. The Act contained lists of habitats and species (Section 74) for which conservation measures should be promoted, in accordance with the recommendations of the Convention on Biological Diversity (Rio Earth Summit) 1992.
- 2.4.4 NERC consolidated and replaced aspects of earlier legislation. Section 40 of the Act places a duty upon all local authorities and public bodies in England and Wales to have regard to the purpose of conserving biodiversity in exercising all of their functions, including by restoring or enhancing habitats and species populations. Sections 41 (England) and 42 (Wales) list HPI / SPI to the conservation of biodiversity (otherwise known as priority habitats / species as listed in the now superseded UK Biodiversity Action Plan). These lists supersede Section 74 of the CRoW Act 2000. These species and habitats are a material consideration in the planning process.
- 2.4.5 The Habitats Regulations are the principal means by the European Union Habitats Directive (Council Directive 92/43/EEC) was transposed into English and Welsh law, and place a duty upon the relevant authority of government to identify sites which are of importance to the habitats and species listed in Annexes I and II of the Habitats Directive. Those sites which meet the criteria in Europe are designated as Sites of Community Importance by the European Commission, and subsequently identified as SAC by the European Union member states. Since the UK's departure from the European Union the European Commission no longer has a role in designating SAC in the UK. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 establish a single stage designation process, where the appropriate authority is the decision maker. The selection and designation of SAC is based on the criteria set out in Annex III of the

Habitats Directive insofar as it applies to the UK, and having regard to the advice of the appropriate nature conservation body.

- 2.4.6 The 2019 Amendment Regulations have created a new national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes existing SAC, existing SPAs originally designated as a result of Council Directive 2009/147/EC on the Conservation of Wild Birds, and any new SAC and SPA designated under the 2019 Regulations. SAC and SPA in the UK therefore no longer form part of the EU's Natura 2000 ecological network.
- 2.4.7 The Habitats Regulations also provide for the protection of individual species of fauna and flora of European conservation concern listed in Schedules 2 and 5 respectively (European Protected Species (EPS)). Schedule 2 includes species such as otter and great crested newt for which the UK population represents a significant proportion of the total European population. It is an offence to deliberately kill, injure, disturb or trade in these species. Schedule 5 plant species are protected from unlawful destruction, uprooting or trade under the regulations. Under the Habitats Regulations disturbance includes any activity which is likely to: impair the ability of a EPS to survive, breed, reproduce, or rear/nurture its young; impair the ability of a EPS to migrate or hibernate; or significantly affect the local distribution or abundance of the species.
- 2.4.8 The Environment Act 2021 establishes an Office for Environmental Protection; mandates all new development requiring planning permission to achieve at least 10% net gain for biodiversity; amends the NERC Act duty to conserve biodiversity by explicitly adding a duty to enhance; and requires local authorities to produce local nature recovery strategies.

Hedgerows

- 2.4.9 The Hedgerow Regulations 1997 protect important hedgerows in the countryside by controlling their removal through a system of notification, and by defining criteria under which a hedgerow is classified as "important". The criteria relate to the value of hedgerows from an archaeological, historical, wildlife and landscape perspective.

Amphibians

Great crested newt

- 2.4.10 Great crested newt (GCN) *Triturus cristatus* is fully protected by the WCA and the Habitats Regulations and is an SPI. The legislation makes it an offence, *inter alia*, to:
- ▶ Intentionally kill, injure or take a great crested newt (including its eggs).
 - ▶ Possess or control a live or dead great crested newt, any part of, or anything derived from a great crested newt.
 - ▶ Intentionally or recklessly damage, destroy or obstruct access to any structure or place that a great crested newt uses for shelter or protection.
 - ▶ Intentionally or recklessly disturb a great crested newt while it is occupying a structure or place that it uses for shelter or protection.

- 2.4.11 Other native amphibians also receive varying degrees of legal protection. Natterjack toad *Epidalea calamita* and pool frog *Pelophylax lessonae* are Habitats Regulations schedule 2 species, partially protected under the WCA and are SPI. Common toad *Bufo bufo* is partially protected under the WCA and an SPI. Smooth and palmate newt *Lissotriton vulgaris* and *L. helveticus* are partially protected under the WCA.

Birds

- 2.4.12 All wild birds are protected by the WCA and 49 are SPIs. The legislation makes it an offence to intentionally kill, injure or take away any wild bird. It is also an offence to take, damage or destroy the nest of any wild bird while it is in use or being built or to take or destroy the egg of any wild bird. In addition, certain species are listed on Schedule 1 of the WCA (such as kingfisher *Alcedo atthis*). This makes it an additional offence to intentionally or recklessly disturb the adults while they are in and around their nest or intentionally or recklessly disturb their dependent young. Such species are considered to be in greater need of legal protection or of high nature conservation priority.
- 2.4.13 Birds of Conservation Concern ("BoCC5) are included on Red and Amber lists (Stanbury *et al.*, 2021). Birds on the Red list are those of highest conservation priority due to significant and sustained population decreases and/or range contractions (e.g. house sparrow *Passer domesticus* and starling *Sturnus vulgaris*). Birds on the Amber list are the next most critical group and include species whose population/range have shown moderate declines, or which have recovered to some extent from historical decline, such as dunnoek *Prunella modularis*.

Mammals

Bats

- 2.4.14 Bats and their roosts are fully protected by the WCA and the Habitats Regulations, and seven species of bats are SPIs. The legislation makes it an offence, *inter alia*, to:
- ▶ Intentionally kill, injure or take a bat.
 - ▶ Possess or control a live or dead bat, any part of a bat, or anything derived from a bat.
 - ▶ Intentionally or recklessly damage, destroy or obstruct access to any structure or place that a bat uses for shelter or protection. This is taken to mean all bat roosts whether bats are present or not.
 - ▶ Intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection.
 - ▶ Make a false statement in order to obtain a licence for bat work.

Hazel dormouse

- 2.4.15 Hazel dormouse *Muscardinus avellanarius* is fully protected by the WCA and the Habitats Regulations and is an SPI. The legislation makes it an offence, *inter alia*:
- ▶ Intentionally kill, injure or take a hazel dormouse.

- ▶ Possess or control a live or dead hazel dormouse, any part of, or anything derived from a hazel dormouse.
- ▶ Intentionally or recklessly damage, destroy or obstruct access to any structure or place that a hazel dormouse uses for shelter or protection.
- ▶ Intentionally or recklessly disturb a hazel dormouse while it is occupying a structure or place that it uses for shelter or protection.

Otter

2.4.16 Otter *Lutra lutra* is fully protected by the WCA and the Habitats Regulations and is an SPI. The legislation makes it an offence, *inter alia*:

- ▶ Intentionally kill, injure or take an otter.
- ▶ Possess or control a live or dead otter, any part of, or anything derived from an otter.
- ▶ Intentionally or recklessly damage, destroy or obstruct access to any structure or place that an otter uses for shelter or protection.
- ▶ Intentionally or recklessly disturb an otter while it is occupying a structure or place that it uses for shelter or protection.

Water vole

2.4.17 Water vole *Arvicola amphibious* is fully protected by the WCA and is an SPI. The legislation makes it an offence, *inter alia*, to:

- ▶ Intentionally kill, injure or take a water vole.
- ▶ Possess or control a live or dead water vole, any part of, or anything derived from a water vole.
- ▶ Intentionally or recklessly damage, destroy or obstruct access to any structure or place that a water vole uses for shelter or protection.
- ▶ Intentionally or recklessly disturb a water vole while it is occupying a structure or place that it uses for shelter or protection.

2.4.18 Various other mammals are also SPI, including hedgehog *Erinaceus europaeus* and brown hare *Lepus europaeus*.

Reptiles

2.4.19 The four common species (slow-worm *Anguis fragilis*, common lizard *Zootoca vivipara*, adder *Vipera berus* and grass snake *Natrix helvetica*) are partially protected under the WCA and are SPIs. They are protected, *inter alia*, against intentional killing and injuring. The handling and translocation of these reptiles does not require a licence.

2.4.20 Smooth snake *Coronella austriaca* and sand lizard *Lacerta agilis* are fully protected by the WCA and the Habitats Regulations and are SPIs. The legislation affords them the same level of protection as bats, GCN, dormouse and otter.

Wild mammals

- 2.4.21 The Wild Mammals (Protection) Act 1996 (as amended) makes provision for the protection of wild mammals from certain cruel acts, making it an offence for any person to intentionally cause suffering to any wild mammal. In the context of development sites, for example, this may apply to rabbit *Oryctolagus cuniculus* burrows and fox *Vulpes vulpes* dens.

Invasive non-native species

- 2.4.22 Under the WCA it is an offence to release, or to allow to escape into the wild, any animal which is not ordinarily resident in and is not a regular visitor to Great Britain in a wild state or is listed under Schedule 9 of the Act. Strictly speaking, this makes it an offence to return to the wild any animal listed on Schedule 9, even if inadvertently captured. It is also an offence to plant or otherwise cause to grow in the wild invasive non-native plants listed on Schedule 9. This effectively means that it is an offence to cause the spread of such plants as a result of development operations.

3 Methodology

3.1 Consultation

- 3.1.1 A pre-application meeting with Horsham District Council was held in August 2025 but pre-application advice in relation to Ecology was not subsequently provided.

3.2 Assessment Methodology

- 3.2.1 The EclA has been prepared with reference to the CIEEM's *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine* (CIEEM; 2018).

3.3 Scope of the Assessment

Ecological Zone of Influence

- 3.3.1 The ecological zone of influence (Zol) was initially defined as the Application Site. As described at section 1.3, the survey area was larger than the Application Site, and the Zol has subsequently been refined through a review of the ecological baseline information in the context of the Proposed Development. The Zol is defined as follows:
- ▶ For the majority of ecological features the Zol coincides with the Proposed Development Site, including adjacent land up to 30m from the Application Site; features within this zone are likely to be directly affected by biophysical changes resulting from construction and operation activities. This additional 30m will contain the majority of the survey area.
 - ▶ Due to the presence of waterbodies within the local area, the Zol for GCN includes a 500m buffer from the Application Site. Populations of GCN within this zone may potentially be directly affected by biophysical changes resulting from construction and operation activities.
 - ▶ Due to the potential for indirect effects (such as dust and noise during operation), the Zol for nationally designated statutory sites, non-statutory designated sites and species was the Application Site plus 2km. The Zol for Natura 2000 sites (SAC, SPA and Ramsar) was extended to the Application Site plus 5km, due to their higher level of legal protection and greater importance for nature conservation.

Temporal scope

- 3.3.2 It is anticipated that planning permission will be granted in Q4 of 2026 with protected species mitigation proposed during late 2027. For the purposes of this assessment it is assumed that construction will commence in Q1 or Q2 of 2028. Construction will take place over approximately 4 years and will become fully operational by Q1 of 2032. Impacts on ecological features are

assessed in the context of how the baseline conditions within the ecological zone of influence may be liable to change between the survey dates and the timings of construction.

3.4 Desk Study

3.4.1 A desk-based study was undertaken in 2021 (UEEC, 2026a) to examine published information and biological records from within the search area. The scope of the desk study reflects the sensitivity and value of potential ecological receptors and enables the requirements of mobile species to be considered (e.g. for breeding, foraging, roosting, shelter, migration and dispersal), while providing contextual information to assist with determining and evaluating the baseline. Ecological features to be considered include designated sites of nature conservation interest, HPI and SPI, protected species and legally controlled species. To that end, the following desk study search radii were established:

- ▶ Statutory nature conservation sites of international importance within a 5km radius of the Site (extended to 10km for any statutory site designated for bats);
- ▶ Statutory sites of national importance within a 2km radius; and
- ▶ Non-statutory sites, priority habitat and protected / notable species records within a 2km radius.

3.4.2 This information was collected from the following sources:

- ▶ The 'MAGIC' (Multi-agency Geographic Information for the Countryside) website: www.magic.gov.uk; and
- ▶ Sussex Biological Records Centre (SxBRC).

3.5 Field Surveys

3.5.1 A range of baseline ecological surveys were undertaken to inform and influence the design and layout of development, and form the basis of the EcIA. For reasons of clarity, and due to the quantity of baseline ecological information collated during the assessment, the detailed methods, weather conditions, personnel, limitations and results of each baseline survey are reported separately. In summary, the following were undertaken:

- ▶ Preliminary Ecological Appraisal (PEA) of the Application Site (UEEC, 2026a) – reported separately;
- ▶ Protected species surveys at the Application Site (UEEC, 2026c; 2026d; 2026e) – reported separately and including the following;
 - Presence / absence survey for GCN;
 - Breeding bird survey;
 - Ground Level Tree Assessment for bats roosting in trees;
 - Bat activity survey;
 - Presence / absence survey for hazel dormouse;

- Presence / absence survey for otter / water vole;
- Presence / absence survey for reptiles.

3.5.2 Baseline ecological surveys undertaken to inform the assessment covered the ZOI defined at 3.3.1. The survey area took into account the likely extent of development activities and such adjacent land as might foreseeably be affected, directly or indirectly, to provide contextual information and further inform the assessment.

3.6 Limitations

- 3.6.1 As mentioned in section 1.3.1, a small section of the Application Site was not surveyed. However, due to its small size and given that this section will be used for a visibility splay, this is not considered to be a major limitation to this report achieving its objectives.
- 3.6.2 It is worth noting that due to the age of the desk-based study, biological records data may now be partially outdated and do not include more recent records. However, as these data are used to supplement the results of the surveys, this is not considered to be a major limitation.
- 3.6.3 Each survey report contains a full review of applicable limitations to each baseline survey. Where relevant any such limitations have been factored into the assessment process. All surveys were undertaken in the appropriate season by suitably qualified and licensed surveyors with reference to industry guidance and during suitable weather conditions, albeit that short periods of suboptimal weather affected a small number of surveys.

3.7 Ecological Impact Assessment

Important Ecological Features

- 3.7.1 A first step in EcIA is to determine which ecological features (habitats, species, ecosystems and their functions/processes) are important. Important Ecological Features (IEF) should then be subject to detailed assessment if they are likely to be impacted by the Proposed Development. It is not necessary to carry out detailed assessment of features that are sufficiently widespread, unthreatened and resilient to project impacts such that there is no risk to their viability.
- 3.7.2 Ecological features can be important for a variety of reasons and the rationale used to identify importance is explained below. Importance may relate, for example, to the quality or extent of designated sites or habitats, to habitat/species rarity, to the extent to which they are threatened throughout their range, or to their rate of decline.
- 3.7.3 The importance of an ecological feature should be considered within a defined geographical context. The following frame of reference is used in this case:
- ▶ International and European e.g. SAC, SPA and Ramsar sites;
 - ▶ National (England) e.g. SSSI and National Nature Reserves;
 - ▶ County (West Sussex) e.g. LWSs, Local Nature Reserves, ancient woodlands;

- ▶ District (Horsham District) e.g. species rich and / or extensive habitats, or moderate population sizes, or species assemblages of moderate to high diversity; and
- ▶ Local (Forest Neighbourhood) e.g. common and widespread species with relatively moderate populations or assemblages of relatively limited diversity; and
- ▶ Negligible - Habitats or species populations were either:
 - not detected within the survey area;
 - the potential for them to be present is negligible; or
 - the habitat / species is present, but its presence is considered insignificant in relation to the local context of Forest Neighbourhood.

Impact assessment

3.7.4 The process of impact assessment involves:

- ▶ Identifying and characterising impacts;
- ▶ Incorporating measures to avoid and mitigate (reduce) the impacts;
- ▶ Assessing the significance of any residual effects after mitigation;
- ▶ Identifying appropriate compensation measures to offset significant residual effects; and
- ▶ Identifying opportunities for ecological enhancement.

3.7.5 It is only necessary to assess and report significant residual effects (those that remain after mitigation measures have been taken into account). However it is good practice for the EclA to make clear both the potential significant effects without mitigation and the residual significant effects following mitigation. This process of assessment without mitigation helps to identify necessary and relevant mitigation measures that are proportionate to the extent, magnitude and duration anticipated impacts.

3.7.6 The assessment only needs to describe those characteristics of impacts that are relevant to understanding the ecological effect and determining its significance. It should consider, as appropriate: direct, indirect, secondary and cumulative impacts and whether the impacts and their effects are short, medium, long-term, permanent, temporary, reversible, irreversible, positive or negative. The assessment of impacts then takes into account the baseline conditions to describe:

- ▶ How baseline conditions within the Zol will change as a result of the Proposed Development and associated activities; and
- ▶ Cumulative impacts of the Proposed Development and those arising from other developments within the Zol.

Characterising and quantifying impacts

3.7.7 The term 'impact' relates to changes resulting from Proposed Development activities, for example the removal of habitat.

- 3.7.8 The CIEEM (2018) guidelines state that ecological impacts and effects should be characterised in terms of ecosystem structure and function and reference should be made, as required, to: positive, negative or neutral effects; extent; magnitude; duration; frequency and timing; reversibility; and cumulative effects. The guidelines provide a list of 'aspects of ecological structure and function to consider when predicting impacts and effects' (CIEEM, 2018, Box 17).
- 3.7.9 For the purposes of this EcIA, the duration of impacts is defined as:
- ▶ Short-term – Less than two years i.e. during site preparation and initial construction;
 - ▶ Medium-term – Two to six years i.e. during construction; or
 - ▶ Long-term – Greater than six years i.e. during operation.
- 3.7.10 However, it should be noted that these terms are considered in the assessment relative to each habitat or species affected and their respective successional processes or life-cycles. For example, six weeks for one species may represent a single generation time period, but for another it may be a few weeks in a life lasting several years.

Determining significant effects

- 3.7.11 The term 'effect' relates to the outcome of an impact, for example population displacement or decline due to habitat loss.
- 3.7.12 Following the characterisation of impacts, an assessment of the ecological significance of an effect is made. Applying the principles promoted in the guidelines, significant effects encompass impacts on the structure and function of a defined site, habitat or ecosystem, and/or the conservation status of habitats and species populations at an appropriate geographic scale. However, the scale of significance of an effect may not be the same as the geographic context in which the feature is considered important. For example, an effect on a SPI in England may not have a significant effect on its national population and therefore not be of national significance for that species. Hence the value of the feature that will be significantly affected is used to determine the implications, in terms of legislation and or policy (CIEEM, 2018), and proportionate means of mitigation.
- 3.7.13 Significance is a concept related to the weight that should be attached to effects when decisions are made. For the purpose of this assessment, 'significant effect' is an effect that either supports or undermines biodiversity conservation objectives for IEFs. A significant effect is simply an effect that is sufficiently important to require assessment and reporting so that the decision maker is adequately informed of the environmental consequences of permitting a project. The EcIA guidelines (CIEEM, 2018, p41) state that *"a significant effect does not necessarily equate to an effect so severe that consent for the project should be refused planning permission. For example, many projects with significant negative ecological effects can be lawfully permitted following EIA procedures"* – particularly where the mitigation hierarchy has been applied effectively as part of the decision-making process. The assessment of significance is based on professional judgement, guided by independently established significance criteria where available and appropriate (e.g. in relation to atmospheric pollution impacts).

Cumulative effects

- 3.7.14 A desk-based search for other projects within 2km of the Application Site, which submitted their applications within the last five years and which were for developments in excess of ten dwellings, was undertaken. These parameters were chosen, as developments that matched this criteria could collectively cause significant impacts to arise upon IEFs relevant to the Proposed Development. The projects which could lead to collectively significant impacts include:

Former Novartis Site, Parsonage Road, West Sussex, Horsham, RH12 5AA

- 3.7.15 The construction of 244 new homes with vehicular and pedestrian access from Parsonage road, public open space, landscaping, parking and associated works (reference DC/25/0415). Located c.1.8km north-west of the Application Site boundary.

Horsham Golf Park, Denne Park, Horsham, West Sussex, RH13 0AX

- 3.7.16 Outline planning application with all matters reserved save for access for the development of a Sports and Leisure Hub including the provision of communal facilities, nursery, Golf College, sports club house (containing Health & Fitness spa, changing facilities and food & beverage) and an educational facility for Warren Clark Golfing Dreams (Use Classes E, F1 & F2); a local centre containing a convenience store and co-working space (Use Classes E & F2); the provision of supporting landscaping, open space and related infrastructure; outdoor sports and leisure provision comprising Driving range, reprovision of golf (including supporting golf facilities) and hockey (including pitches and training area) (Use Class F2) and up to 800 dwellings (Use Class C3) (reference DC/23/1178). Located c.2.0km south-west of the Application Site boundary.

Mitigation

- 3.7.17 Where significant impacts or effects are predicted, the mitigation hierarchy is taken into account as recommended in the guidelines, which set out a sequential approach of avoiding impacts where possible, applying mitigation measures to minimise unavoidable impacts, and then compensating for any remaining impacts. Once avoidance and mitigation measures, and any necessary compensation measures, have been applied, and opportunities for enhancement are incorporated, residual impacts and effects are then identified. This approach is reflected across UK planning policy at a country level.
- 3.7.18 Where mitigation and / or compensation is proposed, this is proportionate to the geographical scale at which an effect is significant, *"for example, mitigation and compensation for effects on a species population significant at a county scale should ensure no net loss of the population at a county scale. The relative geographical scale at which the effect is significant will have a bearing on the required outcome which must be achieved"* (CIEEM, 2018, p41).
- 3.7.19 In addition to identifying mitigation measures, this section also addresses relevant legal requirements, for example in relation to protected or invasive non-native species.

4 Baseline Ecological Conditions

4.1 Introduction

- 4.1.1 This chapter summarises the baseline ecological conditions determined through the course of desk-based and field-based investigations described in Chapter 3. In particular, this section identifies and evaluates those ecological features that lie within the Site's potential Zol and are relevant in the context of the Proposed Development.
- 4.1.2 Full accounts of the results desk-based and field-based investigations are presented in the reports listed at 3.5.1. For the purpose of this chapter summary evaluations are included below.

4.2 Statutory and Non-statutory Site Designations

- 4.2.1 There are no internationally designated sites located within a 5km radius of the Application Site. There are three nationally designated sites within 2km.
- 4.2.2 In relation to bats, an extended desk study search zone of 10km was established, within which no SAC and eleven SSSI were identified. However, bat populations do not feature among the notified features of any of these sites.
- 4.2.3 There are four non-statutory wildlife site within 2km of the survey area.
- 4.2.4 Statutory and non-statutory sites are summarised in Table 4.1, with the locations of the statutory and non-statutory designated sites shown in Figure 4.1 and Figure 4.2 respectively. The locations of nearby HPI are shown in Figure 4.3.

Table 4.1: Nature conservation sites within the desk study search area

Site name	Location*	Description
National statutory sites		
High Weald Area of Outstanding Natural Beauty	c.8m east	This area comprises an extensive landscape of woodland and traditional mixed farming, which supports a well-connected green and blue infrastructure. The high proportion of semi-natural habitat forms a complex mosaic supporting a rich diversity of wildlife.
St. Leonard's Park Ponds SSSI	c.833m north-east	These species-rich ponds lie along a wooded stream, surrounded by fen and marginal vegetation. The fen surrounding the ponds includes the locally uncommon shoreweed <i>Littorella uniflora</i> and floating club-rush <i>Eleogiton fluitans</i> . The nationally rare yellow centaury <i>Cicendia filiformis</i> and a number of uncommon bryophytes are also known to occur on the site. The site supports a wide range of dragonflies including the uncommon variable damselfly <i>Coenagrion pulchellum</i> .
St. Leonard's Forest SSSI	c.1.22km east	This site includes the remnants of a more extensive deciduous forest on the Tunbridge Wells Sands. Much of the deciduous woodland is

Site name	Location*	Description
		dominated by pedunculate oak <i>Quercus robur</i> . In the more open areas of woodland, species characteristic of heathland occur. The damp areas adjacent to the gills have stands of alder <i>Alnus glutinosa</i> with willow. A number of rare bryophytes are also known to occur on the site. The woodlands support populations of the rare purple emperor butterfly <i>Apatura iris</i> and a diversity of woodland breeding birds including all three British woodpeckers, nightjar <i>Caprimulgus europaeus</i> , redstart <i>Phoenicurus phoenicurus</i> and wood warbler <i>Phylloscopus sibilatrix</i> .
Non-statutory sites		
Chesworth Farm LWS	c.426m west	This site comprises fields of semi-improved neutral grassland bound by a network of species rich hedgerows, with a complex of wetland habitats next to the River Arun. The site is important for birds with 96 species recorded between 2008-2018.
Leechpool & Owlbeech Woods LWS	c.999m north	This is a large area of woodland situated on the very edge of an urban area. Leechpool Wood consists of mainly oak <i>Quercus</i> sp. and beech <i>Fagus sylvatica</i> , and Owlbeech Wood is predominantly pine <i>Pinus</i> sp. plantation. A number of streams run through the woodlands and the site supports a variety of floral, bird, amphibian and reptile species.
Denne Road Cemetery LWS	c.1.31km west	A small urban Victorian cemetery with a mosaic of habitats including mixed woodland, grassland and scattered trees. The site includes records for a number of notable species from a range of taxonomic groups.
St. Leonard's Forest LWS	c.1.67km east	This site is a large area of coniferous and deciduous plantation, directly connected St. Leonard's Forest SSSI. Most of the site comprises coniferous plantations, which support wet and dry heath plant communities. There are also some areas of more semi-natural deciduous woodland similar to the SSSI. These areas support a variety of breeding birds, butterflies and dragonflies.

* Approximate distance and bearing from the Application Site.

4.3 Priority Habitats

- 4.3.1 Priority Habitats include those listed on local Biodiversity Action Plans and HPIs listed under section 41 of the NERC Act. SxBRC and a search of the MAGIC database returned the following data on priority and other habitats within the 2km desk study search area: Lowland Mixed Deciduous Woodland, Ancient Woodland, Ghyll Woodland, Traditional Orchard, Wood-pasture and Parkland, Lowland Meadow, Reedbed and open water. Areas of open water are included, which are assumed to qualify as Ponds, Eutrophic Standing Waters or Rivers HPI. The majority of the woodland along the northern boundary was mapped as Lowland Mixed Deciduous Woodland; see Figure 4.3. In addition to these, there were seven hedgerows within or adjacent to the survey area which qualified as Priority Habitat.

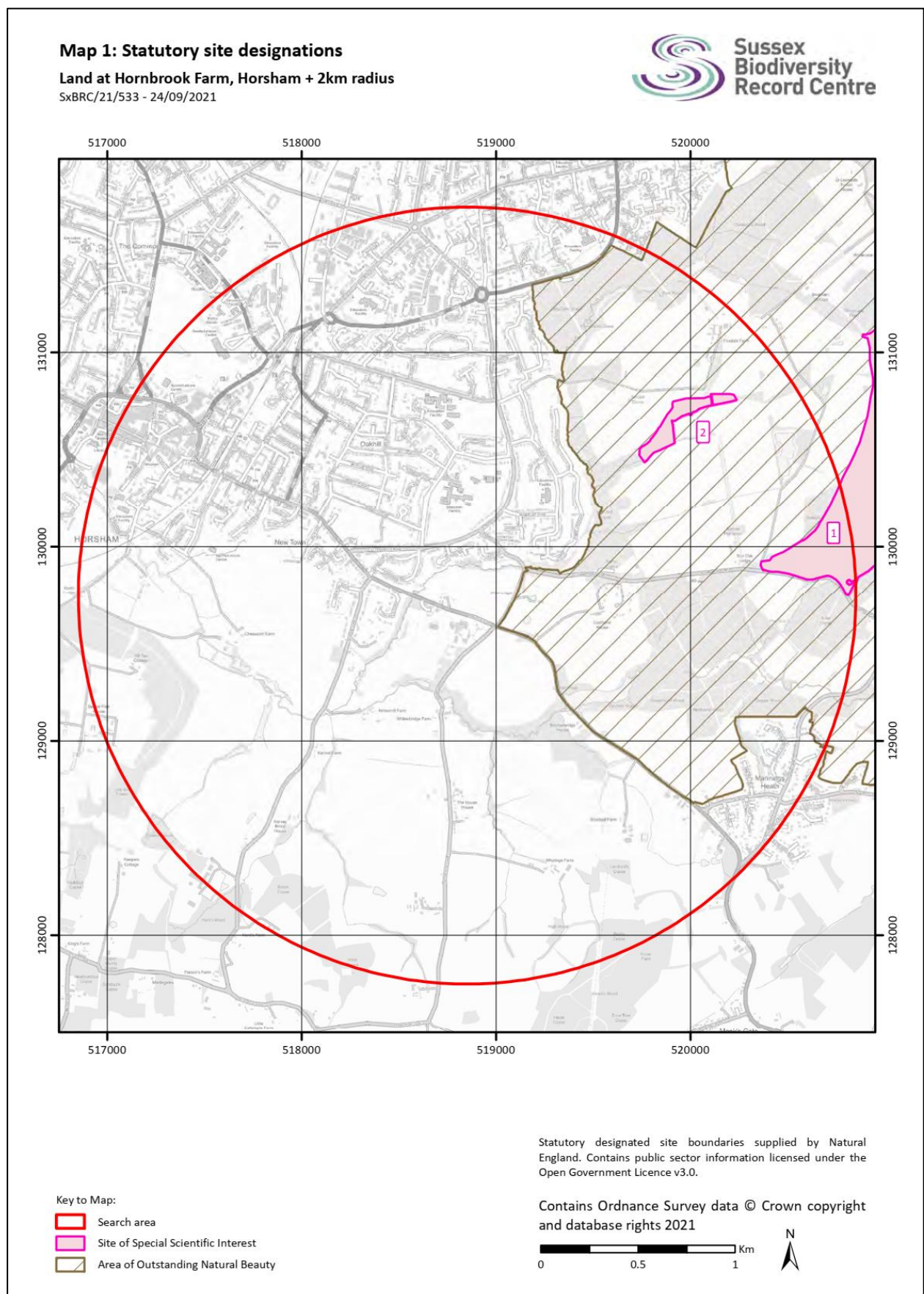


Figure 4.1: Statutory nature conservation sites within the desk study search area

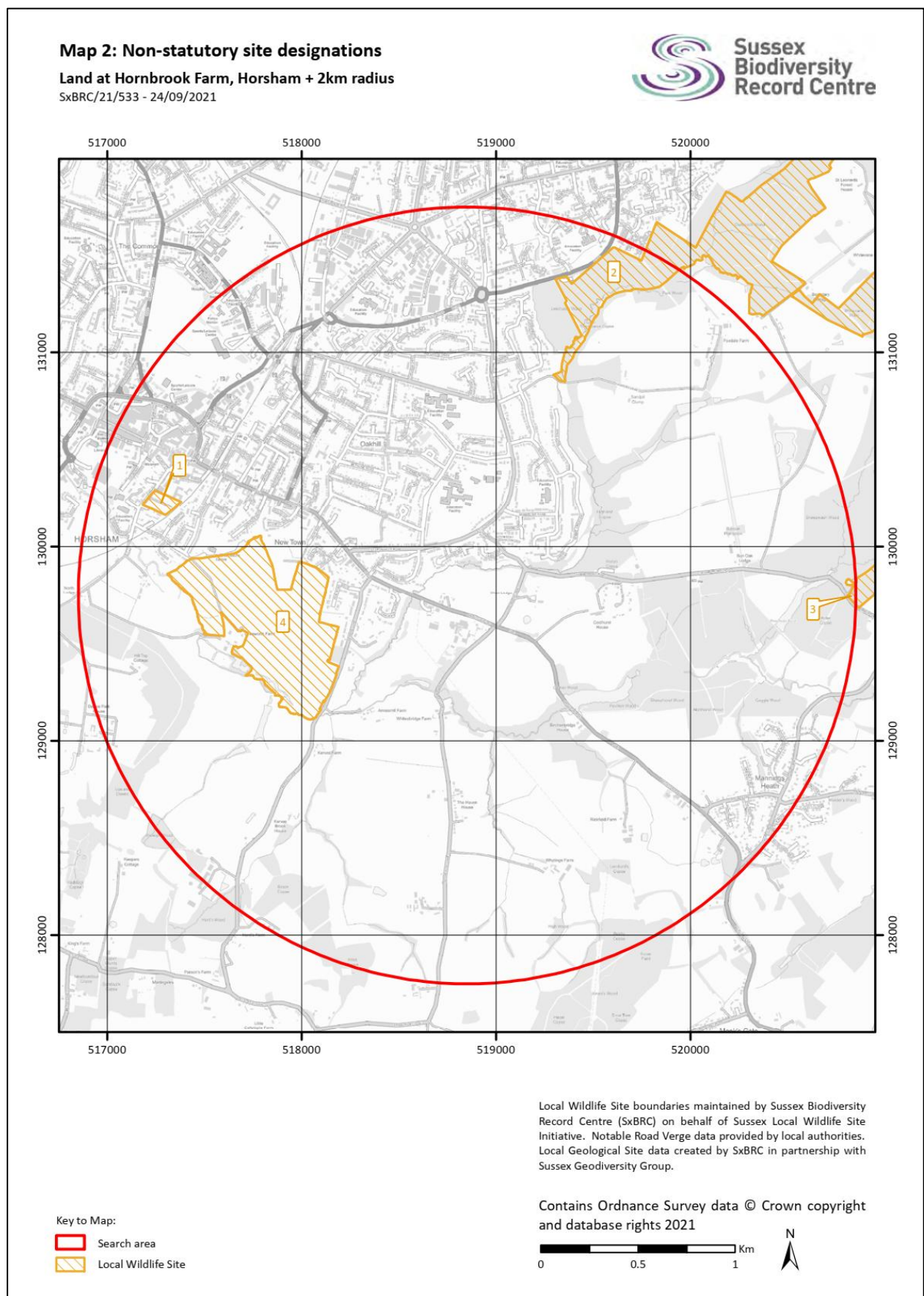


Figure 4.2: Non-statutory nature conservation sites within the desk study search area

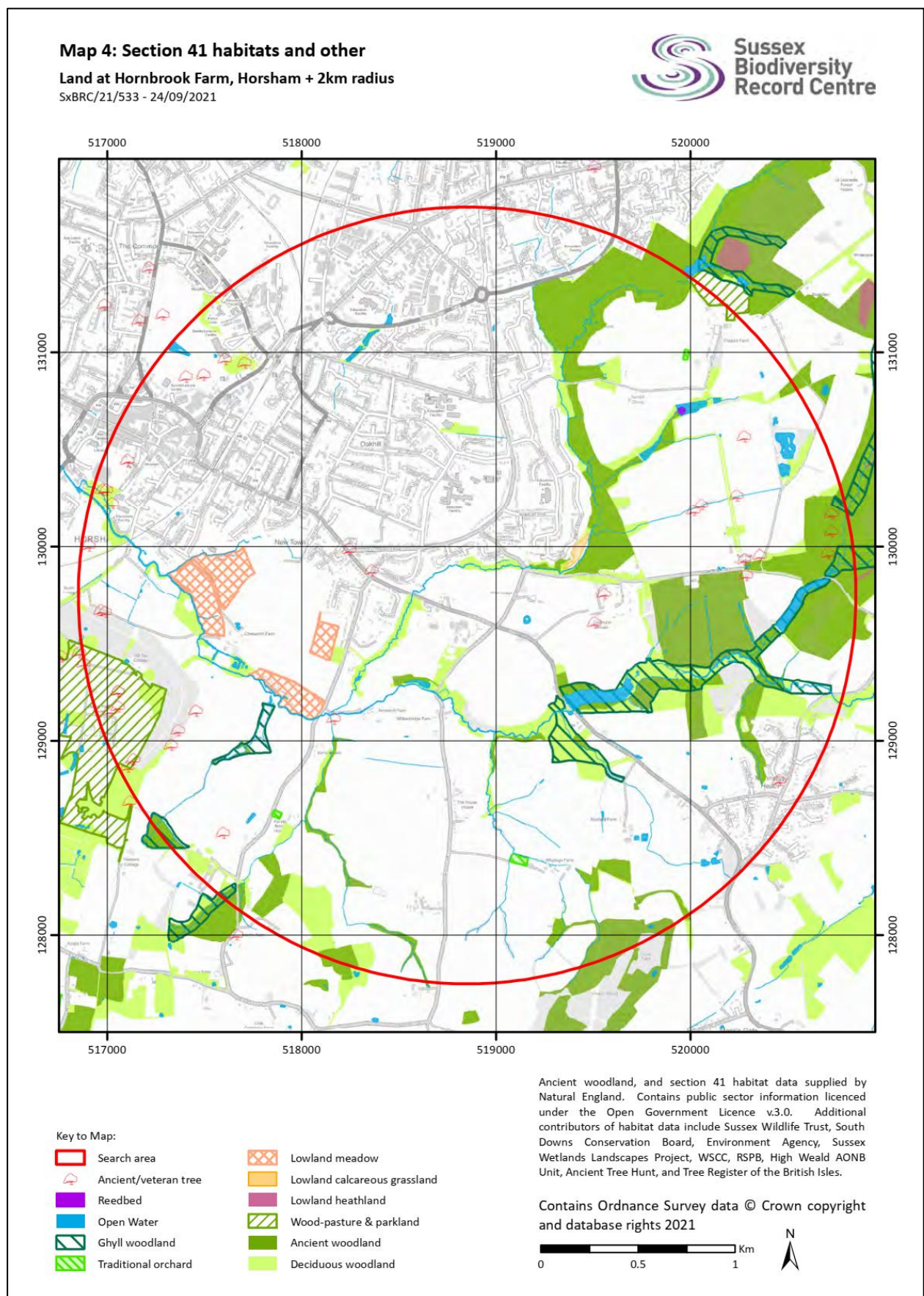


Figure 4.3: Priority habitats within the desk study search area

4.4 Protected, Rare and Notable Species

- 4.4.1 Biological records were obtained for the 2km search area and are summarised in the PEA (UEEC, 2026a).

4.5 Habitat and Vegetation Communities Evaluation Summary

- 4.5.1 A summary evaluation of the habitats and vegetation communities present within and adjacent to the Proposed Development Site is set out at Table 4.2.

Table 4.2: Summary of habitat evaluation

Habitat	Evaluation	Rationale
Running water	Local	This habitat is not considered to be a high-quality example, but connects Horn Brook with the wider riverine network (including the River Arun), which heightens its importance.
Hedgerows	Local	Whilst these habitats qualify as HPI, similar habitat of this quality is not uncommon in the Horsham District, which restricts their importance.
Broadleaved Woodland	Negligible	Whilst this habitat qualifies as an HPI, it is not considered to be a high-quality example and is set within a landscape which includes large areas of better-quality woodland.
Dense scrub	Negligible	Narrow strip of common and widespread habitat along the north-western boundary. Main value lies in the potential to support protected and notable species, including amphibians, reptiles and nesting birds.
Neutral semi-improved grassland	Negligible	Small section of non-priority grassland within the west of the Application Site. Main value lies in the potential to support protected and notable species, including amphibians and reptiles.
Improved grassland	Negligible	Section of non-priority grassland which dominated the eastern section of the Application Site. Main value lies in the potential to support protected and notable species, including amphibians and reptiles.
Poor semi-improved grassland	Negligible	Section of non-priority grassland within the central section of the Application Site. Main value lies in the potential to support protected and notable species, including amphibians and reptiles.
Bracken	Negligible	Common and widespread habitat with little value for wildlife individually.
Bracken / tall ruderal / scrub	Negligible	Common and widespread habitat. Main value lies in the potential to support protected and notable species, including nesting birds, amphibians and reptiles.
Tall ruderal	Negligible	Common and widespread habitat with little value for wildlife individually.

Habitat	Evaluation	Rationale
Scattered trees	Negligible	Common and widespread habitat. Main value lies in the potential to support protected and notable species, including nesting birds and bats.

4.6 Faunal and Botanical Evaluation Summary

4.6.1 A summary evaluation of the animal populations and invasive plant species present within and adjacent to the Proposed Development Site is set out at Table 4.3.

Table 4.3: Summary of faunal and botanical evaluation

Species	Importance	Rationale
Great crested newt	<u>Negligible</u>	The Application Site contained good quality terrestrial habitat for GCN in the form of poor semi-improved grassland, semi-improved neutral grassland, scrub, woodland and hedgerows. Additionally, six ponds were present within 500m of the Application Site and of these ponds, four were scoped out. Ponds P1 and P3 were maintained swimming pools within an installers showroom, while P6 was found to be a dry depression during the PEA (UEEC, 2026a). P4 was located c.400m south of the survey area and was surrounded by suitable habitat, making it unlikely that GCN would commute from it into the survey area. Therefore, only ponds P2 and P5 were subject to eDNA sampling and both returned negative results.
Breeding birds	<u>Local</u>	The Application Site was subject to breeding bird surveys which covered the whole site along with the woodland and scrub habitats associated with Horn Brook, which bordered the Application Site to the north. Of the 24 confirmed, probable and possible breeding species, two are included on the BoCC Red list and six on the Amber list. The survey results assessed the majority of the Application Site to be of <u>Negligible Importance</u> for breeding birds. However, the habitat surrounding Horn Brook along the northern boundary, was deemed to be of <u>Local Importance</u> .
Roosting bats (trees)	<u>Local-District</u> (precautionary)	The Application Site was subject to a ground level tree assessment which covered trees near to potential access routes and within the Proposed Development footprint. The survey results confirmed the Application Site contained a relatively high proportion of suitable trees, including six PRF-M, and it is probable that additional suitable trees were present within areas excluded from the ground level tree assessment, which included the northern and western boundary habitats surrounding Horn Brook.
Foraging and commuting bats	<u>Local</u>	The Application Site was dominated by a high proportion of common and widespread bats (common pipistrelle <i>Pipistrellus pipistrellus</i> and soprano pipistrelle <i>Pipistrellus pygmaeus</i>) but also provided foraging and / or commuting habitat for less common species, most notably noctule <i>Nyctalus noctula</i> and <i>Myotis</i> species. Rarer bats, serotine <i>Eptesicus serotinus</i> , Leisler's bat <i>Nyctalus</i>

Species	Importance	Rationale
		<i>leisleri</i> and <i>barbastelle</i> <i>Barbastella barbastellus</i> , were also recorded across the monitoring period but at low frequencies. Habitats which may have formed important navigation routes and foraging features for bats included the northern and western boundary woodland, along with the eastern and southern boundary hedgerows. Activity levels were higher along the northern and eastern boundaries, with lower levels of activity recorded within the central band of the Application Site, along with the southern and western boundaries. As bat activity was dominated by widespread and common species, it was deemed appropriate to assess the importance of the assemblage as being of <u>Local Importance</u> .
Hazel dormouse	<u>Negligible</u>	Suitable habitat for hazel dormouse was present in the form of woodland and hedgerow, and the Application Site was well connected to suitable dormouse habitat within the local landscape, including woodland blocks to the north-east and east. Despite the presence of suitable habitat and records of dormouse within the desk study data search, the nest tube surveys conducted during 2023 recorded no evidence of hazel dormouse within the Application Site.
Otter	<u>Negligible</u>	Two incidental recordings of otter were noted during the [REDACTED] camera trap monitoring surveys. However, no further evidence of otter was recorded and no otter holts were found.
Water vole	<u>Negligible</u>	Although two burrows that may have belonged to water vole were recorded, no further evidence of water vole was found associated with Horn Brook.
Reptiles	<u>Negligible</u>	Suitable reptile habitat was found within the areas of poor semi-improved grassland, semi-improved neutral grassland, woodland, scrub and hedgerows. The artificial refuge surveys conducted during 2024 recorded a low population of common lizard.
Invasive non-native species	N/A	Himalayan balsam <i>Impatiens glandulifera</i> , rhododendron <i>Rhododendron ponticum</i> and American skunk-cabbage <i>Lysichiton americanus</i> were recorded within the northern boundary woodland and habitat associated with Horn Brook. Both Himalayan balsam and rhododendron are listed on Schedule 9 of the WCA.

4.7 Baseline Evolution in the absence of Proposed Development

- 4.7.1 Site preparation works will commence in early 2028. It is considered likely that the majority of habitats present at the Application Site will be in a similar condition to as they were in 2025, albeit that minor changes may have occurred such as storm damage to trees. Similarly it is considered likely that, for the majority of species present at the Application Site, their abundance and distribution in relation to the Application Site will be in a similar condition when construction starts, albeit that minor changes may have occurred in highly mobile species such as bats and birds.

4.8 Important Ecological Features

4.8.1 As stated in 3.7.1, impacts are only assessed in detail for IEFs potentially vulnerable to effects arising from the development that would be considered significant in EcIA terms. Consequently, impacts have only been assessed in detail for those features that are of at least Local importance or are subject to legal protection.

4.8.2 Therefore, the impact assessment considers the following features:

- ▶ Running Water (Local)
- ▶ Hedgerows HPI (Local);
- ▶ Nesting birds (Local & Legal protection);
- ▶ Roosting bats – trees (Local-District & Legal protection);
- ▶ Foraging and commuting bats (Local);
- ▶ Otter (Legal protection)
- ▶ Water vole (Legal protection)
- ▶ Reptiles (Legal protection).

5 Proposed Development

5.1 Introduction

- 5.1.1 This section summarises the key features that have been incorporated into the Site layout, design and construction in order to avoid or reduce impacts on features of nature conservation interest.

5.2 Embedded Mitigation

- 5.2.1 The Biodiversity Mitigation and Enhancement Plan (BMEP) will detail procedures for the avoidance of various ecological impacts during the construction phase of the Proposed Development. This will include measures to: protect retained vegetation such as woodland, hedgerows and trees; avoid impacts on birds, nests or eggs during vegetation clearance; and protect Horn Brook for the duration of the construction works associated with the Proposed Development. Where the potential effects are mitigated by adopting such measures, no further detailed consideration is provided in chapter 6.

Hedgerow / Tree Protection

- 5.2.2 British Standard BS 5837:2012 will be followed at all times during construction when working in close proximity to trees or shrubs which are to be retained. According to BS 5837:2012 the root protection area is 12x diameter of the trunk (diameter is measured around the trunk at a height of 1.5m above ground level), which will constitute the construction exclusion zone. The distance is measured from the centre of the trunk to the nearest part of any excavation or other work. Works will be undertaken in accordance with the approved *Arboricultural Impact Assessment* for the Application Site (UEEC, 2026f).

Running water (Horn Brook)

- 5.2.3 Horn Brook was located off-site of the northern boundary of the Application Site and was associated with woodland used by a wide range of protected and notable species. Protected species using these habitats included nesting birds, roosting bats (probable), foraging and commuting bats, otter and water vole (possible). As such, Horn Brook will be buffered by at least 10m from its southern bank. The exception to this is a small extension of land which abuts the southern edge of Horn Brook. Measures taken to reduce the risks to otter / water vole for the duration of the works here, are noted in Table 6.2.
- 5.2.4 The buffer zone will help to protect Horn Brook, the associated woodland surrounding the brook and the protected species listed in 5.2.3 during the construction and operational phase of the Proposed Development. The buffer will reduce the level of disturbance from noise, light and dust pollution, hydrological changes, impacts to tree root systems, fly-tipping, invasive species and increased public access.

Nesting Birds

- 5.2.5 Removal of nesting bird habitat will be undertaken outside of the bird nesting season, which runs from 1 March to 31 August. It will therefore be carried out between September and February, but will be planned and implemented in accordance with the findings of the further ecological surveys, as other protected species may still be present outside of the bird breeding season. Any construction works undertaken within the bird breeding season where suitable bird breeding habitat exists will require a site check for nesting birds by a suitably qualified ecologist. This will take place no more than two days prior to works commencing. This is to ensure that no disturbance to active bird nests occurs. If a nest is found it must be cordoned off and works adjacent to the nest must be delayed until such time that the chicks have fledged from the nest. This will be supervised by a suitably qualified ecologist.
- 5.2.6 The majority of the survey area was assessed as being of Negligible Importance for breeding birds, with the habitat associated with Horn Brook, including the northern woodland, being assessed as being of Local Importance. However, the measures in relation to buffering the woodland and Horn Brook from construction activities (see 5.2.3 and 5.2.4), will also act to protect the breeding bird populations in this location.

Invasive non-native species

- 5.2.7 A suitably qualified contractor will be appointed to eradicate the Himalayan balsam and American skunk-cabbage, present within the northern boundary habitats, prior to any works commencing along within this part of the Application Site. A method statement will be prepared and included within the Construction Environmental Management Plan (CEMP) to ensure adequate control measures are adopted during construction to prevent these species spreading into the developable area or into neighbouring properties.
- 5.2.8 Rhododendron was present within the eastern section of the northern boundary woodland. This species is highly invasive and it is inadvisable to have it present in woodland. A method statement will be prepared to ensure adequate control measures are adopted to prevent it spreading within the woodland on and beyond the site.

Ecological enhancement

- 5.2.9 The BMEP will also set out the features proposed to enhance the value of the site for wildlife following completion of construction.
- 5.2.10 A Landscape and Ecological Management Plan (LEMP) will ensure that mitigation proposals and the habitats within them, such as woodland, hedgerows, deadwood habitats, grassland, scrub and ponds are managed and maintained in the long-term. The LEMP will outline the aims and objectives, management principles, and maintenance operations to ensure that the objectives of the ecological mitigation strategy can be met.

6 Impact Assessment

6.1 Introduction

- 6.1.1 This section identifies the potential impacts of the Proposed Development before making an assessment of significant effects on each IEF, taking account of embedded mitigation. It goes on to consider cumulative effects before determining residual impact.

6.2 Potential Effects

- 6.2.1 Whilst exact details of the construction methods to be used cannot be determined with certainty at this time, a number of assumptions and parameters have been fixed for the purposes of this assessment and are described in Chapter 5. Potentially significant effects on important ecology and nature conservation features resulting from the construction and operation phases of the Proposed Development are listed in Table 6.1.

Table 6.1: Potential significant effects resulting from construction and operation phases of Proposed Development

Effect	Impact causes/mechanisms
Construction	
IEFs affected *	Hedgerows HPI; Roosting bats – trees; Foraging and commuting bats; Otter; Water vole; and Reptiles
Habitat loss / damage	Direct clearance, soil stripping or digging necessitating the felling of trees, removal or disturbance of vegetation by materials storage / stockpiling etc.
Habitat degradation: pollution	Pollution by artificial light, dust, emissions, fuels, lubricants, hydraulic fluid or silt resulting in toxic effects to plants / habitat composition, or damage to soils or vegetation by soil compaction (resulting in changes in flora).
Habitat fragmentation	Severance of habitat corridors or isolation of patches of habitats (e.g. by severance of hedgerows or the removal/felling of woodland).
Killing / injury of animals	Digging, vegetation removal, movement of vehicles and entrapment of animals in trenches, pits or pipes.
Displacement of animals	Visual, noise or vibration-related disturbance from vehicles or digging. Habitat degradation (see above) may also displace resident animals.
Operation	
IEFs affected *	Roosting bats – trees; Foraging and commuting bats.
Habitat degradation	Increased recreational pressure (additional foot-fall). Introduction of invasive non-native species.
Reduced animal populations	Increased recreational pressure and disturbance.

Effect	Impact causes/mechanisms
Displacement of animals	Visual, noise or vibration-related disturbance from vehicles/heavy plant, digging or piling. Habitat degradation (see above) may also displace resident animals.

* The following IEFs are considered adequately dealt with by embedded mitigation:

- ▶ Running water
- ▶ Nesting birds;
- ▶ Otter (operation only); and
- ▶ Water vole (operation only).

6.3 Effects during the Construction Phase

6.3.1 In Table 6.2 likely significant effects resulting from construction are detailed for each of the IEF identified previously in section 4.8 and the impacts are characterised, where appropriate, in terms of their extent, magnitude, duration, frequency, timing and reversibility. This evaluation takes into account embedded mitigation and the proposed site layout, which are referred to in chapter 5. All necessary additional mitigation is also described.

Table 6.2: Likely significant effects resulting from construction, considered for each Important Ecological Feature

IEF: Hedgerows HPI
Potential effect:
Habitat loss / damage Habitat degradation
Proposed Development activity:
The construction phase will focus on site preparation works, including creation of new access routes through existing hedgerow. These include a new vehicle / pedestrian access routes through hedgerows H3 and H4, equating to a loss of c.19m, with further losses at the centre of the Proposed Development of H5, H5a and H6 to facilitate the residential / landscaping layout resulting in losses of c.244m respectively.
Characterisation of impact, taking account of embedded mitigation:
Removal of sections of H3, H5 and H6 during the construction phase (short-term) represents a low magnitude negative impact resulting in a permanent reduction in the available extent of Hedgerows HPI. The impact is irreversible and is of significance at the Local level. Potential damage to and degradation as a result of mechanical damage to tree and shrub root systems, pollution, dust and soil compaction, will be avoided through implementation of root protection areas (see section 5.2.2).
Scale of effect:
Minor significance negative effect at the Local level.
Cumulative effects:
None – no other identified approved or potential developments are expected to significantly affect lengths of Hedgerows HPI, without providing sufficient mitigation.

IEF: Hedgerows HPI
<i>Additional mitigation required, including means of securing implementation:</i>
Approximately 882m of native hedgerow will be created through the Proposed Development as part of the landscaping plans. The creation of new hedgerows will mitigate the combined loss of hedgerow length at H3, H4, H5, H5a and H6. This mitigation measure will form part of the LEMP and can be secured via an appropriately worded planning condition.
<i>Significance of residual effect:</i>
No significant effect.
IEF: Roosting bats (trees)
<i>Potential effect:</i>
Habitat loss / damage Killing / injury of animals Displacement of animals
<i>Proposed Development activity:</i>
The construction phase will focus on site preparation works, including working in close proximity to trees suitable for roosting bats.
<i>Characterisation of impact, taking account of embedded mitigation:</i>
It is anticipated that all of the trees suitable for roosting bats, including the six PRF-M trees that were identified during the Ground Level Tree Assessment (UEEC, 2026c), will be retained as a result of the Proposed Development based on the Tree Retention and Removals Plan within the Arboricultural Impact Assessment (UEEC, 2026f). There is potential for bats roosting within trees which were not surveyed to be displaced by increased lighting during the construction phase.
<i>Scale of effect:</i>
No significant effect on habitat loss or killing / injury of animals. The impact on roosting bats within retained trees is reversible and temporary, likely to be no more than a Minor negative effect at the Local-District level.

IEF: Roosting bats (trees)
Cumulative effects:
None – no roosts were identified at other approved or potential developments, and unknown populations of roosting bats at those sites are unlikely to be supported by the roosting habitat affected at the Site. Any suitable trees that were not surveyed as part of the relevant nearby developments will be retained and protected, including from artificial light. The nearest recorded roosts sites were located greater than 200m from the Application Site and are therefore unlikely to be impacted by the Proposed Development.
Additional mitigation required, including means of securing implementation:
The use of external lighting will be avoided or reduced to the minimum required for its intended purpose, during the operation phase. Where external lighting is to be provided, it should be low-level, directional lighting with minimal spill and glare. Lighting will not be directed towards the retained northern boundary woodland, hedgerow, or individual trees. Measures relating to sensitive lighting will form part of a BMEP and can be secured via an appropriately worded planning condition.
Significance of residual effect:
No significant effect
IEF: Foraging and commuting bats
Potential effect:
Habitat degradation Habitat fragmentation Displacement of animals
Proposed Development activity:
The construction phase will focus on site preparation works, including the removal of c.2.08ha of modified grassland, c.1.19ha of other neutral grassland, 0.06ha of bramble scrub and 263m of hedgerow.
Characterisation of impact, taking account of embedded mitigation:
Higher quality habitat was concentrated around the boundaries, with central field areas dominated by improved and semi-improved grassland that lacked cover features or the floral diversity to provide a range of invertebrates for foraging. Bat activity levels were found to be highest along the northern boundary woodland and eastern boundary hedgerow (H4), with moderate levels recorded along the southern boundary hedgerows (H1, H2 and H3) and western boundary scrub

IEF: Foraging and commuting bats

associated with Horn Brook. These boundary habitats provided important foraging habitat within the survey area, while also likely providing important commuting habitat to the wider landscape, including to off-site woodland to the north-east.

The composition of bat species was dominated by common pipistrelle and soprano pipistrelle, but the survey area also provided regular foraging and / or commuting habitat for less common species, most notably *Myotis spp.* and noctule. Rarer bats, serotine, Leisler's bat and barbastelle, were also recorded across the monitoring period but at low frequencies.

The northern boundary woodland and eastern boundary H4 will be retained and protected during the construction phase. The northern sections of H5 and H6 will be removed for the implementation of pedestrian access routes, while short gaps will be created within the central parts of hedgerows H3 and H5a to provide new vehicle accesses, all of which may result in minor and temporary displacement of bats from this area. The majority of habitat losses will result from the removal of improved grassland, poor semi-improved grassland and neutral semi-improved grassland. Very low levels of activity were recorded within these habitats and their loss is likely to represent negligible negative impacts at the Local level.

The majority of boundary habitats will be retained and protected for the duration of development as part of the embedded mitigation which will provide good continuity of habitat resource availability and connectivity for foraging and commuting bats.

Potential damage to and degradation as a result of mechanical damage to tree and shrub root systems, pollution, dust and soil compaction, will be avoided through implementation of RPAs (section 5.2.2).

There is also potential for bats using the Application Site as a foraging and commuting resource to be displaced by increased lighting during the construction phase which would represent a minor temporary negative impact at the Local level.

Scale of effect:

Minor significant effect on habitat fragmentation at the Local Level

The impacts of habitat loss and displacement of animals is permanent, likely to be a Minor negative effect at the Local level.

Cumulative effects:

None – no other identified approved or potential developments are expected to affect significant populations of foraging and commuting bats, in combination with effects at the Application Site. Each relevant nearby site recorded a similar level of activity and species composition to the present Application Site. Measures have been incorporated into these developments to protect valuable connecting habitat across the landscape.

Additional mitigation required, including means of securing implementation:

Measures proposed through the landscape strategy will contribute towards mitigating the negative effect of development on foraging and commuting bats. The following measures will be implemented as part of the design for the development for the Site:

IEF: Foraging and commuting bats

- ▶ Approximately 2.30ha of other neutral grassland, 0.93ha of mixed scrub and 0.74ha of modified grassland will be created across the Proposed Development to provide additional foraging habitat for affected species. The creation of other neutral grassland will particularly improve the foraging habitat adjacent to the northern and western boundaries, which were the highest quality for bats.
- ▶ Approximately 882m native hedgerow will be created, along with the planting of 87 urban trees through the Proposed Development to provide additional foraging features and commuting routes through the Site.

The mitigation strategy will form part of the LEMP and can be secured via an appropriately worded planning condition.

The measures relating to sensitive lighting will form part of the BMEP and can be secured via an appropriately worded planning condition.

Significance of residual effect:

No significant effect

IEF: Otter

Potential effect:

Habitat loss / damage
Habitat fragmentation
Killing / injury of animals
Displacement of animals

Proposed Development activity:

The construction phase will focus on site preparation works, including the removal of 0.06ha of bramble scrub adjacent to Horn Brook, which is suitable habitat for otter.

Characterisation of impact, taking account of embedded mitigation:

No signs of otter or their holts and resting places were recorded during the otter surveys in 2025 and it is unlikely that they permanently reside along Horn Brook. However, two recordings of otter were noted during the [REDACTED] camera trap monitoring surveys (UEEC, 2026b), suggesting that otter do commute along the brook. Given the suitable riparian habitat within the northern boundary woodland and Horn Brook itself, there remains a low risk that otter may be present onsite, at least intermittently.

IEF: Otter
Scale of effect:
Given that otter are unlikely to breed or actively reside within the Application Site or along Horn Brook the impacts of habitat loss are Negligible. The risk of killing / injury would be temporary and limited to the construction period.
Cumulative effects:
None – no approved or potential developments are expected to significantly impact otter populations and suitable otter habitat including Horn Brook and woodland will be mostly retained and protected.
Additional mitigation required, including means of securing implementation:
An update inspection of the small section of the Application Site boundary which abuts Horn Brook, by a suitably qualified ecologist, is recommended prior to the commencement of works in this area. This will include a thorough check of the vegetation, to ensure no otter, their holts or potential resting positions are present within the works area. If a holt is found then works must not commence and a European Protected Species Mitigation Licence application may be required. Impacts elsewhere along Horn Brook will be avoided by the embedded mitigation mentioned in section 5.2.3.
Significance of residual effect:
No significant effect

IEF: Water vole
Potential effect:
Habitat loss / damage Habitat fragmentation Killing / injury of animals Displacement of animals
Proposed Development activity:
The construction phase will focus on site preparation works, including the removal of 0.06ha of mixed scrub adjacent to Horn Brook, which is suitable habitat for water vole.

IEF: Water vole

Characterisation of impact, taking account of embedded mitigation:

No water vole were recorded within the survey area during the 2025 surveys. However, two burrows which could not be conclusively ruled out from being water vole were found within the western portion of Horn Brook. Due to the presence of well-connected favourable habitat within the surrounding area and previous records of water vole within the desk search data, a low risk remains that water vole could be present within Horn Brook and the northern boundary of the Application Site.

Scale of effect:

Given that no water vole were recorded within the Application Site the impacts of habitat loss are Negligible.
The risk of killing / injury would be temporary and limited to the construction period.

Cumulative effects:

None – no approved or potential developments are expected to significantly impact water vole populations and suitable water vole habitat including woodland and Horn Brook will be mostly retained and protected.

Additional mitigation required, including means of securing implementation:

An update inspection of the small section of the Application Site boundary which abuts Horn Brook and is c.38m north-east of where the potential water vole burrows were found, is recommended prior to commencement. This will include a thorough check of the vegetation, to ensure no water vole or their burrows are present within the works area. If water vole or their burrows are found, then a licence to displace water vole may be required. Impacts elsewhere along Horn Brook will be avoided by the embedded mitigation mentioned in section 5.2.3

Significance of residual effect:

No significant effect

IEF: Reptiles

Potential effect:

Habitat loss / damage
Killing / injury of animals
Displacement of animals

IEF: Reptiles
Proposed Development activity:
The construction phase will focus on site preparation works, including removal c.2.08ha of modified grassland, c.1.19ha of other neutral grassland, 0.06ha of bramble scrub and 263m of hedgerow.
Characterisation of impact, taking account of embedded mitigation:
The Proposed Development will require removal of habitat considered suitable for reptiles (poor semi-improved grassland, neutral semi-improved grassland and hedgerow). A low population of common lizard (peak count of one adult) were present within the survey area during the 2024 survey season. Of the two common lizard records, one was located within the south-eastern corner of the eastern field and the other was located within the western portion of the western field. The loss of relatively large areas of grassland along with smaller areas of hedgerow will permanently reduce the available extent of habitat during the short term. The loss of habitat is permanent but is of negligible significance given the low populations of reptiles recorded. Potential damage to and degradation as a result of mechanical damage to tree and shrub root systems, will be avoided through implementation of RPAs and pollution prevention (sections 5.2.2). Reptiles present within the Site will be at risk of killing and injury during site clearance and construction works, which would constitute an offence under the WCA.
Scale of effect:
Negligible negative effect, permanent. The risk of killing / injury would be temporary and limited to the construction period.
Cumulative effects:
None – no other approved or potential developments are expected to significantly impact reptile populations. Effective mitigation measures are proposed where necessary to prevent impacts upon reptiles and their habitat. Reptiles have been recorded at two nearby developments. However, both of these sites are not well connected to the present Application Site and are at least 1.8km away. These include DC /25/0415 Former Novartis Site and DC/23/1178 Horsham Golf Park.
Additional mitigation required, including means of securing implementation:
The population of common lizard in the survey area is at risk of killing or injury during construction. A translocation of reptiles from the construction zone to a suitable receptor site will be carried out prior to site preparation and commencement of works, to avoid the risk of killing / injury. The translocation will be implemented in accordance with a Method Statement which has been agreed with the Local Planning Authority and is likely to include the following: ▶ Appointment of Ecological Clerk of Works: An Ecological Clerk of Works (ECoW) will be appointed to oversee operations which could negatively affect reptiles and other ecological features of value.

IEF: Reptiles

- ▶ **Selection and enhancement of a receptor site:** It is anticipated that an on-site receptor area can be created within the south-eastern part of the survey area. Habitat management will be required prior to the commencement of the translocation to enhance the receptor area's capacity to support a population of reptiles. This may include creation of hibernacula.
- ▶ **Erection of reptile exclusion fencing:** The translocation area will be fenced-off from surrounding habitats using reptile exclusion fencing. This will be left in-situ following the completion of the translocation, to ensure that reptiles do not re-colonise the site during construction.
- ▶ **Capture and translocation:** Capture of reptiles will be undertaken by hand, facilitated by the laying of artificial refuges to help concentrate capture effort. A capture period of at least 30 and up to 60 days is likely to be required.
- ▶ **Habitat manipulation:** Once the translocation is underway, if captures begin being to diminish it is often helpful to undertake habitat manipulation to reduce the amount of suitable vegetation cover and render any remaining reptiles easier to catch. This will include strimming the grassland and brush-cutting bramble and scrub into progressively smaller patches within the construction zone.
- ▶ **Destructive search:** Following completion of the translocation, sites of potential refuge/hibernation (e.g. log / rubble piles or compost heaps) will be deconstructed using hand tools. Remaining areas of vegetation will be progressively reduced in height. Finally, the top soil will be carefully and systematically excavated and removed from site. Clearance will be carried out slowly and methodically under the direction of the ECoW.
- ▶ **Toolbox talks:** All site operatives will receive a briefing from the ECoW to explain the legal protection for reptiles, the methods to be followed, tips on identifying reptiles, and the procedure to be followed should a reptile be found at any stage during the works.
- ▶ **Timing of the works:** The translocation, destructive search and site clearance works will be programmed to take place during the active season for reptiles, broadly late March to October.
- ▶ **Nesting birds:** As a result of the precautionary timing outlined above, it is possible that the work will be carried out during the nesting bird season which runs from early March to late September. If vegetation clearance is required during the nesting season, a survey for active bird nests will be carried out by the ECoW immediately prior to the works. If an active nest is found, the nest must be cordoned off and works adjacent to this nest must be delayed until such time that the chicks have fledged.
- ▶ **Procedure if reptiles are encountered:** If reptiles are found within the construction zone during the works, site operatives will be advised to cease activity in its vicinity while advice from the ECoW is sought. The ECoW will then assess the most appropriate course of action which may include removing the individual(s) from the site and moving it to an area of suitable habitat outside of the construction zone.

Significance of residual effect:

No significant effect

6.4 Effects during the Operation Phase

6.4.1 In Table 6.3 likely significant effects resulting from operation are detailed for each of the IEFs identified previously in section 4.8 and the impacts are characterised, where appropriate, in terms of their extent, magnitude, duration, frequency, timing and reversibility. This evaluation takes into account embedded mitigation (as described at section 5.2), which is also referred to in Table 6.3. All necessary additional mitigation is also described.

Table 6.3: Likely significant effects resulting from operation, considered for each Important Ecological Feature

IEF: Roosting bats (trees)
Potential effect:
Displacement of animals
Proposed Development activity:
Additional street lighting will be included within proposals for the Site for access and health and safety provision.
Characterisation of impact, taking account of embedded mitigation:
The majority of trees on the Application Site will be retained, including all trees suitable for roosting bats (UEEC, 2026c). However, there is potential for bats roosting within these trees to be displaced by increased lighting during the operational phase.
Scale of effect:
The impact on roosting bats within retained trees is permanent, but likely to be no more than a Minor negative effect at the Local-District level.
Cumulative effects:
None – no roosts were identified at other approved or potential developments, and unknown populations of roosting bats at those sites are unlikely to be supported by the roosting habitat affected at the Site. The nearest recorded roosts sites were located greater than 200m from the Application Site and are therefore unlikely to be impacted by the Proposed Development.
Additional mitigation required, including means of securing implementation:
The use of external lighting will be avoided or reduced to the minimum required for its intended purpose, during the operation phase. Where external lighting is to be provided, it should be low-level, directional lighting with minimal spill and glare. Lighting will not be directed towards the retained northern boundary woodland, hedgerow, or individual trees. Measures relating to sensitive lighting will form part of a BMEP and can be secured via an appropriately worded planning condition.

IEF: Roosting bats (trees)
Significance of residual effect:
No significant effect
IEF: Foraging and commuting bats
Potential effect:
Displacement of animals
Proposed Development activity:
Additional street / footpath lighting will be included within proposals for the Site for access and health and safety provision.
Characterisation of impact, taking account of embedded mitigation:
Suitable habitats for foraging and commuting bats will be retained and created on site post-construction of the development, including broadleaved woodland, other neutral grassland, mixed scrub, hedgerows and individual trees. There is potential that bats using these habitat features may be displaced by increased lighting during the operational phase. Bat activity was identified on all site boundaries, with particularly high activity recorded along the northern boundary woodland and eastern boundary H4. These areas likely constitute key commuting routes or foraging resources, particularly to woodland blocks to the east. According to Stone (2013), the impact of light on foraging and commuting bats is classified as low for serotine, barbastelle and individuals of the genera <i>Nyctalus</i> and <i>Pipistrellus</i> – which comprises the majority of all bats recorded during passive monitoring at the Application Site. These species are unlikely to be significantly affected by proposals for the site. Without mitigation, use of the Application Site by light intolerant species, including individuals of the genera <i>Myotis</i> and brown long-eared may be reduced by the proposals.
Scale of effect:
The impact on foraging and commuting bats using retained and newly created habitats is permanent, but likely to be no more than a Minor negative effect at the Local level.
Cumulative effects:
None – no other identified approved or potential developments are expected to significantly affect foraging and commuting bats using the Site. All relevant sites will incorporate a sensitive lighting plan that will avoid impacts of the important foraging and commuting routes.

IEF: Foraging and commuting bats

Additional mitigation required, including means of securing implementation:

The use of external lighting has been reduced to the minimum required for its intended purpose, during the operation phase. Where external lighting is to be provided, it will be low-level, directional lighting with minimal spill and glare. Lighting will not be directed towards the areas of retained hedgerows or woodland, nor newly created areas of other neutral grassland, mixed scrub and hedgerows.

The mitigation strategy will form part of the BMEP and can be secured via an appropriately worded planning condition.

Significance of residual effect:

No significant effect

6.5 Summary of Residual Effects

- 6.5.1 Table 6.4 outlines the residual effects following the implementation of additional mitigation measures not already embedded in the design of the Proposed Development and identifies whether these are significant in relation to national and local planning policy.
- 6.5.2 Within this EcIA, significant residual negative effects are those at the level of moderate, major or substantial; minor and negligible negative effects are not considered to be significant. No residual effects that are significant in terms of national and local planning policy are anticipated to occur as a result of the Proposed Development.

Table 6.4: Residual effects

Feature	Significant residual effects	
	Construction phase	Operation
Hedgerows HPI	No significant effect	N/A
Roosting bats – trees	No significant effect	No significant effect
Foraging and commuting bats	No significant effect	No significant effect
Otter	No significant effect	N/A
Water vole	No significant effect	N/A
Reptiles	No significant effect	N/A

6.6 Monitoring

- 6.6.1 No significant residual effects were identified, and no specific monitoring is required.
- 6.6.2 Nevertheless, monitoring surveys of the extent, condition and richness of the newly created habitats will be important to enable adjustments to be made to recommended habitat management measures to maximise their effectiveness. Monitoring will be carried out during the first growing season following seed sowing, and subsequently in accordance with the provisions of the LEMP, to be secured via planning condition.

6.7 Enhancements

- 6.7.1 Recommendations for additional enhancements are provided in Table 5.4 of the PEA (UEEC, 2026a) and will be incorporated as part of the Proposed Development.

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