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Preliminary Ecological Appraisal

Site Name

42 Sea Lane, Ferring

Client

Herbert James Investments
and Acquisitions

Issue Date

5th November 2025

Author

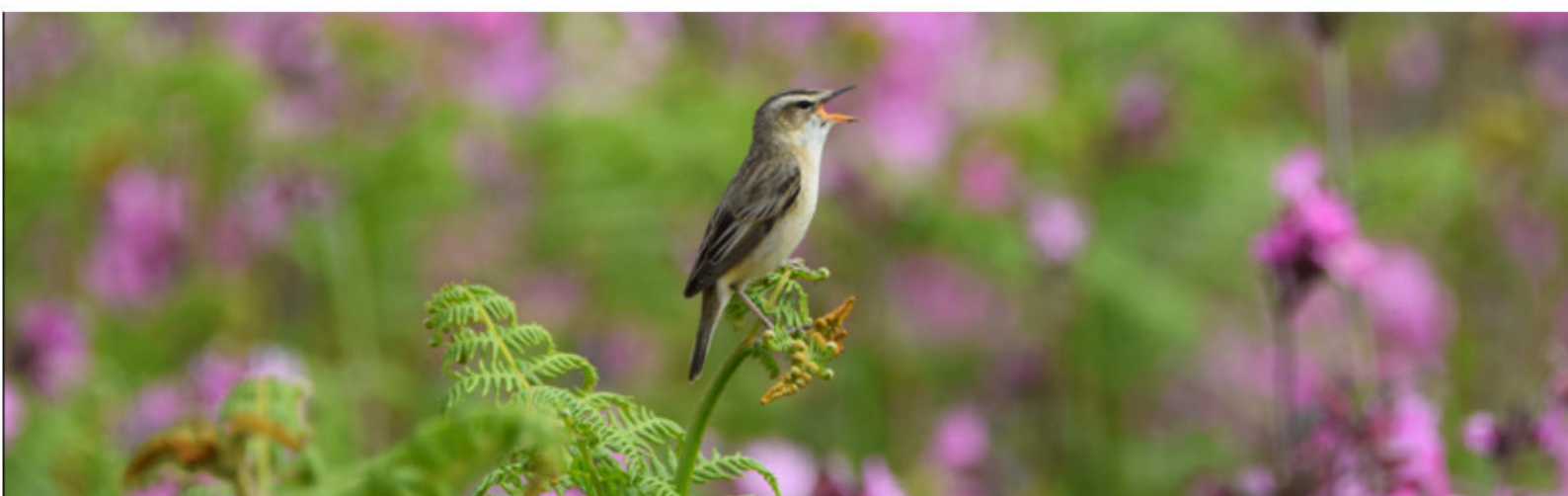
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Document Control

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About the Author

This report has been prepared by Meerabai Kings, a Consultant Ecologist at The Ecology Co-op, with over two years' experience. As a qualifying member of the Chartered Institute for Ecology and Environmental Management (CIEEM) she is bound by their code of professional conduct.

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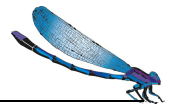


Report Summary

Purpose	The Ecology Co-op was commissioned by Drew Baily at Herbert James Investment and Acquisition to undertake a Preliminary Ecological Appraisal at 42 Sea Lane, Ferring further to a proposal to demolish the existing buildings and construct six new dwellings.
Context	The site measures 0.15ha and is situated in Ferring, West Sussex, west of Worthing. The site currently comprises an unoccupied two-storey building and associated garden, driveway, garage and sheds. The site is situated in an urban edge location, with a residential housing situated to the north, west and south and arable farmland extending to the east. The site is comprised of urban habitats: buildings, garden and hard standing, as well as vegetated borders around the site boundary and some mature trees. The site lies opposite the Goring and Ferring Gap Local Wildlife Site, a non-statutory designated site for nature conservation. This site supports wintering roosts of gulls and waders.
Key findings	The presence of a small number of brown long-eared bat droppings was identified in the eaves void space. The house has a 'moderate' bat roosting potential and the garage has a 'low' bat roosting potential. The vegetated borders on site have the potential to support nesting birds, common reptiles species and hedgehogs, though these are small, isolated habitats of low suitability.
Recommendations	The property was identified to support a moderate suitability for roosting bats, with a very small number of droppings identified. Subsequent emergence surveys and re-inspection of the roof void in 2026 did not however identify either emerging bats, or any fresh droppings and a bat roost was considered likely absent. The garage at 42 Sea Lane has a 'low' bat roosting potential and this building. This was also surveyed in 2026 and no bat emergence was identified. Any vegetation clearance on site must be timed outside of the nesting bird season (avoiding 1st March–31st August). If this is not possible, the borders and trees should be subject to nesting bird checks by a suitably qualified ecologist as appropriate to the works. If an active nest is identified, a minimum exclusion zone for all works within 5m radius of the nest must be established to protect it from disturbance until the young have fledged. Precautionary measures are recommended with regard to reptiles and hedgehogs are set out in Section 4. As the site is adjacent to a Local Wildlife Site, best working practices should be adopted to prevent dust, noise and chemical pollution.
Are further surveys required?	Two bat emergence surveys of the main house and one bat emergence survey of the garage. These were completed in 2026.



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1 INTRODUCTION

1.1 Purpose of the Report

The Ecology Co-op has been commissioned to undertake a Preliminary Ecological Appraisal (PEA) of land at 42 Sea Lane, Ferring by Drew Bailey at Herbert James Investment and Acquisitions. This report presents the findings of a walkover survey undertaken by Meerabai Kings, MSci (hons) and qualifying member of the Chartered Institute for Ecology and Environmental Management (CIEEM); and Joshua Harwood, BSc (hons), Associate member of CIEEM and Natural England Level 1 Bat Survey Class Licence holder, on 9th October 2025. It provides details on the potential for any protected/notable species and/or habitats to be present at the site and a simple assessment of the potential ecological constraints and opportunities in relation to the demolition of the existing property and construction of six new dwellings. Recommendations for further surveys that are likely to be required to inform a planning application and Ecological Impact Assessment (EclA) of the proposal are provided where necessary, and possible measures to avoid, mitigate and/or compensate for significant adverse effects are summarised. The potential to incorporate ecological enhancement measures as part of the scheme is discussed, in addition to any requirement to achieve biodiversity net gain.

This PEA report is designed to inform the client and their team (as appropriate) about the initial findings of the site walkover and desk study research in relation to the site proposals, highlighting the key ecological constraints and opportunities, and any further survey requirements. It is not intended for submission in support of a planning application but can be used to inform a future Ecological Impact Assessment (EclA).

1.2 Background

The site measures 0.15ha and is situated in Ferring, West Sussex, west of Worthing. The site currently comprises an unoccupied two-storey building and associated garden, driveway, garage and sheds. The site is made up of two properties, 42 Sea Lane and part of the adjacent garden of 36 Sea Lane Gardens. The site is situated in an urban edge location, with a residential housing situated to the north, west and south and arable farmland extending to the east. The full address for the site is 42 Sea Lane, Ferring, Worthing, West Sussex BN12 5EH. The central grid reference for the site is TQ 097 023. Figure 1 shows the location of the site.

The proposed development includes demolishing the existing dwelling, sheds and garages and constructing six new dwellings and two new garages. Figure 2 shows the proposed plans for the site.



Figure 1. An aerial image showing the location of the site. The approximate site boundary is outlined in Image produced courtesy of Google maps (map data ©2025 Google)

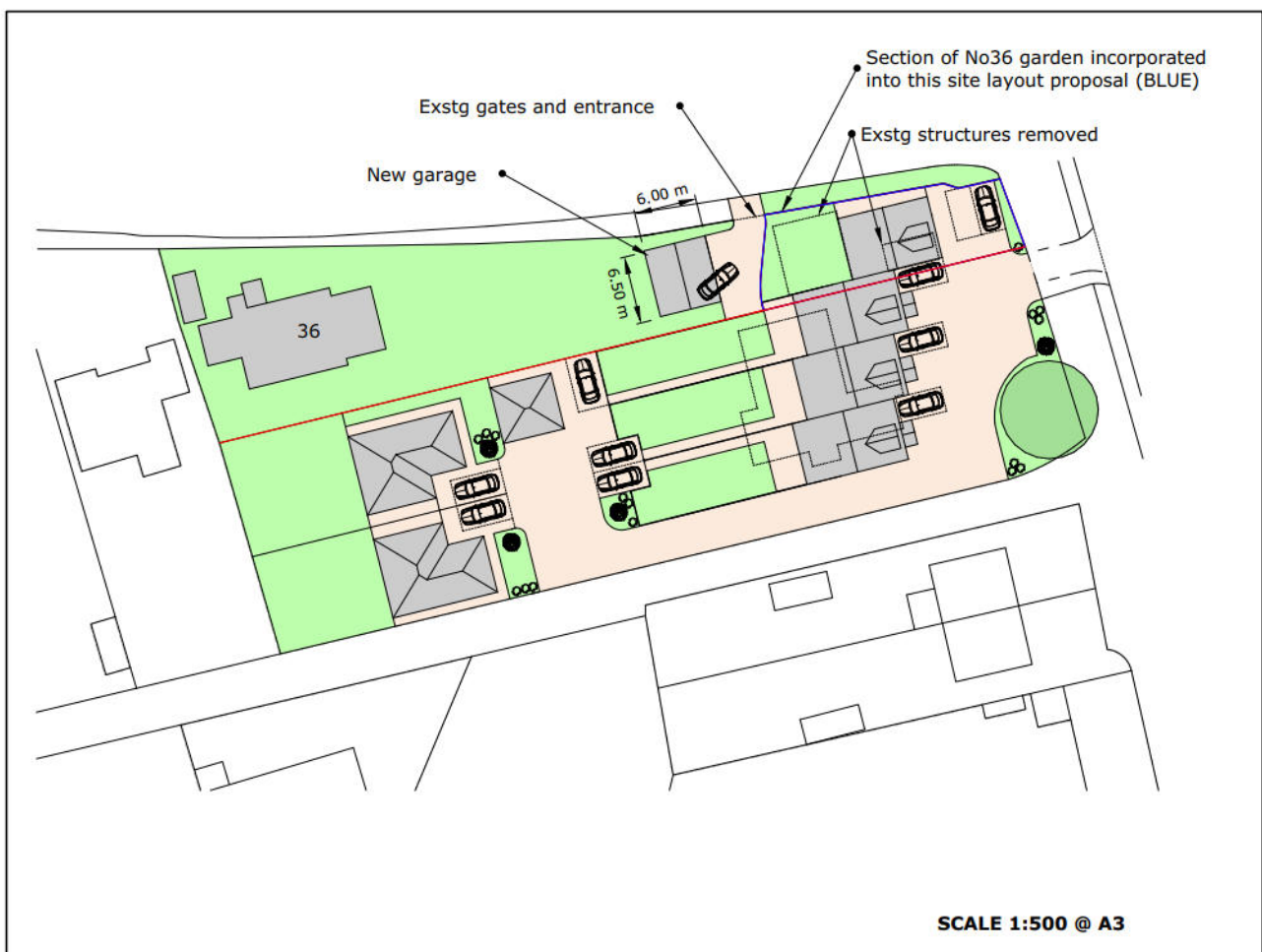


Figure 2. Proposed plans for six new dwellings at 42 Sea Lane. Note the blue line boundary indicates a section of garden at 36 Sea Lane Gardens. Producer, drawing number and date not available.



1.3 Policy and Legislation

Legal protection applying to relevant bird, mammal, herpetofauna, invertebrate species and flora, and current nature conservation planning policy is outlined in Appendix 1 of this report.

Where possible, this report provides guidance on how the proposal can be designed to meet the requirements of both local planning policy and the National Planning Policy Framework (NPPF). Details of the NPPF can be found in Appendix 1 and relevant local planning policy by Arun District Council is provided in Appendix 2.

2 METHODOLOGY

The methodologies used for this survey are in accordance with the Guidelines for Preliminary Ecological Appraisal¹, but also consider the Guidelines for Ecological Report Writing, Second Edition².

2.1 Desk Study

A search for existing records of protected species, species of conservation concern and invasive non-native species was requested from the Sussex Biodiversity Records Centre (SxBRC) within a radius of 1km of the site.

A search of on-line mapping resources was undertaken to identify the location of any features of potential ecological interest including ponds within 500m (relevant to great crested newts *Triturus cristatus*), watercourses (relevant to riparian mammals and crayfish) and connectivity to woodland, scrub, and hedgerow networks (relevant to bats and dormice *Muscardinus avellanarius*) in the wider landscape around the site. The connectivity of the site to these features, buildings and other semi-natural habitats, such as grassland and heathland, are also relevant to great crested newts, reptiles and a wide variety of notable species of conservation concern.

The MAGIC website resource (www.magic.gov.uk) was used to identify the location of designated sites for nature conservation and European Protected Species (EPS) licences granted in relation to the survey site.

2.2 Field Survey

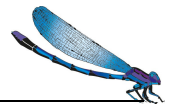
A site walkover survey was undertaken on 9th October 2025, during which the habitats contained within the site were described and evaluated. Comprehensive UKhab mapping of the site was carried out, the results of which are presented in the Biodiversity Impact Calculation report³

Habitats and features at the site were evaluated for their potential to support legally protected species and/or species of conservation interest. In addition, observations of any important plant communities, bird assemblages or other potentially valuable ecological features were recorded.

¹ CIEEM (2017). *Guidelines for Preliminary Ecological Appraisal, 2nd edition*. Chartered Institute of Ecology and Environmental Management, Winchester.

² CIEEM (2017). *Guidelines for Ecological Report Writing, 2nd edition*. Chartered Institute of Ecology and Environmental Management, Winchester.

³ The Ecology Co-op (2025) 42 Sea Lane Biodiversity Impact Calculation



Details of the preliminary survey methods for each legally protected species are given below. Any site-specific limitations to the survey, e.g. access constraints or seasonal constraints, are set out in section 3.11.

2.4 Bats

Bats can use a wide range of features for roosting purposes, including loft spaces, cavity walls, loose tiles, mortice joints and cracks/gaps in a variety of built structures. They can also be found in trees with holes, splits, cracks, cavities, ivy and loose bark.

A detailed building inspection was carried out in accordance with best practice guidance as set out by the Bat Conservation Trust (BCT)⁴; the inspection comprised identification of potential access points and 'Potential Roost Features' (PRFs) that bats could use and any evidence indicating the presence of bats using the building, such as rub marks, feeding remains, staining or droppings. The survey included a ground-based external inspection around the building and internal inspection of four enclosed loft spaces.

A ground level tree assessment (GLTA) of all trees within the site boundary was conducted. All trees were assessed for their suitability to support roosting bats, in accordance with the BCT guidelines. Trees were assessed either as FAR (further assessment required to establish if PRFs are present in the tree.), PRF (a tree with at least one PRF present) or NONE (either no PRFs in the tree or highly unlikely to be any)

The potential for roosting bats for each feature, or group of features was assessed as negligible, low, moderate, or high, in accordance with best practice. Any evidence confirming the presence of bats was clearly recorded including photos and samples taken (e.g. droppings), where appropriate. Further surveys are recommended as appropriate.

The habitats surrounding the site and wider landscape were broadly assessed for their potential to support foraging and commuting bats. Further surveys are recommended as appropriate.

2.5 Breeding Birds

Birds can use a wide range of natural and artificial habitats when breeding, including trees, hedgerows, fields,

⁴ Collins, J.(ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edn). The Bat Conservation Trust, London.



houses and garden sheds. The habitats contained within the site and adjacent areas were broadly assessed for their potential to support important bird species/assemblages, and breeding birds. Any birds identified during the site visit were recorded. Special attention was paid to notable species such as red-listed Birds of Conservation Concern⁵ and those species afforded special protection on Schedule 1 of the Wildlife and Countryside Act (1981). Further surveys are recommended as appropriate.

2.6 Dormice

Dormice are found in deciduous woodland and hedgerows, feeding on flowers, pollen, fruits, insects and nuts, favouring hazel *Corylus avellana* and honeysuckle *Lonicera periclymenum* for food and as bedding. The site was broadly assessed for its potential to support dormice. This included use of on-line mapping resources to assess the surrounding area for connectivity to large blocks of woodland, scrub and extensive hedgerow networks. Further surveys are recommended as appropriate in accordance with best practice guidance⁶.

2.7 Great Crested Newt

Great crested newts breed in ponds during the spring and spend the rest of the year feeding on invertebrates primarily in semi-natural habitats including woodland, hedgerows, marshes and tussocky grassland. A desk study was undertaken to identify ponds and wet ditches within 500m of the site that might support breeding great crested newts. Where access permission was granted, or ponds could be viewed from public roads or footpaths, the ponds were assessed for their potential to support great crested newts using the Habitat Suitability Index (HSI) (Oldham et al 2000)⁷. The value of the site for terrestrially foraging great crested newts and any features that might be used by hibernating newts has also been assessed.

Further surveys are recommended as appropriate, in accordance with best practice guidance (English Nature 2001)⁸.

2.8 Reptiles

The common lizard *Zootoca vivipara*, slow-worm *Anguis fragilis*, grass snake *Natrix helvetica* and adder *Vipera berus* are widespread species that can be found in any of these habitats, whereas smooth snake *Coronella austriaca* and sand lizard *Lacerta agilis* have much more restricted and isolated populations on lowland heathland and sand dunes.

Habitats on the site were broadly assessed for their potential to support reptiles. Particular attention was paid to those features that provide suitable basking areas (e.g. south-facing slopes), hibernation sites (e.g. banks, walls, piles of rotting vegetation) and opportunities for foraging (rough grassland and scrub). Further surveys are

⁵ Stanbury, A., Eaton, M., Aebischer, N., Balmer, N., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. (2021). Birds of Conservation Concern 5: the status of bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man. *British Birds* 114, pp 723-747.

⁶ Bright, P., Morris, P. and Mitchell-Jones, T. (2006). *The dormouse conservation handbook 2nd Ed.* English Nature, Peterborough.

⁷ Oldham, R.S., Keeble, J., Swan, M.J.S. and Jeffcote, M. (2000). Evaluating the suitability of habitat for the great crested newt (*Triturus cristatus*). *Herpetological Journal* 10, 143-155.

⁸ English Nature (2001). *Great Crested Newt Mitigation Guidelines.* English Nature, Peterborough.



recommended as appropriate.

2.9 Other Notable Species

The site's habitats were broadly assessed for their potential to support species of principal importance for nature conservation (Section 41 NERC Act 2006) and other notable species. This includes mammals such as harvest mouse *Micromys minutus*, hedgehog *Erinaceus europaeus*, brown hare *Lepus europaeus*, and many bird species. The site was broadly assessed for its potential to support important invertebrate assemblages with particular attention paid to features such as standing dead-wood, wet flushes, bare earth banks and botanically rich areas.

3 BASELINE CONDITIONS

3.1 Designated Sites and Granted EPS Licences

There are no statutory designated sites within the zone of influence of the site.

There are two Local Wildlife Sites (LWSs) within 1km of the site: Ferring Rife and Meadows, and Goring and Ferring Gap (Table 1). Goring and Ferring Gap supports important roost sites for wintering gulls and waders.

Table 1 Designated sites within 1km of 42 Sea Lane

Site name	Designation	Features listed on citation	Proximity
Non-statutory designated sites			
Goring and Ferring Gap	LWS	The site is dominated by arable fields but also contains scattered trees, woodland, amenity grassland and unmanaged grassland. Additional habitats include a heavily shaded pond in the centre of the site and hedgerows in the east of the site. The site is important for passage and wintering birds. The fields in the southwest of the site provide important roost sites for gulls and waders. Much of the site's eastern border is comprised of broadleaved planation woodland, dominated by holm oak <i>Quercus ilex</i> and sycamore <i>Acer pseudoplatanus</i>. The understorey is dominated by elder <i>Sambucus nigra</i> and hawthorn <i>Crataegus monogyna</i>. Areas of the site are accessible to the public.	0.1km east Goring and Ferring gap is situated opposite the site, on the eastern side of Sea Lane.
Ferring Rife and Meadows	LWS	Ferring Rife and Meadows is comprised of a wide channel between banks of neutral grassland. There are several shallow pools within the site. The grassland supports the rare Carthusian snail <i>Monacha cartusiana</i> and many butterfly species such as small copper <i>Lycaena phlaeas</i>, common blue <i>Polyommatus icarus</i>, orange-tip <i>Anthocharis cardamines</i>, green-veined white <i>Pieris napi</i>, ringlet	0.6km west



		<i>Aphantopus hyperantus</i> and wall brown <i>Lasiommata megera</i> . Common darter dragonflies <i>Sympetrum striolatum</i> have been recorded in high numbers by the Rife.	
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The closest priority habitat for nature conservation to the site is a parcel of deciduous woodland, 95m northeast of the site (Figure 3).

There is one granted EPS licence for mitigation projects within 1km of the site boundary. The closest EPS licence to the site concerns bats (2020-48782-EPS-MIT). This licence permits the destruction of a brown long-eared bat *Plecotus auritus* and common pipistrelle *Pipistrellus pipistrellus* roost, dated 03/09/2020 to 31/10/2026. The licence is located 580m west of the site (Figure 4).

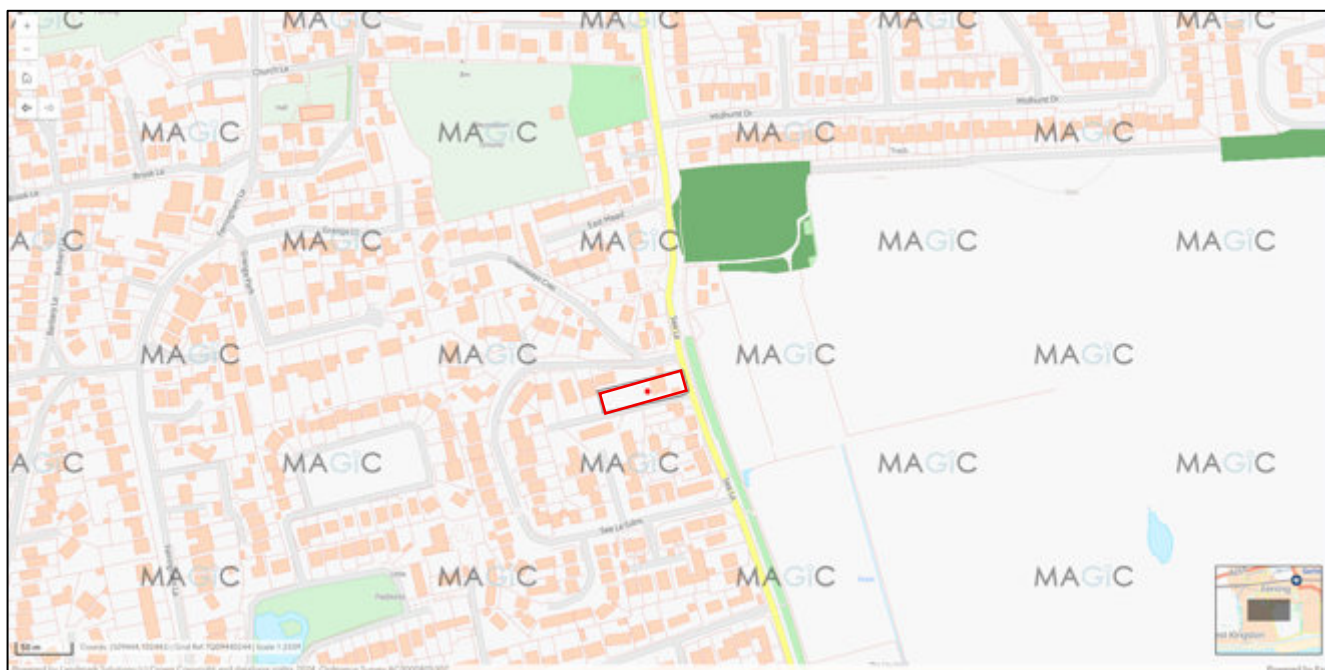


Figure 3 Habitats of importance for nature conservation nearby the site (outlined in red). Image produced courtesy of Magic maps (<http://www.magic.gov.uk/>, contains public sector information licensed under the Open Government Licence v3.0).



Figure 4. Granted EPS licences within 1km of the application site (outlined in red). Image produced courtesy of Magic maps (<http://www.magic.gov.uk/>), contains public sector information licensed under the Open Government Licence v3.0).

3.2 Habitats

Photographs of the site are shown in Appendix 4.

The site is wholly comprised of urban habitats: garden u1 828, buildings u1b5 and developed land-sealed surface u1b (Photograph 1, Photograph 2).

The garden is comprised of mown lawn, ornamental shrub species, trees and patio (Photograph 3). The lawn is dominated by perennial rye *Lolium perenne*, fescue *Festuca sp.* and cocksfoot *Dactylis glomerata*, with abundant daisy *Bellis perennis* and ribwort plantain *Plantago lanceolata*.

Within the garden are apple *Malus domestica* and pear *Pyrus communis* trees (Photograph 4). Other trees on site include ornamental species as well as one sycamore *Acer pseudoplatanus* (Photograph 1), one eucalyptus *Eucalyptus spp.* (Photograph 5), one silver birch *Betula pendula* (Photograph 6), one palm *Palmera spp.* (Photograph 3), one lawson cypress *Chamaecyparis lawsoniana*, one walnut *Juglans regia* (Photograph 7) and one beech *Fagus sylvatica* (Photograph 8).

Much of the garden is bordered by ornamental vegetation, comprised of species such as garden rose *Rosa spp.*, ivy *Hedera helix*, pampas grass *Cortaderia selloana* and thorny olive *Elaeagnus pungens*, the latter being the dominant species (Photograph 9). There are also some hawthorn *Crataegus monogyna* shrubs.

Three buildings are present on site, the main dwelling and one garage (Photograph 10), as well as a carport at the neighbouring property, 36 Sea Lane Gardens (Photograph 11).

The garden of 36 Sea Lane Gardens contains one holm oak tree *Quercus ilex*, mown lawn and ornamental shrubs including pampas grass.



3.4 Bats

The SxBRC biodiversity records search indicates the presence of *Pipistrellus* species, *Myotis* species and unidentified *Chiroptera* species within 1km of the site (Table 2).

Table 3 shows the results of the building and structure inspections and site photographs are shown in Appendix 4.

Table 2 Bat Records within 1km of 42 Sea Lane

Species	Number of Records
Common pipistrelle <i>Pipistrellus pipistrellus</i>	7
<i>Pipistrellus</i> species	1
Daubenton's bat <i>Myotis daubentonii</i>	1
Whiskered bat <i>Myotis mystacinus</i>	1
Whiskered/Brandt's bat <i>Myotis brandtii</i>	1
Bat species <i>Chiroptera</i>	3

Table 3. Potential roost features for bats.

Building section	Description of features	Assessment of suitability
Main house - exterior	Two storey brick build with clay tiled roof and well-sealed plastic soffits (Photograph 1, Photograph 12.) One gap on southern face between brick work and soffit box, heavily cobwebbed (Photograph 13). Several gaps under roof tiles across all faces of the building. Most of these look to be shallow gaps on the south-facing roof pitch, though there are three gaps between the mortar and ridge tiles on the south-facing pitch (Photograph 14, Photograph 15). The porch on the southern elevation of the building has two PRFs under two lifted tiles (Photograph 16). On the western face of the building there are two shallow gaps in the mortar and a deeper gap at the ridge line (Photograph 17). Hanging tiles on dormer window (western elevation) offer potential	Moderate bat roost suitability



Building section	Description of features	Assessment of suitability
	roosting opportunities (Photograph 18). The west-facing roof pitch has several lifted and missing tiles (Photograph 19). Whilst gaps are present on the ground-floor roof on the western elevation, the gutter obstructs these, making access for bats more difficult (Photograph 19). The northern elevation is overall very intact and free from PRFs but there is one gap beneath a ridge tile (Photograph 20, Photograph 21). Lead flashing around Velux windows and soffits are all free from gaps. There are several lifted tiles on the east-facing pitch of the roof and three gaps in the mortar at the roof's ridge (Photograph 22). Lead flashing around Velux windows and soffits are all free from gaps. No evidence of bats was found on the building's exterior.	
Main house - Void 1	Eaves storage at northwestern corner of house measuring 2m long by 1m wide by 1.5m high. Boarded, heavily insulated and heavily cobwebbed (Photograph 23). No obvious roost features. No visible daylight gaps and no evidence of bats.	Negligible bat roost suitability
Main house - Void 2	Eaves storage at southwestern corner of house 2m long by 2m wide by 2m high. Boarded and very well sealed (Photograph 24). No obvious roost features. No visible daylight gaps and no evidence of bats.	Negligible bat roost suitability
Main house - Void 3	T-shaped eaves storage along eastern side of the house measuring approximately 2m high by 10m long by 1m wide (2m wide at its southern point) Warm void, with several daylight gaps visible and gaps in the insulation, exposing tiles throughout the void (Photograph 25). Some areas heavily cobwebbed (Photograph 26, Photograph 27). Less than 5 droppings were seen in Void 3 (Photograph 28). Subsequent DNA analysis confirmed them to be brown long-eared bat <i>Plecotus auritus</i> droppings (Appendix 4).	Moderate bat roost suitability and confirmed brown long-eared droppings
Main house - Void 4	Roof void at the top of the property measuring 10m long by 2m wide by 1m high. No felt lining, meaning majority of the tiles are exposed and the void is drafty (Photograph 29, Photograph 30). Potential roosting opportunities behind loose, peeling boards but these were drafty and no daylight gaps seen. No visible daylight gaps, heavily cobwebbed ridge, no evidence of bats in Void 4.	Low bat roost suitability
Garage	Brick built single storey building with clay tiled roof. Roof tiles intact	Low bat roost suitability



Building section	Description of features	Assessment of suitability
	and appear well-sealed (Photograph 10, Photograph 31). Internal access not possible but interior looks dark. Interior suitability assumed to be 'low' given lack of access.	suitability
Car port	Wooden structure with slate roof (Photograph 11) and open western side, making it exposed. Roof is well sealed with white roofing felt (Photograph 32) and no lifted slates present. Wooden cladding is well sealed with no lifted areas. Whilst there are gaps at the eaves, these lead straight into the building and are not PRFs (Photograph 33). No PRFs or evidence of bats.	Negligible bat roost suitability
Potting shed	Well lit, wooden shed (Photograph 34). No PRFs or evidence of bats.	None
Playhouse	Well lit, wooden shed with wooden cladding (Photograph 35). No PRFs or evidence of bats.	Negligible bat roost suitability
Shed	Wooden shed with exposed northern face (Photograph 36, Photograph 37). No PRFs or evidence of bats.	None

Overall, the main house at 42 Sea Lane has a 'moderate' suitability to support roosting bats and is a confirmed brown long-eared bat roost. The garage has a 'low' suitability and the remaining outhouses have a 'negligible' suitability.

Following the GLTA of all the trees on site, all trees were assessed as 'NONE', having either no PRFs in the tree or highly unlikely to be any. Tree-roosting bats are therefore not considered a constraint to the development at 42 Sea Lane.

As the site is comprised of urban habitats, the site overall has a 'low' foraging potential for bats, limited to the vegetated borders. A small number of common bat species may utilise the site for foraging and commuting.

3.5 Breeding and Wintering Birds

The vegetated borders and occasional mature trees have the potential to support a variety of common nesting birds.

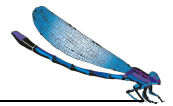
Whilst the nearby Goring and Ferring Gap LWS supports wintering gulls and waders, none of the habitats on site are suitable to support these species.

The SxBRC biodiversity records search indicates the presence of 258 bird species within 1km of the site, including starling *Sturnus vulgaris*, house sparrow *Passer domesticus*, herring gull *Larus argentus* and curlew *Numenius Arquata*.

3.6 Dormice

The site contains no woodland, scrub or hedgerows suitable for dormice and the species is highly unlikely to be present. No further consideration of this species is required.

The SxBRC identified no dormouse records in the search area.



3.7 Great Crested Newts and other Amphibians

There are three ponds and one ditch within 500m of the site (Figure 5). Given that the site is comprised of urban habitats, it is highly unlikely that great crested newts and other amphibians will use the site for foraging or breeding. Consequently, the four waterbodies within 500m of the site were not assessed. No further consideration of amphibian species is required.

The SxBRC biodiversity records search indicates the presence of smooth newt *Lissotriton vulgaris*, palmate newt *Lissotriton helveticus*, common frog *Rana temporaria*, common toad *Bufo bufo* and great crested newt within 1km of the site. The closest great crested newt record is 620m southwest of the site, dated 2009.

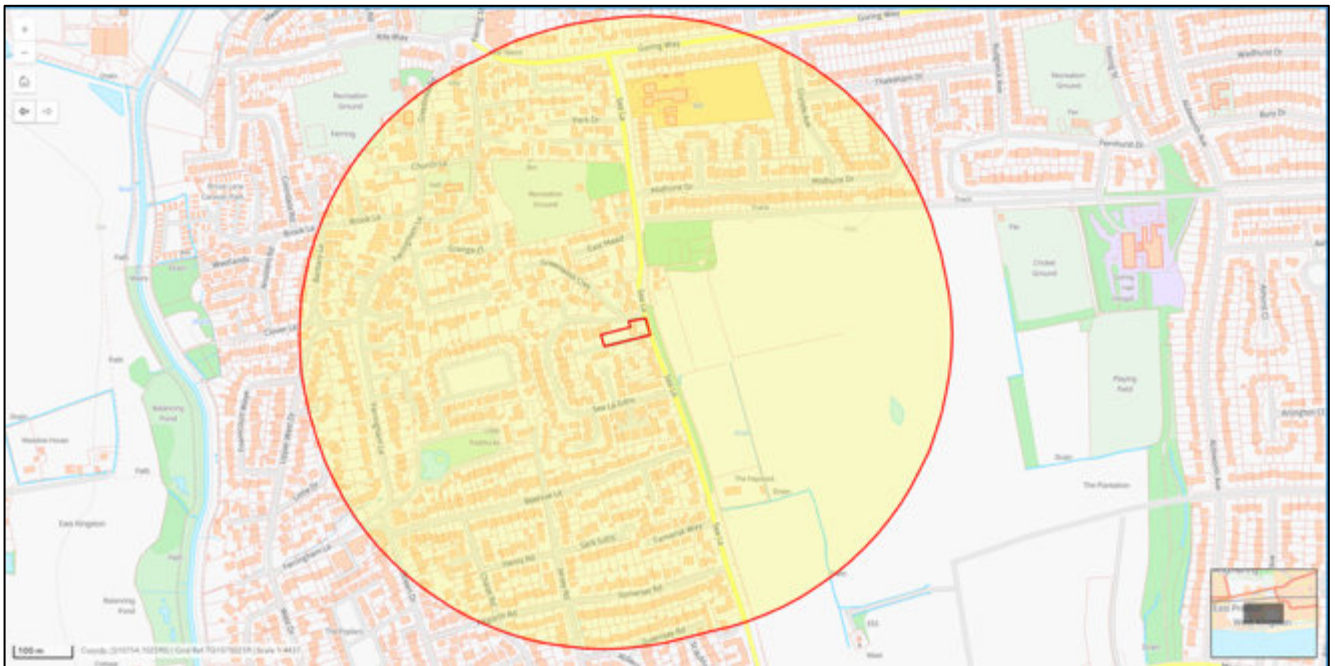


Figure 5. Ponds and ditches (shaded blue) within 500m of the site (outlined in red). Image produced courtesy of Magic maps (<http://www.magic.gov.uk/>, contains public sector information licensed under the Open Government Licence v3.0).

3.8 Reptiles

Whilst the site exclusively contains urban habitats and close-mown amenity grassland, the vegetated borders around the site offer low suitability to reptile species. These areas are surrounded by urban habitats and mown lawn, both of which offer no suitability to reptiles. The vegetated borders are poorly connected to areas of suitable habitat, making them isolated resources that could potentially support small numbers of common reptile species such as slow worm *Anguis fragilis* and their presence on site cannot be ruled out.

The SxBRC biodiversity records search indicates the presence of slow worm and common lizard *Zootoca vivipara* within 1km of the site.

3.9 Invasive Non-native Species

No evidence of invasive non-native species was found during the walkover survey.



The SxBRC biodiversity records search indicates the presence of Himalayan balsam *Impatiens glandulifera* and wall cotoneaster *Cotoneaster horizontalis* within 1km of the site.

3.10 Other Notable Species

The vegetated borders of the site could provide some habitat for a small number of hedgehogs.

3.11 Survey Limitations

An initial site assessment such as this is only able to act like a 'snapshot' to record any flora or fauna that is present at the time of the survey. It is therefore possible that some species may not have been present during the survey, but may be evident at other times of the year. For this reason, habitats are assessed for their potential to support some species, even where no direct evidence (such as droppings) has been found.

Access into the garage was not possible as the garage was locked and no key was available. An internal inspection of the garage was therefore not possible, and as such its bat roost suitability is assessed as 'low', with the need for one emergence survey. If access to the garage was possible, the bat roost suitability has the potential to be 'negligible' but at this stage, it cannot be deemed as such.

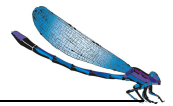
4 IMPACT APPRAISAL

4.1 Designated Sites

The proposed demolition and redevelopment at 42 Sea Lane is small in scale and considered to be low in impact. However, due to the site's close proximity to Goring and Ferring Gap LWS, where possible, works should be timed outside of the winter period (November-February inclusive) to avoid disturbance to overwintering birds at the LWS.

The following best working practices must be adopted during the works:

- dust suppression measures such as dampening will be implemented through the use of hoses and sprinklers when there is a risk of elevated dust levels and a risk of deposition onto the adjacent habitats;
- no burning of vegetation or waste materials on site to ensure ash and other particulate matter does not settle within adjacent habitats;
- immediately switching off machinery when not in use, not leaving to idle, as this will result in unnecessary noise and air pollution;
- handling and placing materials with care to reduce noise and vibration;
- using drip trays and spill kits to avoid contaminants leaching into the soil;
- directing surface water run off to the nearest wastewater drain and away from the adjacent habitats, using bunding where necessary;
- storing all materials and vehicles within the development boundary; and,
- ensuring no oil, bitumen, diesel or cement are mixed or discharged, onto the adjacent habitats.



Whilst the development at 42 Sea Lane will increase the number of residents in the area, six houses is a small-scale development that is unlikely to significantly increase recreational pressure or disturbance to wintering birds within Goring and Ferring Gap LWS or Ferring Rife and Meadows LWS.

Therefore, in relation to designated sites, the proposed development is considered to pose a 'negligible' impact risk.

4.2 Habitats

Priority habitats are not a constraint to the development.

The short-mown modified grassland and artificial surface that make up the majority of the site hold little to no value for protected species.

The vegetated borders on site are the most ecologically valuable and, therefore, should be retained or enhanced with native trees and shrubs where possible. Recommended species for planting include:

- blackthorn *Prunus spinosa*;
- hawthorn;
- dogwood *Cornus sanguinea*;
- purging buckthorn *Rhamnus cathartica*;
- wayfaring-tree *Viburnum lantana*;
- wild privet *Ligustrum vulgare*;
- dog rose *Rosa canina*; and
- field maple *Acer campestre*.

4.3 Bats

In accordance with the Bat Conservation Trust guidelines, the main house has potential to support further roosting bats rated as moderate. The works to demolish the property would therefore risk the destruction of a bat roost.

In accordance with the guidelines two bat emergence/re-entry surveys were required to determine the importance of this building to bats as without further surveys the level of impact upon bats cannot be fully assessed.

Tree-roosting bats are not considered a constraint to the development at 42 Sea Lane.

As the site may be used by foraging and commuting bats, it is important that the potential for disturbance from artificial lights is considered. The proposed development is likely to require an 'ecologically sensitive lighting scheme' in accordance with guidance produced by the Bat Conservation Trust (summarised in Appendix 3).

In 2026 further bat emergence surveys were carried out by the Ecology Co-op, which confirmed the likely absence of bats in both buildings. These surveys [These surveys are presented in a separate report produced by the](#)



[Ecology Co-op⁹](#). As a repeat inspection of the roof voids did not identify any fresh bat droppings since the November 2025 assessment, it is considered highly unlikely that an active bat roost is present.

4.4 Breeding and Wintering Birds

The vegetated borders on site have the potential to support common nesting birds. Any vegetation clearance of the vegetated borders on site could disturb or injure breeding birds.

Therefore, any vegetation clearance on site must be timed outside of the nesting bird season (avoiding 1st March–31st August). If this is not possible, the borders and trees should be subject to nesting bird checks by a suitably qualified ecologist as appropriate to the works. If an active nest is identified, a minimum exclusion zone for all works within 5m radius of the nest must be established to protect it from disturbance until the young have fledged.

Whilst the nearby Goring and Ferring Gap LWS supports wintering roosts of gulls and waders, these assemblages are not of international or national importance. The development is small in scale will not significantly increase recreational pressure or disturbance to wintering birds within Goring and Ferring Gap. The best working practices outlined in section 4.1 will ensure disturbance and pollution during construction is kept to a minimum.

4.5 Reptiles

The site contains a small, isolated area of suitable reptile habitat within its vegetated borders.

The vegetated borders around the site should be retained where possible. However, if these areas are to be removed, the proposed development would result in the loss of a small area of potentially suitable common reptile habitat.

Due to the small area of the habitat, and its low potential, no further surveys have been recommended for reptiles. Instead, a precautionary approach is considered appropriate in this instance. This will involve the following:

- prior to any other works commencing, of fingertip search of all vegetated borders within the development's impact zone must occur by a suitably qualified ecologist. In the event any reptile is found, it must be relocated outside of the development zone;
- the removal of the borders will then be subject to a two-phase strim approach, supervised by an experienced Ecological Clerk of Works (ECoW). The first strim would reduce the vegetation to 15cm in height to encourage any reptiles to move out of the area. A second strim would reduce the height to 5cm which would render the habitat unsuitable;
- the development zone must then be maintained as cut short until works commence, to ensure that herptiles are not encouraged to move into the development zone;
- any foundation digging or removal of topsoil must occur under the supervision of an experienced ECoW, who will ensure in the unlikely event that any reptiles are found during digging that they are safely translocated outside of the construction zone

⁹ 42 Sea Lane, Ferring, Bat Emergence Survey – The Ecology Co-op 2026)



4.6 Other Notable Species

The hedgehog has suffered dramatic declines in population in recent decades¹⁰ although it remains fairly widespread. The vegetated borders have the potential to be used by this species for foraging, commuting and shelter. No further surveys are recommended as at present there are no set survey guidelines for hedgehogs. The precautionary measures outlined in section 4.6 will ensure no hedgehogs are harmed or injured during vegetation removal on site. Any hedgehogs found will be gently moved to safety in a suitable area of habitat nearby, and outside of the construction zone.

5 CONCLUSIONS

The demolition of the existing dwelling will result in the destruction of a confirmed brown long-eared bat roost and a European Protected Species Licence is required for the works to legally proceed. To inform this licence and roost characterisation, two bat emergence surveys must be conducted between May and August, as the dwelling has a 'moderate' bat roosting potential. Furthermore, the garage at 42 Sea Lane has a 'low' bat roosting potential and this building will need one emergence survey to be conducted between May and August.

The land at 42 Sea Lane supports urban habitats such as buildings, garden and hardstanding, as well as vegetated borders around the site boundary. These vegetated borders have the potential to support common nesting bird species, a small number of common reptile species and hedgehogs. Due to the small scale of the development, precautionary measures and reasonable avoidance measures with respect to these species are considered appropriate in this instance, as outlined in sections 4.4 and 4.5 of this report.

It is important that no habitat clearance or other site preparation work should be undertaken until planning permission has been granted and all relevant protections for habitats of importance and protected species have been detailed and implemented. Please be advised that any work to remove or modify habitats outside of typical management may undermine a future planning application.

Should you need any further advice on the information provided above, please do not hesitate to contact The Ecology Co-op, [REDACTED]

¹⁰ British Wildlife (December 2016) Britain's Hedgehogs: research and the conservation effort in the face of serious decline. British wildlife Vol. 28, pp78-86)



APPENDIX 1 – Wildlife Legislation and National Planning Policy

Introduction

The following text is intended for general guidance only and does not constitute comprehensive professional legal advice. It provides a summary of the current legal protection afforded to wildlife in general and certain species. It includes current national planning policy relevant to nature conservation.

The ‘Birds Directive’, ‘Habitats Directive’ and ‘Natura 2000 Sites’

The Council Directive 79/409/EEC on the Conservation of Wild Birds (“the Birds Directive”) sets a framework for the protection of wild birds. Under the Directive, several provisions are made including the designation and protection of ‘Special Protection Areas’ (SPAs) – areas which support important bird populations, and the legal protection of rare or vulnerable species.

The Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the “Habitats Directive”) directs member states of the EU to take measures to maintain the favourable conservation status of important habitats and species. This requires the designation of a series of sites which contain important populations of species listed on Annex II of the Directive (for example Bechstein’s bat *Myotis bechsteinii*, Barbastelle bat *Barbastella barbastellus* and white-clawed crayfish *Austropotamobius pallipes*). Together with ‘Special Areas of Conservation’ (SACs), SPAs form a network across Europe of protected areas known as the ‘Natura 2000 sites’.

Annex IV lists species in need of more strict protection, these are known as “European Protected Species (EPS)”. All bat species, common dormice *Muscardinus avellana*, otter *Lutra lutra* and great crested newts *Triturus cristatus* are examples of EPS that are regularly encountered during development projects.

The ‘Habitats Regulations’

The Conservation of Habitats and Species Regulations 2017, as amended (the “Habitats Regulations”) is the principle means of transposing the Habitats Directive and the Birds Directive, and updates the Conservation (Natural Habitats, &c.) Regulations 1994 (“the 1994 regulations”) in England and Wales.

‘Natura 2000’ sites, now known as National Site Network sites under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, receive the highest level of protection under the Regulations which requires that any activity within the zone of influence of these sites would be subject to a Habitats Regulations Assessment (HRA) by the competent authority (e.g. planning authority), leading to an Appropriate Assessment (AA) in cases where ‘likely significant effects’ to the conservation objectives are identified.

For European Protected Species, Regulation 41 makes it a criminal offence to:

- deliberately capture, injure or kill any such animal;
- deliberately disturb wild animals of such species;
- deliberately take or destroy their eggs (where relevant);
- damage or destroy a *breeding or resting place* of such an animal;
- possess, control, sell or exchange any live or dead animal or plant, of such species;
- deliberately pick, collect, cut, uproot or destroy a wild plant of such species.

The Habitats Directive and Habitats Regulations provide for the derogation from these prohibitions for specific



reasons provided certain conditions are met. An EPS licensing regime allows operations that would otherwise be unlawful acts to be carried out lawfully. Natural England is the licensing Authority and, in order to grant a license, ensures that three statutory conditions (sometimes referred to as the 'three derogation tests') are met:

- a licence can be granted for the purposes of "preserving public health or safety or for other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment" (Regulation 53 (2) (e);
- a licence can be granted if "there are no satisfactory alternatives" to the proposed action;
- a licence shall not be granted unless the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.

Wildlife and Countryside Act (1981) as amended.

This remains one of the most important pieces of wildlife legislation in the UK. There are various schedules to the Act protecting birds (Schedule 1), other animals including insects (Schedule 5), plants (Schedule 8), and control of invasive non-native species (Schedule 9).

Under the Wildlife and Countryside Act (WCA) 1981, all wild birds (with the exception of those listed on Schedule 2), their eggs and nests are protected by law and it is an offence to:

- take, damage or destroy the nest of any wild bird while it is in use or being built
- take or destroy the egg of any wild bird
- disturb any bird listed on Schedule 1, while it is nest building, or at a nest with eggs or young, or disturb the dependant young of any such bird.

Schedule 5 lists all non-avian animals receiving protection to a varied degree. At its strongest, the Act makes it an offence to intentionally kill, injure or take any wild animal listed on Schedule 5, and prohibits interference with places used for shelter or protection, or intentionally disturb animals while occupying such places. Examples of species with *full protection* include all EPS, common reptile species, water vole *Arvicola amphibius*, white-clawed crayfish *Austropotamobius pallipes* and Roman snail *Helix pomatia*. Other species are protected from sale, barter or exchange only, such as white letter hairstreak *Satyrion w-album*.

The Act makes it an offence to intentionally pick, uproot or destroy any plant or seed, and sell or possess any plant listed on Schedule 8. It is also an offence to intentionally uproot any wild plant not listed on Schedule 8 unless authorised [by the land owner]. Species on Schedules 5 and 8 are reviewed every 5 years when species can be added or removed.

Measures for the prevention of spreading non-native species which may be detrimental to native wildlife is included in the Act, which prohibits the release of animals or planting of plants into the wild of species listed on Schedule 9 (for example, Japanese knotweed *Fallopia japonica*, Himalayan balsam *Impatiens glandifera*, New Zealand Pygmyweed *Crassula helmsii*).

The Wildlife and Countryside Act 1981 (as amended) also prohibits certain inhumane methods of traps and devices for the capture or killing of wild animals and certain additional methods such as fixed trap, poisoning with gas or smoke, or spot-lighting with vehicles for killing species listed on Schedule 6 of the Act (this includes all bat species, badger, otter, polecat, dormice, hedgehog and red squirrel).

Natural Environment and Rural Communities (NERC) Act (2006)

The NERC Act (2006) created the statutory nature conservation body Natural England, and places a statutory



duty on all public bodies, including planning authorities, under Section 40, to take, or promote the taking by others, steps to further the conservation of *habitats and species of principal importance for the conservation of biodiversity* in England (commonly referred to as the ‘Biodiversity Duty’). This duty extends to all public bodies the biodiversity duty of Section 74 of the Countryside and Rights of Way (CROW) Act 2000, which placed a duty only on Government and Ministers. Section 41 of the NERC Act lists the habitats and species of principle importance. This includes a wide range of species from mosses, vascular plants, invertebrates through to mammals and birds. It originates from the priority species listed under the UK Biodiversity Action Plan (UK BAP) with some omissions and additions.

Environment Act (2021)

The Environment Act sets a target of halting the decline in species through the inclusion of a legally binding 2030 species abundance target. Aiming to restore natural habitats and enhance biodiversity, the Act requires new developments to improve or create habitats for nature (through mechanisms such as mandatory Biodiversity Net Gain), and tackle deforestation. Going forwards, UK businesses will need to look closely at their supply chains as amongst other measures they will be prohibited from using commodities associated with wide-scale deforestation. Woodland protection measures are also strengthened through the Act.

The Act enables the reform of the Habitats Regulations and further improves protection for nature through the establishment of Local Nature Recovery Strategies that support national Nature Recovery Networks. In addition, the Act provides for the production of Protected Site Strategies and Species Conservation Strategies, aimed at supporting the design and delivery of strategic approaches to deliver better outcomes for nature.

Protection of Badgers Act (1992)

The badger *Meles meles* is afforded specific legal protection in Britain under the Protection of Badgers Act (1992), and Schedule 6 of the Wildlife and Countryside Act 1981 (as amended) (see above).

Under this legislation, it is a criminal offence to:

- intentionally kill, injure, take, possess, or cruelly ill-treat, a badger, or to attempt to do so;
- interfere with a sett, by damaging or destroying it;
- to obstruct access to, or any entrance of, a badger sett; or
- to disturb a badger when it is occupying a sett.

A licence may be obtained from Natural England to permit certain prohibited actions for a number of defined reasons including interference of a sett for the purpose of development, provided that a certain number of conditions are met. Note that licenses are not normally granted for works affecting badgers between the end of November and the start of July.

National Planning Policy Framework

The National Planning Policy Framework (NPPF 2024)¹¹ sets out the Government’s view on how planners should balance nature conservation with development and helps ensure that Government meets its biodiversity commitments with regard to the operation of the planning system.

Paragraph 192b, states that council plans should “*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue*

¹¹ HM Government (2024). National Planning Policy Framework. Department for Communities and Local Government. Available online at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf



opportunities for securing measurable net gains for biodiversity.”

The Office of the Deputy Prime Minister (ODPM) Circular 06/2005, 2005)¹². In accordance with the NPPF, it is important that developments should contribute to and enhance the natural and local environment by:

- minimising impacts on existing biodiversity and habitats;
- providing net gains in biodiversity and habitats, wherever possible;
- establishing coherent ecological networks that are more resilient to current and future pressures.

UK Post-2010 Biodiversity Framework

The UK Biodiversity Action Plan (UK BAP), first published in 1994, was the UK's response to the commitments of the Rio Convention on Biological Diversity (1992) until 2010, when the UK BAP was replaced by the UK Post-2010 Biodiversity Framework. This framework covers the period 2011 to 2020 and forms the UK government's response to the new strategic plan of the United Nations Convention on Biodiversity (CBD) published in 2010. This promotes a focus on individual countries delivering target for protection for biodiversity through their own strategies.

The most recent biodiversity strategy for England, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' was published by Defra (2011), and a progress update was provided in July 2013 (Defra 2013).

'Biodiversity 2020' builds on the Natural Environment White Paper for England – 'The Natural Choice', published on 7 June 2011, and sets out the strategic direction for biodiversity policy for the next decade.

Biodiversity 2020 deliberately avoids setting specific targets and actions for local areas and species because the Government believes that local people and organisations are best placed to decide how to implement the strategy in the most appropriate way for their local area or situation.

Birds of Conservation Concern (BoCC)

In 1996, the UK's leading non-governmental bird conservation organisations listed the conservation status of all bird species in the UK against a series of criteria relating to their population size, trends and relative importance to global conservation. The lists, known as the 'Red', 'Amber' and 'Green' lists (in order of decreasing concern) are used to inform key conservation policy and decisions. The lists are reviewed every five years and are a useful reference for determining the current importance of a particular site for birds. The most recent review was undertaken in 2021 (Stanbury et al, 2021), which provides an up to date assessment of the conservation status of birds in the UK.

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¹² HM Government (2005) ODPM Circular 06/05 Government Circular: *Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System*. Available online at:
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APPENDIX 2 – Arun District Council – Adoption Arun Local Plan 2011-2031

Table 1. Environmental/ecological policies set out in the Arun Local Plan 2011-2031.

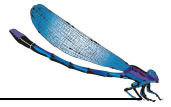
Policy Number/Title	Policy Summary
C SP1- Countryside	Outside the Built-Up Area Boundaries (as identified on the Policies Maps) land will be defined as countryside and will be recognised for its intrinsic character and beauty. Development will be permitted in the countryside where it is: a. for the operational needs of agriculture, horticulture, forestry, the extraction of minerals or the management of waste as part of a waste site allocation within the West Sussex Waste Local Plan; or b. for quiet, informal recreation; or c. for green infrastructure; or d. for the diversification of the rural economy; or e. for road and/or cycle schemes; or f. in accordance with other policies in the Plan which refer to a specific use or type of development. 7 Settlement Structure & Green Infrastructure The Council will take into account cumulative impact of development in the consideration of planning applications. To ensure better management of the rural-urban fringe in those areas where significant new development is proposed, early consideration will need to be given to landscape and biodiversity enhancement, woodland management, recreation provision and access routes.
ENV SP1 - Natural Environment	Arun District Council will encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environment through the development process and particularly through policies for the protection of both designated and non-designated sites. Where possible it shall also promote the creation of new areas for habitats and species. In relation to designated sites, development will be permitted where it protects sites listed in Tables 17.1-17.7 that are recognised for the species and habitats contained within them.
ENV DM1 - Designated Sites of Biodiversity or Geological Importance	a. Proposed development likely to have an adverse effect on land with the designated features of any Site of Biodiversity or Geological Importance as listed in Tables 17.1 - 17.7 or any subsequently designated sites (either individually or in combination with other developments), will not normally be permitted. Consideration will be given to the exact designated features present on the site, their scarcity/rarity and recognition of the protection offered by their existing status. Development on wildlife sites with the highest value will only be permitted exceptionally where the following can be demonstrated: - There is no alternative solution (which shall be adequately demonstrated by the developer). - There are reasons of public health or public safety or - There are benefits of primary importance to the environment or - There are imperative reasons of overriding public interest. Notwithstanding the above however, the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined. b. In determining any planning application affecting Sites of Biodiversity or Geological Importance the Council will ensure that the intrinsic natural features of particular interest are safeguarded or enhanced having regard to;



Policy Number/Title	Policy Summary
	i. The European, National or Local status and designation of the site; ii. The nature and quality of the site's features, including its rarity value; iii. The extent of any adverse impacts on the notified features of interest; iv. The need for compensatory measures in order to re-create remaining features of habitats on or off the site. c. Where appropriate the Council will ensure the effective management of designated sites through the imposition of planning conditions or Section 106 agreements as appropriate.
ENV DM3 - Biodiversity Opportunity Areas	Development shall: a. Retain and sympathetically incorporate locally valued and important habitats, including wildlife corridors and stepping stones b. Be designed in order to minimise disturbance to habitats Development proposals that do not reasonably address opportunities for enhancing these through their design, layout and landscaping or access/management shall not be permitted. Where a development scheme would result in a habitat loss, mitigation measures will be proposed as part of the proposed scheme and such measures agreed with the Local Planning Authority prior to the determination of any planning application. Within Biodiversity Opportunity Areas (BOAs) identified on the Policies Maps or where likely to have an impact on species or habitats within the BOAs, any application for planning permission shall include a properly conducted survey of the presence of that species and habitat and impact(s) that development may have on the BOA.
ENV DM4 - Protection of Trees	Development will be permitted where it can be demonstrated that trees protected by a Tree Preservation Order(s), (TPO) identified as Ancient Woodland, in a Conservation Area or contributing to local amenity, will not be damaged or destroyed now and as they reach maturity, unless development: a. Would result in the removal of one or more trees in the interests of good arboricultural practice. This shall be demonstrated by the developer following the advice of a suitably qualified person which shall be guided by BS 5837 (2012). Details of any advice received having regard to BS 5837 (2012) shall be submitted, in writing, as part of a planning application; or b. Would enhance the survival and growth prospects of other protected trees; c. The benefits of the proposed development in a particular location outweigh the loss of trees or woodland, especially ancient woodland. Where planning permission is granted in any of the above instances, conditions shall be used to ensure that, for any trees which are removed as part of a development, at least an equivalent number of a similar species and age (where practical) are planted on the proposed development site. Sufficient space for replacement trees to mature without causing future nuisance or damage shall be provided. The planting of new trees shall form an integral part of the design of any development scheme. Proper provision must be made for the protection and management of trees or areas of woodland on-site when undertaking development. A management plan shall be provided as part of a planning application in accordance with BS 5837 (2012) in order to ensure that trees are adequately protected during development and appropriately maintained in the future. Conditions for the continued protection of trees on sites shall be included in any planning permission given. Where there are existing trees on or adjacent to a development site, developers shall be required to provide: d. Land and tree surveys e. A tree constraints plan f. An arboricultural impact assessment to include a tree protection plan and arboricultural



Policy Number/Title	Policy Summary
	method statement These will ensure that development is planned to take a comprehensive view of tree issues at an early stage in the design process and that development works do not have a negative impact on existing trees.
ENV DM5 - Development and Biodiversity	Development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site. They shall also however incorporate elements of biodiversity including green walls, roofs, bat and bird boxes as well as landscape features minimising adverse impacts on existing habitats (whether designated or not). Development schemes shall also be appropriately designed to facilitate the emergence of new habitats through the creation of links between habitat areas and open spaces. Together, these provide a network of green spaces which serve to reconnect isolated sites and facilitate species movement. Where there is evidence of a protected species on a proposed development site, planning applications shall include a detailed survey of the subject species, with details of measures to be incorporated into the development scheme to avoid loss of the species. This involves consideration of any impacts that will affect the species directly or indirectly, whether within the application site or in an area outside of the site, which may be indirectly affected by the proposals. All surveys shall be carried out at an appropriate time of year and shall be undertaken by a qualified and, where appropriate, suitably licensed person. All developments shall have regard to Natural England's standing advice for protected species.
W SP1 - Water	Arun District Council will encourage water efficiency measures in order to protect the District's water resources and enhance the quality of the water environment which supports a range of habitats and ecosystems. Development will be encouraged to make active use of surface water as a design feature and permitted where it identifies measures to improve and enhance waterbodies, coastal habitats or provides additional flood relief. The Council will also support development that: a) is appropriately located, taking account of flood risk and promotes the incorporation of appropriate mitigation measures into new development, particularly Sustainable Drainage Systems that reduces the creation and flow of surface water and improves water quality; 63 Water stressed areas - final classification (July 2013) b) reduces the risk to homes and places of work from flooding whilst increasing biodiversity; c. delivers a range of community benefits including enhancing the quality of life and providing greater resistance to the impact of climate change.



APPENDIX 3– Site Photographs



Photograph 1 The garden and house at 42 Sea Lane. Rear of the property facing east. Sycamore shown in the background



Photograph 2 Driveway to the front of the property is a sealed surface



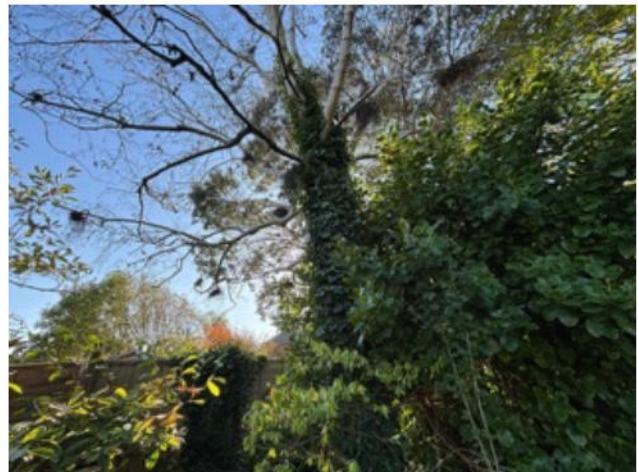
Photograph 3 Patio to the rear of the property, facing south. Palm and sycamore tree shown.



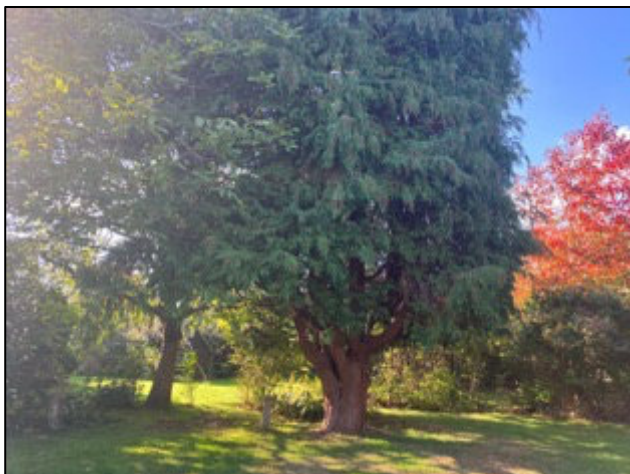
Photograph 4 Apple and pear trees in the rear garden



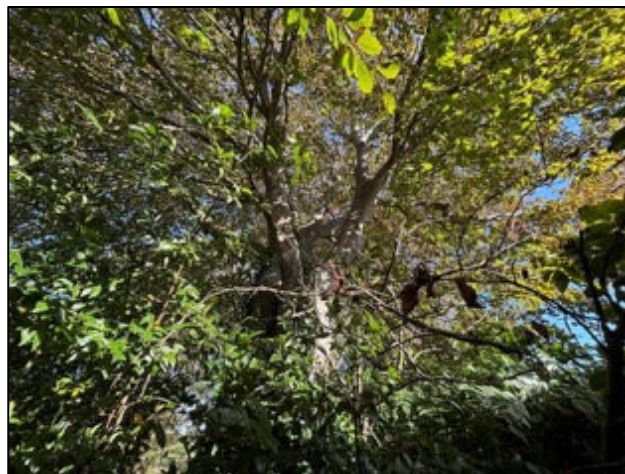
Photograph 5 Eucalyptus tree



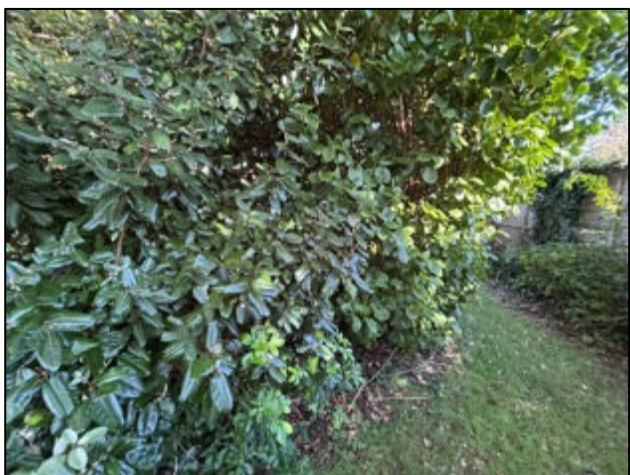
Photograph 6 Silver birch tree



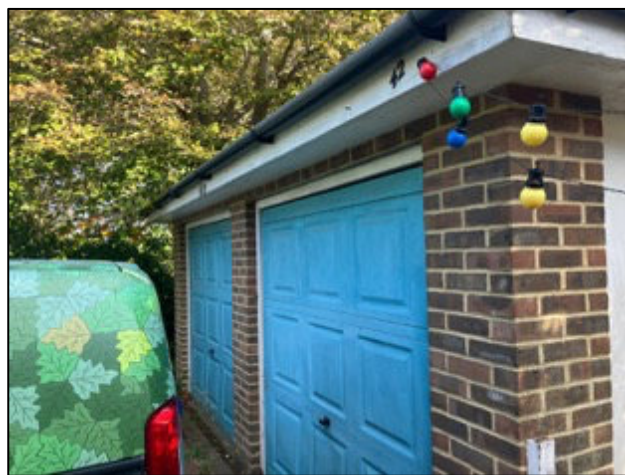
Photograph 7 Cypress (right) and walnut tree (right)



Photograph 8 Beech tree in front garden



Photograph 9 Ornamental shrub borders are dominated by thorny olive.



Photograph 10 Garage at 42 Sea Lane



Photograph 11 Car port and holm oak at 36 Sea Lane Gardens



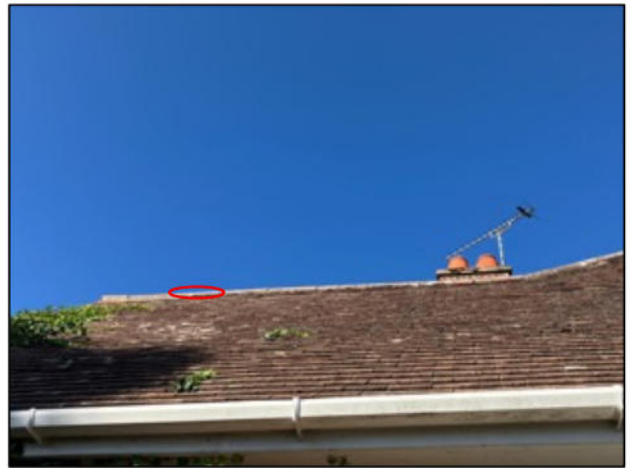
Photograph 12 Southeastern corner of the property



Photograph 13 Heavily cobwebbed gap between the brick work and soffit box on the southern elevation of the house



Photograph 14 PRFs at the ridge of the south-facing roof pitch



Photograph 15 Gap in the mortar on the southern elevation of the house (circled) as well as several lifted tiles



Photograph 16 PRFs on and surrounding the west-facing pitch of the porch (porch located on the house's southern elevation)



Photograph 17 Gaps in the mortar on the house's western elevation



Photograph 18 Hanging tiles on the west-facing dormer window



Photograph 19 hanging tiles on the west-facing dormer window and missing/lifted tiles on the west-facing roof pitch. Note the guttering blocking access to any gaps along the edge of the ground-floor roof.



Photograph 20 the northern face of the house is well sealed and intact



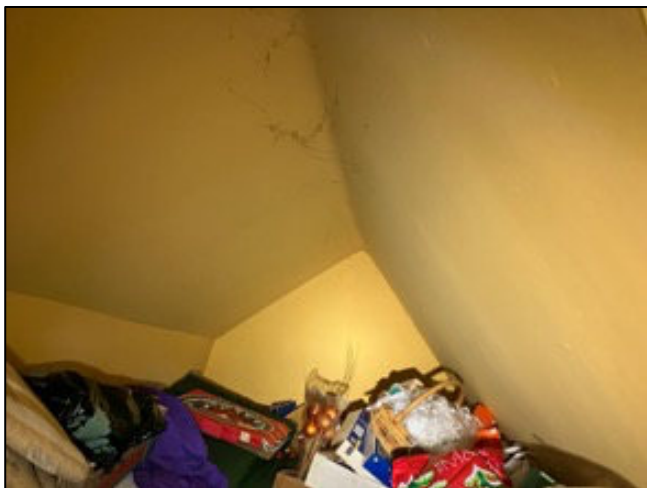
Photograph 21 gap beneath a ridge tile on the northern elevation



Photograph 22 PRFs on the east-facing roof pitch



Photograph 23 Void 1 in the main house



Photograph 24 Void 2 in the main house



Photograph 25 Void 3 in the main house, note the exposed roof tiles



Photograph 26 Cobwebs in Void 3



Photograph 27 loft void 3



Photograph 28 brown long-eared bat droppings found in Void 3



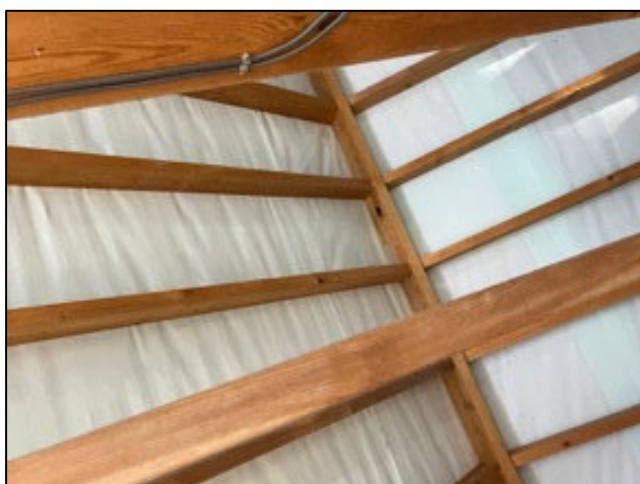
Photograph 29 Exposed tiles and cobwebs in Void 4



Photograph 30 Peeling boards in Void 4



Photograph 31 southern view of the garage at 42 Sea Lane



Photograph 32 well-sealed roof inside the carport



Photograph 33 gaps at the eaves of the carport leading into the structure. the wooden cladding is very well sealed and free from gaps



Photograph 34 potting shed is well lit by the windows



Photograph 35 wooden playhouse is well lit by windows



Photograph 36 shed (exterior)



Photograph 37 shed (interior)



APPENDIX 4 – DNA Analysis Results



Results

Sample ID: EG-2748-1

Sample information:

Sample type: Faecal

Species group: Bats

Suspected species:

Site Location: BN12 5EQ

Comments:

Laboratory information:

DNA Extraction Code: EG-2025-2545

Identification method: qPCR

Analysis Procedure Notes:

All UK bat species tested for - only a single species detected in this sample.

Laboratory Comments:

None

Species Identified:

Species 1: Plecotus auritus (Brown long-eared bat)

qPCR Ct Value: 24

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APPENDIX 5 – Reducing Impacts of Artificial Light

Bright external lighting can have a detrimental impact upon foraging and commuting bat flight paths, but more importantly can also cause bats to remain in their roosts for longer. Artificial lighting can also cause significant impacts to other nocturnal species, most notably moths and other nocturnal insects. It can also result in disruption of the circadian rhythms of birds, reducing their fitness.

Guidelines issued by the Bat Conservation Trust¹³ should be referred to when designing the lighting scheme. Note that lighting designs in very sensitive areas should be created with consultation from an ecologist and using up-to-date bat activity data where possible. The guidance contains techniques that can be used on all sites, whether a small domestic project or larger mixed-use, commercial or infrastructure development. This includes the following measures:

Avoid lighting key habitats and features altogether

There is no legal duty requiring any place to be lit. British Standards and other policy documents allow for deviation from their own guidance where there are significant ecological/environmental reasons for doing so. It is acknowledged that in certain situations lighting is critical in maintaining safety, such as some industrial sites with 24-hour operation; however, in the public realm, while lighting can increase the perception of safety and security, measurable benefits can be subjective. Consequently, lighting design should be flexible and be able to fully consider the presence of protected species.

Apply mitigation methods to reduce lighting to agreed limits in other sensitive locations – lighting design considerations

Where bat habitats and features are considered to be of lower importance or sensitivity to illumination, the need to provide lighting may outweigh the needs of bats. Consequently, a balance between a reduced lighting level appropriate to the ecological importance of each feature and species, and the lighting objectives for that area will need to be achieved. The following are techniques which have been successfully used on projects and are often used in combination for best results:

- dark buffers, illuminance limits and zonation;
- sensitive site configuration, whereby the location, orientation and height of newly built structures and hard standing can have a considerable impact on light spill;
- consideration of the design of the light and fittings, whereby the spread of light is minimised ensuring that only the task area is lit. Flat cut-off lanterns or accessories should be used to shield or direct light to where it is required. Consideration should be given to the height of lighting columns. It should be noted that a lower mounting height is not always better. A lower mounting height can create more light-spill or require more columns. Column height should be carefully considered to balance task and mitigation measures. Consider no lighting solutions where possible such as white lining, good signage, and LED cat's eyes. For example, light only high-risk stretches of roads, such as crossings and junctions, allowing headlights to provide any necessary illumination at other times;
- screening, whereby light spill can be successfully screened through soft landscaping and the installation of walls, fences and bunding;
- glazing treatments, whereby glazing should be restricted or redesigned wherever the ecologist and lighting professional determine there is a likely significant effect upon key bat habitat and features;

¹³ Bat Conservation Trust and Institute for Lighting Professionals (2018) Guidance note 8. Bats and Artificial Lighting. <https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>



- creation of alternative valuable bat habitat on site, whereby additional or alternative bat flightpaths, commuting habitat or foraging habitat could result in appropriate compensation for any such habitat being lost to the development;
- dimming and part-night lighting. Depending on the pattern of bat activity across the key features identified on site it may be appropriate for an element of on-site lighting to be controlled either diurnally, seasonally or according to human activity. A control management system can be used to dim (typically to 25% or less) or turn off groups of lights when not in use.

Demonstrate compliance with illuminance limits and buffers

- *Design and pre-planning phase*; it may be necessary to demonstrate that the proposed lighting will comply with any agreed light-limitation or screening measures set as a result of your ecologist's recommendations and evaluation. This is especially likely to be requested if planning permission is required.
- *Baseline and post-completion light monitoring surveys*; baseline, pre-development lighting surveys may be useful where existing on or off-site lighting is suspected to be acting on key habitats and features and so may prevent the agreed or modelled illuminance limits being achieved.
- *Post-construction/operational phase compliance-checking*; as a condition of planning, post-completion lighting surveys by a suitably qualified person should be undertaken and a report produced for the local planning authority to confirm compliance. Any form of non-compliance must be clearly reported, and remedial measures outlined. Ongoing monitoring may be necessary, especially for systems with automated lighting/dimming or physical screening solutions.

Lighting Fixture Specifications

The Bat Conservation Trust recommends the following specifications for lighting on developments to prevent disturbance:

- lighting spectra: peak wavelength >550nm
- colour temperature: <2700k (warm)
- reduction in light intensity
- minimal UV emitted
- upward light ratio of 0% and good optical control.

Further reading:

Buglife (2011) A review of the impact of artificial light on invertebrates.

Royal Commission on Environmental Pollution (2009) Artificial light in the environment. HMSO, London.
Available at: <https://www.gov.uk/government/publications/artificial-light-in-the-environment>

Rich, C., Longcore, T., Eds. (2005) Ecological Consequences of Artificial Night Lighting. Island Press. ISBN 9781559631297.

CPRE (2014) Shedding Light: A survey of local authority approaches to lighting in England. Available at: <http://www.cpre.org.uk/resources/countryside/dark-skies/item/3608-shedding-light>



Planning Practice Guidance guidance (2014) When is light pollution relevant to planning? Available at: <https://www.gov.uk/guidance/light-pollution>

Institution of Lighting Professionals (2021) Guidance Notes for the Reduction of Obtrusive Light GN01:2011. Available at: <https://www.theilp.org.uk/resources/free-resources/>

Voigt, C.C., Azam, C., Dekker, J., Ferguson, J., Fritze, M., Gazaryan, S., Hölker, F., Jones, G., Leader, N., Lewanzik, D. and Limpens, H., 2018. *Guidelines for consideration of bats in lighting projects*. Unep/Eurobats. Available at: https://cdn.bats.org.uk/uploads/pdf/Resources/EUROBATGuidelines8_lightpollution.pdf?v=1542109376

End.
