

Ecological Impact Assessment
Sefter Farm, Pagham Road, Bognor Regis PO21 3PX
March 2025
Client: Barfoots of Botley
Proposed Development: Warehouse Extension, New Hardstanding, and Reduction of Reservoir.

Quality Assurance		
Report date:	Version:	Author:
28 th March 2025	1	Emily Luck, BSc (Hons), MCIEEM, MRSB
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1. Executive Summary

Site Details
- Sefter Farm, Pagham Road, Bognor Regis PO21 3PX - Central grid reference: SZ89209956
Scope of Works
Imprint Ecology was commissioned by Barfoots of Botley to undertake an Ecological Impact Assessment on a parcel of land at Sefter Farm. The proposed development is for a warehouse extension, new hardstanding, and reduction of a reservoir.
Key Ecological Constraints
Legal protection is afforded to particular habitats, species and designated sites. The legislation, and the habitats and species listed, vary between the different jurisdictions.
Baseline Ecological Conditions
- The site comprises largely low-value habitats including hardstanding, modified grassland, and artificial waterbodies, with patches of mixed and bramble scrub. - No protected species or significant ecological constraints were recorded on-site; however, low use by foraging hedgehogs, reptiles, amphibians, badgers, foraging and commuting bats and nesting birds is anticipated. - The artificial waterbodies and ditches are unsuitable for supporting water voles, otters, or breeding GCN. - The packhouse has negligible suitability for roosting bats.
Key Impacts and Mitigation Measures
- No significant impacts on designated sites are anticipated. Potential effects from dust, soil compaction, and pollutants during construction will be mitigated through adherence to best practice measures. - There is a very low risk to reptiles and amphibians, and so a Precautionary Working Method Statement (PWMS) has been proposed. - Vegetation clearance will be timed outside the nesting bird season where possible to avoid delays, as the mixed scrub has high suitability for nesting birds and may host active nests during March–August. - Lighting will be avoided across the site. Any impacts upon bats from lighting in future will be avoided through the implementation of a bat-sensitive lighting strategy.
Compensation and Enhancement Recommendations
Enhancements for wildlife on site have been made in line with Arun Local Plan Policy ENV DM5.

2. Introduction

2.1 Background and Proposed Development

Imprint Ecology was commissioned by Barfoots of Botley to undertake a Preliminary Ecological Appraisal and Ecological Impact Assessment (EclA) at Sefter Farm, Pagham Road, Bognor Regis PO21 3PX, hereafter referred to as ‘the site’. It is located around central OS grid reference: SZ89209956. The proposed development is for a warehouse extension, new hardstanding, and reduction of a reservoir.

2.2 Personnel

This assessment has been carried out by Emily Luck, BSc (Hons), MCIEEM, MRSB, Senior Lead Ecologist and Director of Imprint Ecology. As a Full member of the Royal Society of Biology (RSB) and a Full member of the Chartered Institute of Ecology and Environmental Management (CIEEM), Emily upholds the highest standards of professional ecological practice and is bound by their respective Codes of Professional Conduct. Emily holds a Natural England Level 2 Class Licence for bats (Registration number: 2024-12034-CL18-BAT).

2.3 Purpose of this Ecological Impact Assessment Report

This report is valid for a maximum of 24 months from the date of issue and presents the findings of ecological surveys conducted on-site. Its purpose is to identify and describe all potentially significant ecological effects associated with the proposed development, set out the mitigation measures required by law to protect biodiversity, and outline how these measures will or could be secured. Additionally, the report provides an assessment of the significance of any residual effects, identifies appropriate enhancement measures, and sets out the requirements for any post-construction monitoring, if necessary.

2.4 Site Description

The site is accessed off Pagham Road and forms part of the wider Sefter Farm complex, located near the village of Pagham, to the northwest of Bognor Regis. The red line boundary does not encompass all land owned and managed by the applicant; the area within the red line boundary comprises approximately 2.65 hectares (ha). The immediate landscape is characterised by large-scale horticultural operations including extensive arable land, and infrastructure associated with agricultural processing. The wider environment includes additional managed farmland, field margins, large residential housing areas, hedgerows, and occasional wet ditch systems. Figure 2.1 illustrates the site’s location, and Figure 2.2 provides an aerial overview.

Figure 2.1 – Location © OpenStreetMap is open data, licensed under the Open Data Commons Open Database License (ODbL) by the OpenStreetMap Foundation (OSMF).

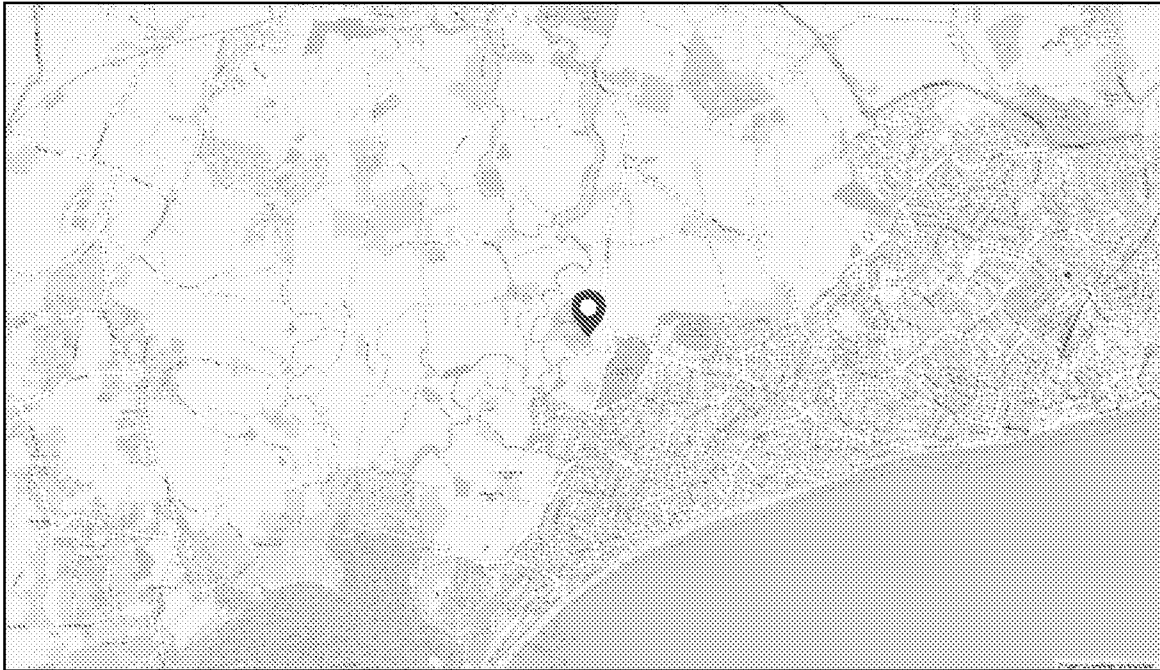


Figure 2.2 – Location aerial view © Google Earth 2025. Illustrative outline of site application boundary (red).



3. Legislation and Planning Policies

3.1 Policy

3.1.1 National Planning Policy

The latest National Planning Policy Framework (NPPF, 2024) was published in December 2024. Paragraph 187 states that planning policies and decisions must contribute to and enhance biodiversity and the natural environment by:

- Protecting and enhancing valued landscapes, biodiversity sites, geological features, and soils in line with statutory designations.
- Recognising the intrinsic character and beauty of the countryside, including the benefits of trees, woodlands, and agricultural land.
- Maintaining the character of undeveloped coastal areas while improving public access where appropriate.
- Minimising impacts on biodiversity and delivering net gains, including the establishment of resilient ecological networks and features supporting priority species such as swifts, bats, and hedgehogs.
- Preventing environmental harm from soil, air, water, and noise pollution, as well as land instability.
- Improving local environmental conditions, including air and water quality, informed by relevant policies such as river basin management plans.
- Remediating degraded, contaminated, or unstable land to enhance ecological value.

Paragraph 193 states that local planning authorities must apply the following principles when determining planning applications:

- Avoid significant harm to biodiversity where possible; if unavoidable, harm must be mitigated or compensated for, or planning permission should be refused.
- Development that affects Sites of Special Scientific Interest (SSSI) should not be permitted unless benefits clearly outweigh potential harm.
- Loss or deterioration of irreplaceable habitats (e.g., ancient woodland, veteran trees) should be refused unless there are exceptional reasons and a suitable compensation strategy.
- Development that enhances biodiversity should be supported, particularly where it secures measurable net gains or improves public access to nature.

In addition to the NPPF, Circular 06/2005: Biodiversity and Geological Conservation says, *“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.”*

Circular 06/2005 also provides statutory direction on biodiversity protection within the planning system. It clarifies legal obligations under the Wildlife and Countryside Act 1981, the Conservation of Habitats and Species Regulations 2017, and other key legislation. It outlines:

- The importance of ecological surveys and assessments in development proposals.
- The duty of local authorities to consider biodiversity in planning decisions, ensuring compliance with UK and European laws.
- Requirements for the mitigation hierarchy, ensuring avoidance, mitigation, or compensation for biodiversity impacts.
- The need for protected species licences where development affects legally protected species.

3.1.2 Local Planning Policy

Policy ENV DM5 – Development and Biodiversity (Arun Local Plan 2018-2031) states that:

“Development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on-site, in accordance with Policy ENV DM5 of the Arun Local Plan 2018-2031. Proposals shall incorporate elements of biodiversity, including green walls, green roofs, bat and bird boxes, as well as landscape features that minimise 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, reconnecting isolated sites and facilitating species movement in line with Arun Local Plan objectives.

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 measures incorporated into the development scheme to avoid the loss of the species. This includes consideration of any direct or indirect impacts within the application site or any areas outside of the site that may be indirectly affected by the proposals.

All surveys shall be carried out at an appropriate time of year by a qualified and, where appropriate, suitably licensed person, ensuring compliance with Arun Local Plan biodiversity policies.

All developments shall have regard to Natural England's standing advice for protected species, in line with Policy ENV DM5 and the wider Arun Local Plan 2018-2031 requirements."

3.2 Conservation Legislation

Legislation for UK protected and non-native species is outlined in Table 3.1.

Table 3.1: Legislation of UK Protected/Priority species.

Species	Legislation
Badgers	Badgers are protected under the Protection of Badgers Act 1992, which prohibits the wilful killing, injuring, or taking of a badger and the interference with a badger sett. This includes activities such as destroying setts or obstructing access to them when in current use. Additionally, under the Wildlife and Countryside Act 1981 (as amended), badgers are protected from being harmed by certain prohibited traps and poisons.
Bats	British bats are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended), which classifies them as European Protected Species (EPS). Additional protection is provided by the Countryside and Rights of Way (CROW) Act 2000, the Bonn Convention (Agreement on Bats in Europe), and the Bern Convention. Seven bat species are also listed under Section 41 of the NERC Act 2006 as priority species for biodiversity. It is a criminal offence to kill, injure, capture, or disturb bats, damage or destroy a roost, or obstruct access to roosting sites. Bat roosts are protected regardless of whether bats are present at the time, as bats often return to the same roost annually. If a proposed development risks disturbing bats or their roosts, a European Protected Species Mitigation Licence (EPSL) must be obtained from Natural England. This licence permits works subject to approved mitigation measures to safeguard bats. The Natural Environment and Rural Communities (NERC) Act 2006 requires due consideration of biodiversity and enhancement opportunities during development planning.
Dormice	Hazel dormice are fully protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). This protection makes it an offence to intentionally kill, injure, or capture dormice, as well as to disturb them in their places of rest or damage, obstruct or destroy their breeding or resting sites. Due to their reliance on diverse, connected habitats such

	as woodland, hedgerows, and scrub, dormice are a priority species under Section 41 of the NERC Act 2006, meaning they must be considered in the planning process.
Great crested newts	Great crested newts (GCN) are strictly protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). It is an offence to capture, injure, kill, or disturb GCNs, as well as to damage or destroy their breeding or resting places. Licences from Natural England are required for activities affecting GCN or their habitats.
Hedgehogs	Hedgehogs are listed as a priority species under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Hedgehogs are particularly vulnerable during the winter months when they are in hibernation, and during spring when building and sheltering in nests with dependent young.
Invasive Non-Native Species (INNS)	Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) prohibits the planting, release, or causing the spread of invasive non-native species such as Japanese knotweed, Himalayan balsam, and giant hogweed. Landowners have a duty to manage these species to prevent their spread, and strict controls apply to their disposal.
Invertebrates	Development must comply with legal protections for invertebrates, including those listed as European Protected Species (EPS) under the Conservation of Habitats and Species Regulations 2017 (as amended), such as large blue butterflies, Fisher's estuarine moths, and little ramshorn whirlpool snails. It is illegal to kill, injure, disturb, or destroy their breeding or resting sites, even when unoccupied. These species are also protected under the Wildlife and Countryside Act 1981 (as amended), making it an offence to recklessly disturb or obstruct access to their shelters. Many other invertebrates are protected under Schedule 5 of the Act, while Section 41 of the NERC Act 2006 highlights rare species requiring conservation consideration during planning.
Nesting birds	Nesting birds are protected under several key pieces of legislation to prevent their disturbance or harm, particularly during the breeding season. The Wildlife and Countryside Act 1981 (as amended) makes it illegal to intentionally kill, injure, or take any wild bird, and to damage or destroy the nest of any wild bird while it is in use or being built. Some species, listed under Schedule 1 of the Act, receive additional protection. The Conservation of Habitats and Species Regulations 2017 (as amended) further implements protections for bird species considered of European importance, particularly through the designation of Special Protection Areas (SPAs). The term "nesting" encompasses all stages from adults building a nest or gathering nest materials to the point when chicks have fledged. To avoid disturbing nesting birds, works that could impact nests should generally be avoided from March to August inclusive. However, precaution should be given during February when some bird species can begin nesting, especially in milder conditions. Disturbance during these

	stages, such as interfering with eggs or nests with chicks, can cause significant stress or even nest abandonment, resulting in the failure of the breeding attempt
Other mammals	The Wild Mammals (Protection) Act 1996 protects all wild mammals, including ubiquitous species like mice, voles, as well as foxes, and rabbits, from intentional harm or preventable distress and suffering.
Otters	Otters are fully protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). It is illegal to deliberately capture, kill, or disturb otters, or to damage or destroy their holts or resting places.
Reptiles	Widespread reptiles, such as slow worms and common lizards, are protected under the Wildlife and Countryside Act 1981 (as amended). This legislation makes it an offence to intentionally kill, injure, or take these reptiles. Additionally, they are listed as priority species under Section 41 of the NERC Act 2006, requiring public bodies to consider their conservation. While these reptiles are not protected from habitat disturbance, developers must take reasonable steps to avoid direct harm during activities such as site clearance.
Water voles	Water voles are protected under the Wildlife and Countryside Act 1981 (as amended), making it illegal to intentionally kill, injure, or take water voles, or to damage, destroy, or obstruct access to their burrows.

4. Methods

4.1 Desk Study

4.1.1 Biological database searches

A desk study on 28th February 2025 involved reviewing online geographical databases and mapping tools to assess the site's proximity to key ecological features, including granted EPSLs, designated sites, priority habitats, and protected habitats, within a 1km radius. A data search from the local biodiversity records centre was not obtained, as it was deemed disproportionate and unlikely to alter the assessment outcome. The following resources were used during the study:

- Google Earth Pro Satellite Imagery
- LandApp by DigitalLandSolutions Ltd
- Multi-Agency Geographic Information for the Countryside (MAGIC)
- Ordnance Survey (OS) Explorer (1:25,000 scale)

4.2 Preliminary Ecological Appraisal

4.2.1 UKHab Habitat Assessment

The site's habitats were assessed on 28th February 2025 following the UK Habitat Classification (UKHab) system (Version 2.0). The survey involved a systematic site walkover to identify, classify, and map all habitats present. Pre-survey preparation included a review of existing ecological data, aerial imagery, and designated site information to establish a baseline and inform the survey strategy. The on-site field survey recorded habitat features, vegetation types, and management practices. Vegetation communities were assessed against the UKHab Primary Habitat Hierarchy, with dominant species noted and habitats categorised using primary codes. Secondary UKHab codes were applied where relevant to provide additional detail, such as habitat modifications or land-use context. Habitat features were mapped as polygons, lines, or points with precise spatial references. All species referenced follow standard UK common names, and Latin names can be provided upon request for clarification if required.

4.2.2 Badgers

Any grassland, woodland, scrub, and hedgerow habitats within the site were searched for signs of badger activity, including setts, pathways, foraging pits, latrines, and hairs snagged on fences or vegetation. Particular attention was given to banks and woodland edges.

4.2.3 Bats

A comprehensive survey of buildings, trees, and surrounding habitats was undertaken across the site to evaluate the presence of suitable features for roosting, foraging, and commuting bats. Equipment used included a 20,000-lumen LED torch, 8x42 binoculars, telescopic ladders, an inspection mirror, and a camera. Potential Roost Features (PRFs) - specific features within buildings, trees, or other structures that could provide shelter for bats – were recorded. These include cracks, crevices, joints, cavities, lifted roof tiles or weatherboarding, or loose bark on a tree. A PRF can take the form of any crevice or cavity in a building, tree or other structure that offers space, protection, and appropriate conditions for bat roosting. Evidence of bat presence, such as droppings, feeding remains (e.g., moth wings), urine stains, grease marks, lack of cobwebbing, or bats themselves, was recorded. Surrounding habitats were also assessed for their suitability to support commuting and foraging bats, focusing on features such as hedgerows, treelines, rivers, and woodland edges. Trees were surveyed for PRFs, including rot holes, cracks, split limbs, cavities, or ivy cover that could serve as roosting sites. Structures were classified as having confirmed roosts, or as high, moderate, low, negligible, or no suitability based on their physical characteristics and surrounding habitat quality following BCT guidelines (Collins, 2023).

4.2.4 Dormice

Woodland, hedgerows, and scrub habitats were inspected for their potential to support dormice. Focus was given to any dense, species-rich hedgerows and areas with abundant food sources such as hazel, bramble, and honeysuckle. Any signs of dormouse activity, including characteristic gnawed hazelnuts (nuts with clean, smooth inner surfaces with a neat circular opening) or woven dormouse nests, were recorded.

4.2.5 Great Crested Newts (GCN)

Where present, ponds and other waterbodies on or near the site were assessed for their suitability to support GCN based on criteria such as size, depth, presence of aquatic vegetation, absence of fish, and shading. Terrestrial habitats such as grassland, scrub, and woodpiles were examined for sheltering and foraging potential. Signs of GCN such as GCN eggs, efts, live or dead specimens were recorded.

4.2.6 Hedgehogs

Scrub, hedgerows, and grassland within the site were searched for hedgehog tracks, droppings, and nests. Habitat connectivity and the availability of hibernation-sites, such as piles of logs or leaves, were also recorded.

4.2.7 Invasive Non-Native Species (INNS)

The site was surveyed for invasive non-native species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), including Japanese knotweed, Himalayan balsam, and giant hogweed.

4.2.8 Nesting Birds

Habitats such as trees, hedgerows, scrub, grassland, and buildings were inspected for evidence of nesting birds, including nests, droppings, eggshells, or feathers. Suitability for breeding, foraging, and overwintering birds was assessed, and particular attention was paid to features likely to support species of conservation concern, such as holes in trees or buildings and dense scrub.

4.2.9 Otters

Rivers, streams, and other waterbodies where present within the site were assessed for signs of otters, including spraints (droppings often left on rocks or logs), footprints, slides, and holts. Riparian habitat quality, connectivity, and prey availability were also recorded where present.

4.2.10 Reptiles

Habitats within the site, including grassland, scrub, hedgerow bases and sheltered, sunny spots were assessed for their suitability to support widespread reptile species by providing basking, breeding, foraging, and hibernation opportunities. Any materials resting on the ground, such as wood, corrugated iron, or other debris (referred to as refugia), were lifted to check for sheltering reptiles.

4.2.11 Water Voles

Watercourses, ditches, and ponds where present within the site were searched for water vole signs, including burrows in banks, latrines (piles of droppings), feeding remains, and footprints in soft mud. The suitability of aquatic habitats was evaluated based on water depth, bank vegetation, and the presence of suitable burrowing substrates.

4.3 Limitations and Constraints

The survey was undertaken outside the optimal botanical survey season. However, gardens and hedgerows among other common habitat types were easily identifiable. Additionally, data from previous 2023 surveys was available to confirm the site's continued management style which remains unchanged. No significant constraints were encountered during the surveys. While

some species may not have been detectable at the time, the habitat assessment considered their potential to support species throughout the year, even in the absence of direct evidence.

4.4 Ecological Impact Assessment

In accordance with the Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2018), the methodology used to assess the potential impacts of the proposed development follows a structured approach. Initially, all important ecological features identified during the baseline surveys are evaluated based on their geographic level of importance, whether that be at an international, national, regional, county, or site level. This ensures that the assessment focuses on the features that are most vulnerable or critical to the local and wider ecological landscape.

The impacts are then characterised by considering their magnitude (the scale of the effect), extent (the area affected), duration (short-, medium-, or long-term), reversibility (whether the impact is permanent or temporary), and timing (taking into account seasonal factors such as breeding or migration periods). Using this information, the significance of the impacts is assessed by combining the importance of the ecological feature with the scale and likelihood of the impact. This determines whether the impact is significant in terms of its potential to affect conservation status or ecological function.

The assessment follows the CIEEM mitigation hierarchy, aiming first to avoid impacts through design alterations, then mitigating impacts that cannot be avoided, and finally compensating for any residual impacts where avoidance or mitigation is not possible. Residual impacts are those that remain after mitigation measures are applied, and their significance is evaluated to ensure that the overall ecological impact is minimised. Additionally, cumulative impacts from other nearby developments are considered to provide a comprehensive understanding of the wider ecological effects.

5. Baseline Ecological Conditions

5.1 Designated Sites

There are no designated sites within 1km of the site.

5.2 Habitats

5.2.1 Desk Study

No priority or protected habitats lie within or directly adjacent to the site. Priority/protected habitats present within 1km are as follows:

- Coastal and Floodplain Grazing Marsh

5.2.2 Site Assessment

The site consists of the following habitats:

u1b – developed land; sealed surface

Areas of sealed surface are present around the site as concrete and tarmac hardstanding used for vehicle access, parking, and servicing around buildings.

u1b5 – buildings

The site includes a large modern agricultural building (packhouse), constructed with a steel portal frame and clad in profiled metal sheeting. The roof and elevations are formed from corrugated steel panels. External gantries and staircases, formed of galvanised steel, provide access to upper levels and machinery.

u1c – artificial unvegetated, unsealed surface

A small area of bare ground in the form of a compacted earth or gravel track is located south of the access road. This is used for vehicle access and movement around the site and lacks any established vegetation.

h3d – bramble scrub

Patches of bramble dominate small areas of scrub at the site margins, particularly adjacent to larger areas of mixed scrub.

h3h – mixed scrub

Areas of mixed scrub are located primarily on the bund surrounding the artificial waterbodies. This habitat includes semi-mature stands of hazel, goat willow, blackthorn, and hawthorn. The scrub is gappy in places and no veteran or ancient specimens are present.

c1c – cereal crops

Within the red line boundary, to the east of the site, is a small area of cultivated land. This field forms part of the active agricultural operation and has limited ecological value due to intensive management.

g4 – modified grassland

Modified grassland is present in various locations across the site, primarily along access routes and around buildings. These grassed areas are subject to frequent mowing, resulting in a species-poor sward dominated by common grasses such as rye-grass. Other species less common in the sward are: creeping buttercup, daisy, self-heal, white clover, and broadleaved dock.

r1 – standing open water and canals

Two large artificial waterbodies are present on site. While they resemble reservoirs in scale, they do not meet the UKHab definition of a reservoir, that is: “*an artificial waterbody created by a dam for public water supply or irrigation*”. These reservoirs are lined and devoid of aquatic vegetation or habitat features. They are mapped as r1 – standing open water and canals and as ornamental waterbodies within the BNG metric to ensure the most appropriate habitat distinctiveness level and to avoid overvaluing their biodiversity potential. The waterbodies are considered to have negligible ecological value due to their absence of natural features.

In addition to the waterbodies, two drainage ditches are present on site. One is a shallow, slow-flowing channel with abundant willow growth, and patches of a green algae. The second ditch is engineered with regularly mown grassland margins, and no vegetation structure. This ditch's banks are heavily disturbed and support numerous rat burrows.

Photo 1: View from southeast looking north.

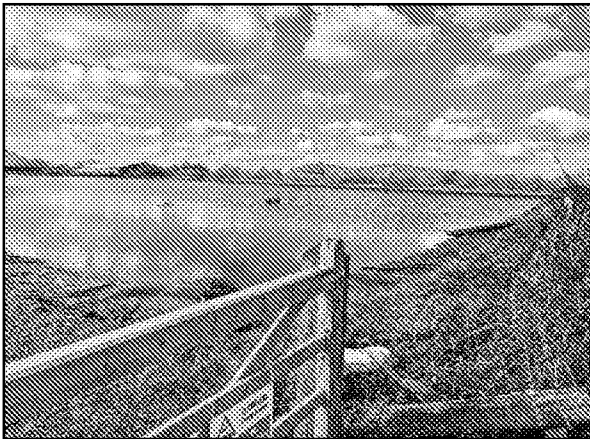


Photo 2: View from southeast looking west.

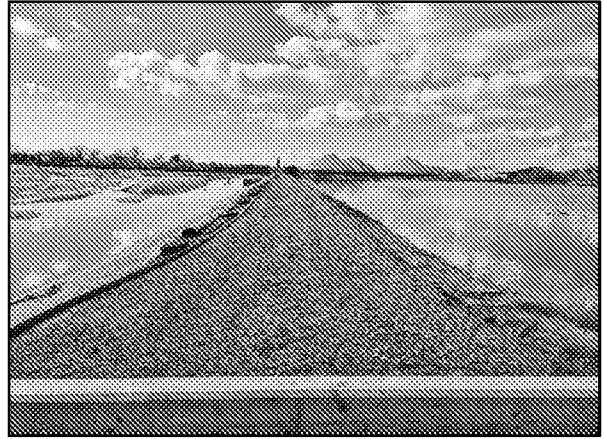


Photo 3: Bramble scrub



Photo 4: Bramble scrub and mixed scrub



Photo 5: Ditch along east



Photo 6: Ditch along north of scrub



Photo 7: Southeast of access road.



Photo 8: Southeast corner of grassland.



Photo 9: Mixed scrub and grassland.

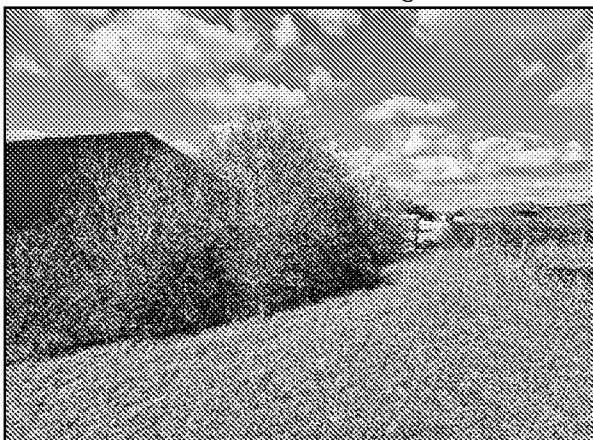


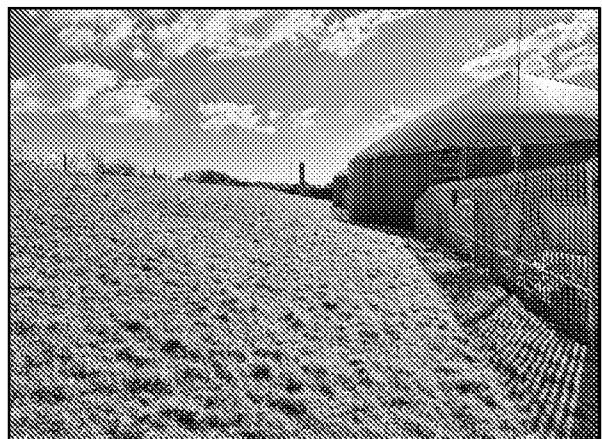
Photo 10: Mixed scrub and grassland.



Photo 11: Mixed scrub behind fence. Reservoir lining beyond.



Photo 12: Grassland on western edge of reservoir.



5.3 Protected Species Assessment

5.3.1 Badgers

There are no setts present within the red line boundary, and no suitable areas of undisturbed ground or natural cover offering shelter or sett-building opportunities. One mammal track was observed leading south from the site, and some evidence of feeding activity was noted in the form of nibbled maize. Known setts are present elsewhere on the wider farm, beyond the survey area. However, it is considered unlikely that badgers regularly cross the hardstanding or utilise the reservoir areas within the site application boundary due to the lack of cover and high levels of disturbance. While occasional foraging may occur on the grassland and scrub, the site is not considered to be significant for badgers. Precautionary mitigation to protect reptiles and GCN will also protect badgers.

5.3.2 Bats

The packhouse building is a large, modern, steel-framed structure clad in profiled metal sheeting, with no roof voids, gaps, or crevices suitable for roosting bats. The materials and construction type do not offer thermally stable or sheltered roosting conditions. In addition, the structure is subject to high levels of human activity, artificial lighting, and noise associated with its operational use, all of which reduce its suitability for bats. The building is considered to have negligible suitability for roosting bats.

Foraging and commuting bats may use the mixed scrub habitats on-site as a sheltered corridor. However, this habitat is gappy, and the site application area is considered largely unsuitable for foraging and commuting bats when compared to the surrounding landscape. The red line boundary includes extensive areas of hardstanding, buildings, and artificial waterbodies with unvegetated banks. The wider environment contains a more complex and connected network of habitats, including hedgerows, field margins, and ditches associated with arable and pasture fields which bats may favour over the site itself.

5.3.3 Great crested newts (GCN)

There are four ponds within 500m of the site, none of which are within 250m. No EPSLs for GCN have been granted within 1km of the site. There are no aquatic habitats present on-site that could support breeding GCNs and as the reservoirs on-site are devoid of vegetation and shelter, it was not deemed necessary to undertake Habitat Suitability Index (HSI) calculations of the waterbodies. While GCN are unlikely to rely on the site for their aquatic phases, occasional commuting individuals may pass through the grassland and scrub on-site. No further surveys are

required, but a Precautionary Working Method Statement (PWMS) for GCN and reptiles is recommended. Amphibian presence on-site is expected to be low and occasional, with individuals more likely to shelter and move through the site rather than use it as a key habitat.

5.3.4 Hazel Dormice

The habitats on-site are closely managed and lack suitable foraging, nesting, or hibernation opportunities for hazel dormice. There is no continuous arboreal connectivity across the site, and no significant accumulation of leaf litter or dense thickets that would typically provide adequate, connected shelter or nesting sites. The scrub present is limited in extent, relatively open, and isolated from any broader network of suitable woodland or hedgerow habitat. Hazel dormice are therefore not considered further in this assessment.

5.3.5 Hedgehogs

The site may provide suitable foraging and shelter opportunities for hedgehogs. The scrub offers cover for nesting and daytime refuge. Although the site lacks ideal hibernation features such as extensive leaf litter piles or dense undergrowth, it is likely that hedgehogs occasionally pass through, using the site as part of their commuting and foraging routes.

5.3.6 Invertebrates

The site is generally of low value to invertebrates due to its limited plant species diversity, frequent management, and lack of key structural features such as deadwood, bare ground, or varied sward height. While small numbers of generalist pollinators may be present during flowering periods, the site lacks the habitat complexity required to support a broader range of invertebrate species, including protected species like stag beetles.

The mixed scrub areas offer some localised value by providing shelter, overwintering sites, and a degree of structural diversity through leaf litter, woody stems, and shaded microhabitats. However, these areas are relatively isolated and limited in extent, and overall, the site is not considered likely to support notable or protected invertebrate populations.

5.3.7 Nesting Birds

The mixed scrub on-site provides suitable opportunities for nesting birds, offering cover, shelter, and structure for species such as blackbird, robin, wren, and dunnock. This habitat type supports both low and mid-level nesting and may also provide a foraging resource during the breeding season. While the scrub is relatively limited and somewhat fragmented, it remains the most

ecologically valuable area of the site for birds. The artificial waterbodies do not provide any shelter for nesting water birds or edible vegetation for waterfowl.

5.3.8 Reptiles

The site is considered to have very low suitability for reptiles. The grassland is regularly managed and closely mown, providing limited cover, basking opportunities, or foraging potential. Hardstanding and artificial waterbodies offer no suitable habitat, and the shallow drainage ditches are heavily disturbed and lack structural complexity. The mixed scrub offers some value with the potential for basking, foraging, or hibernation in root systems or leaf litter. While the site may occasionally be used by individual reptiles passing through or sheltering temporarily, it does not offer sufficient habitat to support a resident population. Reptile presence is therefore expected to be low and incidental.

No further surveys are considered necessary. However, a Precautionary Working Method Statement (PWMS) covering both reptiles and GCN is recommended to minimise the risk of harm during vegetation clearance and ground works.

5.3.9 Other Protected Species

The watercourses on site are considered unsuitable for supporting water voles or otters. The ditches are narrow, shallow, and heavily managed with limited vegetation structure. The banks are closely mown and show signs of disturbance, reducing cover and shelter opportunities. While one ditch contains some willow growth, it is narrow, shaded, and lacks the dense herbaceous vegetation typically favoured by water voles for burrowing and foraging. There is also no evidence of holts, couches, or spraint associated with otters, and the waterbodies on-site are artificial, too small and heavily disturbed, offering no suitable resting places, foraging opportunities, or access to natural riparian corridors. No other protected species were identified or considered necessary to assess during the site walkover and desktop review.

6. Impact Assessment and Mitigation

This section outlines the potential impacts of the proposed development on each relevant ecological feature identified in Section 5. The assessment considers all phases of the development, including but not limited to construction, operation, restoration, and decommission. Each impact is carefully described and justified, considering the scale, duration, and nature of the effect on the ecological receptors.

Mitigation measures are clearly presented to demonstrate how significant impacts can be avoided or reduced, following the CIEEM mitigation hierarchy (2018). Any residual impacts, after mitigation has been applied, are assessed to ensure their significance is minimised and fully accounted for in the overall ecological assessment.

6.1 Designated Sites

Potential impacts

None are anticipated.

Mitigation measures

None required.

Significance of residual effects

There will be no residual effects.

6.2 Habitats

Potential impacts

Dust generated by the construction phase of the new extension and new hard surfacing may settle on surrounding vegetation which can affect plant health. Construction materials, fuel, and chemicals may introduce pollutants into the soil. Heavy machinery may compact soil, making it less hospitable for plant growth. These impacts are related to the habitats on-site and are not anticipated to impact wider habitats nor any protected/priority habitats.

Mitigation measures

- All construction works will be undertaken in accordance with best practice guidance to minimise impacts from dust, noise, vibration, and emissions.
- Dust suppression measures, such as damping down exposed dusty surfaces and stockpiles during dry or windy conditions, will be implemented as required.

- Noise and vibration will be minimised through the use of well-maintained plant, avoidance of excessive idling, and timing of noisy works to minimise disturbance.
- Contractor vehicles will remain on existing areas of hardstanding or gravel wherever possible. Where access across grassland or softer ground is necessary, temporary trackways or ground protection mats will be used to reduce compaction and habitat damage.
- Materials, fuels, and chemicals will be stored securely away from drains and watercourses, with appropriate containment measures (e.g. bunded containers).
- A spill response kit will always be kept on site, and operatives will be briefed on emergency procedures in the event of a spill or pollution incident.

Significance of residual effects

With mitigation measures in place, there will be no residual effects.

6.3 Protected Species

6.3.1 Bats

Potential impacts

There is a risk of disrupting bat flightlines if external lighting at night is installed.

Mitigation measures

- Unnecessary illumination will be avoided wherever possible. Artificial Light At Night (ALAN) has significant negative effects on bats, invertebrates, and other nocturnal wildlife by disrupting natural foraging and commuting patterns. In some cases, installing ALAN near to bat habitat or a bat roost can cause bats to abandon their roosts which may constitute a breach of legislation.

If lighting cannot be avoided, it will be kept to an absolute minimum and designed to follow a sensitive lighting scheme in line with the Institution of Lighting Professionals (ILP) Guidance Note 08/23 (2023).

To minimise the impacts of ALAN on bats and other wildlife, the following measures will be implemented:

- Motion-activated lighting will be used instead of continuous illumination, with short timers to reduce use. Timers will be set for a 1–2-minute delay after the last detected movement, following ILP recommendations.

- Low-intensity lighting will be used, with lamps limited to 500 lumens or less. A warm white light source (2700 Kelvin or lower) will be adopted to reduce blue light, which is particularly disruptive to bats.
- Red spectrum lighting will be considered instead of white light, as bats are less sensitive to red wavelengths. This reduces disturbance to bats and invertebrates while maintaining necessary illumination for human use.
- LED luminaires will be installed due to their sharp cut-off, lower intensity, and dimming capabilities. All luminaires will be UV-free, and metal halide or compact fluorescent sources will not be used. LEDs allow for better control of light direction and intensity, further reducing wildlife impacts.
- Directional lighting will ensure all external lighting is angled downwards and fitted with shields or cowls to prevent upward and horizontal light spill.

Significance of residual effects

With mitigation measures in place, there will be no residual effects.

6.3.2 GCN and Reptile PWMS

Potential impacts

Construction phase and reservoir bund removal activities have very low potential to inadvertently harm or kill reptiles and amphibians that may occasionally cross the site in the absence of mitigation.

Mitigation measures

Works will follow this unlicensed Precautionary Working Method Statement (PWMS) to protect GCNs and reptiles from harm.

- An ecologist will attend site to carry out a pre-commencement hand search of the working area, focusing on any piles of materials, bases of vegetation, and areas of potential shelter such as root systems and scrub margins. Before works begin, the ecologist will also deliver a toolbox talk to all contractors on site, outlining how to identify reptiles and GCNs, what to do if any are encountered, and how to follow the PWMS effectively.
- Destructive works and groundworks will avoid the winter hibernation period (November–February inclusive). Groundworks will be short in duration and conducted only during daylight hours.

- Site Notices (Appendix 2) will be displayed on-site in a clearly visible location for contractors to refer to.
- The grassland on-site will be kept short to discourage animals from sheltering within it.
- Roots and dense vegetation will be lifted carefully by hand or with hand tools to avoid harming any concealed animals. Vegetation will be removed gradually and methodically, starting from one end of the habitat and working directionally to allow animals to disperse into surrounding suitable habitat.
- Piles of soil, rubble, pallets, and other materials will be stored on hardstanding where possible. When they require removal or relocation, they will be dismantled carefully by hand.
- Excavations left open overnight will be fully covered or fitted with escape ramps. Ramps should either be soil slopes or a gently sloping roughened timber plank (maximum 45° angle) to enable animals to escape freely overnight.
- Open pipework will be checked for animals before use and sealed overnight.
- Procedure for discovering animals on-site:
 - If a reptile is found during works, all works will pause. The animal will be allowed time to vacate the area safely or it will be moved gently by hand to the northwest boundary of the garden outside the impact zone. It will be carefully placed onto earth or grass, directly beneath a shrub or hedgerow. Provided the law has not been broken i.e. a reptile has not been killed or injured, no further action or licensing is required.
 - If a GCN is found during works, all works will stop. An ecologist will be contacted immediately to advise on next steps to determine the best course of action.
 - If another animal is found on-site that is neither amphibian nor reptile, such as a hedgehog, all works will pause to allow the animal to vacate the works area freely. If it cannot do this due to apparent illness or injury, an ecologist, a vet or a local wildlife hospital will be contacted immediately for advice.
- No vehicles will be parked on grassland overnight.
- No vegetation will be burned on-site.

6.3.3 Nesting Birds

Potential impacts

Birds and their nests, eggs, or dependent young may be harmed, injured, or killed during any vegetation clearance associated with site preparation or construction activities. The mixed scrub on site is particularly suitable for nesting birds, offering dense cover and structural diversity ideal

for species such as blackbird, robin, dunnock, and wren. It is highly likely that active nests will be present in the scrub during the breeding season.

Mitigation measures

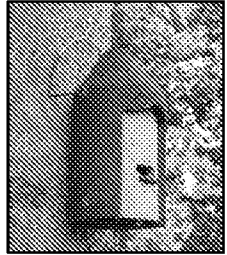
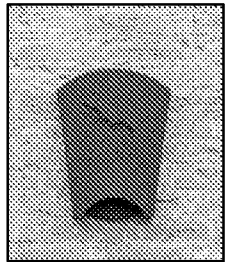
- Due to the high likelihood of birds nesting within the scrub, it is strongly recommended that clearance is timed outside the nesting season (March–August inclusive) to avoid delays to the construction programme.
- If works within the nesting season cannot be avoided, a thorough inspection must be carried out by a suitably qualified ecologist immediately prior to scrub clearance. The ecologist would also remain on-site to supervise the scrub clearance. If an active bird nest is discovered during vegetation clearance, works in that area must pause until the young have fledged. For most common garden and scrub-nesting birds (e.g. blackbird, robin, dunnock), this can result in a delay of approximately 2 to 4 weeks. This period allows time for the eggs to hatch and the chicks to develop enough to leave the nest safely. Larger or later-breeding species may extend this period slightly.

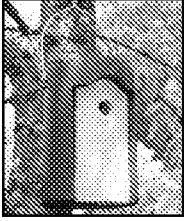
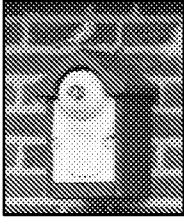
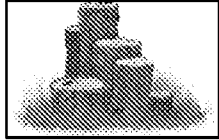
Significance of residual effects

With mitigation measures in place, there will be no residual effects.

7. Enhancements

The proposals at Sefter Farm will adhere to local planning policy, particularly Arun Local Plan Policy ENV DM5, by integrating ecological enhancements into the project's designs. The following recommendations have been made for this project:

Species	On-site Enhancements	Examples
Bats	At least one bat habitat feature will be installed on-site to provide roosting opportunities for bats. This may be a traditional external bat box, such as the Schwegler 2F or Vivara Pro Beaumaris WoodStone®, or a similar equivalent, will be installed on a mature tree. The box will be positioned at a height of 3-5m above ground level, facing between southwest and southeast, in an area free from dense foliage to ensure exposure to sunlight. No artificial lighting will be directed at or near the bat box to avoid disturbance.	Schwegler 2F  Vivara Pro Beaumaris 

Nesting Birds	At least one bird nesting feature will be installed on-site. This may be an external nest box such as those available from Vivara Pro, to support small garden birds like sparrows, robins, and blue tits. Placed 2-4m above ground level, ideally on a mature tree, or on a sheltered wall. The box will face north, away from prevailing winds and direct sunlight. For bird species that prefer covered nesting sites, such as robins and wrens, nest boxes can also be positioned within dense shrubs or climbing vegetation. Placing boxes within hedgerows helps replicate their preferred nesting environment, offering shelter and protection from predators.	<i>Schwegler 1B</i>  <i>Vivara Pro Seville</i>  <i>Schwegler 2H</i> 
Reptiles, GCNs hedgehogs, and invertebrates	One log pile or log pyramid is to be constructed on-site. The bottom layer will be buried to encourage beetles and earthworms and it will be positioned in an undisturbed location, e.g. behind shrubs. Logs may contain drilled holes 5-10mm wide for beetles and solitary bees to nest in.	<i>Log pyramid</i> 

8. Conclusion

The site comprises a mix of intensively managed agricultural land, artificial waterbodies, hardstanding, and buildings, with areas of mixed scrub and modified grassland offering limited ecological value. The packhouse building and surrounding habitats are largely unsuitable for protected species, with only low potential for occasional use by bats, reptiles, amphibians, hedgehogs, and nesting birds.

While no evidence of protected species was recorded during the site assessment, appropriate mitigation measures have been recommended to safeguard any wildlife that may be present, particularly during vegetation clearance and groundworks. A Precautionary Working Method Statement (PWMS) will be implemented to protect reptiles and GCNs, and all works involving scrub clearance will be carefully timed to avoid harm to nesting birds.

No designated sites or priority habitats will be impacted by the proposed works. With the mitigation measures outlined in this report in place, the development is not anticipated to result in any significant residual effects on biodiversity. The project provides opportunities to deliver measurable ecological enhancements in line with the Arun Local Plan, and the proposed development can therefore proceed in accordance with national and local planning policy without adverse ecological impacts.

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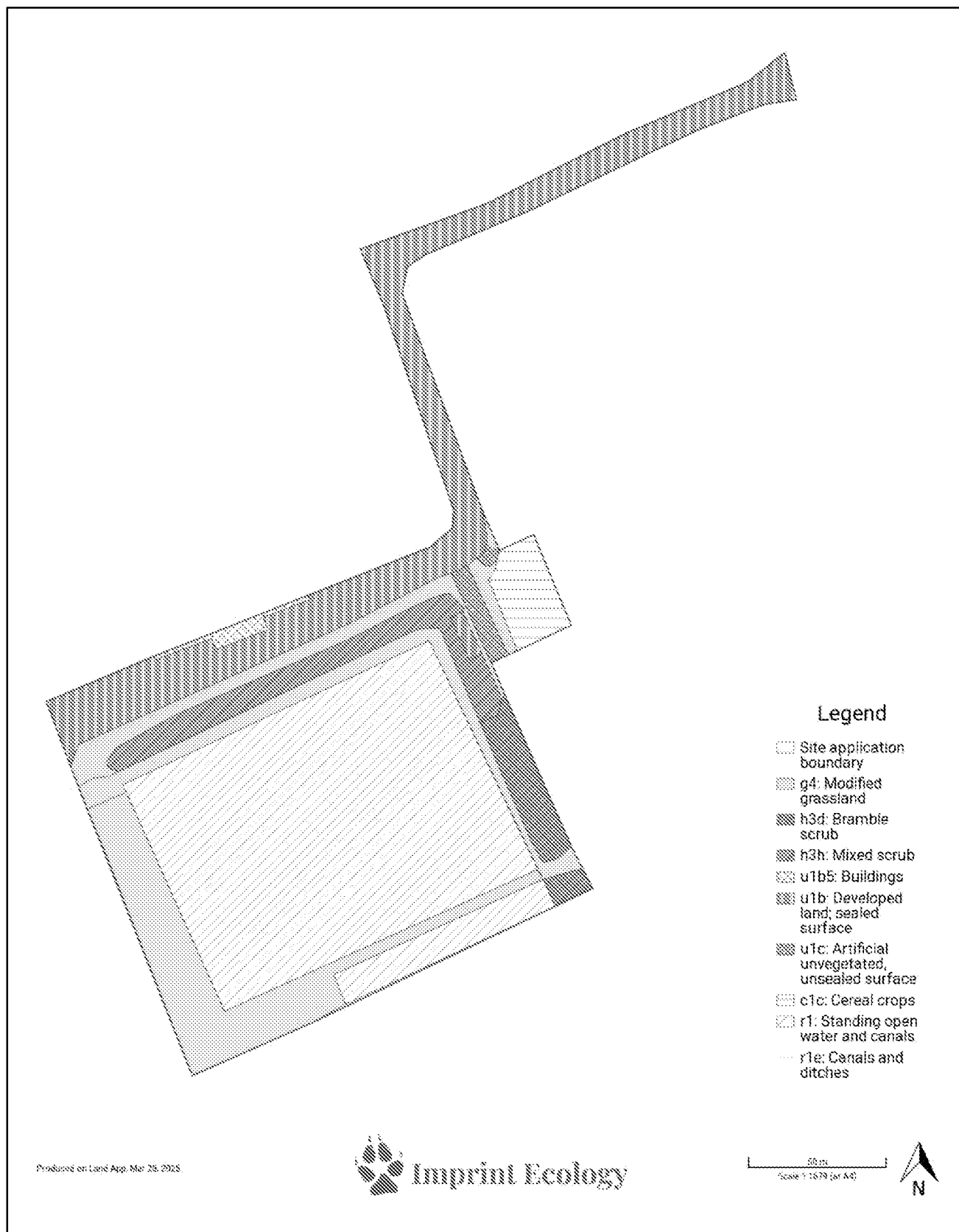
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Appendix 1: UKHab Baseline Habitats Map



Appendix 2: Site Notices

The following two A4-size Site Notices will be printed and displayed in a highly visible location on-site for all contractors to refer to.

Site Notice

Reptiles may be present on-site.

All work will follow the mitigation outlined in the Precautionary Working Method Statement (PWMS).
You must read the PWMS before commencing works.

■ What you need to know:

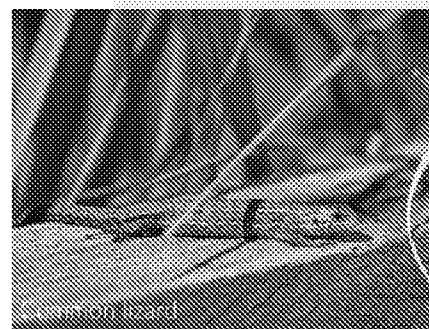
- We have six species of reptile in the UK. You are only likely to find three of our most common species on this site: slow worm, common lizard and grass snake.
- They live in grassland, hedgerows, rubble piles, and under logs or debris. Sometimes, they shelter in cracks in building foundations.
 - Slow worms are legless lizards, growing up to 40 cm long, with smooth, shiny skin in shades of brown, grey, or copper.
 - Common lizards grow to 10-15 cm, with a slender body, brown or greenish markings. They are often seen basking in the sun.
 - Grass snakes may be up to 100cm long, with dark green skin, a yellow collar behind the head, and black markings along the body. They are non-venomous and often found near water.

■ What your legal obligations are:

- Reptiles are legally protected from killing and injuring.
- If a reptile is found you must **STOP WORK** immediately and inform the site manager who will contact an ecologist for advice on how to proceed.

■ General measures to be followed as part of the PWMS:

- Excavations will be covered or fitted with escape ramps, pipework checked and sealed daily, and materials stored on hardstanding.
- Grass will be kept short, and shrubs will be cleared in two stages. No vegetation will be burned on-site.
- Tree stumps, large logs, pallets, etc. will be gently rolled over and removed carefully.



Site Notice

Great Crested Newts (GCN) may be present on-site.

All work will follow the mitigation outlined in the Precautionary Working Method Statement (PWMS). You must read the PWMS before commencing works.

■ What you need to know:

- GCN and their habitats are legally protected.
- They live in ponds and surrounding land, especially damp areas, grassland, hedgerows, and under logs or rubble. Sometimes they live within cracks in building foundations.
- Average length: 11-14cm. Dark, warty skin, with a bright orange underside covered in irregular black spots.
 - Males have a high, jagged crest running along their back and tail during the breeding season, with a silvery-white stripe along the tail.
 - Females lack the crest, but are slightly larger, with an orange stripe along the lower edge of the tail.

■ What your legal obligations are:

- GCN are European Protected Species.
- This means it is illegal to disturb, harm, kill, possess or transport them without a licence.
- If a GCN is found you must **STOP WORK** immediately and inform the site manager who will contact an ecologist for advice on how to proceed.

■ General measures to be followed as part of the PWMS:

- Excavations will be covered or fitted with escape ramps, pipework checked and sealed daily, and materials stored on hardstanding.
- Grass will be kept short, and shrubs will be cleared in two stages. No vegetation will be burned on-site.
- Tree stumps, large logs, pallets, etc. will be gently rolled over and removed carefully.

