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ECOLOGICAL APPRAISAL

Client

Hallway Properties Limited

Project

Land at Norway Lane,

Littlehampton

Date

May 2025

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Rev	Issue Status	Prepared/Date	Approved/Date
-	Draft	AC / OMS / 02.12.24	KAB / 12.12.24
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Rev A	Final	OMS / 24.04.25	N/A minor amendments
Rev B	Final	OMS / 06.05.25	N/A minor amendments
Rev C	Final	CHK / 14.05.2025	HOH / 15.05.2025

1.0 NON-TECHNICAL SUMMARY

Report Scope and Methodology
FPCR were commissioned by Hallway Properties Limited to undertake Ecological Surveys at Land at Norway Lane, Littlehampton to provide an ecological baseline for the Site and determine its ecological importance. The proposals for the Site include the conversion and sub-division of two warehouse units (Unit 5 & Unit 6) and the demolition of an office building (Unit 7) to provide additional parking. Surveys to inform this assessment include a UKHab survey, a desktop study, Habitat Condition Assessment surveys, bat and breeding bird surveys.
Ecological Baseline and Impact Assessment
There are 3 internationally designated sites within 15km of the Site including Solent and Dorset Marine SPA, The Arun Valley RAMSAR, SPA & SAC and Duncton to Bignor Escarpment SAC. The proposals will not have a significant direct or indirect effect on these sites. The Site is dominated by habitats of low ecological value including built environments and introduced shrub, and amenity grassland. Further habitats of medium ecological value are present in the form of hedgerows, urban trees and ponds are limited to the southern extent of the site. The three onsite buildings were assessed for their potential to support roosting bats; two had negligible potential (B1 & B2) and one had high potential (B3). Three nocturnal surveys were undertaken and no roosting bats were recorded. The two onsite and one offsite ponds were assessed for the presence of great crested newts using eDNA analysis, all of which came back negative. The Site supports limited suitability for nesting birds, reptiles and for foraging/sheltering hedgehogs. Badgers were assessed as being likely absent from the Site due to a lack of evidence and limited extent of habitat.
Residual Effects
The proposals are not anticipated to lead to any significant effects on any ecological receptors or designated sites. Mitigation recommendations have been provided to avoid harming protected and notable species during works including nesting birds, reptiles and hedgehogs. The proposals will look to have a minimum 10% net gain in biodiversity units. This will be achieved through the purchase of offsite unit.

2.0 INTRODUCTION

2.1 The following Ecological Appraisal has been prepared by FPCR Environment & Design Ltd. on behalf of Hallway Properties Limited for Land at Norway Lane, Littlehampton (central OS Grid Reference: TQ 03805 03458) herein referred to as 'the Site'. To inform this assessment, the Site has been subject to a UK Habitat Classification Survey, a Defra Habitat Condition Assessments survey and a preliminary bat roost assessment, nocturnal bat surveys and breeding bird surveys.

2.2 This report has been prepared to achieve the following objectives:

- provide a summary of the methods and results of survey work completed to establish an ecological baseline;
- set out mitigation measures recommendations where necessary to comply with nature conservation legislation and to address any potentially significant ecological effects;
- provide an assessment of potential ecological impacts associated with the proposals;
- set out mitigation measures recommendations where necessary to comply with nature conservation legislation and to address any potentially significant ecological effects; and
- identify appropriate enhancement measures and consider biodiversity net gain;

Site Context

2.3 The Site comprises a business park with three industrial units (Unit 5, Unit 6 & Unit 7) and associated parking, along with two ornamental ponds and landscaped planting which is dominated by ornamental shrubs. Also present are areas of hardstanding roads and pavements.

2.4 The Site is situated to the north-east of Littlehampton, the surrounding habitat is dominated by urban environments including residential housing to the south, east and west. In addition to a school and church with associated cemetery to the south and a new housing development to the north. There is also a large industrial unit directly to the north of the Site. Greenspace is limited, with larger extents of more semi-natural environments present including a golf course to the north of the Site.

Site Proposals

2.5 The proposals for the Site include part demolition, conversion, refurbishment and re-elevation of Units 5 and 6 and construction of retail (food and non-food), leisure and food & beverage units (Use Class E), together with associated car parking, access, loading areas, landscaping and associated works. Unit 7 i.e. the former office building, is being demolished to facilitate the proposed development and as a first enabling phase. The demolition of Unit 7 forms part of an earlier Prior Notification of demolition application (ref. LU/27/25/DEM) .

3.0 LEGISLATION AND POLICY

3.1 Details on the relevant national and local policy and legislation for ecology in relation to development sites are provided in Appendix A. The national policy and legislation most relevant here are:

- The Conservation of Habitats and Species Regulations ("The Habitats Regulations") 2017 (as amended) in relation to the European Protected Species (EPS) great crested newt, (GCN), bats (all species) and dormouse; and European protected sites i.e. Special Areas of Conservation (SAC), Special Protection Areas (SPAs) and Internationally protected "Ramsar Sites" (collectively known as "Natura 2000 sites"). Annex II bat species of particular relevance in relation to SACs designated for bats.
- The Wildlife and Countryside Act 1981 (WCA) (as amended) in relation to all wild birds (including Schedule 1 species), other animals (notably Schedule 5 species), flora (those listed in Schedules 8 and 9) and Sites of Special Scientific Interest (SSSI);
- Protection of Badgers Act 1992;
- Natural Environmental and Rural Communities (NERC) Act 2006 in relation to various priority species and habitats;
- Hedgerow Regulations 1997 made under Section 97 of the Environment Act 1995;
- National Planning Policy Framework (NPPF) (2024);
- The Environment Act 2021
- Local Nature Reserves (LNR) as designated most recently by the NERC Act 2006;
- Non-statutory protected local sites including County Wildlife Sites (CWS), Sites of Importance for Nature Conservation (SINC), Local Wildlife Sites (LWS) and Ancient Woodland Inventory (AWI) sites;
- Local Biodiversity Action Plans (LBAP); and
- Birds of Conservation Concern (BoCC).

Biodiversity Net Gain

The Environment Act 2021

3.2 In England, biodiversity net gain is now required under statutory frameworks introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Under this framework, every grant of planning permission will be deemed to have been granted subject to a general biodiversity gain condition. This will require an objective for developments to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of all onsite habitats.

3.3 This is a pre-commencement condition requiring the provision of a Biodiversity Gain Plan to be submitted and approved before works can be commenced, but after planning permission has been granted.

3.4 In principle, the grant of planning permission is not within the scope of BNG, however it is important to consider as part of the consenting body's decision-making process how a scheme will able to demonstrate BNG after permission is granted. Therefore, this biodiversity net gain

report presents the results of a Biodiversity Net Gain assessment that has been completed in order to demonstrate how the proposals will be compliant with the requirements of the Environment Act

Biodiversity Net Gain Hierarchy

3.5 The statutory framework allows for the 10% biodiversity gain to be delivered through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits. However, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, development must consider the biodiversity net gain hierarchy when designing scheme proposals. This sets out hierarchy of actions as follows:

- First, for all medium, high and very high distinctiveness habitats, the avoidance of any adverse effects.
- Where these can't be avoided, mitigating any adverse effects on medium, high and very high distinctiveness habitats.
- Then, for all onsite habitats (including low distinctiveness), adverse effects should be compensated by in accordance with the following hierarchy:

a) Prioritising the enhancement of existing habitats; then

b) Creation of onsite habitats;

c) Allocation of registered offsite unit gains; then

d) Purchase of biodiversity credits

3.6 Proposals must demonstrate how the biodiversity hierarchy has been applied to or provide the reasons for any deviation. This biodiversity net gain hierarchy is distinct from the mitigation hierarchy set out in paragraph 187(d) of the National Planning Policy Framework (2024).

Exemptions

3.7 There are a number of circumstances where a Site will be exempt from biodiversity net gain including:

- Development impacting habitat of an area below a 'de minimis' threshold of 25m^2, or 5m for linear habitats.
- Householder applications (as defined within article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015).
- Self-build and custom-build applications (no more than 9 dwellings, site no larger than 0.5 ha and consists exclusively of self-build/ custom dwellings).
- Biodiversity gain sites (where habitats are being enhanced for wildlife only).
- Previously developed land with a baseline score of zero (exempted via the metric).

3.8 The proposals for the Site do not fall under any of the above criteria and the accompanying BNG report has therefore been prepared in order to aid the Arun District Council in their decision-making process.

Mandatory Biodiversity Net Gain Minimum Reporting Requirements

3.9 The BNG PPG sets out the minimum requirements of any planning application subject to mandatory BNG to present as part of any submission in order to validate the application. For ease of reference, the minimum information required has been set out in *Table 1* below.

3.10 Additional detail and information appropriate to the application is provided within the accompanying BNG report in order to assist Arun District Council in their decision-making process and to provide confidence that the scheme will be able to demonstrate a mandatory BNG through the provision of a Biodiversity Gain Plan following receipt of planning permission, in accordance with the PPG.

Table 1: Checklist of Minimum BNG Reporting Requirements for Planning Application Validation

Minimum Requirements in BNG PPG	Statement of Relevance to the Site
Confirmation that the Site is believed to be subject to the mandatory BNG condition.	The Site does not meet any of the exemption criteria and so it is understood that the site will be subject to the mandatory BNG condition.
The pre-development biodiversity value of the Site, either on the data of application or an earlier proposed date (as appropriate).	The accompanying Statutory Metric completed for the scheme provides the pre-development biodiversity value of the Site. The values are also presented within this report.
Where an earlier date is proposed, provide the reasons for proposing that date.	The 'relevant date' is proposed to be the latest date that a Site survey was completed during which observations were made to check if any significant changes in habitats had occurred. For the Site, this will be 19th September 2024. This is considered to be an appropriate date as it is within the data that ecological data is considered valid (two years, as recommended by CIEEM).
The completed metric calculation showing the calculations of the pre-development biodiversity value of the onsite habitat on the data of application (or proposed earlier date) including the publication date of the biodiversity metric used.	The Statutory Biodiversity Metric, published on 7 July 2024, was used to calculate the pre-development value of the Site. The completed metric has been provided alongside the BNG report.
A statement whether activities have been carried out prior to the date of application (or proposed date), that result in loss of onsite biodiversity value (degradation).	No activities had taken place prior to the walkover survey of the site on 12 June 2024 that resulted in loss of onsite biodiversity value.
A description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity gain Requirements (Irreplaceable Habitat) Regulations 2024) on the Site, that exists on the date of application (or an earlier proposed date)	This statement confirms that no irreplaceable habitat has been identified onsite.
Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date) including any irreplaceable habitat (if applicable).	Figure 3 shows the baseline habitats present onsite on the proposed relevant date (12 June 2024). This includes the minimum requirement to show an identified scale and north arrow.

4.0 METHODOLOGY

4.1 In order to compile existing baseline information, relevant ecological information was requested from the following consultees and sources:

- Multi Agency Geographic Information for the Countryside (MAGIC) website ;
- Colour 1:25,000 OS base maps ;
- Aerial photographs from Google Earth.
- Sussex Biodiversity Records Centre (SxBRC);

4.2 The search area for biodiversity information was related to the significance of sites and species and potential zones of influence, as follows:

- 15km around the application area for sites of International Importance (e.g. Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites).
- 2km around the application area for sites of National or Regional Importance (e.g. Sites of Special Scientific Interest (SSSIs).
- 1km around the application site for sites of County Importance (e.g. Biological Heritage Sites (BHS) and Local Wildlife Sites (LWS)) and species records (e.g. protected, Local Biodiversity Action Plan (LBAP) or notable species).

Field Surveys

UK Habitat Classification Survey

4.3 The Site was subject to a field survey by FPCR on 12 June 2024 using a methodology broadly based on UK Habitat Classification System (UKHab) and the Defra Biodiversity Net Gain Statutory Metric User Guidance. This involved a systematic walk over of the Site to classify the broad habitat types and identify any Habitats of Principal Importance (HPI) for the conservation of biodiversity as listed within Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act 2006. Habitats were broadly mapped in the field using a detailed topography map produced for the scheme using pens or pencils as appropriate.

4.4 Habitat condition assessment surveys were also completed in accordance with the Statutory Biodiversity Metric Habitat Condition Assessments. The summary results of the habitat condition assessment survey results are presented in this report.

4.5 Where feasible, target notes and species lists were compiled for individual areas and assessments of abundance were made using the DAFOR scale. Vascular plant nomenclature follows Stace (2010). Whilst the species lists collected should not be regarded as exhaustive, sufficient information was gained during the survey to enable classification and assessment of broad habitat types and identify features likely to be of interest.

Preliminary Protected Species Assessment

4.6 During the extended Phase 1 Habitat surveys, observations, identification and signs of any species protected under the following list of Acts and Regulations (collectively referred to herein as 'Protected Species') were recorded:

- Schedule 1 of the Wildlife and Countryside Act 1981 (as amended);

- The Protection of Badgers Act 1992; and
- The Conservation of Habitats and Species Regulations 2017.

4.7 Consideration was also given to the existence and use of the site by other fauna listed as one or more of the following (collectively referred to herein as 'Notable Species'):

- Species of Principal Importance (SPI) for the conservation of biodiversity in England on the Natural Environment and Rural Communities (NERC) Act, Section 41 (S41)
- Species listed on any Local Biodiversity Action Plan (LBAP) initiatives
- Red Data Book (RDB) species.

4.8 The likely presence or absence of protected and notable species has been assessed by a number of factors including the availability of suitable habitat, connectivity, known species distribution, local records and an understanding of the ecology and habitats requirement of the individual species assessed. Examples of the types of criteria for likely presence/absence used as part of this assessment are provided in *Table 2*.

Table 2: Criteria for Assessing Presence/ Likely Absence of Protected/Notable Species.

Likelihood of Presence	Example Criteria
Negligible	Where one or more of the following is true for the site: it offers no suitable habitat; it is isolated from known areas of suitable habitats/species presence; displays no evidence of use by the species in question; it is outside of the known local/regional/national distribution for the species; and there are no desk study records are present during the data search.
Low	Where one or more of the following is true for the site: the habitats present are of poor to moderate suitability; it is limited or restricted connectivity to areas of suitable offsite habitat or areas with known presence; it is in a location where the species distribution is known to be sparse at a local or regional scale; the desk study indicates the presence of the species in the locality in small to moderate numbers.
Moderate	Where one or more of the following is true for the site: the habitats present are of moderate to high suitability; it is clearly connected to suitable offsite habitat offsite habitat or areas with known presence; it is in a location where the species is known to be well distributed; the desk study indicates the presence of the species in the locality in moderate to good numbers.
High	Where one or more of the following is true for the site: the habitats present are of optimal suitability; it is adjacent to areas of suitable offsite habitat offsite habitat or areas with known presence; it is in a location where the species is known to be well distributed; there are field signs evidencing that a species has been present on the site; the desk study indicates the presence of the species has been historically present on or within the immediate vicinity of the site.
Present	The species was observed using the site during the extended phase 1 habitat survey or, where appropriate for certain species, field signs indicate the regular use of the site i.e. the presence of a badger sett.

Further Protected Species Surveys

4.9 Following the preliminary protected species surveys, further surveys were undertaken to assess the suitability of the onsite building for its potential to support roosting bats.

Building Roost Assessment

4.10 Internal and external building assessments were carried out on site by an experienced ecologist and accredited agent (Natural England reference: 2023-11489-CL17-BAT) on 21 June 2024, based on Bat Conservation Trust's (BCT) best practice guidance (BCT, 2023).

4.11 The exterior of the building was visually assessed for potential roosting features (PRFs), access points and evidence of bat activity. Features, such as small gaps under barge/soffit/fascia boards, raised or missing roof tiles and gaps at gable ends, which have the potential to be used as access points, were sought. Evidence that bats actively used potential access points including staining or bat droppings under gaps. Indicators that potential access points had not been recently used include the presence of cobwebs and general detritus.

4.12 The interior of the buildings was visually assessed for evidence of bat activity and/or or the potential to be used by bats using a high-powered torch. Evidence of a roost was searched for, such as the presence of a dead or live bat(s), concentrated piles or scattered droppings, food remains such as insect wing fragments as well as scratch marks and/or staining.

4.13 The buildings were then placed into bat roost potential categories as per the most up-to-date BCT guidance at the time (BCT, 2023) and summarised in *Table 3*.

Table 3: Bat Roost Potential Categories for Trees and Buildings

Likelihood of Presence	Example Criteria
Negligible Potential	No features present likely to be used by roosting bats.
Low Potential	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats.
Moderate Potential	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (irrespective of species conservation status, which is established after presence is confirmed).
High Potential	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Confirmed Roost	Evidence of roosting bats in the form of live/dead bats, droppings, urine staining, fur oil staining etc.

Emergence Surveys

4.14 Due to Unit 7 being classified as high potential for roosting bats after the initial building roost assessment, two nocturnal building surveys were carried out by suitably experienced/ licenced ecologists on three separate occasions in 2024.

4.15 Surveyors were positioned to cover all PRF's. Surveys began approximately 15 minutes prior to sunset and lasted either an hour and 30 or an hour and 45 minutes after sunset. The number and species of bats observed emerging from, entering or passing the building was recorded.

4.16 Surveyors were equipped with Wildlife Acoustics Inc. Echo Meter Touch® bat detectors in conjunction with Echo Meter Touch® app and Samsung Galaxy Tab Active 3®. Post-survey, the bat calls recorded during the emergence were analysed by experienced ecologists using Kaleidoscope software (Wildlife Acoustics Inc.) to verify the bat species and activity levels.

4.17 Five surveyors attended the nocturnal surveys, each equipped with two night vision aids (NVA's) to enhance visibility of the survey area throughout the survey. One NVA was reviewed during the survey and the second unmanned NVA extracted and reviewed after the survey.

4.18 NVA's were set to record for the duration of the survey. Where roosting bats or uncertain behaviours were observed, footage was extracted, and analysed. A still shot of the darkest point of the survey was also extracted and saved and are included in Appendix B. NVA's used were Nightfox Whisker night vision binoculars with a Nightfox XB10 IR torch for each unit.

4.19 The nocturnal surveys were conducted in appropriate conditions as detailed in Table 4 below.

Table 4: Summary of Nocturnal Survey Dates and Conditions

Survey date	Buildings covered	Start/ Finish	Sunset	Conditions
05.08.24	Unit 7	S - 20:25 F – 22:25	20:40	18 - 19°C 0 – rain 0-60% cloud cover 1 – 2 wind BF
27.08.24	Unit 7	S – 19:42 F – 21:27	19:57	18 - 21°C 0 – rain 50-70% cloud cover 0 – 1 wind BF
19.09.24	Unit 7	S - 18:51 F - 20:36	19:06	17 - 23°C 0 – rain 0 – 10% cloud cover 2 – 4 wind BF

Great Crested Newts (GCN)

4.20 The habitats within the survey area were evaluated for their potential to support GCN's during both their breeding and terrestrial phases, including an assessment of waterbodies.

Habitat Suitability

4.21 Two ponds within the Site boundary and one off-site pond approximately 8m north-east were assessed using the Habitat Suitability Index (HSI) for their potential suitability for GCN. HSI

provides a measure of the likely suitability that a waterbody will support newts[1]. In general, waterbodies with a higher score are more likely to support GCNs than those with a lower score and there is a positive correlation between HSI scores and waterbodies with newts recorded. Ten separate attributes are assessed for each waterbody:

- Geographic location;
- Pond area;
- Pond drying;
- Water quality;
- Shade;
- Presence of water-fowl;
- Presence of fish;
- Number of linked ponds;
- Terrestrial habitat; and
- Macrophytic coverage.

4.22 A score is then assigned according to the most appropriate criteria level set within each attribute and a total score calculated of between 0 and 1. Pond suitability is then determined according to the following scale:

Table 5: Habitat Suitability Index Scores and Pond Suitability

HIS Score	Pond Suitability
-0.5	Poor
0.5 – 0.59	Below average
0.6 – 0.69	Average
0.7 - 0.79	Good
>0.8	Excellent

1 Oldham R.S., Keeble J., Swan M.J.S. & Jeffcote M. (2000). Evaluating the suitability of habitat for the Great Crested Newt (*Triturus cristatus*). Herpetological Journal 10 (4), 143-155.

eDNA Survey

4.23 Environmental DNA (eDNA) sampling was undertaken on the three waterbodies on 21 June 2024 in accordance with natural England recommended protocol[2]. Waterbody locations are shown in Figure 5. Sampling was undertaken by an appropriately licenced and experienced ecologist.

4.24 Sampling was undertaken using kits obtained from ADAS. This comprised taking samples of agitated water from 20 locations around the waterbody and mixing thoroughly. 15ml of this water was then placed into each of the 6 sterile sample tubes containing preservative, precipitates and a DNA sequence that was used for degradation control. All samples were stored in accordance with the protocols provided by the laboratory. The samples were then transported under suitable conditions to the ADAS laboratory for analysis. Following analysis, results provided by the laboratory could have one of three outcomes, described in Table 6.

Table 6: Possible results of eDNA analysis

Result	Description
Positive	A positive result means GCN eDNA was detected and they have been present within the water in the 20 days preceding sampling. A score is provided indicating the number of positive replicates from a series of twelve.
Negative	GCN eDNA was not detected. Where samples are negative, further testing for PCR inhibitors and degradation of the sample is undertaken.
Inconclusive	Controls indicate degradation or inhibition of the sample. Therefore, the lack of detection of GCN eDNA is not conclusive evidence for determining the absence of this species using the sample provided.

Breeding Bird Survey

4.25 A single breeding bird survey took place on 12 June 2024. This survey was conducted to ascertain the potential of the Site to support breeding bird species, assessed to be of some conservation importance for their inclusion on the WCA Schedule 1, NERC S41 and/or BoCC Red or Amber lists. These species are considered likely to be at greatest threat in relation to further decline and are commonly referred to as 'notable' species.

4.26 The survey methodology employed was broadly based on that of territory mapping[3] as used for the British Trust for Ornithology (BTO) Common Bird Census (CBC). Standard BTO species codes and symbols for bird activities were used to identify birds and denote activity, sex and age where appropriate.

4.27 The Site was walked over a one-day period by an experienced ecologist, between sunrise and 11:00. A route was mapped out prior to the survey being undertaken, with particular attention

[2] Biggs, J. *et al.* (2014) *Analytical and Methodological Development for Improved Surveillance of the Great Crested Newt.* Appendix 5: Technical advice note for field and laboratory sampling of great crested newt (*Triturus cristatus*) environmental DNA. Freshwater Habitats Trust, Oxford.
[7] Bibby, C.J., N.D. Burgess & D.A. Hill, 2000: Bird Census Techniques: 2nd Edition. London: Academic Press

paid to linear features, such as hedgerows and tree lines, as well as other natural features, such as areas of scrub or waterbodies.

4.28 The survey was not undertaken in unfavourable conditions such as heavy rain or strong wind, which may negatively affect the results.

Limitations

4.29 Access was not granted at the time of the survey to undertake an internal inspection of the roof void in Unit 7. However, as the building had high potential to support roosting bats, three nocturnal surveys were undertaken and so this is not considered to be a constraint.

5.0 RESULTS

Desk Study

Designated Sites

5.1 The designated sites below are shown *in Figure 1: Designated Sites Plan*.

Internationally Designated Sites

5.2 Three internationally designated sites were located within 15km of the Site. The closest of these sites is Solent and Dorset Marine SPA which is located approximately 6.2km south west of the Site boundary. The site is designated due to the breeding populations of Little Terns *Sterna albifrons*, Common Tern *Sterna Hirundo* and Sandwich Tern *Sterna Sandvicensis*.

5.3 The Arun Valley RAMSAR and SPA is approximately 9.7km north of the Site boundary and comprises mainly of wet meadows, dissected by ditches on the floodplain of the River Arun between Pulborough and Amberly. 487.48ha is designated as an SAC owing to the site being one of the three main population centres for the Ramshorn snail *Anisus vorticulus* in the UK. 528.62ha is designated as an SPA due to the population of Bewick's sawn *Cygnus columbianus bewickii,* and a Ramsar site due to the presence of seven species of invertebrates present on the British Red Data Book as threatened, four nationally rare and four nationally scarce plant species.

5.4 Duncton to Bignor Escarpment SAC is approximately 11.3km northwest of the Site boundary and is designated for the *Asperulo-Fagetum* beech forests that occur in mosaic with ash *Fraxinus excelsior* woodland, scrub and grassland; the forests are a mixture of high forest and old pollards. The site has a diverse mollusc population and has rare plants including white helleborine *Cephalanthera damasonium*, yellow bird's nest *Monotropa hypopitys* and green hellebore *Helleborus viridis*.

Nationally Designated Sites of Nature Conservation Importance

5.5 No nationally designated sites were identified within 2km of the Site.

Non-Statutory Sites

5.6 There were no non-statutory designated sites within the 1km search area.

Protected/Notable Species

5.7 Records of protected or otherwise notable taxa provided by SxBRC, within 1km of the Site boundary (and 2km for bat species) are listed in *Table 7* below and shown in *Figure 2 Protected Species Plan*.

5.8 Records have been provided from the last ten years; however, the whole set of data was analysed to the likelihood of impacts as a result of proposals. In the case of bird species, there were a vast number of results returned and so these were not included in the table. Bird species recorded included a range of protected/notable species within 1km of the Site, including: Cetti's warbler *Cettia* cetti, Common scooter *Melanitta* nigra, Dunnock *Prunella* modularis, Kestrel *Falco tinnunculus*, Lesser black-backed gull *Larus fuscus*, Skylark *Alauda arvensis*, Kingfisher *Alcedo atthis*, Linnet *Linaria cannabina*, Little gull *Hydrocoloeus minutus*, House sparrow *Passer domesticus*, Mallard *Anas platyrhynchos*, Meadow pipit *Anthus pratensis*, Red Kite *Milvus milvus*, Red-throated Diver *Gavia stellata*, Red shank *Tringa tetanus*, Redstart

Phoenicurus phoenicurus, Reed Bunting *Emberiza schoeniclus*, Ring ouzel *Turdus torquatus*, Starling *Sturnus vulgaris*, Wheatear *Oenanthe Oenanthe*, White throat *Curruca communis* and Yellowhammer *Emberiza citronella.*

Table 7: Desktop Study Results, Protected and Notable Species Records Summary

Species	Designation	Date of Most Recent Record	Distance and Direction from Site
Bats			
Serotine *Eptesicus serotinus*	WCA sch5 NERC S.41	2014-2016	Two records, closest 1.2km south west
Natterer's Bat *Myotis nattereri*	WCA Sch5 NERC S.41	2014	1.7km north west
Alcathoe bat *Myotis alcathoe*	WCA Sch5 NERC S.41	2014	1.7km north west
Myotis species	WCA sch5 NERC S.41	2016	1.2km south west
Daubenton's *Myotis daubentonii*	WCA sch5 NERC S.41	2014	1.7km North-west
Brown Long-eared *Plecotus auritus*	WCA sch5 NERC S.41	2021	Two records, closest 1.1km north
Whiskered/Brandt's *Myotis mystacinus/brandtii*	WCA sch5 NERC S.41	2020	1.2m East
Noctule *Nyctalus noctula*	WCA sch5 NERC S.41	2014	1.7km north west
Pipistrelle species	WCA sch5 NERC S.41	2015	1.7km north east
Nathusius' pipistrelle *Pipistrellus nathusii*	WCA sch5 NERC S.41	2014	1.7km north west
Common pipistrelle *Pipistrellus pipistrellus*	WCA sch5 NERC S.41	2014-2016	Three records, closest 1.2km south west
Soprano pipistrelle *Pipistrellus pygmaeus*	WCA sch5 NERC S.41	2014-2016	Two records, closest 1.2km south west
Amphibians & Reptiles			
Common toad *Bufo bufo*	NERC S.41	2014	623m east
Common frog *Rana tempporaria*	WCA5	2015	940m west
Slow-worm *Anguis fragilis*	WCA sch5 NERC S.41	2017-2022	Four records, closest inside the site
Common lizard *Zootoca vivipara*	NERC S.41 WCA5	2017-2019	Two records, closest 275m east
Mammals (excluding bats)			

Species	Designation	Date of Most Recent Record	Distance and Direction from Site
European water vole *Arvicola amphibius*	NERC S.41 WCA5	2014-2015	Two records, 765m north
European hedgehog *Erinaceus europaeus*	NERC S.41	2015-2020	Three records, closest 640m south
Invertebrates			
Green-brindled crescent *Allophyes oxyacanthae*	NERC S.41	2021	41m north
Feathered gothic *Tholera decimalis*	NERC S.41	2021	35m north
Invasive Species			
Japanese Knotweed *Fallopia japonica*	WAC9	2018	Single record, 710m south

Field Survey

UKHab Survey

5.9 The locations of the habitats described below are illustrated in *Figure 3: UKHab Baseline Habitats Plan*. A full botanical species list is provided in *Appendix C*.

Hedgerows

5.10 There are 15 hedgerows present onsite, All of which are non-native hedgerows meaning they are not classed as important under the Habitat of Principal Importance NERC Act (2006) or the Wildlife and Landscape Criteria of Hedgerow REGS. The dominant species present in these hedgerows consisted of Japanese spindle *Euonymus japonicus*, Bramble *Rubus fruticosus*, Viburnum *Viburnum lantant* and Buddleia *Buddlejia*.

Trees

5.11 There are a total of 99 trees on site. They vary from large to small in size and from poor to good condition. 11 large (dbh 61-90cm), 23 medium (dbh 31-60cm) and 66 small-sized (dbh 7-30cm) trees were identified on-site. The trees included London plane, hybrid black poplar, holm oak, cherry, sycamore, hazel and ash trees. The trees were mainly planted for and managed for their aesthetic and amenity function; with some small trees being self-set. The trees within the grasslands all achieved Moderate or Good condition, while the trees in the carpark were only able to achieve Poor condition due to their confined location and impacts from human activities.

5.12 Individual trees are only classified if they are above 7cm in diameter, therefore some trees included within the Arboricultural Assessment are not recorded within the habitat plans; in addition, due to the way in which Arboricultural Assessments work some trees are included as groups, and these are reflected as individual trees under UKHab, leading to a difference of number of trees on-site across the reports.

Grassland

5.13 There are seven areas of modified grassland present across the Site with less than eight species per m^2. Predominant species in these areas include Daisy *Bellis perennis*, Self-heal

Prunella vulgaris, Rough meadow grass *Poa trivialis*, Perennial rye grass *lolium perenne*, Yorkshire Fog *Holcus lanatus* and Creeping buttercup *Ranunculus repens*. Five of grasslands are in moderate condition. The grassland in the northwest is in good condition due to the lack of physical damage and between six and eight species present. The grassland to the west of the site entrance is in poor condition due to its intensive management which has led to a short sward height, a low number of species and evidence of physical damage.

Introduced Shrub

5.14 There are small patches of introduced shrub present across the site, consisting of Japanese spindle *Euonymus japonicus*, *Hebe stricta*, Buddleia *Buddlejia* and Cotoneaster.

5.15 In accordance with Defra guidance, this habitat is not subject to a condition assessment.

Mixed Scrub

5.16 There are two areas of mixed scrub on site (adjacent grasslands G1 and G4), comprising Domestic Apple *Malus domestica*, Crab Apple *Malus sylvestris and* Holly *Ilex aquifolium*, the scrub was assessed as having poor condition due to being small areas which hasn't allowed for the development of features associated with good condition.

Ponds

5.17 There are two ponds present in the southern corner of the Site. P1 is approximately 25m x 6m, featuring species such as Waterlily *Nymphaea* in the pond itself and Wood avens *Geum urbanum*, Oxeye daisy *Leucanthemum vulgare* and Prickly sow thistle *Sochus asper* in the surrounding vegetation. P2 was approximately 8m x 4m and was very overgrown with vegetation. Species in the surrounding vegetation included Willowherb *Epilobium* spp., and Bramble *Rubus fruticosus*. Both ponds are in poor condition due to the lack of natural habitat surrounding the ponds and presence of non-native species in the ponds.

Built Environment

5.18 The remainder of the Site comprises hardstanding, footpaths and buildings.

5.19 In accordance with Defra guidance, this habitat is not subject to a condition assessment.

Biodiversity Net Gain

5.20 The baseline value of the site has been calculated using the Statutory Biodiversity Metric Tool. The baseline score for the site is 8.70 habitat units and 1.03 hedgerow units. A summary of the baseline habitats has been provided below.

Table 8: Summary of Baseline Habitats

Habitat Type	Condition	Distinctiveness	Required Action to Meet Trading Rules
Developed land; sealed surface	N/A	Very Low	Compensation not required
Introduced shrub	N/A	Low	Same distinctiveness or better habitat required

Habitat Type	Condition	Distinctiveness	Required Action to Meet Trading Rules
Modified Grassland	Moderate	Low	Same distinctiveness or better habitat required
Mixed Scrub	Poor	Medium	Same broad habitat or a higher distinctiveness habitat requires
Urban Tree	Good	Medium	Same broad habitat or a higher distinctiveness habitat requires
Urban Tree	Moderate	Medium	Same broad habitat or a higher distinctiveness habitat requires
Urban Tree	Poor	Medium	Same broad habitat or a higher distinctiveness habitat requires
Ponds (non-priority habitat)	Moderate	Medium	Same broad habitat or a higher distinctiveness habitat requires

Table 9: Summary of Baseline Hedgerows

Habitat Type	Condition	Distinctiveness	Required Action to Meet Trading Rules
Non-native and ornamental hedgerow	Poor	Very Low	Same distinctiveness band or better

Bats

Bat Roosting Potential

5.21 The assessment of the buildings for bat roost potential is summarised below:

Table 10: Building Description and Bat Roost Potential

Building	Description	Photo	Bat roost potential
Unit 5	Two storey commercial building. Metal cladding and windows across the entirety of building. Connected to Unit 6 via walkway. All external building structures were well sealed, resulting in no potential bat features were found on this building.		Negligible
Unit 6	Two storey -industrial building. Metal cladding and windows across the entirety of building. Same design as Unit 5. All external building structures were sealed, meaning no potential bat features were found on this building.		Negligible

Building	Description	Photo	Bat roost potential
Unit 7	Three storey – multi-level roof. Brick walls; missing mortar in places. Large wooden soffits; gaps underneath (between wall/ window and soffit box). Corner tiles and ridge tiles; had access points underneath due to design. Ridge tiles; lead flashing underneath with gaps providing access points. Air vents with missing slats; potential access to wall cavity behind.		High

Nocturnal Surveys

5.22 Three nocturnal emergence surveys were undertaken on Unit 7 in August and September 2024. During these surveys, ten NVA's were used to record all PRF's. Locations of the NVA's can be seen in *Figure 4*. There were low numbers of common pipistrelle detected during the surveys using the site for foraging and commuting and there were no bats recorded emerging or re-entering the building.

Habitat Suitability

5.23 Onsite habitats are limited to introduced shrubs, low level hedgerows and a limited number of trees which offer limited suitability as foraging habitat for bats. Furthermore, the area to the north of the Site is predominantly housing development, industrial or semi-natural environments and to the south is predominantly residential housing, providing limited commuting habitat directly connecting it to larger areas of green space.

5.24 None of the individual trees onsite had features suitable to support roosting bats.

Great Crested Newts

5.25 No records of GCN were returned from the data search. There was limited suitable terrestrial habitat for GCN on site due to the dominance of hardstanding and modified grassland providing very little foraging and resting habitat. The hedgerows provide some potential commuting and foraging habitat.

5.26 Two ornamental ponds (P1 & P2) were present within the southern extent of the site. A third large waterbody (P3) was located approximately 7m northeast of the site these locations ate shown on *Figure 5*. The HSI scores for the three ponds on site are summarised in *Table 11.*

Table 11: HSI scores and waterbody suitability

Waterbody	HSI Score	HSI Category	Predicted Presence
P1	0.65	Average	0.55
P2	0.47	Poor	0.3
P3	0.66	Average	0.55

eDNA Survey

5.27 Of the three waterbodies surveyed in 2024, all three returned negative results indicating likely GCN absence.

Breeding Birds

5.28 A total of ten bird species were recorded within the survey area. Of these, five appear on one or more of the following and are hereinafter referred to as 'notable' species.

- Schedule 1 of the Wildlife & Countryside Act 1981 (as amended)
- BoCC Red or Amber lists
- Section 41 of the NERC Act 2006
- LBAP for Sussex.

5.29 The distribution of the five notable species recorded is illustrated on *Figure 6*.

5.30 Of the ten species recorded during breeding bird survey; no species were recorded as confirmed breeders. One species was considered a probable breeder, Wren (*Trogolodytes trogolodytes)*, which is a BoCC Amber-listed species. The remaining nine species recorded were considered possible breeders (8) or non-breeders (1).

5.1 *Table 12* provides a summary of the notable bird species and their breeding status on site, a full list of species found on site is provided in *Appendix D*

Table 12: Notable Bird Species and Breeding Status

Species	**Legal/ Conservation status**	**Breeding Status†**	**No. of Individuals**	**Recent Status in Sussex**
Herring gull *Laurs argentatus*	Red list NERC S.41	Possible breeder - H	2	Very common resident; status uncertain as passage migrant and winter visitor.
Stock dove *Columba oenas*	Amber list	Non-breeder - UH	1	Common resident and possible winter visitor.
Wren *Troglodytes troglodytes*	Amber list	Probable breeder – A ,	3	Abundant resident.

Species	Legal/ Conservation status	Breeding Status†	No. of Individuals	Recent Status in Sussex
Woodpigeon *Columba palumbus*	Amber list	Possible breeder - H	2	Abundant resident and winter visitor.
Greenfinch *Carduelis chloris*	Red list	Possible breeder – H, S	1	Very common resident and possibly fairly common passage migrant and scarce winter visitor.

5.2 The habitats onsite, namely the hedgerows, mixed scrub and introduced shrubs provide suitable breeding and/or foraging habitat for an assemblage of common and widespread species including wren, blackbird *Turdus merula* and robin *Erithacus rubecula.* While the assemblage includes a number of notable species, these species are all fairly common to abundant in Sussex and the numbers recorded are all considered typical of the habitats present. The Site was therefore considered to be of no more than Local level importance for the generalist assemblage recorded.

Reptiles

5.3 The desk study shows limited numbers of reptiles within 1km of the site however one slow worm had been recorded onsite in 2022, close to the onsite ponds. Due to the limited extent and poor connectivity, the current habitats present are not thought to be suitable for a significant reptile population.

Preliminary Protect Species Assessment

5.4 The potential for the site to support other protected and notable species has been assessed based on the desktop study results, the habitats present onsite and their connectivity to suitable offsite habitats. The results of this assessment are summarised in *Table 13* which provides an assessment of the Likelihood of Presence only, not an assessment of suitability which is discussed in section 5 of this report where relevant.

Table 13: Preliminary Protected Species Assessment Results

Species/ Species Group	Relevant Legislation	Site Assessment	Likelihood of Presence
Badgers	PBA	No evidence of badger was observed during the walkover survey and no records of badgers were returned by SxBRC within the search area. Therefore badgers do not pose a constraint to the proposals.	Likely absent

Species/ Species Group	Relevant Legislation	Site Assessment	Likelihood of Presence
Hedgehog	NERC S.41	Prior to cutting management, onsite hedgerows and shrub supported some, albeit limited, suitability to provide foraging and shelter opportunities for hedgehog. The desk study records indicate that this species is present within the search area (albeit the closest record being almost 640m away and separated from the site by roads and residential development. Onsite habitat is however poorly connected to offsite areas of habitat and therefore the site suitability has been assessed as being low.	Low

6.0 DISCUSSION

6.1 The proposals have been assessed against the ecological baseline to review the potential impacts anticipated and to provide recommendations for mitigation, compensation and/or ecological enhancement where appropriate. This report aims to provide an impact assessment based on surveys undertaken and employing a precautionary approach. The assessment of impacts and recommendations for mitigation are based on the most up-to-date indicative proposals for the development (drawing ref: 12641-FPCR-ZZ-ZZ-DR-L-0001 issue P06).

6.2 Relevant legislation and policy for each species is discussed below where relevant and is summarised in *Appendix A*.

6.3 Through pre-application discussions it was agreed that a shadow Habitat Regulations Assessment is not required in respect of this proposed development.

Desk Study

Statutory Designated Sites

6.4 Due to the small-scale and commercial nature, the proposals will not lead to a significant negative effect on any of the internationally or nationally designated Sites within the search area. Although there are two waterbodies present on site these are not considered to be of a size that would support any significant population of bird species that the statutory sites are designated for.

Non-Statutory Designated Sites

6.5 There are no non-statutory sites within 1km of the site boundary. The proposals will have no significant impact on sites outside of this search area.

Biodiversity Net Gain

6.6 Biodiversity Net Gain (BNG) has been used to inform the habitat creation and enhancement proposals for the scheme and the resulting habitats will provide a betterment for local wildlife. Details of the BNG on site is found in the Biodiversity Net Gain Report (FPCR, 2025).

6.7 The habitat retention, enhancement and creation proposals highlighted within the report have all been inputted into the Statutory Biodiversity Metric. *Table 6* provides a summary of the headline results of the assessment completed for the proposals.

Table 5: Statutory Biodiversity Metric Headline Results

Baseline	Habitat Units	8.70
	Hedgerow Units	1.03
Post-Intervention	Habitat Units	6.56
	Hedgerow Units	2.21
Total Net Unit Change	Habitat Units	-2.14
	Hedgerow Units	+1.18
Total Net Percentage Change	Habitat Units	-24.60%
	Hedgerow Units	+115.03%

6.8 The current proposals will result in an overall loss of -2.14 habitat units on-site, largely due to the loss of individual trees from the Site.

6.9 The scheme will seek to deliver compensatory units off-site in order to achieve the mandatory 10% Net Gain in biodiversity units required by the Environment Act. It is noted that under current proposals, a minimum of 3.01 units will be required to achieve a 10% net gain.

6.10 The proposals will result in a net gain in hedgerow units, of +1.18 / +115.03%.

Habitat Trading

Hedgerows

6.11 The proposals have effectively compensated for the loss of predominantly non-native hedgerow on-site, through the creation of higher distinctiveness and better-quality hedgerows. This has led to a net gain in excess of 10% for hedgerows, and the proposals meet the Trading Rules.

Habitats

6.12 The proposals result in a net loss and fail the Trading Rules due to the loss of individual trees and scrub from the Site, which are a medium distinctiveness habitats; this is despite the planting of 55 individual trees and species-rich hedgerows with trees on-site.

6.13 The proposals cannot provide enough units to compensate for the loss of these habitats on-site, and therefore an off-site solution will be required to deliver these units.

Protected and/or Notable Species

6.14 Principal pieces of legislation protecting wild species are Part 1 of the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). Some species, for example badgers, also have their own protective legislation (Protection of Badger Act 1992). The impact that this legislation has on the Planning system is outlined in ODPM 06/2005 Government Circular: Biodiversity and Geological Conservation – Statutory obligations and their Impact within the Planning System.

6.15 In addition to protected species, there are those that are otherwise of conservation merit, such as Species of Principal Importance for the purpose of conserving biodiversity under NERC Act 2006. The implications that various identified species or those that are thought reasonably likely to occur may have for developmental design and programming considerations are outlined below.

6.16 Details on relevant legislation and policy for protected and notable species is provided in *Appendix A*.

Bats

6.17 No bats were recorded roosting onsite and therefore do not pose a constraint to the proposals.

6.18 Introduced shrub, ornamental hedgerows and a limited number of trees on site provide very limited suitability for foraging and commuting bats and their loss is similarly not considered to pose a constraint to the proposals.

6.19 To mitigate for changes to the parking area altering the lighting onsite, which could reduce the suitability of the site for some bat species, a sensitive lighting scheme will be implemented to reduce light spill onto nearby.

6.20 Bat boxes will be installed at various southerly aspects on retained trees to further increase the roosting opportunities onsite.

Birds

6.21 The hedgerows, mixed scrub and introduced shrub provide habitat for breeding birds. The majority of ornamental hedgerows will be lost to facilitate the carpark but the mixed scrub and introduced shrub areas will be retained.

6.22 As a result of the special protection afforded to breeding birds, where any removal of woody vegetation is necessary, it is recommended that this takes place outside of the bird breeding season (March to August inclusive) to minimise the risk of disturbance to breeding birds. If this is not possible, such vegetation will be checked prior to removal by a suitably experienced ecologist. If active nests are found, vegetation will be left untouched and suitably buffered from works until all birds have fledged.

6.23 New planting will include some native species to replace those specimens lost and provide foraging opportunities with berry-producing species.

6.24 A variety of bird boxes will be installed on retained trees to further increase the nesting opportunities onsite.

Reptiles

6.25 Desk search returned a single record of slow worm in 2022 within the habitat adjacent to the onsite ponds (P1 & P2). This habitat was limited in extent and suitability due to the managed nature of the site and surrounding urban environs. The remaining grassland was heavily managed and did not provide suitable reptile habitat.

6.26 The grassland around P1 and P2 will be retained, but to facilitate the removal of any surrounding landscaping a precautionary approach will be applied to this area, where reptiles will be assumed present and any habitat clearance will be undertaken via passive displacement exercise, under supervision of an ecologist.

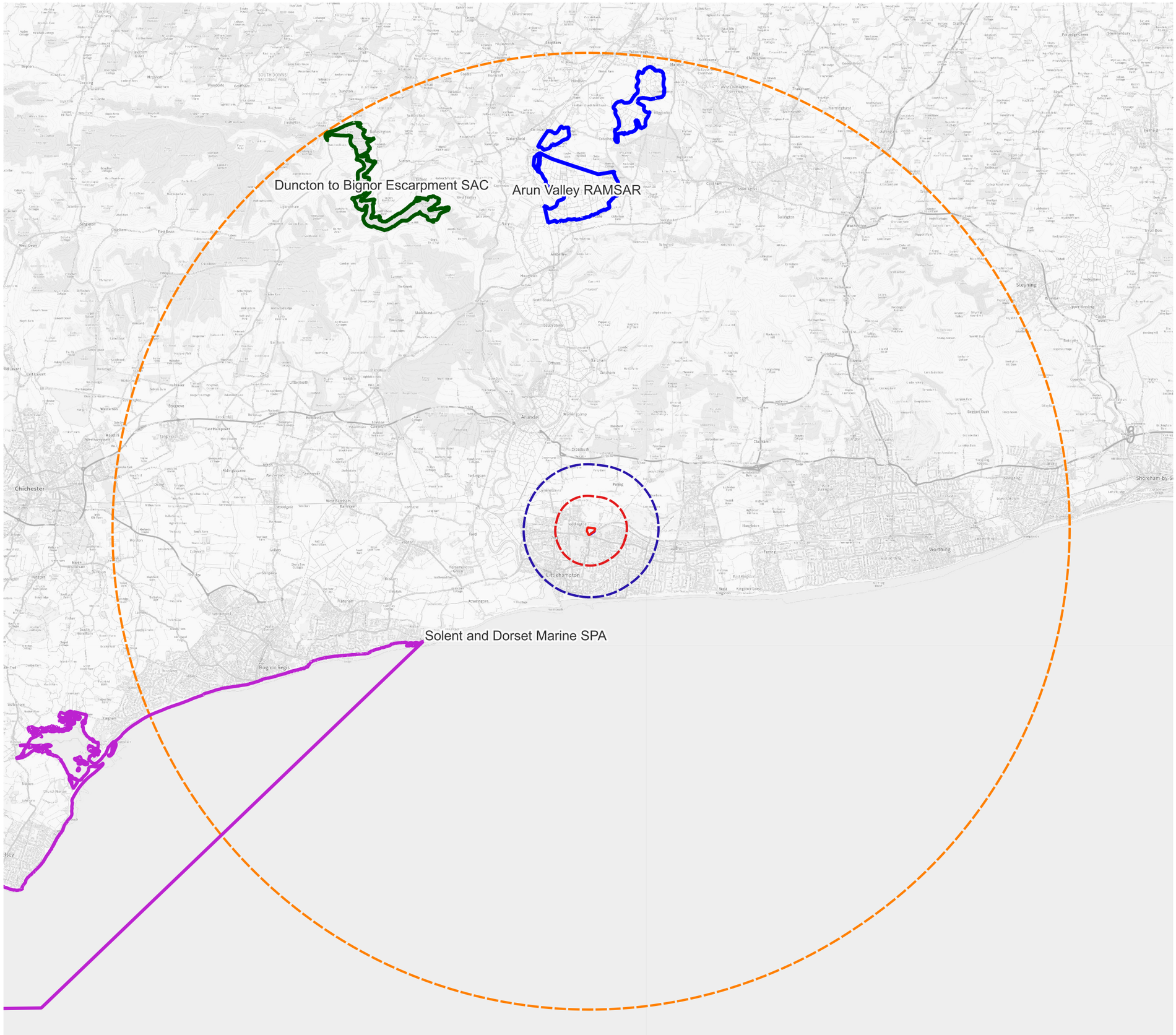
Badgers and Hedgehogs

6.27 Given the urban landscape that the Site is situated within there is some (albeit limited) potential for the Site to support these species.

6.28 To avoid any harm to these species, precautionary working are recommended during the construction phase of works. This include the following working practices:

- During construction any pipes greater than 250mm in diameter will be capped if they are left open overnight, thereby preventing species from becoming trapped;
- Any pits or trenches will similarly be covered overnight, or left with a suitable means of escape, e.g. a stout timber plank forming a ramp;
- During the construction phase, operations shall be restricted to daylight hours as far as practicable in order to minimise the potential for adverse impacts to species (and other nocturnal and crepuscular wildlife) through disturbance, and
- Construction offices, material compounds and security buildings will be located in appropriate locations away from retained habitats in order to reduce the potential for accidental damage to habitats or interruption to regularly used badger runs.

- All waste materials are to be appropriately stored, in particular domestic waste from construction site welfare units that may attract species. These should be stored in heavy duty bins with lids.



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0 3,500 7,000 m

Key

- Site Boundary
- Off-site Land
- 1km Buffer
- 2km Buffer
- 15km Buffer

Designated Sites

- Marine Special Protection Areas SPA
- Local Nature Reserves (LNR)
- Special Area of Conservation (SAC)
- RAMSAR Sites

date: 06/05/25

drwn/chkd: AC

client: **Hallway Properties Limited**

project: **Land at Norway Lane, Littlehampton**

title: **DESIGNATED SITES PLAN**

scale: 1:120,000 @ A3

number: **FIGURE 1**

rev: -

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0 500 1,000 m

Key

- Site Boundary
- Off-site Land
- 1km Buffer
- 2km Buffer

Protected/Notable Species

- Common Frog
- Common Lizard
- Common Toad
- European Water Vole
- Feathered Gothic
- Green-brindled Crescent
- Slow-worm
- West European Hedgehog
- Japanese Knotweed
- Alcathoe Bat
- Brown Long-eared Bat
- Common Pipistrelle
- Daubenton's Bat
- Myotis Bat
- Nathusius's Pipistrelle
- Natterer's Bat
- Noctule Bat
- Pipistrelle Bat species
- Serotine
- Soprano Pipistrelle
- Whiskered/Brandt's
- Cetti's Warbler
- Cuckoo
- Kestrel
- Kingfisher
- Little Grebe
- Mallard
- Mute Swan
- Skylark
- Tufted Duck

date: 06/05/25 | drwn/chkd: AC

client: **Hallway Properties Limited**

project: **Land at Norway Lane, Littlehampton**

title: **PROTECTED SPECIES PLAN** | scale: 1:17,000 @ A3

number: **FIGURE 2** | rev: -

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