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& design



Ecological Appraisal

Client

Wain Estates (Land) Limited

Project

Shermanbury Road, Partridge Green

Date

July 2026

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Rev	Issue Status	Prepared/Date	Approved/Date
-	Final	MB CHK / 27.02.2026	NK / 06.03.2026
A	Final	HG / 16.06.2026	NK / 03.07.2026

1.0 NON-TECHNICAL SUMMARY

Report Scope and Methodology
[REDACTED] [REDACTED]
Results
[REDACTED] [REDACTED] [REDACTED]
Recommended Mitigation and Enhancements
Where possible, existing hedgerows and trees should be retained and buffered. Current proposals see that the northern extent of the Site is to be retained and enhanced, improving the scrub and modified grassland habitat. Vegetation clearance works should be undertaken following a precautionary working method to ensure breeding birds and reptiles are not harmed. [REDACTED] Retained hedgerows and scrub containing blackthorn, and adjacent grassland, should be subject to a reduced management regime. A 3-year coppicing cycle of hedgerows and scrub should be considered to encourage suckering blackthorn, which is the larval food source for brown hairstreak butterfly. Blackthorn should be included in proposed native planting mixes. Bat and bird boxes should be incorporated into the framework, along with a sensitive lighting scheme to reduce impacts on retained habitats and create dark corridors for bats.

2.0 INTRODUCTION

2.1 The following Ecological Appraisal has been prepared by FPCR Environment and Design Ltd ("FPCR") on behalf of Wain Estates for a proposed residential development on Shermanbury Road, Partridge Green (central OS Grid Reference: TQ 19844 19712), hereafter referred to as the 'Site'.

2.2 To inform this assessment, the following ecological surveys have been undertaken:

- Wintering Bird Surveys
- Ground Level Tree Assessments for Bats
- Potential Roost Assessment for Bats
- UKHab Survey and Condition Assessments



2.3 Additionally, the following surveys are underway and due to be completed in 2026:

- Bat Night-Time Walkovers & Static Detector Surveys
- Dormouse Presence/Likely Absence Surveys
- Reptile Presence/Likely Absence Surveys
- Breeding Bird Surveys
- GCN eDNA Survey

Site Context

2.4 The Site is 5.73 ha and comprised of a series of field compartments separated by hedgerows and wooden fencing. It is situated to the north of Shermanbury Road, east of Partridge Green village.

2.5 The southern extent of the Site features an office building, garage, garden and driveway bound by hedgerows. A residential property is situated outside of the boundary to the southeast of the Site, within land under the control of the applicant. The middle compartment was being used to graze horses and comprised mostly of grassland in the north with patches of scrub, hardstanding and stable building in the south. The northern extent of the Site was bisected by a well-used public footpath and had otherwise been without management for several years, allowing the development of patches of scattered scrub within the modified grassland along with dense thickets of scrub throughout.

2.6 The eastern boundary of the Site is formed by Green Tree Lane which leads to Keeper's Mead, a listed building and 'The Meadow' associated outdoor wedding venue, which lie adjacent to the Site's north and north-east boundary. The land directly west of the Site has been granted outline planning permission for a residential development of 120 dwellings (DC/24/0428). The north-west of the Site is bordered by an area of trees and scrub. The wider area consists of a mix of arable and pastoral fields bound by treelines and hedgerows, with several expanses of woodland to the north-east.

Site Proposals

- 2.7 The proposals, as shown in drawing number 13658-FPCR-ZZ-ZZ-DR-L-0002-P07, include the construction of up to 75 dwellings and associated green infrastructure including public open space, a play area and hedgerow planting. The area of grassland and scrub in the north of the Site will be retained for ecological enhancements.

Report Scope

- 2.8 The aim of the Ecological Appraisal is to:
- provide a summary of the methods and results of all new survey work and refer to previous work to establish an ecological baseline;
 - identify and describe all potentially significant ecological effects associated with the proposed development on important ecological features;
 - set out the mitigation measures required to ensure compliance with nature conservation legislation and to address any potential ecological effects; and
 - identify appropriate enhancement measures and consider biodiversity net gain.

3.0 LEGISLATION

3.1 This assessment has been informed by relevant international, national and local legislation and policy for ecology in relation to development sites, as detailed in *Appendix A*. Those more relevant to this assessment include:

- The Conservation of Habitats and Species Regulations (CHSR) 2017 (as amended) in relation to European Protected Species (EPS), Special Areas of Conservation (SAC), Special Protection Areas (SPAs) and internationally protected Ramsar Sites (collectively known as the "National Sites Network").
- The Wildlife and Countryside Act (WCA) 1981 (as amended) in relation to all wild birds (including Schedule 1 species), Schedule 5 species, flora listed under Schedules 8 and 9, and Sites of Special Scientific Interest (SSSI)
- The Environment Act 2021 in relation to a range of environmental protections and enhancements including requiring developments to demonstrate a mandatory biodiversity net gain following publication of secondary legislation.



- Natural Environmental and Rural Communities (NERC) Act 2006 in relation to various priority species and habitats.
- Hedgerow Regulations 1997 made under Section 97 of the Environment Act 1995.
- National Planning Policy Framework (NPPF) 2024, which sets out the Government's planning policy for England including measures to conserve and enhance the natural environment by protecting and enhancing valued landscapes, recognising the value and wider benefits of natural capital and minimising impacts/providing net gains for biodiversity.
- Non-statutory protected local sites including County Wildlife Sites (CWS), Sites of Importance for Nature Conservation (SINC), Local Wildlife Sites (LWS) and Ancient Woodland Inventory (AWI) sites.
- Local Biodiversity Action Plans (LBAP).
- Horsham District Planning Framework (2015) which includes the following relevant policies Policy 25: Strategic Policy: The Natural Environment and Landscape Character and Policy 31: Green Infrastructure and Biodiversity

4.0 METHODOLOGY

Desktop Study

- 4.1 To compile existing baseline information, relevant ecological information was gathered from:
- Sussex Biodiversity Records Centre (SBRC)
 - Multi Agency Geographic Information for the Countryside (MAGIC) Website (www.magic.defra.gov.uk)
 - Colour 1:25,000 OS base maps (www.ordnancesurvey.co.uk)
 - Aerial photographs from Google Earth (www.maps.google.co.uk)
 - Local planning portal (public-access.horsham.gov.uk/public-access/)
- 4.2 The search area around the Site for biodiversity information was related to the significance of Sites and species and potential zones of influence, as follows:
- 15km for Sites of International Importance e.g. SACs, SPAs and Ramsar Sites.
 - 2km for Sites of National or Regional Importance e.g. SSSIs and species records e.g. protected and notable species.
 - 1km for Sites of County Importance e.g. Local Wildlife Sites (LWS).

Habitats

- 4.3 A field survey was conducted by an experienced ecologist from FPCR on 19th January 2026 and updated on 1st May 2026. This involved a systematic walkover of the Site to classify the broad habitat types according to the UK Habitat (UKHab) Classification System² and identify any Habitats of Principal Importance (HPI) for the conservation of biodiversity as listed within Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act 2006. Habitats were broadly mapped in the field using a detailed topography map produced for the scheme using pens or pencils as appropriate.
- 4.4 Where feasible, target notes and species lists were compiled for individual areas and assessments of abundance were made using the DAFOR scale. Vascular plant nomenclature follows the latest edition of Stace³. Whilst the species lists collected should not be regarded as exhaustive, sufficient information was gained during the survey to enable classification and assessment of broad habitat types and identify features likely to be of interest.
- 4.5 Where appropriate, hedgerows were broadly assessed against the Wildlife and Landscape criteria contained within The Hedgerow Regulations 1997 to determine whether they qualified as 'Important Hedgerows'. This was achieved using a methodology in accordance with both the Regulations and DEFRA guidance. It should be noted that hedgerows may also qualify as Important under the Archaeology and History criteria of the Hedgerow Regulations 1997 Act, which is beyond the scope of this assessment.

² Butcher, B., Edmonds, B., Norton, L., & Treweek, J. (n.d.). The UK Habitats Classification System V2. UKHab. Available at: [from https://ukhab.org/](https://ukhab.org/)

³ Stace, C.A. (2019). New Flora of the British Isles. (4th Ed.). Cambridge: Cambridge University Press

Fauna

4.6 During the extended UKHab survey, observations, identification and signs of any species protected under the following list of Acts and Regulations (collectively referred to herein as 'Protected Species') were recorded:

- Schedule 1 of the Wildlife and Countryside Act 1981 (as amended);
- [REDACTED]
- The Conservation of Habitats and Species Regulations 2017 (as amended).

4.7 Consideration was also given to the existence and use of the Site by other fauna listed as one or more of the following (collectively referred to herein as 'Notable Species'):

- Species of Principal Importance (SPI) for the conservation of biodiversity in England under Section 41 (S41) of the NERC Act 2006;
- Species listed on any Local Biodiversity Action Plan (LBAP) initiatives;
- British Trust for Ornithology's (BTO) Birds of Conservation Concern (BoCC)⁴;
- Red Data Book (RDB) species.

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4.11

Bat Surveys

Habitat Assessment

- 4.12 The on-site habitats were assessed for their suitability for foraging and commuting bats, as informed by the desk study and the habitat survey on 19th January 2026. The Site was then categorised for its suitability for foraging and commuting bats, using the latest best practice guidelines⁶, to inform the necessary survey effort:

Table 1: Habitat Suitability Categories

Categories	Description	Further Surveys Required
None	No habitat features on site likely to be used by any commuting or foraging bats at any time of year.	None
Negligible	No obvious habitat features on site likely to be used as flightpaths or foraging bats. However, a small element of uncertainty remains to account for non-standard bat activity.	
Low	Habitat that could be used by a small number of bats as flightpaths or for foraging e.g. gappy hedgerows, unvegetated streams, lone tree.	Seasonal* (Spring – April/May, Summer – Jun/Jul/Aug, Autumn – Sept/Oct) night-time walkover surveys Seasonal* automated static detector monitoring
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for commuting and foraging e.g. tree lines, water, grassland, scrub.	Seasonal* night-time walkover surveys Monthly (Apr-Sep) automated static detector monitoring
High	Continuous high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting and foraging bats e.g. woodland, tree-lined watercourses, hedgerows, tree lines.	
* May need to increase survey effort to monthly if Annex II species are expected/detected or if significant commuting routes are identified.		

Ground Level Tree Assessment

- 4.13 A ground level tree assessment (GLTA) for roosting bat potential was completed by experienced FPCR ecologists on 21st January 2026. All trees on Site were searched for potential roosting features (PRFs) with the aid of a torch and binoculars, where appropriate. Features include:
- Natural holes (e.g. knot holes) arising from naturally shed or pruned branches.

⁶ Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edition). The Bat Conservation Trust, London.

- Man-made holes (e.g. cavities that have developed from flush cuts).
- Woodpecker holes.
- Cracks/splits in stems or branches (horizontal and vertical).
- Partially detached, or loose bark plates.
- Cankers (caused by localised bark death) in which cavities have developed.
- Other hollows or cavities, including butt rots.
- Compression of forks with occluded bark, forming potential cavities.
- Crossing stems or branches with suitable roosting space between.
- Ivy stems with diameters more than 50mm with suitable roosting space behind (or where roosting space can be seen where a mat of thinner stems has left a gap between the mat and the trunk).
- Bat or bird boxes.

4.14 Using professional judgement, the trees were then placed into bat roost potential categories as per BCT guidance (2023):

Table 2: GLTA Bat Roost Potential Categories

Categories	Description
NONE	Either no PRFs or highly unlikely to be any
FAR	Further Assessment Required – to establish if PRFs are present
PRF	A tree with at least one PRF

Preliminary Roost Assessment

- 4.15 An external and internal building assessment was carried out on all buildings on Site (*Figure 3*) on 21st January 2026, by experienced and accredited FPCR ecologists in line with current guidelines (BCT 2023).
- 4.16 The exteriors of the buildings were visually assessed for potential access points and evidence of bat activity. Features such as small gaps under barge/soffit/fascia boards, raised or missing ridge tiles and gaps at gable ends, which have potential to be used as access points, were sought. In addition, structural features were noted that could provide suitable hibernation potential. Evidence that bats actively used potential access points includes staining within gaps and bat droppings or urine staining under gaps, a note being made wherever these were present. Where they could be safely accessed, crevices were inspected for the presence of bats or their signs using torches, mirrors and endoscopes.
- 4.17 The interior of the buildings, including all accessible roof voids, were also visually assessed with the aid of an endoscope, mirrors and torches to identify potential or actual bat access points and roosting places and for evidence of current or past bat roosts. Definitive evidence of a bat roosts was determined by the presence of dead or live bats and droppings. Other less definitive signs were also sought as indicators of potential roosting bats, including urine staining, fur oil staining, feeding remains such as moth wings, audible calls, bat-fly (*Nycteribiid*) pupal cases and odour.

- 4.18 The absence of any of the above evidence was not considered to be definitive evidence that no roosts were present as bats may leave no visible sign of their presence, particularly where they occupy inaccessible or hidden spaces within a building.
- 4.19 The buildings were then placed into roost potential categories as per current BCT guidance (2023):

Table 3: Bat Roost Potential Categories for Buildings

Categories	Description	Further Surveys Required
Confirmed Roost	Evidence of roosting bats in the form of live/dead bats, droppings, urine staining, fur oil staining etc.	Three dusk emergence surveys at least three weeks apart between May-September and at least one between May-August.
High Potential	A structure with one or more PRFs that are obviously suitable for large numbers of bats on a more regular basis and/or longer duration due to their size, shelter, suitable conditions (height above ground, light levels, etc), and surrounding habitat. These structures have the potential to support high conservation status roosts such as those used for maternity or hibernation (classic site).	Where classic hibernation potential is present, hibernation surveys should be undertaken during the winter period.
Moderate Potential	A structure with one or more PRFs which could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only; the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).	Two dusk emergence surveys between May-September – at least one between May-August. Surveys undertaken at least 3 weeks apart. Precautionary method statement if works undertaken during winter (where non-classic hibernation potential exists).
Low Potential	A structure with one or more PRFs that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by large numbers of bats.	One dusk emergence survey between May-August (requirement based on professional judgement) Precautionary method statement if works undertaken during winter (where non-classic hibernation potential exists).
Negligible Potential	No obvious habitat features present that are likely to be used by roosting bats, but features may be present where a bat could theoretically roost, but it is considered very unlikely.	No further surveys required, but some vigilance may be required if the feature is impacted.
None	No habitat features on site that are likely to be used by bats at any time of year.	None

A classic hibernation site is considered to provide stable climatic conditions including temperature, humidity, and light levels, such as, but not limited to, underground structures which are subject to low levels of disturbance or specific-specific habitual requirements, e.g. brown long eared bats often use the same roost for maternity and hibernation.

A non-classic hibernation site is a location which does not conform to the criteria for classic sites but could be used by individual hibernating bats. It is usually not possible to identify non-classic hibernation sites through survey work.

DNA Sampling

- 4.20 Faecal samples found within the roof voids of Building B1 on 21st January 2026 were collected for DNA analysis in accordance with the protocol outlined within Appendix 4 of the BCT guidelines (2023).
- 4.21 Droppings were selected by the most recent and intact samples and carefully gathered to avoid cross contamination. Samples were placed in Eppendorf plastic tubes and transported to Ecotype Genetics Ltd laboratory at Sussex Innovation Centre, Brighton for analysis. Samples were subjected to a quantitative polymerase chain reaction (qPCR) analysis. DNA is extracted from ~0.2g faecal material using a standard protocol. Species identification was carried out by

first testing for common or soprano pipistrelle, brown-long-eared or *Myotis* genus bats. If *Myotis* was present, a further test was then run to identify the species.

- 4.22 The use of qPCR provides a binary yes or no result. The technique uses species-specific primers; therefore, a positive result is only given if DNA from the matching species is present. Each species-specific primer is tested against all other species to ensure no cross reactivity. Furthermore, during the reaction, each species test is run in duplicate and a result is only given if both replicates give the same result.

Wintering Bird Surveys

- 4.23 Four wintering bird surveys (WBS) were conducted between November 2025 and February 2026 to determine the population status of wintering birds in the survey area. The surveys broadly followed the non-breeding survey methodology as per the bird survey guidelines⁷. Standard BTO species codes and symbols for bird activities were used to identify birds and denote activity, sex and age where appropriate. The route around the survey area was mapped out prior to the surveys being undertaken, paying particular attention to linear features, such as hedgerows and tree lines, and natural features such as ponds and areas of scrub.
- 4.24 Surveys were programmed at times which maximised visibility to allow for increased visual identification of birds and no specific time of day was targeted. Surveys were not conducted in unfavourable conditions such as heavy rain or strong wind, (conditions which can negatively affect the results):

Table 4: WBS Dates and Conditions

Date	Cloud Cover (%)	Temperature (°C)	Rain	Wind (Beaufort scale)	Visibility
10 November 2025	100	13	Light	2	Good
19 December 2025	40	7	None	0	Very Good
28 January 2026	30	4	None	0-1	Very Good
18 February 2026	100	4	Drizzle	2-3	Good

Brown Hairstreak Survey

- 4.25 A targeted survey for brown hairstreak eggs was carried out by experienced invertebrate ecologists on 25th February 2026. This included a walkover survey of the Site to assess the hedgerows and scrub for their suitability for brown hairstreak butterfly *Thecla betulae*, using criteria from UK Butterfly Monitoring Survey (UKBMS) guidance⁸:

Table 5: Hedgerow Quality Criteria for Brown Hairstreak

Quality	Criteria
High quality habitat	20% blackthorn in hedge or on suckers in front of hedge, of which frequent (> 25%) young (< 3 years old) growth, not flailed recently or not significantly damaged by flailing or stock browsing.

⁷ Bird Survey & Assessment Steering Group (2025) Bird Survey Guidelines for assessing ecological impacts. Available at: <https://birdsurveyguidelines.org>

⁸ UK Butterfly Monitoring Scheme (2016) Brown Hairstreak monitoring guidance. Available at: https://ukbms.org/sites/default/files/downloads/NG3_Brown%20Hairstreak%20Egg%20Count%20Guidance_0.pdf

Quality	Criteria
Medium quality habitat	> 20% blackthorn in hedge, of which only occasional, rare or no (< 25%) young (< 3 years old) growth, significantly damaged by recent flailing or stock browsing, or too old and leggy. Occasional, rare or no suckers in front of hedge, or suckers significantly damaged by flailing or stock browsing.
Low quality habitat	5-20% blackthorn in hedge
Unsuitable habitat	< 5% blackthorn in hedge

- 4.26 Since adult brown hairstreak butterflies are elusive and tend to remain in the tree canopy, an egg search is a more reliable survey method. Eggs are usually laid singly in the fork of young blackthorn *Prunus spinosa* growth less than 1.5m above ground in sheltered positions with a west or south-facing aspect.
- 4.27 During the survey, only hedgerows or areas of scrub assessed as being high and medium quality hedgerows were selected for egg-searching to maximise the chances of finding eggs within the survey period, as well as those that had not been recently flailed/cut.
- 4.28 Each hedgerow was walked at a pace of roughly 1m a minute as per guidelines, inspecting as much of the blackthorn along each hedgerow as possible for a maximum period of 2 hours. The search focussed on the junctions between the new growth and the old wood on suckering blackthorn (shoots from the ground at edge of bushes) and young (1-2 years old) blackthorn twigs located 0.25-1.75m off the ground. Any brown hairstreak eggs found, including those which had been parasitized, predated or damaged, were counted.

Survey Limitations

- 4.29 Data provided by third party sources collated during the desktop study is generally made up from a wide range of sources including (but not limited to) those submitted by ecological consultancies, wildlife conservation organisations and volunteers. As such, this data is typically focused on areas of known nature conservation, is reliant upon formal surveys having been undertaken within an area or the presence of an expert within the locality (particularly for invertebrate records) and as such this data can never be fully relied upon as a complete ecological dataset for any given area. Rather, this data is used as a guide to likely presence of notable ecological features and can never be relied upon for likely absence.
- 4.30 The initial UKHab survey and condition assessments were completed in January 2026, which is outside of the optimal season for surveying habitats. As such, an update habitat survey was completed in May 2026.
- 4.31 Due to the timing of the planning application submission, several protected species surveys are still in progress and due to be completed later in 2026. This assessment therefore takes a precautionary approach assuming presence in the absence of a full data set. Once surveys are complete, a full Ecological Impact Assessment (EclIA) and appended species reports will be submitted.

5.0 RESULTS

Desk Study

Designated Sites

- 5.1 The locations of the following designated sites are mapped in *Figure 1*.
- 5.2 One international designation is located approximately 13.7km south-west of Site: Arun Valley, Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar. It is designated for its bogs, marshes and humid grassland habitats. It is designated as an SAC as it supports one of the three main populations of Ramshorn snail *Anisus vorticulus*, an Annex II species. The SPA designation is due to its regular use by Bewick's swan *Cygnus Columbianus bewickii*, an Annex I species. The Ramsar designation is due to the site's outstanding ornithological importance for wintering birds and breeding waders.
- 5.3 No nationally designated sites were located within 2km of the Site and no non-statutory designated sites were located within 1km.
- 5.4 Six areas of Ancient Semi-natural Woodland (ASNW) were located within 2km of the Site:
- Ash Wood approximately 530m south-west
 - Parkminster Wood approximately 820m north-east
 - Hangers Wood approximately 1550m east
 - Hatteral Wood approximately 1615m west
 - Longmead Shaw approximately 1720m north-west
 - Hookshile Wood approximately 1980m west

Protected/Notable Species

- 5.5 A number of species records were returned from the SBRC. Those from within the past 10 years and located within 1 km of the Site boundary have been shown on *Figure 2*. Bat records from within 2 km of the Site boundary have been included as per the BCT guidelines.

Habitats

- 5.6 The locations of the habitats described below are illustrated in *Figures 3* and *4*. Site photographs are shown in *Appendix B*.

Other Neutral Grassland

- 5.1 The majority of the Site is other neutral grassland, which was classified as such because there are more than 20% cover of broadleaved herbs, there are abundant grass species that were are not sown for agricultural purposes, and the cover of rye grasses *Lolium spp.* and white clover *Trifolium repens* is less than 30%.
- 5.2 The northern section of the Site, G1, is a mosaic of scrub and grassland. The grassland in this area is unmanaged, and as a result had varying sward height throughout, with some longer areas of over 50cm and other sections that showed evidence of being grazed by rabbits. There are areas dominated by creeping thistle *Cirsium arvense* and bramble *Rubus fruticosus agg.* is

encroaching from the areas of scrub and is present throughout the sward. Species present include abundant common bent *Agrostis capillaris*, common bird's foot trefoil *Lotus corniculatus*, red fescue *Festuca rubra*, and meadow fox tail *Alopecurus pratensis* and frequent germander speedwell *Veronica chamaedrys* and field woodrush *Luzula campestris*. There is also occasional white clover, woundwort *Stachys sylvatica*, figwort *Scrophularia nodosa* and soft rush *Juncus effusus* and rare tufted vetch *Vicia cracca*.

- 5.3 The central area of the Site is divided into horse paddocks. Some of these have been over grazed and poached resulting in sections that are largely bare ground. G2 on the western side of the Site appeared to have not been grazed for some time, meaning that a tussocky sward had developed and blackthorn scrub *Prunus spinosa* was encroaching from the western boundary. Species in this area include abundant common bent, Yorkshire fog *Holcus lanatus*, red fescue and smooth meadow grass *Poa pratensis* as well as occasional creeping cinquefoil *Potentilla reptans*, perennial rye grass and common bird's foot trefoil.
- 5.4 The sections on the eastern half of the Site, G3, were being grazed by two Exmoor ponies and a horse at the time of the update survey in 2026. This had led to short a sward height and species in this area are abundant Yorkshire fog, sweet vernal grass *Anthoxanthum odoratum*, red fescue and creeping buttercup *Ranunculus repens*. There is also frequent broad-leaved dock *Rumex obtusifolius*, meadow buttercup *Ranunculus acris* and white clover and occasional chickweed *Stellaria media*, creeping cinquefoil, creeping thistle and common ragwort *Jacobaea vulgaris*.
- 5.5 The southern section of grassland, G5, forms the garden of the residential property and features abundant common bent, Yorkshire fog, red fescue and yarrow *Achillea millefolium*, frequent, agrimony *Agrimonia eupatoria*, field woodrush, meadow fox tail, and rough meadow grass *Poa trivialis*. There is also occasional meadow buttercup, cut-leaved cranesbill *Geranium dissectum* and lesser stitchwort *Stellaria graminea* and rare cuckoo flower *Cardamine pratensis* and dandelion *Taraxacum sp.*. This grassland has an informal character due to infrequent mowing and there are areas of longer grass and herbs around the edges and adjacent to the hedgerows.

Modified Grassland

- 5.6 A small portion of the centre of the Site is modified grassland, which is characterised by the dominance of perennial rye grass. There is also abundant cleavers *Galium aparine* and common nettle *Urtica dioica* as a result of the nutrient enrichment caused by the manure pile in this area.

Scrub

- 5.7 There is a large amount of scrub on Site, particularly in the north, with scrub both around the peripheries and within the grasslands. The blocks of mixed scrub comprise of a variety of species including blackthorn, bramble *Rubus fruticosus*, dog-rose *Rosa canina*, pedunculate oak *Quercus robur*, hazel *Corylus avellana* and hawthorn *Crataegus monogyna*. Areas of scrub around G3 are dominated by blackthorn and there are two sections of bramble scrub and the south of G3 and around the horse arena.

Individual Trees

- 5.8 There are six trees within the Site boundary: all have been categorised as 'very large' (over 91cm in diameter at breast height) and all were pedunculate oak. Most of these trees were healthy

and all supported micro-habitats for other species. T1 is a veteran tree as detailed in the Arboricultural Report (FPCR, 2026).

Hardstanding

- 5.9 Developed land; sealed surface was present on Site in the form of stables, an outdoor riding arena, two garages and an office. These were all located in the south. Artificial unvegetated, unsealed surface was present in the form of a gravel driveway and path at the southern extent of the Site.

Bracken

- 5.10 The northern extent of the Site, under LT1 is dominated by bracken *Pteridium aquilinum*.

Ruderal/Ephemeral

- 5.11 Three areas of tall ruderal vegetation are present in the central section of the Site, around the stable, garage and horse arena. These areas are dominated by common nettle.

Hedgerows

- 5.12 There are three hedgerows and two lines of trees within the Site. The hedgerows were all located in the south, in association with the dwelling and stables. Hedgerows H1 and H3 were native hedgerows and comprised mostly of hawthorn and bramble, with ground flora including cleavers, broad-leaved dock and red-dead nettle *Lamium purpureum*. Both hedgerows H1 and H3 had small ditches associated with them. Hedgerow H2 was an ornamental hedgerow, comprised of an ornamental privet species *Lingustrum* spp.
- 5.13 The treelines were located in the north of the Site, with LT1 along the northern boundary and LT2 along the western boundary. Both lines of trees were comprised of mature pedunculate oaks.

Fauna

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Bats

- 5.18 The Site was considered to have moderate value for foraging and commuting bats. Whilst it supported linear features such as hedgerows, tree lines and areas of scrub connected to other suitable habitats offsite, such as woodland, the Site was dominated by grassland, which offers limited foraging opportunities.
- 5.19 Five buildings were present within the Site, the residential building, Dunstons, was located just outside the Site boundary, within land controlled by the applicant. Seven trees that supported potential roosting features (PRFs) were identified within the Site. A description of each and a summary of their potential to support roosting bats has been summarised in *Tables 6 and 7* below, locations of the buildings and trees are shown in Figure 5.

Table 6: Preliminary Roost Assessment Summary

Building	Description	Photo	Bat roost potential
B1 (outside Site boundary)	B1 was in use as a residential property. It comprised of a two-story brick-built structure and a pitched roof with clay tiles. Hanging tiles were also present on all aspects, on the upper halves of the walls. Slipped and missing tiles were present on all aspects of the building resulting in gaps that could allow access into the structure as well as roosting features in themselves for crevice-dwelling species. Internal inspection found the roof was spilt into two voids: RV1 and RV2. RV1 featured exposed wooden rafters, plastered ceilings and two Velux windows. It well sealed with no access points. RV2 was comprised of exposed wooden rafters and felt lining below the roof tiles. The felt appeared to be intact, but was loose, resulting in the void feeling drafty, indicating the presence of access points. The floor was not well sealed with areas of exposed installation and possible entry points from under the eaves. The interior was full of cobwebs and a large wasp nest was present. Three bat droppings scattered throughout RV2 were sent for DNA analysis and were confirmed to be from brown long-eared bat (BLE) <i>Plecotus auritus</i>.	 	Confirmed BLE Roost
B2	B2 was a single-story brick-built garage, featuring a clay tiled, pitched roof. Some gaps were present between tiles on both aspects. Internal inspection found the roof void was well sealed and the felt lining intact, preventing access. No evidence of roosting bats as identified.		Low

Building	Description	Photo	Bat roost potential
B3	B3 was in use as an office space. It is a single-story structure built out of brick and timber. It features a slate tile roof. The building is newly constructed and well-sealed. A small gap is present above the garage door, providing a potential access point into the structure. The internal inspection found the inside of the building to be well sealed. It featured Velux windows and exposed rafters constructed from machine cut timber beams. No evidence of roosting bats was identified.		Negligible
B4	B4 was a wooden shed with a corrugated metal pitched roof and eaves. A wooden door was situated on the eastern aspect. Potential access points included a gap in the fascia board through to the inside and a vent in the gable end. At the time of the survey both top and bottom stable doors were closed which also limited the potential for internal access for bats. Internal inspection revealed that the internal walls were covered by chipboard. No access for bat was possible behind the boards as the gaps were too tight and no crevices for roosting were present. The presence of the metal roof reduces the suitability of the shed as a day roost as metal has fluctuating thermal properties. No evidence of roosting bats was identified.		Negligible
B5	B5 was an open-sided barn constructed from corrugated metal, with an asbestos roof. No roof void was present. Inside was a small building featuring a flat wooden roof with rafters. Access was possible from the outside through a half-open barn door however the structure was heavily cobwebbed. The whole structure, including the internal building, were exposed to the elements and well lit, with no suitable crevices for roosting. No evidence of roosting bats was identified.		Negligible
B6	B6 was a single story open wooden stable with a corrugated metal roof. The front was completely open, leaving the inside very exposed with no suitable crevices for roosting bats present anywhere internally or externally. No evidence of roosting bats was identified.		Negligible

Table 7: PRF Tree Summary

Tree Ref.	Species	Potential Roosting Feature (PRFs)
T1	Pedunculate oak <i>Quercus robur</i>	Branch tear out 4m high north-east, 8m high west, two 13m high north-west Partially detached platey bark 7m high facing south-west Knot hole 4m high north-east and 12m high facing south Butt rot facing north-east
T2	Pedunculate oak <i>Quercus robur</i>	Branch tear out in trunk 3m high – eastern aspect
T3	Ash <i>Fraxinus excelsior</i>	Two knot holes 0.5m high on adjacent trees
T4	Pedunculate oak <i>Quercus robur</i>	Branch tear out with heart wood 6m high facing west Crack with deteriorating heart wood 8m high facing west Knot hole 10m high facing west
T5	Pedunculate oak <i>Quercus robur</i>	Knot hole on trunk 4m high – eastern aspect
T6	Pedunculate oak <i>Quercus robur</i>	Knot hole on dead limb 3m high – southern aspect
T7	Pedunculate oak <i>Quercus robur</i>	Knot hole from pruning with heart wood 3m high – northern aspect

Birds

Breeding Birds

- 5.20 All hedgerows, trees and scrub were suitable to support nesting birds. Habitat for ground nesting birds was limited due to the height of the unmanaged vegetation in the north providing insufficient sight lines and the presence of horses in the south.
- 5.21 Breeding bird surveys are underway at the time of writing and are scheduled to be completed in July 2026. Presence of nightingale *Luscinia megarhynchos* was identified in April 2026, and as such the survey effort was increased to include a survey beginning an hour before sunrise and a nocturnal survey beginning at midnight to capture the use of the Site by nightingale and assess breeding status.
- 5.22 Full results will be provided once all breeding bird surveys have been completed.

Wintering Birds

- 5.23 A total of 29 species were recorded on Site during the four winter bird surveys between November 2025 and February 2026 (Table 8), of which 14 were considered 'notable' species (Figure 6).

Table 8: WBS Summary

Species	Legal/Conservation Status	Peak Count	No. of Surveys Recorded
Protected and Notable Species			
Meadow Pipit <i>Anthus pratensis</i>	NERC S41, BoCC Red List	1	1
Greenfinch <i>Chloris chloris</i>	BoCC Red List	1	1
Stock dove <i>Columba oenas</i>	BoCC Amber List	1	1
Woodpigeon <i>Columba palumbus</i>	BoCC Amber List	25	4
Rook <i>Corvus frugilegus</i>	BoCC Amber List	2	1
Linnet <i>Linaria cannabina</i>	NERC S41, BoCC Red List	15	1
Wren <i>Troglodytes troglodytes</i>	BoCC Amber List	13	4
Dunnock <i>Prunella modularis</i>	NERC S41, BoCC Amber List	6	3

Species	Legal/Conservation Status	Peak Count	No. of Surveys Recorded
House Sparrow <i>Passer domesticus</i>	NERC S41, BoCC Red List	1 colony	2
Bullfinch <i>Pyrrhula pyrrhula</i>	NERC S41, BoCC Amber List	1	1
Starling <i>Sturnus vulgaris</i>	NERC S41, BoCC Red List	4	3
Song Thrush <i>Turdus philomelos</i>	NERC S41, BoCC Amber List	2	3
Fieldfare <i>Turdus pilaris</i>	WCA Sch1, BoCC Red List	2	3
Redwing <i>Turdus iliacus</i>	WCA Sch1, BoCC Amber List	31	4
Common and Widespread Species			
Long-tailed Tit <i>Aegithalos caudatus</i>	BoCC Green List	4	2
Goldfinch <i>Carduelis carduelis</i>	BoCC Green List	3	2
Jackdaw <i>Coloeus monedula</i>	BoCC Green List	1	1
Carrion Crow <i>Corvus corone</i>	BoCC Green List	4	4
Blue Tit <i>Cyanistes caeruleus</i>	BoCC Green List	20	4
Great Spotted Woodpecker <i>Dendrocopos major</i>	BoCC Green List	3	3
Robin <i>Erithacus rubecula</i>	BoCC Green List	11	4
Chaffinch <i>Fringilla coelebs</i>	BoCC Green List	2	2
Jay <i>Garrulus glandarius</i>	BoCC Green List	1	1
Pied Wagtail <i>Motacilla alba</i>	BoCC Green List	1	2
Great Tit <i>Parus major</i>	BoCC Green List	6	4
Magpie <i>Pica pica</i>	BoCC Green List	2	4
Green Woodpecker <i>Picus viridis</i>	BoCC Green List	1	1
Goldcrest <i>Regulus regulus</i>	BoCC Green List	4	1
Blackbird <i>Turdus merula</i>	BoCC Green List	3	4

- 5.24 The species recorded were typical of the habitats present on Site, namely scrub, grassland and hedgerows. The grassland, grazed by horses, was of limited suitability for most species, with corvids, woodpigeon and pied wagtail the only species recorded utilising this habitat. The scrub and hedgerows provided more suitable foraging habitat for a variety of species, such as common tit and finch species as well as wintering thrushes such as redwing and fieldfare. A peak count of 31 redwing was recorded within the Site, foraging within the scrub. Overall, most species recorded on the Site were common and widespread, generalist species, with no rare specialist species.

Great Crested Newts

- 5.25 Over 80 records of great crested newts (GCN) were returned within 1km of the Site boundary. These were all dated over 10 years ago, with the most recent being 2015 and the oldest 1988.
- 5.26 The grazed modified grassland and areas of hardstanding in south of the Site do not provide optimal terrestrial habitat for GCN. However, hedgerows and pockets of scrub throughout the Site provide suitable habitat for GCN in their terrestrial phase.
- 5.27 No ponds were present within the Site boundary. One ditch was present on Site, which at the time of the January 2026 survey contained only a small amount of water despite high rainfall in the days leading up to the survey. Site visits during Spring and Summer identified that this

ditch was usually dry or only contained very small amounts of water, meaning that it is thought that the ditch lacks water during the breeding period for GCN, making the ditch unsuitable as breeding habitat for the species.

- 5.28 Within a 500m buffer of the Site were 17 additional ponds. These have been outlined in *Table 9* and shown on *Figure 5*.

Table 9: Pond Locations

Pond	Location
P1	25m east, located in Keeper's mead adjacent to Site, connected to Site via grassland and scrub.
P2	30m west, situated in area of trees and scrub adjacent to Site.
P3	35m south, separated from Site by Shermanbury Road.
P4	40m south, separated from Site by Shermanbury Road.
P5	90m north-east, located along a treeline/hedgerow, connected to Site via grassland and hedgerows.
P6	130m south, separated from Site by Shermanbury Road.
P7	135m west, situated in area of trees and scrub adjacent to Site.
P8	190m east, separated from Site by Greentree Lane.
P9	235m north-east, located in Wymark's wood, connected to Site via woodland, grassland and hedgerows.
P10	320 m north-west, connected to the Site via woodland and grassland
P11	Adjacent to P10, 355m north-west, connected to the Site via woodland and grassland
P12	430, north-west, area of wet woodland, connected to the Site via woodland and scrub
P13	480m south-east, separated from the Site by arable fields and Shermanbury Road
P14	430m west, connected to the Site via hedgerows, scrub and grassland
P15	400m north-east, connected to the Site via hedgerows and woodland
P16	470m north-east, located in Wymarks Wood, connected to the Site through woodland
P17	360m north-east, located in Felix Plantation, connected to the Site via woodland

- 5.29 Access to survey the offsite ponds using environmental DNA (eDNA) for GCN was sought in April 2026. However, only access to P12 was granted. This returned a negative result, meaning GCN are likely to be absent from this waterbody (*Appendix C*).

Hazel Dormice

- 5.30 No records of dormice from within 1km of the Site boundary were returned from SBRC.
- 5.31 The hedgerows and dense scrub present on Site provide suitable habitat for nesting and foraging Hazel dormice. The Site has good connectivity via trees, hedgerows and scrub to nearby areas of woodland, which provide optimal habitat for dormice and were well connected to other areas of suitable habitat in the wider area.

- 5.32 Footprint tunnel surveys for hazel dormice are being undertaken at the time of writing and are due to be completed in Summer 2026, which will determine the presence/likely absence of this species.

Reptiles

- 5.33 Records of two slow worm, one grass snake and one common lizard within 1km of the Site boundary were returned from SBRC.
- 5.34 The habitats present on Site are considered suitable for reptiles. The unmanaged grassland and scrub, which form the northern extent of the Site along with the boundary hedgerows, provide potential foraging, basking and commuting opportunities for common reptile species.
- 5.35 Presence/likely absence surveys for reptiles are being undertaken at the time of writing. To date a number of slow worms have been identified within the Site. A population estimate will be carried out once surveys have been completed.

Invertebrates

- 5.36 The Site is dominated by modified grassland, with areas of mixed scrub, and hedgerows and trees. The habitats are likely to support an assemblage of common and widespread invertebrate species.
- 5.37 In addition, one record of brown hairstreak (BH) butterfly *Thecla betulae* was returned from within the south of the Site by the data search.
- 5.38 There are multiple hedgerows and areas of scrub within the Site comprising a high proportion of young/suckering blackthorn, which provided suitable habitat for adult BH to lay eggs upon, and to act as a food source for larval stages of BH.
- 5.39 The BH egg survey completed on 25 February 2026 identified 13 BH eggs on blackthorn on Site, as shown in *Figure 7*.

6.0 DISCUSSION

Statutory Designated Sites

- 6.1 The Site is located approximately 13.7km away from Arun Valley SPA, SAC and Ramsar, which has been designated due to supporting a large population of Bewick's swans *Cygnus Columbianus bewickii* and an assemblage of wintering waterfowl and wader species.
- 6.2 The developments are unlikely to have an impact on wintering waterfowl due to a lack of wetland habitat and open farmland on Site, which would provide a feeding resource for these species. Bewick's swan use areas of farmland with leftover grain as feeding habitat. These food resources are not present on the development Site, making it unlikely that the species would travel over 10km from Arun Valley to the development Site. Therefore, it is unlikely that the assemblages of wintering birds, including Berwicks swan, supported by the Arun Valley are reliant on the development Site.
- 6.3 It is unlikely that development of the Site will increase recreational pressures on the Arun Valley. The Arun Valley is outside of suitable walking distance from the development Site and approximately a 27-mile round trip by car. Furthermore, a large area of the Arun Valley is an RSPB Site meaning visitor numbers are controlled and visitors are confined to stay on certain pathways.

Non-Statutory Designated Sites

- 6.4 Six designated areas of Ancient Semi-natural Woodland were located with 2km of the Site. The closest of these were Ash Wood 530m south-west and Parkminster Wood 820m east. No public rights of way run through either woodland although there is a footpath located to the east of Ash Wood and a bridleway just south of Parkminster Wood. It is unlikely that residents of the new development would enter either of these areas of woodland due to the presence of the King George Playing field and other public rights of way in close proximity to the Site.
- 6.5 The other four designated areas of ancient woodland are located over a kilometre from the Site and also have no public rights of way within them. Therefore, recreational impacts as a result of the development are not anticipated.

Habitats

- 6.6 The Site was dominated by other neutral grassland, with areas of mixed scrub, particularly in the north of the Site and along the western boundary, as well as blackthorn scrub along the eastern boundary.

Mitigation

- 6.7 The loss of medium distinctiveness habitats, including scrub, grassland and trees, should be avoided wherever possible. These habitats have intrinsic value for biodiversity. Notably, the loss of trees would lead to a substantial loss to biodiversity on Site, as all of these were recorded as 'very large' oak trees (DBH >91cm). Most trees are proposed to be retained within the current proposals, with only one tree in the southern section of the site to be removed to allow for access. The mosaic of scrub and grassland in the northern parcel of the Site will also

be retained and enhanced by additional tree planting and enhancing the species diversity of the grassland.

- 6.8 Hedgerows and lines of trees should be retained and buffered from the development wherever possible. Protective fencing may be required during construction, to ensure construction activities do not impact on the root protection areas (RPA) of retained hedgerows, trees or scrub. This should be informed by the Arboricultural Impact Assessment for the Site (FPCR, 2026).

Enhancements

- 6.9 The dominant modified grassland is a common and widespread habitat of low conservation value, and in terms of BNG, it is a low distinctiveness habitat. There is an opportunity to enhance retained grassland habitats to a higher distinctiveness habitat (other neutral grassland) through the removal and control of palatable grasses, especially perennial rye grass through seeding with yellow-rattle *Rhinanthus minor*. The grassland may need to be over-seeded with a suitable neutral grassland wildflower mix to encourage diversity, and reduced management including either light grazing or an annual cut is also recommended.
- 6.10 Additional enhancements could include planting of additional native hedgerows and trees throughout the development, to provide connectivity across the Site. Hedgerows are recommended to be species-rich native hedgerows wherever possible, to maximise their biodiversity value, including flowering and fruiting species such as elder *Sambucus nigra*, hawthorn, hazel, oak, wild privet *Ligustrum vulgare*, and guelder rose *Viburnum opulus*.

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Bats

Further Surveys

- 6.15 The Site has been assessed as having moderate suitability for foraging and commuting bats. The grazed grassland on Site offers limited suitability for these behaviours. The treelines, hedgerow and scrub offer greater suitability so seasonal night-time bat walkover (NBW) surveys and monthly automated detector surveys are scheduled to be undertaken between Spring and Autumn 2026, in accordance with BCT guidelines (2023).
- 6.16 Eight trees were assessed to have potential to support roosting bats, those which are to be impacted by the current or future proposals, will require further aerial or nocturnal assessments. This will depend on whether individual trees are suitable to be climbed.
- 6.17 Nocturnal surveys will be required for buildings B1 and B2 as these building were found to have potential to support roosting bats. Since B1 is a confirmed BLE roost, three separate nocturnal surveys will be required between May and September, with at least two of the survey efforts occurring between May and August. At least three weeks will be left between each of the surveys, in line with current guidelines. B2 was found to have low bat roost potential and therefore requires one nocturnal survey, which should take place between May and August. If emergences from bats are recorded during the initial survey, two further surveys of B2 will also be required. These will be scheduled to take place in 2026.

Mitigation

- 6.18 A detailed assessment of impacts on bats will be made following the completion of the 2026 surveys. The current proposals see that the majority of the tree lines and scrub are to be retained and enhanced, improving the quality of these resources for bats. The majority of the habitat that is to be lost by the current proposals is the grazed modified grassland habitat that was assessed as having low suitability for foraging and commuting bats. Furthermore, the implementation of new trees and hedgerow planting around the Site will provide valuable additional opportunities for bats.

- 6.19 For B1 and any other bat roosts identified on Site, a Natural England mitigation licence application will be required to facilitate the proposals. The scheme offers ample opportunities for mitigation, such as the provision of bat boxes on retained trees, to provide the necessary compensation required as part of any licence.
- 6.20 A sensitive lighting scheme should be implemented across the development to minimise impacts on bats and other wildlife. Best practice measures^{9,10} include:
- The avoidance of unnecessary lighting and direct lighting on boundary habitats.
 - Minimising light spill with the use of directional lighting.
 - Restricting the height of light columns to reduce horizontal spill.
 - Installing low wattage LED security lighting on timers on properties close to green infrastructure during construction to avoid future homeowners installing unsuitable lighting for bats.

Birds

Breeding Birds

- 6.21 The majority of the habitat suitable to support breeding birds is to be retained by the proposals. Breeding bird surveys are being undertaken on Site throughout Spring and Summer 2026, after which a more detailed assessment will be made and mitigation recommendations provided.

Wintering Birds

- 6.22 The retention of the trees, scrub and rough grassland within the northern area of the Site will continue to provide suitable habitat for the range of foraging and wintering bird species recorded within the Site. The loss of some of the grassland habitat will have a limited impact on the bird assemblage as very few species utilised this habitat, with the scrub providing better foraging opportunities. The development greenspace and maturation of gardens will also provide suitable foraging habitat for species, especially those which adapt well to human environs such as dunnock and song thrush.

Mitigation

- 6.23 To avoid any disturbance to breeding birds, any ground clearance works and vegetation removal should avoid the bird breeding season (March to September, inclusive). If this is not possible, the area should be checked immediately prior to works by an experienced ecologist. In the event that an active nest is found, vegetation will be left untouched and suitably buffered from works until all birds have fledged.

Enhancements

- 6.24 Additional enhancements that could be integrated within the development include the erection of a mixture of nest box types:

⁹ Institute of Lighting Professionals (2021) *Guidance Note 01/21 The Reduction of Obtrusive Light*. ILP, Warwickshire.

¹⁰ Institute of Lighting Professionals (2023) *Guidance Note 8 Bats and Artificial Lighting*. ILP, Bat Conservation Trust, London.

- A mixture of small hole (26mm and 32mm) boxes could be placed along the retained habitat around the proposed development area to provide nesting opportunities for blue tit *Cyanistes caeruleus* and great tit *Parus major*. These boxes generally have a high uptake rate.
- Small open fronted nest boxes should be placed throughout the Site, especially on trees which support a climber such as ivy which provides a degree of concealment. These boxes typically attract robin and blackbird.

6.25 Consideration should subsequently be given to the provision of nest boxes for urban birds on new buildings, including house sparrow, house martin, swallow, and swift. Given the urbanised nature of the proposed development, opportunities exist to encourage these species to breed on Site.

GCN

6.26 The grassland and scrub habitat forming the northern extent of the Site, suitable to support terrestrial GCN, is set to be retained and enhanced by the current proposals. One ditch was identified on Site and assessed to be unlikely to be suitable to support breeding GCN due to the small quantity of water.

6.27 The eDNA survey completed on P12 returned a negative result for GCN, meaning they are likely absent from this waterbody. As access was not granted to survey the other ponds within 500m of the Site boundary, it cannot be assumed that GCN are absent from the Site.

Mitigation

6.28 Mitigation measures are required to ensure GCN are not harmed as a result of the development. Following conversations between Wain Estates and FPCR, it was decided that the scheme will seek to secure a District Level Licence from NatureSpace which will allow the development to go ahead, without committing an offence.

Hazel Dormouse

6.29 The hedgerows and scrub present on Site provide suitable habitat to support hazel dormice. Footprint tunnel surveys are being undertaken on Site in 2026 to determine whether the species is present or likely absent.

Mitigation

6.30 If found to be present on Site, hazel dormice could be injured or killed during the construction phase, so a European Protected Species (EPS) mitigation licence will be required from Natural England. Impacts on the species will be minimal as the majority of the scrub habitat on Site is to be retained. Mitigation as part of the licence will include habitat clearance at sensitive times under supervision with hand tools only, the provision of dormouse boxes for alternative nesting opportunities and habitat creation.

6.31 Once the Site is occupied there is the potential for increase in predation from domestic cats. However, since dormice are an arboreal species, they are unlikely to be on the ground compared to other rodents, making them a rare target for cats. Should hazel dormice be present on Site, there are measures that can be implemented to further reduce the risk of predation. This

includes, buffering habitat with thorny species, installing nest boxes high up and educating owners on responsible cat ownership.

Enhancement

- 6.32 The trees and scrub making up the northern extent of the Site are set to be retained by the current proposals, providing suitable foraging and nesting opportunities for hazel dormice. Furthermore, a new native hedgerow is set to be planted along the eastern boundary, creating new suitable habitat for hazel dormice. This can be buffered to limit disturbances. Nest boxes can also be installed around the Site.

Reptiles

- 6.33 The grazed modified grassland and hardstanding present in the southern extent of the Site offer limited suitability for reptiles. Suitable habitat consists mostly of the unmanaged modified grassland and scrub in the northern extent, which is to be retained and buffered by the current proposals. Reptile presence/likely absence surveys are being undertaken throughout Spring and Summer 2026.

Mitigation

- 6.34 If reptiles are found using the Site, they could be killed or injured during vegetation removal and construction. Appropriate mitigation measures can be implemented to reduce the likelihood of harming reptiles. This can include a passive displacement exercise, or, if the Site is considered a key reptile Site, a trapping or translocation exercise will be implemented.

Enhancements

- 6.35 The enhancement of the grassland and scrub in the northern extent and the creation of new hedgerows will result in greater foraging resources for reptiles as well as improved areas for refuge, commuting and breeding.
- 6.36 The maturation of gardens may also provide valuable habitat for slow worms.

Invertebrates

- 6.37 Areas of blackthorn scrub, and mixed scrub and hedgerows with high proportions of blackthorn, provide suitable habitat for brown hairstreak on Site.
- 6.38 An indication of the population size is not possible from egg counts alone. However, it is known that brown hairstreak colonies breed over large areas of habitat with several square kilometres of hedgerows and woodlands. As such, the eggs found on Site are likely to be part of a wider population in the local area.

Mitigation

- 6.39 It is recommended that hedgerows and blackthorn scrub are retained as far as possible within the proposals, to minimise the habitat loss for this species.

- 6.40 The current framework plan includes the retention of the blackthorn scrub along the eastern edge of the development, and retention of the scrub in the northern portion of the Site. This will retain the habitats where 9 of the 13 eggs were recorded.

Enhancements

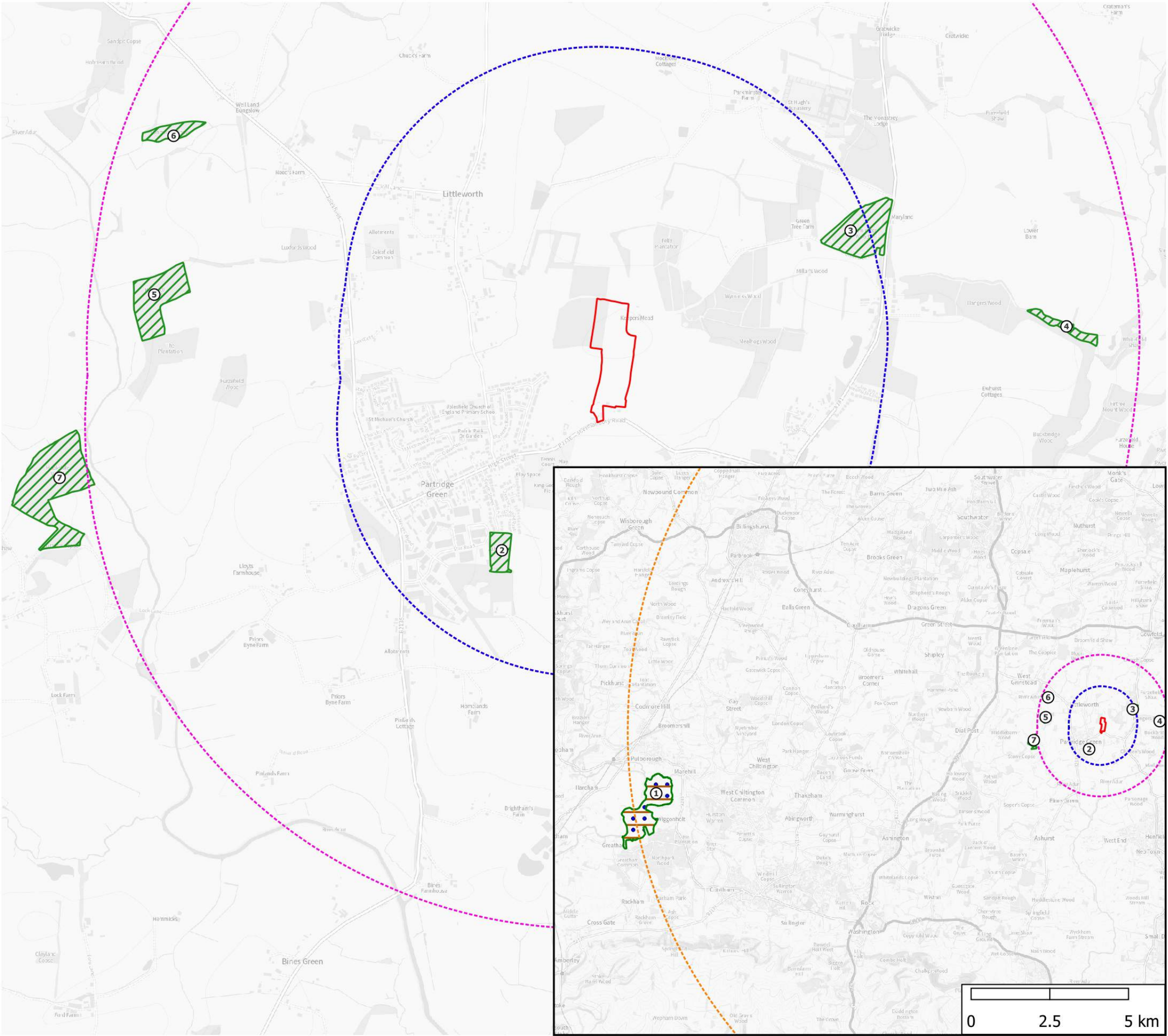
- 6.41 Retained hedgerows and scrub which contain high proportions of blackthorn should be subject to a reduced management regime, and edge habitats should also be sensitively managed to allow blackthorn suckers to grow, which provide a food source for BH larvae.
- 6.42 Sections of scrub should also be coppiced on a 3-year cycle, meaning that some suckering blackthorn is always present to allow BH to lay their eggs. This would also provide benefits for other wildlife.
- 6.43 In-fill planting with blackthorn, or planting of additional areas of mixed scrub with blackthorn as a component, is also recommended. Especially in the north of the Site, where a grassland-scrub mosaic will be retained.

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Key:

	Site Boundary
	1km Buffer
	2km Buffer
	15km Buffer
	Ancient Semi-Natural Woodland (ASNW)
	Ramsar
	Special Areas of Conservation (SAC)
	Special Protection Areas (SPA)

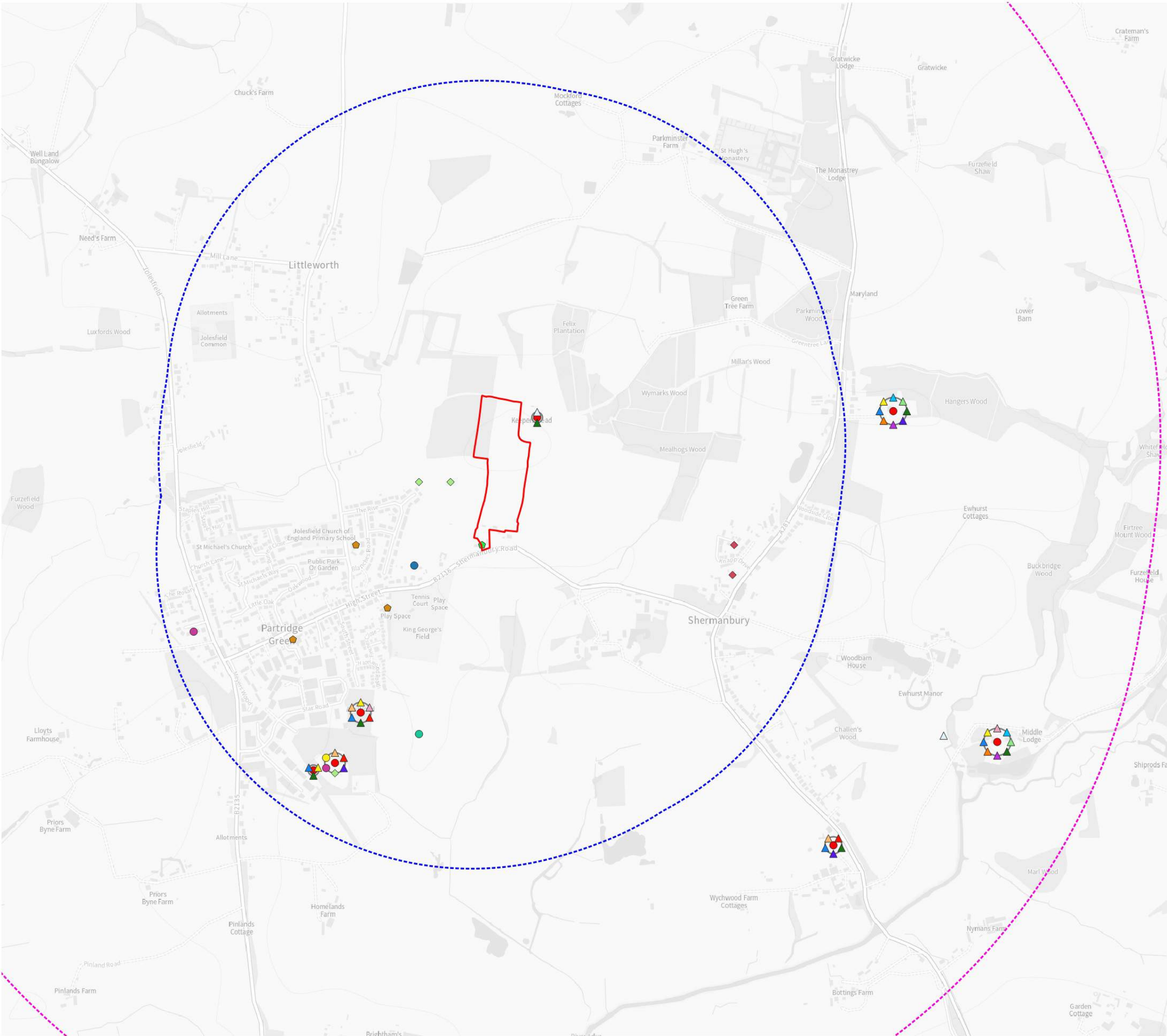
Ref.	Name	Designation
1	Arun Valley	SPA, SAC, Ramsar
2	Ash Wood	ASNW
3	Parkminster Wood	ASNW
4	Hangers Wood	ASNW
5	Hatteral Wood	ASNW
6	Longmead Shaw	ASNW
7	Hookshile Wood	ASNW

drawn date 17/06/26
drawn/chkd MB/HG

client
Wain Estates
project
Shermanbury Road,
Partridge Green

title
SITE LOCATION AND CONSULTATION
RESULTS PLAN - DESIGNATED SITES
scale 1:15,000 @ A3

number
FIGURE 1
rev -



- Key:
- Site Boundary
 - 1km Buffer
 - 2km Buffer

- Species results:
- Barbastelle
 - Brown Long-eared Bat
 - Common Pipistrelle
 - Daubenton's Bat
 - Barn Owl
 - Long-eared Bat species
 - Brown Hairstreak
 - Myotis Bat
 - Nathusius's Pipistrelle
 - Noctule
 - Pipistrelle
 - Serotine
 - Soprano Pipistrelle
 - Whiskered/Brandt's
 - Common Lizard
 - Grass Snake
 - Palmate Newt
 - Slow-worm
 - Red Kite
 - Stag Beetle

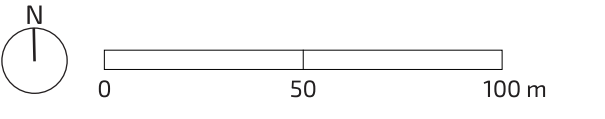
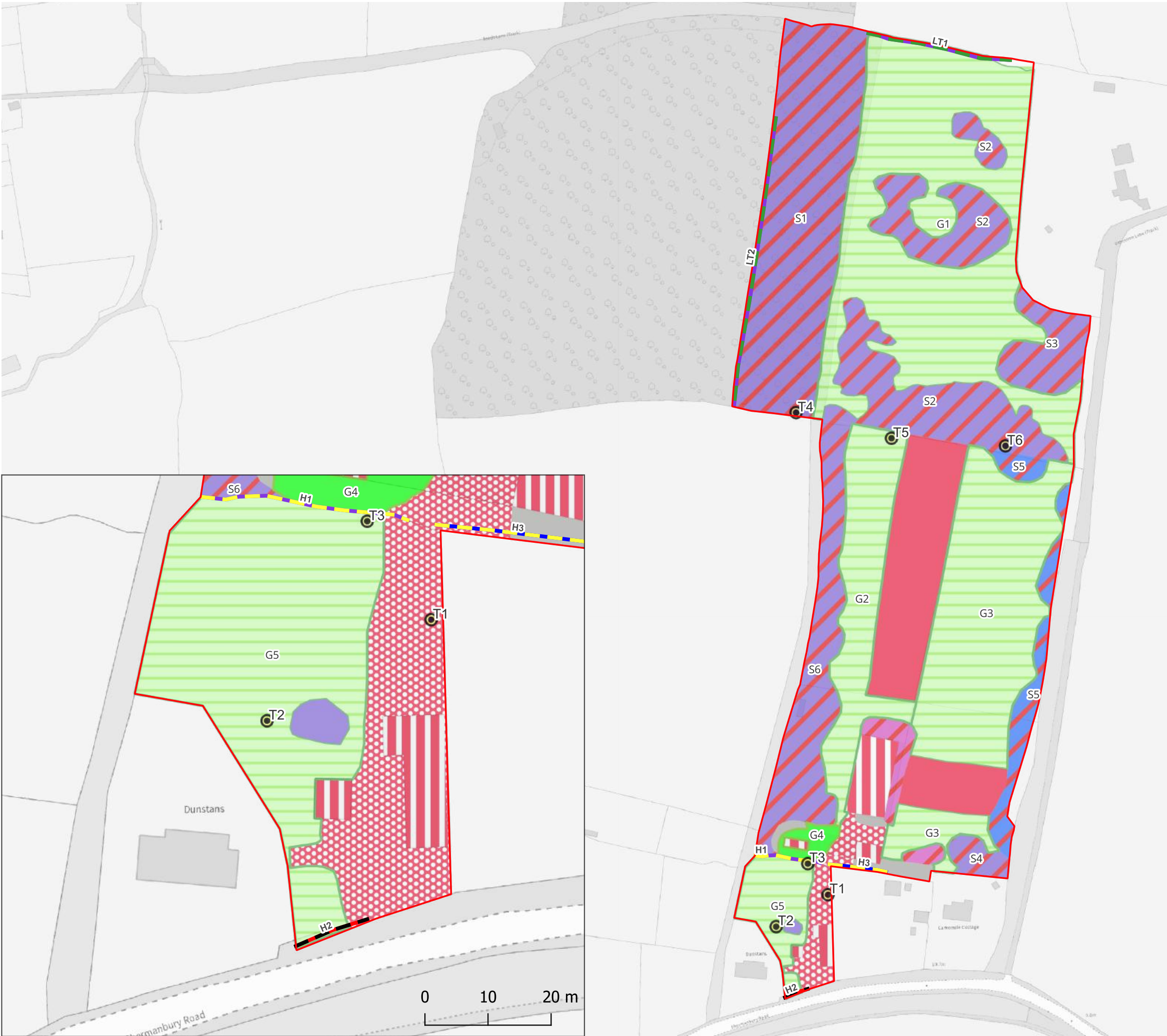
drawn date 17/06/26
client Wain Estates
project Shermanbury Road, Partridge Green

title SITE LOCATION AND CONSULTATION RESULTS PLAN - SPECIES RECORDS
scale 1:12,000 @ A3

number
rev

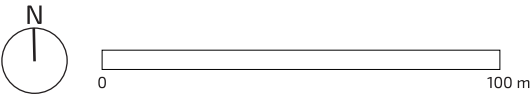
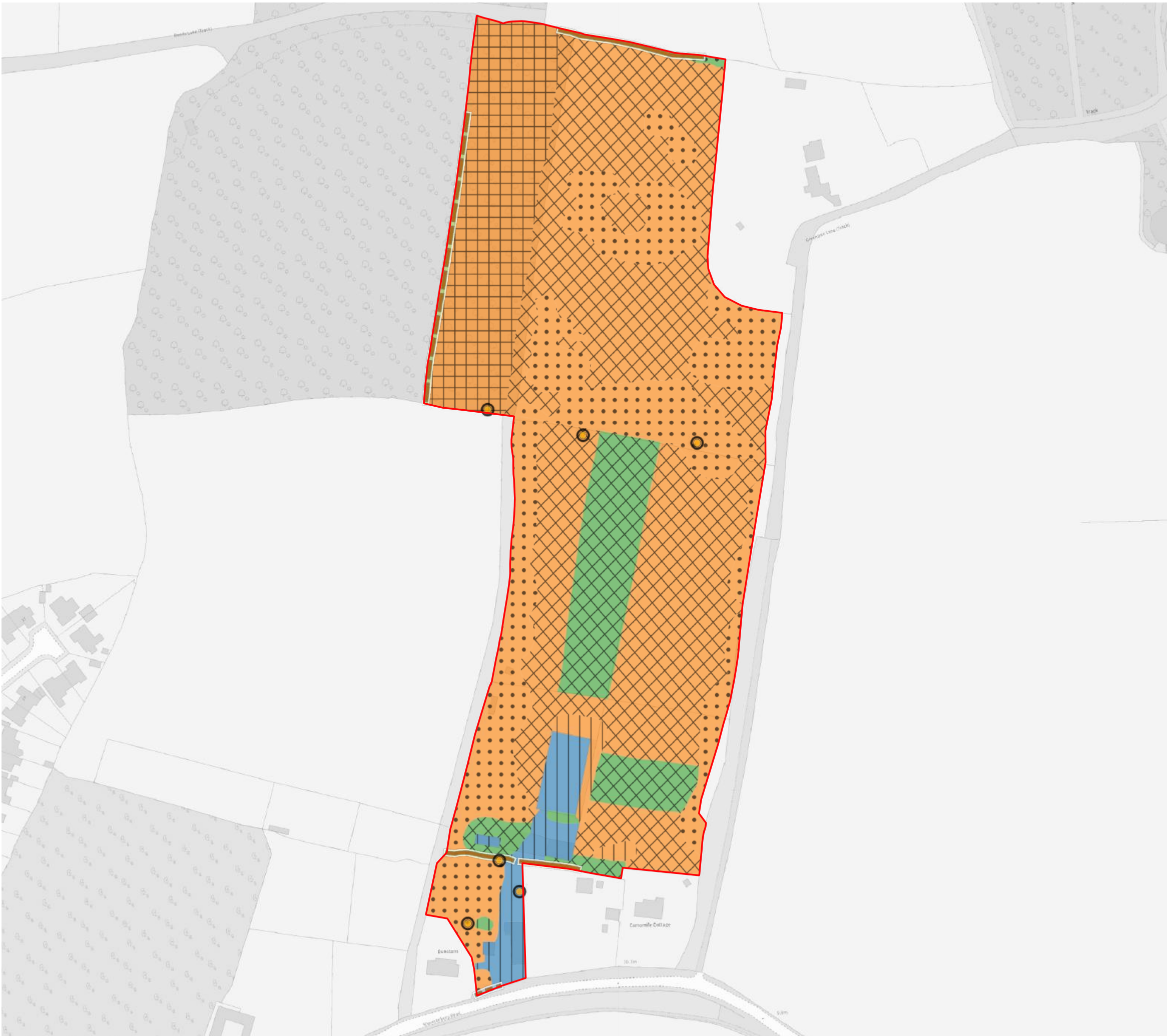
FIGURE 2

FPCR | environment & design



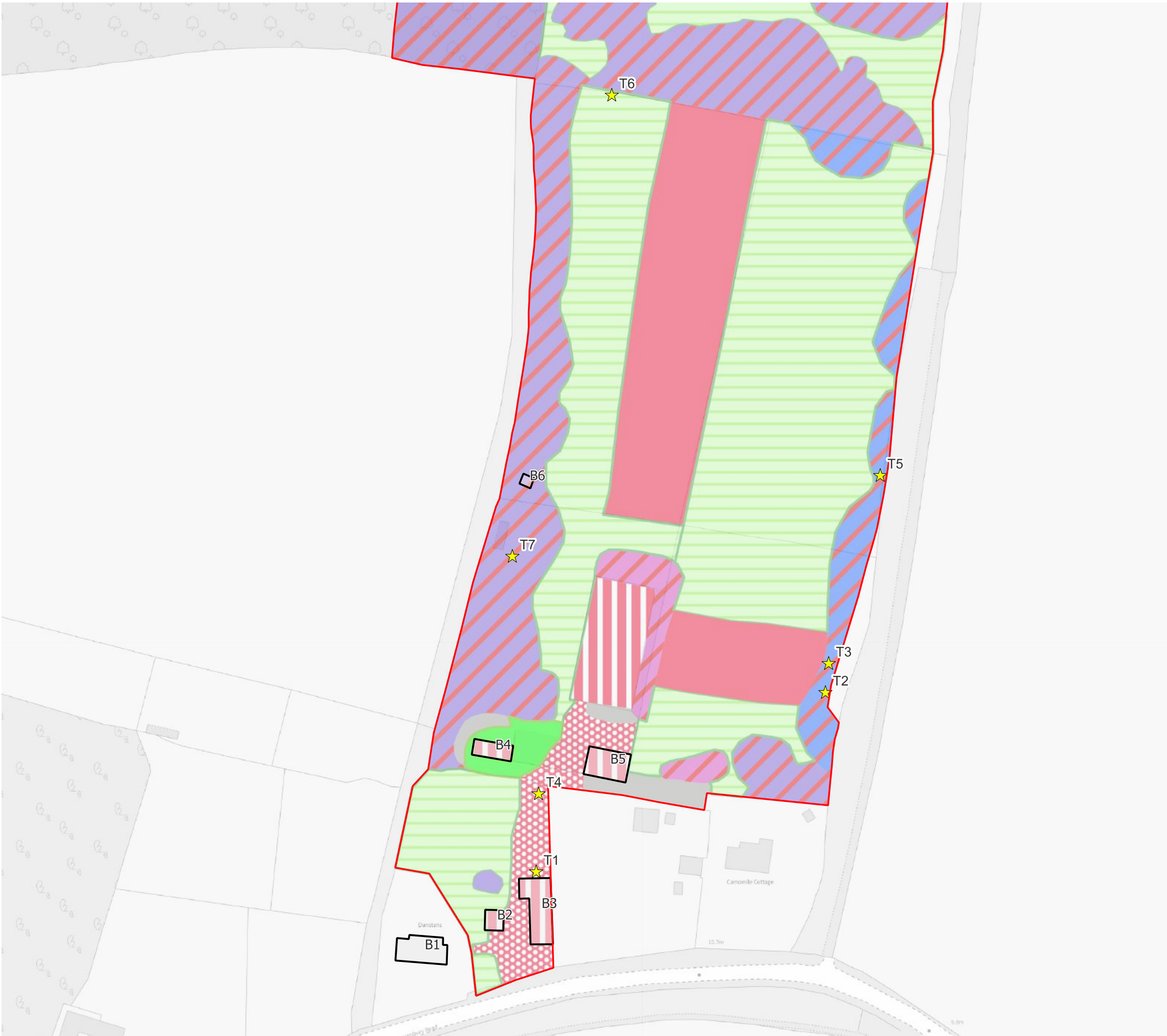
- Redline Boundary
- Baseline Habitats
 - Artificial unvegetated, unsealed surface
 - Blackthorn scrub
 - Bracken
 - Bramble scrub
 - Developed land; sealed surface
 - Introduced shrub
 - Mixed scrub
 - Modified grassland
 - Other neutral grassland
 - Ruderal/Ephemeral
 - Bare ground
- Baseline Hedgerow
 - Non-native and ornamental hedgerow
 - Line of trees
 - Native hedgerow
 - Native hedgerow - associated with bank or ditch
- Baseline Individual Trees
 - Existing very large rural tree

date	24/06/26	drwn/chkd	LM
client	Wain Estates		
project	Shermanbury Road, Partridge Green		
title	BASELINE HABITAT PLAN	scale	1:1,900 @ A3
number	FIGURE 3	rev	-



- Redline Boundary
- Baseline Habitat Condition
- Good
 - Moderate
 - Poor
 - N/A - Other
 - Condition Assessment N/A
- Baseline Habitat Distinctiveness
- Medium
 - Low
 - V.Low
- Baseline Hedgerow Condition
- Good
 - Moderate
 - Poor
- Baseline Hedgerow Distinctiveness
- Medium
 - Low
 - V.Low
- Baseline Individual Tree Condition
- Good
- Baseline Individual Tree Distinctiveness
- Medium

date	24/06/26	drwn/chkd	LM
client	Wain Estates		
project	Shermanbury Road, Partridge Green		
title	BASELINE HABITAT CONDITION AND DISTINCTIVENESS PLAN	scale	1:1,900 @ A3
number	FIGURE 4	rev	-



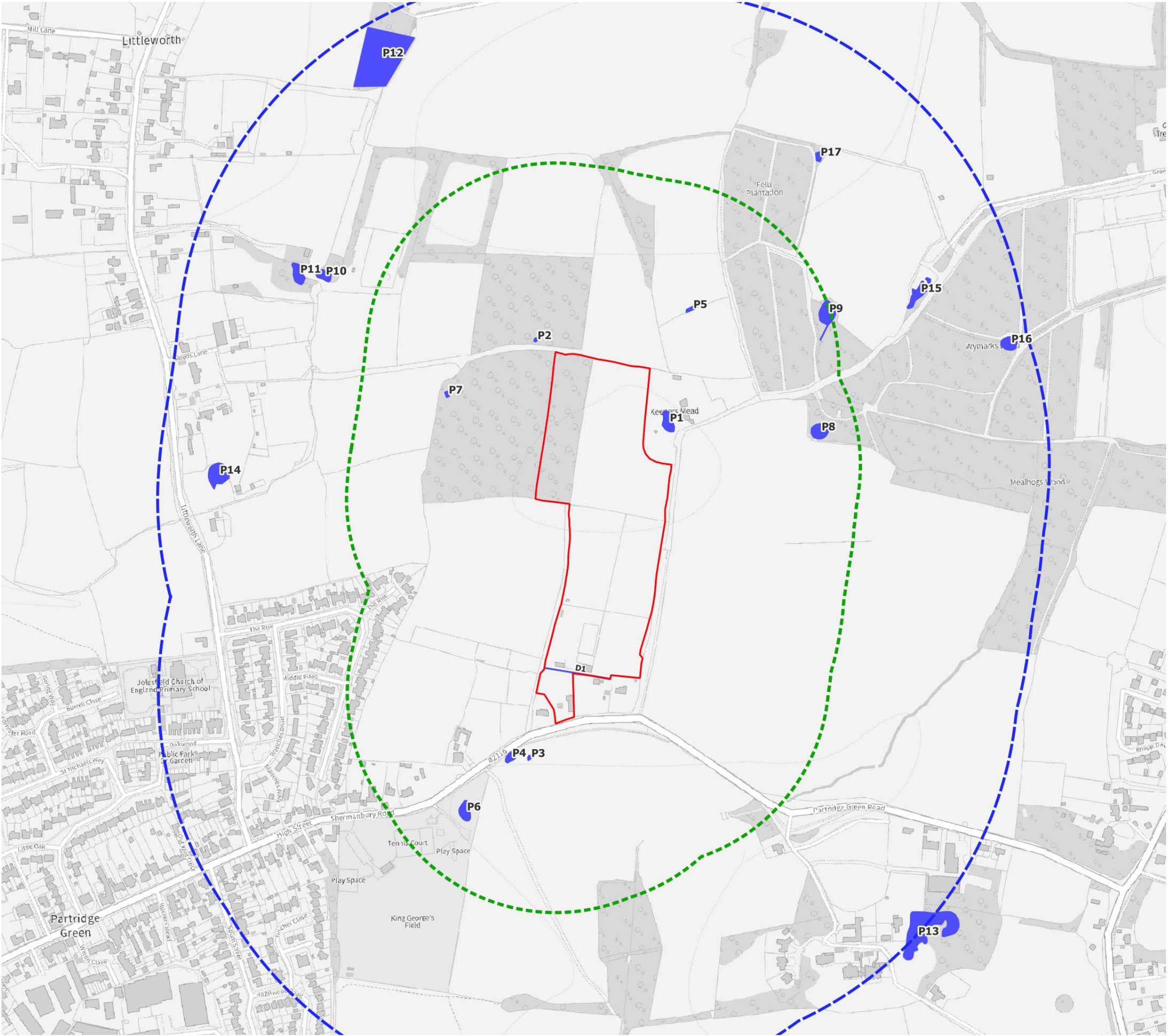
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- Site Boundary
- Buildings
- Trees with Potential Roost Features

date	24/06/26	drwn/chkd	HG
client	Wain Estates		
project	Shermanbury Road Partridge Green		
title	BUILDING LOCATIONS AND TREES WITH POTENTIAL ROOSTING FEATURES PLAN	scale	1:1,200 @ A3
number	FIGURE 5	rev	-



N

0100200 m

Site Boundary

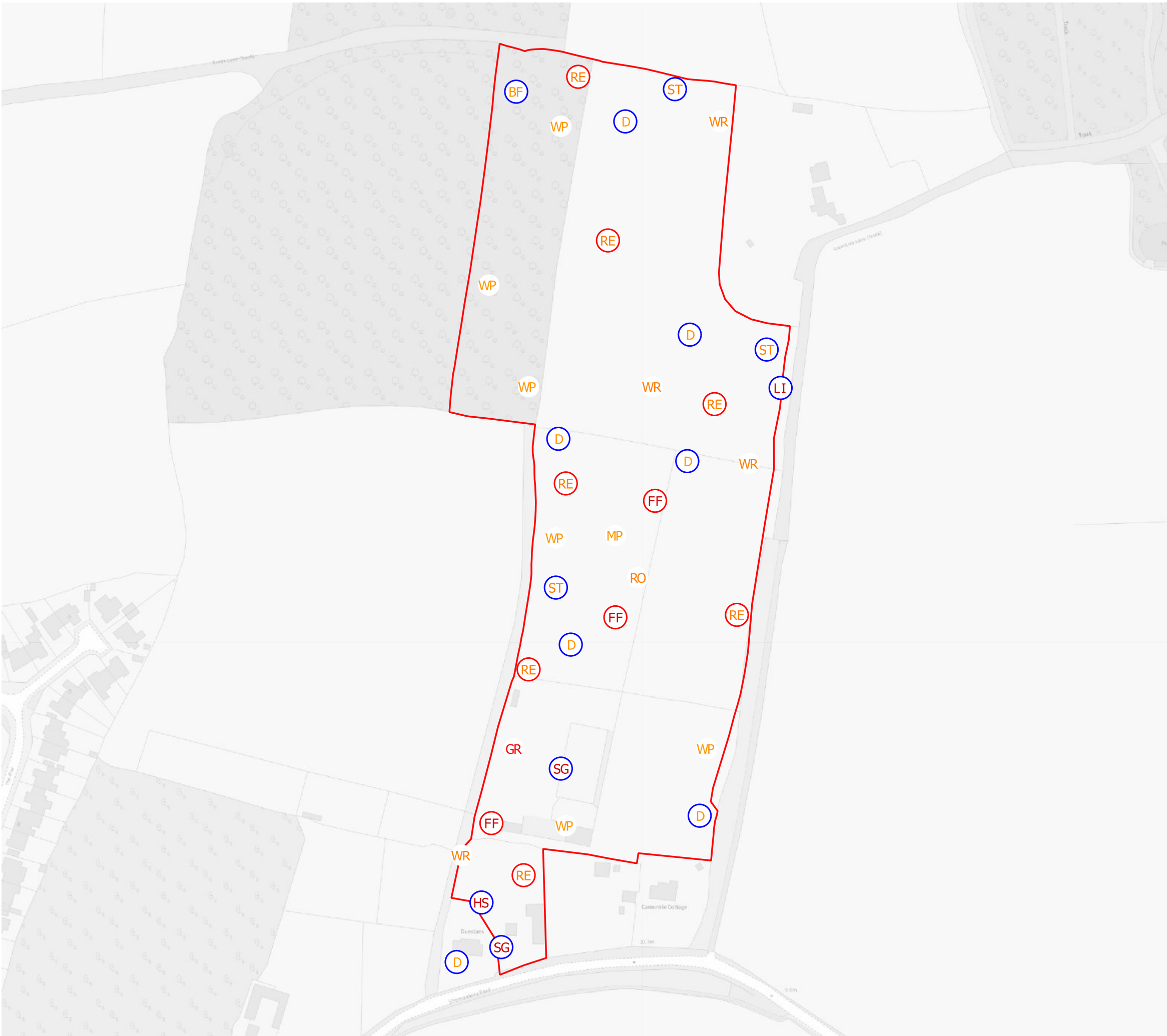
250m Buffer

500m buffer

Pond

Ditch

drawn date	24/06/26	drwn/chkd	MB/HG
client	Wain Estates		
project	Shermanbury Road, Partridge Green		
title	POND LOCATION PLAN	scale	1:5,000 @ A3
number	FIGURE 6	rev	-



N

0

50

100 m

Site Boundary

BoCC Red List Species

FF

Fieldfare

HS

House Sparrow

LI

Linnet

SG

Starling

GR

Greenfinch

BoCC Amber List Species

BF

Bullfinch

D

Dunnock

MP

Meadow Pipit

RE

Redwing

RO

Rook

ST

Song Thrush

WP

Woodpigeon

WR

Wren

Additional Protections

NERC Species of Principal Importance

Schedule 1 Species

drawn date	17/06/26	drwn/chkd	REM / HG
client	Wain Estates		
project	Shermanbury Road, Partridge Green		
title	WINTER BIRD SURVEY RESULTS PLAN - DISTRIBUTION OF NOTABLE SPECIES	scale	1:2,000 @ A3
number	FIGURE 7	rev	-



Key

- Redline Boundary
- Data Search (10 years) - Brown Hairstreak
- Survey Data - BH Egg Locations

BH Hedgerow Suitability

- Suitable (surveyed)
- Unsuitable

BH Habitat

- Blackthorn scrub
- Mixed scrub

drawn date	19/06/26	drwn/chkd	CHK
client	Wain Estates		
project	Shermanbury Road, Partridge Green		
title	BROWN HAIRSTREAK SURVEY PLAN	scale	1:2,000 @ A3
number	FIGURE 8	rev	-

APPENDIX A: RELEVANT LEGISLATION, POLICY AND GUIDANCE

The Conservation of Habitats and Species Regulations (CHSR) 2017 (as amended)

- 1.1 The CHSR ratifies into UK law the "Habitats Directive" (92/43/EEC) and the "Birds Directive" (79/409/EEC).

European Protected Sites

- 1.2 The CHSR places a duty on the Secretary of State to propose a list of sites which are important for species listed in Annex I and II of the Habitats Directive respectively to the European Commission. Once the Commission and EU Member States have agreed that the sites submitted are worthy of designation, they are identified as Sites of Community Importance (SCIs). The EU Member States must then designate these sites as Special Areas of Conservation (SACs) within six years.
- 1.3 The CHSR requires the compilation and maintenance of a register of European sites to include SACs as well as Special Protection Areas (SPAs) designated for birds. The SACs and SPAs under the CHSR are referred to as national site networks, Ramsar sites are of international importance and do not form part of the national site networks; but boundaries might overlap SAC and SPA designations.

European Protected Species

- 1.4 The CHSR includes a list of animals and plant species taken from the Annex IV of the Habitats Directive that have a natural range in Great Britain. These are collectively known as European Protected Species (EPS) and are listed in *Table 1*. The regulations make it an offence to deliberately capture, kill, disturb, take or destroy eggs of, or damage or destroy a breeding or resting place of animals listed in Schedule 2 of the Regulations, and to pick, collect, cut, uproot or destroy wild plants listed in Schedule 5 of the Regulations. They also protect these species alive or dead and parts thereof from various forms of possession and trade.
- 1.5 These actions may be made lawful in certain circumstances through the granting of licences by the appropriate authority (Natural England). Licences must only be granted after the appropriate authority is satisfied that no satisfactory alternatives are available. In most circumstances, licences are only applied for and granted following full planning permission.
- 1.6 In determining whether or not to grant a licence, Natural England must apply the requirements of the CHSR and, in particular, the three derogation tests:
 - Test 1: A licence can be granted for the purposes of "preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment".
 - Test 2: The appropriate authority shall not grant a licence unless they are satisfied "that there is no satisfactory alternative".
 - Test 3: The appropriate authority shall not grant a licence unless they are satisfied "that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range."

Table 1: The Habitats Regulations Schedule 2 and Schedule 5 species

	Common Name	Scientific Name
Schedule 2 – European Protected Animal Species	Horseshoe bats – all species	<i>Rhinolophidae</i>
	Bats – all species	<i>Vespertilionidae</i>
	Large blue butterfly	<i>Maculinea arion</i>
	Wild cat	<i>Felis silvestris</i>
	Dolphins, porpoises & whales – all species	<i>Cetacea</i>
	Hazel dormouse	<i>Muscardinus avellanarius</i>
	Pool frog	<i>Rana lessonae</i>
	Sand lizard	<i>Lacerta agilis</i>
	Fisher's estuarine moth	<i>Gortyna borelii lunata</i>
	Great crested newt	<i>Triturus cristatus</i>
	Otter	<i>Lutra lutra</i>
	Lesser Whirlpool Ram's-horn snail	<i>Anisus vorticulus</i>
	Smooth snake	<i>Coronella austriaca</i>
	Sturgeon	<i>Acipenser sturio</i>
	Natterjack toad	<i>Bufo calamita</i>
	Marine turtles	Caretta caretta Chelonia mydas Lepidochelys kempii Eretmochelys imbricata Dermochelys coriacea
Schedule 5 – European Protected Plant Species	Shore dock	<i>Rumex rupestris</i>
	Killarney fern	<i>Trichomanes speciosum</i>
	Early gentian	<i>Gentianella anglica</i>
	Lady's-slipper	<i>Cypripedium calceolus</i>
	Creeping marshwort	<i>Apium repens</i>
	Slender naiad	<i>Najas flexilis</i>
	Fen orchid	<i>Liparis loeselii</i>
	Floating-leaved water plantain	<i>Luronium natans</i>
	Yellow marsh saxifrage	<i>Saxifraga hirculus</i>

Wildlife and Countryside Act (WCA) 1981 (as amended)

- 1.7 The WCA 1981 (as amended) is the principal legislation providing protection for wildlife in the UK. It prescribes legislation for wild birds, other animals, wild plants and non-native species. In addition, it provides for the designation of Sites of Special Scientific Interest (SSSI) in England.

Wild birds

- 1.8 The WCA as amended by Schedule 12 of the Countryside and Rights of Way Act 2000 makes it an offence (with exception to species listed in Schedule 2) to intentionally or recklessly:

- kill, injure, or take any wild bird;
- take, damage or destroy the nest of any wild bird while that nest is in use or being built (also [take, damage or destroy the nest of a wild bird included in Schedule ZA1] under the Natural Environment and Rural Communities Act 2006); or
- take or destroy an egg of any wild bird.

- 1.9 For birds listed on Schedule 1 of the WCA, protection extends to offences relating to the intentional or reckless disturbance of these birds while at their nests or their dependent young.

Other animals

- 1.10 The WCA (as amended) makes it an offence to (subject to exceptions) intentionally or recklessly kill, injure or take wild animals listed on Schedule 5 of the Act. For some species, the protection extends to interference with places used for shelter or protection, or disturbing animals occupying or obstructing access to such places. These species are regarded as “fully protected” and as well as the EPS species listed above include the mammal species water vole *Arvicola terrestris*, pine marten *Martes martes* and red squirrel *Sciurus vulgaris* as well as selected others from a range of species groups including, fish, butterflies, hemipteran bugs, beetles, crickets, dragonflies, moths, spiders, crustaceans, sea-mats, molluscs, Annelid worms and sea anemones (and allies).
- 1.11 There are seven species on Schedule 5 of the Act that not fully protected but are still protected against killing and injuring these include the common reptile species slow worm *Anguis fragilis*, viviparous lizard *Lacerta vivipara*, grass snake *Natrix natrix* and adder *Vipera berus*.
- 1.12 The Act prohibits certain methods of killing, injuring, or taking wild animals, and numerous species are protected against sale only as well as other variations for example Atlantic stream (white-clawed) crayfish *Austropotamobius pallipes* are protected against taking and sale.

Vascular plants, bryophytes, lichens and fungi

- 1.13 With regards to native flora the Act makes it an offence to (subject to exceptions) intentionally or recklessly pick, uproot or destroy any wild plant listed in Schedule 8. Similarly, the Act prevents the sale, offer or expose for sale, or possess (for the purposes of trade), any live or dead wild plant included in Schedule 8, or any part of, or anything derived from, such a plant.

Non-native species

- 1.14 The Act contains measures for preventing the establishment of non-native species which may be detrimental to native wildlife, prohibiting the release of animals and planting of plants listed in Schedule 9 in England and Wales.

Sites of Special Scientific Interest

- 1.15 The Act provides for the notification and confirmation of Sites of Special Scientific Interest (SSSIs). These sites can be identified for their flora, fauna, geological or physiological interest. In England, the power to confirm an SSSI lies with Natural England.
- 1.16 Laws protecting areas designated as SSSIs are described in Sections 28 to 33 of Part 2 of the Wildlife and Countryside Act 1981 (as amended). SSSIs are the principle statutory designation of sites in the UK and offences are enforced through Natural England. Offences include the following:

SSSI owners and occupiers

- carrying out, causing or allowing operations likely to damage an SSSI without Natural England consent.
- failing to keep to a management notice.
- failing to let us know about a change in ownership or occupation of land in an SSSI.

Public bodies

- carrying out or authorising operations likely to damage an SSSI without meeting the requirements to notify Natural England.

- failing to minimise any damage to an SSSI and if there is any damage, failing to restore it to its former state so far as is reasonably practical and possible.

Any person

- intentionally or recklessly damaging, destroying or disturbing any of the habitats or features of an SSSI.
- intentionally or recklessly damaging, destroying, obscuring or taking down a site notice put up on land within an SSSI.
- preventing a Natural England officer lawfully accessing an SSSI.

Environment Act 2021

- 1.17 The act was passed on 10th November 2021 and covers a range of environmental protections and enhancements. It is enforced by an independent Office for Environmental Protection (OEP). In relation to nature and biodiversity, the act will deliver:

- Strengthened biodiversity duty
- A requirement for developments to deliver at least 10% biodiversity net gain
- Local Nature Recovery Strategies
- Protected Site Strategies and Species Conservation Strategies
- Conservation Covenants
- Strengthened woodland protection enforcement measures

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Natural Environmental and Rural Communities (NERC) Act 2006

- 1.20 Section 40 of the NERC Act 2006 imposes a duty on every public authority to conserve biodiversity in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.

- 1.21 Section 41 (S41) of the NERC Act 2006 requires the Secretary of State to publish a list of habitats and species that are of principal importance for the conservation of biodiversity in England. The list (including 56 habitats and 943 species) has been drawn up in consultation with Natural England and draws upon the UK BAP List of Priority Species and Habitats. The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the Natural Environment and Rural Communities Act 2006.

National Planning Policy Framework (NPPF) 2024

- 1.22 The National Planning Policy Framework (NPPF) sets out the Government's planning policy for England. As such, the NPPF must be a material consideration for local authorities when considering planning decisions. The following relate to ecology/biodiversity:

Policy 15 – Conserving and enhancing the natural environment

187. 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 possible;*
- 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;*
- 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*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

188. 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 Framework; 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.

189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, 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 Broads. 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 impacts on the designated areas.

190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development 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.*

191. 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.

192. To protect and enhance biodiversity and geodiversity, plans should:

- a) 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 and 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.*

193. 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 incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.*

194. *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 Area of Conservation, and listed or proposed Ramsar sites.*

195. *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.*

Horsham District Planning Framework contains the following relevant policies:

Policy 25: Strategic Policy: The Natural environment and Landscape Character

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:

1. 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.
2. Maintain and enhances the Green Infrastructure Network and addresses any identified deficiencies in the District.
3. 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.
4. Conserve and where possible enhance the setting of the South Downs National Park.

Policy 31: 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)
 - 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.

APPENDIX B: SITE PHOTOGRAPHS



Photo 1: Modified grassland, scrub and public footpath through northern extent of the Site



Photo 2: Mixed scrub habitat in the northern extent of the site



Photo 3: Unmanaged grassland in the northern extent of the site



Photo 4: Grazed modified grassland



Photo 5: Blackthorn scrub



Photo 6: Horse-grazed fields



Photo 7: Ditch



Photo 8: Area of hardstanding – previously used for horses



Photo 9: Garden of B1



Photo 10: Southern side of Hedgerow



Photo 11: Suitable habitat for brown hairstreak



Photo 12: Suitable habitat for brown hairstreak



Photo 13: Brown hairstreak egg 25/02/2026



Photo 14: Brown hairstreak egg 25/02/2026

Client:
13658, David Harper, FPCR Environment and Design
1040091-FPCR-TL, 13658, version 1



RSK ADAS Ltd
Spring Lodge
172 Chester Road
Helsby
WA6 0AR

Tel: 01159 229249
Email: Helen.Rees@adas.co.uk

www.adas.uk

Sample ID: ADAS-12350

Client Identifier: P12

Grid references/coordinates: TQ1952620330

Description: pond water samples in preservative

Condition on Receipt: Good

Date of Receipt : 05/05/2026

Volume: Passed

Determinant	Result	Method	Date of Analysis
Inhibition Control [†]	2 of 2	Real Time PCR	18/05/2026
Degradation Control [§]	Within limits	Real Time PCR	18/05/2026
Great Crested Newt*	0 of 12 (negative)	Real Time PCR	18/05/2026
Negative PCR Control (Nuclease Free Water)	0 of 4	Real Time PCR	As above for GCN
Positive PCR Control (GCN DNA 10 ⁻⁴ ng/μL) [#]	4 of 4	Real Time PCR	As above for GCN

Date of preparation: 19/05/2026

Date of issue: 19/05/2026

eDNA analysis was carried out in accordance with the stipulated methodology found in the Technical Advice Note (WC1067 Appendix 5 Technical Advice Note) published by DEFRA and adopted by Natural England.

** If all PCR controls and extraction blanks give the expected results a sample is considered: negative for GCN if all of the replicates are negative; positive for GCN if one or more of the replicates are positive.*

[†] Recorded as the number of positive replicate reactions at expected C_t value. If the expected C_t value is not

[§] No degradation is expected within time frame of kit preparation, sample collection and analysis.

[#] Additional positive controls (10⁻¹, 10⁻², 10⁻³ ng/μL) are also routinely run, results not shown here.

Appendix 1: Interpretation of results

Sample Condition

Upon sample receipt we score your samples according to quality: good, low sediment, medium sediment, high sediment, white precipitate, and presence of algae.

There are three reasons as to why sediment should be avoided:

1. It is possible for DNA to persist within the sediment for longer than it would if it was floating in the water which could lead to a false positive result i.e. in this case GCN not recently present but present a long time ago
2. In some cases sediment can cause inhibition of the PCR analysis used to detect GCN eDNA within samples which could lead to an indeterminate result.
3. In some cases sediment can interfere with the DNA extraction procedure resulting in poor recovery of the eDNA which in turn can lead to an indeterminate result.

Algae can make the DNA extraction more difficult to perform so if it can be avoided then this is helpful.

Sometimes samples contain a white precipitate which we have found makes the recovery of eDNA very difficult. This precipitate can be present in such high amounts that it interferes with the eDNA extraction process meaning that we cannot recover the degradation control (nor most likely the eDNA itself) at sufficient levels for the control to be within the acceptable limits for the assay, therefore we have to classify these type of samples as indeterminate.

What do my results mean?

A positive result means that great crested newts are present in the water or have been present in the water in the recent past (eDNA degrades over around 7-21 days).

A negative result means that DNA from the great crested newt has not been detected in your sample.

On occasion an inconclusive result will be issued. This occurs where the DNA from the great crested newt has not been detected but the controls have indicated that either: the sample has been degraded and/or the eDNA was not fully extracted (poor recovery); or the PCR inhibited in some way. This may be due to the water chemistry or may be due to the presence of high levels of sediment in samples which can interfere with the DNA extraction process. A re-test could be performed but a fresh sample would need to be obtained. We have successfully performed re-tests on samples which have had high sediment content on the first collection and low sediment content (through improved sample collection) on the re-test. If water chemistry was the cause of the indeterminate then a re-test would most likely also return an inconclusive result.

The results will be recorded as indeterminate if the GCN result is negative and the degradation result is recorded as:

1. evidence of decay - meaning that the degradation control was outside of accepted limits
2. evidence of degradation or residual inhibition - meaning that the degradation control was outside of accepted limits but that this could have been due to inhibitors not being removed sufficiently by the dilution of inhibited samples (according to the technical advice note)