



Bat Emergence Survey Report

St Johns Farm, Trout lane, West Sussex,
RH13 0JN

December 2025



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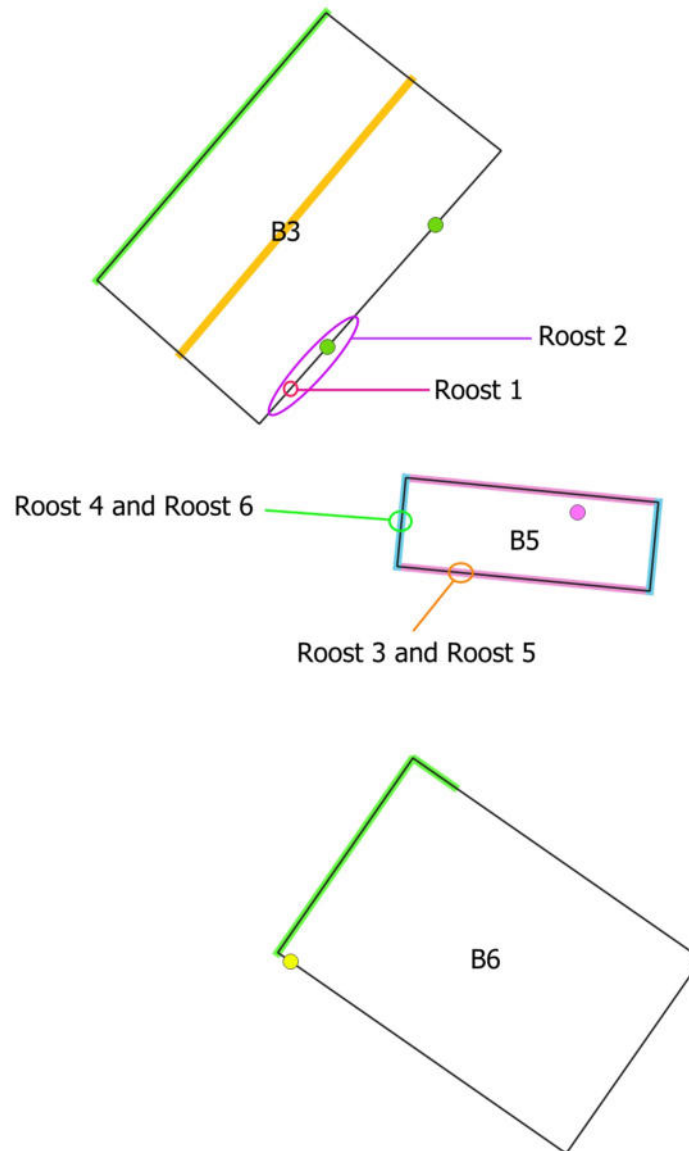
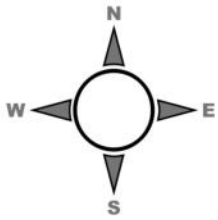
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Legend

- Building layout
- Potential roosting features and access/ egress points
 - Gaps around timber frame
 - Gaps under eaves
 - Gaps under metal roof sheeting
 - Gaps under wooden cladding
 - Gaps under roof tiles
 - Gaps above metal doors
 - Gaps under corrugated cladding

Figure Title:

Bat Emergence Survey Results

Client/ Project Reference:

Chidhurst Limited
C-CHI-002

Figure number:

1

Revision:

1

Scale at A4:

1:400

Cartographer:

AO

Date drawn:

09/12/2025

Approver:

HB

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Photo 1: Displaying the infra-red camera field of view from building B3 - surveyor location 1 at the darkest point of the survey. Roost 1 and Roost 2 are circled.



Photo 2: Displaying the infra-red camera field of view from building B3 - surveyor location 2 at the darkest point of the survey.



Figure Title: Bat Emergence Surveys – Infra-red Camera Field of View and Bat Roost Photographs			Client: Chidhurst Limited	
Site Location: St Johns Farm, Trout lane, West Sussex, RH13 0JN			Project Ref: C-CHI-002	
Figure No: 2a	Revision No: 1	Scale: n/a		
Cartographer: AO	Date Drawn: 09/12/2025	Reviewed By: HB		

Photo 1: Displaying the infra-red camera field of view from building B3 - surveyor location 3 at the darkest point of the survey.



Photo 2: Displaying the infra-red camera field of view from building B5 - surveyor location 4 at the darkest point of the survey. Roosts 3, 4, 5 and 6 are circled.



Figure Title: Bat Emergence Surveys – Infra-red Camera Field of View and Bat Roost Photographs			Client: Chidhurst Limited
Site Location: St Johns Farm, Trout lane, West Sussex, RH13 0JN			Project Ref: C-CHI-002
Figure No: 2b	Revision No: 1	Scale: n/a	
Cartographer: AO	Date Drawn: 09/12/2025	Reviewed By: HB	

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Photo 1: Displaying the infra-red camera field of view from building B5 - surveyor location 5 at the darkest point of the survey.



Photo 2: Displaying the infra-red camera field of view from building B5 - surveyor location 6 at the darkest point of the survey.



Figure Title: Bat Emergence Surveys – Infra-red Camera Field of View and Bat Roost Photographs			Client: Chidhurst Limited
Site Location: St Johns Farm, Trout lane, West Sussex, RH13 0JN			Project Ref: C-CHI-002
Figure No: 2c	Revision No: 1	Scale: n/a	
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Photo 1: Displaying the infra-red camera field of view from building B6 - surveyor location 7 at the darkest point of the survey.



Photo 2: Displaying the infra-red camera field of view from building B6 - surveyor location 8 at the darkest point of the survey.



Figure Title: Bat Emergence Surveys – Infra-red Camera Field of View and Bat Roost Photographs			Client: Chidhurst Limited
Site Location: St Johns Farm, Trout lane, West Sussex, RH13 0JN			Project Ref: C-CHI-002
Figure No: 2d	Revision No: 1	Scale: n/a	
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1. Summary and Recommendations

Proposals	- Chidhurst Limited on behalf of their client are proposing a development at St John's Farm, Trout Lane, West Sussex, RH13 0JN. - The proposals include the demolition of seven existing commercial buildings; the construction of four new residential dwellings, with associated garages and driveways; and associated landscaping within the development boundary.
Surveys	- Two bat emergence surveys were undertaken on building B3, on the 30th July 2024 and the 19th September 2024, to determine the presence or likely absence of roosting bat at this building. - Two bat emergence surveys were undertaken on building B5, on the 14th August 2024 and the 4th September 2024, to determine the presence or likely absence of roosting bat at this building. - One bat emergence survey was undertaken on building B6 on the 20th August 2024, to determine the presence or likely absence of roosting bat at this building.
Impact assessment	- Two bat roosts were recorded at building B3 during the bat emergence surveys: Roost 1: Soprano pipistrelle day (Summer) roost. One soprano pipistrelle bat emerged from roost 1 during the second emergence survey. The bat emerged from between wooden cladding on the southeastern elevation of building B3. Roost 2: Common pipistrelle day (Summer) roost. Three common pipistrelle bats emerged from/ returned to roost 2 on the second emergence survey. Two common pipistrelle bats emerged from roost 2 during the second emergence survey. The bats emerged from/ returned to gaps between wooden cladding on the southeastern elevation of building B3. - Four bat roosts were recorded at building B5 during the bat emergence surveys: Roost 3: Common pipistrelle day (Summer) roost. One common pipistrelle emerged from roost 3 on the first emergence survey. The bat emerged from under the eaves on the southern elevation of building B5. Roost 4: Common pipistrelle day (Summer) roost. Two common pipistrelle bats emerged from roost 4 on the first emergence survey. Six common pipistrelle bats emerged from/ returned to roost 4 on the second emergence survey. The bats emerged from a gap under the timber frame on the apex of the western elevation of building B5. Roost 5: Pipistrelle sp. day (Summer) roost. One pipistrelle sp. emerged from roost 5 on the second emergence survey. The bat emerged from under the eaves on the southern elevation of building B5.



	○ Roost 6: Soprano pipistrelle day (Summer) roost. One common pipistrelle bat emerged from roost 6 during the second emergence survey. The bat emerged from a gap under the timber frame on the apex of the western elevation of building B5. ● The development will contravene the legislation outlining the protection of bats as: ○ The development will result in the permanent loss of at least six day (summer) roosts (common pipistrelle, soprano pipistrelle and pipistrelle sp.) in buildings B3 and B5. ○ The development may result in harm and/or disturbance to individual bats during the construction phase of the development. ● As the development will result in adverse impacts to bat roosts in buildings B3 and B5 and could result in harm to individual bats it will require approval under the licensing system administered by Natural England to proceed lawfully.
Recommendations	The recommendations below represent a summary only. The full recommendations are outlined in section 8 and should be referenced to in the use of this report. Buildings B3 and B5 ● To ensure the development proceeds lawfully, the mitigation strategy outlined in section 8 of this report should be followed, including obtaining a European Protected Species Licence (EPSL) from Natural England prior to the commencement of works. ● Bat survey data used to inform the EPSL should be collected in the most recent bat survey season (typically May - September). If significant time passes prior to obtaining the licence, further bat emergence surveys may be required. ● The installation of lighting as part of the development should be designed in line with current guidance issued by the Bat Conservation Trust and Institute of Lighting Professionals: Guidance Note 08/23: Bats and Artificial Lighting in the UK (BCT & ILP 2023).



2. Introduction

2.1 Development Location

2.1.1 Chidhurst Limited, on behalf of their client, are proposing a development (grid reference: TQ 13275 25523) at St Johns Farm, Trout Lane, West Sussex, RH13 0JN. The above address is hereafter referred to as 'the site' and Chidhurst Limited as the 'applicant'.

2.1.2 The local planning authority for the site's location is Horsham District Council (HDC).

2.2 Development Proposals

2.2.1 The applicant seeks planning consent for the redevelopment of a commercial site. The proposals include:

- Demolition of seven existing commercial buildings;
- Construction of four new residential dwellings, with associated garages and driveways;
- Associated landscaping within the development boundary.

2.2.2 The proposals above are hereafter referred to collectively as 'the development' in this report. The footprint of the works and their immediate surroundings are hereafter referred to as the 'development boundary'.

2.3 Ecology Background

2.3.1 A Preliminary Roost Assessment was undertaken by Arun Ecology Ltd at the site in July 2024 (Arun Ecology Ltd, 2025) that included a bat Preliminary Roost Assessment (PRA) of all buildings within the development boundary (buildings B1-B7). The results from the PRA relevant to this report include:

- Buildings B3 and B5 were assessed as having moderate suitability to support roosting bats. Building B6 was assessed as having low suitability to support roosting bats.
- As such, two bat emergence surveys were recommended at buildings B3 and B5 and one bat emergence survey was recommended at building B6 to determine the presence / likely absence of roosting bats.



2.4 Brief and Objectives

2.4.1 Arun Ecology Ltd was commissioned by the applicant to undertake two bat emergence surveys of buildings B3 and B5 and one bat emergence survey of building B6.

2.4.2 The key objectives of the bat emergence surveys, as per BCT Good Practice Guidelines for Ecologists (Collins, 2023) are to;

- Determine the presence or probable absence of bats;
- Characterise any bat roost types recorded and the number of bats using the roost; and
- Collect information on any bat roosts recorded in order to inform the planning application for the development and any bat mitigation licencing requirements.

2.4.3 The brief of the bat emergence surveys was to:

- Undertake a proportionate number of bat emergence surveys in line with the suitability classification assigned to them during the bat PRA and in line with the Bat Conservation Trust Good Practice Guidelines (Collins, 2023); and
- Provide a technical report supported by digitised mapping. The report will present the methods and results (including any limitations) of the bat emergence surveys. The report will also include a discussion of the relevant legislation and planning policy to bats.



3. Method

3.1 General Approach

- 3.1.1 The bat surveys were carried out in accordance with the Bat Conservation Trust Good Practice Guidelines for Ecologists (Collins, 2023).
- 3.1.2 The number and timing of the bat emergence survey visits were determined by the roost suitability classification assigned to buildings B3, B5 and B6 during the bat Preliminary Roost Assessment conducted by Arun Ecology Ltd in July 2024.

3.2 Bat Emergence Surveys

- 3.2.1 The bat emergence surveys commenced 15 minutes before the time of local sunset (source www.sunrisesunsetmap.com) and continued for 1.5 hours after sunset.

Recording Bats

- 3.2.2 Surveyors were positioned around the exterior of the building to observe all potential access/egress points and bat PRFs that were recorded in the PRA. The location of bat PRFs and surveyor locations for all bat emergence surveys are shown in Figure 2 and Figure 3.
- 3.2.3 The surveyors were aided by ultrasonic bat detectors (Elekon Batlogger M) to audibly record any bat echolocation calls from bats that emerged from or re-entered the building.
- 3.2.4 During the bat emergence surveys, infrared video cameras (models: Canon XA 40 and Canon XA 60) were used. The cameras were used in infrared mode by the surveyors with a 7-inch monitor to act both as a visual aid when watching bat PRFs as light levels dropped and to record the survey and any bats that emerged or re-entered the building. All infrared cameras were accompanied by two Nightfox 850 nm infrared torches to illuminate the area of the building in front of the surveyor location with infrared light.
- 3.2.5 Only bats that emerged or re-entered the building were recorded (in handwritten notes) by surveyors during the bat emergence survey to ensure concentration was retained on the bat PRFs at all times by surveyors.

Data Analysis

- 3.2.6 If bats were recorded emerging or re-entering the building, associated bat calls were subject to analysis using the Elekon Bat Explorer software. These were identified to



species level (where possible) or genus level, using British Bat Calls: A Guide to Species Identification, Russ J. M, 2012.

- 3.2.7 Infra-red camera footage collected by surveyors for each survey visit was analysed (watched) using the VLC media player software.

3.3 Survey Dates and Conditions

Bat Emergence Surveys

- 3.3.1 Information about the bat emergence surveys including the date and the weather conditions at the time of the survey are outlined below in Table 1.

Table 1 – Bat emergence survey information.

Visit	Survey type	Date	Survey timings		Temperature (°C)		Rain	Wind (Beaufort Scale)
			Start	Finish	Start	Finish		
Building B3								
1	Emergence survey	30/07/2024	20:35	22:20	19	17	No	3
2	Emergence survey	19/09/2024	18:49	20:34	21	18	No	2
Building B5								
1	Emergence survey	14/08/2024	20:07	21:52	18	17	No	2
2	Emergence survey	04/09/2024	19:23	21:08	16	15	No	2
Building B6								
1	Emergence survey	20/08/2024	19:55	21:40	19	16	No	4

- 3.3.2 Temperature was measured by the lead surveyor in degrees Celsius using the inbuilt meter within the Batlogger M detectors. Wind levels were also recorded, using the Beaufort scale.
- 3.3.3 For the bat emergence surveys, an overall assessment of the suitability of the weather conditions was made against those outlined in BCT Good Practice Guidelines for Ecologists (Collins, 2023), which state:

‘The aim should be to carry out surveys in conditions that are close to optimal (sunset temperature 10°C or above, no rain or strong wind)’.



3.3.4 All bat emergence surveys were undertaken (as outlined in Table 1) in suitable conditions in-line with the above statement.

3.4 Surveyors

Bat Emergence Surveys

3.4.1 A summary of the survey teams for the bat emergence surveys are outlined below in Table 2.

Table 2 – Bat emergence survey surveyor details.

Surveyor name	Job title and credentials	Bat emergence surveys completed
Molly Manwill	- Assistant Ecologist - BSc (Hons), MSc 3 years of bat surveying experience	- Building B3 – survey visit 2. - Building B5 – survey visit 2. - Building B6 – survey visit 1.
Robin Bassett	- Ecologist 3 Years of bat surveying experience	- Building B3 – survey visits 1 and 2. - Building B5 – survey visit 1. - Building B6 – survey visit 1.
Amy Oldham	- Consultant Ecologist - BSc (Hons) 2 seasons of bat surveying experience	- Building B3 – survey visits 1 and 2. - Building B5 – survey visit 2.
Joseph Baker	- BSc (Hons) – Principal Ecologist and Technical Director - Registered to use the Level 2 Class Licence to Survey Bats 8 years of professional bat surveying experience	- Building B3 – survey visit 1. - Building B5 – survey visit 1.

3.5 Limitations

3.5.1 No limitations were recorded during the Bat Emergence Surveys.



4. Results

4.1.1 The results of the bat emergence surveys undertaken at buildings B3, B5 and B6 are summarised below in Table 3 and shown in Figure 1, with photographs provided in Figure 2.

Table 3 – Summary of the bat emergence survey results from buildings B3, B5 and B6.

Survey visit	Surveyor location	Infra-red camera used (✓ = yes)	Surveyor records
Building B3			
Visit 1	SL01	✓	No bats were recorded emerging/ re-entering building B3.
Date: 30/07/2024 Start time: 20:35 Sunset time: 20:50 End time: 22:20	SL02	✓	No bats were recorded emerging/ re-entering building B3.
	SL03	✓	No bats were recorded emerging/ re-entering building B3.
Visit 2	SL01	✓	Roost 1 - One soprano pipistrelle emerged from a gap between wooden cladding at 19:08 (4 minutes after sunset) Roost 2 - One common pipistrelle emerged from a gap between wooden cladding at 19:09 (5 minutes after sunset) - One common pipistrelle emerged from a gap between wooden cladding at 19:12 (8 minutes after sunset) - One common pipistrelle re-entered a gap between wooden cladding at 20:20 (1 hour and 16 minutes after sunset)
	SL02	✓	No bats were recorded emerging/ re-entering building B3.
	SL03	✓	No bats were recorded emerging/ re-entering building B3.
Building B5			
Visit 1	SL04	✓	Roost 3 - One common pipistrelle emerged from under the eaves at 20:26 (4 minutes after sunset) Roost 4 - One common pipistrelle emerged from a gap under a timber frame at 20:28 (6 minutes after sunset)
Date: 14/08/2024 Start time: 20:07 Sunset time: 20:22 End time: 21:52			



			One common pipistrelle emerged from a gap under a timber frame at 20:30 (8 minutes after sunset)
	SL05	✓	No bats were recorded emerging/ re-entering building B5.
	SL06	✓	No bats were recorded emerging/ re-entering building B5.
Visit 2 Date: 04/09/2024 Start time: 19:23 Sunset time: 19:38 End time: 21:08	SL04	✓	Roost 4 - One common pipistrelle emerged from a gap under a timber frame at 19:36 (2 minutes before sunset) - Three common pipistrelles emerged from a gap under a timber frame at 19:37 (1 minute before sunset) - One common pipistrelle re-entered a gap under a timber frame at 20:46 (8 minutes after sunset) - One common pipistrelle re-entered a gap under a timber frame at 20:51 (13 minutes after sunset) Roost 5 - One pipistrelle sp. emerged from a gap under a timber frame at 19:36 (2 minutes before sunset) Roost 6 - Two soprano pipistrelles emerged from a gap under a timber frame at 20:05 (27 minutes after sunset)
	SL05	✓	No bats were recorded emerging/ re-entering building B5.
	SL06	✓	No bats were recorded emerging/ re-entering building B5.
	Building B6		
Visit 1 Date: 20/08/2024 Start time: 19:55 Sunset time: 20:10 End time: 21:40	SL07	✓	No bats were recorded emerging/ re-entering building B6.
	SL08	✓	No bats were recorded emerging/ re-entering building B6.

4.2 Bat Roost Characterisation

4.2.1 A summary of the bat roost characterisation for the bat roosts recorded at buildings B3 and B5 during the bat emergence surveys is provided in Table 4 Appendix II.



Building B3

Roost 1 – Soprano pipistrelle Day (Summer) Roost

- 4.2.2 Roost 1 has been characterised as a soprano pipistrelle day (summer) roost based upon the timing of the bat emergence surveys and due to the low number of bats emerging / returning to the roost during one survey. As such, a soprano pipistrelle maternity roost is considered likely absent. The identification of emerging bats was confirmed via sound analysis of the echolocation calls recorded at the time of the bat emergences/returns.

Roost 2 – Common pipistrelle Day (Summer) Roost

- 4.2.3 Roost 1 has been characterised as a common pipistrelle day (summer) roost based upon the timing of the bat emergence surveys and due to the low number of bats emerging / returning to the roost during one survey. As such, a common pipistrelle maternity roost is considered likely absent. The identification of emerging bats was confirmed via sound analysis of the echolocation calls recorded at the time of the bat emergences/returns.

Building B5

Roost 3 – Common pipistrelle Day (Summer) Roost

- 4.2.4 Roost 3 has been characterised as a common pipistrelle day (summer) roost based upon the timing of the bat emergence surveys and due to the low number of bats emerging / returning to the roost during one survey. As such, a common pipistrelle maternity roost is considered likely absent. The identification of emerging bats was confirmed via sound analysis of the echolocation calls recorded at the time of the bat emergences/returns.

Roost 4 – Common pipistrelle Day (Summer) Roost

- 4.2.5 Roost 4 has been characterised as a common pipistrelle day (summer) roost based upon the timing of the bat emergence surveys and due to the low number of bats emerging / returning to the roost during the surveys. As such, a common pipistrelle maternity roost is considered likely absent. The identification of emerging bats was confirmed via sound analysis of the echolocation calls recorded at the time of the bat emergences/returns.

Roost 5 – Pipistrelle sp. Day (Summer) Roost

- 4.2.6 Roost 5 has been characterised as a pipistrelle sp. day (summer) roost, based on the timing of the bat emergence surveys and due to only one bat emerging from the roost during one survey. As such, a pipistrelle maternity roost is considered likely



absent. The emerging bat did not produce echolocation calls during emergence; therefore, species confirmation via sound analysis was not possible. However, based on visual characteristics of the bat, the time of the emergence (19:36) and the roosting feature, the bat was considered most likely to be a pipistrelle species.

Roost 6 – Soprano pipistrelle Day (Summer) Roost

- 4.2.7 Roost 6 has been characterised as a soprano pipistrelle day (summer) roost based upon the timing of the bat emergence surveys and due to the low number of bats emerging / returning to the roost during one survey. As such, a soprano pipistrelle maternity roost is considered likely absent. The identification of emerging bats was confirmed via sound analysis of the echolocation calls recorded at the time of the bat emergences/returns.



5. Legislation and Planning Policy

5.1 Background

- 5.1.1 The purpose of this section is to evaluate the legislation and planning policy that we know are relevant to the development based upon all surveys undertaken at the site to date.

5.2 Bats

- 5.2.1 As set out in Appendix II, all bats and their roosts are protected, and the following legislation and planning policy is relevant to bats:

- Conservation of Habitats and Species Regulation 2017;
- Wildlife & Countryside Act, 1981 (as amended) – schedule 5;
- Natural Environment & Rural Communities (NERC), Act 2006 – S40 and S41;
- Countryside Right of Ways Act, 2000; and
- National Planning Policy Framework, 2024.

- 5.2.2 In addition to the above, Horsham District Council Adopted Local Plan (2015) and government circular 06/2005 is also relevant to the development as outlined in Appendix II.

Buildings B3 and B5

- 5.2.3 The development will contravene the legislation and planning policy outlining the protection of bats and their roosts for the following reasons:

- The development will result in the permanent destruction of at least two bat roosts on building B3. One soprano pipistrelle day (summer) roost (Roost 1) and one common pipistrelle day (summer) roost (Roost 2) on building B3;
- The development will result in the permanent destruction of at least four bat roosts on building B5. One soprano pipistrelle day (summer) roost (Roost 6), two common pipistrelle day (summer) roost (Roost 3 and Roost 4) and one pipistrelle sp. day roost (Roost 5) on building B5;
- The development could result in harm (through killing or injuring) and/or disturbance (by noise, vibration and light disturbance) to individual common pipistrelle, soprano pipistrelle and pipistrelle sp. bats during the construction phase of the development.



- 5.2.4 Recommendations are outlined in section 6.2 of this report to ensure the development is compliant with the legislation and planning policy relevant bats and is able to proceed lawfully.

5.3 Ecological Enhancement

- 5.3.1 In line with the NPPF (2024) all developments should incorporate ecological enhancements for the benefits of biodiversity into the design. Enhancements should be separate to any compensation or mitigation that might be required for bats or other protected species. The ecological enhancements recommended in the PEA (Arun Ecology Ltd, 2025) are deemed to be sufficient for this development, as such, no further ecological enhancements are recommended in this report.



6. Recommendations

6.1 Background

- 6.1.1 This section is based upon the results of all bat surveys undertaken to date and includes recommendations following the mitigation hierarchy (avoidance, mitigation and compensation; BSI, 2013) on how the development can proceed lawfully with respect to bats.

6.2 Bats

Mitigation Licence

- 6.2.1 Bats are confirmed to be roosting at buildings B3 and B5. Ideally, impacts to bats should be avoided wherever possible and bat access/egress points and known roosting locations integrated into the design of the development. However, the development includes proposals that cannot avoid impacts to bats and their roosts.
- 6.2.2 As the development will result in adverse impacts to bats and their roosts it will require approval under the licensing system administered by Natural England to proceed lawfully. A European Protected Species Licence (EPSL) will be required for the development to legally proceed.
- 6.2.3 A mitigation strategy that outlines how the development will meet the above criteria is provided in section 8 of this report.

Survey Validity

- 6.2.4 Bat emergence survey data used to inform bat mitigation licence requirements should typically be collected in the most recent bat survey season (typically May-September). As such, if sufficient time should pass (i.e. more than one bat survey season) before the EPSL is applied for, additional bat emergence surveys may be required.



7. Conclusion

- 7.1.1 The development will result in the destruction of at least six bat roosts in buildings B3 and B5 with the potential to cause harm to individual bats. Despite this, it will be possible for the development to proceed lawfully, provided that a European Protected Species (EPS) licence is obtained from Natural England prior to the commencement of works.
- 7.1.2 The recommendations outlined in this report will ensure that the development remains compliant with relevant legislation and planning policy relating to the protection of bats.



8. Bat Outline Mitigation Strategy

8.1 General Approach

- 8.1.1 As the development will result in adverse impacts to bats and their roosts, a European Protected Species licence (EPSL) will be required from Natural England for the works to proceed lawfully.
- 8.1.2 A detailed method statement reflecting the combined results of all survey work undertaken should be submitted as part of the EPSL application, once planning permission has been granted.
- 8.1.3 Under licence, the objectives of the mitigation strategy will be to:
- Avoid the killing or injury of bats by appropriate seasonal timing and supervision of works; and
 - To ensure the development does not negatively affect the favourable conservation status of bat populations within their natural range, by providing suitable alternative roosting opportunities.
- 8.1.4 This strategy is subject to approval by Natural England and the named ecologist, who may amend the scope based on their professional judgement.
- 8.1.5 An ESPL application should be supported by proportionate survey effort, conducted within the most recent bat season. Where this is not the case, additional surveys may be required and should be factored into the project timeline.

8.2 Safeguarding of Bats

Avoiding the killing or Injuring of Bats

- 8.2.1 Prior to commencement of works, one Schwegler 2F Universal Bat Box (or equivalent woodcrete box) will be installed on a suitable mature tree within the site to provide a suitable refuge to place any bats encountered during the works. This box will remain in place permanently.
- 8.2.2 A toolbox talk will be delivered by the named ecologist under the EPSL (or accredited agent) to all contractors involved in the removal of the roost features. The talk will include:
- Introduction of the named ecologist, or an accredited agent;
 - Legal protections afforded to bats and the need for a watching brief;



- Identification of roosting features, the working approach and what to do if a bat is encountered; and
- Instructions that a copy of the mitigation strategy must be available on site at all times.

- 8.2.3 Immediately prior to any works, all known and potential roosting features on buildings B3 and B5 will be inspected by the named ecologist or an accredited agent. If a bat is found during the pre-works inspection, measures to avoid harm will be implemented. Where harm cannot be avoided, excluders or capture methods (see 8.2.6–8.2.7) will be applied.
- 8.2.4 Following the inspection of roost features, both confirmed and potential roost features will be subject to soft-strip demolition by hand, under direct supervision of the named ecologist or an accredited agent. Close supervision may require the ecologist to be present on scaffolding or mechanical lifting equipment being used to strip the roof or other building features which bats might use, as far as it is safe to do so.
- 8.2.5 If a bat is encountered during works, all works will pause while the named ecologist (or an accredited agent) captures the bat, either by hand wearing suitable gloves or using a static hand-net. The bat will be placed in a cotton holding bag and transferred to a suitable bat box before works can resume.
- 8.2.6 Where it is not possible to capture and remove a bat using the above methods, a one-way excluder (e.g. a pro-cone square) will be fitted in conjunction with flange-wire mesh (suitable for bats) to the roosting feature. The roosting feature will be checked the following morning to ensure the bat has left before the feature is dismantled. If excluders cannot be used safely, the bat will be left in situ and the roost inspected the next morning, to see if the bat has left the roosting feature.
- 8.2.7 If a bat species is discovered that is not included in the EPSL, works will stop and an application for a licence amendment will be made to Natural England. Once the amendment to the EPSL has been accepted by Natural England, works can proceed.

Timing of Works

- 8.2.8 To avoid disturbance to any hibernating bats, all licensable works will be undertaken outside the typical hibernation season (November–March).



8.3 Mitigation and Compensation Proposals

Buildings B3 and B5

- 8.3.1 The proposals include the removal of buildings B3 and B5, as such all known roosts will be lost as part of the development. To mitigate for the loss of these roosts, two integrated bat boxes (1W1 Schwegler Summer and Winter Bat Box) will be installed on each of the four proposed dwellings. Additionally, two Schwegler 2FN bat boxes will be mounted on mature trees within the wider site ownership boundary.

Lighting Design Strategy

- 8.3.2 To ensure that the development avoids adverse impacts on the proposed bat roosting features and bat foraging and commuting habitats within the development boundary, any lighting as part of the proposed development should be installed in line with current guidance issued by the Bat Conservation Trust and Institute of Lighting Professionals: Guidance Note GN08/23 Bats and Artificial Lighting At Night (BCT & ILP 2023).
- 8.3.3 The lighting strategy for the development boundary as a minimum should aim to:
- Avoid illumination of the proposed bat roosting features within this mitigation statement within the development boundary and the adjacent ancient woodland; and
 - Minimise the overall levels of light pollution within the development boundary as a result of the development by:
 - Selecting appropriate lighting sources such as LED lighting that lack UV components, have peak wavelengths higher than 550 nm and that have a warm white light (2,700 kelvin or lower);
 - Appropriate fitting of lighting to include horizontal mounting with no light output above 90° and/or no upward tilt, or as a last resort the use of baffles, hoods or louvres to reduce light spill and direct lighting to only where it is needed; and
 - Using light only when necessary, within the development boundary, by using timers and motion sensors.

8.4 Monitoring

- 8.4.1 Monitoring may be required to ensure that the mitigation outlined above has been effective in safeguarding bats and their roosts, post-development. Details of post-development monitoring should be outlined in the EPSL application.



- 8.4.2 Monitoring results will be submitted to Natural England at the conclusion of the licence period.

8.5 Schedule of Works

- 8.5.1 A detailed schedule of works will be developed and included in the EPSL, outlining the timing for licence submission, mitigation delivery, and development phases.



9. Bibliography

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- 9.1.6 HDC (2015) Horsham District Council Adopted Local Plan.



Appendix I - Bat Roost Classification Summary

Table 4 – Classification of bat roosts recorded at buildings B3 and B5 during the bat emergence surveys.

Roost ID	Species	Access/ egress points	Internal void dimensions	Lighting present	Roost type confirmed	Evaluation and notes
Roost 1	Soprano pipistrelle	Gap between wooden cladding on the southeastern elevation of building B3.	Unknown	None	Day (Summer) roost	A peak count of one bat was recorded entering/emerging from this roost location.
Roost 2	Common pipistrelle	Gaps between wooden cladding on the southeastern elevation of building B3.	Unknown	None	Day (Summer) roost	A peak count of three bats were recorded entering/emerging from this roost location.
Roost 3	Common pipistrelle	Gap under eaves on the southern elevation of building B5.	Unknown	None	Day (Summer) roost	A peak count of one bat was recorded entering/ emerging from this roost location.
Roost 4	Common pipistrelle	Gap under timber frame at apex of western elevation of building B5.	Unknown	None	Day (Summer) roost	A peak count of six bats were recorded entering/ emerging from this roost location.
Roost 5	Pipistrelle sp.	Gap under eaves on the southern elevation of building B5.	Unknown	None	Day (Summer) roost	A peak count of one bat was recorded entering/ emerging from this roost location.
Roost 6	Soprano pipistrelle	Gap under timber frame at apex of western elevation of building B5.	Unknown	None	Day (Summer) roost	A peak count of one bat was recorded entering/ emerging from this roost location.



Appendix II – Legislation & Planning Policy

9.2 Background

- 9.2.1 This section provides a summary of the legislation and planning policy that could be relevant to the development. Where possible we have limited this section to the areas relevant to this report. This means the legislation and planning policy outlined below is not included in its entirety.
- 9.2.2 This section does not constitute legal advice, and only represents the interpretation and professional judgement of the ecologists named in this report, on the legislation and planning policy considered relevant to the development.

9.3 Conservation of Habitat and Species Regulations, 2017

- 9.3.1 The Conservation of Habitats and Species Regulations, 2017 transposes the EC Habitats Directive and some elements of the EC Bird Directive into national law in England and Wales. The objective of the Habitats Directive is to protect biodiversity through the conservation of natural habitats and species of wild fauna and flora. The directive lays down rules for the protection, management and exploitation of such habitats and species.

Protected Species

- 9.3.2 The regulations include provisions that prohibit certain actions from the protection of species listed under Annex II of the Habitat Directive. It is a criminal offence for a person to ‘intentionally or recklessly’ take the following action:
- Deliberately capture, injure or kill any wild animal of a European Protected Species (EPS);
 - Deliberately disturb wild animals of any such species in such a way as to be likely to affect significantly the local distribution or abundance of the species to which they are likely to belong;
 - Deliberately take or destroy eggs of any such wild animal;
 - Deliberately pick, collect, uproot or destroy a wild plant of an EPS; and
 - Keep transport, sell or exchange, or offer for sale or exchange, any live or dead wild animal or plant of an EPS, or any part of or anything derived from such an animal or plant.



9.3.3 The disturbance of such animals includes in particular; any disturbance that is likely to impact their ability;

- To survive, to breed or reproduce, or to rear or nurture their young;
- In case of animals of a hibernating or migratory species, to hibernate or migrate; or
- To affect significantly the local distribution or abundance of the species to which they belong.

Protected Sites

9.3.4 The Conservation of Habitats and Species Regulations, 2017 puts an obligation on the appointed appropriate authority for England & Wales to establish priorities for a network of nationally important sites.

9.3.5 The aforementioned sites, often referred to as European protected sites are formed of two types of sites, Special Protection Areas (sites specifically designated for birds) and Special Areas of Conservation (specifically designated for fauna and flora). The objective is for all species and habitats covered by these sites to contribute towards the maintenance and restoration of their favourable conservation status.

9.3.6 Designation can include but is not limited to the following reasons:

- A natural habitat type specified in Annex I of the Habitat Directive;
- A species specified in Annex II of the Habitats Directive;
- For the coherence of the national network of protected sites; and
- For threats of degradation or destruction to which the sites are exposed.

9.4 The Wildlife and Countryside Act, 1981 (as amended)

9.4.1 The Wildlife and Countryside Act, 1981 (as amended) primarily transposes the UK Governments obligations under the Bird Directive and Bern Convention into law. The act outlines provisions for the protection of nationally important sites for nature conservation and provides protection at different levels for certain animals and plants, including certain prohibitions.

Protection of Animals

9.4.2 Part 1 – Section 9 of the act includes certain prohibitions for the protection of certain animals named in schedule 5. In summary offences include:



- If any person intentionally or recklessly kills, injures or takes any wild animal included in schedule 5;
- If any person has in his possession or control any live or dead wild animal included in schedule 5, or any part of, or anything derived from, such an animal;
- If any person intentionally or recklessly damages or destroys, or obstructs access to, any structure or place which any wild animal included in schedule 5 uses for shelter or protection; or
- Disturb any such animal while it is occupying a structure or place which it uses for that purpose; and
- Sells, offers or exposes for sale, or has in their possession or transports for the purpose of sale, any live or dead wild animal included in schedule 5, or any part of, or anything derived from, such an animal, or publishes or causes to be published any advertisement likely to be understood as conveying that they buy or sell, or intends to buy or sell, any of those things.

9.5 Countryside Right of Ways Act, 2000 (CRoW, 2000)

- 9.5.1 The Countryside Right of Ways Act, 2000 (CRoW Act, 2000) makes provisions for public access, amends the law for public rights of ways and amends existing law on nature conservation and the protection of wildlife as well as makes further provisions for Areas of Outstanding Natural Beauty.

Wildlife Legislation

- 9.5.2 Part III of the CRoW Act, 2000 includes provisions for wildlife protection and nature conservation and includes amendments to the Wildlife & Countryside Act, 1981.
- 9.5.3 Schedule 9 of the CRoW Act, 2000 increases powers for the protection and management of SSSI. There are increased powers for appropriate authorities to secure management agreements for SSSI. A duty is placed on public bodies to have regard for the continued conservation and enhancement of SSSI. Furthermore, there are increased penalties for the prosecution of wildlife crime, including for third parties that damage SSSI.
- 9.5.4 Schedule 12 of the CRoW Act, 2000 makes certain offences under the provision of the Wildlife and Countryside Act, 1981 arrestable. Greater powers are given to police and appointed wildlife inspectors under the CRoW Act, 2000 and enables heavier penalties for the prosecution of wildlife crime.



9.6 Natural Environment & Rural Communities Act, 2006

- 9.6.1 The Natural Environment and Rural Communities Act (NERC), 2006 is primarily intended to implement key aspects of the governments rural strategy published in July 2004. It also addresses a wider range of issues relating broadly to the natural environment.

Section 40

- 9.6.2 Section 40 of the NERC Act, 2006, places a duty on any public authority and statutory undertaker to have due regard for the conservation and enhancement of biodiversity when delivering their functions, extending the provisions outlined under section 74 of the CRoW Act, 2000.

- 9.6.3 The policy goes on to state that conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population of that habitat.

Section 41

- 9.6.4 Section 41 of the NERC Act, 2006 requires the secretary of state in consultation with Natural England to outline Species of Principle Importance (SPI) and Habitats of Principle Importance (HPI) that in their opinion are important for the conservation of biodiversity.

- 9.6.5 The secretary of state is required to:

- Take such steps as appear to the secretary of state to be reasonably practicable to further the conservation of the living organisms and types of habitats included in any list published under this section; or
- Promote the taking by other of such steps.

- 9.6.6 The NERC Act, 2006 also provides some amendments to the Wildlife & Countryside Act, 1981 (as amended) and includes provisions for enforcement powers and the protection of SSSI.

9.7 National Planning Policy Framework (2024)

- 9.7.1 The National Planning Policy Framework (NPPF, Ministry of Housing Communities and Local Government, 2024) sets out the Governments planning policies for England and how these should be applied. It provides a framework which locally prepared plans for housing and other developments can be produced.

- 9.7.2 The NPPF supplements Government Circular: Biodiversity and Geological Conservation 06/2005 (Office of the Deputy Prime Minister, 2005).



Conserving and Enhancing the Natural Environment

- 9.7.3 Paragraph 187 states: Planning policies and decisions should contribute to and enhance the natural and local environment by:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising 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;
 - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
- 9.7.4 e) preventing 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
- 9.7.5 f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 9.7.6 Paragraph 188 states: Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁶⁵; 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.
- 9.7.7 Paragraph 189 states that: Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads⁶⁶. The scale and extent of development within all



these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

9.7.8 Paragraph 190 states that: When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development⁶⁷ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

9.7.9 Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

Habitats and biodiversity

9.7.10 Paragraph 192 states that: To protect and enhance biodiversity and geodiversity, plans should:

- 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
- b) 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.

9.7.11 When determining planning applications, local planning authorities should apply the following principles:



- a) 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;
- b) 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;
- c) 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
- d) 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.

9.7.12 The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar sites; and
- c) 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.

9.7.13 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.

Ground Conditions and Pollution

9.7.14 Planning policies and decisions should also 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 doing so they should:

- a) mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

9.8 Biodiversity and Geological Conservation Circular 06/2005

- 9.8.1 Biodiversity and geological conservation circular 06/2005 provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It complements the national planning policy in the NPPF, 2023 and the Planning Practice Guidance. Broadly the guidance covers designated sites, the conservation of habitats and species, including outside of designated sites, protected species by law and the duties and powers used by planning authorities.
- 9.8.2 Paragraph 82 of the guidance states that ‘in determining the application for development that is covered by up-to-date standing advice, a planning authority must take into account this standing advice’.

Protected Species and Planning

- 9.8.3 Paragraph 98 of the guidance states ‘the presence of a protected species is a material planning 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’.
- 9.8.4 Paragraph 98 also states that ‘they (the planning authority) 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.’
- 9.8.5 Paragraph 99 of the guidance goes on to state: ‘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’. Paragraph 99 also states that ‘this is justified only, where there



is a reasonable likelihood of the species being present and affected by the development.’

9.9 Horsham District Council Adopted Local Plan (2015)

Policy 25

- 9.9.1 Policy 25 sets out Horsham District Councils (HDCs) commitment to protecting the Natural Environment and Landscape Character. Policy 25 states:
- 9.9.2 The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development. The Council will support development proposals which:
- 9.9.3 Protects, conserves and enhances the landscape and townscape character, taking into account areas identified as being of landscape importance, the individual settlement characteristics, and maintains settlement separation.
- 9.9.4 Maintain and enhances the Green Infrastructure Network and addresses any identified deficiencies in the District.
- 9.9.5 Maintains and enhances the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, and ensures no net loss of wider biodiversity and provides net gains in biodiversity where possible.
- 9.9.6 Conserve and where possible enhance the setting of the South Downs National Park.

Policy 31

- 9.9.7 Policy 31 sets out Horsham District Councils (HDCs) commitment to protecting biodiversity in the district. Policy 31 states:
- 9.9.8 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.
- 9.9.9 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.

- 9.9.10 3) Where felling of protected trees is necessary, replacement planting with a suitable species will be required.
- 9.9.11 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); and
 - 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.
- 9.9.12 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.
- 9.9.13 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.



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