Land West of King Business Centre, Reeds Lane, Sayers Common

Reside Holdings Ltd

Ecological Assessment

Version	Created By	Approved By	Date
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1. Introduction

1.1. Site Background and Proposals

1.1.1. Ecology Solutions was commissioned in April 2024 to undertake an Ecological Assessment of Land West of King Business Centre, Reeds Lane, Sayers Common, hereafter referred to within this report as the 'Application Site'.

1.1.2. The Development Proposals at the Application Site are for the erection of 80 new residential dwellings (Use Class C3), including affordable housing units, vehicular pedestrian and cycle access (including new footpath links to the east and west of the site along Reeds Lane), landscaping and open space, parking, sustainable drainage and other related works.

1.2. Application Site Characteristics

1.2.1. The Application Site is approximately 4.2ha in size and lies within the village of Sayers Common in West Sussex. The Application Site consists primarily of other neutral grassland subject to regular mowing and grazing. Other habitats present within the site include areas of bramble scrub in the centre of the Application Site and an area of lowland mixed deciduous woodland along the northern boundary of the Application Site. Several individual trees are present near to the western boundary. Native hedgerows are present along the southern and western boundaries. A ditch / field drain is present along the western boundary.

1.2.2. In terms of the wider area, lowland mixed deciduous woodland is located immediately to the north of the Application Site, although the wider surrounding consist primarily of arable fields. Reeds Lane is located immediately south of the Application Site, with existing residential development and the consented development site (planning ref = DM/22/0640) present adjacent to the east of the Application Site.

1.3. Ecological Assessment

1.3.1. This document assesses the ecological interest of the Application Site. The importance of the habitats within the Application Site is evaluated with due consideration given to the guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM)[1] .

1.3.2. Where necessary, mitigation measures are recommended so as to safeguard any significant existing ecological interest within the Application Site and, where appropriate, potential enhancement measures are put forward and reference made to both national and local biodiversity priorities.

[1] CIEEM (2022). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Version 1.3 – Updated September 2024. Chartered Institute of Ecology and Environmental Management, Winchester.

2. Survey Methodology

2.1. The methodology utilised for the survey work can be split into three areas, namely desk study, habitat survey and faunal survey. These are discussed in more detail below.

2.2. Desk Study

2.2.1. In order to compile background information on the Application Site and the surrounding area, Ecology Solutions contacted Sussex Biodiversity Records Centre (SBRC) for protected species records and recognised statutory and non-statutory designated sites. SBRC returned the records in March 2024.

2.2.2. The data search area included a 2km radius centred on the Application Site for protected species records, information on nationally designated sites and for internationally designated sites. A larger 3km radius centred on the Application Site was used for any records of birds.

2.2.3. Further information on designated sites from a wider search area was obtained from the online Multi-Agency Geographic Information for the Countryside (MAGIC)[2] database, which uses information held by Natural England and other organisations.

2.2.4. This information is reproduced where appropriate on Plan ECO1.

2.3. Habitat Survey

2.3.1. The Application Site was surveyed in June and July 2024 based on UK Habitat Classification (UKHab)[3] methodology as recommended by Natural England with an update survey carried out in October 2025 to confirm that no significant changes had occurred.

2.3.2. UKHab is a comprehensive system for mapping and recording habitats, designed to provide a simple and robust approach to survey and monitoring, and replaces the Phase 1 survey methods. UKHab comprises of a principal hierarchy ranging from level 1 (ecosystems) to level 5 (defined habitats including Annex 1 habitats) when classifying habitats, for this survey, all primary habitats were recorded to level 4 minimum. Secondary habitats are also used to provide further information on a main primary habitat where appropriate.

2.3.3. Using the above method, the Application Site was classified into areas of similar botanical community types, with a representative species list compiled for each habitat identified.

[2] https://magic.defra.gov.uk/MagicMap.html
[3] UKHab Ltd (2023) *UK Habitat Classification Version 2.0* (at https://ukhab.org)

2.3.4. It is important to note that all the species that occur in each habitat would not necessarily be detectable during survey work carried out at any given time of the year, since different species are apparent at different seasons.

2.3.5. The UKHab surveys were undertaken in June and July 2024 and October 2025 in suitable weather conditions and a robust botanical inventory has been collated allowing for a robust identification and classification on the habitats present.

2.4. Faunal Survey

2.4.1. Obvious faunal activity recorded during the UKHab survey, such as birds or mammals observed visually or by call, was recorded. Specific attention was paid to any potential use of the Application Site by protected species, priority species or other notable species.

2.4.2. In addition to general observations of faunal activity, specific surveys were undertaken to assess habitat suitability for [redacted], bats, hazel dormouse *Muscardinus avellanarius*, reptiles, water vole *Arvicola amphibius* and otter *Lutra lutra*. Taking into consideration the findings of the suitability assessment and desk study, further surveys were conducted with regards to bat, great crested newts (GCN), dormouse and reptiles.

[redacted]

2.4.6. Specific attention was given to the woodland immediately adjacent to the northern boundary of the Application Site.

Bats

2.4.7. Field surveys were undertaken with regard to best practice guidelines issued by Natural England (2023[4]), the Joint Nature Conservation Committee (2012[5]) and the Bat Conservation Trust (2023[6]).

Ground-level Tree Assessment (GLTA)

2.4.8. All trees within the Application Site were assessed for their potential to support roosting bats in June 2024 with updated assessment completed in October 2025. This was done from the ground level using binoculars to visually search for any Potential Roost Features (PRFs). The work was undertaken by an experienced bat worker and aimed to establish the likelihood of presence / absence of roosting bats within or immediately adjacent to the Application Site.

2.4.9. Features typically favoured by bats, or evidence of past use by bats were searched for, including:

- Obvious holes, e.g. rot holes and old Woodpecker holes;
- Dark staining on a tree below a hole;
- Tiny scratch marks around a hole from bats' claws;
- Cavities, splits and / or loose bark from broken or fallen branches, lightning strikes etc.; and
- Very dense covering of mature Ivy Hedera helix over the trunk.

Night-time Bat Walkover Surveys (NBW)

2.4.10. Three NBW surveys were undertaken in July, August, and October 2024. The NBW survey methodology replaces the previous bat activity survey methodology that was recommended in previous survey guidelines produced by the Bat Conservation Trust (BCT). Surveyors were equipped with Echo Meter Touch 2 PRO bat detectors with all recorded data reviewed and analysed via Kaleidoscope software and then manually reviewed by a suitably experienced ecologist.

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[4] Reason, P.F. and Wray, S. (2023) *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats*. Charted Institute of Ecology and Environmental Management (CIEEM).
[5] Mitchell-Jones, A.J. & McLeish, A.P. (2012). *Bat Workers' Manual.* 3rd edition. Joint Nature Conservation Committee (JNCC).
[6] Collins, J. (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 4th Edition. The Bat Conservation Trust, London.

2.4.11. Surveyors were on-site prior to sunset and initially stationed themselves along potential flight lines close to any potential roost structures. The NBW survey began at sunset. Surveyors remained in position to count, observe behaviour and make recordings of any bats observed for up to an hour after sunset depending on the levels of activity observed.

2.4.12. The surveyors then began walking a transect that covered the suitable boundary features of the Application Site with the aim of identifying any bats using the Application Site for foraging or dispersal. In order to maximise the encounter rate of bats (i.e. of both early- and late-emerging species), the walked transect portion of the NBW commenced around 30 to 60 minutes after sunset and continued until approximately two hours after sunset.

2.4.13. The surveyors observed the behaviour of any bat recorded, i.e. foraging or commuting, together with noting the species present and number of bats present at that location.

2.4.14. Surveys were conducted when the night-time temperature was above 10°C. The insectivorous diet of bats means there is little or no food available when temperature falls below this level and consequently levels of activity are low and may not accurately reflect the value of the Application Site for bats. The weather conditions for the surveys were recorded and any limitations noted.

Remote Surveys

2.4.15. The NBW surveys were complemented by the deployment of two SM4BAT static detectors in order to conduct remote surveys. These remote surveys were undertaken in July, August, and September 2024 to monitor activity across a minimum of five consecutive nights on each occasion. The two static detectors were positioned in the northeast and southwest of Application Site (see Plan ECO4 for locations).

2.4.16. These detectors were programmed to record from 30 minutes before sunset until 30 minutes after sunrise and were deployed for a period of at least five consecutive nights. The recorded data has been subsequently analysed with Kaleidoscope software. The total number of bat registrations per species was then calculated to gives an impression of the overall level of bat activity on a given survey night, as well as the proportion of activity attributed to a given species or group of species (Myotis species are not generally separated).

Great Crested Newts (GCN)

2.4.17. As part of the desk study exercise, a search of waterbodies was completed using aerial and ordinance survey mapping. In total, six waterbodies were found to be present within 250 metres of the Application Site in addition to a ditch running along the western boundary of the Application Site. Further survey work was completed on the onsite ditch and requests for access to complete survey work were sent to landowners of the remaining offsite waterbodies. Two of the six waterbodies were subject to eDNA surveys in 2024, Ecology Solutions received no response to access requests for the remaining waterbodies.

2.4.18. It should be noted that Ecology Solutions completed a similar assessment for the adjacent development site (planning ref = DM/22/0640) in 2016 and 2020.

The results of these assessments and surveys are discussed where appropriate in section 4 of this report.

eDNA Surveys

2.4.19. To determine the presence or absence of Great Crested Newts within the two off-site ponds located to the north-east and the ditch to the west, Ecology Solutions undertook eDNA testing in June 2024 (see Plan ECO2).

2.4.20. While residing within a waterbody, Great Crested Newts deposit traces of DNA which can be detected through sampling the pond water and undergoing analysis within the laboratory. Pond samples can be collected between 15 April and 30 June inclusive.

2.4.21. Water samples of any given waterbody are taken in 20 separate locations, with a focus on areas of high suitability for Great Crested Newts. The samples are then pooled together into a self-supporting Whirl-pak Bag.

2.4.22. Once the pooled samples have been mixed thoroughly 15ml of water is removed and transferred into an ethanol filled test tube. This is repeated a further five times leaving six test tubes that contain a mix of the sampled water and ethanol. These are then immediately sent to a laboratory to undergo analysis.

2.4.23. Within the laboratory the samples are pooled together and tested via real time PCR (or q-PCR) in order to amplify select parts of the DNA allowing it to be detected and measured. A result of presence or absence is returned by the laboratory. If present (indicating presence of the species) no measure of the population size is obtained through this survey method.

Reptiles

2.4.24. Specific surveys for reptiles were carried out between July and September 2024. The methodology utilised was principally derived from guidance given in Froglife Advice Sheet 10[7], the Herpetofauna Workers' Manual[8], the Herpetofauna Groups of Britain and Ireland's (HGBI) advisory note[9] and Natural England's Standing Advice for Reptiles[10].

2.4.25. Areas of suitable habitat were surveyed for the presence of reptiles using artificial refugia ("tins"). These tins provide shelter and heat up more quickly than the surroundings in the morning and can remain warmer than the surroundings in the late afternoon. Being ectothermic (cold blooded), reptiles use them to bask under and raise their body temperature which allows them to forage earlier

[7] Froglife (1999) *Reptile Survey: an introduction to planning, conducting and interpreting surveys for snake and lizard conservation*. Froglife Advice Sheet 10. Froglife, Halesworth.
[8] Gent, T and Gibson, S. (2003*). Herpetofauna Workers' Manual*. JNCC, Peterborough.
[9] Herpetofauna Groups of Britain and Ireland (HGBI). (1998). *Evaluating Local Mitigation / Translocation Programmes: Maintaining Best Practice and Lawful Standards*.
[10] Natural England (2011). Standing Advice for Reptiles.
http://www.naturalengland.org.uk/Images/Reptile%20feb11_tcm6-21712.pdf

and later in the day. A total of 86 approximately 0.5m x 0.5m roofing felt tins were deployed across Application Site.

2.4.26. To determine presence / absence of reptiles, the tins are checked for reptile activity over seven visits at appropriate times of the day (avoiding the middle of the day when the ambient air temperature is at its highest) in accordance with Natural England guidance. Optimum weather conditions for reptile surveying are temperatures between 10˚C and 18˚C, intermittent or hazy sunshine and little or no wind.

2.4.27. All surveys to date were completed by experienced ecologists following species guidelines and survey protocols.

Hazel Dormouse

2.4.28. Specific surveys for hazel dormouse were carried out between July and November 2024. The methodology utilised was principally derived from guidance given in the Dormouse Conservation Handbook[11].

2.4.29. The survey technique involves the erection of nest tubes within all suitable habitat for hazel dormouse. A total of 100 nest tubes were installed in the hedgerows around the boundaries of the Application Site.

2.4.30. Nest tubes were placed in accordance with the guidance provided by the Mammal Society and Natural England and as recommended in the Dormouse Conservation Handbook[12]. Tubes were placed within hedgerows at approximately 10 metre intervals where suitable locations were identified. The nest tubes were attached with wire ties underneath suitably sturdy horizontal branches and positioned on average at approximately 1.5 metres above ground level.

2.4.31. Following deployment in July, monitoring surveys were undertaken monthly from July until November 2024.

2.4.32. The surveys can be scored for effort according to the method developed from the South West Dormouse Project (Chanin and Woods 2003). The system used provides an overall score that reflects the chances of Dormice being discovered if present, and thus provides an indicator of 'thoroughness' of a survey. This score is calculated based on the number of tubes used and the number of months the tubes were in place.

[12] Bulion, S., Wolton, R., & White, I. (2025) *Hazel Dormouse Conservation Handbook – Third edition.* The Mammal Society. ISBN: 978-1-0687982-3-8

2.4.33. The months of the year are weighted according to the likelihood of recording dormice as set out below.

Table 1: *Monthly Score Weighting (Chanin & Woods 2003)*

Month	Weighting
April	1
May	4
June	2
July	2
August	5
September	7
October	2
November	2

2.4.34. A score of 20 (or above) is deemed a thorough survey, and a score of 15 to 19 may be regarded as adequate where circumstances do not permit more time or more tubes (particularly if other survey methods have also proved negative).

2.4.35. A full season of surveys would result in a score of 25 based on the weighting list above. This is based on the deployment of 50 nest tubes. Ecology Solutions deployed a total of 100 nest tubes for the period July to November resulting in a score of 36. A robust surveys was therefore conducted and the results can be relied upon to inform the Development Proposals.

2.4.36. It is noted that new guidelines for dormouse surveys were published in 2025. The new guidelines move away from assigning scores to certain months and instead the number of months required to demonstrate a robust survey is dependent on the quality of habitat present.

2.4.37. Given the species present and the level of connectivity to high suitability woodland to the north of the Application Site, it is considered to contain good quality habitat and therefore a survey completed across the period July to November would also be robust when considering the new survey guidelines.

3. Ecological Features

3.1.1. A UKHab survey was undertaken within the Application Site by Ecology Solutions on the 27th June and 30th July 2024 with an updated walkover completed on the 10th October 2025. The following primary habitats were recorded:

- Other neutral grassland;
- Modified grassland;
- Bramble scrub;
- Lowland mixed deciduous woodland;
- Tall forbs;
- Native hedgerow with trees;
- Individual tree; and
- Ditch.

3.1.2. The above habitats are discussed below and illustrated in Plan ECO2.

3.2. Other Neutral Grassland (UKHab code g3c)

3.2.1. Other neutral grassland is located across the majority of the Application Site. During previous surveys associated with the adjacent development site (planning ref = DM/22/0640) completed between 2020 and 2022, the Application Site was noted to be grazed by cows resulting in a short sward with consistent bare ground and poaching, more recently it is understood that the Application Site has been managed through mowing.

3.2.2. A botanical survey comprising quadrat surveys was carried out on the 30th July 2024, a total of five 1m² quadrat locations were chosen at random across the grassland parcel. Species present within the grassland were bird's-foot trefoil *Lotus corniculatus*, Yorkshire fog *Holcus lanatus*, smooth meadow grass *Poa pratensis*, perennial ryegrass *Lolium perenne*, creeping bent *Agrostis stolonifera*, silverweed *Potentilla anserina*, meadow vetchling *Lathyrus pratensis*, creeping cinquefoil *Potentilla reptans*, common groundsel *Senecio vulgaris*, tufted hair grass *Deschampsia cespitosa*. common bent *Agrostis capillaris*, bramble *Rubus fruticosus*, germander speedwell *Veronica chamaedrys*, and agrimony *Agrimonia eupatoria*. Number of species recorded within each quadrat are detailed below in Table 2. Other species not recorded within a specific quadrat included water mint *Mentha aquatica*, soft rush *Juncus effusus* and hard rush *Juncus inflexus* near the western boundary.

3.2.3. During this initial visit it was noted that a large mound of excavated soil had been deposited in the north of the Application Site (see Appendix 1 for photos). This is understood be soil from the adjacent development site.

3.2.4. During the update walkover survey completed in the October 2025 additional species recorded identified include false oat grass *Arrhenatherum elatius*, timothy *Phleum pratense*, meadow foxtail *Alopecurus pratensis*, pendulous sedge *Carex pendula*, and cock's-foot *Dactylis glomerata*.

Table 2: *Results from grassland quadrat surveys*

Species	July 2024 Survey				
	Q1	Q2	Q3	Q4	Q5
Yorkshire fog	X	X	X		X
Smooth meadow grass	X	X			
Perennial rye	X				
Creeping bent	X				
Silver weed		X			
Meadow vetchling		X			
Common birds-foot trefoil		X	X		X
Creeping cinquefoil		X			
Groundsel		X			
Common bent			X	X	X
Tufted hair grass			X		
Bramble				X	X
Germander speedwell				X	
Agrimony					X
Total Species	**4**	**7**	**4**	**3**	**5**
Average number of species per quadrat	**4.6**				

3.3. Modified Grassland (UKHab code g4)

3.3.1. An area of modified grassland is present at the eastern extent of the Application Site. This comprises a regularly mown road verge to the south of the adjacent King Business Centre.

3.3.2. Species present within this grassland were limited to perennial ryegrass, yarrow *Achillea millefolium*, white clover *Trifolium repens*, creeping cinquefoil and ribwort plantain *Plantago lanceolata*.

3.4. Bramble Scrub (UKHab code h3d)

3.4.1. An area of the Application Site was noted to comprise of bramble scrub which had been cut close to ground level before the initial survey completed in June 2024. No other scrub species were noted to be present within this area.

3.5. Lowland Mixed Deciduous Woodland (UKHab code w1f)

3.5.1. Lowland mixed deciduous woodland is present along much of the northern boundary of the Application Site. This appears to be self seeded from the offsite woodland immediately adjacent with trees on the southern edge of this woodland being considerably younger and smaller than those further north. The understorey of the woodland was relatively limited with small patches of bramble and grasses present.

3.5.2. The canopy of the woodland is comprised entirely of English oak. Species recorded in the understory include English oak saplings, ground ivy *Glenchoma hederacea*, bluebell (although limited to the boundary between the onsite and offsite woodland), lords and ladies *Arum maculatum*, bramble, clustered dock *Rumex conglomeratus*, rosebay willowherb *Chamaenerion angustifolium*, fleabane *Pulicaria dysenterica* and hedge woundwort *Stachys sylvatica*.

3.6. Tall Forbs (secondary code – 16)

3.6.1. An area of tall forbs is present to the south-west of the Application Site adjacent to Reeds Lane. Species present were limited to common nettle *Urtica dioica* and dock *Rumex* sp.

3.7. Native Hedgerow with trees (h2a / h2a5 – secondary code 11)

3.7.1. Two native hedgerows with trees are present on-site; H1 located to the south of the Application Site along the southern site boundary and H2 located to the west of the Application Site running along the western site boundary, both hedgerows H1 and H2 were situated behind a post and wire fence.

3.7.2. Hedgerow **H1** measures approximately 6m in height, with trees reaching up to 20m. Woody species present within the hedgerow include hawthorn *Crataegus monogyna*, bramble, hazel *Corylus avellana*, non-native *Prunus sp*, field maple *Acer campestre* and crab apple *Malus sylvestris*, black bryony *Dioscorea communis* was also noted as a climber. the ground flora consisted of ragwort *Jacobaea vulgaris*, perennial rye *lolium perenne*, Yorkshire fog *Holcus lanatus*, tufted hair grass *Deschampsia cespitosa*, common vetch *Vicia sativa*, ivy *Hedera helix*, nipplewort *Lapsana communis*, cock's-foot *Dactylis glomerata*, false oat grass *Arrhenatherum elatius*, and clustered dock *Rumex conglomeratus*.

3.7.3. Hedgerow **H2** contains species oak *Quercus sp*, field maple, bramble, hawthorn, rose sp, and goat willow *Salix caprea*, ground flora includes species such as

clustered dock, spear thistle *Cirsium vulgare*, bittersweet nightshade *Solanum dulcamara*, and common nettle.

3.8. Individual Tree (UKHab secondary code 200)

3.8.1. At the time of the June 2024 survey, a number of individual trees were noted to be present although a review of aerial imagery and the results of previous aboricultural surveys found that several additional trees were previously present but had been removed from the Application Site at some point since 2020 but prior to Ecology Solutions initial survey.

3.8.2. The majority of trees surveyed were English oak, with a single ash and a single goat willow also present.

3.9. Ditch (UKHab secondary code 50)

3.9.1. A ditch is present along the western boundary, flowing northwards from a culvert at the south western corner of the Application Site. The ditch was found to be dry during surveys in July 2024 with no aquatic vegetation, although during eDNA surveys completed June 2024 and in support of the adjacent development site in 2020 this was holding water, albeit at low levels.

3.10. Background Records

3.10.1. Species returned listed under the Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) includes bluebell *Hyacinthoides non-scripta*, identified in April 2017 approximately 1.2km to the northeast of the Application Site. No species featured in Section 41 of the Natural Environment Rural Communities (NERC) Act 2006 (as amended) were returned by the data search. Bluebell were recorded at the northern boundary of the Application Site during surveys.

3.10.2. Plants which are listed as Sussex rare and returned within the data search include Welsh poppy *Meconopsis cambrica*, and black-poplar *Populus nigra subsp. Betulifolia*.

3.10.3. A number of fungi were returned in the data search which are listed as Sussex rare, these include scarlet catterpillarclub *Cordyceps militaris* in October 2019 0.6km to the northeast of the application site, slimy waxcap *Gliophorus irrigates* in November 2021 approximately 1.8km to the north of the application site, spangle waxcap *Hygrocybe insipida* in October 2021 approximatly 0.6km to the northeast of the Application Site, oily waxcap *Hygrocybe quieta* in October 2019 approximalty 0.6km to the northeast of the Application Site, and pink waxcap *Porpolomopsis calyptriformis*. pink waxcap is the most recent record returned being recorded in September 2023 approximately 0.7km to the northeast of the Application Site.

Invasive non-native Species (INNS)

3.10.4. No records of Invasive non-native species were returned from within the Application Site. INNS listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were returned within the radius of the data search, namely Japanese knotweed *Fallopia japonica* in December 2009 approximately 1.2km to the south of the Application Site, Himalayan balsam *Impatiens glandulifera* in august 2021 approximately 1.6km to the northeast of the Application Site, and Virginia-creeper *Parthenocissus quinquefolia* in July 2016 approximately 1.3km to the south of the Application Site. Red valerian *Centranthus ruber* was also returned in the data search, recorded in July 2016 approximately 1.2km to the southeast of the Application Site, this is a Sussex INNS.

4. Wildlife use of the Site

4.1. General observations were made during the surveys of any faunal use of the Application Site, with specific attention paid to the potential presence of protected, priority, or otherwise notable species. Suitability assessments were also completed for all relevant protected species.

4.2. Further to these suitability assessments and review of records returned from the local records centre, specific surveys have been completed regarding [redacted] bats, great crested newt, hazel dormouse and reptiles.

[redacted]

4.3. Bats

4.3.1. The grassland was identified as having some potential for foraging bats. The hedgerows provide potential dispersal and commuting opportunities for locally present bat species. As such, surveys were conducted in July, August, and September 2024. The results of the surveys are discussed below.

Ground Level Tree Assessment (GLTA)

4.3.2. All trees within and directly adjacent to the Application Site were appraised for their suitability to support roosting bats during the UKHab survey in June 2024 with update survey completed in October 2025. A number of trees within the site were identified as supporting Potential Roost Features (PRF) PRFs, 4 of the trees being classed as having PRF-I suitability meaning they have potential for

individual / small number of roosting bats. 5 trees within the Application Site were identified as having PRF-M suitability. These trees are discussed further below.

4.3.3. Tree T2 is a mature English Oak standing at approximately 18m, T2 contains features such as loose bark and Ivy cover giving it the potential to support individual / low numbers of roosting bats (PRF-I). T3 is an English oak of similar height, deemed to be of PRF-M potential for bat roost due to a woodpecker hole approximately 16m high on the northern aspect of the central stem facing into the Application Site. T4, T5 and T8 are English oak of the same maturity as T2 and T3. T4, T5, and T8 would also be classified as having PRF-M potential for bats due to having similar features to that found on T3. T6, an English oak of approximately 18m would have PRF-I potential to support roosting bats due to dense ivy cover and superficial damage.

4.3.4. T9 is an ash tree which would be rated PRF-M due to a woodpecker hole located at a height of approximately 5m on the eastern aspect of the tree, facing into the Application Site. T10 is an English oak, classified as PRF-I due to some areas of loose bark and dead wood providing the potential for individual roosting bats. T12 located in the north of the site is an English oak which has some potential for individual roosting bats, rated PRF-I.

4.3.5. The locations of all trees detailed above are shown on Plan ECO2.

Nighttime Bat Walkover (NBW) surveys

4.3.6. To ascertain the general abundance of foraging and commuting bats across the Application Site, Ecology Solutions conducted a total of three NBW surveys in July, August and October 2024. The results of the July and August surveys are illustrated on Plans ECO3a, and ECO3b. The GPS failed during the survey completed in October and therefore a plan showing locations of registrations could not be produced.

4.3.7. The surveys were undertaken in favourable weather conditions, with these, alongside the timings of the surveys, summarised in Table 3 below.

Table 3. NBW survey timings and conditions

Date	Sunset time	Survey Start	Weather Conditions
25.07.2024	20:56	20:56	18˚C, 100% cloud cover, infrequent showers, gentle breeze
26.08.2024	19:58	19:58	16˚C, 75% cloud cover, dry, light breeze
01.10.2024	18:37	18:37	12˚C, 100% cloud cover, light rain, moderate breeze

NBW Survey 25.07.2024

4.3.8. The results of the NBW survey completed on 25th of July 2024 are summarised below and in Table 4 and are illustrated on Plan ECO3a.

4.3.9. This survey recorded a activity mostly concentrated towards the northern boundary and along the western hedgerow of the Application Site. The majority of registrations can be attributed to soprano pipistrelle *Pipistrellus pygmaeus*, and common pipistrelle *Pipistrellus pipistrellus* with 73 and 71 registrations recorded respectively. Soprano pipistrelle were recorded throughout the Application Site, common pipistrelle were also recorded throughout the site however the majority of registrations for common pipistrelle were located to the north of the Application Site.

4.3.10. 21 registrations for noctule bat *Nyctalus noctule* were recorded throughout the Application Site. Three registrations of unidentified myotis species were recorded, these were recorded along the northern boundary of the Application Site.

Table 4. NBW Survey results 25.07.24

Species	Number of Registrations
Common pipistrelle	71
Soprano pipistrelle	73
Noctule	21
Myotis species	3
Total	168

NBW Survey 26.08.24

4.3.11. The results of the NBW survey completed on the 26th of August 2024 are summarised below and in Table 5 and are illustrated on Plan ECO3b.

4.3.12. This survey recorded similar levels of bat activity to the previous survey, with a total of 148 registrations recorded, the activity was largely focused towards the northern and western boundaries of the Application Site. The majority of the registrations can be attributed to common pipistrelle, making up 63% of the calls. soprano pipistrelle was also highly recorded making up 28% of the total recordings. Seven of the remaining calls can be attributed to noctule bat, and the remaining six registrations were from an unidentified myotis species. Both the common and soprano Pipistrelle were recorded along the southern, western and northern boundaries, the noctule and myotis species registrations all occurred near the woodland along the northern boundary.

Table 5. NBW Survey results 26.08..24

Species	Number of Registrations
Common Pipistrelle	93
Soprano Pipistrelle	42
Noctule	7
Myotis species	6
Total	148

NBW Survey 01.10.24

4.3.13. The results of the NBW survey completed on the 1st of October 2024 are summarised below in Table 6. Due to a failure of the GPS mapping on this survey, a plan could not be produced.

4.3.14. This survey recorded a low level of bat activity, with a total of 46 registrations recorded. The majority of the registrations can be attributed to Soprano pipistrelle, making up 67% of the calls. The remaining calls can be attributed to Common pipistrelle with 12 registrations, and unidentified myotis species having been recorded 3 times throughout the survey.

Table 6. NBW Survey results 19.09.24

Species	Number of Registrations
Common pipistrelle	12
Soprano pipistrelle	31
Myotis species	3
Total	46

Automated detector surveys

4.3.15. Automated detector surveys were undertaken in July, August, and October 2024 with the detectors positioned in the northwest and southeast of the Application Site, with their locations shown on Plan ECO4. The results of the automated surveys are discussed below.

Automated Surveys 25/07/2024 – 29/07/2024

4.3.16. Following the NBW survey undertaken on the 25th of July 2024, two automated detectors were deployed in strategic locations. These detectors were left to recorded for a period of five nights. The results for each night for the detector placed at Location 1 are detailed below in Table 7.

4.3.17. The automated detector deployed at the northern boundary failed after 5 hours, having not recorded any bats in that time frame.

Table 7: *Results from July bat detector survey at location 1*

Location 1 – Southern Boundary Location					
Species	Survey Date (25/07/24 – 29/07/2024)				
	25/07	26/07	27/07	28/07	29/07
	Number of Registrations				
Serotine				2	1
Myotis *Spp.*		4	3	71	18
Leisler's				1	1
Noctule	11	15	10	4	1
Common pipistrelle	13	57	20	65	91
Soprano pipistrelle	22	66	53	81	71
Brown long eared		4			2
Total	46	146	86	224	185

Automated Surveys 26/08/2024 – 30/08/2024

4.3.18. Following the NBW survey undertaken on 26th of August 2024, two automated detectors were deployed in strategic locations. These detectors were left to recorded for a period of five nights. The results for each night for each detector are detailed below in Tables 8 and 9.

Table 8: *Results from August bat detector survey at location 1*

Location 1 – Southern Boundary Location					
Species	Survey Date (26/08/24 – 30/08/2024)				
	26/08 /2024	27/08 /2024	28/08 /2024	29/08 /2024	30/08 /2024
	Number of Registrations				
Barbastelle	2	9		1	3
Serotine	1	3	1		
Myotis *Spp.*	42	58	22	12	8
Leisler				1	
Noctule	19	14	11	11	8
Nathusius Pipistrelle	1				
Common Pipistrelle	28	28	52	38	36
Soprano Pipistrelle	61	98	83	104	41
Brown Long Eared	4	1	5	6	1
Total	158	211	174	173	97

Table 9: *Results from August bat detector survey at location 2.*

Location 2 – Northern Boundary Location					
Species	Survey Date (26/08/24 – 30/08/2024)				
	26/08/2024	27/08/2024	28/08/2024	29/08/2024	30/08/2024
	Number of Registrations				
Barbastelle					1
Serotine	1	8	2	1	3
Myotis *Spp.*	2	18	10	14	17
Leisler			1	2	2
Noctule	5	21	26	5	3
Nathusius Pipistrelle		1	1		
Common Pipistrelle	420	359	102	213	73
Soprano Pipistrelle	21	84	72	38	67
Brown Long Eared			2	1	2
Total	449	491	216	274	168

Automated Surveys 26/09/2024 – 01/10/2024

4.3.19. Two automated detectors were deployed in strategic locations on the 26th September 2024. These detectors were left to recorded for a period of five nights. The results for each night for each detector are detailed below in Tables 10 and 11.

Table 10: *Results from September bat detector survey at location 1*

Location 1 – Southern Boundary Location					
Species	Survey Date (26/09/2024 – 01/10/2024)				
	26/09/2024	27/09/2024	28/09/2024	29/09/2024	30/09/2024
	Number of Registrations				
Myotis *Spp.*		3	1	5	
Noctule	1	1	2	7	1
Common Pipistrelle	25	22	4	26	22
Soprano Pipistrelle	10	38	18	28	93
Brown Long Eared		1			
Total	36	65	25	66	116

Table 11: *Results from September bat detector survey at location 2*

Location 2 – Northern Boundary Location					
Species	Survey Date (26/09/2024 – 01/10/2024)				
	26/09/2024	27/09/2024	28/09/2024	29/09/2024	30/09/2024
	Number of Registrations				
Barbastelle	3	1			
Serotine		1	1		
Myotis *Spp.*	54	38	20	4	53
Noctule	4	1		1	3
Nathusius Pipistrelle		1			1
Common Pipistrelle	499	189	34	1	382
Soprano Pipistrelle	57	178	13	28	126
Brown Long Eared		1	3	1	3
Greater Horseshoe		1			
Total	617	411	71	35	568

4.3.1. **Background Records.** The data search undertaken with SBRC returned no records of bats within the Application Site, 24 records of bat were returned from within the local area, the closest being a number of Common pipistrelle records returned in the woodland directly north of the Application Site, the most recent of these was from 2022 from a location 0.06km from the Application Site. Other notable bat species recorded within the search in the last 10 years include barbastelle *Barbastella* in July 2020 approximately 1.6km to the southeast of the Application Site, Bechstein's bat *Myotis bechsteinii* in September 2017 approximately 0.4km to the east of the Application Site, whiskered bat *Myotis mystacinus* in September 2017 approximately 0.4km to the east of the Application Site, natterer's bat *Myotis nattereri* in June 2017 approximately 0.4km to the east of the Application Site, noctule *Nyctalus noctula* in July 2020 approximately 1.7km to the southeast of the Application Site, soprano pipistrelle in August 2017 approximately 0.4km to the east of the Application Site, and long-eared bat *Plecotus sp* in July 2020 approximately 1.6km to the south of the Application Site.

4.3.2. No recent records for roosting bats were returned by SBRC.

4.4. Hazel Dormouse

4.4.1. The hedgerows and woodland within the Application Site offer suitable foraging, nesting and dispersal opportunities for hazel dormouse.

4.4.2. The dormouse nest tube surveys completed at the Application Site across the period July to November 2024, found no evidence of dormouse and as such hazel dormouse are considered unlikely to be present.

4.4.3. It is worth noting that previous surveys completed at the adjacent development site also recorded no evidence of dormouse.

4.4.4. **Background Records.** No records of hazel dormouse were returned from the data search undertaken with SBRC.

4.5. Amphibians (Great Crested Newt)

4.5.1. As discussed above in the section 2, the three waterbodies (P1, P8 and P9) were subject to eDNA testing in June 2024, the results of which can be seen at Appendix 1.

4.5.2. All waterbodies tested returned negative results for the presence of GCN eDNA. As such it is deemed that GCN do not utilise these waterbodies and no further surveys were required.

4.5.3. Given the results of these surveys and the desk study and the habitats present within the Application Site it is considered extremely unlikely that the Application Site supports Great Crested Newt and no further consideration is given to this species within this report.

4.5.4. **Background Records.** Six records for great crested newt *Triturus cristatus* were returned from the data search within the last 10 years. The closest and most recent record related to a location approximately 1km south of the Application Site in 2019, where an eDNA survey confirmed the presence of great crested newts.

4.5.5. 10 records were returned for palmate newt and 12 for smooth newt, the closest of both species was recorded approximately 0.39km east of the Application Site in 2017.

4.5.6. Two records were returned for common frog the closest being approximately 0.25km north east of the Application Site in 2022.

4.5.7. One record of common toad was returned from a location approximately 1.6km north west of the Application Site in 2018.

4.6. Reptiles

4.6.1. The majority of the grassland present within the Application Site is of lower suitability for reptiles due to the short sward height. Suitable reptile habitat within the Application Site is limited to field margins and areas of longer grassland towards the north of the Application Site near the woodland.

4.6.2. These habitats provide potential foraging, refuge and dispersal opportunities for widespread reptiles. Owing to the suitability for reptile, presence and absent surveys for reptile were conducted at the Application Site.

4.6.3. Six presence / likely absence survey visits for reptiles were subsequently completed in favourable conditions in July, August, and September 2024, a seventh survey visit was completed in July 2024, however this was completed outside of the specified temperature range and has therefore been discounted from the survey effort. The results of the surveys, as shown on Plan ECO5,

indicate that there is a presence of reptiles on-site. The results of the surveys undertaken are summarised in Table 12 below.

Table 12: Reptile Survey conditions and Results

Date	Survey	Temperature (°C)	Cloud Cover (%)	Reptiles recorded
25.07.2024	1	19	100	No reptiles recorded
15.08.2024	2	19	40	1 J slow worm
26.08.2024	3	19	10	1 F slow worm, 1 J slow worm 1 U grass snake
02.09.2024	4	19	100	No reptiles recorded
20.09.2024	5	17	30	1 J grass snake
26.09.2024	6	15	80	1 U grass snake

4.6.4. As detailed in the table above, the surveys recorded peak counts of 2 slow worm and 1 grass snake during any one survey visit.

4.6.5. **Background Records.** The data search undertaken with SBRC returned no records of reptiles within the Application Site and a total of 22 records from the local area. A total of eight records were returned for common lizard *Zootoca vivipara* the closest and most recent being recoded approximately 1.21km south of the Application Site in 2021.The closest record for slow-worm *Anguis fragilis* was recorded in 2017, approximately 1.9km south of the Application Site, 12 other records for slow worm were returned. One record of grass snake *Natrix helvetica* was returned from the same location as the lizard approximately 1.9km south of the Application Site and recorded in 2017.

4.7. Hedgehogs

4.7.1. No evidence of hedgehog *Erinaceus europaeus* was recorded invertedly on-site during the other surveys completed. While no evidence was recorded, it is considered that the habitats such as the grassland, hedgerows and woodland, are suitable for the foraging and dispersal of hedgehog and as such the occasional use by this species cannot be eliminated.

4.7.2. **Background Records.** A total of 18 records for hedgehog were returned within the search area. The closest record was for European hedgehog approximately 0.16km east of the Application Site in 2016.

4.8. Other Mammals

4.8.1. Due to the habitats present, it is considered that small common mammal species could be present, although given the widespread and common nature of the habitats and availability of suitable habitat in the wider area, it is not considered that any such species would be reliant on the Application Site.

4.8.2. The ditch present along the western boundary of the Application Site was assessed for it's potential to support water vole and otter during the survey visits in June 2024 and October 2025. Given the shaded nature of the ditch and the lack of vegetation present within it, it was not considered suitable for water vole or otter. Furthermore, no evidence of either species was recorded during these checks. No further consideration is given to otter or water vole within this report

4.8.3. **Background Records.** SBRC returned a record for brown hare *Lepus europaeus* from 2016 approximately 1.28km south east of the Application Site. Four records of European rabbit were also returned by the data search, one of which was recorded within the Application Site in 2015. No records of otter were returned by SBRC. 3 records were returned for water vole, although these are all from 2008 or prior, none of these are from within the Application Site, the closest 0.3km east of the Application Site.

4.9. Birds

4.9.1. The native hedgerows and woodland provide the greatest value for the local bird species by affording both potential nesting and foraging habitat. Similar opportunities are available in the wider area, included within the large expanse of woodland to the north of the Application Site.

4.9.2. **Background Records.** The data search carried out with SBRC returned a total of 1131 records of notable bird species from within 3km of the Application Site in the last 10 years, these records are made up of 50 different species

4.9.3. The closest records returned were from 0.16km west of the Application Site, these include records of cuckoo *Cuculus canorus*, and green woodpecker *Picus viridis* in 2020, and barn owl *Tyto alba* in 2023.

4.9.4. The following species returned from the data search are listed under either the Wildlife and Countryside Act Schedule 1 or under Section 41 of the NERC act white-tailed eagle Haliaeetus albicilla red kite *Milvus milvus*, white-fronted goose *Anser albifrons,* lapwing *Vanellus vanellus*, herring gull *Larus argentatus*, black-tailed godwit *Limosa limosa*, curlew *Numenius arquata*, turtle dove *Streptopelia turtur*, kingfisher *Alcedo atthis*, cuckoo *Cuculus canorus*, hobby *Falco subbuteo*, skylark *Alauda arvensis*, woodlark *Lullula arborea*, cetti's warbler *Cettia cetti*, corn bunting *Emberiza calandra*, yellowhammer *Emberiza citrinella*, reed bunting *Emberiza schoeniclus*, hawfinch *Coccothraustes coccothraustes*, linnet *Linaria cannabina*, bullfinch *Pyrrhula pyrrhula*, tree pipit *Anthus trivialis*, spotted flycatcher *Muscicapa striata*, marsh tit *Poecile palustris*, firecrest *Regulus*

ignicapilla, starling *Sturnus vulgaris*, house Sparrow *Passer domesticus*, dunnock *Prunella modularis*, song thrush *Turdus philomelos*, ring ouzel *Turdus torquatus*, and barn owl *Tyto alba*.

4.9.5. Other notable species recorded in the local area are as follows: mallard *Anas platyrhynchos*, mute swan *Cygnus olor*, swift *Apus apus*, common gull *Larus canus*, snipe *Gallinago gallinago*, redshank *Tringa tetanus*, stock dove *Columba oenas*, kestrel *Falco* tinnunculus, house martin *Delichon urbicum*, barn swallow *Hirundo rustica*, meadow pipit *Anthus pratensis*, grey wagtail *Motacilla cinerea*, nightingale *Luscinia megarhynchos*, wheatear *Oenanthe oenanthe*, willow warbler *Phylloscopus trochilus*, mistle thrush *Turdus viscivorus*, little grebe *Tachybaptus ruficollis*, short-eared owl *Asio flammeus*, and tawny owl *Strix aluco*.

4.10. Invertebrates

4.10.1. Given the presence of the grassland and hedgerow habitats supporting a range of common and widespread flowering species, nectar sources and fruit bearing species, the Application Site likely supports an assemblage of common invertebrate species. There is no evidence to suggest that any rare or notable species would be present.

4.10.2. **Background Records.** No invertebrate records were returned from within the Application Site, the closest record is that of small heath *Coenonympha pamphilus* recorded approximately 0.16km east of the Application Site in 2021.

4.10.3. Two species were returned from the data search under the designation Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), this included two records of purple emperor *Apatura iris*, most recently recorded in August 2018. Six records of brown hairstreak *Thecla betulae* were returned, the most recent being a record from 2021, this species is also listed under Section 41 of the NERC Act 2006.

4.10.4. Fourty-seven records of other invertebrate species listed under Section 41 of the NERC Act 2006 (as amended) were returned by the data search. This includes 7 records of small heath, one record of wall butterfly *Lasiommata megera*, eight records of knot grass moth *Acronicta rumicis*, two records of mottled rustic *Caradrina morpheus*, one record of small square-spot *Diarsia rubi*, one record of small pheonix *Ecliptopera silaceata*, one record of September thorn *Ennomos erosaria*, three records of dusky thorn *Ennomos fuscantaria*, five records of rustic moth *Hoplodrina blanda*, two records of rosy rustic *Hydraecia micacea*, two records of mullein wave *Scopula marginepunctata*, one record of shaded broad-bar *Scotopteryx chenopodiata*, two records of white ermine *Spilosoma lubricipeda*, two records of buff ermine *Spilosoma lutea*, three records of blood-vein *timandra comae*, three records of cinnabar moth *Tyria jacobaeae*, and three records of oak hook-tip *Watsonalla binaria*.

5. Ecological Evaluation

5.1. The Principles of Ecological Evaluation

5.1.1. The guidelines for ecological evaluation produced by CIEEM propose an approach that involves professional judgement, but makes use of available guidance and information, such as the distribution and status of the species or features within the locality of the project.

5.1.2. The methods and standards for site evaluation within the British Isles have remained those defined by Ratcliffe[13] . These are broadly used across the United Kingdom to rank sites so priorities for nature conservation can be attained. For example, current Sites of Special Scientific Interest (SSSI) designation maintains a system of data analysis that is roughly tested against Ratcliffe's criteria.

5.1.3. In general terms, these criteria are size, diversity, naturalness, rarity and fragility, while additional secondary criteria of typicalness, potential value, intrinsic appeal, recorded history and the position within the ecological / geographical units are also incorporated into the ranking procedure.

5.1.4. Any assessment should not judge sites in isolation from others, since several habitats may combine to make it worthy of importance to nature conservation.

5.1.5. Further, relying on the national criteria would undoubtedly distort the local variation in assessment and therefore additional factors need to be taken into account, e.g. a woodland type with a comparatively poor species diversity, common in the south of England, may be of importance at its northern limits, say in the border country.

5.1.6. In addition, habitats of local importance are often highlighted within a BAP. The Norfolk BAP has been considered as part of this assessment and is referenced where relevant.

5.1.7. Levels of importance can be determined within a defined geographical context from the immediate site or locality through to the international level.

5.1.8. The legislative and planning policy context are also important considerations and have been given due regard throughout this assessment.

5.2. Habitat Evaluation

Designated Sites

5.2.1. **Statutory Sites**. The Application Site does not fall within and is not adjacent to any statutory designated sites (see Plan ECO1).

[13] Ratcliffe, D A (1977). *A Nature Conservation Review: the Selection of Biological Sites of National Importance to Nature Conservation in Britain.* Two Volumes. Cambridge University Press, Cambridge.

Wolstonbury Hill SSSI

5.2.2. The closest designated site to the Site is Wolstonbury Hill Site of Special Scientific Interest (SSSI) located approximately 4.2km south of the Application Site. Wolstonbury Hill has been designated for its habitat features of lowland calcareous grassland and lowland mixed deciduous woodland.

Beeding Hill to Newtimber Hill SSSI

5.2.3. Beeding Hill to Newtimber Hill is an SSSI located 5.2km south of the Application Site, and also designated as a Local Wildlife Site (LWS). This site has been designated for calcareous grassland and broadleaved, mixed and yew woodland, this SSSI was also designated for it's population of Great Crested Newt.

5.2.4. **Non-statutory Sites**. There are no non-statutory designated sites within or immediately adjacent to Application Site itself, and none were returned from the data search carried out with SBRC.

Ancient Woodland

5.2.5. No Ancient Woodland is present on-site or immediately adjacent to the Application Site. The closest Ancient Woodland is located 0.17km north east of the Application Site at its closest point.

5.2.6. A number of other areas of Ancient Woodland are present within 2km of the Application Site, however these are separated from the Application Site by existing development and open countryside. The next closest block of Ancient Woodland is Sayers Common Wood, located approximately 0.37km east of the Application Site.

Habitats

5.2.7. The majority of the Application Site consists of Other Neutral Grassland which provides opportunities for a wide variety of wildlife. This grassland is extremely common and widespread and losses to this habitat in order to bring forward the Development Proposals are not considered significant. The Development Proposal seek to retain and enhance grassland at the boundaries of the Application Site, particularly at the western boundary where a wet meadow grassland mix will be sown (e.g., Emorsgate EM8 or similar) to improve species diversity and provide increased opportunities for a range of species / groups including invertebrates, reptiles and bats.

5.2.8. Boundary hedgerows provide foraging, nesting, shelter and commuting opportunities for a wide variety of faunal species. The vast majority of the boundary native hedgerows are to be retained by the Development Proposals with the only losses occurring to accommodate the access road. The Development Proposals will provide a considerable increase in hedgerow, many of which will be species-rich native hedgerows providing an increase in opportunities.

5.2.9. Lowland mixed deciduous woodland present to the northern boundary will be partially lost to bring forward the Development Proposals. The woodland lacks a developed understorey and comprises a single canopy species, The trees to be lost are young English oak's. Whilst there will be a small loss in area of woodland, the Development Proposals will enhance the retained woodland via understorey planting using a diverse mix of native species. Over time it is envisioned that appropriate management would allow other native species to form part of the lower canopy resulting in a more structurally and species diverse woodland.

5.2.10. Individual trees present are in the main young English oak's, whilst valuable for the niches they provide to a range of native invertebrate and vertebrate species, they are young and lack veteran features such as dead wood, split and holes, The losses to these trees will be mitigated for through the planting of a large number of open space and street trees of native origin. These will be a mix of mainly native species improving the species diversity within the Application Site.

5.2.11. Overall, it is considered that the Development Proposals will result in an increase in opportunities for a wide range of species through diversification of habitats.

5.3. Faunal Evaluation

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Bats

5.3.14. **Legislation**. All bats are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and included on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations"). These include provisions making it an offence to:

- Deliberately kill, injure or take (capture) bats;
- Deliberately disturb bats in such a way as to be likely to significantly affect:-
  - (i) the ability of any significant group of bats to survive, breed or rear or nurture their young; or to hibernate; or
  - (ii) to affect significantly the local distribution or abundance of the species concerned;
- Damage or destroy any breeding or resting place used by bats;
- Intentionally or recklessly obstruct access to any place used by bats for shelter or protection (even if bats are not in residence).

5.3.15. While the legislation is deemed to apply even when bats are not in residence, Natural England guidance suggests that certain activities such as re-roofing can be completed outside sensitive periods when bats are not in residence provided these do not damage or destroy the roost.

5.3.16. The words 'deliberately' and 'intentionally' include actions where a court can infer that the defendant knew 'the action taken would almost inevitably result in an offence, even if that was not the primary purpose of the act.

5.3.17. The offence of damaging (making it worse for the bat) or destroying a breeding site or resting place is an absolute offence. Such actions do not have to be deliberate for an offence to be committed.

5.3.18. Licences can be granted for development purposes by an 'appropriate authority' under Regulation 55 (e) of the Habitats Regulations. In England, the 'appropriate authority' is Natural England (the government's statutory advisors on nature conservation). European Protected Species licences permit activities that would otherwise be considered an offence.

5.3.19. In accordance with the Habitats Regulations the licensing authority (Natural England) must apply the three derogation tests as part of the process of considering a licence application. These tests are that:

- The activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety;
- There must be no satisfactory alternative; and
- The favourable conservation status of the species concerned must be maintained.

5.3.20. Licences can usually only be granted if the development is in receipt of full planning permission (and relevant conditions, if any, discharged).

5.3.21. Seven species of bat are Priority Species, these are barbastelle, Bechstein's *Myotis bechsteinii*, noctule *Nyctalus noctula*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared *Plecotus auritus*, greater horseshoe *Rhinolophus ferrumequinum* and lesser horseshoe *Rhinolophus hipposideros*.

5.3.22. **Application Site Usage**. The on-site grassland provides foraging opportunities for bat species. The on-site hedgerows and off-site and on site woodland adjacent to the northern boundary provide further foraging opportunities, alongside additional commuting and dispersal opportunities. A number of mature trees present at the boundaries of the Application Site were noted to hold potential for roosting bats (PRF-I / PRF-M). The vast majority of these are to be retained under the Development Proposals, although it is noted that T2 (See PlanECO2), which is referred to T9 in the Arboricultural Implications Report produced by SJAtrees, dated November 2025 would be lost to accommodate the vehicular access. This is discussed further below.

5.3.23. Targeted surveys carried out across the Application Site identified the presence of nine species of bat. The most abundant species recorded were common pipistrelle and soprano pipistrelle, both common and widespread species. Rarer bat species detected on site include barbastelle and greater horseshoe, albeit these species were detected at a very low rate. Greater horseshoe was recorded just once across the entirety of the bat survey work completed. Barbastelle were recorded at a higher rate although still only an average of 0.8 registrations per night in September at location 1, 3 registrations per night in August at location 1 and 0.2 registrations per night in August at location 2. No barbastelle were recorded during the NBW surveys completed across the 2024 active season and it is therefore considered that barbastelle are not roosting within the Application Site, only using the boundary vegetation to commute to more suitable foraging grounds offsite.

5.3.24. **Mitigation / Recommendations**. The grassland present within the Application Site provides some foraging opportunities for local bat species, with the native hedgerows and woodland providing further foraging, commuting and dispersal opportunities. The main habitat of interest is the woodland to the north and hedgerow with trees to the west of the Application Site, the night bat walkover surveys recorded higher levels of activity in this area of the Application Site. The static detector surveys also recorded higher level of activity on the detector placed on the northern boundary of the Application Site compared to the detector placed on the southern boundary. Although it is noted that barbastelle activity whilst a tiny percentage of the overall number of registrations was more frequently recorded by detectors placed on the southern boundary.

5.3.25. Tree T2 to be lost under the Development Proposals are noted to be a PRF-I tree, holding roosting potential for individual / small numbers of bats. As such, it is recommended that T2 be felled under a soft-fell methodology, with potential bat roosting features carefully removed and lowered to the ground by an experienced arborist. The feature(s) will then be left facing upward for at least 24 hours before being removed.

5.3.26. The habitats that offer the greatest interest for bats, such as the native hedgerows, would be mostly retained and protected throughout the construction phase of the development. Losses to woodland to bring forward the Development Proposals would be mitigated for through enhancement of the retained woodland and creation of other species-rich habitats including grassland, pond and scrub as well as the provision of a large number of individual tree planting. The Development Proposals will provide additional opportunities for bats by improving the species diversity of the habitats within the Application Site resulting in diversification of invertebrates present within the Application Site.

5.3.27. The development will adhere to the Bat Conservation Trust and Institute of Lighting Professionals (ILP) Guidance Note 08/23 Bats and Artificial Lighting at Night to limit light spill onto the retained suitable habitats for bats including hedgerows and woodland and suitable offsite habitats including the woodland to the north. The lighting strategy prepared by Enerveo shows that dark corridors will be implemented along the northern, western and southern boundaries to avoid any lighting impacts on the commuting and foraging opportunities present with the Application Site. The lighting strategy has also been designed

to prevent illumination of the large number of trees with PRF's along the southern boundary.

5.3.28. A number of bat boxes both integrated within proposed buildings and installed on retained mature trees will be provided as part of the Development Proposals (e.g., 32) See appendix 2 for suitable examples.

5.3.29. The following recommendations will be implemented in respect of bat boxes to maximise the chances of box adoption by bats:

- Boxes will be located close to suitable foraging and / or dispersal habitats;
- The flight-path leading to and from each bat box will be kept clear, with no significant barriers such as tree branches;
- Boxes will be positioned so that they are sheltered from wind, rain and strong sunlight, with a typical orientation of south-west through south to south-east; and
- Boxes on buildings will be placed over three metres from the ground to limit disturbance (with some boxes erected above five metres where feasible to make them attractive to different species).

Hedgehogs

5.3.30. **Legislation**. Hedgehog is a species of principal importance for the conservation of biodiversity under Section 41 (England) of the NERC Act 2006.

5.3.31. The NERC Act 2006 requires the Secretary of State to:

> **… take such steps as appear… to be reasonably practicable to further the conservation of the living organisms and types of habitat included in any list published under this section, or… promote the taking by others of such steps.**

5.3.32. **Application Site Usage**. While no evidence was recorded while undertaking the suite of survey work in 2024 and 2025, use of the Application Site by this species cannot be ruled out. Therefore precautionary mitigation measures are recommended below.

5.3.33. **Mitigation / Recommendations**. Clearance of suitable vegetation, such as the grassland and hedgerows bases will not be completed during the hibernation season (October to February inclusive) Any vegetation clearance of these habitats completed during the active season should be carried out in a systematic and controlled manner to allow hedgehogs to disperse.

5.3.34. If in the event a hedgehog is found during construction works it should be allowed to disperse on its own. If the hedgehog does not disperse and is in danger of being harmed, as a last resort it should be carefully placed in a lidded box (with air holes and vegetation cover) and safely translocated to an area of retained vegetation or within suitable off-site habitats away from construction areas.

5.3.36. The vast majority of hedgerows will be retained ensuring that commuting routes for hedgehogs are also maintained. Furthermore species-rich habitats of value to hedgehogs including grassland, scrub and native hedgerow planting will offer increased shelter and foraging opportunities for hedgehogs and other wildlife.

5.3.37. It is recommended that new fences include hedgehog gateways (13cm x 13cm) gaps at the base to facilitate passage of the species. This will allow for continued dispersal of Hedgehog across the site and between on-site and off-site habitats.

Other Mammals

5.3.38. **Legislation**. Common mammals receive protection under the Wild Mammals (Protection) Act 1996 making it an offence to crush or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

5.3.39. This also extends to the Animal Welfare Act 2006 making it an offence to cause unnecessary suffering or fail to meet the needs of vertebrates in the temporary control of man.

5.3.40. **Application Site Usage**. The Application Site provides suitable foraging and commuting opportunities for several common mammal species.

5.3.41. **Mitigation and Enhancement Measures**. General regard to mammals following standard practise is recommended to avoid unnecessary harm and distress when undertaking site clearance works. Any common mammals found, which are not in distress, will be encouraged to disperse to the wider area where suitable habitat is present outside of work zones (same methodology as for hedgehogs).

5.3.42. New landscaping will provide new shelter and foraging opportunities for locally present mammals.

Birds

5.3.43. **Legislation**. Section 1 of the Wildlife and Countryside Act 1981 (as amended) is concerned with the protection of wild birds, whilst Schedule 1 lists species that are protected by special penalties. All species of birds receive general protection whilst nesting.

5.3.44. **Application Site Usage**. The majority of grassland is of lower suitability for ground nesting birds given it's regular management. The hedgerows at the boundaries of the Application Site, individual trees, and woodland provide nesting and foraging opportunities for a range of common and widespread bird species.

5.3.45. **Mitigation / Recommendations**. In order to avoid impacts on nesting birds, and to avoid a potential offence under the Wildlife and Countryside Act 1981 (as amended), clearance of vegetation that is suitable for nesting birds (hedgerows for access provision and small number of woodland trees) should be undertaken outside of the nesting season (typically March to August inclusive) wherever possible. Where this cannot be achieved, a nest-check survey for birds should be undertaken by an ecologist immediately prior to vegetation removal. If any nests are confirmed, works should cease immediately, with the nest safeguarded by buffer of at least 5m to be determined by the ecologist within which damaged / destructive works will not recommence until the young have fledged and the nest is no longer active.

5.3.46. The Development Proposals contain provision of large areas of new habitats of value to foraging and nesting birds, including orchard planting, species-rich grassland, native hedgerow and scrub planting. The area of standing water will also provide a drinking resource. The Development Proposals will result in an increase in the diversity of foraging opportunities within the Application Site through selection of a large number of fruit and berry producing native species.

5.3.47. The Development Proposals will provide additional nesting opportunities for birds via inclusion of a number of integrated and free hanging bird boxes installed / fixed in suitable locations within the make up of proposed buildings and on mature retained trees at the boundaries of the Application Site and within the retained woodland. It is recommended that 32 nest boxes comprising a mix of general purpose boxes, sparrow terraces and swift bricks are provided (see Appendix 4 for examples).

Reptiles

5.3.48. **Legislation**. All six British reptile species receive a degree of legislative protection that varies depending on their conservation importance.

5.3.49. Rare, endangered or declining species receive 'full protection' under the Wildlife and Countryside Act 1981 (as amended) as well as protection under the Conservation of Habitats and Species Regulations 2017 (as amended). Species that are fully protected are Smooth Snake *Coronella austriaca* and Sand Lizard *Lacerta agilis*. These receive the following protection from:

- Killing, injuring and taking;
- Possession or control (of live or dead animals, their parts or derivatives);
- Damage to, destruction of and obstruction of access to any structure or place used for shelter or protection;
- Disturbance of any animal occupying such a structure or place; and
- Selling, offering for sale, possession or transport for purposes of sale (live or dead animal, part or derivative).

5.3.50. Owing to their widespread distribution in Britain, common Lizard, slow worm, grass snake and adder *Vipera berus* are only 'partially protected' under the

Wildlife and Countryside Act 1981 (as amended) and as such only receive protection from:

- Deliberate killing and injuring; and
- Being sold or other forms of trading.

5.3.51. Therefore, if reptiles are present within a site, a suitable mitigation strategy should be implemented to avoid the offence of killing / injury.

5.3.52. **Application Site Usage**. Presence / absence reptile surveys were conducted within the Application Site along the field margins and areas of longer grassland towards the north in July, August and September 2024. These targeted surveys recorded that grass snake and slow-worm are present within the Application Site, albeit in low numbers.

5.3.53. **Mitigation / Recommendations**. The proposals would have the potential to directly impact upon reptiles during site clearance and construction operations. Given the presence of reptiles within the Application Site, a mitigation strategy is required to ensure that the Wildlife and Countryside Act 1981 (as amended) is not contravened and no harm or death to reptiles occur.

5.3.54. Given reptiles have mostly been recorded towards the north of the Application Site with one slow worm recorded along the southern boundary, it is considered that sensitive removal of suitable habitat under a directional staged cut methodology will be sufficient to avoid significant impacts to the local reptile population.

5.3.55. The directional staged cut methodology will comprise an initial cut no lower than 150mm, with a follow-up cut completed at least 24 hours later as close to ground level as possible. The cuts will be completed towards retained suitable habitat to ensure that any reptiles present can move freely into suitable habitats and are not injured / killed. Clearance to suitable reptile habitat will be completed during the suitable weather conditions for reptiles (generally March – October inclusive).

5.3.56. The species-rich grassland, scrub, hedgerows and planting associated with the proposed waterbody / attenuation feature will provide increased foraging, refuse and basking opportunities for widespread reptiles. Furthermore, it is recommended that several log piles (e.g., 2) be created and maintained within the Application Site to increase refuge and foraging opportunities for reptiles. These can be created using the arisings of necessary arboricultural works including thinning, coppicing, clearance etc.

5.3.57. It is recommended that at least one grass snake egg laying Application Sites is created within the Application Site. These would comprise piles of organic material suitable for grass snakes placed in close proximity to the proposed waterbody. Piles will be constructed with a base of brash with grass cuttings layered on top and should ideally be at least 2m x 2m x 1m in size. The piles will be situated in a sunny location and well connected to suitable commuting and foraging habitat for the species. Piles should be topped up using arisings from the Application Site during the period April – May.

5.3.58. Carpet or tarpaulin could be used to hold the pile in place and provide a heat source on sunny days.

5.3.59. The management regimes of these new species-rich habitats should be designed with reptiles in mind, with areas of longer grassland encouraged, thus offering a variety of foraging and basking opportunities.

Amphibians (Including Great Crested Newts)

5.3.60. **Legislation**. Great crested newts (GCN) are subject to the same legislative protection and licensing provisions as bats (see above).

5.3.61. Other species of amphibian including the common toad, common frog, palmate newt *Lissotriton helveticus* and smooth newt are all afforded protection against sale only under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). common toad are further protected under Section 41 of the NERC Act 2006 (as amended). Where significantly large populations of common toad are identified at a site, their presence could be deemed as a 'material consideration' by planning authorities in accordance with National Planning Policy Framework (NPPF) and their listing on the UKBAP and measures to protect them are recommended.

5.3.62. **Application Site Usage**. The presence of GCN within the Application Site has been scoped out and therefore no mitigation is considered necessary for this species. The Application Site offers some limited potential for more common and widespread amphibians such as common frog and common toad, however similar opportunities are also present in abundance in the wider area.

5.3.63. Nonetheless, the Development Proposals will provide an increase in opportunities for any widespread amphibians in the form of new species-rich grassland (some seasonally wet), scrub and hedgerow planting as well as the waterbody and marginal planting associated with this.

Invertebrates

5.3.64. **Application Site Usage**. It is expected that an assemblage of common invertebrate species utilise the on-site habitats. There is no reason to suspect the likely presence of any scarce or notable invertebrate species.

5.3.65. **Mitigation / Recommendations**. Proposed landscaping includes new species-rich native hedgerows, grassland, scrub and native fruit bearing trees. Native species are known to support a greater assemblage of invertebrates and will in turn support other wildlife, for example foraging bats. The inclusion of new introduced shrub, whilst not native, will still increase the floristic diversity on-site and partially contribute to invertebrate opportunities.

5.3.66. The further provision of insect nesting aids of varying models in selected areas of proposed landscaping would provide suitable refuge opportunities for solitary bees, butterflies, saproxylic (beetles) and other invertebrate species. It is therefore recommended that a number of insect houses and bee bricks are implemented in appropriate locations to provide additional opportunities for invertebrates (see Appendix 5 for examples).

6. Planning Policy Context

6.1. The planning policy framework that relates to nature conservation at the Application Site, is issued at two main administrative levels: nationally through the NPPF and locally through the Mid Sussex District Plan and The Hurstpierpoint and Sayers Common Neighbourhood Plan. The proposed development will be judged in relation to the policies contained within these documents that concern nature conservation.

6.2. National Policy

National Planning Policy Framework, December 2024 (amended February 2025)

6.2.1. Guidance on national policy for biodiversity and geological conservation is provided by the NPPF, published in March 2012, revised on 24 July 2018 and updated on 19th February 2019, 20th July 2021, 5th September 2023, 20th December 2023 and 12th December 2024. It is noted that the NPPF continues to refer to further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system provided by Circular 06/05 (DEFRA / ODPM, 2005) accompanying the now-defunct Planning Policy Statement 9 (PPS9).

6.2.2. The key element of the NPPF is that there should be "a presumption in favour of sustainable development" (paragraph 11). It is important to note that this presumption "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" (paragraph 195). 'Habitats site' has the same meaning as the term 'European site' as used in the Habitats Regulations 2017.

6.2.3. Hence the direction of Government policy is clear; that is, the presumption in favour of sustainable development is to apply in circumstances where there is potential for an effect on a European site, if it has been shown that there will be no adverse effect on that designated site as a result of the development in prospect.

6.2.4. A number of policies in the NPPF are comparable to those in PPS9, including reference to minimisation of impacts to biodiversity and provision of net gains to biodiversity where possible (paragraph 187).

6.2.5. The NPPF also considers the strategic approach that Local Authorities should adopt with regard to the protection, maintenance and enhancement of green infrastructure, priority habitats and ecological networks, and the recovery of priority species.

6.2.6. Paragraph 193 of the NPPF comprise a number of principles that Local Authorities should apply, including encouraging opportunities to incorporate biodiversity in and around developments; provision for refusal of planning

applications if significant harm cannot be avoided, mitigated or compensated for; applying the protection given to European sites to potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified (or required) as compensatory measures for adverse effects on European sites; and the provision for the refusal for developments resulting in the loss or deterioration of 'irreplaceable' habitats – unless there are 'wholly exceptional reasons' (for instance, infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists.

6.2.7. National policy therefore implicitly recognises the importance of biodiversity and that with sensitive planning and design, development and conservation of the natural heritage can co-exist and benefits can, in certain circumstances, be obtained.

6.3. Local Policy

Mid Sussex District Plan (2014 – 2031)

6.3.1. The Mid Sussex District Plan 2014-2031 was adopted in March 2018 to replace the majority of the Mid Sussex Local Plan adopted in 2004. The Mid Sissex District Plan is the foundational document for how Mid Sussex wants to evolve and sets out a delivery strategy. Relevant nature conservation policies from this document are detailed individually below.

6.3.2. **DP37: Trees, Woodland, and Hedgerows.** This policy recognises the valuable landscape made up by trees, woodland, and hedgerows, it aims to protect these landscapes for their visual, historical, and biodiversity features. This policy also aims to create and maintain easily accessible green infrastructure, green corridors and spaces to act as wildlife corridors. Trees, woodland, and hedgerows are to be protected and enhanced during development.

6.3.3. **DP38: Biodiversity.** This policy recognises the importance of conserving, protecting and enhancing areas of importance for biodiversity and nature conservation. This policy states that developments must contribute to improving, enhancing, managing, and restoring biodiversity so there is a net gain in biodiversity, protect existing biodiversity, minimise species and habitat fragmentation, promote restoration and expansion of priority habitats, and avoid damage to any designated area.

The Hurstpierpoint and Sayers Common Neighbourhood Plan

6.3.4. The Hurstpierpoint and Sayers Common Neighbourhood Plan applies to the whole Parish area for the period from 2014 to 2031. It also referred to as Parish 2031. The Neighbourhood Plan was adopted in March 2015. It again contains several policies relevant to nature conservation issues.

6.3.5. Policy Countryside Hurst C2 requires development within the South Downs National Park to conserve and enhance the wildlife value of the National Park.

6.3.6. Policy Countryside Hurst C6 relates to Little Park and Tilleys Copse Woodland and states that this woodland will be permanently protected and conserved by the creation of a management trust.

6.3.7. Policy House Hurst H6 references the need for ecological survey and appropriate mitigation and enhancement measures to be undertaken.

6.4. Discussion

6.4.1. The development of the Application Site is not likely to have a significant adverse effect on designated sites in the locality. The Development Proposals have been designed to deliver the appropriate ecological mitigation and enhancements to support local wildlife and biodiversity. Following the recommendations and enhancements within this report, it is considered that the Development Proposals at the Application Site would be in accordance with relevant planning policy at the national and local level.

7. Summary and Conclusions

7.1. Ecology Solutions was commissioned in April 2024 to undertake an Ecological Assessment of Land to the West of Kings Business Centre, Reeds Lane, Sayers Common.

7.2. The Application Site was surveyed in June 2024 and October 2025 based on UK Habitat Classification (UKHab) methodology and appraised for protected and notable species suitability.

7.3. The Application Site consists primarily of other neutral grassland with areas of scrub and woodland to the north of the Application Site, the woodland extends beyond the northern boundary. Two native hedgerows with trees are present along the southern and western boundaries, along with a number of individual trees on site.

7.4. **Statutory Sites**. There are no statutory designated sites within or directly adjacent to the Application Site boundary. Wolstonbury Hill SSSI is the closest statutory designated site located approximately 4.2km south of the Application Site. Other statutory sites include Beeding Hill to Newtimber Hill SSSI which is located 5.2km south of the Application Site. No impacts are expected given the nature of the Development Proposals and the distance from any such site.

7.5. **Non-statutory Sites**. There are no non-statutory designated sites within or immediately adjacent to the Application Site itself. The Development Proposals would not have any impact on any such site.

7.6. **Ancient Woodland.** The closest parcel of Ancient Woodland known is located 0.17km north east of the Application Site at its closest point. Given the nature of the proposals, the Development Proposals would not have an impact on any Ancient Woodland.

7.7. **Habitats**. The Application Site comprises a range of common and widespread habitats; however, these are of interest, largely due to the opportunities they offer wildlife rather than any intrinsic value.

7.8. Relatively valuable native hedgerows will be retained as part of the scheme and extended with further species-rich native hedgerow and tree planting, creation / enhancement of grassland and enhancement to retained woodland will aid in increasing the floral diversity of the Application Site and heighten nectar resource for invertebrates.

[redacted]

7.12. **Bats**. The Application Site is noted to be used by a range of mainly common and widespread species. All trees on and directly adjacent to Application Site were

appraised for their suitability to support roosting bats during the walkover in July 2024. A number of trees were noted to hold potential to support roosting bats, these will mostly be retained by the Development Proposals and the lighting strategy will ensure that these are not impacted by lighting. A single tree with potential (PRF-I) should be subject to a soft fell methodology.

7.13. A number of bat boxes (e.g., 32) will be provided comprising both building integrated boxes and free hanging boxes deployed on mature retained trees.

7.14. **Hedgehog**. No evidence of hedgehog was recorded on-site in June 2024. While no evidence was recorded, it is considered that the habitats on site such as the other neutral grassland, hedgerows, and treeline, are suitable for the foraging and dispersal of hedgehog. It is known that the species is present in the local area and as such the occasional use by this species cannot be eliminated.

7.15. Any clearance of suitable habitat for Hedgehog such as the hedgerows, will be subject to inspection to ensure that the species is absent, while any vegetation clearance should be carried out in a systematic and controlled manner to allow hedgehogs to disperse. Trenches or deep pits associated with construction that are to be left open overnight should also be provided with a means of escape in case a hedgehog enters.

7.16. **Other Mammals**. Due to the habitats present, it is considered that small common mammal species could be present, but none of these are likely to be notable species given the habitats present.

7.17. **Birds**. The existing native hedgerows with trees, woodland, and individual trees provide opportunities for the foraging and nesting of common bird species.

7.18. The Development Proposals will retain most of these native hedgerows with trees, therefore retaining nesting opportunities for birds. New species-rich hedgerow planting and native fruit tree planting will ensure opportunities for foraging and nesting birds are increased post-development.

7.19. Any clearance of suitable bird nesting habitat should take place outside the nesting bird season (March to September inclusive), or only during this period following a nesting bird check to confirm no active nests are present in order to avoid a potential offence under the legislation.

7.20. The inclusion of a number of new bird boxes (e.g., 32) to be integrated within the newly constructed buildings and deployed on mature retained tree will elevate nesting potential post-development.

7.21. **Reptiles**. Targeted surveys for common reptile species within suitable habitats were undertaken in July, August and September 2024. These targeted surveys recorded the likely low population of reptile species within the Application Site.

7.22. A mitigation strategy involving sensitive removal of suitable habitat under a directional staged cut methodology will be sufficient to avoid significant impacts to the local reptile population.

7.23. **Amphibians**. eDNA surveys of an onsite ditch and two offsite waterbodies found no presence of GCN, given the result of these surveys, a detailed desk study exercise and review of records from the local area GCN are not considered to be a constraint. Other amphibians such as common frog and common toad are

likely present within the Application Site although similar opportunities are available in the wider area.

7.24. **Dormouse.** Surveys for Dormouse were carried out monthly from July until November 2024. These surveys did not confirm any presence of Dormouse at the site. The data search also returned no records of Dormouse.

7.25. **Invertebrates**. It is expected that an assemblage of common invertebrate species utilise the on-site habitats and there is no reason to suspect the likely presence of any scarce or notable invertebrate species.

Plans

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PLAN ECO1

Application Site Location and Ecological Designations

KEY:

- Application Site Boundary
- Sites of Special Scientific Interest (SSSI)
- Ancient Woodland

N

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PLAN ECO1: Application Site Location and Ecological Designations

Rev: A
Nov 2025

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PLAN ECO2

Ecological Features

KEY:

- Application Site Boundary
- Other Neutral Grassland (Medium Distinctiveness)
- Bramble Scrub (Medium Distinctiveness)
- Lowland Mixed Deciduous Woodland (High Distinctiveness)
- Spoil mound
- Native Hedgerow with Trees (Medium Distinctiveness)
- Individual Rural Trees (Medium Distictiveness)
- Tree classified PRF-I
- Tree classified PRF-M

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PLAN ECO2: Ecological Features

Rev: A
Nov 2025

PLAN ECO3a

Night Bat Walkover Results 25.07.2024

KEY:

- Application Site Boundary
- Common Pipistrelle
- Soprano Pipistrelle
- Noctule
- Myotis Sp.

N

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PLAN ECO3a: Night Bat Walkover Results 25.07.2024

Rev: A
Nov 2025

PLAN ECO3b

Night Bat Walkover Results 26.08.2024

KEY:

- Application Site Boundary
- Common Pipistrelle
- Soprano Pipistrelle
- Noctule
- Myotis Sp.

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PLAN ECO 3b: Night Bat Walkover Results 26.08.2024

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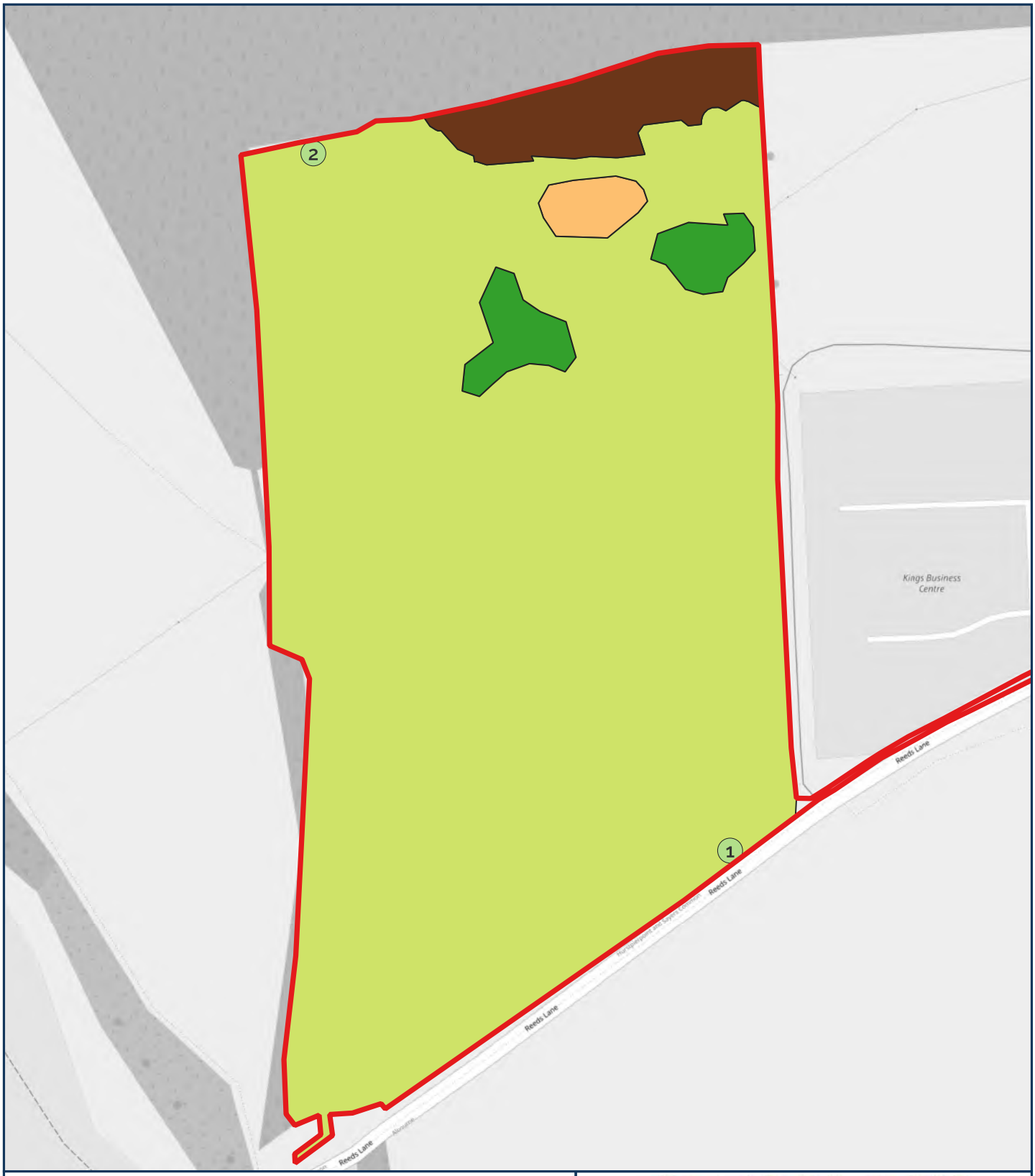
PLAN ECO4

Automated Detector Positions



KEY:

Application Site Boundary

Statics Detector Positions

N

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PLAN ECO4: Static Detector Positions

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Nov 2025

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PLAN ECO5

Reptile Survey Results

KEY:

- Application Site Boundary
- F Slow Worm
- J Slow Worm
- J Grass Snake
- U Grass Snake

N

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PLAN ECO5: Reptile Survey Results

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Nov 2025

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PLAN ECO6

Waterbodies Subject to eDNA Survey

KEY:

- Application Site Boundary
- Waterbody

N

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PLAN ECO6: Waterbodies Subject to eDNA Surveys

Rev: A
Nov 2025

Appendices

APPENDIX 1

Photographs

Photograph 1 – The other neutral grassland facing east from the west

Photograph 2 – Lowland mixed deciduous woodland

Photograph 3 – Hedgerow one

Photograph 4 – Hedgerow two

Photograph 5 – Mixed scrub in centre of the Site

Photograph 6 – Off site pond subject to eDNA (P9)

Photograph 7 – Southeast corner of the Site

Photograph 8 – ditch running along hedgerow two (P1) – taken in October 2025

Photograph 9 – Hedgerow one from off-site road to the south of the Site

Photograph 10 – Spoil mound and group of trees

Photograph 11 – Modified grassland verge to south of King Business Centre.

APPENDIX 2

Great Crested Newt eDNA Results

Folio No: 2718-2024
Purchase Order: 3793
Contact: WildCare
Issue Date: 12.07.2024
Received Date: 01.07.2024

GCN Report

Technical Report

SureScreen Scientifics

Folio No: 2718-2024
Purchase Order: 3793
Contact: WildCare
Issue Date: 12.07.2024
Received Date: 01.07.2024

SureScreen Scientifics

GCN eDNA Analysis

Summary

When great crested newts (GCN), *Triturus cristatus* , inhabit a pond, they continuously release small amounts of their DNA into the environment. By collecting and analyzing water samples, we can detect these small traces of environmental DNA (eDNA) to confirm GCN habitation or establish GCN absence.

Results

Lab ID	Site Name	OS Reference	Inhibition Check	Result	Positive Replicates	Degradation Check
3087	Sayers Common, P9		Pass	Negative	0/12	Pass
3088	Sayers Common, P1		Pass	Negative	0/12	Pass
3153	Sayers Common, P8		Pass	Negative	0/12	Pass

Matters affecting result: none

Reported by: Daisy Chambers

Approved by: Jennifer Higginbottom

Folio No:	2718-2024
Purchase Order:	3793
Contact:	WildCare
Issue Date:	12.07.2024
Received Date:	01.07.2024

Methodology

The samples detailed above have been analyzed for the presence of GCN eDNA following the protocol stated in DEFRA WC1067 'Analytical and methodological development for improved surveillance of the Great Crested Newt, Appendix 5.' (Biggs et al. 2014). Each of the 6 sub-sample tubes are first centrifuged and pooled together into a single sample tube which then undergoes DNA extraction. The extracted sample is then analyzed using real-time PCR (qPCR), which uses species-specific molecular markers to amplify GCN DNA within a sample. These markers are unique to GCN DNA, meaning that there should be no detection of closely related species.

If GCN DNA is present, the DNA is amplified up to a detectable level, resulting in positive species detection. If GCN DNA is not present then amplification does not occur, and a negative result is recorded. Analysis of eDNA requires attention to detail to prevent the risk of contamination. True positive controls, negative controls, and spiked synthetic DNA are included in every analysis and these have to be correct before any result is declared and reported. Stages of the DNA analysis are also conducted in different buildings at our premises for added analytical security.

SureScreen Scientifics Ltd is ISO9001 accredited and participates in Natural England's proficiency testing scheme for GCN eDNA testing.

Interpretation of Results

Sample Integrity Check: When samples are received in the laboratory, they are inspected for any tube leakage, suitability of sample (not too much mud or weed etc.) and absence of any factors that could potentially lead to inconclusive results. Any samples which fail this test are rejected and eliminated before analysis.

Degradation Check: **Pass/Fail**. Analysis of the spiked DNA marker to see if there has been degradation of the kit or sample between the date it was made to the date of analysis. Degradation of the spiked DNA marker may lead indicate a risk of false negative results.

Inhibition Check: **Pass/Fail.** The presence of inhibitors within a sample is assessed using a DNA marker. If inhibition is detected, samples are purified and re-analyzed. Inhibitors cannot always be removed, if the inhibition check fails, the sample should be re-collected.

Result: **Presence of GCN eDNA (Positive/Negative/Inconclusive)**
Positive: GCN DNA was identified within the sample, indicative of GCN presence within the sampling location at the time the sample was taken or within the recent past at the sampling location.
Positive Replicates: Number of positive qPCR replicates out of a series of 12. If one or more of these are found to be positive the pond is declared positive for GCN presence. It may be assumed that small fractions of positive analyses suggest low level presence, but this cannot currently be used for population studies. In accordance with the WC1067 Natural England protocol, even a score of 1/12 is declared positive. 0/12 indicates negative GCN presence.
Negative: GCN eDNA was not detected or is below the threshold detection level and the test result should be considered as evidence of GCN absence, however, does not exclude the potential for GCN presence below the limit of detection.
Inconclusive: Controls indicate inhibition or degradation of the sample, resulting in the inability to provide conclusive evidence for GCN presence or absence.

APPENDIX 3

Suitable Bat Box Examples

Bat Boxes

Habibat Bat Box (Rendering)

The Habibat Bat Box is a large, solid box made of insulating concrete with an internal roost space, which can be incorporated into the fabric of a building as it is built or renovated. A variety of facings can be fitted to suit any existing brick, wood, stonework or rendered finish, rendering the box unobtrusive and aesthetically pleasing.

The Habibat box is suitable for species which are commonly found roosting in buildings in the UK.

Height: 440mm, Width: 215mm, Depth: 102mm, Weight: 8kg

Please note that the Habibat box should be located on southerly aspects and positioned ideally near the eaves or gable apex of the property with a minimum of 2m but preferably 5-7m above the ground. Placement above windows, doors and wall climbing plants should be avoided.

Habitat Bat Box 001

The Habibat Bat Box is a large, solid box made of insulating concrete with an internal
roost space, which can be incorporated into the fabric of a building as it is built or renovated
The Habibat box is suitable for species which are most commonly found roosting in buildings in the UK, such as Pipistrelle, Natterer's, Whiskered, and Brandt's bats.

Dimensions: 21.5 x 10.2 x 44 cm (L x W x H)

Ibstock Bat Box C

If you would like to accommodate crevice dwelling bats, like pipistrelles, in new builds then the Ibstock Enclosed Bat Box 'C' is a solution that can be integrated directly into the brickwork to produce a discrete but attractive home for bats.

215 x 215 mm / 215 x 290 mm

Please note that this box is designed to be installed flush with a wall.

Images and text adapted from manufacturer's websites:

www.ibstock.com/eco-products
www.habibat.co.uk

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Bat Boxes

Schwegler bat boxes are made from ‘woodcrete’ and have the highest rates of occupation of all types of box.
The 75% wood sawdust, clay and concrete mixture is ideal, being durable whilst allowing natural respiration and temperature stability. These boxes are rot and predator proof and extremely long lasting.
Boxes can be hung from a branch near the tree trunk or fixed using ‘tree-friendly’ aluminum nails.

1FF Bat Box

The rectangular shape makes the 1FF suitable for attaching to the sides of buildings or in sites such as bridges, though it may also be used on trees. It has a narrow crevice-like internal space to attract Pipistrelle and Noctule bats.

Woodcrete (75% wood sawdust, concrete and clay mixture)
Width: 27cm
Height: 43cm
Weight: 8.3kg

2FN Bat Box

A large bat box featuring a wide access slit at the base as well as an access hole on the underside. Particularly successful in attracting Noctule and Bechstein’s bats.

Woodcrete construction, 16cm diameter, height 36cm.

2F Bat Box

A standard bat box, attractive to the smaller British bat species. Simple design with a narrow entrance slit on the front.

Woodcrete construction, 16cm diameter, height 33cm.

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Images and text adapted from manufacturer’s website: *https://www.schwegler-natur.de/fledermaus/?lang=en*

APPENDIX 4

Suitable Bird Box Examples

Bird Boxes

Schwegler bird boxes have the highest rates of occupation of all types of box.
They are designed to mimic natural nest sites and provide a stable environment with the right thermal properties for chick rearing and winter roosting.
Boxes are made from 'Woodcrete'. This 75% wood sawdust, clay and concrete mixture is breathable and very durable making these bird boxes extremely long lasting.

1B Bird Box

This is the most popular box for garden birds and appeals to a wide range of species. The box can be hung from a branch or nailed to the trunk of a tree with a 'tree-friendly' aluminium nail.

Available in four colours and three entrance hole sizes. 26mm for small tits, 32mm standard size and oval, for redstarts.

1N Deep Nest Box

A deeper than standard nest box which is ideal for robins, spotted flycatchers, pied wagtails, tits and sparrows. Its depth offers protection from cats, magpies, jays and martens.

2 *Entrance holes, 30 x 50mm. Nesting area 15 x 21cm.*

2M Bird Box

A free-hanging box offering greater protection from predators.

Supplied complete with hanger which loops and fastens around a branch.

With standard general-purpose 32mm diameter entrance hole.

Schwegler boxes have the highest occupation rates of all box types. They are carefully designed to mimic natural nest sites and provide a stable environment for chick rearing and winter roosting. They can be expected to last 25 years or more without maintenance.

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APPENDIX 5

Suitable Insect House / Bee Brick Examples

Insect Boxes

Vivarapro Woodstone Insect Block

The Woodstone Insect Block is comprised of WoodStone ®, a combination of concrete and wood fibres forming a very durable material which requires little maintenance.

The block is designed to provide habitat for a range of solitary bees as well as ladybirds and lacewings.

The block requires very little maintenance, with replacement of the bamboo tubes only if they have been pulled out or have degraded. The block should be placed in a sunny location facing south and near to adjacent flowers.

The block can be mounted on posts or poles, as well as being built into walls (with removal of the fixings).

Dimensions
Height: 27cm
Width: 18.5cm
Depth: 9cm
Weight: 3.2kg

Duo-Insect and Ladybird House

The Duo-Insect and Ladybird House is built using FSC certified wood and provides shelter for hibernating ladybirds as well as opportunities for nesting solitary bees.

The insect house can be mounted on suitable trees preferably in an area that gets morning sun.

Dimensions
Height: 35cm
Width: 24cm
Depth: 18cm

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Images and text adapted from manufacturer's website: *https://www.vivarapro.co.uk/product-category/insects/*
https://www.birdfood.co.uk/duo-insect-ladybird-house-green-roof

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