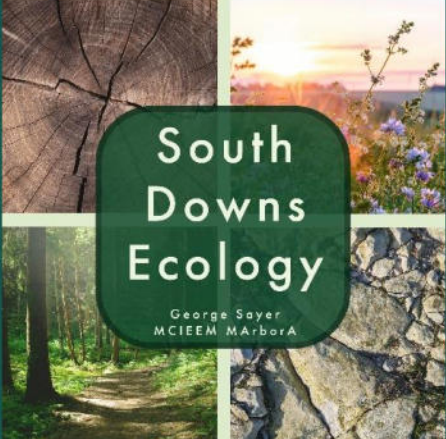


Ecological Impact
Assessment

Wicks Farm, Ford Lane,
Ford



South
Downs
Ecology

George Sayer
MCIEEM Member

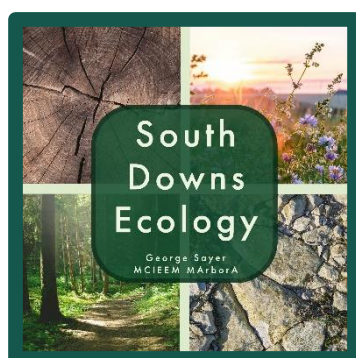
Ecological Impact Assessment

Quality Assurance:

Document reference	GS552.WicksFarm.EclA.v2
Site	Wicks farm, Ford Lane, Ford
Client	Mr D. Moore
Author	Alex Rosenfeld Assistant Ecologist
Reviewer	George Sayer BSc(Hons) PgDip MCIEEM MArborA Level 2 Bat Licence Principal Ecologist and Director
Report issue date	24/04/2026
Report conditions	The methods and recommendations in this report are based on the following: CIEEM Guidelines for Ecological Report Writing 2017 (CIEEM, 2017) CIEEM Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2024) Surveys have been carried out following the guidance sources set out in CIEEM's Good Practice Guidance for Habitats and Species (CIEEM, 2021), which include: CIEEM Guidelines for Preliminary Ecological Appraisal, Second Edition (CIEEM, 2017) CIEEM Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. Second Edition (CIEEM, 2017) Bat Conservation Trust (BCT) Bat Surveys for Professional Ecologists: Good Practice Guidelines (BCT, 2023)

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Summary

Mr D. Moore has commissioned a Preliminary Ecological Appraisal (PEA) and Ecological Impact Assessment (EclA) of Wicks Farm, Ford Lane, Ford (Grid reference: SU99380407). The proposals include the renewal of the existing temporary permission for workers' accommodation.

A Preliminary Ecological Appraisal (PEA) was carried out on 6th November 2025 by George Sayer (BSc (Hons), PgDip, MArborA, MCIEEM, NE Licence Holder – Bats Level 2 and GCN – Ecologist).

The site consists of mobile homes with a toilet / shower building, amenity block, parking and refuse area. Access to the site is along a track with grassland surrounding it.

The proposals are not anticipated to have any significant impact upon any designated sites or protected species due to proposals only encompassing the renewal of permission with no changes to habitats planned. There is potential for protected and notable species within the site but impacts would be negligible. The proposals do not seek to alter habitats and as such are exempt from mandatory Biodiversity Net Gain.

When mitigation and enhancements have been taken into account, the proposals are not considered to have a negative impact upon habitats or protected species in accordance with planning policy. Some basic further enhancements could be enacted to achieve a further gain. The proposals would therefore accord with the relevant local and national planning policies and the relevant legislation.

1.0 Introduction

- 1.1 Mr D. Moore has commissioned a Preliminary Ecological Appraisal (PEA) and Ecological Impact Assessment (EcIA) of Wicks farm, Ford Lane, Ford. The proposals include renewal of the existing temporary permission for workers' accommodation.
- 1.2 A Preliminary Ecological Appraisal (PEA) was carried out on 6th November 2025 by George Sayer (BSc (Hons), PgDip, MArborA, MCIEEM, NE Licence Holder – Bats Level 2 and GCN – Ecologist). The report is an update to works undertaken by The Ecology Partnership in 2021 with reporting provided in 2023.
- 1.3 The following EcIA report has been completed by Alex Rosenfeld, Assistant Ecologist, and reviewed by George Sayer. The purpose of the assessment has been to identify whether any potential impacts upon protected species, habitats or designated sites might have occurred or might occur through continued use, and to propose mitigation or avoidance measures where necessary.
- 1.4 Based on the results of the appraisal, recommendations for potential ecological enhancements have been provided.

Site Description and Surrounding Area

- 1.5 The site consists of mobile homes with a toilet / shower building, amenity block, parking and refuse area. Access to the site is along a track with grassland surrounding it.
- 1.6 The site is bound by commercial units and plant nursery to the north, arable and vacant land to the east, broadleaved woodland to the west and a hedgerow with trees to the south.
- 1.7 The site lies in the village of Ford. Ford airfield lies 0.7km south and the village of Wick lies 2.0km east.

Proposals

- 1.8 The proposals include renewal of the existing temporary permission for workers' accommodation.

2.0 Scope of Assessment

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

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

3.0 Planning Policy and Legislation

National Planning Policy

- 3.1 The National Planning Policy Framework (NPPF) 2024 sets out the government planning policies for England and how they should be applied. 'Chapter 15: Conserving and Enhancing the Natural Environment' states that development should be 'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'
- 3.2 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

Local Planning Policy

- 3.3 The site is within the Arun District; the proposals should be assessed against the Arun District Local Plan 2011-2031. Local Planning Policy relevant to this site include Policies ENV SP1 (*Biodiversity*), W SP1 (*Flooding and Drainage*), ENV DM1 (*Designated Sites of Biodiversity and Geological Importance*), ENV DM3 (*Biodiversity Opportunity Areas*), ENV DM4 (*Protection of Trees*), ENV DM5 (*Development and Biodiversity*) AND GI SP1 (*Green Infrastructure and development*) of the Arun Local Plan 2011 – 2031 (adopted 2018).
- 3.1 *The Arun District adopted Plan (adopted 2018) Policy H SP2 states development must:*

Protect, conserve or enhance the natural environment, landscapes and biodiversity;
- 3.2 *Policy ENV SP1 states:*

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.
- 3.3 *Policy W SP1 states development will be supported when it:*

Takes 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;

3.4 Policy ENV DM1 Designated Sites of biodiversity or geological importance states:

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:

i. There is no alternative solution (which shall be adequately demonstrated by the developer).

ii. There are reasons of public health or public safety or Adoption Arun Local Plan 2011-2031 (July 2018) Arun District Council 209 17 Natural Environment

iii. There are benefits of primary importance to the environment or iv. 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;

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.

3.5 Policy ENV DM3 Biodiversity Opportunity Areas states that 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.

3.6 Policy ENV DM4 Protection of trees states that:

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 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.

3.7 Policy ENV DM5 Development and biodiversity states that:

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.

3.8 Policy GI SP1 Green Infrastructure and development states:

The existing Green Infrastructure Network, as shown on the Green Network Maps for each parish and town, must be considered at an early stage of the design process for all major development proposals.

All major development must be designed to protect and enhance existing Green Infrastructure assets, and the connections between them, in order to ensure a joined up Green Infrastructure Network. The Green Infrastructure Network must be protected from light pollution to ensure that areas defined by their tranquillity are protected from the negative effects of light in development.

Where compatible with nature conservation objectives, development proposals must identify opportunities to connect existing Green Infrastructure assets with the coast, the South Downs National Park or to the District's inland villages. Opportunities to enhance the network should take account of the multiple functions of Green Infrastructure assets and should be based upon those opportunities set out in the supporting text.

Legislation

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

- The Conservation of Habitats and Species Regulations 2017;
- The Wildlife and Countryside Act 1981 (as amended);
- The Natural Environment and Rural Communities (NERC) Act 2006;
- The Hedgerow Regulations 1997;
- The Protection of Badgers Act 1992;
- The Protection of Mammals Act 1996.

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

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

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

3.13 All widespread reptiles are protected against killing and injury under the Wildlife and Countryside Act 1981, with rarer reptiles receiving further protection under EU regulation. Reptiles must also be given consideration under the NERC Act 2006 as part of the planning process.

3.14 Great crested newts (GCN) are protected under The Conservation of Habitats and Species Regulations 2017. It is an offence for anyone to intentionally kill, injure or disturb a GCN or to damage, destroy or block access to areas of suitable habitat.

3.15 Badgers are protected under the Protection of Badgers Act 1992. It is an offence to harm badgers or disturb badgers and their setts.

3.16 Water voles are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 and is a priority conservation species. It is an offence to intentionally capture, kill or injure water voles, damage, destroy or block access to their places of shelter or protection (on purpose or by not taking enough care), disturb them in a place of shelter or protection (on purpose or by not taking enough care), possess, sell, control or transport live or dead water voles or parts of them (not water voles bred in captivity).

- 3.17 In the UK, dormice are legally protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and have significant further protection as a European Protected Species under the Conservation of Habitats and Species Regulations 2017 (as amended). Dormice are also a 'Species of Principal Importance for the conservation of biodiversity' listed under section 41 of the Natural Environment and Rural Communities Act 2006 (NERC). It is an offence for anyone to intentionally kill, injure or disturb a dormouse or to damage, destroy or block access to areas of suitable habitat.
- 3.18 All other mammals receive general protection against cruelty, inhumane killing or injuring under the Protection of Mammals Act 1996.

4.0 Methodology

Desktop Study

- 4.1 A desktop study was conducted using the government 'MAGIC' Map GIS tool; a search was carried out for all international statutory designated sites (Ramsar, SAC, SPA) within 2km of the site; national statutory designated sites (SSSI, NNR, LNR) within 1km of the site; and non-statutory designated sites (SNCI) and priority habitats within 1km of the site. Any sites of relevance to the proposals are summarized below and their significance considered in the context of the development proposals. Given the nature of the proposals only sites which might be impacted are considered below and this is not an exhaustive list of all sites.
- 4.2 A search was carried out to identify features of ecological interest in the area, such as water bodies and ancient woodland. Given the overall scale and nature of the site and the proposals, a full data search from HBIC was not considered appropriate. This is in accordance with CIEEM current guidance for such projects.

Site Visit

- 4.3 A site visit was conducted on 6th November. Habitats were recorded broadly according to the UKHab Classification System as described within the UK Habitats Manual v2.01 (UKHab Ltd, 2023). All habitats present on-site were recorded on a UKHab map (Figure No. 01) and the site's location is shown on the site location plan (Figure No. 02).
- 4.4 During the survey any constraints with regard to protected species were considered; the site was considered for its potential for protected species even when signs of these species were not noted at the time of survey. Protected and Notable Species considered as part of this assessment include but are not limited to:
- Bats – Foraging, Commuting, Roosting, Swarming and Hibernating
 - Badgers – Sett-building, Commuting and Foraging
 - Dormice – Nesting and Commuting
 - Great Crested Newts and other Amphibians such as Common Toads – Terrestrial Active and Hibernation Habitat and Aquatic Habitat, including Commuting
 - Reptiles – Terrestrial Active and Hibernation Habitat
 - Rare or Notable Invertebrates
 - Rare or Notable Plants
 - Water Voles – Foraging and Shelter Habitats
 - Otters – Foraging and Shelter Habitats
 - White-clawed Crayfish

- 4.5 Due to the site visit being carried out over one day, it is possible that some signs of protected species may not be apparent within this short timeframe. This is a constraint recognised within the Survey Guidelines and all reasonable effort has been made to identify evidence of protected species.

Ecological Impact Assessment

- 4.6 The methodology for EclA follows best practice guidelines set by the Chartered Institute of Ecology & Environmental Management (CIEEM): 'Guidelines for Ecological Impact Assessment' (CIEEM, 2018). This includes identifying the baseline conditions on the site and subsequently rating the potential effects of the development (Figure No. 03) based on the sensitivity and value of the resource affected, combined with the magnitude, duration and scale of the impact (or change). This is initially assessed without mitigation measures, and then assessed again after allowing for the proposed mitigation measures; this provides the residual effects. The assessment is divided into construction effects and longer-term operational effects.
- 4.7 Each ecological feature within the site has been considered within a defined geographic context such as:
- International and European;
 - National;
 - Regional;
 - County;
 - District;
 - Local;
 - Site Level;
 - Negligible.
- 4.8 Based upon CIEEM guidance, value was determined with reference to the following factors:
- Its inclusion as a Designated Site or other protected area;
 - The presence of habitat types of conservation significance, e.g. Habitats of Principal Importance (NERC 2006);
 - The presence (or potential presence) of species of conservation significance e.g. Species of Principal Importance (NERC 2006);
 - The presence of other protected species e.g. those protected under The Wildlife and Countryside Act 1981;
 - The site's social and economic value.

5.0 Baseline Ecological Conditions and Protected Species Assessment

Desktop Study

Designated Sites and Habitats

- 5.1 The following information is included so that the site can be considered within the ecological context of the surrounding area, guiding decisions related to habitat change and protected species; these sites are not necessarily representative of the habitat on, or surrounding, the site and may not be influenced by the proposals.
- 5.2 No statutory sites lie within a 2.0km radius of the site. The site lies within the Risk Impact Zone of Climping Beach SSSI and Arundel Park SSSI. Due to the proposals, the LPA will not have to consult with Natural England.

Habitats

Desk Study

- 5.3 Priority Habitats Present within a 2.0km radius of the site includes: Traditional Orchards, Deciduous Woodland, Ponds and Lakes, Intertidal Substrate Foreshore, Coastal and Floodplain Grazing Marsh, Mudflats and Coastal Saltmarsh.

Site Assessment

- 5.4 The site is given over to areas of modified grassland surrounding the workers accommodation and an unmade track. In the east of the site is an area of vacant land with forbs.
- 5.5 A number of off-site habitats are present immediately adjacent to the site. These habitats include a deciduous woodland and hedgerows with trees.

g4 – Modified Grassland

- 5.6 The majority of the site consists of well maintained modified grassland. Species noted include perennial ryegrass *Lolium perenne*, red fescue *Festuca rubra*, daisy *Bellis perennis*, and dandelion sp. *Taraxacum sp.* Overall, this habitat s of **low** ecological value.

U1b5 – Buildings

- 5.7 Across the site are several mobile homes. These are of **negligible** ecological value, their value for protected species shall be discussed in Section 6.0 below.

U1b – Developed Land

- 5.8 Across the site is an access track of crushed hardcore, with concrete and tarmac access road. This habitat is of **negligible** ecological value.

U1f 82, 16 – Vacant land with Tall Forbs

- 5.9 In the eastern side of the site lies an area of turned over earth with tall forbs and ephemeral vegetation growing. Species include bristly oxtongue, burdock, creeping thistle, broadleaved dock and other common ruderal forbs. Several grasses including false oat and creeping bent were noted. A balancing pond is present within the area, but given the unevenness of the ground and the density of tall forbs, this was not readily apparent. Overall, this habitat is of **site** ecological value.

W1g - Broadleaved Woodland

- 5.10 To the west lies a broadleaved woodland. This habitat consists of: pedunculate oak, field maple, ash and sycamore. The woodland had extensive coverings of a low-diversity ground flora such as ivy, nettle, and lords and ladies. Overall this habitat is of **local** ecological value.

H2a, 32 – Native Hedgerow with trees

- 5.11 To the south of the site lies a unkempt hedgerow measuring approx. 4.0m in height and 2.0m in width. Species noted include hawthorn and ivy. Trees noted within the hedgerow include ash. Overall, this habitat is of **site** ecological value.

6.0 Protected Species Assessment

Bats

Desk Study

- 6.1 No European Protected Species Mitigation Licences (EPSML) are noted within a 2.0km radius of the site.

Site Assessment

- 6.2 All mobile homes and buildings on the site were of no value to bats. The mobile homes are of uPVC with corrugated plastic roofs. All service buildings for laundry / toilet blocks are of metal, very modern and devoid of suitable roost features. Overall the buildings are of **negligible** value for bats.
- 6.3 There are no mature trees within the site that support PRFs for bats. The woodland to the west of the site is likely to be of **local** value to foraging and commuting bats, and may support roosting bats.
- 6.4 The immediate surrounds of grassland with hedgerows and the woodland are of **low site value** for commuting and foraging bats, with habitats being of low diversity and impacted by nighttime lighting from the nursery.

Birds

Site Assessment

- 6.5 The majority of the site is of little value to birds. The grassland may provide very limited foraging value for species such as starling, blackbird and robin. The ephemeral and tall forbs to the east may provide value for species such as goldfinch, but are largely unsuitable for ground-nesting with the forbs being too tall and dense to allow good sightlines or take-off. Overall the site is of **low** value to foraging birds.
- 6.6 The woodland provides nesting opportunities for a range of widespread and common species. Overall, the woodland is of **local** value to nesting birds.

Reptiles

Desk Study

- 6.7 No EPS mitigation licences for rare reptiles have been granted within 2km of the site.

Site Assessment

- 6.8 The majority of the site is of no value to reptiles due to the well maintained modified grassland. The area of tall forbs offers potential foraging habitat for reptiles, with some hibernation and shelter to the hedges and margins. The majority of the site is of **negligible** value for reptiles. The eastern end of the site provides **site** value for reptiles.

Amphibians

Desk Study

- 6.9 No EPS mitigation licences for GCN have been granted within 2km of the site and there are no GCN survey or licence returns (positive or negative) within the search area either. This suggests either limited survey effort due to lack of local development, or a lack of suitable ponds due to the geology.
- 6.10 There are 6no. waterbodies within a 500 meter radius of the site.

Site Assessment

- 6.11 The three closest waterbodies to the site are large reservoirs with no vegetation present and used for the nursery. The site itself is of very limited value to amphibians due to the modified grassland and well used nature of the site. Amphibian value is limited to the tall forbs in the east. Overall, the site is of **site** value for amphibians with the presence of GCN being highly unlikely.

Other

Site Assessment

- 6.14 No potential for, or evidence of, any other protected species such as otter, water vole, white-clawed crayfish, rare plants or notable invertebrates was recorded. The modified grasslands within the site offer suitable foraging habitat for hedgehog. No impacts upon this species are considered likely and therefore they have not been assessed further.

7.0 Evaluation of Impacts and Mitigation

Designated Sites

Potential Impacts

- 7.1 None foreseen.

Mitigation and Compensation

- 7.2 None required.

Residual Impacts

- 7.3 The overall impact of the scheme will be **negligible**.

Habitats

Potential Impacts

- 7.4 The proposals do not require changes in habitat and therefore no impacts are foreseen. The proposals are for the extension of an existing permission.
- 7.5 As the proposals were conducted prior to August 2023 and were authorised by a planning permission, the correct baseline for BNG purposes would be that present today. As this application only seeks to retain these habitats, the proposals would be exempt from BNG under the *de minimis* exemption. In any case, for the purposes of according with local policy, a separate BNG assessment is included detailing how a 10% gain would be achieved.

Mitigation and Compensation

- 7.6 None required. Habitats on site shall be retained as-is. Some additional native planting would occur; the balancing pond to the east might require clearance or de-silting but this would not affect it's habitat type overall. As these would all have a net positive impact the *de minimis* exemption still applies.

Residual Impacts

- 7.7 The overall impact of the scheme will be **negligible**.

Bats

Potential Impacts

- 7.8 There is no significant roost suitability within the building or trees within the site. All trees within the woodland are to be retained. Inappropriate lighting could lead to a loss of foraging and commuting value of the site edges.

Mitigation and Compensation

- 7.9 All lighting must continue to strictly accord with the BCT/ILP Guidance Note 08/23, with minimal illumination of the woodland to the north of the site in particular. Lighting shall be strictly controlled to avoid unnecessary illumination at night.

Residual Impacts

- 7.10 The overall impact of the scheme will be **negligible**.

Nesting Birds

Potential Impacts

- 7.11 None foreseen. The site shall continue to be used as-is. There is a low risk of disturbance of ground-nesting birds should any works be required to the balancing pond (e.g. vegetation clearance or de-silting).

Mitigation and Compensation

- 7.12 Any clearance of vegetation within the area of tall forbs shall either occur outside the nesting bird season (March-August inclusive) or be preceded by a walkover to check for any signs of nesting birds. Should any nests be present, these must be allowed to fledge with at least a 15.0m buffer between works and the nest.

Residual Impacts

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

Reptiles and Amphibians

Potential Impacts

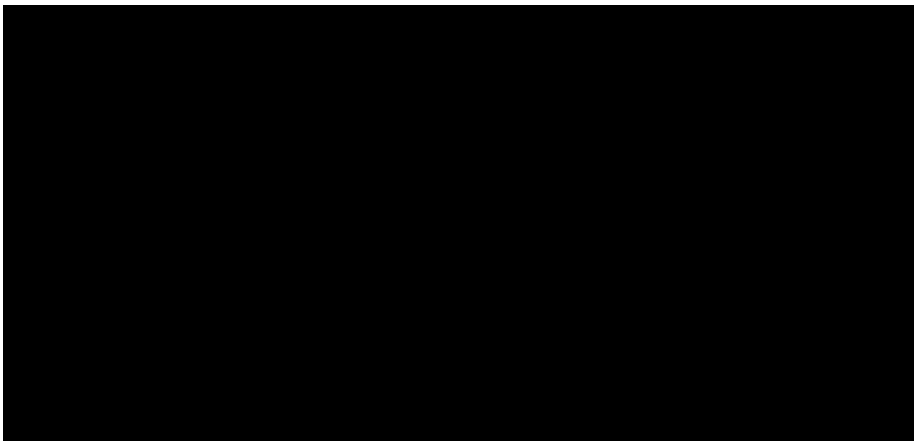
- 7.14 None foreseen. The grassland shall be mown regularly as it currently is. The area of tall forbs shall be retained. Any works to the balancing pond (e.g. vegetation clearance or de-silting) shall be preceded by careful manual strimming of the forbs, to no higher than 100mm height, with the arisings being raked away from the works area and the habitat being left for 24 hours for animals to vacate, before clearance and excavation. All such excavation and clearance shall occur between March-October inclusive, to avoid any risk to hibernating wildlife.

Mitigation and Compensation

- 7.15 None required.

Residual Impacts

- 7.16 The overall impact of the scheme will be **negligible**.



Other

Potential Impacts

7.20 None foreseen.

Mitigation and Compensation

7.21 None required.

Residual Impacts

7.22 The overall impact of the scheme will be **negligible**.

8.0 Ecological Enhancements

- 8.1 The site is exempt from BNG due to the *de minimus exemption*, as described above. In any case, for the purposes of according with local policy, a separate BNG assessment is included detailing how a 10% gain would be achieved.
- 8.2 A number of enhancement options listed below are recommended to be adopted as part of the proposals:
- Addition of a bird box and a bat box to retained, mature trees within the woodland to enhance roosting opportunities for a range of species;
 - Addition of log piles around the attenuation basin and within the woodland, using native wood arisings, and compost piles from cuttings.

9.0 Conclusions

- 9.1 Overall, the proposals are considered to represent a 'low' impact upon ecology and no further surveys are recommended. The proposals are for the renewal of an existing permission. As such no impacts to habitats or species is anticipated.
- 9.2 The proposals are not anticipated to have any significant impact upon any designated sites or protected species, provided the mitigation measures listed in this report are followed. There is potential for protected and notable species within the site but impacts would be negligible.
- 9.3 As a renewal of an existing permission with no material changes other than some beneficial native planting, proposals are considered to be exempt from mandatory Biodiversity Net Gain.

10.0 References

Arun District Council (2011-2031). Adopted July 2018. [Adoption Arun Local Plan 2011-2031 \(July 2018\)](#)

Bat Conservation Trust (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines. Third Edition. Available online:
<http://www.bats.org.uk/pages/batsurveyguide.html>

Bat Conservation Trust and Institution for Lighting Professionals (BCT/ILP, 2023). Bats and Artificial Lighting at Night. Available online: <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

British Standards Institution. (2013). BS 42020:2013 Biodiversity – Code of practice for planning and development. London: BSI Joint Nature Conservation Committee (JNCC 2010). Handbook for Phase 1 habitat survey - a technique for environmental audit. Available online: <http://jncc.defra.gov.uk/page-2468>

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

CIEEM (2020) Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management. Winchester, UK.

CIEEM (2021) Bat Mitigation Guidelines, Beta Version 1.0. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM (2022) Guidelines for Ecological Impact Assessment, 1st edition, Revision 1.02. Chartered Institute of Ecology and Environmental Management, Winchester.

Joint Nature Conservation Committee (JNCC 2010). Handbook for Phase 1 habitat survey - a technique for environmental audit. Available online: <http://jncc.defra.gov.uk/page-2468>

MAGIC Interactive Map Tool (Accessed 7th January 2026): www.magic.gov.uk

Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield.

Streeter, D. (2010). The Most Complete Guide to the Flowers of Britain and Ireland; Harper Collins, London.

UK Hab Ltd. (2023). The Habitat Classification Version 2.0. Available online: <https://www.ukhab.org>

Appendix A – Site Photos

Photo 1 – Toilet / laundry building with modified grassland.



Photo 2 – Mobile homes with modified grassland.



Photo 3 – Tall forbs in the east of the site.



Photo 4 – Hedgerow to the south of the site.



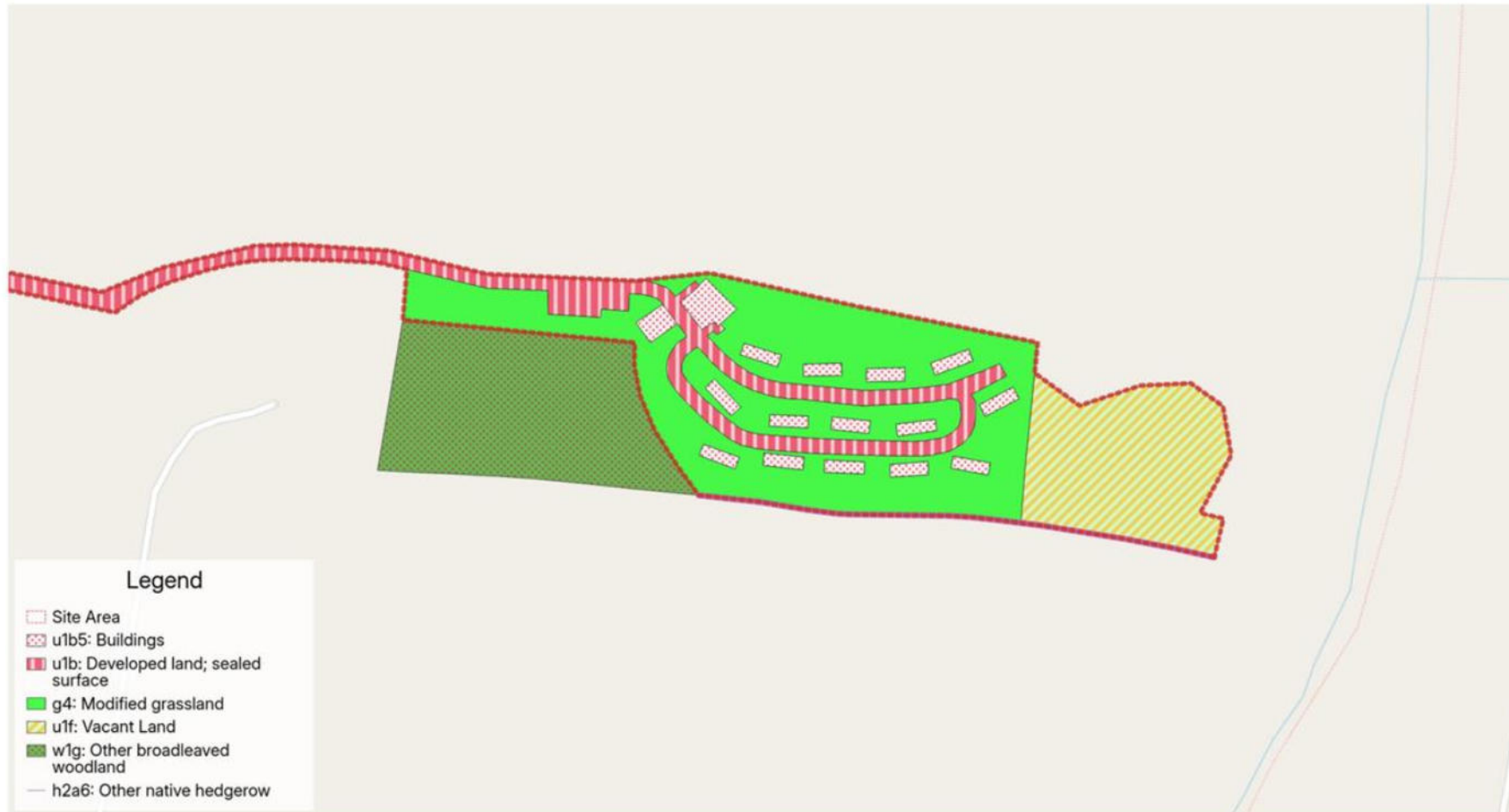
Photo 5 – The broadleaved woodland to the west of the site.



Photo 6 – The nursery offsite to the north.



12.0 Figure No. 01 – UKHab Habitat Map



13.0 Figure No. 02 – Site Location Plan



14.0 Figure No. 03 – Proposed Site Layout

