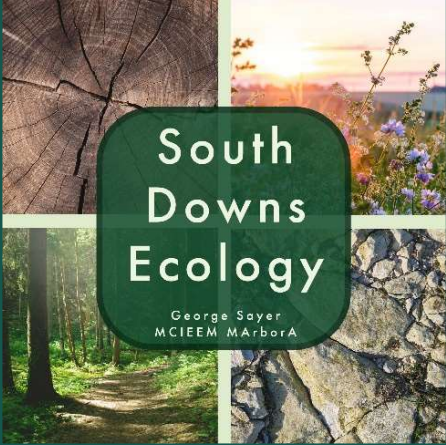


**Ecological Impact  
Assessment**

**1 Halfrey Road,  
Fishbourne**



**South  
Downs  
Ecology**

George Sayer  
MCIEEM MARBORA

# Ecological Impact Assessment

1 Halfrey Road, Fishbourne

Version 1 – 21<sup>st</sup> December 2023

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### *Summary*

Mr Woodward has commissioned a Preliminary Ecological Appraisal, Preliminary Bat Roost Assessment and Ecological Impact Assessment of proposals for alterations at 1 Halfrey Road, Fishbourne (SU 83590 05369, hereafter referred to as 'the site'). A Preliminary Ecological Appraisal, Preliminary Bat Roost Assessment and Phase 1 Habitat Survey of the site was carried out on the 18<sup>th</sup> December 2023.

The proposal area consists of existing building and sealed surfaces, of negligible ecological value, surrounded by garden habitats of low value.

The proposals are for alteration and extension of the existing dwelling.

The proposals are not anticipated to have any significant impact upon ecology; the habitats proposed for removal offer no significant potential for protected species. The dwelling overall offers 'negligible' bat roost potential and the proposals offer negligible risk of disturbing or harming bats.

When mitigation and enhancements have been taken into account, the proposals are not considered to have a negative impact upon designated sites, habitats or protected species in accordance with planning policy and once enhancements are considered, would result in a minor net gain. The proposals would therefore accord with the relevant Chichester Local Plan Policies.

## 1.0 Introduction

- 1.1 Mr Woodward has commissioned a Preliminary Ecological Appraisal, Preliminary Bat Roost Assessment and Ecological Impact Assessment of proposals for alterations at 1 Halfrey Road, Fishbourne (SU 83590 05369, hereafter referred to as 'the site'). A Preliminary Ecological Appraisal, Preliminary Bat Roost Assessment and Phase 1 Habitat Survey of the site was carried out on the 18th December 2023.
- 1.2 The following ecological impact assessment report has been completed by George Sayer (*BSc (Hons) Environmental Sciences, PgDip Endangered Species Recovery, MArborA, MCIEM, NE Licence Holder – Bats Level 2 and GCN - Ecologist*). This appraisal consisted of a site visit to identify existing habitats on site; the habitats have been categorised broadly following the UK Habitats Classification Guidance V2.01 (*UKHabs Ltd 2023*). In addition, an assessment of habitats and structures on the site was made to determine their potential for protected species. Following this an on-site and desktop assessment was undertaken, of the likelihood of National or European Protected Species being present on or near site, and the constraints these may pose on the development proposals.
- 1.3 Based on the results of the appraisal, recommendations for potential ecological enhancements have been provided.

### Site Description and Surrounding Area

- 1.4 The site consists of a small, detached bungalow, driveway and gardens, surrounded by other small detached residential dwellings to all aspects, with Halfrey Road to the north.
- 1.5 The site lies in the centre of the residential area of Fishbourne, west of Chichester. The immediate surroundings are all residential, with arable land to the surroundings. To the north past the A27 lie paddocks and areas of woodland whilst to the south are the coastal habitats of Apuldram and the Chichester Harbour Area of Outstanding Natural Beauty.

### Proposals

- 1.6 The proposals are for alterations to the dwelling to create rooms in the roof, and a rear single-storey extension. The proposals would involve the conversion of the loft.

## 2.0 Scope of Appraisal

1. *Identify habitats or features which may have potential for protected species;*
2. *Identify whether any signs of protected species are present on-site;*
3. *Recommend whether further surveys are required, or whether there are any relevant constraints with regards to protected species;*
4. *Identify impacts of the proposed development and set out appropriate avoidance, mitigation and compensation measures;*
5. *Provide suggestions as to how the site and proposals could be enhanced with regards to protected species and habitats.*

- 2.1 This appraisal and assessment is deemed to be relevant for a maximum of 18 months due to the possibility of changes in the habitats on-site. Should the site or proposals alter, the ecologist should be consulted to confirm that the appraisal is still valid.

### 3.0 Planning Policy and Legislation

#### National Planning Policy

- 3.1 The National Planning Policy Framework (NPPF) 2023 sets out the government planning policies for England and how they should be applied. 'Chapter 15: Conserving and Enhancing the Natural Environment' states that development should be 'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'
- 3.2 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

#### Local Planning Policy

- 3.3 The site is within the Chichester District; the Chichester Local Plan 2021 – 2039 is currently at Regulation 19 and as such, proposals shall be assessed against the currently adopted *Chichester District Local Plan – Key Policies 2014-2029*.
- 3.4 Policy 49 covers Biodiversity; the following criteria must be met for planning applications to be supported:
1. *The biodiversity value of the site is safeguarded;*
  2. *Demonstrable harm to habitats or species which are protected or which are of importance to biodiversity is avoided or mitigated;*
  3. *The proposal has incorporated features that enhance biodiversity as part of good design and sustainable development;*
  4. *The proposal protects, manages and enhances the District's network of ecology, biodiversity and geological sites, including the international, national and local designated sites (statutory and non-statutory), priority habitats, wildlife corridors and stepping stones that connect them;*
  5. *Any individual or cumulative adverse impacts on sites are avoided;*
  6. *The benefits of development outweigh any adverse impact on the biodiversity on the site. Exceptions will only be made where no reasonable alternatives are available; and planning conditions and/or planning obligations may be imposed to mitigate or compensate for the harmful effects of the development.*

- 3.5 Policy 50 covers Development and Disturbance of Birds in Chichester and Langstone Harbours Special Protection Areas. It states that “It is Natural England’s advice that all net increases in residential development within the 5.6km ‘Zone of Influence’ are likely to have a significant effect on the Chichester and Langstone Harbours SPA either alone or in-combination with other developments and will need to be subject to the provisions of Regulation 61 of the Conservation of Habitats and Species Regulations 2017. In the absence of appropriate avoidance and/or mitigation measures that will enable the planning authority to ascertain that the development would not adversely affect the integrity of the SPA, planning permission will not be granted because the tests for derogations in Regulation 62 are unlikely to be met. Furthermore, such development would not have the benefit of the presumption in favour of sustainable development in the National Planning Policy Framework.
- 3.6 Net increases in residential development, which incorporates appropriate avoidance/mitigation measures, which would avoid any likelihood of a significant effect on the SPA, will not require an ‘appropriate assessment’. Appropriate avoidance/mitigation measures will comprise:
- a) A contribution in accordance with the joint mitigation strategy outlined in Phase III of the Solent Disturbance and Mitigation Project; or
  - b) A developer provided package of measures associated with the proposed development designed to avoid any significant effect on the SPA; or
  - c) A combination of measures in (a) and (b) above.
- 3.7 Avoidance/mitigation measures will need to be phased with development and shall be maintained in perpetuity. All mitigation measures in (a), (b) and (c) above must be agreed to be appropriate by Natural England. They should also have regard to the Chichester Harbour AONB Management Plan. The provisions of this policy do not exclude the possibility that some residential schemes either within or outside the Zone of Influence might require further assessment under the Habitats Regulations. For example, large schemes, schemes proposing bespoke avoidance/mitigation measures, or schemes proposing an alternative approach to the protection of the SPAs. Such schemes will be assessed on their own merits, and subject to advice from Natural England.”
- 3.8 The emerging Chichester Local Plan 2021-2039: Proposed Submission (Regulation 19) includes the following policies; these should be given appropriate weight.
- *Policy NE4 Strategic Wildlife Corridors*
  - *Policy NE5 Biodiversity and Biodiversity Net Gain*
  - *Policy NE6 Chichester’s Internationally and Nationally Designated Habitats*
  - *Policy NE7 Development and Disturbance of Birds in Chichester and Langstone Harbours, Pagham Harbour, Solent and Dorset Coast Special Protection Areas and Medmerry Compensatory Habitat*
  - *Policy NE8 Trees, Hedgerows and Woodlands*

3.9

3.10 The South Downs National Park Authority released a Technical Advice Note (TAN) in January 2022 detailing how proposals should seek to enhance ecology.

#### Legislation

3.11 Legislation relating to wildlife and biodiversity of particular relevance to this EclA includes:

- The Conservation of Habitats and Species Regulations 2017;
- The Wildlife and Countryside Act 1981 (as amended);
- The Natural Environment and Rural Communities (NERC) Act 2006;
- The Protection of Mammals Act 1996.

3.12 All species of bat and their roosts are protected under The Conservation of Habitats and Species Regulations 2017 and The Wildlife and Countryside Act 1981. It is an offence to intentionally kill, injure or handle a bat, to possess a bat (live or dead), disturb a roosting bat, or sell or offer a bat for sale without a licence. It is also an offence to damage, destroy or obstruct access to any place used by bats for shelter, whether they are present or not.

3.13 All UK bird species are protected against disturbance whilst occupying a nest under the Wildlife and Countryside Act 1981. Developments that could predictably disturb, kill or injure nesting birds could result in an offence. Furthermore, a number of bird species are targets of UK and Local Biodiversity Action Plans and listed as Species of Principle Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. This obligates local authorities to have regard to the purpose of conserving biodiversity with particular emphasis on targeted species.

3.14 All other mammals receive general protection against cruelty, inhumane killing or injuring under the Protection of Mammals Act 1996.



## 4.0 Methodology

### Desktop Study

- 4.1 A desktop study was conducted using the government 'MAGIC' Map GIS tool; a search was carried out for all international statutory designated sites (Ramsar, SAC, SPA) within 12.0 km of the site; national statutory designated sites (SSSI, NNR, LNR) within 2.0 km of the site; and non-statutory designated sites (SNCI) and priority habitats within 1.0 km of the site. These have been summarized below and their significance considered in the context of the development proposals. A search was also carried out to identify features of ecological interest in the area, such as water bodies and ancient woodland. Given the overall scale and nature of the site and the proposals, a full data search from SxBRC was not considered appropriate. This is in accordance with CIEEM current guidance for such projects.

### Site Visit

- 4.2 A site visit was conducted on 18<sup>th</sup> December, during suitable weather (10 degrees, wind force 0; 8/8 cloud, dry). Habitats were recorded according to the UK-Habs Classification System as described within the UK Habitats Manual, V2.01 (UKHabs Ltd. 2023).
- 4.3 During the survey any constraints with regard to protected species were considered; the site was considered for their potential for protected species even when signs of these species were not noted at the time of survey.
- 4.4 The building was assessed internally and externally by an experienced, licenced bat surveyor (George Sayer 2018-34434-CLS) for its potential to hold roosting bats; roof voids were assessed where relevant, and access points identified. Any evidence of bats such as grease marks, bat droppings, urine splashes were noted. Trees were inspected for features conducive to bat and bird roosting, including knot holes, limb failures, cavities and heavy ivy cover; any identified bird nests have been recorded. The bat roost assessment was conducted following the recent Bat Conservation Trust - Bat Surveys for Professional Ecologists: Good Practice Guidelines (2023).
- 4.5 Due to the site visit being carried out over one day, it is possible that some signs of protected species may not be apparent within this short timeframe. This is a constraint recognised within best practice guidelines and all reasonable effort has been made to identify evidence of protected species.

### Ecological Impact Assessment

- 4.6 The methodology for Ecological Impact Assessment (EclA) follows best practice guidelines set by the Chartered Institute of Ecology & Environmental Management (CIEEM): 'Guidelines for Ecological Impact Assessment' (CIEEM, 2022). This includes identifying the baseline conditions on the site and subsequently rating the potential effects of the development based on the sensitivity and value of the resource affected, combined with the magnitude, duration and scale of the impact (or change). This is initially assessed without mitigation measures, and then assessed again after allowing for the proposed mitigation measures; this provides the residual effects. The assessment is divided into construction effects and longer-term operational effects.
- 4.7 Each ecological feature within the site has been considered within a defined Geographic context such as:
- International and European;
  - National;
  - Regional;
  - County;
  - District;
  - Local;
  - Site Level;
  - Negligible.
- 4.8 Based upon CIEEM guidance, value was determined with reference to the following factors:
- Its inclusion as a Designated Site or other protected area;
  - The presence of habitat types of conservation significance, e.g. Habitats of Principal Importance (NERC 2006);
  - The presence (or potential presence) of species of conservation significance e.g. Species of Principal Importance (NERC 2006);
  - The presence of other protected species e.g. those protected under The Wildlife and Countryside Act 1981;
  - The sites social and economic value.
- 4.9 Specifically in the case of bats, the impact assessment has been conducted in accordance with the recently published Bat Mitigation Guidelines (Reason and Wray 2023).

## 5.0 Baseline Ecological Conditions and Protected Species Assessment

### Desktop Study

#### *Designated Sites and Habitats*

- 5.1 The following is a summary of all protected and notable wildlife sites, with sites of local and national importance recorded within 2.0km of the site and sites of international importance within 12.0 km. These are divided into statutory and non-statutory; those with full legal protection and those without, but which the Local Planning Authority should still consider when deciding on planning policy and applications. These sites are summarized in tables 1 and 2 below. A description of locally designated sites is also made below.
- 5.2 This information is included so that the site can be considered within the ecological context of the surrounding area, guiding decisions related to habitat change and protected species; these sites are not necessarily representative of the habitat on or surrounding the site and may not be influenced by the proposals.
- 5.3 The site is within the Impact Risk Zone (IRZ) of Solent Suite of Sites, but residential proposals within this location that do not increase overnight accommodation do not require consultation with Natural England nor to contribute to the Bird Aware Scheme to offset recreational impacts on the Solent Suite of Sites.
- 5.4 The site is within 6.5 km of the 'South Downs Bat SACs' (*namely Ebernoe Common SAC and The Mens SAC*) and is therefore within their key conservation area. Within this area any impacts upon bats must be considered within the context of potential impacts to the SACs.
- 5.5 The MAGIC Mapping shows the site to be inside the Sussex North Water Supply Zone, but as the proposals do not increase overnight accommodation they do not have to demonstrate water neutrality.

Table 1: Statutory Protected Designated Sites

<b>Site Name</b>	<b>Reason for designation</b>	<b>Distance from site</b>
<i>Solent Suite of Sites (Chichester and Langstone Harbours SPA / Ramsar / Solent Maritime SAC, Solent and Isle of Wight Lagoons SAC / Chichester Harbour SSSI)</i>	<i>Chichester Harbour is a large estuarine basin in which at low water extensive mud and sandflats are exposed, drained by channels which unite to make a common exit to the sea. The site is of particular significance for wintering wildfowl and waders and also breeding birds both within the Harbour and in the surrounding permanent pasture fields and woodlands. There is a wide range of habitats which have important plant communities.</i>	<i>720.0 m S</i>
<i>Brandy Hole Copse LNR</i>	<i>The site includes Brandy Hole Copse and East Broyle Copse. Habitats include broadleaved woodland, coniferous woodland, lowland heathland, tall herb and fern, bog and flush and open water. Pipistrelle bats on site.</i>	<i>1.85 km NE</i>
<i>South Downs National Park</i>	<i>1,600km<sup>2</sup> of high-value lowland landscape, including farmland, river valleys, ancient woodland and lowland heaths containing a number of small villages and market towns.</i>	<i>1.95 km NW</i>
<i>Kingley Vale SSSI, NNR, SAC</i>	<i>The largest area of yew woodland in Britain, with areas of chalk grassland also present.</i>	<i>4.7 km NW</i>
<i>Pagham Harbour RAMSAR, SPA, SSSI</i>	<i>A site of intertidal mudflats, saltmarsh, saline lagoons and vegetated shingle supporting high numbers of wintering waders and wildfowl including darkbellied brent geese <i>Bernicla bernicla</i> and breeding populations of little tern <i>Sterna albifrons</i>. Other wildlife includes purple hairstreak butterfly, water voles and numerous invertebrates.</i>	<i>6.5 km SE</i>
<i>Singleton and Cocking Tunnels SAC</i>	<i>Disused railway tunnels providing significant roost and hibernation features, particularly for <i>Barbastelle</i> and <i>Bechstein's Bats</i>.</i>	<i>9.5 km NE</i>

- 5.6 The following non-statutory designated sites are within 1.0 km of the proposal site:

Table 2: Non-statutory Protected Designated Sites

<b>Site Name</b>	<b>Reason for designation</b>	<b>Distance from site</b>
<i>Chichester District Council Bat Movement Network</i>	<i>Areas designated as significant for foraging and commuting bats within the district</i>	<i>100.0 m SE</i>
<i>Fishbourne Meadows SNCI</i>	<i>Low-lying damp meadows and chalk stream.</i>	<i>840.0 m SE</i>

### Habitats

#### *Desk Study*

- 5.7 UK Priority Habitats within 1.0 km of the site include coastal and floodplain grazing marsh, reedbeds, intertidal mud, lowland meadows, ancient and semi-natural woodland, deciduous woodland and woodpasture and parkland. Ponds and hedges are also present locally.

#### *Site Assessment*

- 5.8 The site is given over to the habitats discussed further below.

#### *u1b5 - Buildings*

- 5.9 The site contains a semi-detached house. The building is in good overall condition and offers **negligible ecological value** in a broader sense. The potential for the building to support protected species is discussed in the preliminary bat roost assessment and protected species assessment below.

#### *U1b - Developed Land; Sealed Surface*

- 5.10 The front access path and driveway are brick-paved. The habitat is of **negligible ecological value**.

#### *U1d 828 – Suburban Mosaic of Developed and Natural Surface – Vegetated Garden*

- 5.11 The gardens contain small lawns, dominated by perennial ryegrass *Lolium perenne*. The borders contain small areas of introduced planting including species such as *Hydrangea sp.* and bay laurel *Laurus nobilis*. The rear garden is lined with a recent hedge of leylandii *Cupressus x leylandii*. The habitat is of **site ecological value**.

#### *U1d 829 – Suburban Mosaic of Developed and Natural Surface – Unvegetated Garden*

- 5.12 The garden immediately behind the dwelling is laid to a gravel seating area. The habitat is of **negligible ecological value**.

## 6.0 Protected Species Assessment

### Bats

#### *Desk Study*

- 6.1 1no. EPSML licence is recorded within 2.0 km of site, for common pipistrelle. West Sussex contains at least 15 native bat species. Serotine bat and brown long-eared bat roosts are known from elsewhere in Fishbourne. The site is not on or adjacent the Chichester District Council Bat Movement Network with the nearest part being 100.0 m away.

#### *Site Assessment*

- 6.2 The dwelling (B1) consists of a bungalow of brick construction with a tiled roof. The roof appears to have been replaced within the past 2 years. Some gaps are noted between the cemented ridge tiles and the flat roof tiles; however these are filled with a plastic roofing mesh. The tiles are otherwise very tightly sealed. Soffits and fascias are uPVC and tightly sealed other than 2no. small gaps, one where pipes enter and another in a corner. No external evidence of bats was noted.
- 6.3 Internally, there is a small loft void which is used for storage. The roof is covered in a modern membrane felt over old beams. The felt appeared in good condition with minimal daylight and no external access points noted. The loft was devoid of evidence of bats such as droppings but was noted as having been boarded relatively recently, which may have obscured or removed evidence.
- 6.4 To the rear is a single-storey flat roof extension. This appears to have been covered in a temporary plastic sheeting over the original felt. No suitable access or roost features into the flat roof space were noted.
- 6.5 Overall, the building lacks suitable features for bats and evidence of bats and is considered to offer 'negligible' bat roost potential.
- 6.6 There is limited vegetation of note on the site. The site is central within the residential area and is 100.0 m from the nearest recorded bat movement network. The site itself is considered to offer **negligible** foraging or commuting potential.
- 6.7 There are 2no. old apple trees in the garden. Whilst these display small cavities, they were shallow and wet and unsuitable for bats. No trees offer any significant bat roost potential.

## Birds

### *Desk Study*

- 6.8 Numerous bird species are present in the local area, including a number of woodland, wetland and farmland species. Birds relevant to the proposals which are present locally include swallow (*Hirundo rustica*) and house sparrow (*Passer domesticus*).

### *Site Assessment*

- 6.9 No evidence of active nesting birds was noted and there is currently no significant potential for birds to nest in the dwelling. The habitat is of **negligible value** to birds.
- 6.10 There are several old apple trees in the garden as well as several small shrubs, of **site value** to nesting birds.

### Other Species

- 6.11 The site has limited potential for hedgehogs given the garden is small, and surrounded by tight fences. No potential for or evidence of any other protected species was recorded. No impacts upon other protected species are considered likely and have not been assessed further.

## 7.0 Evaluation of Impacts and Mitigation

### Designated Sites

#### *Potential Impacts*

- 7.1 Given the intervening distances, and the nature of the proposals, any impacts upon local designated sites would be of minor magnitude and highly unlikely to occur. The site is within the Wider Conservation Area of Singleton and Cocking Tunnels SAC; no impacts upon bats or flightlines would occur, meaning no impact would occur to the Ebernoe Common or The Mens SAC qualifying features. The proposals do not increase the overnight accommodation on-site and as such, the proposals do not have to demonstrate nitrate neutrality nor contribute to the Bird Aware Scheme.
- 7.2 The site is not in close proximity to any SNCI; given the scale and nature of proposals, no direct impacts are anticipated.

#### *Mitigation and Compensation*

- 7.3 None required.

#### *Residual Impacts*

- 7.4 The impacts will be negligible and non-significant.

### Habitats

#### *Potential Impacts*

- 7.5 The proposals would impact only the building and developed land. In the absence of mitigation, the proposals would include dust, noise and light pollution of off-site garden habitats. Given the proposals' nature and scale, impacts are of **very minor magnitude** at no more than **site level**.

#### *Mitigation and Compensation*

- 7.6 All construction will be undertaken in accordance with best practice advice with regards to control of dust, noise and emissions. Any chemicals or fuel shall be stored appropriately and on existing surfaces. Trees shall be retained as part of proposals.

#### *Residual Impacts*

- 7.7 Once mitigation is taken into account, the impacts will be negligible and non-significant.



## Bats

### *Potential Impacts*

- 7.8 The building offers 'negligible' bat roost potential and the side of the dwelling proposed for works does not immediately abut another dwelling; there is therefore no significant risk of disturbing a bat roost. Construction noise, dust, lighting and vibration may temporarily make the adjacent off-site garden slightly less suitable for foraging bats, and bats commuting along the adjacent gardens. Given the overall size and nature of the site, the potential impacts to foraging bats is very low.

### *Mitigation and Compensation*

- 7.9 As a matter of course, all tiles being removed shall be carefully removed by hand as a matter of course. Any works shall be undertaken with due consideration and measures to minimise dust and noise. No works shall take place externally between 30 minutes before sunset until 30 minutes after sunrise. No external works lighting shall be used. All new lighting shall accord with the principles of the BCT/ILP Guidance Note 08/23. Only warm white downlighters would be permitted and only where necessary.

### *Residual Impacts*

- 7.10 The overall impact of the scheme will be negligible. New roosting features and enhancement of the garden would result in a gain for bats.

## Nesting Birds

### *Potential Impacts*

- 7.11 No evidence of nesting birds was noted within the building and no vegetation is proposed for removal. No impacts are predicted.

### *Mitigation and Compensation*

- 7.12 None required.

### *Residual Impacts*

- 7.13 The overall impact of the scheme will be negligible.

Hedgehogs

*Potential Impacts*

7.14 No risk of harm exists.

*Mitigation and Compensation*

7.15 None required.

*Residual Impacts*

7.16 The overall impact of the scheme will be negligible.

## **8.0 Ecological Enhancements**

8.1 As the proposals only affect the building and immediate surroundings, development proposals will be expected to demonstrate an overall positive impact on the natural environment as set out in Local Policy. The following ecological enhancements have been proposed as suited to the location and the proposals and would result in a Biodiversity Net Gain, in accordance with Local and National Policy.

- Incorporation of a bird box into the new extension at appropriate height and orientation, such as a house sparrow terrace installed to north or east elevation.
- Integration of a bat box into the dwelling; at least one small crevice-style box. This should be sited on the southern aspect away from lights and windows.
- Addition of an insect box or similar feature to the garden.
- Addition of a hedgehog box to the garden. The garden is currently fenced against dog escape; when possible a 12cm gap in a fence shall be made to allow hedgehog access.

## 9.0 Conclusions

- 9.1 Overall, the proposals are considered to represent a 'negligible' impact upon ecology and no further surveys are recommended. The proposal area consists of existing building and developed land, of negligible ecological value.
- 9.2 The proposals are not anticipated to have any significant impact upon ecology; the proposals stand a 'negligible' chance of disturbing bats or their roosts provided basic avoidance measures are incorporated into construction. No further surveys are recommended at the site for these proposals.
- 9.3 No significant effects are anticipated upon any designated sites or priority habitats.
- 9.4 When mitigation and enhancements have been taken into account, the proposals are not considered to have a negative impact upon habitats or protected species in accordance with planning policy and once enhancements are considered, would result in a net gain.
- 9.5 The proposals include for new proportionate ecological enhancements. The proposals would therefore accord with the relevant Local Plan Policies.

## 10.0 References

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**11.0 Appendix 1 – Site Photos**

Photo 1 – View of the dwelling from the access (north-east).



Photo 2 – View of the dwelling from the rear (south).



Photo 3 – View inside the loft.



Photo 4 – View of the apple trees on-site.



Photo 5 – View of the garden.





12.0 Site Aerial

