



Land off Arundel Road

*Ecology Assessment &
BNG Design Report*

11 MARCH 2026

Commissioned by

Harlequin Developments,
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1. Introduction

1.1. Background

- 1.1.1. Derek Finnie Associates was commissioned by Harlequin Developments to undertake an Ecological Assessment in relation to an area of land referred to as Land off Arundel Road, Fontwell, West Sussex, herein referred to as the 'Site' (Figure 1). Harlequin Developments is submitting a detailed planning application for the erection of 64 residential dwellings with access off Arundel Road, together with associated parking, open space, play space, landscaping, drainage and infrastructure. Therefore, there is a need to understand the ecological value of the Site and determine the presence or otherwise of protected species, as these are a material consideration in planning system.
- 1.1.2. To this end, an Extended Phase 1 Habitat survey of the Site was undertaken in March 2024, with subsequent badger, reptile and bat surveys being conducted throughout the summer of 2024 and a follow up verification survey in February 2026. The following report describes the methodology employed, describes the current ecological conditions within the Site, evaluates the ecological receptors identified and assesses the potential impact of the proposal based on information gathered to date.

2. Legislative Framework

2.1. LEGISLATIVE FRAMEWORK

National policy and Guidance

Legal Framework

2.1.1. The legislative framework applicable to this assessment is summarised below.

International Conventions and Directives

- Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (EC Habitats Directive);
- Council Directive 2009/147/EC on the Conservation of Wild Birds (Birds Directive);
- The Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention) 1979;
- The Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) 1983; and
- Convention on Biological Diversity 1992.

National Legislation

- Environment Act 2021
- The Wildlife and Countryside Act 1981 (WCA);
- The Conservation of Habitats and Species Regulations 2017;
- The Countryside and Rights of Way Act 2000 (CROW);
- Natural Environment and Rural Communities Act 2006 (NERC);
- The Protection of Badgers Act 1992; and
- The Hedgerow Regulations 1997.

Statutorily Protected Sites

2.1.2. Local Nature Reserves (LNRs); National Nature Reserves (NNRs); Sites of Special Scientific Interest (SSSIs); Special Areas of Conservation (SAC); and Special Protection Areas (SPAs) contain examples of some of the most important natural and semi-natural ecosystems in Europe and receive strict protection under United Kingdom (UK) legislation. Although not strictly protected under legislation, Ramsar sites are given the same level of protection through policy.

Non-Statutory Sites

- 2.1.3. Non-statutory sites of county conservation value are designated by Local Planning Authorities (LPAs). Such sites are afforded a measure of protection in local development plans.

Protected Species

- 2.1.4. Under UK legislation, a number of species, including bats *Chiroptera* sp. and great crested newts *Triturus cristatus* are strictly protected from death, injury or harm; whilst places used for their shelter or rest are protected from damage, disturbance and destruction. Certain species such as some reptiles and birds only receive partial protection under UK legislation, e.g. protection from killing / injuring only or protection at certain times of the year only.

Invasive Weeds

- 2.1.5. The WCA 1981 makes it an offence to plant or otherwise cause to grow in the wild numerous species including Japanese knotweed *Fallopia japonica* and giant hogweed *Heracleum mantegazzianum*.

Non-Statutory Policies

- 2.1.6. The UK Biodiversity Action Plan (UK BAP) was established in response to the global Convention on Biological Diversity, 1992. Individual Action Plans define actions and measures to meet the conservation objectives defined in the strategy and specify measurable targets. They determine the broad habitats and species that are of value to the natural environment of the UK and identify actions and projects that could be undertaken to help protect or enhance the national biodiversity.
- 2.1.7. Local Biodiversity Action Plans (LBAPs) are implemented through planning policy, identifying habitats and species in need of conservation action at the local or regional level. BAPs in the UK have no statutory status but provide a framework for implementing conservation requirements.

Planning Policy

National Planning Policy

National Planning Policy Framework 2023

- 2.1.8. The following objectives relating to biodiversity conservation are considered relevant to this assessment. The National Planning Policy Framework (NPPF) seeks to:
- Protect and enhance valued landscapes, geological conservation interests and soils;
 - Recognise the wider benefits of ecosystem services;
 - Minimise impacts on biodiversity and provide net gains in biodiversity, where possible, contribute to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

- Prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;
- Remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate; and
- Prevent the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

Local Planning Policy

- 2.1.9. Consideration was also given to the policies with the adopted Arun Local Plan 2011-2031 (July 2018), specifically:

Policy ENV SP1

Natural Environment

Arun District Council will encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environment through the development process and particularly through policies for the protection of both designated and non-designated sites. Where possible it shall also promote the creation of new areas for habitats and species. In relation to designated sites, development will be permitted where it protects sites listed in Tables 17.1-17.7 that are recognised for the species and habitats contained within them.

Policy ENV DM1

Designated Sites of biodiversity or geological importance

Policy ENV DM3

Biodiversity Opportunity Areas

Development shall:

- a. Retain and sympathetically incorporate locally valued and important habitats, including wildlife corridors and stepping stones*
- b. Be designed in order to minimise disturbance to habitats*

Development proposals that do not reasonably address opportunities for enhancing these through their design, layout and landscaping or access/management shall not be permitted. Where a development scheme would result in a habitat loss, mitigation measures will be proposed as part of the proposed scheme and such measures agreed with the Local Planning Authority prior to the determination of any planning application.

Within Biodiversity Opportunity Areas (BOAs) identified on the Policies Maps or where likely to have an impact on species or habitats within the BOAs, any application for planning permission shall

include a properly conducted survey of the presence of that species and habitat and impact(s) that development may have on the BOA.

Policy ENV DM5

Development and biodiversity

Development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site. They shall also however incorporate elements of biodiversity including green walls, roofs, bat and bird boxes as well as landscape features minimising adverse impacts on existing habitats (whether designated or not). Development schemes shall also be appropriately designed to facilitate the emergence of new habitats through the creation of links between habitat areas and open spaces. Together, these provide a network of green spaces which serve to reconnect isolated sites and facilitate species movement.

Where there is evidence of a protected species on a proposed development site, planning applications shall include a detailed survey of the subject species, with details of measures to be incorporated into the development scheme to avoid loss of the species. This involves consideration of any impacts that will affect the species directly or indirectly, whether within the application site or in an area outside of the site, which may be indirectly affected by the proposals. All surveys shall be carried out at an appropriate time of year and shall be undertaken by a qualified and, where appropriate, suitably licensed person.

All developments shall have regard to Natural England's standing advice for protected species.

- 2.1.10. As the Site is over 11km to Pagham Harbour SPA, it was deemed that Policy ENV DM2 is not applicable in this case.

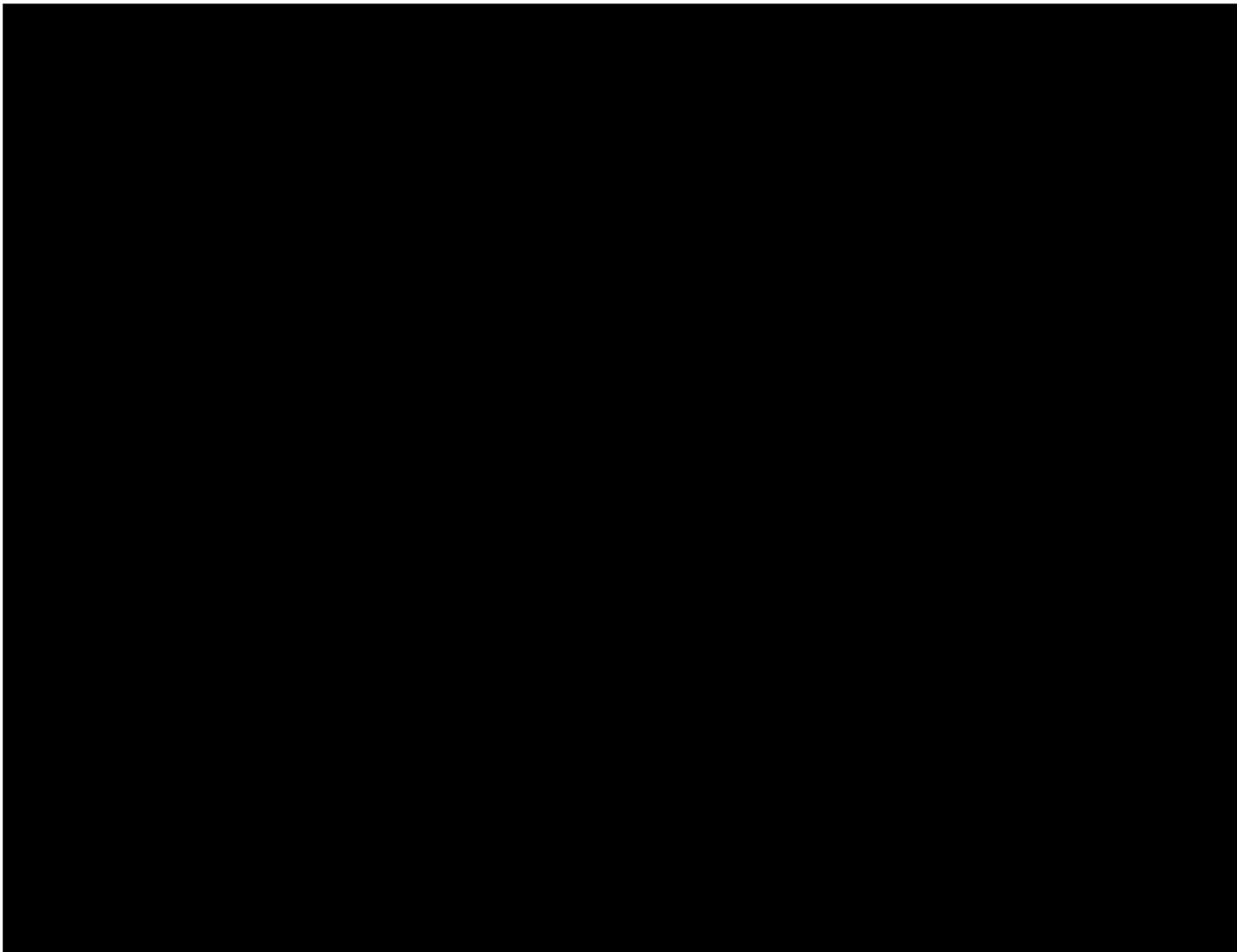
3. Methodology

3.1. Data Search

- 3.1.1. A review of the Government's MAGIC website was undertaken for the location and extent of statutory protected sites within 2km of the Site, extending to 5km in the case of Natura 2000 sites.
- 3.1.2. Sussex Biological Records Centre (SxBRC) was also contacted for information they may hold on non-statutory designated sites as well as species of a raised conservation status.

3.2. Habitat Survey & BNG Baseline

- 3.2.1. An 'extended' Phase 1 Habitat Survey was carried out on the 4th March 2024, with a follow up verification visit made on 25th February 2026. The survey methodology followed that presented by the JNCC (2010). The Phase 1 technique aims to classify each habitat into categories based on the assemblage of plant species present, with the dominant plant species for each habitat being noted. In some cases, sub-divisions or modifications of the standard categories can be made where this is useful in providing further detail.
- 3.2.2. An 'extended' form of the basic methodology was employed to determine whether any notable or protected species of fauna utilise the study area, in particular badgers, bats, amphibians, reptiles and birds. In the absence of direct evidence of these species, an assessment was made on the potential for the site to support such species.
- 3.2.3. Additional data on certain vegetation parameters were also collected during the site survey to allow the Defra Biodiversity Net Gain metric to be completed.
- 3.2.4. The Defra Metric looks at the biodiversity value of a site prior to the proposed development by assigning values to each habitat type, the quality or condition of the habitat and the extent of that habitat. This results in a combined value for the site presented in an arbitrary figure expressed as Biodiversity Units. A similar approach is also taken for linear features within a site, such as hedgerows and rivers, where applicable.
- 3.2.5. A second calculation is then undertaken for the post development scenario based on the proposed scheme layout in the absence of detailed landscape planting plans. The difference in units pre and post development is then expressed as a percentage for habitats, hedgerows and rivers (where applicable).
- 3.2.6. If a significant increase in BNG value cannot be achieved within the Site, there is the potential to provide off site enhancements to complement on-site works. Alternatively, it possible to 'purchase' biodiversity units from a third party.



3.4. Reptile survey

- 3.4.1. During the Phase 1 Habitat survey, potentially suitable reptile habitat was identified, hence it was deemed appropriate to undertake a species-specific survey of this taxon.
- 3.4.2. A total of 35 refugia, consisting of heavy-duty roofing felt approximately 0.5m², were placed across the Site in line with best practice survey guidance. To maximise the efficiency of the survey the refugia were concentrated in areas which appeared to be more likely to support reptiles (Figure 2). The refugia were placed across the 2.7ha site at the density slightly above that recommended by Froglife (1999) of 10ha⁻¹; this allows for some loss or damage to the refugia during the course of the survey with affecting the results significantly.
- 3.4.3. The refugia generally heat up quicker than the surrounding environment, which makes them attractive to reptiles which need to attain a certain body temperature to hunt effectively. Thus,

careful inspection of the refugia results in a more effective way to locate these often-elusive animals.

- 3.4.4. The refugia were placed on Site on the 19th May 2024 and allowed to 'bed in' for at 10 days before the survey proper began. The refugia will be checked on seven occasions throughout the survey period, on suitable days, which are classified as sunny, or partially sunny days, with little or no wind and an air temperature between 8°C and 19°C. To date, the refugia have been inspected on four occasions as summarised in Table 1.

Table 1. Reptile Survey Dates

Visit No.	Date	Weather
1	29/05/24	13°C, sunny, no cloud
2	08/06/24	15°C, 2/8 cloud
3	16/06/24	14°C, 1/8 cloud, light wind
4	12/07/24	16°C, sunny, 4/8 cloud
5	25/07/24	13°C, hazy sun, 2/8 cloud
6	16/08/24	12°C, clear, 1/8 cloud
7	03/09/24	10°C, sunny, no cloud

- 3.4.5. In addition to checking the artificial refugia, other suitable natural basking areas around the Site were carefully inspected from a short distance using Leica 10x32 BGA binoculars, expanding the search area to cover parts of the Site where refugia could not be placed.

3.5. Bat Survey

Night Time Walkover Surveys (NTWS)

- 3.5.1. The methodology for the activity surveys was based on that outlined within the Bat Conservation Trust guidelines (BCT 2023), modified to meet the specific site requirements. The aim of the survey was to provide an indication of the level of bat activity within the study area, the species present and their distribution.
- 3.5.2. To date, two NTWS have been undertaken across the Site; a further two are planned. The surveys were conducted on the dates shown in Table 2. The surveys commenced approximately 15 minutes prior to sunset and concluded one and half hours after sunset. On each survey event, the surveyor was positioned in the south west corner of the Site, where bat activity was likely to be greatest. Forty five minutes after sunset, when commuting appeared to have ceased, the surveyor walked a continuous transect along a predetermined route (Figure 2), noting bat activity enroute. The surveyor was equipped with an Echo Meter Touch Pro 2 bat detector and a pair of 'Hikmicro Habrok 4K HE25L' infra-red and thermal imaging binoculars. The Echo Meter Touch Pro 2 allows bat calls to be recorded in both full spectrum and heterodyne; any bat calls can then be analysed using specific software where necessary.

Table 2. Bat Activity Survey Dates

Date	Sunset	Start time	Temperature	Weather
29/05/24	20:30	20:15	13°C	Dry, light breeze
16/06/24	21:20	21:00	12°C	Clear, moderate breeze

Static Surveys

- 3.5.3. In addition to the activity surveys, two Anabat Swift static detectors were placed within the branches of suitable tree on three occasions to date (See Figure 2). The static detectors were in place between 1st - 5th May 3rd – 8th June and, 12th – 17th July 2024. A 2m microphone extension lead was used to ensure the microphone was located within the optimum presumed flight path of any foraging bats. A further two deployments are planned, in August and September.
- 3.5.4. The data from the detectors were analysed using Anabat Insight with BatClassify UK AutoID, with the ID Tag Certainty Threshold set at 80%. For the commoner species (common pipistrelle and soprano pipistrelle) one in every ten recordings was checked manually, with recordings being compared to those presented by Russ (2012); for the more uncommon species, every recording was checked manually.
- 3.5.5. Given the size of the Site and the habitats present, the level of bat survey was deemed sufficient.

3.6. Survey Constraints

- 3.6.1. Phase 1 can be undertaken at any time of the year, with March being considered to be one of the more favourable months, although species that may flower later in the year could be under record or missed. However, given the habitats within the Site, and the subsequent visits made during the species -specific surveys, the confidence in the results is high.
- 3.6.2. The survey was undertaken in line with the latest sectoral guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM) and BS 42020: 2013 *Biodiversity – Code of Practice for Planning and Development*.
- 3.6.3. All surveys were undertaken by Derek Finnie MSc DipCons CEnv MEnvSc MCIEEM, Director of Derek Finnie Associates and a practicing ecologist with over 30 years' experience.

4. Site Description

4.1. Desk Study

Statutory Sites

- 4.1.1. Pagham Harbour, which holds the multiple designations of SPA and SSSI lies approximately 11km to the south west.
- 4.1.2. There are no other statutory designated sites within 2km of the application site.

Non-Statutory Sites

- 4.1.3. SxBRC provided information on four Local Wildlife Sites within 2km of the Site, as summarised in Table 3.

Table 3. Local Wildlife Sites

Site Name	Distance from Application Site	Comment
Fontwell Park Racecourse	1km to the west	Parts of the grassland around the sides and inside the racetrack of Fontwell Park are managed as hay meadow and have very species-rich swards. The flora includes some notable species, such as Adder's-tongue <i>Ophioglossum vulgatum</i> and a large population of Green-winged Orchid <i>Orchis morio</i> .
Binstead Wood Complex	1.8km to the east	Binsted Wood is a complex of woodland sites which includes Hundredhouse Copse in the west and Stewards Copse to the east. There is a mixture of ancient woodland, recent woodland, conifer plantation, species rich pasture and old tracks and shaws.
Rewell Wood Complex	1.7km to the east	Rewell Wood is a large ancient woodland complex. It has a diversity of habitats including ancient semi-natural woodland, worked Sweet Chestnut coppice, conifer plantation, Beech plantation and species-rich chalk grassland.
Slindon Bottom	0.6km to the west	This ancient woodland lies at the junction of two geological types, namely Valley Gravel and Upper Chalk. It consequently has a varied flora. Most of it is semi-natural, though some areas have been replanted with conifers.

- 4.1.4. There are several blocks of ancient woodland, with the nearest, Slindon Wood, being some 240m to the north on the far side of the A27.

Species of a Raised Conservation Status

- 4.1.5. SxBRC do not hold any records of specially protected species or species of a raised conservation status for the site itself.
- 4.1.6. A record exists of a single slow worm some 200m to the south of the Site, but this is from 1989 so is likely to be of little relevance.
- 4.1.7. Several hazel dormouse have been recorded to the south of the Site, with the closest being some 500m away. However, there is no direct habitat connectivity to the Site itself.

4.2. Extended Phase 1 Survey

- 4.2.1. The Site, which covers approximately 2.7ha, comprises a semi-improved grass field, which appears to have been sub-divided into several horse grazing paddocks in the past. Outgrown hedgerows are present along the east and southern boundaries, whilst a linear belt of broad-leaved plantation woodland is present along the northeast boundary.
- 4.2.2. The A27 Arundel Road runs contiguous with the Site's northeast boundary, whilst existing residential dwellings lies to the west and, to a lesser extent, to the south,
- 4.2.3. The following Phase 1 habitats were encountered within, and adjacent to, the Site:
- Broad-leaved plantation;
 - Scattered trees;
 - Hedgerows;
 - Tall ruderal;
 - Semi-improved grassland; and
 - Hardstanding
- 4.2.4. Each habitat is described in turn below and depicted on Figure 1.

Broad-leaved plantation

- 4.2.5. Along the northeast boundary of the Site is a linear belt of broad-leaved plantation woodland, separating the Site from the adjoining A27 trunk road. The woodland comprises a mixture of oak *Quercus* sp., field maple *Acer campestre*, holly *Ilex aquilinum*, poplar *Populus* spp. as well as hawthorn *Crataegus monogyna* and blackthorn *Prunus spinosa*. As is typical of this type of plantation, the canopy is extremely dense leading to a highly impoverished field and ground layer.

Scattered trees

- 4.2.6. There are several individual trees within the hedgerow around the periphery of the Site, and along the southern boundary where they form more or less a continuous belt of trees. Here, ash *Fraxinus excelsior*, oak and sycamore *Acer pseudoplatanus* were noted.

Hedgerows

- 4.2.7. Hedgerows form the boundary to the south and west of the Site. They are generally outgrown, displaying limited management. Woody species within the hedgerows comprise, hawthorn, blackthorn, elder *Sambucus nigra*, hazel *Corylus avellana* and bramble *Rubus fruticosus* agg.
- 4.2.8. The ground flora associated with the hedgerow is relatively impoverished, comprising cow parsley *Anthriscus sylvestris*, cock's-foot *Dactylis glomerata*, perennial rye grass *Lolium perenne*, tall oat grass *Arrhenatherum elatius* and bracken *Pteridium aquilinum*.

Tall ruderal

- 4.2.9. A small area of tall ruderal, comprising mainly common nettle *Urtica dioica*, rosebay willowherb *Chamerion angustifolium* and creeping thistle *Cirsium arvensis*, is present in the south east corner of the Site.

Semi-improved grassland

- 4.2.10. Semi-improved grassland is the most abundant habitat type within the Site. It is evident from conditions on Site as well as reviewing historic aerial photos that the sward has been subject to horse grazing in numerous separate paddocks for many years; this appears to have ceased early in 2024.
- 4.2.11. The grazing regime has resulted in a slightly different sward in the north and north east of the Site (Figure 1). Whilst the species throughout are more or less the same, the diversity in this north and northeastern section is greater; the diversity appeared to have dropped slightly by February 2026.
- 4.2.12. The sward throughout is typified by common, widespread graminoid species such as perennial rye grass, cock's-foot, tall oat grass Yorkshire fog *Holcus lanatus*, soft brome *Bromus hordeaceus*, creeping bent *Agrostis capillaris* and crested dog's tail *Cynosurus cristatus*. Forbs are relatively frequent within the sward, and include dandelion *Taraxacum officinale* agg., black knapweed *Centaurea nigra*, lesser stitchwort *Stellaria media* cat's, yarrow *Achillea millefolium* tufted vetch *Vicia cracca*, grass vetchling *Lathyrus nissolia*, ribwort plantain *Plantago lanceolata*, broad-leaved dock *Rumex obtusifolius* and ragwort *Senecio jacobaeae*. A single example of green winged orchid *Anacamptis morio* was also noted towards the north of the Site.

Hardstanding

- 4.2.13. A small area of hardstanding is present towards the south east of the Site close to the existing access.

BNG Baseline

- 4.2.14. In terms of the BNG Metric, a summary of the habitats is present in Table 4.

Table 4. BNG Baseline Habitats

Habitat	Condition	Area/length
Other woodland: mixed	Poor	0.68
Modified grassland	Moderate	0.54
Modified grassland	Poor	1.1
Bramble scrub	N/A	0.35
Ruderal	Poor	0.1

- 4.2.15. There are no irreplaceable habitats as defined by the Biodiversity Gain Requirements (Irreplaceable Habitats) Regulation 2024 on site. And there is no evidence that any form of adverse, or destructive, management has taken within the Site which would affect the condition of the habitats present.
- 4.2.16. It should be noted, however, that during the February 2026 survey, the condition of the grasslands had deteriorated slightly due to the cessation of grazing. For the purposes of the BNG assessment, the higher, March 2024, values has been used as a precaution.

4.3. Fauna

Badgers

- 4.3.1. No evidence of badger activity was encountered within the Site, although the Site was assessed as having limited potential to support such species, with the grassland providing sub-optimal foraging habitat for any clan in the wider area.

Bats

- 4.3.2. Several of the semi-mature trees within the hedgerows do offer some potential roost features, although no evidence of roost has been noted.
- 4.3.3. The NTWS realised a rather impoverished bat assemblage. Up to four common pipistrelle were noted foraging up and down the southern and western hedgerows from 20 minutes after sunset, suggesting the roost is in the wider area and not on Site. Two soprano pipistrelles were all noted in this area on the 29th May, although only a single individual was encountered on 16th June.

- 4.3.4. Up to two individual noctules were also seen foraging widely over the Site on both occasions.
- 4.3.5. The result of the static surveys mirror those of the NTWS, as the summary results in Table 4 show.

Table 5. Summary of Bat Registrations per Night

Species	1st - 5th May		3rd - 8th June		12th - 17th July	
	Det. 1	Det. 2	Det. 1	Det. 2	Det. 1	Det. 2
Common pipistrelle	32	21	65	32	42	27
Soprano pipistrelle	8	11	12	13	21	12
Noctule	4	6	1	2	2	6

Dormouse

- 4.3.6. Whilst the hedgerows are relatively diverse, there is no direct connectivity to woodland blocks that have previously been shown to support this species, hence the potential for dormouse to be present is negligible.

Reptiles

- 4.3.7. No reptiles have been encountered during the survey, and hence they are assumed to be absent from the Site.

Amphibians

- 4.3.8. There are no waterbodies within the Site or in the immediate vicinity and the Site is isolated on all sides by existing barriers such as road and existing residential developments, hence the potential for terrestrial phase amphibians to be present is negligible.

Birds

- 4.3.9. The Site is likely to support common, widespread bird species associated with the agricultural environment. But given the limited extent of the habitats present, it is unlikely that any uncommon species are present.
- 4.3.10. No other uncommon species, or species of a raised conservation concern were noted within the Site and the Site was assessed as having negligible potential to support such species.

5. Evaluation

5.1. Definition of ecological value

- 5.1.1. A geographical scale of reference is used when evaluating ecological receptors within a Site, in line with the latest sectoral guidance presented by CIEEM (2018), as summarised in Table 5. The evaluation categories for each receptor have generally been reached by applying accepted criteria, such as naturalness, rarity, fragility and diversity, first proposed by Ratcliffe (1977) and commonly used in the assessment of both statutory and non-statutory sites.
- 5.1.2. Where sites have already been designated on ecological grounds, the assessment reflects the geographical context of the designations. For example, sites designated under international legislation or treaties are assessed to be of International value, whilst sites designated under UK legislation are of National value.
- 5.1.3. Consideration is also given to legal protection afforded to any ecological receptor within the Site, as are species or habitats identified as 'priorities' for biodiversity conservation in the UK. Local Planning Authorities will often have a duty to consider such species or habitats throughout the planning process, hence their presence within a site is a material consideration.
- 5.1.4. Further frames of reference for individual species are provided by the Red Data Book system, such as the Vascular Plant Red Data List for Great Britain (Cheffings and Farrell 2006) or for birds by reference to the Birds of Conservation Concern (Stanbury *et al.* 2021).

Table 6. Ecological Evaluation Criteria

Value/Importance	Criteria
International (European)	<p>Habitats</p> <p>An internationally designated Site or candidate Site (Special Protection Area [SPA]), provisional SPA, Special Areas of Conservation (SAC), candidate SAC, Ramsar Site, Biogenetic / Biosphere Reserve, World Heritage Site or an area that would meet the published selection criteria for designation. A viable area of a habitat type listed in Annex I of the Habitats Directive, or smaller areas of such habitat, which are essential to maintain the viability of a larger whole.</p> <p>Species</p> <p>Any regularly occurring population of internationally important species, threatened or rare in the UK (i.e. a UK Red Data Book species) or, of uncertain conservation status or, of global conservation concern. A regularly occurring, nationally significant population/number of an internationally important species.</p>
National (English)	<p>Habitats</p> <p>A nationally designated Site (Site of Special Scientific Interest [SSSI], National Nature Reserve [NNR], Marine Nature Reserve [MNR] or a discrete area), which would meet the published selection criteria for national designation (e.g. SSSI selection guidelines).</p> <p>Species</p> <p>A regularly occurring, regionally or county significant population/number of an internationally/nationally important species. Any regularly occurring population of a nationally important species, threatened or rare in the region or county.</p>

Value/Importance	Criteria
Regional (South east)	<p>Habitats</p> <p>Sites that exceed County-level designations, but fall short of SSSI selection criteria.</p> <p>Species</p> <p>Any regularly occurring, locally significant population of a species listed as being nationally scarce, which occurs in 16 of 100 10km² squares in the UK. A regularly occurring, locally significant population / number of a regionally important species. Sites maintaining populations of internationally/nationally important species that are not threatened or rare in the region or county.</p>
Authority Area (e.g. County or District) (Berks)	<p>Habitats</p> <p>Sites recognised by local authorities, e.g. Local Wildlife Sites (LWS). County/District Sites that the designating authority has determined meet the published ecological selection criteria for designation, including Local Nature Reserves (LNR). A diverse and/or ecologically valuable hedgerow network. Semi-natural ancient woodland greater than 0.25ha.</p> <p>Species</p> <p>Any regularly occurring, locally significant population of a considered regional rarity or localisation. Sites supporting populations of internationally/nationally/regionally important species that are not threatened or rare in the region or county, and not integral to maintaining those populations. Sites/features scarce in the County / District or that appreciably enrich the County/District habitat resource.</p>
Local (immediate local area or village importance)	<p>Habitats</p> <p>Areas of habitat that appreciably enrich the local habitat resource (e.g. species-rich hedgerows, ponds etc). Sites that retain other elements of semi-natural vegetation that due to their size, quality or the wide distribution within the local area are not considered for the above classifications. Semi-natural ancient woodland smaller than 0.25 ha.</p> <p>Species</p> <p>Populations/assemblages of species that appreciable enrich the biodiversity resource within the local context. Sites supporting populations of county/district important species that are not threatened or rare in the region or county, and are not integral to maintaining those populations.</p>
Site level (Limited ecological importance)	<p>Sites that retain habitats and/or species of limited ecological importance due to their size, species composition or other factors.</p>

5.2. Site Evaluation

- 5.2.1. No part of the Site or the immediate surrounding area is covered by any form of designation on ecological grounds. At 11km from the Site, Pagham Harbour SPA is outside the Ecological Zone of Influence, deemed to be 6km for residential developments, hence is not considered further in this assessment.
- 5.2.2. The semi-improved grassland within the Site is deemed to be of low to moderate ecological value due to the species assessment. It would be assessed as being of **Site** value at best, with the sward in the north of the Site being of a slightly elevated value. The mature hedgerow and linear belts of trees around the periphery of the Site offer some biodiversity value and contribute to the overall ecological permeability of the Site, as such they have been assessed as being of **Local** value.

- 5.2.3. The hedgerow does not appear to meet the criteria to be classified as 'Important' under the Hedgerow Regulations 2017 but would be classified as a Habitats of Principle Importance (HPI) under Section 41 of the NERC Act 2006; Maddock (2008) estimated 84% of countryside hedgerows would be classified as HPis.
- 5.2.4. The bat population would be assessed as being of **Local** value only.

6. Predicted Impacts, Mitigation and Enhancements

7.1. Predicted Impacts

- 7.1.1. The creation of the new access into the Site will require the loss of two small groups of blackthorn, which in themselves have limited ecological value. Their removal will, however, create a new gap in the line of mature trees along the southern boundary of the Site. The existing entrance to the Site will be infilled with native planting, with additional enforcement planting for the remainder of the southern treeline. Hence, overall there is likely to be a slight betterment resulting in a permanent, positive impact at a **Site** scale of magnitude.
- 7.1.2. The construction of the main development would lead to the loss of the majority of the semi-improved grassland within the Site, which has been assessed to be of Site value. Hence, its loss, in the absence of mitigation, would result in a permanent, long term adverse impact at a **Site** scale of magnitude.
- 7.1.3. The small areas of tall ruderal and hardstanding would also be lost, but as these have been assessed as being of Negligible ecological value, there would be negligible impact.

7.2. Mitigation and Enhancements

- 7.2.1. Habitat creation and ecological enhancements have been considered from the onset, with the landscape design being development with input from the ecology team from the start. Features of ecological value, such as the southern and northeastern tree line will be retained and enhanced throughout. Additional habitat of high ecological value that will be created through the landscape design include:
- Over 3900m² of wildflower meadow;
 - 1,500m² of species rich flowering lawn;
 - 150 new native trees;
 - Almost 0.1ha of new scrub;
 - Over 396m of new, species rich, native hedgerows
 - 59m of green walls.
- 7.2.2. The mitigation and enhancements are predicted to more than offset the potential impacts of the scheme with the residual impacts likely to be positive at as Site scale. This is re-enforced by the results of the Defra Biodiversity Net Gain metric which realised a 28.16% increase the biodiversity value of habitats and 169% in relation to hedgerows within the site post

development, as summarised in Table 6 (the BNG Metric has been submitted as a separate spreadsheet).

Table 7. BNG Headline Results

FINAL RESULTS		
Total net unit change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	2.42
	<i>Hedgerow units</i>	2.92
	<i>Watercourse units</i>	0.00
Total net % change <small>(Including all on-site & off-site habitat retention, creation & enhancement)</small>	<i>Habitat units</i>	28.16%
	<i>Hedgerow units</i>	169.07%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	Yes ✓	

- 7.2.3. An Ecology Management and Monitoring Plan will be devised for the Site to ensure that the maximum ecological benefits are realised on a long term, sustainable manner and that the predicted increase in the BNG of the site is delivered.

7. References

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- Ratcliffe. D.R. 1977 A Nature Conservation Review (Volumes 1 & 2). Cambridge University Press.
- Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. 2021. The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds 114: 723-747



Legend

-  Broad-leaved tree
-  Broad-leaved plantation
-  Hedgerow
-  Tall ruderal
-  Grassland (moderate diversity)
-  Grassland (low diversity)
-  Hardstanding

Drawing Number:

Figure 1

Title:

Habitat Map

Date:

March 2026

Project:

Land at Arundel Road

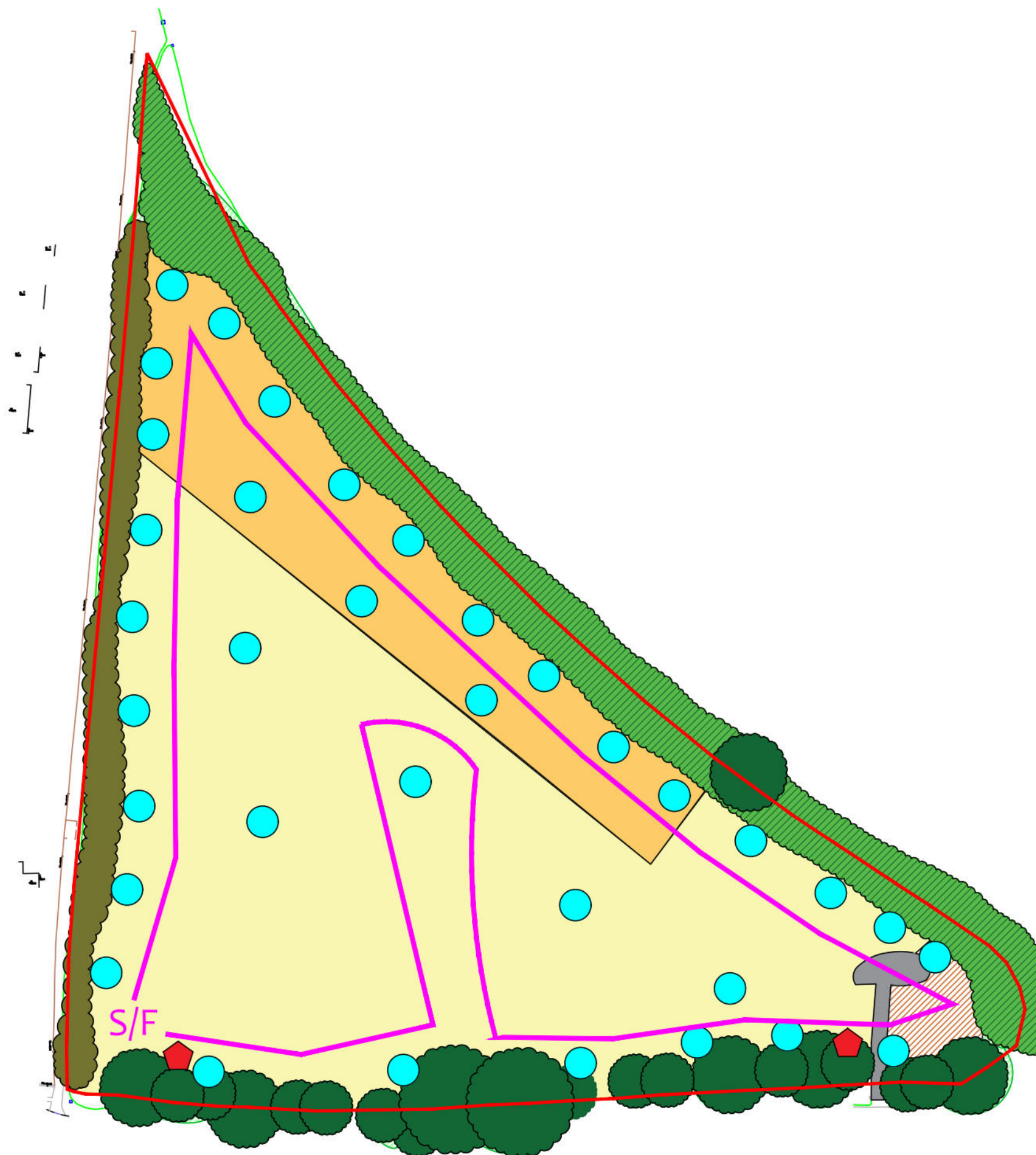
Client:

Harlequin Developments

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- Legend
- Reptile refugia
 - Static bat detector
 - Bat transect route

Drawing Number:	Figure 2
Title:	Survey Locations
Date:	March 2026
Project:	Land at Arundel Road
Client:	Harlequin Developments
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Appendix 1.

BNG Condition Sheets

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)			
UK Habitat Classification (UKHab) Habitat Type			
Grassland - Modified grassland			
On-site or off-site, site name and location	Arundel Road	Survey date and Surveyor name	March 2024, Derek Finnie
Limitations (if applicable)		Survey reference (if relating to a wider survey)	Northern part of site
Grid reference		Habitat parcel reference	
Habitat Description			
Semi-imprvred grassland			
ukhab – UK Habitat Classification			
Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	<p>There are 6-8 vascular plant species per m² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition.</p> <p>Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.</p>	Yes	Sward doinated by very few graminoid species, with some forbes being locally abundantonly.
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	No	Sward previousluy horse grazed by now left unmanaged - sward approximately 200mm throughout.
C	<p>Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present).</p> <p>Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.</p>	yes	No significant scrub noted within thr grassalnd itself
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	No	Previous poaching by horses, bare grond by machinery/stable and eroded footpaha round periphery.
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens) ² .	Yes	
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Yes	Bracken absent
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA ⁴).	Yes	
Essential criterion achieved (Yes or No)			No
Number of criteria passed			Five
Condition Assessment Result (out of 7 criteria)	Condition Assessment Score	Score Achieved x/√	
Passes 6 or 7 criteria including passing essential criterion A	Good (3)		

Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)	x	
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)		
Suggested enhancement interventions to improve condition score			
Footnotes			
<p>Footnote 1 – Creeping thistle <i>Cirsium arvense</i> , spear thistle <i>Cirsium vulgare</i> , curled dock <i>Rumex crispus</i> , broad-leaved dock <i>Rumex obtusifolius</i> , common nettle <i>Urtica dioica</i> , creeping buttercup <i>Ranunculus repens</i> , greater plantain <i>Plantago major</i> , white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i> .</p> <p>Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.</p> <p>Footnote 3 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.</p> <p>Footnote 4 – Wildlife and Countryside Act 1981 (as amended).</p>			

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)			
UK Habitat Classification (UKHab) Habitat Type			
Grassland - Modified grassland			
On-site or off-site, site name and location	Arundel Road	Survey date and Surveyor name	March 2024, Derek Finnie
Limitations (if applicable)		Survey reference (if relating to a wider survey)	Southern part of site
Grid reference		Habitat parcel reference	
Habitat Description			
Semi-imprved grassland			
ukhab – UK Habitat Classification			
Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	<p>There are 6-8 vascular plant species per m² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition.</p> <p>Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.</p>	No	Sward doinated by very ferw graminoid species, with some forbes being locally occasinl only.
B	<p>Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.</p>	No	Sward previousluy horse grazed by now left unmanaged - sward approximately 200mm throughout.
C	<p>Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present).</p> <p>Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.</p>	yes	No significant scrub noted within thr grassalnd itself
D	<p>Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.</p>	No	Previous poaching by horses, bare grond by machinery/stable and eroded footpaha round periphery.
E	<p>Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens)².</p>	Yes	
F	<p>Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.</p>	Yes	Bracken absent
G	<p>There is an absence of invasive non-native plant species³ (as listed on Schedule 9 of WCA⁴).</p>	Yes	
Essential criterion achieved (Yes or No)			No
Number of criteria passed			Four
Condition Assessment Result (out of 7 criteria)	Condition Assessment Score	Score Achieved x/√	
Passes 6 or 7 criteria including passing essential criterion A	Good (3)		

Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)		
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)	x	
Suggested enhancement interventions to improve condition score			
Footnotes			
<p>Footnote 1 – Creeping thistle <i>Cirsium arvense</i> , spear thistle <i>Cirsium vulgare</i> , curled dock <i>Rumex crispus</i> , broad-leaved dock <i>Rumex obtusifolius</i> , common nettle <i>Urtica dioica</i> , creeping buttercup <i>Ranunculus repens</i> , greater plantain <i>Plantago major</i> , white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i> .</p> <p>Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.</p> <p>Footnote 3 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.</p> <p>Footnote 4 – Wildlife and Countryside Act 1981 (as amended).</p>			

Condition Sheet: URBAN Habitat Type			
Habitat Types			
Sparsely vegetated land - Ruderal/Ephemeral Sparsely vegetated land - Tall forbs Urban - Allotments Urban - Biodiverse green roof Urban - Bioswale Urban - Cemeteries and churchyards Urban - Facade-bound green wall Urban - Ground based green wall Urban - Intensive green roof Urban - Open mosaic habitats on previously developed land Urban - Rain garden Urban - Sustainable drainage system (SuDS) Urban - Vacant or derelict land Urban - Bare ground			
Habitat Description			
Ruderal and tall herbs in varying abundacne around periphery of site.			
See the Statutory Biodiversity Metric User Guide for green roofs and UK Habitat Classification (UKHab) for other habitats:			UKHab – UK Habitat Classification
On-site or off-site, site name and location	Arundel Road	Survey date and Surveyor name	March 2024, Derek Finnie
Limitations (if applicable)		Survey reference (if relating to a wider survey)	
Grid reference		Habitat parcel reference	
Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
Core Criteria - must be assessed for all urban habitat types :			
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	No	Limited varaiton in floral composition, comprinsing competitive species
B	The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	No	Limited varaiton in floral composition, comprinsing competitive species
C	Invasive non-native plant species (listed on Schedule 9 of WCA ¹) and others which are to the detriment of native wildlife (using professional judgement) ² cover less than 5% of the total vegetated area ³ . Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	Yes	
Additional Criterion - must be assessed for Open mosaic habitat on previously developed land only:			
D	The parcel shows spatial variation and forms a mosaic of bare substrate PLUS: - At least four early successional communities (a) to (i); Communities: (a) annuals; (b) mosses/liverworts; (c) lichens; (d) ruderals; (e) inundation species; (f) open grassland; (g) flower-rich grassland; (h) heathland, (i) pools.		
Additional Criteria - must be assessed for Bioswale and SuDS habitat types only:			
E1	Plant species are mostly native. If non-native species are present, they should not be detrimental to the habitat or native wildlife ⁴ .		
E2	The vegetation is comprised of plant species suited to wetland or riparian situations.		
Additional Criterion - must be assessed for Intensive green roofs only:			

F	The roof has a minimum of 50% native and non-native wildflowers. 70% of the roof area is soil and vegetation (including water features).		
Additional Criterion - must be assessed for Biodiverse green roofs only:			
G	The roof has a varied depth of 80 – 150 mm; at least 50% is at 150 mm and is planted and seeded with wildflowers and sedums or is pre-prepared with sedums and wildflowers. Note – to achieve Good condition some additional habitat, such as sand piles, stones, logs etc. are present.		
Essential criteria relevant for habitat type achieved (Yes or No)			No
Number of criteria passed			Two
Condition Assessment Result		Condition Assessment Score	Score Achieved ×/√
Results for habitats requiring assessment of 3 core criteria only (all listed urban habitats except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs):			
<ul style="list-style-type: none"> • Passes all 3 core criteria; AND <ul style="list-style-type: none"> • Meets the requirements for Good condition within criterion C. 		Good (3)	
<ul style="list-style-type: none"> • Passes 2 of 3 core criteria; OR <ul style="list-style-type: none"> • Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C. 		Moderate (2)	Two
<ul style="list-style-type: none"> • Passes 0 or 1 of 3 core criteria. 		Poor (1)	
Results for Green roofs and Open mosaic habitat on previously developed land (requiring assessment of 4 criteria only - core criteria plus additional criterion specified for habitat type):			
<ul style="list-style-type: none"> • Passes all 3 core criteria; AND <ul style="list-style-type: none"> • Meets the requirements for Good condition within criterion C; AND <ul style="list-style-type: none"> • Passes additional criterion relevant to specific habitat type (D, F or G). 		Good (3)	
<ul style="list-style-type: none"> • Passes 2 or 3 of 4 criteria; OR <ul style="list-style-type: none"> • Passes 4 of 4 criteria but does not meet the requirements for Good condition within criterion C. 		Moderate (2)	
<ul style="list-style-type: none"> • Passes 0 or 1 of 4 criteria. 		Poor (1)	
Results for Bioswale or SuDS (requiring assessment of 5 criteria - core criteria plus additional criteria specified for habitat type):			
<ul style="list-style-type: none"> • Passes all 3 core criteria; AND <ul style="list-style-type: none"> • Meets the requirements for Good condition within criterion C; AND <ul style="list-style-type: none"> • Passes all additional criteria relevant to specific habitat type (Group E) 		Good (3)	
<ul style="list-style-type: none"> • Passes 3 or 4 of 5 criteria; OR <ul style="list-style-type: none"> • Passes 5 of 5 criteria but does not meet the requirements for Good condition within criterion C. 		Moderate (2)	
<ul style="list-style-type: none"> • Passes 2 or fewer of 5 criteria. 		Poor (1)	
Suggested enhancement interventions to improve condition score			
Footnotes			

Condition Sheet: WOODLAND Habitat Type						
UK Habitat Classification (UKHab) Habitat Types						
Woodland and forest - Lowland beech and yew woodland Woodland and forest - Lowland mixed deciduous woodland Woodland and forest - Native pine woodlands Woodland and forest - Other coniferous woodland Woodland and forest - Other Scot's pine woodland Woodland and forest - Other woodland; broadleaved Woodland and forest - Other woodland; mixed Woodland and forest - Upland birchwoods Woodland and forest - Upland mixed ashwoods Woodland and forest - Upland oakwood Woodland and forest - Wet woodland						
Habitat Description						
<div>ukhab – UK Habitat Classification</div> <div>This condition sheet is based on the England Woodland Biodiversity Group (EWBG) Woodland Condition Survey Method, available here: Woodland Wildlife Toolkit (sylva.org.uk)</div> <div>IMPORTANT: This biodiversity metric woodland condition assessment must be used to assess woodland being input into the biodiversity metric. The outputs of this condition assessment are not equivalent to, nor are they comparable with the scores from the EWBG condition assessment, because the EWBG assessment has been adapted for the biodiversity metric, including the removal of EWBG Indicator 7 (Proportion of favourable land cover around woodland) and Indicator 14 (Size of woodland), and minor changes to other indicators.</div>						
On-site or off-site, site name and location	Arundel Road	Survey date and Surveyor name	March 2024, Derek Finnie			
Limitations (if applicable)		Survey reference (if relating to a wider survey)				
Grid reference		Habitat parcel reference				
Condition Assessment Criteria						
Indicator		Good (3 points)	Moderate (2 points)	Poor (1 point)	Score per indicator	Notes (such as justification)
A	Age distribution of trees	Three age-classes ¹ present.	Two age-classes ¹ present.	One age-class ¹ present.	1	
B	Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland ² .	Evidence of significant browsing pressure is present in less than 40% of whole woodland ² .	Evidence of significant browsing pressure is present in 40% or more of whole woodland ² .	2	
C	Invasive plant species	No invasive species ³ present in woodland.	Rhododendron <i>Rhododendron ponticum</i> or cherry laurel <i>Prunus laurocerasus</i> not present, and other invasive species ³ <10% cover.	Rhododendron or cherry laurel present, or other invasive species ³ ≥10% cover.	3	
D	Number of native tree species	Five or more native tree or shrub species ⁴ found across woodland parcel.	Three to four native tree or shrub species ⁴ found across woodland parcel.	Two or less native tree or shrub species ⁴ across woodland parcel.	2	
E	Cover of native tree and shrub species	>80% of canopy trees and >80% of understory shrubs are native ⁵ .	50 - 80% of canopy trees and 50 - 80% of understory shrubs are native ⁵ .	<50% of canopy trees and <50% of understory shrubs are native ⁵ .	1	



Derek Finnie Associates offers over 30 years of professional ecological expertise to a wide range of clients, principally within the development arena, but also offering advice to the public and voluntary sectors. Based in Wokingham within the Thames Valley, we are ideally located to provide services to developers within the south and south-east of England.

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