



PRELIMINARY ECOLOGICAL APPRAISAL

**Birchgrove Farmhouse
Birchgrove Lane
Horstead Keynes
Sussex
RH17 7BT**

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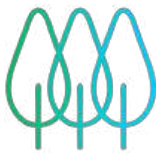
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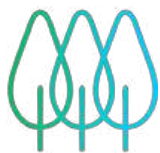


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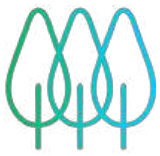


1 EXECUTIVE SUMMARY

PJC Consultancy Ltd was commissioned by Mr David Shankland to provide a Preliminary Ecological Appraisal in support of the proposed development at Birchgrove Farmhouse Barns, Horstead Keynes, Sussex, RH17 7BT. The purpose was to classify the habitats present, highlight the potential of the site to support protected species, and recommend suitable avoidance, mitigation, compensation and ecological enhancement measures where appropriate. When implemented successfully, these recommendations will ensure that the development proceeds in line with all relevant laws pertaining protected species and their habitats, as well as contributing to an increase in site biodiversity. This report has been produced in accordance with the National Planning Policy Framework (NPPF) (2024) – more specifically Chapter 15 ‘Conserving and Enhancing the Natural Environment’), as well as the Mid Sussex District Plan 2014-2031 (Mid Sussex District Council, 2018).

Based on current proposals, the results of the Preliminary Ecological Appraisal can be summarised in the following table:

Protected Species/Habitats	Suitable Habitat Present	Recommended Further Surveys	Ecological Avoidance and Mitigation
Statutory Designated Sites	Ashdown Forest Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) and SPA (Special Protection Area), situated approximately 360m east of the Site.	None required.	Adverse effects upon Ashdown Forest SSSI, SAC and SPA and their qualifying criteria for designation are not considered likely. However, the Site is located within an impact risk zone for Ashdown Forest SAC and SPA and the proposed development has the potential to increase recreational pressure on the designated sites. The LPA and developer therefore has a duty to consult Natural England for advice on the development and how potential impacts on the Ashdown Forest SAC and SPA might be avoided or mitigated against.
Bats (Roosting)	Building B1 was confirmed as a brown long-eared bat roost and was identified as having moderate suitability to support hibernating bats. Building B2 was classified as having moderate summer suitability and low hibernation suitability to support roosting bats.	Three bat emergence/re-entry surveys should be undertaken on building B1 and two undertaken on building B2, between May and September inclusive. Two hibernation checks; one in mid-January and one in	Suitable hibernation features, such as lifted roof tiles, should be reinstated into the building during the conversion works. Further requirements for mitigation, compensation and/or licences may be required for bats depending on the results of the recommended further surveys.



		mid-February should be undertaken on building B1. An automated static detector should also be installed in building B1 between November and March inclusive.	
	Tree T1 was identified as having PRF-I suitability to support roosting bats.	None required providing the avoidance and mitigation measures are adhered to.	An aerial roost inspection of tree T1 should be undertaken immediately prior to felling or pruning (if required) either by a suitability licenced ecologist, or under the supervision of a suitability licenced ecologist.
Bats (Foraging and Commuting)	The Site was identified as having low habitat suitability to support commuting and foraging bats.	None required providing the avoidance and mitigation measures are adhered to.	A sensitive lighting mitigation strategy should be adhered to throughout all phases of the proposed development.
Badgers	The Site was considered to provide some limited foraging and commuting opportunities for badgers.	None required providing the avoidance and mitigation measures are adhered to.	A pre-works survey of the development footprint and a 30m radius around the development footprint, should be undertaken immediately prior to any construction works commencing to ensure no new setts have become established.
Dormice	The Site was identified as providing some very limited suitable foraging, commuting, nest building and hibernating opportunities for dormice.	None required providing the avoidance and mitigation measures are adhered to.	A sensitive lighting mitigation strategy should be adhered to throughout all phases of the proposed development.
GCN	The Site was identified as having potential to support GCN during their terrestrial lifecycle phase. There was also suitable habitat connectivity to a network of waterbodies within a 500m radius of the Site.	A GCN Habitat Suitability Index (HSI) assessment of all potentially suitable waterbodies within a 500m radius of the Site should be undertaken. Depending on the HSI findings, further GCN presence/likely	Further requirements for mitigation, compensation and/or licences may be required for GCN depending on the results of the recommended further surveys.



		absence surveys may be required.	
Reptiles	The Site was identified as having low potential to support reptiles providing foraging, commuting and basking opportunities.	None required providing the avoidance mitigation measures are adhered to.	It is recommended that clearance of suitable reptile habitat be undertaken using a sensitive vegetation clearance approach during April to September inclusive (generally in dry, warm weather and greater than 9°C air temperature). It should be noted that the above recommendations are subject to change, depending on the findings of the further recommended GCN surveys.
Nesting Birds	The Site was identified as having potential to support nesting birds.	None required.	Works should be undertaken outside the main nesting bird season. Should this not be possible, all trees and buildings must be inspected by an ecologist to determine the presence/absence of any nesting birds immediately prior to clearance.
Invasive Plants	Stands of montbretia and cherry laurel were recorded within the Site.	None required.	If required, the cherry laurel and montbretia should be removed sensitively and securely to prevent its spread into adjacent habitats and neighbouring land.



2 INTRODUCTION

2.1 Instruction

- 2.1.1 PJC Consultancy Ltd was commissioned by Mr David Shankland to provide a preliminary ecological appraisal (PEA) which includes an ecological walkover survey and a daytime bat walkover (DBW) survey in support of the proposed development at Birchgrove Farmhouse Barns, Horstead Keynes, Sussex, RH17 7BT (hereafter referred to as the 'Site').

2.2 Survey Objectives

- 2.2.1 The aim of this PEA is to identify potential ecological constraints and opportunities associated with the Site by undertaking both an ecological walkover survey, ecological desk study and DBW survey. The objectives were to:

- Identify the broad habitat types present on the Site;
- Identify the potential of the Site to support protected and notable habitats and/or species;
- Identify the potential of any trees and buildings within the Site to support roosting bats;
- Highlight known or potential legal or planning policy constraints in relation to ecology and recommend avoidance, mitigation and enhancement measures to satisfy legal and planning policy requirements where appropriate; and
- Identify, where necessary, the requirement for further survey.

2.3 Documents and Information Provided

- 2.3.1 Development proposal are anticipated to include the conversion of buildings B1 and B2 into residential properties, with associated access, parking and amenity space.
- 2.3.2 PJC Consultancy used the 800-01A Site Location and Block Plan (David Jenkins Design) to aid in the preparation of this report.

2.4 Scope of Report

- 2.4.1 This PEA is only concerned with the habitats and features within the property boundaries of the Site, or in areas that have the potential to be affected by the proposed new development.

2.5 Site Description

- 2.5.1 The Site, approximately 0.2ha in size, is located east of Birch Grove within a small collection of residential properties, approximately 1.4km west of the village of Chelwood, centred on OS Grid Reference TQ 39962 30044. Located within a rural environment, the Site is surrounded by large, green open spaces and woodland parcels interspersed with residential properties. The location of the Site within its environs is presented in Appendix I.

2.6 Legislation and Planning Policy

- 2.6.1 This PEA has been compiled with reference to relevant wildlife and countryside legislation, planning policy and the UK Biodiversity Framework. Their context and applicability is explained as appropriate in the relevant sections of the report and additional details are presented in Appendix II.
- 2.6.2 The key articles of relevance are:
- The Conservation of Habitats and Species Regulations 2017;
 - The Environment Act 2021;
 - The Wildlife and Countryside Act 1981, as amended (WCA);
 - The Countryside and Rights of Way (CROW) Act 2000;



- The Natural Environment and Rural Communities (NERC) Act 2006;
- National Planning Policy Framework (NPPF) 2024 (Ministry of Housing, Communities and Local Government, 2024);
- The Protection of Badgers Act 1992;
- The UK Post-2010 Biodiversity Framework (2011-2020); and
- Mid Sussex District Plan 2014-2031 (Mid Sussex District Council, 2018).



3 METHODOLOGY

3.1 Desk Study

- 3.1.1 A desk study was undertaken in October 2025 with the objective of collating and reviewing existing ecological information, and obtaining data and information held by relevant third parties.
- 3.1.2 In addition, datasets from Natural England (MAGIC, 2025) were reviewed to identify the presence of UK statutory designated sites and notable habitats within the zone of influence, including woodlands listed on the ancient woodland inventory, habitats of principal importance (HPI) listed on the priority habitat inventory and statutory designated for their nature conservation value at the national scale such as sites of scientific interest (SSSI) and at the European and/or international scale namely: special areas of conservation (SACs), special protection areas (SPAs), and internationally designated wetland (Ramsar) sites. These sites collectively are hereafter referred to as 'European Sites'.
- 3.1.3 Data for sites within the zone of influence where European Protected Species Mitigation (EPSM) licences have been granted, were also reviewed. This information allows a greater understanding of the potential for European protected species to be present in the local area.
- 3.1.4 Where measurements are included with the record, these provide the distance of the record from the closest point of the Site.
- 3.1.5 The zone of influence is the area over which ecological features, such as designated sites of nature conservation importance and protected and notable habitats and species, may be affected by the biophysical changes caused by the proposed development and associated activities. Due to the size of the Site and nature of the proposed development, it is considered that a zone of 1km from the centre of the Site is appropriate for the gathering of information for the desk study (CIEEM, 2018).

3.2 Ecological Walkover Survey

- 3.2.1 An ecological walkover survey (formerly referred to as 'extended phase 1 habitat survey') was undertaken on the 9th September 2025 by Nicolle Stevens BSc(Hons) ACIEEM (Natural England class two bat and class one great crested newt *Triturus cristatus* (GCN) licence holder). As part of the ecological walkover survey, habitats were identified and mapped in accordance with 'UK Habitat Classification 2.0' (UKHab Ltd, 2023) (Appendix III).
- 3.2.2 UK Habitat Classification 2.0 comprises a five-level 'Primary Habitat Hierarchy' and a list of 'Secondary Codes', the latter is sub-divided into Essential and Additional Codes. For the purpose of this assessment, habitats have been allocated a single Primary Habitat Code up to Level 4 as well as all associated Essential Secondary Codes, and where relevant Additional Secondary Codes.
- 3.2.3 The ecological walkover survey was extended to include consideration of protected and notable species in accordance with good practice guidance for preliminary ecological appraisal (CIEEM, 2017). The dominant plant species in each habitat were recorded, as were any evidence of protected and notable species. The potential for the Site to support protected and notable species was also assessed. Those ecological features not classified as a habitat are denoted using a target note.

3.3 Daytime Bat Walkover Survey

- 3.3.1 All buildings and trees within the Site were also subject to a DBW survey. The external and internal inspection of the buildings and ground inspection of trees was to assess potential roosting features (PRFs) such as those presented in Tables 1 and 2. The DBW survey was undertaken in accordance with best practice survey standards (Collins, 2023 and BTHK, 2018).

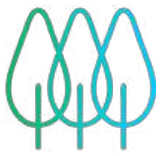


Table 1: Features of trees commonly used by bats.

Features of trees used as bat roosts	Signs indicating possible use by bats
Natural holes.	Tiny scratches around entry point.
Woodpecker holes.	Staining around entry point.
Cracks/splits in major limbs.	Bat droppings in, around or below entrance.
Loose bark.	Audible squeaking at dusk or in warm weather.
Hollows/cavities.	Flies around entry point.
Dense epicormic growth (bats may roost within it).	Distinctive smell of bats.
Bird and bat boxes.	Smoothing of surfaces around cavity.

Table 2: Features of buildings commonly used by bats.

Features of building or built structure	Signs indicating possible use by bats
Type of building.	Tiny scratches around entry point.
Age of building.	Staining around entry point.
Aspect of PRF.	Bat droppings in, around or below entry point.
Wall construction – cavity walls or rubble-filled walls.	Feeding remains below entry point.
Form of the roof – presence of gable ends, hipped roofs, nature and condition of the roof covering.	Cobweb free potential entry points.
Presence of hanging tiles, weather boarding or other forms of cladding.	Audible squeaking at dusk or in warm weather.
Nature of the eaves – sealed by a soffit or boxed eave and tightness of fit to exterior walls.	Flies around entry point.
Presence and condition of lead flashing.	Distinctive smell of bats.
Gaps under eaves, around windows, under tiles, lead flashing.	Smoothing of surfaces around entry point.
Presence and type of roof lining.	
Presence on roof insulation.	

- 3.3.2 The buildings and trees were assessed in accordance with the criteria listed above and assigned to one of five categories as listed in Table 3 and Table 4 below.

Table 3: Categorisation system for visual inspection of trees.

Category	Description
None	A tree with no features capable of supporting roosting bats or highly unlikely to be any present.
FAR	Further assessment required to establish if any PRFs are present in the tree.
PRF	A tree with at least one PRF present.
PRF-I	Features considered suitable to support individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	Features considered suitable to support multiple bats and may therefore be used by a maternity colony.

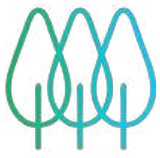


Table 4: Categorisation system for visual inspection of structures.

Category	Description
Confirmed roost	Bats discovered roosting within structure or recorded emerging from/entering structure at dusk and/or dawn. Structure found to contain conclusive evidence of occupation by bats, such as bat droppings. A confirmed record (as supplied by an established source such as the local bat group) would also apply to this category.
High suitability	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Moderate suitability	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
Low suitability	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats.
Negligible suitability	A structure with no features capable of supporting roosting bats.

3.4 Bat DNA Analysis

- 3.4.1 During the DBW survey, bat droppings were recorded within the upper levels of building B1. These droppings were collected by Nicolle Stevens BSc(Hons) ACIEEM (Natural England class two bat licence holder) on 9th September 2025 and sent for laboratory analysis (SureScreen Life Sciences). The DNA from each dropping sample was extracted and a short fragment of the bat mitochondrial gene amplified using Polymerase Chain Reaction (PCR) (if a sample is very degraded, a restorative enzyme treatment is used instead). The amplified gene was then sequenced to give the full genetic sequence and matched against a database of known species to identify the origin of the species of the bat dropping.

3.5 Barn Owl Assessment

- 3.5.1 All identified buildings within the Site were also subject to a barn owl assessment by Nicolle Stevens BSc(Hons) ACIEEM on 9th September 2025. The external and internal inspection was to identify evidence of barn owl presence and/or activity, including live sightings, droppings, pellets, feathers and nests. Any suitable nesting ledges and access points (holes > 75mm) were also surveyed during the assessment. The nesting barn owl assessment was undertaken in accordance with best practice survey standards (Barn Owl Trust, 2012).

3.6 Great Crested Newt Habitat Suitability Index Assessment

- 3.6.1 Three waterbodies (waterbodies WB1-WB3) were identified within the Site during the ecological walkover survey. The location of these waterbodies can be seen in Appendix III.
- 3.6.2 Waterbody WB1 and WB3 were subject to a habitat suitability index (HSI) assessment and terrestrial habitat assessment during the ecological walkover survey by Nicolle Stevens BSc(Hons) ACIEEM (Natural England class one GCN licence holder) on 9th September 2025.
- 3.6.3 A HSI is a tool that enables an assessment of the likelihood of a water body to support GCN. It incorporates 10 suitability indices (SI), all of which are factors thought to affect GCN, as detailed in Table 5 below.



Table 5: HSI Suitability Indices.

Suitability Indices	Description
Sl ₁	Geographic location
Sl ₂	Pond area
Sl ₃	Permanence
Sl ₄	Water quality
Sl ₅	Shade
Sl ₆	Waterfowl
Sl ₇	Fish
Sl ₈	Pond count
Sl ₉	Terrestrial habitat
Sl ₁₀	Macrophytes

- 3.6.4 Each variable is assessed separately and then mathematically combined in the following formula, $HSI = (Sl_1 * Sl_2 * Sl_3 * Sl_4 * Sl_5 * Sl_6 * Sl_7 * Sl_8 * Sl_9 * Sl_{10})^{1/10}$ to provide the geometric mean, which is a numerical index between 0 and 1. A lower score indicates a less suitable habitat whereas a higher score represents optimal conditions favourable for GCN as detailed in Table 6 below. There is a positive correlation between the scores and the resulting incidence of GCN observed in ponds. However, whilst the HSI can be used to help inform the likelihood of presence or absence it is not sufficiently precise to allow conclusion that a higher score confirms presence and likewise a lower score absence. HSI is therefore used as a guide to help determine the need for further GCN surveys.

Table 6: Categorisation of HSI Scores.

HSI	Pond Suitability
<0.5	Poor
0.5-0.59	Below Average
0.6-0.69	Average
0.7-0.79	Good
>0.8	Excellent

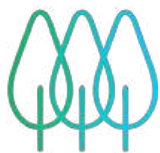
3.7 Limitations of Survey

- 3.7.1 The protected species assessment provides a preliminary view of the likelihood of protected species occurring on Site, based on the suitability of the habitat and any direct evidence on Site. It should not be taken as providing a full and definitive survey of any protected species group. Additional surveys may be recommended if, on the basis of this assessment it is considered reasonably likely that protected species may be present.
- 3.7.2 The habitats present, and their management are likely to change over time, thus the findings of the ecological walkover survey are only considered valid for a period of up to two years.
- 3.7.3 This report includes a preliminary assessment of likely impacts of a development project only. The primary audience for a PEA is the client or developer and relevant members of the project team, such as the architect, planning consultant, and landscape architect. It is normally produced to inform a



developer (or other client), and their design team, about the key ecological constraints and opportunities associated with a project, possible mitigation requirements and any detailed further surveys required. Under normal circumstances, it is not considered appropriate to submit a PEA in support of a planning application because the scope of a PEA is unlikely to fully meet planning authority requirements in respect of biodiversity policy and implications for protected species. In most cases, particularly when further surveys have been recommended within the PEA, a more detailed and comprehensive Ecological Impact Assessment (EcIA) should be submitted in support of a planning application instead.

- 3.7.4 This document has been prepared for the stated proposal (2.3.1) and should not be relied upon or used for any other project without an additional check being carried out by the author as to its suitability in relation to any updated proposals. PJC Consultancy accepts no responsibility or liability for the consequence of this document being used for a purpose other than the purposes for which it was commissioned. PJC Consultancy accepts no responsibility or liability for this document to any party other than the person by whom it was commissioned.



4 RESULTS

4.1 Desk Study

Statutory Designated Sites

- 4.1.1 Three statutory designated sites of nature conservation importance were identified within the zone of influence as part of the desk study. These include Ashdown Forest SSSI, SAC and SPA, situated approximately 360m east of the Site.
- 4.1.2 Ashdown Forest SSSI is primarily designated for the largest single continuous blocks of heath, semi-natural woodland and valley bog, in south-east England. In addition, it supports several uncommon plants, a rich invertebrate fauna, and important populations of heath and woodland birds.
- 4.1.3 Ashdown Forest SAC is primarily designated for supporting one of the largest single continuous blocks of lowland heath in south-east England, with both European dry heaths, and, in a larger proportion, North Atlantic wet heath. Ashdown Forest was also designated as a SAC for its presence of GCN.
- 4.1.4 Ashdown Forest SPA is primarily designated for supporting bird populations of European importance which are listed on Annex I of the Directive. Bird species include Dartford warbler *Sylvia undata* and nightjar *Caprimulgus europaeus*.

Protected and Notable Habitats

- 4.1.5 In total, 31 parcels of ancient woodland listed on the ancient woodland inventory were identified within the zone of influence as part of the desk study, the nearest being approximately 62m north-east of the Site.
- 4.1.6 Overall, 43 parcels of HPI listed on the priority habitat inventory were identified within the zone of influence as part of the desk study. These habitats included broadly classified deciduous woodland (38 parcels) and woodpasture and parkland (five parcels).
- 4.1.7 The closest parcel of HPI was an area of broadly classified deciduous woodland located approximately 62m north-east of the Site.

Protected and Notable Species

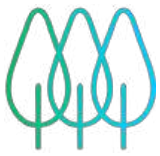
- 4.1.8 No EPSM licences granted in relation to protected species were identified within the zone of influence as part of the desk study.

4.2 Ecological Walkover Survey

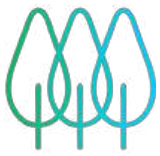
- 4.2.1 Habitat types and descriptions and associated primary and secondary codes are provided in Table 7 below in accordance with UK Habitat Classification 2.0. The distribution of these habitats are presented in Appendix III, together with Site photographs, which are presented in Appendix IV.

Table 7: Habitat types present within the Site.

Habitat Type				Description
Level 2	Level 3	Level 4	Secondary Codes	
Urban (u)	Built-up areas and gardens (u1)	Developed land; sealed surface (u1b)	Scattered trees (32)	The Site comprised a number of residential properties with associated outbuildings. A full description of the buildings is presented in Table 8 below. A paved pathway was recorded throughout the Site, which extended to include a patioed area surrounding waterbody WB2. A relatively large proportion (approximately 40%) of the garden comprised mature stands of non-native
			Frequently mown (108)	
			Vegetated garden (828)	



				Ruderal/ephemeral (81) ornamental species planted in designated/formal beds. These parcels primarily included rose <i>Rosa</i> spp., cherry laurel <i>Prunus laurocerasus</i>, lilac <i>Syringa</i> sp., garden phlox <i>Phlox paniculata</i>, bottle brush <i>Callistemon rigidus</i>, maidens blush fuchsia <i>Fuchsia magellanica</i> 'Alba', strawberry <i>Fragaria vesca</i>, currents, <i>Euphorbia</i> sp., <i>Hydrangea</i> spp., <i>Hebe speciosa</i>, <i>Camellia</i> sp., st john's wort <i>Hypericum perforatum</i>, oregan grape <i>Mahonia aquifolium</i>, fleabane <i>Erigeron</i> sp., staghorn sumac <i>Rhus typhina</i>, montbretia <i>Crocsmia x crocosmiiflora</i>. Large areas of the Site, particularly within the east, comprised a formal garden lawn comprising up to 5sp./m². The grassland, for the most part, exhibited a short and uniform sward (< 5cm) due to a regular mowing regime. Species recorded included primarily grasses such as perennial rye-grass <i>Lolium perenne</i> and red fescue <i>Festuca rubra</i> as well as dandelion <i>Taraxacum officinale</i>, daisy <i>Bellis perennis</i>, white clover <i>Trifoulim repens</i>, silverweed <i>Potentilla anserina</i>, ferns <i>Tracheophyta</i> spp., ground ivy <i>Glechoma hederacea</i>, annual meadow grass <i>Poa annua</i> and creeping buttercup <i>Ranunculus repens</i>. Cocksfoot <i>Dactylis glomerata</i>, herb Robert <i>Geranium robertianum</i>, false oat grass <i>Arrhenatherum elatius</i> and yarrow <i>Achillea millefolium</i> were also recorded along the boundary peripheries. A parcel of ephemeral/ruderal vegetation was also recorded along the western extent of buildings B1 and B2, likely where a vegetable plot was once established. Here, species of common nettle <i>Urtica dioica</i>, rough hawkbit <i>Leontodon hispidus</i>, wood sorrel <i>Oxalis acetosella</i>, broadleaf plantain <i>Plantago major</i>, creeping buttercup, groundsel <i>Senecio vulgaris</i>, teasel <i>Dipsacus fullonum</i> and sow thistle <i>Sonchus oleraceus</i> were recorded, along with sweet William <i>Dianthus barbatus</i>, rhubarb <i>Rheum rhabarbarum</i>, beets <i>Beta</i> spp. and wallflower <i>Erysimum cheiri</i>. Multiple scattered trees were recorded within the Site, primarily within the garden to the east of the Site. Tree species recorded included ash <i>Fraxinus excelsior</i>, pear <i>Pyrus</i> sp., purple hazel <i>Corylus maxima purpurea</i>, bay laurel <i>Laurus nobilis</i>, Portuguese laurel, willow <i>Salix</i> sp. and silver birch <i>Betula pendula</i>. A number of mature apple <i>Malus</i> spp. and crab apple <i>Malus sylvestris</i>, trees were also recorded within the south-western corner of the Site.
Heathland and shrub (h)	Hedgerows (h2)	Other native hedgerow (h2a6)	Active management (516)	A hedgerow comprising primarily native woody species (approximately 80%) was recorded within the southern extent of the Site. Woody species recorded included primarily box honeysuckle <i>Lonicera nitida</i>, with wild privet <i>Ligustrum vulgare</i>. The hedge appeared dense and was approximately 1.5m in height and 0.5m wide, indicative of a regular management regime.



Rivers and lakes (r)	Other standing water (r1g)	N/A	Ornamental lakes or ponds (46)	Two artificial garden ponds were recorded within the Site. Ponds supported concrete sides and were covered with common duckweed <i>Lemna minor</i> . A swimming pool was also recorded on Site.
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4.3 Daytime Bat Walkover Survey

- 4.3.1 A description of the buildings and trees and any potential roosting features (PRF) are detailed in Tables 8 and 9 below:

Table 8: DBW results of buildings within the Site.

B1

External Description

A barn comprised of stone-and-mortar in reasonable condition; some of the stonework was damaged and missing in places, creating gaps into the walls/internal elements. The barn supported a pitched roof comprised of clay roof tiles in poor condition. Many of the tiles were missing, and many more lifted or damaged. Clay ridges tiles ran north-east to south-west, which appeared to have been replaced, with new mortar present. The eaves of the barn were open, exposing rafter tails here. On the gable ends (north-eastern and south-western elevations), the barn supported a timber barge board that was also not flush to the wall. On all but the south-western elevation, the building supported timber barn doors and windows with frames where the frames were not flush to the walls.

Internal Description

Internally the building was split over two floors which were open to each other. On the lower floor, a separate room supporting a suspended ceiling and used as a contained office, was recorded at the southern elevation. The remainder of the barn was open. On the upper floor, the barn was approximately 4m floor to apex, 5m wide and 11m in length, and was supported by timber trusses and rafters in varying condition; some had been reinforced in places. Open mortise and tenon joints were recorded in the trusses and rafters and gaps were recorded around the trusses where they were not flush to the walls. The eaves were recorded open in places and sealed with wood in others. The roof was unlined and uninsulated, and the underside of the tiles were exposed. Cracks and missing stonework were recorded on the gable ends, leading to cavities in places. Light ingress was recorded throughout from the open eaves, windows and from the gaps between the walls and window and door frames.

Evidence of Bats

Bat droppings were recorded scattered throughout the internal elements of the barn.

Potential Roost Features

The lifted, missing and damaged roof tiles, gaps within the stonework and between the window and door frames and the walls could provide potential roosting features for bats. These features, along with open eaves, could also provide internal access for bats to roost within the mortise and tenon joints and along the apex of the barn, at the rafters.

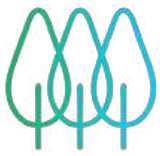
Suitability to Support Roosting Bats

Confirmed.

B2

External Description

A single storey building supported on brick-and-mortar foundations supported by a timber frame which was clad with painted timber weatherboarding. The weatherboarding was lifted in places on all elevations, apart from the northern gable end which was attached to building B1 with lead flashing which appeared to be sealed. Some weatherboarding was also missing on the western elevation. Here, plastic sheeting could be seen. The



building supported a pitched roof of clay tiles with many lifted, missing or damaged. The eaves of the building appeared to be sealed with wooden planks in places and was open in others.

Internal Description

The building was open with a floor to apex height of approximately 6m, 12m in length and 5m wide. The roof was supported by timber trusses in good condition and lined with plasterboard that had been plastered and painted. The north-eastern wall comprised stone-and-mortar which was painted but the plasterboard was not sealed to this, creating small gaps behind the plasterboard.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

The lifted, missing and damaged roof tiles, lifted and missing weatherboarding and open eaves could provide potential roosting features for bats and access to a space for bats to roost between the tiles and plasterboard and behind the weatherboarding.

Suitability to Support Roosting Bats

Moderate.

B3

External Description

A pig shed comprised of brick-and-mortar which appeared to be in good condition. The building was open on the southern elevation and supported a pitched corrugated metal sheets which were lined in places on the underside with felt.

Internal Description

The building was approximately 1.5m floor to apex, 2m wide and 4m in length. The roof was lined with timber sarking in varying condition and supported by timber trusses and batons in poor condition. Some light ingress was recorded at the eaves. On the eastern gable end, the building was attached to building B4. Here, the timber weatherboarding of building B4 could be seen.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

Gaps between the corrugated metal sheets and felt lining and any space between the roofing materials and sarking could provide potential roosting opportunities for bats.

Suitability to Support Roosting Bats

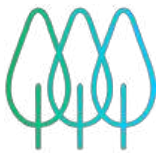
Low.

B4

External Description

An 'L' shaped building comprised of a timber frame on brick-and-mortar foundations. The building was clad with single skinned, painted/treated timber weatherboarding that was lifted or missing in places providing internal access into the building. The building supported a pitched roof comprised of a combination of corrugated tin and coated metal which appeared to be in reasonable condition. The ridge lines of the building ran in an north-west to south-east and north-east to south-west direction and were comprised of tin which was not flush to the roofing materials given the corrugated nature.

Internal Description



The north-western extent of the building supported horse tables, approximately 3m floor to apex, 7m in length and 5m wide. This extent of the building was divided into two compartments by a plywood wall that did not meet the roof. The building was supported by timber trusses which appeared to be in good condition. The walls of the western compartment were lined with plywood and a composite material lined the roof, the latter of which was in poor condition. The walls of the eastern compartment were unlined for the majority with some plywood in places. The roof was also unlined, exposing the underside of the roofing materials. The south-eastern gable end of the building was lined with timer weatherboarding which formed part of the adjacent part of the building, and was damaged in places, providing gaps throughout the internals of the building.

The eastern extent of the building was approximately 10m floor to apex, 13m in length and 5m wide. This extent of the building was divided into two (northern and southern compartments) by a wall constructed of a timber frame clad with timber, single skin weatherboarding which appeared to be in good condition. The roof of both compartments was unlined, and light ingress was recorded along the apex and eaves. The building was supported by timber trusses in varying condition.

The southern elevation of the southern compartment and the north-eastern elevation of the northern compartment were open fronted.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

Gaps between the timber frame and roofing materials could provide potential roosting features for bats.

Suitability to Support Roosting Bats

Low.

B5

Description

A single storey shed comprised of a timber frame and clad with timber weatherboarding. The building supported a monopitched roof of felt and supported an open fronted log store on the south-eastern elevation. The building was in overall good condition.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

None recorded at the time of the assessment.

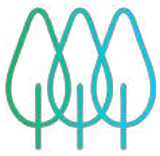
Suitability to Support Roosting Bats

Negligible.

B6

External Description

A multi-storey residential property comprised of stone-and-mortar which has been pebbledash rendered and painted on all but the north-eastern elevation which comprised exposed stonework. The building supported a multi-pitched roof of clay roof tiles, many of which were lifted. Skylights were recorded on the south-western elevation, indicating that the roof void/space here had been converted. Multiple brick-and-mortar chimney stacks were recorded across the building and sealed to the roof with lead flashing that appeared to be sealed. Two single storey square bay windows comprised of the same materials were recorded on the western elevation of the building, supporting pyramidal roofs of clay tiles. The eaves of the building appeared to be sealed, although no fascia or barge board was recorded.



A single storey conservatory comprised of uPVC and glass was recorded on the north-western gable end.

The building also supported multiple extensions which had been added over the years.

The extensions of the building comprised brick and mortar, which were painted for the majority. The single storey extension on the eastern elevation of the building supported a 'T' shaped pitched roof of clay tiles which were lifted and missing in places. The top half of the gable ends of the extension were clad with timber weatherboarding that was lifted in places. Two single storey extensions were also recorded on the northern elevation. One was comprised of stone-and-mortar and supported a pitched, clay tiled roof. The second extension comprised a timber frame on brick-and-mortar foundations that was clad with painted timber weatherboarding that was lifted/warped in places. The eaves of this extension were open.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

The lifted roof tiles and weatherboarding could provide potential opportunities for roosting bats.

Suitability to Support Roosting Bats

Moderate.

Table 9: DBW survey results of trees within or immediately adjacent the Site.

T1

Description

A semi-mature ash approximately 3m in height.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

Dense ivy cladding up the main stem could provide potential roosting features for bats.

Suitability to Support Roosting Bats

PRF-I

All other trees

Description

All other trees within the Site were considered structurally sound with no obvious defects recorded.

Evidence of Bats

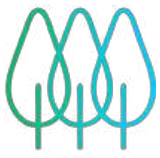
None recorded at the time of the assessment.

Potential Roost Features

None recorded at the time of the assessment.

Suitability to Support Roosting Bats

None.



4.4 Bat DNA Analysis

- 4.4.1 The results of the bat DNA analysis were received on the 10th September 2025. The sample taken from within the upper levels of building B1, confirmed the droppings were from brown long-eared *Plecotus auristus* bats (see Appendix V for laboratory results).

4.5 Barn Owl Assessment

- 4.5.1 No barn owls or evidence of barn owl occupation within the buildings and trees were identified during the barn owl assessment.

4.6 GCN HSI Assessment

- 4.6.1 A summary of the HSI results is presented in Table 10 below.

Table 10: Summary of HSI Results.

Suitability Indices	HSI Score	
	WB1	WB3
Location	1	1
Pond Area	0.05	0.05
Pond Drying	0.9	0.9
Water Quality	0.33	33
Shade	0.3	0.2
Fowl	1	1
Fish	0.67	0.67
Ponds	1	1
Terrestrial Habitat	1	1
Macrophytes	0.01	0.01
Overall Score	0.35 'Poor'	0.34 'Poor'



5 DISCUSSION AND RECOMMENDATIONS

5.1 Statutory Designated Sites

- 5.1.1 Three statutory designated sites of nature conservation importance were identified within the zone of influence as part of the desk study. These include Ashdown Forest SSSI, SAC and SPA, situated approximately 360m east of the Site.
- 5.1.2 Given the distance between the Site and the identified statutory designated sites, and the size of the Site and nature of the proposed development, adverse effects upon the statutory designated sites and their qualifying criteria for designation are not considered likely.
- 5.1.3 However, the Site is located within an impact risk zone for Ashdown Forest SAC and SPA and while it does not fall into the list of development categories, the proposal would create a net increase in residential units, which is considered to likely have a significant effect on the qualifying features of the SAC and SPA through increased recreational pressure.
- 5.1.4 The LPA therefore has a duty to consult Natural England for advice on the development and how potential impacts on the SAC and SPA might be avoided or mitigated against.
- 5.1.5 As the government's conservation advisory body, Natural England has statutory duties and responsibilities in relation to European designated sites, which include providing advice to developers and local planning authorities (LPAs) on the proposed developments potential impacts on SSSIs (and other European designated sites). Natural England has to ensure that European designated sites are protected and enhanced in line with the policies of the NPPF and local development plans.
- 5.1.6 Therefore, Natural England have developed impact risk zones which define zones around each European designated site, reflecting sensitive features for the sites designation and enabling a rapid initial assessment of the potential risks or adverse impacts that the development may have on the European designated sites.
- 5.1.7 LPAs can utilise impact risk zones to consider whether the proposed development is likely to have an impact on SSSIs (and European designated sites). Furthermore, if the development does not form a householder application, the both the developer and LPA should consult with Natural England, to determine whether they will need to seek advice on the likelihood of potential impacts and how they might be avoided or mitigated against.
- 5.1.8 Despite the above, given the distance between the Site and the identified statutory designated site, and the small-scale nature of the proposed development, adverse effects upon Ashdown Forest SAC and SPA, including from increased recreational pressure, are considered highly unlikely.

5.2 Protected and Notable Habitats

Woodland

- 5.2.1 In total, 31 parcels of ancient woodland listed on the ancient woodland inventory were identified within the zone of influence as part of the desk study, the nearest being approximately 62m north-east of the Site.
- 5.2.2 Overall, 43 parcels of HPI listed on the priority habitat inventory were identified within the zone of influence as part of the desk study. The closest parcel of HPI was an area of broadly classified deciduous woodland located approximately 62m north-east of the Site, also designated as ancient woodland.
- 5.2.3 Given the distance between the Site and the nearest parcel of ancient woodland and HPI and given the size of the Site and nature of the proposed development, adverse effects upon these protected and notable habitats are not considered likely. Protected and notable habitats are therefore not considered an ecological constraint and are not considered further in this report.



Hedgerows

- 5.2.4 The hedgerow was recorded within the Site consist predominantly (i.e. 80% or more cover) of at least one woody UK native species. However, given the hedgerow is less than 20m in length, the hedgerow therefore is not considered to qualify as an HPI under the NERC Act 2006 (JNCC, 2008).
- 5.2.5 The proposed development seeks to retain the hedgerow as it currently is in its current form. Therefore, impacts to the hedgerow are not considered likely, providing the mitigation measures detailed below are adhered to.
- 5.2.6 It is also recommended that a strict pollution prevention protocol, as detailed below, be implemented throughout the demolition, construction, and operational phases of the proposed development, to ensure that dust and particulate pollution of all retained hedgerows and wider surroundings is avoided.
- 5.2.7 Avoidance and mitigation measures should ensure that demolition and construction works use water, to damp down material and prevent dust clouds, and on-tool extraction where possible. However, works must take place during periods of low rain fall and predicted dry weather to ensure pollution run off from the Site to the surrounding areas is avoided.
- 5.2.8 Providing general construction environmental best practice measures are implemented, adverse effects upon the parcel of hedgerow HPI are not considered likely.

5.3 Protected and Notable Species

- 5.3.1 The Site was considered to provide opportunities for protected and notable species. The suitability of habitat on Site to support species is considered below.

Bats

- 5.3.2 All bats are European protected species (EPS) and both individual animals and their roosts are afforded protection under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act, 1981 (as amended). Certain bat species are also listed as Species of Principal Importance (SPI) under the NERC Act 2006.

Roosting Suitability

- 5.3.3 As part of the DBW survey, buildings B3 and B4 were identified as having low suitability to support roosting bats, building B6 as having moderate suitability, and building B5 was identified as having negligible suitability to support roosting bats.
- 5.3.4 No works are proposed to buildings B3-B5 as a result of the proposed development and on this basis, adverse impacts to roosting bats are not anticipated, providing the avoidance and mitigation measures detailed in paragraph 5.3.24 are adhered to. Further surveys of buildings B3-B5 are therefore not considered necessary.
- 5.3.5 As part of the DBW survey, building B1 was confirmed as a brown long-eared bat roost and building B2 was found was identified as exhibiting features i.e lifted, damaged or missing tiles with potential to support roosting bats. On this basis, building B1 was confirmed as a bat roost and building B2 was identified as having moderate suitability to support roosting bats during the summer.
- 5.3.6 Therefore, further emergence/re-entry surveys are required to determine presence or likely absence of bat roosts within buildings B1 and B2 to determine any subsequent requirements for mitigation, compensation and/or licences to facilitate the proposed development. All bat emergence/re-entry surveys should be undertaken between May and September inclusive. A minimum of a three-week interim period must be allowed between each survey visit.
- 5.3.7 Building B1 was identified as confirmed as a bat roost. It is therefore recommended that three dusk emergence surveys be undertaken on this building.



- 5.3.8 Building B2 was identified as having moderate suitability to support roosting bats. It is therefore recommended that two dusk emergence surveys be undertaken. It should be noted that should a bat roost or roosts be found, additional surveys totalling three emergence or re-entry surveys will be required to be undertaken, to determine any subsequent requirements for mitigation, compensation and/or licences to facilitate the proposed development
- 5.3.9 In addition to summer roosting suitability, both buildings B1 and B2 were also identified as having suitability to support hibernating roosting bats.
- 5.3.10 Building B1 was classified as having moderate suitability to support roosting bats during hibernation. During hibernation, bats require roosts that are quiet, cool and damp with high humidity that remain at a stable temperature throughout the winter period. During the DBW survey, building B1 was observed as damp, cool and dark. The building supported ingress and egress opportunities such as a cracks and gaps in the stonework and within mortise and tenon joints. However, given the building was considered a non-classic hibernation site (Collins, 2023), building B1 was identified as having moderate suitability to support hibernating roosting bats.
- 5.3.11 Given that building B1 is proposed to be converted, the proposed development could result in the damage or destruction of a potential bat hibernation site.
- 5.3.12 It is therefore recommended that two hibernation checks be undertaken during the coldest months of the year, (generally one undertaken in mid-January, and one undertaken in mid-February) to search for hibernating bats or evidence of hibernating bats. A minimum of a four-week interim period must be allowed between each survey visit.
- 5.3.13 It is also recommended that one automated static detector be installed in building B1 for a minimum of two weeks each month during November-March inclusive, to determine the presence or likely absence of bats hibernating within building B1.
- 5.3.14 Given that building B2 did not support a roof space, the suitable hibernation features of building B2 are considered limited to the lifted roof tiles and weatherboarding only. On this basis, the building is considered highly unlikely to provide a cool and stable temperature required for hibernation during the winter months, however, the building could support a low number of hibernating individual bats. therefore, building B2 was classified as having low suitability to support hibernating bats.
- 5.3.15 However, it is not considered appropriate nor efficient to undertake a systematic hibernation assessment of building B2. Given the inefficiencies of a systematic search of the entire building, much of which is inaccessible due to health and safety grounds (for example brown long-eared bats have been known to hibernate below ridge tiles and similar features, which would not be picked up during a hibernation assessment), hibernation surveys of building B2 are not considered practical on this occasion.
- 5.3.16 Therefore, it is recommended that any works to building B2 be undertaken outside of the core hibernation period (outside of November to March inclusive). It is also recommended that suitable hibernation features, such as lifted tiles, be reinstated into the building to maintain hibernation features.
- 5.3.17 As part of the DBW survey, tree T1 was identified as exhibiting features with potential to support roosting bats and was identified as having PRF-I suitability to support roosting bats. All other trees were identified as having none suitability to support roosting bats and there are considered likely absent from all other trees on Site.
- 5.3.18 It should be noted that the DBW survey was undertaken from the ground and therefore it was not possible to accurately determine the characteristics of the feature, for example the depth of the feature within the tree. The above classification therefore follows a precautionary approach using professional judgement.
- 5.3.19 Tree T1 was identified as having PRF-I suitability to support roosting bats. No further surveys are considered necessary on this tree. However, as a precaution it is recommended that an inspection of



tree T1 be undertaken immediately prior to felling (if required) to determine whether bats are roosting within the tree, which can be undertaken by the tree surgery contractor under the instruction and supervision of a suitably licenced ecologist.

- 5.3.20 Other precautionary mitigation measures to be implemented may include soft-felling sections of the tree that contain potential roost features. This involves gradually sectioning the trunk and/or limbs and lowering sections to the ground by hand or by using ropes. As a further precaution, the felling/pruning of the tree should be undertaken outside the core hibernation period (between November and February).
- 5.3.21 The findings of the bat emergence/re-entry surveys and hibernation surveys and any subsequent requirements for mitigation and compensation and/or licenses to facilitate the proposed development should be presented within a stand-alone (phase 2) report or ECIA.
- 5.3.22 It should be noted that should a bat roost or roosts be found, a EPSM licence may be required to permit works that would potentially cause destruction or modification. A EPSM licence for development is issued by Natural England under Regulation 53(2)(e) of The Conservation of Habitats and Species Regulations (2017). This application process can a minimum of six weeks.

Foraging and Commuting Suitability

- 5.3.23 The Site was considered to provide suitable commuting and foraging habitat for bats primarily the vegetated garden and was classified as having low suitability to support foraging and commuting bats.
- 5.3.24 However, these features are to be retained for the majority and are not considered to function as an important corridor for bats given the large network of connected woodland immediately north of the Site and within the wider landscape that also provides plentiful foraging and commuting opportunities for bats. On this basis, the proposed development is considered unlikely to result in the loss or degradation of bat foraging and commuting habitat or sever important commuting routes and obstruct access between potential bat roosts and important foraging habitats, providing the mitigation measures in relation to lighting described below are implemented during the construction and operational phase of the proposed development. It is recommended that any new artificial lighting associated with the proposed development aims to:
- Maintain a dark corridor along the Site boundaries;
 - Use minimum light levels necessary. For example, there should be times throughout the evening (when bats are most active) when all outdoor security lights are unlit to avoid affecting bat activity. Lighting can also be installed using a timer or movement sensor to avoid long periods of an area being lit at night;
 - Lighting should be a warm white spectrum and feature peak wavelengths higher than 550nm to lower the range of species affected by lighting. Using LED luminaires where possible and avoid luminaires with UV elements, specifically avoiding metal halide and fluorescent sources (Institute of Lighting Professionals, 2023); and
 - Internal luminaries can be recessed where installed in proximity to windows to reduce glare (Institute of Lighting Professionals, 2023) and light spill and use hoods, louvres or other similar design features to avoid light spill and direct light away from areas of mature vegetation.

Hazel Dormice

- 5.3.25 Hazel dormice *Muscardinus avellanarius* are EPS and are afforded protection under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act, 1981 (as amended). Dormice are also listed as SPI under the NERC Act 2006.
- 5.3.26 The Site supported some suitable semi-natural habitat for dormice comprising scattered trees and hedgerow within a vegetated garden, with some arboreal connectivity to more suitable dormouse habitat, such as woodland, located north of the Site. However, given these habitats form part of a well-maintained formal garden, they are subject to regular maintenance and associated disturbance, are



without a canopy or understorey, less than 2m wide and comprise less than three species of poor diversity. On this basis, these habitats are considered to provide low structural complexity for dormice (Wells, et al., 2025).

- 5.3.27 Therefore, in accordance with best practice guidelines (Wells, et al., 2025), the habitats on Site are considered to be no more than 'fair' quality for dormice.
- 5.3.28 Overall, the Site was considered to therefore provide very limited sub-optimal foraging, commuting, nest building and hibernating opportunities for dormice.
- 5.3.29 It should be noted that all suitable dormouse habitat is to be retained as part of the proposed development and only grassland of a short sward, introduced shrubs and ruderal/ephemeral vegetation is anticipated to be lost to facilitate the proposals.
- 5.3.30 On this basis, the proposed development is considered unlikely to result in the death or injury, or disturbance to dormice or result in the damage or destruction of a dormouse breeding site or resting place, providing the avoidance and mitigation measures detailed below are adhered to.
- 5.3.31 It is therefore recommended that the lighting mitigation strategy, as detailed in paragraph 5.3.24 above, be adhered to.
- 5.3.32 This is further supported by guidance detailed by Natural England. For European protected species (such as dormice) Natural England's stance is that: "If the consultant ecologist, on the basis of survey information and specialist knowledge or the species concerned, considers that on balance the proposed activity is reasonably unlikely to result in an offence under Regulation 41 or 45 then no licence is required" (Natural England, 2013).

Great Crested Newts and other Amphibians

- 5.3.33 GCN are EPS and are afforded protection under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act, 1981 (as amended). GCN and common toad *Bufo bufo* are also listed as SPI under the NERC Act 2006.
- 5.3.34 Overall, three waterbodies were identified within Site. A GCN HSI assessment was undertaken on waterbodies WB1 and WB3 (Table 10) which identified the waterbodies as being of 'poor' habitat suitability to support breeding GCN, likely due to the small scale of the waterbodies and that they were absent of macrophyte vegetation considered suitable for egg laying opportunities. Waterbody WB2 comprised a swimming pool with steep concrete sides that is chemically treated and therefore considered to provide negligible opportunities for breeding GCN. Therefore, GCN were considered to provide very limited opportunities for GCN during their aquatic lifecycle phase.
- 5.3.35 The Site supported shrubs, ephemeral vegetation and to a lesser extent, the grassland of a short sward, which were considered to provide some foraging and commuting opportunities for GCN during their terrestrial lifecycle phase.
- 5.3.36 An additional three waterbodies were identified within a 500m radius of the Site as part of the desk study. These comprised one pond and two swimming pools. Given the swimming pools support steep concrete sides and are likely chemically treated, they are considered to provide negligible opportunities for breeding GCN.
- 5.3.37 The pond was located approximately 93m north of the Site and considered located within terrestrial habitat considered suitable for GCN during their aquatic lifecycle phase, with suitable habitat connectivity to the terrestrial habitats on Site.
- 5.3.38 The location of the waterbodies can be seen in Appendix VI.
- 5.3.39 Direct impacts on suitable waterbodies for breeding GCN are not anticipated. However, the proposed development could result in adverse direct and indirect impacts on GCN, resulting in the death or injury, or disturbance to GCN during their terrestrial phase or result in the damage or destruction of a GCN resting place such as a hibernation site.



- 5.3.40 This is supported by the rapid risk assessment tool within the GCN license application form (WML-A14-2), which was used to assess the risk of the proposed development on GCN. Based on the current proposal that comprises approximately 0.02ha of suitable terrestrial habitat loss/damage within 100m of the potential GCN breeding waterbody to the north of the Site, the tool indicates an 'amber' risk meaning the risk of an offence being committed is considered to be likely.
- 5.3.41 It is therefore recommended that a GCN HSI assessment (ARG, 2010) of all waterbodies within a 500m radius of the Site be undertaken to determine the value and potential of the waterbodies to support breeding GCN. An HSI assessment is a tool, which can be undertaken at any time of the year and enables a quick assessment of the likelihood of a waterbody to support GCN, which can be used as a guide to determine the need for further GCN surveys. Depending on the HSI findings, further GCN presence/likely absence surveys may be required. These comprise a minimum of four survey visits during the period mid-March to mid-June with at least two of these visits during mid-April to mid-May and with the visits spread throughout the survey period. Should GCN presence be confirmed then two additional survey visits will be required in order to determine the population size class, with at least one of these additional survey visits being undertaken between mid-April and mid-May. Another survey technique which has been approved by Natural England and can be used for determining GCN presence/likely absence is eDNA water testing. This technique detects pond occupancy from GCN by analysing traces of GCN DNA shed into the pond environment (eDNA). This technique is recommended when a full suite of traditional GCN presence/likely absence surveys cannot be undertaken, for example when the key survey windows are missed. However, this technique cannot be used to ascertain population size; therefore, in the event that GCN DNA is recorded within any waterbodies, traditional survey techniques must still be used to obtain population data.
- 5.3.42 It should be noted that should a GCN be found, a EPSM licence may be required to permit works that would potentially cause disturbance, damage or destruction of habitat or individuals. A EPSM licence for development is issued by Natural England under Regulation 53(2)(e) of The Conservation of Habitats and Species Regulations (2017). This application process can take a minimum of six weeks.
- 5.3.43 Another option could be to join the District Licensing (DL) scheme. DL is a streamlined and alternative option to the traditional surveys, mitigation and compensation and the licensing process detailed above. This is a strategic approach, funded by developer contributions, which allows habitat compensation to be delivered elsewhere in the district to ensure that local conservation status of GCN can be maintained. Compensatory habitat is created off site by a third party prior to development and developers pay a fee based on an estimated impact on GCN. Consequently, no survey work or mitigation and compensations measures (e.g. fencing, trapping and post-development monitoring) are necessarily required. However, DLL is not likely to be the best option for all developments and in some instances is more costly than the traditional surveys, mitigation and compensation and the licensing process detailed above.
- 5.3.44 The first step in DL is submitting an enquiry form to NatureSpace Partnership. Once submitted, NatureSpace Partnership will assess whether the project qualifies for DL. If the project does qualify, NatureSpace Partnership will assess the Site and all of the information provided and provide a Impact Assessment and Conservation Payment Certificate stating how much the developer will have to pay to compensate for the loss of the suitable habitat on-site, as well as a fee for joining the DLL scheme.

Reptiles

- 5.3.45 Native, widespread reptile species (common or viviparous lizard *Zootoca vivipara*, adder *Vipera berus*, grass snake *Natrix helvetica* and slow worm *Anguis fragilis*) are protected under Schedule 5 of The Wildlife and Countryside Act 1981 (as amended), making it an offence to kill or injure individual animals. All widespread reptile species are also listed as SPI under the NERC Act 2006.
- 5.3.46 Habitats recorded within the Site particularly the shrubs, ephemeral vegetation and to a lesser extent, the grassland of a short sward, were considered to provide foraging, commuting, basking and sheltering opportunities for reptiles. However, as the habitats within the Site are maintained at a short



sward length as part of a regularly maintained garden, the opportunities for foraging, commuting, basking and sheltering for reptiles would be limited and only a small number of common reptiles are considered likely to be present. On this basis a full reptile presence/likely absence survey is not considered necessary.

- 5.3.47 In order to comply with legislation protecting reptiles the mitigation measures detailed below should be adhered to.
- 5.3.48 It is recommended that clearance of the vegetated garden be undertaken using a sensitive vegetation clearance approach whereby a two phased cut is undertaken, firstly reducing the vegetation to 150mm above ground level, and then after a 24hr period, reducing the vegetation to ground level. Vegetation clearance should be undertaken in a south to north direction, making these areas unsuitable for reptiles. This will encourage them to disperse into retained semi-natural habitats immediately north of the Site. The timing of these works should coincide with reptiles being active in April to September inclusive (generally in dry, warm weather and greater than 9°C air temperature).
- 5.3.49 It should be noted that the above recommendations are subject to change, depending on the findings of the further recommended GCN surveys.

Birds

- 5.3.50 All birds, their nests and eggs are protected from killing and injury of individuals, damage and destruction of nests and destruction of eggs under the Wildlife and Countryside Act 1981 (as amended). Species listed in Schedule 1 (Part 1) of the Act are also protected from disturbance whilst nesting or whilst with dependent young, by special penalties. Many bird species are also listed as SPI under the NERC Act 2006.
- 5.3.51 The Site supported buildings, trees and shrubs, which were considered to provide good nesting and foraging opportunities to a wide range of common bird species.
- 5.3.52 Works associated with any proposed development of the Site, for example habitat clearance or building conversion, could therefore result in direct adverse impacts on nesting birds. On this basis, nesting birds are therefore considered a potential ecological constraint. In order to comply with legislation protecting nesting birds the mitigation measures detailed below should be adhered to.
- 5.3.53 It is recommended that habitat clearance works be undertaken outside the main nesting bird season. The nesting bird season for most British bird species is between March and August (inclusive).
- 5.3.54 Should this not be possible, all suitable nesting habitat must be inspected by an ecologist to determine the presence/absence of any nesting birds prior to clearance. In the event of an active nest being identified, a temporary exclusion zone would need to be placed around the nest and development paused until the dependent young have fledged which may be several weeks. The ecologist will determine safe working distances and the distances will be dependent upon the bird species present.
- 5.3.55 The permanent loss of suitable foraging and nesting habitat for birds should be compensated for by incorporating new suitable foraging and nesting habitat into the landscape designs. Habitat creation examples including planting a variety of native fruit and nut bearing tree and shrub species such as birch *Betula* spp., holly *Ilex aquifolium*, rowan *Sorbus aucuparia*, elder *Sambucus nigra* and crab apple *Malus sylvestris*.
- 5.3.56 Artificial bird nest boxes should also be installed onto any retained trees within the Site. Given their designation as SPI, particular consideration should be given to the installation of starling (i.e. Schwegler 3S or similar) nest boxes and/or general bird nest boxes used by house sparrow *Passer domesticus* and spotted flycatcher *Muscicapa striata* (i.e. Schwegler 1B, 2HW, 2GR or similar).

Badgers

- 5.3.57 Badgers *Meles meles* and their setts are protected under The Badger Act (1992).



- 5.3.58 No evidence of badger field signs (for example hairs, latrines, dung pits, snuffle holes, mammal paths or scratching posts) or setts were recorded within the Site or within 30m of all but the northern extent of the proposed development footprint.
- 5.3.59 Habitats throughout the Site were considered to provide some sett building and foraging and commuting opportunities for badgers, although this is considered limited given the Site is a well-maintained residential property.
- 5.3.60 Given the absence of setts within the Site and 30m radius, where access permitted, the proposed development is considered unlikely to result in the damage or destruction of a sett, or obstructing access to a sett, and disturbance to a badger whilst it is occupying a sett.
- 5.3.61 However, given the suitable foraging and commuting habitat within the immediate Site and due to the mobile nature of the species and its ability to quickly establish new setts, badgers are still considered a potential ecological constraint to the proposed development.
- 5.3.62 As a precautionary approach, it is recommended that a pre-works survey be undertaken immediately prior to the proposed development becoming operational to ensure no new setts have become established.
- 5.3.63 During construction works, all excavations should be excavated individually and back filled immediately after where possible. Where this is not possible excavations must be covered to prevent badgers (or other animals) becoming trapped within the excavation. If this is not possible, one or both sides of the excavation must be sloped in order to allow egress from the excavation.

Other Mammal Species

Water Voles, Otters and Beavers

- 5.3.64 Water voles *Arvicola amphibious* and their places of shelter are protected under the Wildlife and Countryside Act, 1981 (as amended) which makes it an offence to kill, injure or take any water vole, damage, destroy or obstruct access to any place of shelter or protection that the animals are using, or disturb voles while they are using such a place. Water voles are also listed as SPI under the NERC Act 2006.
- 5.3.65 Otters *Lutra lutra* are protected under the Conservation of Habitats and Species Regulations (2017) and under the Wildlife and Countryside Act, 1981 (as amended) which makes it an offence to kill, injure or capture an otter, intentionally or recklessly disturb otters; or to damage, destroy or intentionally or recklessly obstruct access to a holt or other resting places. Otters are also listed as SPI under the NERC Act 2006.
- 5.3.66 Eurasian beavers *Castor fiber* are protected under the Conservation of Habitats and Species Regulations (2017) and under the Wildlife and Countryside Act, 1981 (as amended) which makes it an offence to kill, injure or capture a beaver, deliberately disturb beavers; or to damage or destroy the breeding site or resting place of a beaver.
- 5.3.67 No aquatic and very limited suitable terrestrial habitat was recorded within the Site and immediate surroundings.
- 5.3.68 Due to the size of waterbodies WB1 and WB3 (that they form small garden ponds), and given their isolation from a connected network of waterbodies, particularly a large tributary, waterbodies WB1 and WB3 are considered highly unlikely to support a viable population of water voles, otters or beavers. The waterbodies were shallow and lacked sufficient vegetation which would provide appropriate space, cover or seclusion for water voles, otters and beavers. Therefore, waterbodies WB1 and WB3 are considered unlikely to support water voles.
- 5.3.69 On this basis, the Site was identified as having negligible potential to support water vole, otters and beavers and are therefore not considered an ecological constraint and are not considered further in this report.



European Hedgehog

- 5.3.70 The European hedgehog *Erinaceus europaeus* is classified as an SPI under the NERC Act 2006. Therefore, the presence of this species on site would be a material consideration in the planning process.
- 5.3.71 The Site supported some suitable semi-natural habitat for hedgehogs in the form of shrubs and ephemeral vegetation. However, the proposed development is considered unlikely to result in impacts on European hedgehogs given the size and nature of the Site and presence of other suitable habitat within the wider surroundings and providing mitigation measures detailed below are adhered to.
- 5.3.72 Hedgehogs should be specifically watched for during the removal of features considered to provide potential sheltering habitat. If any hedgehogs are found, they should be carefully moved to retained areas of vegetation outside of the Site.
- 5.3.73 Furthermore, any new boundaries required as part of the proposed development should be permeable to hedgehogs in order to main habitat connectivity across the Site and wider surroundings. This can be achieved by creating ground-level boundary holes (approximately 13cm x 13cm) which should link as many neighbouring land parcels as possible.
- 5.3.74 In addition, parcels of dense scrub, shrubs and tussocky grassland and features such as deadwood and brash piles should be maintained and/or created across the Site in order to provide important foraging and nesting opportunities for hedgehogs.

Invertebrates

- 5.3.75 A number of invertebrate species such as stag beetles *Lucanus cervus* are afforded protection under the Conservation of Habitats and Species Regulations 2017 and under Schedule 5 of the Wildlife and Countryside Act, 1981 (as amended). Many invertebrate species including the stag beetle are also listed as SPI under the NERC Act 2006.
- 5.3.76 The white-clawed crayfish *Austropotamobius pallipes*, a freshwater invertebrate species, is also listed on Schedule 5 of the Wildlife and Countryside Act, 1981 (as amended).
- 5.3.77 All protected invertebrate species listed on Schedule 5 of the Wildlife and Countryside Act, 1981 (as amended) identified within the search area as part of the desk study are considered likely absent from the Site as their preferred food plants were either absent or not recorded in sufficient quantity to otherwise support a viable population.
- 5.3.78 In addition, the Site was considered to provide very limited opportunities for protected and notable invertebrate species given the absence of invertebrate microhabitats such as woodland edge, herb-rich grassland habitats and deadwood. Protected and notable invertebrate species are therefore not considered an ecological constraint and are not considered further in this report.

Plants

- 5.3.79 Wild plants are protected under the Wildlife and Countryside Act 1981 (as amended) which prohibits the unauthorised intentional uprooting of any wild plant species and forbids any picking, uprooting or destruction of plants listed on Schedule 8 of which there are over 150 species. In addition, nine plant species are afforded protection under the Conservation of Habitats and Species Regulations 2017. Many plant species are also listed as SPI under the NERC Act 2006.
- 5.3.80 The habitats on Site were common and widespread and therefore provided limited potential to support protected and notable and rare plant species.
- 5.3.81 Section 14(1) of the Wildlife and Countryside Act 1981 (as amended) makes it illegal to plant or otherwise cause to grow in the wild any plant listed in Schedule 9 of the Act including montbretia.
- 5.3.82 Stands of montbretia were recorded within the eastern extent of Site, within formal planted beds there.



- 5.3.83 In addition, one Sussex invasive non-native species (Sussex INNS), cherry laurel, was recorded within the planted beds, notably within the south-eastern extent of the Site.
- 5.3.84 The southern and south-eastern extents of the Site are located outside of the proposed development footprint. Therefore, impacts which would result in the spread of invasive non-native species, such as trimming or pruning, are not anticipated.
- 5.3.85 However, in the event that the proposals change, works associated with any proposed development of the Site, for example habitat clearance or maintenance, including trimming or pruning, could therefore result in the spread of cherry laurel or montbretia. On this basis, invasive plant species are considered a potential ecological constraint. In order to comply with legislation regarding invasive plant species, the mitigation measures detailed below should be adhered to.
- 5.3.86 Any habitat clearance works associated with the proposed development of the Site should safely manage and correctly remove and dispose of the cherry laurel and montbretia in order to prevent their spread.

5.4 Ecological Enhancements

- 5.4.1 Under Section 40 of the NERC Act 2006 there is a duty to have regard to biodiversity conservation. In addition, the NPPF (2024) and the Mid Sussex District Plan 2014-2031 (Mid Sussex District Council, 2018) encourages ecological enhancement to be integrated into development projects in order to achieve an overall net-gain in biodiversity. Given the above, the following enhancement recommendations should be considered and incorporated into the final design proposals:
- Installation and maintenance of artificial bat bricks or bat tubes (i.e. Schwegler 1FR and 2FR bat tubes and Schwegler 1GS bat brick or similar) into any new buildings and installation of bat boxes (i.e. Schwegler 2FN or similar) on to suitable retained trees to increase the roosting opportunities for bats within the Site. Any artificial roosting features should be placed between 3m and 6m above ground in a variety of locations at slightly different heights and preferably positioned facing a variety of directions.
 - Installation and maintenance of artificial bird nest boxes onto any retained trees and new buildings on Site to increase nesting opportunities for many bird species. Given their designation as SPI, particular consideration should be given to installing house sparrow (i.e. Schwegler 1SP or similar) and starling *Sturnus vulgaris* (i.e. Schwegler 3S or similar) nest boxes onto any retained trees and any new buildings within the Site.
 - Planting of native species rich hedgerows and/or 'natural buffer strips' along the access roads and plot boundaries. Approximately five woody plants should be planted per metre of hedgerow, in double staggered rows. The hedgerow should be managed on an annual rotation, whereby half of each hedgerow is cut in any one year. This will encourage a diverse structure to produce both a wide and dense hedgerow. Woody species planted could include the following species:
 - Oak *Quercus* sp;
 - Hazel *Corylus avellana*;
 - Hawthorn *Crataegus monogyna*;
 - Blackthorn *Prunus spinosa*;
 - Field maple *Acer campestre*;
 - Holly *Ilex aquifolium*;
 - Elder *Sambucus nigra*; and
 - Crab apple.



- Enhancements of the ponds for wildlife. Ponds provide valuable foraging opportunities for a wide variety of protected and notable species including amphibians and reptiles, particularly grass snakes. As general guidance, any newly created pond(s) should exhibit shallow pond margins (less than 5°) to allow marginal vegetation to grow and should contain deeper open areas (at least 60 cm) within the centre of the pond. In addition, consideration should be given to the planting of additional marginal plant species including:
 - Branched bur reed *Sparganium erectum*;
 - Broad-leaved pondweed *Potamogeton natans*;
 - Yellow iris *Iris pseudocorus*;
 - Floating sweet-grass *Glyceria fluitans*;
 - Greater pond sedge *Carex riparia*;
 - Marsh marigold *Caltha palustris*;
 - Meadowsweet *Filipendula ulmaria*;
 - Water forget-me-not *Myosotis scorpioides*;
 - Water mint *Mentha aquatic*; and
 - Water plantain *Alisma plantago aquatic*.



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7 APPENDICES

Appendix I: Site Location Plan



LEGEND:

Site Boundary

STATUS:

FOR INFORMATION ONLY

Sussex Office: Rocks Yard, Victoria Rd, Herstmonceux, Hailsham, BN27 4TQ.
T: 01323 832120.

Kent Office: The Watermill, Maidstone Road, Ashford, Kent, TN26 1AE.
T: 01233 225365

E: contact@pjcoconsultancy.com
W: <https://www.pjcoconsultancy.com>

CLIENT:

Mr David Shankland

PROJECT:

Birchgrove Farmhouse Barns
East Sussex
RH17 7BT

TITLE:

Appendix I: Site Location Plan

SCALE AT A4:
1:5,681

DRAWN:
NS

APPROVED:
NS

PROJECTION:
EPSG:27700

DATE:
01/10/25

DATE:
22/10/25

DRAWING No:

PJC/6759E/25/A1/V1

Basemap: Google Satellite (obtained through QuickMapServices QGIS plugin), Map data © Google



Appendix II: Legislation and Planning Policy

Legislation

The Conservation of Habitats and Species (Amendment) Regulations 2017

The Conservation of Habitats and Species (Amendment) Regulations 2017 is the UK transposition of the European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, or the 'Habitats Directive'. The directive provides protection of key habitats and species of European importance. Those key habitats and species are listed in Annexes II and IV of the directive.

Those species protected under the regulations and most likely encountered during development include:

- All bat species
- Hazel dormouse
- Great crested newt
- Common otter

The Environment Act (2021)

The Environment Act (2021) is the UK's framework of environmental protection, post Brexit, and provides binding targets for improving air quality, water, biodiversity, and waste reduction. The Environment Act requires all development schemes in England (that are subject to Town and Country Planning Act 1990) to deliver a mandatory 10% biodiversity net gain (BNG) to be maintained for a period of at least 30 years. The concept seeks measurable improvements for biodiversity by creating or enhancing habitats in association with development. Key parts of the Environment Act 2021 which relate to BNG and its delivery are Part 6: Nature and Biodiversity and the supporting Schedule 14, particularly sections 9(3), 13(1), 14(2) and 15.

The Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the primary legislation for the protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats (the 'Bern Convention') and the European Union Directives on the Conservation of Wild Birds (79/409/EEC) and Natural Habitats and Wild Fauna and Flora (92/43/EEC) are implemented in Great Britain. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants respectively. The Countryside and Rights of Way (CROW) Act 2000 makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site

Those species protected under the act and most likely encountered during development include:

- All bat species
- All nesting birds
- Hazel dormouse
- Great crested newt
- Common otter
- Water vole
- All native reptile species



- White-clawed crayfish

The Protection of Badgers Act 1992

The Protection of Badgers Act 1992 consolidates and strengthens previous legislation (including the Badgers (Further Protection) Act 1991). Under the act, it is an offence to:

- Wilfully kill, injure or take a badger (or attempt to do so).
- Cruelly ill-treat a badger.
- Dig for a badger.
- Intentionally or recklessly damage or destroy a badger sett, or obstruct access to it.
- Cause a dog to enter a badger sett.
- Disturb a badger when it is occupying a sett.

The Natural Environment and Rural Communities Act (NERC) 2006

Section 40 of the Act requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'. Section 41 of the Act provides a list of habitats and species, which are of 'principal importance for the conservation of biodiversity.' This list aids decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications.

Hedgerows Regulations 1997

These regulations were produced to protect important countryside hedges from removal. The regulations only cover hedgerows that are at least 20m long or, if shorter, connected to other hedgerows at both ends or part of a longer hedgerow. They must be in or adjacent to common land, village greens, site of special scientific interest, local nature reserves, or land used for agriculture, forestry or breeding or keeping of horses, ponies or donkeys.

Wild Mammals (Protection) Act 1996

All wild mammals are protected against intentional acts of cruelty under the above legislation. This makes it an offence to mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

This legislation is of relevance when undertaking works with potential to affect wild mammals e.g. works near burrows, warrens or dens, regardless of other legislative protection.

Species and Habitat Specific Legislation

Plants

Wild plants are protected under Section 13 of the Wildlife and Countryside Act 1981 (as amended). It prohibits the unauthorised intentional uprooting of any wild plant species and forbids any picking, uprooting or destruction of plants listed on Schedule 8 of which there are over 150.

The Conservation of Habitats and Species Regulations 2017 have nine plants listed within Annex IV these are; creeping marshwort *Apium repens*, early gentian *Gentianella anglica*, fen orchid *Liparis loeselii*, floating-leaved water plantain *Luronium natans*, killamey fern *Trichomanes speciosum*, lady's slipper *Cypripedium calceolus*, shore dock *Rumex rupestris*, slender naiad *Najas flexilis*, and yellow marsh saxifrage *Saxifraga hirculus*. It is an offence to deliberately pick, collect cut, uproot or destroy any protected plant, or keep, transport, sell, or exchange, any live or dead such plant species, this applies to all stages of its life cycle.



Invasive Species

Schedule 9, Section 14 of the Wildlife and Countryside Act (1981, as amended) prohibits the introduction into the wild of any species that is not ordinarily resident in and is not a regular visitor to Great Britain in a wild state, or any species of the 69 plants listed on Schedule 9.

The frequently encountered invasive species within proposed development sites include floating pennywort *Hydrocotyle ranunculoides*, giant hogweed *Heracleum mantegazzianum*, Himalayan balsam *Impatiens glandulifera*, Japanese knotweed *Fallopia japonica*, New Zealand pygmyweed *Crassula helmsii*, rhododendron *Rhododendron ponticum* and certain hybrids of the above, some species may be native yet are listed for conservation purposes.

Plant or soil material contaminated by Japanese knotweed that is to be discarded is considered to be a 'controlled waste' under the Environmental Protection Act 1990 (EPA 1990). It is an offence to deposit, treat, keep, or dispose of controlled waste without a licence. Furthermore, knotweed that has been cut down and removed must be received by an authorised person to be disposed of correctly. A licence can be obtained from the Environment Agency (EA). The release or planting of a listed species in the wild can be permitted under a licence granted by the relevant statutory body.

Invertebrates

A number of invertebrates such as silver studded blue butterfly *Plebejus argus*, stag beetles *Lucanus cervus* and white letter hairstreak *Stymondia w-album* are fully protected under Schedule 5 of the Wildlife and Countryside Act (1981, as amended). This legislation makes it illegal to intentionally kill, injure, or take a protected invertebrate, or to damage, destroy, or obstruct access to any structure or place used for shelter or protection by such a species; and disturb any protected species occupying such a structure or place.

Three invertebrates are listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2017, fisher's estuarine moth *Gortyna borelii lunata*, the large blue butterfly *Maculinea arion* and lesser whirlpool ram's-horn snail *Anisus vorticulus*. It is an offence deliberately to kill, capture, or disturb a listed species, or to damage or destroy the breeding site or resting place of such an animal.

Amphibians

There are four widespread amphibian species, common frog *Rana temporaria*, common toad *Bufo bufo*, palmate newt *Lissotriton helveticus* and smooth newt *Lissotriton vulgaris*. All of the four widespread species receive partial protection under Schedule 5 of the Wildlife and Countryside Act (1981, as amended) making it an offence to offer them for sale or trade.

Great crested newts *Triturus cristatus* and natterjack toads *Epidalea calamita* are fully protected under Schedule 5 (in respect of section 9(4)(b) and (c) and (5) only) of the Wildlife and Countryside Act (1981, as amended) and the Conservation of Habitats and Species Regulations 2017. Reintroduced populations of 'native' pool frogs *Pelophylax lessonae* also receive the same protection. It is illegal to possess a protected species (alive or dead), deliberately capture, injure or kill, to intentionally or recklessly disturb, or to deliberately take or destroy the eggs of these protected species. It is also illegal to damage, destroy or intentionally or recklessly obstruct access to breeding or resting place used by these protected species'. All life stages of each species' are afforded the same level of protection.

In order to undertake any activity, which would, otherwise result in any of the above offences being committed, it may be necessary to obtain a European Protected Species (EPS) licence from the relevant statutory body (Natural England (NE), Countryside Council for Wales (CCW) or Scottish Natural Heritage (SNH)). It is possible to undertake surveys which would otherwise involve unlawful acts, such



as disturbance, by obtaining a survey license which provides authorisation for scientific and educational purposes

Reptiles

The four common reptile species, adder *Vipera berus*, grass snake *Natrix helvetica*, common lizard *Zootoca vivipara* and slow worm *Anguis fragilis* are protected under Schedule 5 of the Wildlife and Countryside Act (1981, as amended) against deliberate and/or intentional killing, injuring and trade.

If common reptile species are found to be present or considered potentially present within a proposed development site. To ensure that no subsequent offence will be committed a precautionary method of working (written by a suitably qualified ecologist) and submitted to the relevant authority may be required to enable works to proceed with limited risks of offences being caused.

Birds

All birds, their nests and eggs are protected by the Wildlife and Countryside Act (1981, as amended). It is an offence to intentionally kill, injure, or take any wild bird, or take or destroy an egg of any wild bird. It is also an offence to damage or destroy the nest of any wild bird (whilst being built, or in use). Therefore, clearance of vegetation within the site boundary, or immediately adjacent to the site during the nesting season could result in an offence occurring under the Act. The bird breeding season can be taken to run between the 1 February and 31 August and is subject to geographical and seasonal factors. There are 79 species of birds listed under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). It is an offence to intentionally or recklessly disturb any wild bird listed on Schedule 1 while it is nest building, or at a nest containing eggs or young, or disturb the dependent young of such a bird.

Barn owls *Tyto alba* are given the highest level of legal protection possible under Schedule 1 of the Wildlife and Countryside Act 1981. It is therefore illegal to kill, injure or take a barn owl, or to take or destroy its eggs. It is also illegal to intentionally or recklessly take, damage, or destroy the nest of any wild bird while it is in use or being built, release or allow the escape of a barn owl into the wild or possess any bird (dead or alive) or part of bird without a licence which is obtainable through the country agencies (EN, SNH, and CCW).

Badgers

Badgers *Meles meles* are protected under the Protection of Badgers Act (1992) and the Wildlife and Countryside Act (1981, as amended). As such it is an offence to wilfully take, kill, injure or ill-treat a badger, or possess a dead badger or any part of a badger. Under the Act their setts are also protected against obstruction, destruction, or damage in any part.

Sett interference includes damaging or destroying a sett, obstructing access to a sett, and disturbing a badger whilst it is occupying a sett. The Act defines a badger sett as 'any structure or place, which displays signs indicating the current use by a badger' and Natural England takes this definition to include seasonally used setts.

Work that may disturb badgers or their setts is illegal without a development licence from the relevant statutory body (NE, CCW, SNH). As a precautionary principle, a buffer distance between a badger sett and the works will be determined, based upon guidance from an appropriately experienced ecologist. This buffer distance should be based upon the size and activity levels at the sett, the topography between the sett and the works and the nature of the works.

Bats

All native UK bat species are fully protected by UK law under Schedule 5 (in respect of section 9(4)(b) and (c) and (5) only) and Schedule 6 of the Wildlife and Countryside Act (1981, as amended), and under Schedule 2 of the Conservation of Habitats and Species Regulations 2017. It is illegal to deliberately



capture, injure or kill a bat or to intentionally or recklessly disturb bats. It is also illegal to damage, destroy or intentionally or recklessly obstruct access to a breeding or resting place used by a bat.

Any activity that would result in a contravention of the above legislation would likely require an EPS licence from the relevant statutory body (NE, CCW or SNH). Works or mitigation activities involving interference with bats or bat shelters must be carried out by a licensed bat worker.

Dormice

Dormice *Muscardinus avellanarius* are protected under Schedule 5 (in respect of section 9(4)(b) and (c) and (5) only) of the Wildlife and Countryside Act (1981, as amended) and are listed in Schedule 2 of the Conservation of Habitats and Species Regulations 2017. Under the current legislation it is illegal to intentionally or deliberately kill, injure or capture dormice, deliberately disturb dormice (whether in a nest or not); or to damage, or destroy dormouse breeding sites or resting places.

Any activity that would result in a contravention of the above legislation would likely require an EPS licence from the relevant statutory body (NE, CCW or SNH).

Otters

The otter *Lutra lutra* is fully protected under Schedule 5 (in respect of section 9(4)(b) and (c) and (5) only) of the Wildlife and Countryside Act (1981, as amended) and are listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2017. It is therefore illegal to deliberately capture, injure or kill an otter, possess an otter (dead or alive), or any other part of an otter, or intentionally or recklessly disturb otters. It is also illegal to damage, destroy or intentionally or recklessly obstruct access to a holt or other resting place used by an otter.

Any activity that would result in a contravention of the above legislation would likely require an EPS licence from the relevant statutory body (NE, CCW or SNH).

Water voles

Water voles *Arvicola amphibious* are protected under Schedule 5 of the Wildlife and Countryside Act (1981, as amended). It is an offence to possess, control or sell water voles or to intentionally kill, injure or take water voles. It is also an offence to intentionally or recklessly damage, destroy or obstruct access to a place that water voles use for shelter or protection or disturb water voles whilst using such a place.

A licence is required for catching/handling water voles, or for field surveys that are intrusive or disturbing where the surveyor suspects' water voles are present. A licence can be obtained by applying to the relevant statutory body (NE, SNH, and CCW,). Please note that the legislation does not permit licences to be issued in relation to development of land.

Biodiversity Policies

National Planning Policy Framework (NPPF) 2024

Published in 2024 the NPPF sets out the Government's planning policies for England and how these are expected to be applied by local authorities. It replaces all the Planning Policy Statements and Guidance (PPSs and PPGs). The NPPF emphasises the need for sustainable development, whilst specifying the need for protection of designated sites and priority habitats and priority species (as listed in section 41 of the Natural Environment and Rural Communities (NERC) Act 2006). Paragraph 187 of The National Planning Policy Framework (NPPF) states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:



- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”

Paragraph 192 states that “to protect and enhance biodiversity and geodiversity, plans should:

- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”

Furthermore, paragraph 193 states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for



biodiversity or enhance public access to nature where this is appropriate.

Paragraph 194 states:

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

- potential Special Protection Areas and possible Special Areas of Conservation;
- listed or proposed Ramsar sites; and
- sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.”

Paragraph 195 states:

“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”

The UK Biodiversity Framework (2011-2020).

The UK Biodiversity Framework is an important framework that is owned, governed and implemented by the four UK countries, assisted by Defra and JNCC in their UK co-ordination capacities. Although differing in details and approach, the four UK countries have published strategies which promote the same principles and address the same global targets: joining-up our approach to biodiversity across sectors; and identifying, valuing and protecting our ‘Natural Capital’ to protect national well-being now and in the future. This new framework has been developed to enhance the recovery of priority habitats and species in England (published under section 41 of the NERC Act 2006), thereby contributing to the delivery of the England Biodiversity Strategy. The framework has been developed and endorsed by the England Biodiversity Group and wider partnership. It is the starting point for a more integrated approach to biodiversity conservation in England, building on the strengths of the former UK Biodiversity Action Plan (BAP) process and improving those areas where insufficient progress was being made.

Mid Sussex District Plan 2014-2031

The above plan sets out the relevant policies for the control of development in regard to the natural environment and biodiversity.

DP37: Trees, Woodland and Hedgerows

Strategic Objectives: 3) To protect valued landscapes for their visual, historical and biodiversity qualities; 4) To protect valued characteristics of the built environment for their historical and visual qualities; and 5) To create and maintain easily accessible green infrastructure, green corridors and spaces around and within the towns and villages to act as wildlife corridors, sustainable transport links and leisure and recreational routes.

Evidence Base: Green Infrastructure mapping; Mid Sussex Ancient Woodland Survey, Tree and Woodland Management Guidelines, Tree Preservation Order records.

The District Council will support the protection and enhancement of trees, woodland and hedgerows, and encourage new planting. In particular, ancient woodland and aged or veteran trees will be protected.



Development that will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance, will not normally be permitted.

Proposals for new trees, woodland and hedgerows should be of suitable species, usually native, and where required for visual, noise or light screening purposes, trees, woodland and hedgerows should be of a size and species that will achieve this purpose.

Trees, woodland and hedgerows will be protected and enhanced by ensuring development:

- incorporates existing important trees, woodland and hedgerows into the design of new development and its landscape scheme; and
- prevents damage to root systems and takes account of expected future growth; and
- where possible, incorporates retained trees, woodland and hedgerows within public open space rather than private space to safeguard their long-term management; and
- has appropriate protection measures throughout the development process; and
- takes opportunities to plant new trees, woodland and hedgerows within the new development to enhance on-site green infrastructure and increase resilience to the effects of climate change; and does not sever ecological corridors created by these assets. Proposals for works to trees will be considered taking into account:
 - the condition and health of the trees; and
 - the contribution of the trees to the character and visual amenity of the local area; and
 - the amenity and nature conservation value of the trees; and
 - the extent and impact of the works; and
 - any replanting proposals.

The felling of protected trees will only be permitted if there is no appropriate alternative. Where a protected tree or group of trees is felled, a replacement tree or group of trees, on a minimum of a 1:1 basis and of an appropriate size and type, will normally be required. The replanting should take place as close to the felled tree or trees as possible having regard to the proximity of adjacent properties.

Development should be positioned as far as possible from ancient woodland with a minimum buffer of 15 metres maintained between ancient woodland and the development boundary.

DP38: Biodiversity

Strategic Objectives: 3) To protect valued landscapes for their visual, historical and biodiversity qualities; and 5) To create and maintain easily accessible green infrastructure, green corridors and spaces around and within the towns and villages to act as wildlife corridors, sustainable transport links and leisure and recreational routes.

Evidence Base: Biodiversity 2020; Biodiversity Action Plan; Biodiversity Opportunity Areas; Green Infrastructure mapping; Habitats and Species Records; Mid Sussex Ancient Woodland Survey; Mid Sussex Infrastructure Delivery Plan; The Natural Choice: Securing the Value of Nature; West Sussex SNCI Register.

Biodiversity will be protected and enhanced by ensuring development:

- Contributes and takes opportunities to improve, enhance, manage and restore biodiversity and



green infrastructure, so that there is a net gain in biodiversity, including through creating new designated sites and locally relevant habitats, and incorporating biodiversity features within developments; and

- Protects existing biodiversity, so that there is no net loss of biodiversity. Appropriate measures should be taken to avoid and reduce disturbance to sensitive habitats and species. Unavoidable damage to biodiversity must be offset through ecological enhancements and mitigation measures (or compensation measures in exceptional circumstances); and
- Minimises habitat and species fragmentation and maximises opportunities to enhance and restore ecological corridors to connect natural habitats and increase coherence and resilience; and
- Promotes the restoration, management and expansion of priority habitats in the District; and
- Avoids damage to, protects and enhances the special characteristics of internationally designated Special Protection Areas, Special Areas of Conservation; nationally designated Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty; and locally designated Sites of Nature Conservation Importance, Local Nature Reserves and Ancient Woodland or to other areas identified as being of nature conservation or geological interest, including wildlife corridors, aged or veteran trees, Biodiversity Opportunity Areas, and Nature Improvement Areas.
- Designated sites will be given protection and appropriate weight according to their importance and the contribution they make to wider ecological networks.
- Valued soils will be protected and enhanced, including the best and most versatile agricultural land, and development should not contribute to unacceptable levels of soil pollution.
- Geodiversity will be protected by ensuring development prevents harm to geological conservation interests, and where possible, enhances such interests. Geological conservation interests include Regionally Important Geological and Geomorphological Sites.



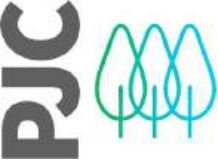
Appendix III: Ecological Walkover Survey Map



LEGEND:

- Existing Tree
- Other native hedgerow
- Developed land; sealed surface
- Ornamental lake or pond
- Watercourse footprint
- Vegetated garden
- Site Boundary

STATUS: FOR INFORMATION ONLY



Sussex Office: Rocks Yard, Victoria Rd, Herstmonceux, Hailsham, BN27 4TQ.
T: 01323 832120.

Kent Office: The Watermill, Maidstone Road, Ashford, Kent, TN26 1AE.
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CLIENT: Mr David Shankland

PROJECT: Birchgrove Farmhouse Barns
East Sussex
RH17 7BT

TITLE: Appendix III: Ecological Walkover
Survey Map

SCALE AT A4: 1:547.3	DRAWN: NS	APPROVED: NS
PROJECTION: EPSG:27700	DATE: 01/10/25	DATE: 22/10/25

DRAWING No: PJC/6759E/25/A3/V1



Appendix IV: Site Photographs

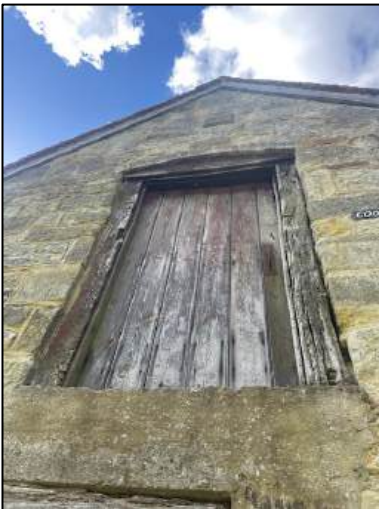
All photographs were taken by Nicolle Stevens BSc (Hons) ACIEEM on 9th September 2025.



Photograph 1: The eastern elevation of building B1. Photograph showing the lifted roof tiles here.



Photograph 2: Gaps in the external stonework of building B1.



Photograph 3: A gap between a doorframe and the wall of building B1.



Photograph 4: A mortise and tenon joint within building B1.



Photograph 5: Damage to the stonework internally within building B1.



Photograph 6: The upper level of building B1.



Photograph 7: The lower level of building B1.



Photograph 8: One of the bat droppings within building B1.



Photograph 9: The south-western elevation of building B2. Photograph showing the lifted weatherboarding here.



Photograph 10: The eastern elevation of building B2. Photograph showing the lifted tiles here.



Photograph 11: The internals of building B2.



Photograph 12: Buildings B3 and B4 from left to right.



Photograph 13: The internal of the western extent of building B4.



Photograph 14: The south-eastern elevation of building B4.



Photograph 15: The internal of the eastern extent of building B4.



Photograph 14: Building B5.



Photograph 15: Building B6.



Photograph 16: Waterbody WB1.



Photograph 17: Waterbody WB3.



Photograph 18: Waterbody WB2.



Photograph 19: Tree T1.



Appendix V: Bat DNA Analysis

Folio No: 4178-2025
Purchase Order: 6579E
Contact: PJC Consultancy Ltd
Issue Date: 09.10.2025
Received Date: 26.09.2025

Biological Report

Technical Report



SureScreen Scientifics

Biological Sample Analysis

Summary

Most biological materials (tissue, feces, hair, blood, etc.) contain small amounts of DNA from the organism of which it originated. Using molecular methods such as PCR (polymerase chain reaction) and DNA sequencing, SureScreen Scientifics are able to analyze an unknown sample to determine which species the sample originates from our methods are optimized for the detection of species including bats (over 92% of bat species worldwide can be identified including all 18 UK bat species), mammals; bees, wasps & hornets; birds; fish; plants (from roots, leaves, stem and even dried wood) and many more species.

Results

Lab ID	Site Name	OS Reference	Sample Type	Species Name	Match(%)
B5697	Stone Barn	TQ39969 30074	Bat Dropping	Brown long-eared bat (Plecotus auritus)	99.50
Genetic Sequence ACTATCATAATCGGGAGGCTTCGGGAACTGATTGGTGCCACTAATAATTGGAGCCCCTGATATAGCTTTTCCCCGA ATAAATAACATAAGCTTCTGACTGCTTCCCCCATCTTTTCTACTACTTTTAGCTTCGTCTGCAGTAGAGGCTGGAGC AGGTACCGGTTGAACAGTCTATCCTCCTTTAGCGGGAAACCTAGCCACGCATGGAGAG					

Matters affecting result: none
Reported by: Jennifer Higginbottom

Approved by: Consuela Sopronyi



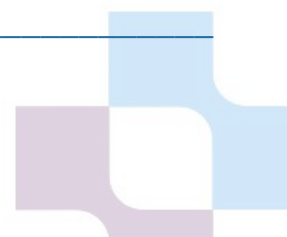
Methodology

Once samples have arrived in the laboratory, the DNA is isolated using a commercial DNA extraction kit. Using PCR, DNA (if present within the sample) is amplified using universal molecular markers designed to amplify a short fragment of the DNA of the target species group (i.e. mammal, fish, arthropod, reptile, plant etc.). If amplification is successful, the resulting DNA sequence is revealed using a process known as Sanger Sequencing in order to obtain the genetic sequence of the mitochondrial gene within the sample. The sequence results are aligned against a library of known reference sequences using bioinformatics software, which enables us to determine which species the DNA sequence from the sample matches with, informing the species identity and sequence similarity (match %).

If the initial analysis is unsuccessful, the entire process is repeated up to two additional times with a fresh reserve sample (if available) in order to obtain a species identification. If no DNA is detected after three attempts, then we can be confident that any further analysis of the sample will likely also fail to result in species identification.

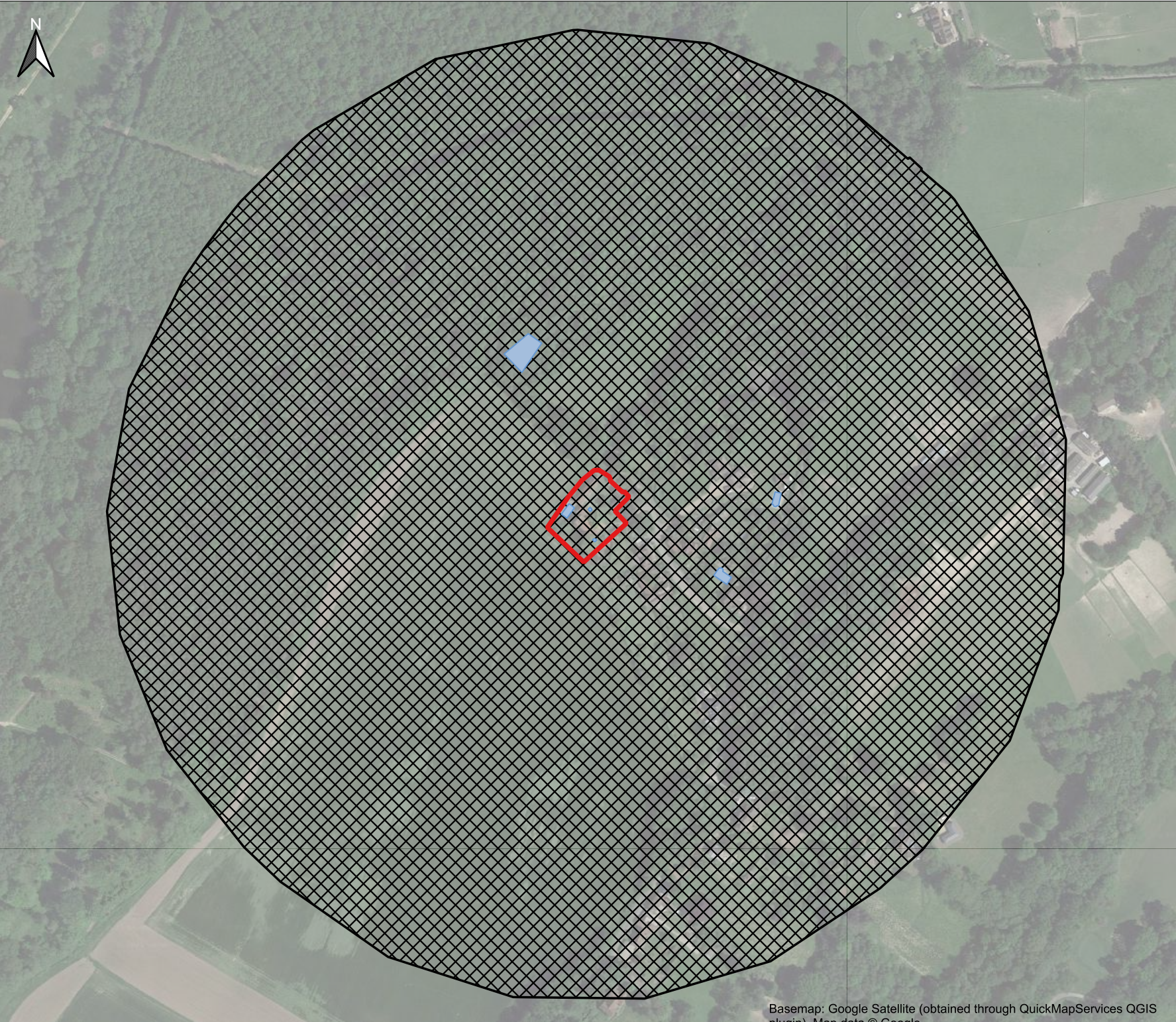
Interpretation of Results

- Sample Type:** The sample you send to us can come from a variety of sources. Fecal, dropping, urine, hair, blood, carcass (skin, flesh, bone), gamete, plant matter or unknown biological material all contain DNA that we can test for in order to identify the species of origin.
- Genetic Sequence:** The unique DNA sequence obtained from the sample.
- Match (%):** How closely matched the DNA sequence from your sample is to the sequences within our reference database. This can be interpreted as a score of result accuracy, with the maximum score of 100% indicating an exact match of the sample to the indicated species' reference sequence. Lower scores (80-99%) indicate some variation between the sample and reference sequence, likely due to natural variation between individual genetic sequences and/or systematic variations generated through the sequencing process. Scores below 80% similarity should be interpreted with care and can indicate part degraded or part contaminated samples.
- Inconclusive Result:**
- Degraded sample:**
DNA is degraded and we are unable to determine species identification due to degradation of sample DNA. This can happen either before sample collection (old samples, exposure to UV etc.) or after sample collection if stored for long periods before analysis or not handled correctly.
- Inhibited/contaminated sample:**
We are unable to determine species identity due to contamination or the suspected presence of large quantities of PCR inhibitors. Contamination sources can originate from other species which could have come into contact with the samples, or human contamination during sample collection.
- Alternative Result:** Sometimes, for targets such as bat dropping analysis, other mammalian species such as rodents are detected. We find this to be a common occurrence as some bat droppings can be similar in appearance to rodent droppings. Although sometimes unexpected, repeat analyses in these cases would likely return the same results.





Appendix VI: Waterbody Location Plan



LEGEND:

Waterbody

Site Boundary

STATUS: FOR INFORMATION ONLY

PJC

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CLIENT: Mr David Shankland

PROJECT:
Birchgrove Farmhouse Barns
East Sussex
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TITLE:
Appendix VI: Waterbody Location
Plan

SCALE AT A4: 1:5,681	DRAWN: NS	APPROVED: NS
PROJECTION: EPSG:27700	DATE: 01/10/25	DATE: 22/10/25

DRAWING No:
PJC/6759E/25/A6/V1



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