

Duckyls Farm Centre, Selsfield Road, West Hoathly

Preliminary Ecological Appraisal

A Report for Keri Strugnell of Duckyls Farm
Centre

July 2026



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Preliminary Ecological Appraisal

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1 PROJECT OVERVIEW

Client: Keri Strugnell of Duckyls Farm Centre

Site Address: Duckyls Farm Centre, Selsfield Road, West Hoathly, East Grinstead, West Sussex, RH19 4QY

Attending Ecologist: Hana Ketley BA (Hons) BSc (Hons), Ecologist

Survey Date(s): 17th June 2025

Site Proposals: The proposed development of two agricultural buildings, a 10x14m wood workshop and a 13x45m barn.

Associated Planning Reference Number: Not yet submitted.

Source of Relevant Documents:

Document:	Source:
Application Boundary:	GML Architects – Site Location Plan
Site Location Plan:	Google Earth Pro
Desk Study:	Magic Map (Magic.defra.gov.uk)
Proposed Development:	GML Architects – Proposed Site Plan – 5117/PA/10B

2 NON-TECHNICAL SUMMARY

- 2.1 In response to the proposed development at Duckyls Farm Centre, East Grinstead ('the Site'), a Preliminary Ecological Appraisal (PEA) of land within the redline boundary has been undertaken.
- 2.2 The Site occupies approximately 0.48ha and comprises a hedgerow, grassland, bramble scrub, bare ground, crop planting, a building and scattered trees.
- 2.3 Development of the Site is unlikely to impact designated sites or areas of ancient woodland. Recommendations have been provided to protect an adjacent area of deciduous woodland, a Habitat of Principal Importance (HPI) as listed on s41 of the NERC Act 2006.
- 2.4 Retained trees should be protected in accordance with BS 5837:2012 'Trees in relation to design, demolition and construction.'
- 2.5 No evidence of badger was recorded. However, the habitats present are suitable for the species and should a period of >6 months pass, an update badger survey should be conducted.
- 2.6 Current proposals anticipate the retention of all trees and suitable dormice habitat. Should proposals change and these habitats require removal, further considerations to bats and dormice will be required.
- 2.7 Precautionary working methods to protect GCN and reptiles have been recommended.
- 2.8 Timings and methods of best practice for nesting birds are required.
- 2.9 Proposed biodiversity enhancements for the Site, in accordance with the requirements of the National Planning Policy Framework (NPPF) 2024, include:
- Installation of 2 x tree-mounted / integrated bird boxes
 - Installation of 2 x tree-mounted / integrated bat boxes
 - Installation of a hedgehog box
 - Incorporation of a wildlife-friendly planting scheme
- 2.10 Provided the recommendations given within this report are implemented, the proposed development will not contravene any relevant legislation or planning policies pursuant to nature conservation.

3 INTRODUCTION

3.1 Context

3.1.1 In response to a proposed development at Duckyls Farm Centre, East Grinstead (hereafter referred to as ‘the Site’), a Preliminary Ecological Appraisal (PEA) of land within the redline boundary was undertaken (see UKHab Plan, Figure 1).

3.1.2 The Site’s suitability to support protected and/or notable species and habitats was assessed and appropriate recommendations for further surveys and mitigation, where required, are provided within Section 6 of this report. Opportunities for biodiversity enhancements in-line with the NPPF 2024 are presented in Section 7. Ecological features of interest are depicted in Figure 1: UKHab Plan and photographs of the Site are provided in Appendix A.

3.2 Site Location

3.2.1 The Site is located between Selsfield Common and West Hoathly, in East Grinstead, West Sussex, at National Grid Reference: TQ 35534 33737. The location of the Site is depicted in Image 1, below.



Image 1 – Geographical Location of the Site

3.3 Site Description

3.3.1 The Site occupies approximately 0.48ha and comprises a hedgerow, grassland, bramble scrub, bare ground, crop planting, a building and scattered trees.

3.3.2 The Site is bounded by grassland to the north, east and south, and a residential property with associated garden to the west.

3.3.3 The wider landscape is rural in nature, comprising scattered residential properties with associated landscaping, Selsfield road, agricultural fields, and blocks of woodland.

3.4 Legislation and Planning Policy

3.4.1 Relevant legislation and policies that apply to ecological issues within England and Wales are:

- [The Conservation of Habitats and Species Regulations 2017 \(as amended\)](#)
- [The Environment Act 2021](#)
- [The Wildlife and Countryside Act 1981 \(as amended\)](#)
- [The Countryside Rights of Way Act 2000](#)
- [The Natural Environment and Rural Communities \(NERC\) Act 2006](#)
- [Hedgerows Regulations 1997](#)
- [The Protection of Badgers Act 1992](#)
- [The Wild Mammal \(Protection\) Act 1996](#)
- [The National Planning Policy Framework \(NPPF\) 2024](#)
- [Government Circular 06/05](#)
- [Mid Sussex District Plan 2014 – 2031](#)

3.4.2 The above summary serves as guidance only. Further information is presented in Appendix B.

3.5 Objectives of the Survey

3.5.1 The objectives of the survey were to:

- Classify the main habitats present within the Site.
- Evaluate the ecological importance of these habitats.
- Assess the suitability for protected species and any otherwise notable species to occur within the Site.
- Provide appropriate recommendations for further surveys and mitigation where required as well as opportunities for biodiversity enhancement.

4 METHODS

4.1 Desk Study

4.1.1 A desk study was undertaken in July 2025 to determine the presence of sites and habitats of conservation importance, along with existing records of freely available European Protected Species records of relevance to the Site.

4.1.2 The following bodies were consulted for the desk study:

- Google Earth Pro for aerial imagery.
- Magic Map (Magic.defra.gov.org) for statutory designated sites, Habitats of Principal Importance (HPIs), European Protected Species Mitigation Licences (EPSMLs) and GCN pond survey and class licence return records.
- OS mapping for ponds within 250m of the Site.

4.1.3 The desk study involved obtaining the following information:

- International statutory designated sites within 2km.
- National statutory designated sites within 2km.
- European protected species records on MAGIC within 2km
- Ancient woodland parcels within 30m.
- Waterbodies within 250m.
- HPIs (NERC Act 2006) within or immediately adjacent to the Site.

4.1.4 These search areas are considered sufficient to cover the potential zone of influence of the proposed development.

4.2 Habitats

UK Habs Survey

4.2.1 The Site was surveyed using the UK Habitat Classification system (UKHabs). The techniques applied during the survey involve identifying the main plant communities present on the Site and classifying the habitat types following the UKHabs criteria. This technique provides an inventory of the habitat types present and enables areas of greater botanical interest which may require further, more detailed, surveys to be identified.

4.2.2 Any occurrences of recognised invasive non-native species as listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were also noted, if present.

4.2.3 A map of the habitats and areas of interest (using a variation of the standard UKHab styles) is provided in Figure 1. Photographs of features of interest are presented in Appendix A.

- 4.2.4 The survey was undertaken by GES Ecologist Hana Ketley, BA (Hons) BSc (Hons), on 17th June 2025.

4.3 Protected and Notable Species

- 4.3.1 The survey was extended to consider the suitability of the Site to support protected and notable species. Species considered included those identified during the desk study, or those considered appropriate by the surveyor during the survey. Detailed surveys were not completed for these species. However, based on an understanding of species ecology, consideration was given to the Site's potential to provide sheltering or foraging habitat and/or connectivity from other areas of potentially suitable habitat to allow dispersal between populations. Core species considered during the survey are outlined below.

Badger

- 4.3.2 Evidence of badger *Meles meles* activity within the Site was assessed by searching for signs such as:

- Presence of setts, indicated by suitably sized holes or burrows.
- Evidence of badger latrines, badger hair and/or footprints.
- Evidence of well-used runs supported by secondary evidence such as foraging signs.

Bats

Foraging and Commuting Habitat Assessment

- 4.3.3 An assessment of suitable foraging, commuting, roosting and swarming habitat for bats both within the Site and adjacent habitats was carried out in accordance with current good practice guidance (Collins, 2023). The presence of features suitable for bat foraging or commuting was noted and the assessment enabled the Site and surrounds to be categorised as having either 'none,' 'negligible,' 'low,' 'moderate,' or 'high' suitability for bats.

Ground Level Tree Assessment (GLTA)

- 4.3.4 A GLTA of trees within the Site was carried out in accordance with current good practice guidance (Collins, 2023). Trees were inspected for potential roosting features (PRFs) such as splits, fissures, cavities, delaminated bark, heavy ivy *Hedera* sp. cover and woodpecker holes. Evidence such as droppings, staining and bats themselves were searched for below suitable features. Each tree was categorised as having:

- PRFs suitable for individual bats (PRF-I)
- PRFs suitable for multiple bats (PRF-M)
- Further assessment required (FAR)
- No PRFs.

- 4.3.5 The above information was used to determine the level (if any) of further surveys required in respect of tree-roosting bats.

Preliminary Roost Assessment

- 4.3.6 A full external and internal inspection was undertaken of all the buildings present within the Site, with the use of high-powered torch (where required). Any suitable roosting or access points for bats such as raised fascia boards, missing/lifted tiles, cracks or crevices in brick/blockwork and gaps in soffit boxes were recorded and searched for evidence of use by bats (staining, droppings, scratch marks, or the bats themselves). The results of the scoping survey enabled the buildings to be categorised as having either 'none,' 'negligible,' 'low,' 'moderate,' or 'high' suitability for roosting bats. Where evidence of bats was recorded, the building was also categorised as being a 'confirmed' roost.

- 4.3.7 The above information was used to determine the level (if any) of further surveys required in respect of bat roosts in buildings.

Dormouse

- 4.3.8 The Site was surveyed for suitable hazel dormouse *Muscardinus avellanarius* habitat, such as the presence of well-connected broadleaved woodland, hedgerows, mature scrub and suitable food sources such as oak *Quercus sp.*, hazel *Corylus avellana* and other nut-bearing trees, fruiting trees and shrubs and flowers.

Great Crested Newts (GCN)

- 4.3.9 Any suitable terrestrial habitat for great crested newts (GCN) *Triturus cristatus* was recorded including long grass, tall ruderal, woodland and hedgerow borders, as well as wood and rubble piles that act as sheltering places.

Habitat Suitability Index (HSI)

- 4.3.10 Where access was available, an assessment of the suitability of each waterbody within 250m of the Site to support GCN was undertaken using a simplified version of the HSI assessment methodology developed by Oldham *et al.* (2000) (ARG, 2010). The HSI incorporates ten suitability indices, all of which are factors considered to affect GCN:

- Location (in Britain)
- Pond area
- Desiccation rate (years out of ten that pond dries)
- Water quality (subjective assessment)
- Percentage of pond shade

- Presence of waterfowl
- Fish population (subjective assessment)
- Number of ponds within 1km
- Terrestrial habitat quality
- Percentage macrophyte cover

4.3.11 The results of the HSI provide a numerical index of between 0 and 1, whereby 0 indicates potentially unsuitable habitat and 1 indicates potentially optimal habitat. The details of the HSI scoring criteria are provided in Table 1. The location of waterbodies within 250m of the Site is shown in Figure 2: Waterbodies within 250m.

Table 1 – HSI Scoring Criteria

HSI Score	Pond Suitability for GCN
<0.50	Poor
0.50 – 0.59	Below Average
0.60 – 0.69	Average
0.70 – 0.79	Good
>0.80	Excellent

Reptiles

4.3.12 The Site was assessed for any suitable habitat for reptiles, including long grass, vegetated boundaries, woodland and hedgerow borders, as well as wood and rubble piles that provide sheltering opportunities.

Nesting Birds

4.3.13 The habitats within the Site were assessed for their suitability to support nesting birds. Factors considered include suitable cover and feeding habitat. Evidence was searched for in the form of any active or disused birds' nests.

4.4 Constraints

General Constraints

- 4.4.1 Any measurements or indications of area provided within this report are estimates and are provided as a guide only.
- 4.4.2 Access to waterbody WB1 was denied, therefore no HSI assessment was undertaken.
- 4.4.3 It should be noted that the absence of a species from biological records cannot be taken to represent actual absence. Species distribution patterns should be interpreted with caution as they may reflect survey/reporting effort rather than actual distribution.

5 RESULTS

5.1 Desk Study

Designated Sites

- 5.1.1 Statutory sites identified within the potential zone of influence of the proposed development are presented in Table 2 below.

Table 2 – Designated Sites within ZOI of the development

Site Name	Description	Distance and Orientation from Site
Statutory Designated Sites		
Internationally Designated Sites (Ramsar) & UK National Site Network (SPA, SAC) – <i>None within 2km</i>		
Nationally Designated Sites (SSSI, NNR, LNR)		
Wakehurst & Chiddingly Woods SSSI	<i>Extensive exposures of sandrock, a nationally rare habitat, which are of biological and geological importance. This site has the richest sandrock community in the country, supporting a unique flora. It is the locality of an uncommon crane fly, and also has a diverse breeding community of woodland birds.</i>	950m SW

(SPA – Special Protection Area, SAC – Special Area of Conservation, SSSI – Site of Special Scientific Interest, NNR – National Nature Reserve, LNR – Local Nature Reserve)

SSSI Impact Risk Zones (IRZs)

- 5.1.2 The Site lies within the IRZ of Wakehurst & Chiddingly Woods SSSI, Weir Wood Reservoir SSSI, Stone Hill Rocks SSSI, Worth Forest SSSI and Ashdown Forest SSSI (and the Ashdown Forest SPA/SAC that the SSSIs underpin).

Ancient Woodland

- 5.1.3 The desk study returned no records of ancient woodland parcels within 30m of the Site.

NERC s41 Habitats of Principal Importance (HPI)

- 5.1.4 The desk study returned no records of a habitat listed under s41 of the NERC Act 2006 within the Site itself. However, deciduous woodland, a NERC s41 HPI, is present along the west boundary of the Site.

Protected and Notable Species

- 5.1.5 Existing records of European Protected Species Mitigation (EPSM) licences returned by the desk study are presented in Table 3 below.

Table 3 – Relevant Records of EPSM licences within 2km of the Site

Licence No.	Species	Details	Distance and Orientation from Site
2018-33742-EPS-AD2	Bat (Brown long-eared <i>Plecotus auritus</i> , common pipistrelle <i>Pipistrellus pipistrellus</i> and soprano pipistrelle <i>Pipistrellus pygmaeus</i>)	Destruction of a breeding site and resting place (2018-2023)	0.6km NW
2018-37539-EPS-MIT	Bat (Brown long-eared and common pipistrelle)	Destruction of a breeding site and resting place (2018-2028)	0.8km NW
EPSM2013-5865	Bat (Common pipistrelle, brown long-eared and serotine <i>Eptesicus serotinus</i>)	Destruction of a resting place (2013-2017)	1.3km SE
2018-35130-EPS-MIT	Great crested newt	Damage and destruction of a resting place (2018-2024)	1.6km SE

5.1.6 Three great crested newt Class Survey Licence Returns from 2017 were also present 1.4km, 1.6km and 1.7km to the south-east of the Site.

5.2 Habitats

UK Habs Survey

5.2.1 The following habitat types were recorded within the Site on 17th June 2025:

- Modified grassland
- Bramble scrub
- Artificially unvegetated, unsealed surface
- Horticulture
- Individual trees
- Bare ground
- Hedgerow
- Building

5.2.2 A summary of the key botanical species present within each habitat type are included within the descriptions below. While considering this information reference should be made to the UKHab Plan presented in Figure 1 and photographs presented in Appendix A.

Modified grassland

- 5.2.3 The habitat which occupies the largest area within the Site is modified grassland. Three areas are present: a strip within the south of the Site (G1) which has a more varied sward length, a maintained 'lawn' within the centre of the Site (G2) with a sward length of <5cm, and a small area in front of a polytunnel (G3).
- 5.2.4 Grass species present within G2, the largest area of modified grassland within the Site, include abundant Yorkshire-fog *Holcus lanatus*, occasional perennial rye-grass *Lolium perenne*, and rare sweet vernal-grass *Anthoxanthum odoratum*. Herbaceous species present include abundant white clover *Trifolium repens*, occasional creeping buttercup *Ranunculus repens*, and rare creeping thistle *Cirsium arvense*, spear thistle *Cirsium vulgare* and woolly thistle *Cirsium eriophorum*. A pile of hay and manure is present on the north boundary of the Site, as well as smaller piles of compost, denoted as TN2 on Figure 1. The grassland area in front of the polytunnel (G3) supports the same species as above.
- 5.2.5 The strip around the edge of the Site (G1) supports similar species composition to the above, including frequent Yorkshire fog, occasional perennial rye-grass and rare white clover, but also contains frequent nettle *Urtica dioica* and ground-ivy *Glechoma hederacea*, and occasional annual meadow-grass *Poa annua*, creeping thistle *Cirsium arvense*, broad-leaved dock *Rumex obtusifolius* and cock's-foot *Dactylis glomerata*. G1 also contains log piles, denoted as TN3 on Figure 1.

Bramble scrub

- 5.2.6 An area of bramble scrub (S1) is present in the north-east corner of the Site, dominated by bramble *Rubus fruticosus agg.*, with frequent common nettle also present.

Artificially unvegetated, unsealed surface

- 5.2.7 Two areas of unsealed surface are present within the Site. HS1 comprises a road and a car park. The surface is gravel and contains no vegetation. A chalk pile is present within the road, next to the polytunnel, denoted as TN1 on Figure 1.

Horticulture

- 5.2.8 Two areas within the Site have been planted with crops. A polytunnel is present along the gravel road (C1), and an area mainly surrounded by chicken-wire fencing is present within the modified grassland (C2).

Individual trees

- 5.2.9 Four trees are present within the Site. T1 is a mature oak *Quercus rubor*, T2 is a plum *Prunus domestica*, and T3 and T4 are apple *Malus domestica* trees. All are present within the grassland.

Bare ground

- 5.2.10 An area of bare ground (BG1) is present in front of building B1 (see below for description) and along the north east section of the road. Species present include abundant annual meadow-grass, frequent nettle, and occasional creeping thistle, white clover and greater plantain *Plantago major*. A long, unvegetated, loose earth bund is present within this habitat.

Hedgerow

- 5.2.11 One hedgerow with trees is present along the west boundary of the Site (H1), along the road. Species present include abundant bramble, which dominates the understory, abundant *rhododendron* sp., and frequent cherry laurel *Prunus laurocerasus*, blackthorn *Prunus spinosa* and hornbeam *Carpinus betulus*. Occasional hawthorn *Crataegus monogyna* and dog-rose *Rosa canina* are also present. The ground cover includes frequent false oat-grass *Arrhenatherum elatius*, occasional cleavers, nettle and cock's-foot.

Building

- 5.2.12 One building is present within the Site. B1 is a shed used for storage, with wooden weatherboarding walls and a bitumen felt roof.

5.3 Protected and Notable Species*Badger*

- 5.3.1 The within the Site habitats provide suitable foraging, commuting and refuge habitat for badger.
- 5.3.2 The raised earth bund provides suitable opportunity for sett creation.
- 5.3.3 No signs of badger or their setts were observed during the survey.

Bats

- 5.3.4 The trees, hedgerow, grassland and scrub provide suitable foraging and commuting opportunities for bats. Furthermore, the Site is well connected to areas of broadleaved woodland and grassland which provide foraging opportunities within the surrounding landscape.

Roosting Habitat – Trees

- 5.3.5 A detailed ground-level roost assessment was undertaken of the trees within the Site. Table 4 below provides a description of each tree and their locations are depicted on Figure 1.

Table 4 – Trees with bat roost suitability within the Site

Tree Ref	Species	PRFs	Level of Suitability
T1	Oak	Crack running up the trunk for at least 3 metres, with several areas of ingress into the tree, on the west aspect of the tree. Several areas of lifting bark on the west aspect of the tree. A fissure is present on a branch on the north-west aspect of the tree.	PRF-M
T2	Wild Plum	None	None
T3	Apple	None	None
T4	Apple	None	None

Roosting Habitat – Buildings

- 5.3.6 One building is present within the Site. Table 5 below provides a description of the building and its location is depicted on Figure 1.

Table 5 – Building Descriptions and Suitability to Support Roosting Bats

Building Ref	Description	PRFs (and any evidence found?)	Suitable Access Points	Level of Suitability
B1	Shed with tongue and groove weatherboard walls, and a pitched roof with bitumen felt.	Gap in door.	Gap in door.	Negligible

Dormouse

- 5.3.7 No evidence of dormouse was recorded during the survey. The hedgerow and scrub provide suitable hazel dormouse habitat.

Great Crested NewtTerrestrial Habitat

- 5.3.8 The longer grassland areas, scrub and hedgerow base provide suitable terrestrial foraging habitat for GCN, whilst the hay and log pile provide suitable sheltering places.

Aquatic Habitat

- 5.3.9 A review of available online OS mapping identified two ponds and two ditches within 250m of the Site, as depicted on Figure 2.
- 5.3.10 Waterbody WB1, a garden pond, was inaccessible at the time of survey. Waterbody WB2, a woodland pond, and ditch D1 were dry at the time of survey and consequently no HSI could be undertaken. Ditch D2 contained running water making it unsuitable for GCN and consequently no HSI was undertaken of this ditch.

Reptiles

- 5.3.11 The longer grassland, scrub, log piles and to a lesser degree the hedgerow base provide suitable habitat for reptiles.

Nesting Birds

- 5.3.12 No nesting birds or disused nests were recorded during the survey. Suitable nesting habitat is present within the Site in the form of scrub, the building, the hedgerow and scattered trees.

Other Species

- 5.3.13 The habitats recorded within the Site provide optimal foraging and resting places for European hedgehog, a “Notable” species and SPI listed under s41 of the NERC Act 2006.
- 5.3.14 Beyond those noted above, the survey identified negligible suitability for other species of conservation concern within the Site.

6 EVALUATION AND RECOMMENDATIONS

6.1 Designated Sites

Statutory Designated Sites

Internationally Designated Sites

- 6.1.1 The desk study returned no records of Internationally Designated Sites within 2km of the Site.

Nationally Designated Sites

- 6.1.2 The desk study returned one record of Nationally Designated Sites within 2km of the Site.
- 6.1.3 Wakehurst & Chiddingly Woods SSSI is located approximately 950m southwest of the Site. Due to the limited size of the proposed development and nature of the proposals, it is considered unlikely that the proposed development will impact on any designated sites.

SSSI Impact Risk Zones (IRZs)

- 6.1.4 The Site lies within the IRZ of Wakehurst & Chiddingly Woods SSSI, Weir Wood Reservoir SSSI, Stone Hill Rocks SSSI, Worth Forest SSSI and Ashdown Forest SSSI (and the Ashdown Forest SPA/SAC that the SSSIs underpin).
- 6.1.5 The development site is within the zone of influence for recreational pressure impacts for the Ashdown Forest SPA/SAC. However, as the proposals are for agricultural barns, this will not include any net increase in residential units. Therefore, there will be no impacts as a result of the proposed development on Internationally, or Nationally designated sites. Therefore, no consultation with Natural England is required.

6.2 Ancient Woodland

- 6.2.1 Guidance from Natural England and the Forestry Commission state that no development should occur within 15m of an ancient woodland. The proposed development lies beyond 15m of any ancient woodland and therefore no detrimental impacts to ancient woodland will occur.

6.3 Habitats and Botanical Species of Interest

- 6.3.1 The NERC s41 HPI, of 'deciduous woodland' is located directly adjacent to the western boundary of the Site. In response, measures to ensure that the proposed development does not result in any adverse impacts upon this woodland will be required. To ensure the integrity of the woodland habitat is maintained, the following measures should be implemented in full and set out within a Construction and Environmental Management Plan (CEMP), or similar, secured by a suitably worded planning condition:

- The within the Site, hedgerow and adjacent woodland should be protected by HERAS security fencing (or similar) with fine-mesh dust netting installed along the extent prior to the commencement of development works.
- To minimise the impacts, where practical trees within the Site should be retained and to avoid impacts inclusive of root compaction and collision damage, retained trees should be protected in accordance with the British Standard (BS) '5837:2012 Trees in Relation to Design, Demolition and Construction'. An example of such protection is presented in Figure 3.
- Where loss is unavoidable, trees should be replaced on a like-for-like basis using native species such as pedunculate oak, small-leaved lime *Tilia cordata*, wild service tree *Sorbus torminalis*, or similar.
- A 'no drive/materials storage' policy should be implemented within 5m of the woodland.
- Drainage channels and trenches should be designed to ensure that water and sediment from the construction site does not enter the woodland.

6.3.2 Implementation of the above measures will ensure that no loss or deterioration of the woodland will result from the proposed development and the works will be conducted in accordance with the requirements of the NPPF and the guidance set out to protect broad-leaved woodland sites.

6.4 Protected and Notable Species

Badger

6.4.1 Although suitable habitat for badger is present within the Site, no evidence of badger was recorded and no further consideration to the presence of badgers is required at this time.

6.4.2 However, badgers are a highly mobile species that will readily move into new areas and as badgers and their setts are protected under the Protection of Badgers Act 1992, should 6 months elapse between the survey date and the commencement of works, an update survey of the Site for evidence of badgers should be undertaken.

Bats

Commuting and Foraging Habitat

6.4.3 The boundary vegetation, trees, grassland and scrub all provide suitable foraging and commuting habitat for bats. Furthermore, the Site is well connected to other areas of suitable habitat. However, the majority of the habitat is unsuitable short sward grassland and the size of the Site is limited. Therefore, activity surveys are considered disproportionate in this instance.

Roosting Habitat – Trees

- 6.4.4 A detailed ground-level roost assessment of trees within the Site identified one tree with 'PRF-M' suitability to support roosting bats. Current plans show the retention of T1. Bats, and their roosts, are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). Therefore, should proposals change, and the tree require removal, further considerations to bats within trees would be required. Should this be the case, further surveys would be conducted in line with the Bat Conservation Trust's (BCT) 'Bat Survey for Professional Ecologists, Good Practice Guidelines' (Collins, 2023), as detailed within Table 6 below.

Table 6 – Trees with Bat Roost Suitability

Tree Reference	Tree Species	Bat Roost Suitability	Number and Type of Further Survey(s) Required
T1	Oak	PRF-M	Climbing of tree using ropes or a MEWP and endoscope of suitable features. Should features not be able to be fully accessed during climbing, further emergence surveys may be required.
T2	Wild plum	None	No further action required
T3	Apple	None	No further action required
T4	Apple	None	No further action required

Roosting Habitat – Buildings

- 6.4.5 An internal and external assessment of all the buildings within the Site identified the presence of no buildings with suitability for roosting bats. Therefore, no further surveys of B1 are required, in-line with BCT guidelines (Collins, 2023).
- 6.4.6 Since lighting can be detrimental to bats using vegetation for foraging and commuting, any external lighting proposed for the development should be sensitive to the trees, woodland, and hedgerow, avoiding direct illumination of them. The lighting scheme should be designed using guidance provided by the Bat Conservation Trust ([BCT & ILP, 2023](#)). Potential design measures include:
- Use of LED lighting, which does not emit UV and which has a warm white light spectrum (ideally <2700Kelvin) and uses wavelengths higher than 550nm.
 - Internal lighting adjacent to windows being recessed to reduce glare and light spill.
 - Directional lighting, such as specialist bollards, low-level downward direction lighting or column lighting to minimise light spill.
 - Use of motion sensor lighting or timers to restrict lighting to required periods.
 - Dimming or part-night lighting to reduce light levels when bats are most active.
 - Use of the lowest lux possible.

Dormouse

- 6.4.7 The hedgerow and scrub provide suitable habitat for dormice within the Site. Current proposals anticipate the retention of all suitable dormouse habitat. Dormice, and their breeding/resting places, are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). Therefore, should these habitats be affected by the proposed development, further surveys to determine the presence/likely absence of dormice would be required.

Great Crested Newt

- 6.4.8 The longer grassland areas, scrub and hedgerow base are considered suitable for the species during its terrestrial phase. Areas of modified grassland and bare ground will be removed to facilitate the proposed development.
- 6.4.9 Four waterbodies were identified within 250m of the Site. WB2 and D1 were dry at the time of survey and consequently no HSI could be undertaken. D2 was not subject to HSI assessment as the ditch contained running water making it unsuitable for GCN. No access could be obtained to WB1.
- 6.4.10 Given the lack of reproductive opportunities and the limited terrestrial habitat to be affected, further surveys for GCN are considered disproportionate in this instance.
- 6.4.11 Proposals are restricted to the removal of 0.08ha of sub-optimal modified grassland. The grassland to be removed is of sub-optimal suitability for GCN due to intensive management regimes resulting in a very low sward height providing only foraging suitability (see Photo 1 and 2, Appendix A). The hedgerow and scrub are to be retained. Nevertheless, the Site is within 5.5m of WB1 which is within the core movement zone for GCNs. Therefore, there is a risk that occasional roaming GCN may enter the Site and be injured or killed.
- 6.4.12 Given the above, the area of sub-optimal modified grassland habitat to be removed, c.0.08ha, was input into Natural England's 'Rapid Risk Assessment' calculator tool, this produces a result of 'Amber: Offence Likely' (see Image 2 below).

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability score
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	0.01 - 0.1 ha lost or damaged	0.3
Land 100-250m from any breeding pond(s)	0.01 - 0.1 ha lost or damaged	0.01
Land >250m from any breeding pond(s)	No effect	0
Individual great crested newts	No effect	0
	Maximum:	0.3
Rapid risk assessment result:	AMBER: OFFENCE LIKELY	

Image 2 - Natural England's 'Rapid Risk Assessment' of the potential impacts on GCN as a result of the proposed development

6.4.13 The below precautionary working methods will prevent the low risk of harm to occasional roaming GCN which may be foraging within the Site and should be implemented in full during the construction phase of the development:

- Where removal of suitable habitat is required (modified grassland), this should be completed prior to the start of construction works and in a phased/controlled manner, during the active period for newts of late April – October in any given year. To ensure animal welfare is maintained, this clearance work should be completed under the supervision of a suitably experienced/licensed ecologist.
- To ensure building works/materials do not encroach upon areas of retained suitable habitat, a barrier should be constructed using a suitable material such as HERAS fencing (or similar). The barrier should be installed to ensure a sufficient working space is available to complete the project, whilst restricting the likelihood of excessive material storage spreading into adjacent habitats. To ensure the barrier remains in situ throughout the development, regular checks should be made throughout the construction period.
- Any required vegetation/habitat clearance should be preceded by a site briefing, known as a 'toolbox talk', given to all contractors by a suitably experienced/licensed ecologist to explain the potential for GCN, the protection afforded to them, the methodology to be followed and what to do in the unlikely event that a GCN is found during works
 - Management measures should be maintained with vegetation kept at the current height, less than 5cm, to prevent the grassland becoming more suitable for GCN.
 - Vegetation should be cut moving from west to east in order to encourage amphibians to move into the adjacent suitable habitat to the east.
 - Vegetation should be cut to ground-level using hand tools only (petrol trimmers/brush cutters are acceptable).

- Where root removal is required, this should be conducted under the supervision of a suitably experienced/licensed ecologist.
- Should amphibians be encountered at any point during any of the works, works should stop whilst they are relocated out of harms way.
- The development area should be cleared of debris or spoil by hand and under the supervision of a suitably experienced/licensed ecologist in preparation for the required construction.
- All trenches/excavations resulting from the works should be backfilled or covered overnight to prevent herpetofauna/mammals falling into them. If not practical to backfill or cover trenches/excavations, then a suitable means of escape for fauna should be provided (e.g., graded slope/plank installed).
- If left overnight, all trenches/excavations should be checked for the presence of fauna prior to back filling.
- All building materials required for the development should be stored above the ground and on/in pallets or a suitable metal container away from adjacent suitable habitats.

6.4.14 In the highly unlikely event that a GCN is found during the development, all works must **stop** and the appointed ecologist consulted on the appropriate manner in which to proceed.

Reptiles

6.4.15 The longer sward grassland, scrub, log piles and to a lesser extent the hedgerow base, provide suitable foraging and sheltering habitat for reptiles within the Site.

6.4.16 Given the limited extent of the proposals, and limited extent of suitable habitats, further surveys for reptiles are considered disproportionate in this instance. The above precautionary working methods recommended for GCN are considered sufficient to avoid harm or injury to reptiles should they be present.

Nesting Birds

6.4.17 Suitable breeding, nesting and foraging habitat for breeding birds is present within the Site. Further surveys for birds are considered disproportionate due to the limited size of the Site and limited extent of the suitable habitat.

6.4.18 As all nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended) it is recommended that works to these areas (where necessary) are conducted outside the core breeding period for birds of late February – August inclusive.

- 6.4.19 Should this timeframe be unobtainable, a survey for the presence of breeding birds should be conducted by a suitably experienced ecologist immediately prior to the start of works. Should evidence of breeding birds be recorded, works within 5m of the nest, or works that have the suitability to destroy the nest(s), should stop until the eggs have hatched, and the chicks fledged, or the nest is deemed by a suitably experienced ecologist to no longer be active.

Other Species

- 6.4.20 The habitats within the Site have the suitability to support hedgehogs and there are suitable connected habitats within the wider landscape. Therefore, the proposed development should incorporate log/brush piles in appropriate locations on the peripheries of the development.
- 6.4.21 There are no obvious and immediate issues regarding other protected species on the Site and no further surveys to determine the presence of other protected species is required in this instance.
- 6.4.22 Should at any point during the development a protected or notable species be identified within the Site, then all works should **stop** and the appointed ecologist consulted on the appropriate manner in which to proceed.

7 ECOLOGICAL ENHANCEMENTS

7.1 Opportunities to include biodiversity enhancements within the Site exist and, in accordance with the requirements of the NPPF 2024, the following recommendations are considered appropriate for the Site:

- The installation of 2 x bird boxes in suitable locations such as retained trees and/or integrated into any proposed buildings would increase the Site's suitability for nesting birds. Boxes should be selected from either integrated boxes such as those available from www.habibat.co.uk, or open fronted and hole fronted nesting boxes. To maximise suitability, boxes should be installed on sheltered aspects close to vegetation at a height of 2-3m, preferably on north, northeast or northwest facing elevations.
- The installation of 2 x bat boxes installed in suitable locations would increase the Site's suitability for roosting bats. These boxes should be installed at a height of 3m or more or at eaves height on sunny, sheltered aspects, away from direct illumination by artificial lighting and in a location, which ensures connectivity to foraging habitats within the wider landscape. In this instance, boxes such as those provided by www.habibat.co.uk are recommended for within built structures, the Kent Bat box or Schwegler 2FN (or similar) are recommended for any suitable retained trees on the peripheries of the development within retained 'dark corridors'.
- The incorporation of a wildlife-friendly planting scheme within the grounds post-development, including native plant species, would be of benefit to invertebrates, and subsequently birds and bats.
- The incorporation of a hedgehog house would provide enhancement for hedgehogs.
- Any tree planting should be undertaken using native species such as pedunculate oak, small leaved lime *Tilia cordata*, black poplar *Populus nigra*, wild service tree *Sorbus torminalis* or similar.

8 REFERENCES

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The Conservation of Habitats and Species Regulations (Habitats Regulations) 2017.
<http://www.legislation.gov.uk/uksi/2017/1012/made>

Natural Environment and Rural Communities (NERC) Act (2006).
<http://www.legislation.gov.uk/ukpga/2006/16/contents>

The Wildlife and Countryside Act (as amended) 1981. <http://jncc.defra.gov.uk/page-1377>

Figures

Figure 1: UKHab Plan | J25-000175_P2 - Duckyls Farm Centre



Key

Red Line Boundary

Habitats

Horticulture

Modified grassland

Bramble scrub

Bare ground

Buildings

Artificial unvegetated unsealed surface

Native hedgerow with trees

Trees

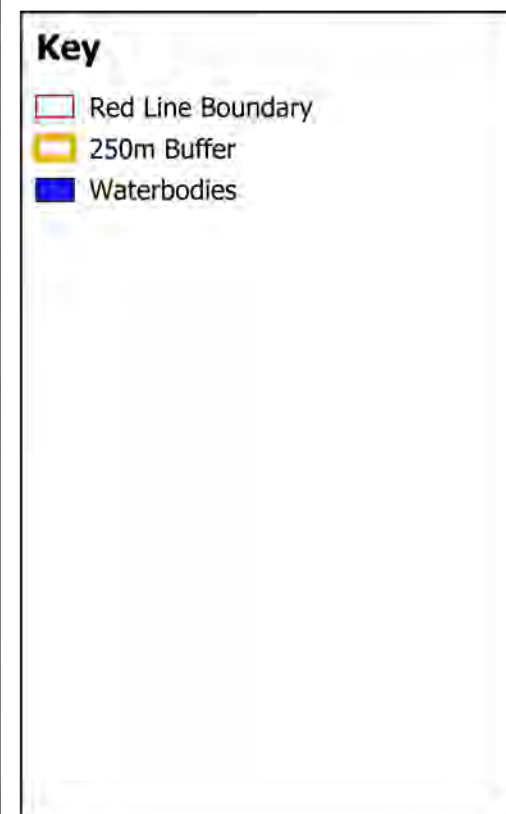
Target notes

Surveyor: Hana Ketley
Survey date: 17.06.2025
Drawn by: HK / LH
Date: 14.07.26
Reference: J25-000175_P2 - Duckyls Farm Centre
Scale: 1:650

Contains Google Imagery ©2024 Bluesky,
Getmapping plc, Infoterra Ltd & Bluesky, Maxar
Technologies, Map data ©2024



Figure 2: Waterbodies within 250m | J25-000175 - Duckyls Farm Centre



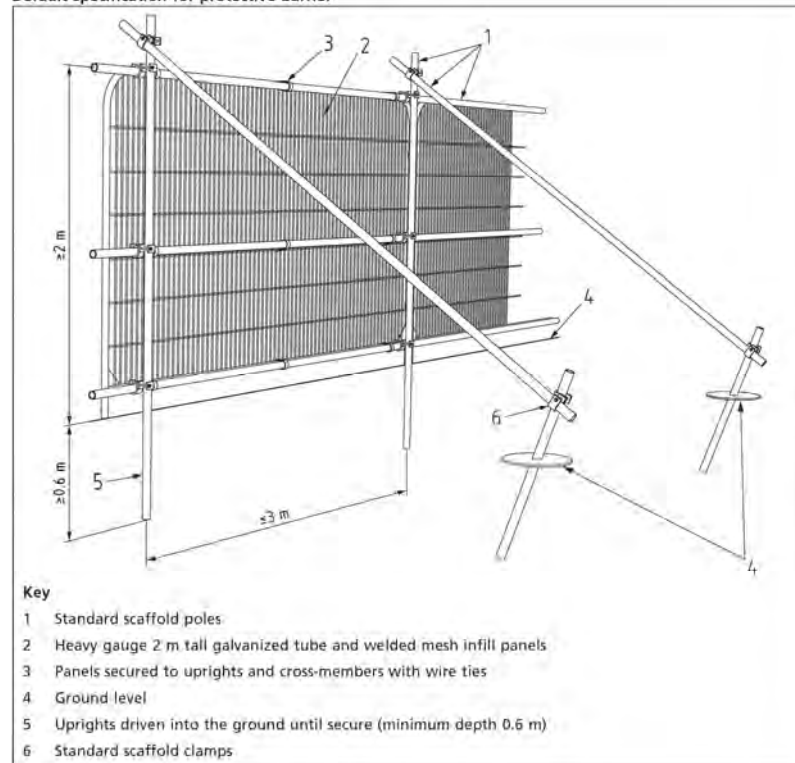
0 25 50 m



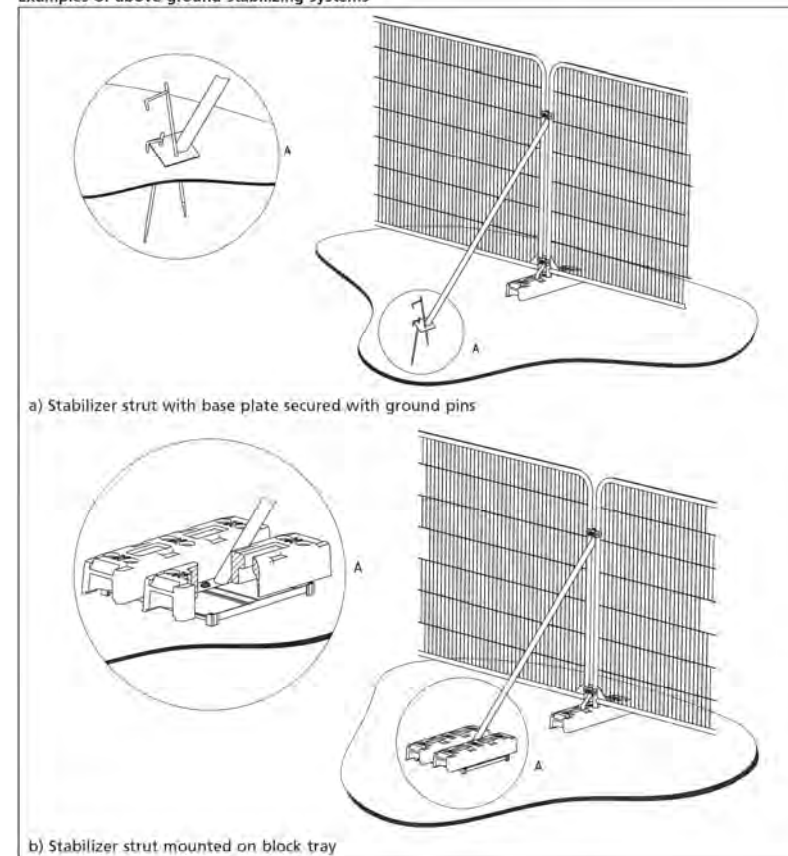
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Survey date: 17.06.2025
Drawn by: HK
Date: 21.07.2025
Reference: J25-000175 - Duckyls Farm Centre
Scale: 1:4,225.307123

Contains Google Imagery ©2024 Bluesky,
Getmapping plc, Infoterra Ltd & Bluesky, Maxar
Technologies, Map data ©2024

Default specification for protective barrier



Examples of above-ground stabilizing systems



Job Reference : J25-000175

Project Title: Duckyls Farm Centre

Drawing Title:
Figure 3- Tree Protection Measures

Date : 24-07-25 Checked : LR

Drawn : LH Approved : N/A

Status : Final Scale : see scale bar

Appendices

APPENDIX A – Site Photographs

	
Photo 1: Short sward modified grassland which forms the majority of the Site	Photo 2: Short sward modified grassland which forms the majority of the Site
	
Photo 3: Longer sward grassland with log piles (TN3)	Photo 4: Longer sward grassland with log piles (TN3)
	
Photo 5: Areas of crop planting	Photo 6: Areas of crop planting

	
Photo 7: Bare ground in front of building B1	Photo 8: Loose earth bund
	
Photo 9: Bramble scrub	Photo 10: Building B1
	
Photo 11: Mature oak tree, T1	Photo 12: Wild plum, T2 and TN2

	
Photo 13: Apple, T3	Photo 14: Apple, T4
	
Photo 15: Artificial unvegetated, unsealed surface, with chalk pile (TN1)	Photo 16: Polytunnel
	
Photo 17: Hedgerow with trees, H1	Photo 18: Ditch D1 (Dry)



Photo 19. Ditch D2 (Running water)



Photo 20. WB2 (Dry)

APPENDIX B – Legislation and Planning Policies

Legislation

- The Conservation of Habitats and Species Regulations 2017 (as amended) transposes European Union Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive) into National law. These regulations provide for the designation and protection of 'European Sites', the protection of 'European Protected Species' and the adaptation of planning controls for the protection of such sites and species. Under the regulations, public bodies have a duty in exercising their functions to have regard to the EC Habitats Directive.
- The Environment Act 2021 operates as the new framework of environmental protection following the United Kingdom's departure from the EU. The Environment Act allows the UK to enshrine some environmental protection into law, and offers new powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction. The Act mandates the creation of Local Nature Recovery Strategies, Protected Site Strategies, Species Conservation Strategies, and the use of conservation covenants to support the design and delivery of strategic approaches to deliver better outcomes for nature. Additional mandates covered by The Act (Part 7) include:
 - A requirement for Biodiversity Net Gain for developments, to ensure all development deliver a minimum of 10% net gains in biodiversity (Section 98).
 - Strengthening of the duty placed on all public bodies to "conserve" and "enhance" biodiversity (Section 102).
 - Duty placed upon Local Authorities to consult prior to felling street trees (Section 115).
- The Wildlife and Countryside Act 1981 (as amended) provides detail on a range of protection and offences relating to wild birds, other animals, and plants. The level of protection depends on which Schedule of the Act the species is listed on. Licences are available for specific purposes to permit actions that would otherwise constitute an offence in relation to species.
- The Countryside Rights of Way Act 2000 provides additional support to the Wildlife and Countryside Act 1981; for example, increasing the level of protection for certain species of reptiles.
- The Natural Environment and Rural Communities (NERC) Act 2006 imposes an obligation on all public bodies, including local authorities, to consider whether their activities can contribute to the protection of wildlife. The duty is created by section 40(1) of the Act, which states that:

“Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.”

- The Hedgerows Regulations 1997 are enforced under the Environment Act 1995, and serves to: restrict the removal of hedgerows, or parts of hedgerows which are over 20m in length. In this case, removal includes digging up and replanting elsewhere, as well as removing from the land completely or destroying in the course of other actions. This includes developments or activities which destroy the roots, causing the vegetation to die.
- The Protection of Badgers Act 1992 exists to protect badgers *Meles meles* from cruelty. Under the act it is a criminal offense to wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so, or to intentionally or recklessly interfere with a sett.
- The Wild Mammal (Protection) Act 1996 protects wild mammal species from certain cruel acts, including kicking, beating, nailing, or otherwise impaling, stabbing, burning, stoning, crushing, drowning, dragging or asphyxiation of any wild mammal with intent to inflict unnecessary suffering. Crushing and asphyxiation are most likely to occur as a result of development proposals, should these works collapse any mammal burrows, or encounter wild mammals on site.

National Planning Policy

- The National Planning Policy Framework (December 2024) states (Section 15) that the planning system should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks; 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. It also states that local planning authorities should refuse planning on the following principles:
 - If significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for.
 - If development is on land within or outside a Site of Special Scientific Interest (SSSI), and is likely to have an adverse effect on it (the exception being where the benefits of the development in the location proposed clearly outweigh its likely impact);
 - If development results in the loss or deterioration of irreplaceable habitats, such as ancient woodland and ancient or veteran trees (unless there are wholly exceptional reasons, and a suitable compensation strategy exists).

Additionally, the NPPF states that 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.

- Species and Habitats of Principal Importance for Conservation in England and Wales and priority habitats and species listed in the Mid Sussex District Council local plan are species which are targeted for conservation. The government has a duty to ensure that involved parties take reasonable practice steps to further the conservation of such species under Section 41 of the Natural Environment and Rural Communities Act 2006. In addition, the Act places a biodiversity duty on public authorities who ‘must, in exercising their functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity’ (Section 40 [1]). Criteria for selection of national priority habitats and species in the UK include international threat and marked national decline.

Local Planning Policy

- Mid Sussex District Council’s District Plan (2014-2031) policy DP38: Biodiversity states that 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.