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| <b>Site:</b>           | Billingshurst                                         |
| <b>Client:</b>         | Highwood Ventures 5 Limited and Vivid Housing Limited |
| <b>Job Number:</b>     | 784-B031362                                           |
| <b>Date of Report:</b> | 29/06/2025                                            |

| Document Control                                                                                                                                                           |    |                                                                                                                                                                                    |             |
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| <b>Revision:</b>                                                                                                                                                           | V2 | <b>Status:</b>                                                                                                                                                                     | Final issue |
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## Appendix 9.1I: Ecology Survey Data Validity

### Background

This letter seeks advice on behalf of Highwood regarding LPA and Place Services' support for ecological data for a mixed used development of up to 1100 houses and associated infrastructure. Associated infrastructure will include, but is not limited to: all accesses, sports provision, care provision, 2FE primary school, community centre, and country park in Billingshurst, Horsham District Council and should be read in conjunction with ES Scoping Chapter: Biodiversity and ECIA: Receptors Scoped Out documents.

Highwood aims to confirm the validity of surveys from 2022-2023 and updated assessments from May-June 2025. The planning application is set for Autumn 2026 as such to ensure that there is no delay to the upcoming planning application, we would like confirmation and discussion that the level of survey effort undertaken, and its validity would be sufficient to support the application without the need of duplicating survey effort.

## Ecological Surveys

A suite of ecological surveys were conducted during 2022 and 2023 with some updated in 2025. Further details are included in ES Scoping Chapter: Biodiversity and ECIA: Receptors Scoped Out documents..

These included:

- **UK Hab:** A previous UK Hab and condition assessment survey was carried out in 2023, a Biodiversity Net Gain (BNG) assessment used version 4.0, to assess potential gains based on the masterplan. An updated UK Hab survey and condition assessment has been carried out in 2025 and found sites to be broadly the same with the site dominated by arable fields as well as cattle graze pasture. The 2025 data will be used to inform a BNG assessment using the Statutory Metric.
- **Advanced bat surveys:** Due to the site's proximity to The Mens SAC, of international importance for bats, the site underwent advanced surveys. Bat trapping recorded common and soprano pipistrelle, brown long-eared, and whiskered bats, but no high conservation species
- **Bat activity surveys** identified seven species, with the site identified as not crucial for Barbastelle bats linked to The Mens SAC. No bat roosts were found in the clubhouse.
- **Bat roosting survey:** of trees and buildings on site which are scheduled to be impacted have been resurveyed in 2025 with no evidence of roosting bats identified.
- **Dormouse surveys** found three nests, with suitable habitats being retained, protected and connectivity enhanced as part of the development proposals.
- **Breeding bird surveys** recorded typical farmland/woodland edge birds, including red-listed species, with habitat enhancements planned.
- **Great Crested Newt (GCN)** surveys found two positive eDNA waterbodies, but likely absence was assumed in other ponds due to dry conditions.
- **Reptile surveys** recorded common lizard and grass snake, with habitats retained and enhanced.

## Site Habitats and proposals

The site, mainly arable land, offers many opportunities for biodiversity improvements.

Residential areas will be within these fields, and various measures will protect and enhance biodiversity.

New and better-connected habitats like woodland, higher distinctiveness grassland, ponds, and hedgerows has the potential to support a broader range of notable and protected species.

Existing habitats such as the River Arun to the west of the site will be kept as 'dark corridors' without artificial light, providing pathways for nocturnal species like bats. This will create a connected network of natural habitats and area of Flood plain grazing marsh will also be retained and enhanced.

Overall, the proposals will increase habitats for protected species and improve connectivity across the site.

### **Data validity**

The CIEEM's advice note "On the Lifespan of Ecological Reports and Surveys"<sup>1</sup> was used to assess the validity of the survey data for this project. By the time the planning application is submitted, most data will be beyond its typical shelf life (Figure 1), as the surveys were conducted during the site promotion phase. This phase allowed for significant feedback to be incorporated into the project design, minimizing ecological impacts, with the development primarily affecting arable fields.

An updated UKHAB survey in May 2025 recorded similar habitats and conditions as previous surveys. Based on professional opinion, except for updated bat roosting and badger surveys to be conducted in 2025, additional protected species surveys are unlikely to be necessary. The proposals avoid most important habitats, which remain largely unchanged. For less mobile species like great crested newts, reptiles, and dormice, updated habitat suitability assessments can be included in the impact assessment to ensure appropriate mitigation.

### **Conclusion**

The LPA should therefore be satisfied that the survey data although outside of typical shelf life is still valid because there have been no significant changes to the site's habitats or their conditions, the surveys were conducted in the appropriate season, the majority of sensitive features have been avoided, standard methodologies were used, and the data has been reviewed or updated if it is nearing the end of its validity. This ensures the ecological data remains reliable for planning decisions.

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<sup>1</sup> Chartered Institute of Ecology and Environmental Management (CIEEM). (2019). Advice Note on the Lifespan of Ecological Reports & Surveys. Retrieved from <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>.

**Figure 1: Exerpt from CIEEM Advice Note on the Life Span of Ecological Reports & Surveys**

| AGE OF DATA          | REPORT / SURVEY VALIDITY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| Less than 12 months  | Likely to be valid in most cases.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 12-18 months         | <p>Likely to be valid in most cases with the following exceptions:</p> <ul style="list-style-type: none"> <li>• Where a site may offer existing or new features which could be utilised by a mobile species within a short timeframe (see scenario 1 example);</li> <li>• Where a mobile species is present on site or in the wider area, and can create new features of relevance to the assessment (see scenario 2 example);</li> <li>• Where country-specific or species-specific guidance dictates otherwise.</li> </ul> <p>Report authors should highlight where they consider it likely to be necessary to update surveys within a timeframe of less than 18 months.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 18 months to 3 years | <p>A professional ecologist will need to undertake a site visit and may also need to update desk study information (effectively updating the Preliminary Ecological Appraisal) and then review the validity of the report, based on the factors listed below. Some or all of the other ecological surveys may need to be updated. The professional ecologist will need to issue a clear statement, with appropriate justification, on:</p> <ul style="list-style-type: none"> <li>• The validity of the report;</li> <li>• Which, if any, of the surveys need to be updated; and</li> <li>• The appropriate scope, timing and methods for the update survey(s).</li> </ul> <p>The likelihood of surveys needing to be updated increases with time, and is greater for mobile species or in circumstances where the habitat or its management has changed significantly since the surveys were undertaken. Factors to be considered include (but are not limited to):</p> <ul style="list-style-type: none"> <li>• Whether the site supports, or may support, a mobile species which could have moved on to site, or changed its distribution within a site (see scenario 1&amp;2 examples);</li> <li>• Whether there have been significant changes to the habitats present (and/or the ecological conditions/functions/ecosystem functioning upon which they are dependent) since the surveys were undertaken, including through changes to site management (see scenario 3 example);</li> <li>• Whether the local distribution of a species in the wider area around a site has changed (or knowledge of it increased), increasing the likelihood of its presence (see scenario 4 example).</li> </ul> |
| More than 3 years    | The report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated (subject to an assessment by a professional ecologist, as described above).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |