

**Preliminary Bat Roost
Assessment**

**34 Downview Close,
Yapton**

**South
Downs
Ecology**

George Sayer
MCIEEM MARBORA

Preliminary Bat Roost Assessment

34 Downview Close, Yapton

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Summary

The applicant has commissioned a Preliminary Bat Roost Assessment (PBRA) of proposals for the extension of an existing dwelling at 34 Downview Close, Yapton, West Sussex, hereafter referred to as 'the site'.

The PBRA was conducted on 28th November 2025. The site comprises a detached house with surrounding gardens.

The dwelling offers 'negligible' bat roost potential with proposals presenting some limited risk of disturbing nesting birds. With mitigation recommendations followed, the proposals are not considered to have a negative impact upon designated sites, habitats or protected species in accordance with local and national planning policy. The application of enhancements on site would also result in minor net gain and would therefore accord with the relevant Arun Local Plan Policies.

1.0 Introduction

- 1.1 The applicant has commissioned a Preliminary Bat Roost Assessment (PBRA) of proposals for the extension of an existing dwelling at 34 Downview Close, Yapton, West Sussex, hereafter referred to as 'the site'.
- 1.2 The appraisal was completed, and the following PBRA report was completed by George Sayer – *BSc (Hons) Environmental Sciences, PgDip Endangered Species Recovery, MA ArborA, MCIEEM, NE Licence Holder – Bats Level 2 and GCN – Ecologist*.
- 1.3 This appraisal consisted of a site visit to identify existing habitats on site; the habitats have been categorised broadly following the UK Habitats Classification Guidance V2.1 (UKHab Ltd 2023). In addition, an assessment of habitats and structures on the site was made to determine their potential for protected species. Following this an on-site and desktop assessment was undertaken, of the likelihood of National or European Protected Species being present on or near site, and the constraints these may pose on the development proposals.
- 1.4 Based on the results of the appraisal, recommendations for potential ecological enhancements have been provided.

Site Description and Surrounding Area

- 1.5 The site comprises a detached dwelling and surrounding gardens. The site is surrounded by other similar properties to all aspects, and is accessed from Downview Close to the west, with Downview Way to the south.

Proposals

- 1.6 The proposals are for the alteration of the existing dwelling, to add a second pitched storey over an existing flat-roof single-storey element.

2.0 Scope of Appraisal

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

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

3.0 Planning Policy and Legislation

National Planning Policy

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

Local Planning Policy

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

- 3.1 *The Arun District adopted Plan (adopted 2018) Policy H SP2 states development must:*

Protect, conserve or enhance the natural environment, landscapes and biodiversity;

- 3.2 *Policy ENV SP1 states:*

Arun District Council will encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environment through the development process and particularly through policies for the protection of both designated and non-designated sites.

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

Takes account of flood risk and promotes the incorporation of appropriate mitigation measures into new development, particularly Sustainable Drainage Systems that reduces the creation and flow of surface water and improves water quality;

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

a. Proposed development likely to have an adverse effect on land with the designated features of any Site of Biodiversity or Geological Importance as listed in Tables 17.1 - 17.7 or any subsequently designated sites (either individually or in combination with other developments), will not normally be permitted. Consideration will be given to the exact designated features present on the site, their scarcity/rarity and recognition of the protection offered by their existing status. Development on wildlife sites with the highest value will only be permitted exceptionally where the following can be demonstrated:

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

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

iii. There are benefits of primary importance to the environment or iv. There are imperative reasons of overriding public interest. Notwithstanding the above however, the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.

b. In determining any planning application affecting Sites of Biodiversity or Geological Importance the Council will ensure that the intrinsic natural features of particular interest are safeguarded or enhanced having regard to;

i. The European, National or Local status and designation of the site;

ii. The nature and quality of the site's features, including its rarity value; iii. The extent of any adverse impacts on the notified features of interest; iv. The need for compensatory measures in order to re-create remaining features of habitats on or off the site. c. Where appropriate the Council will ensure the effective management of designated sites through the imposition of planning conditions or Section 106 agreements as appropriate.

3.5 Policy ENV DM3 Biodiversity Opportunity Areas states that development shall:

a. Retain and sympathetically incorporate locally valued and important habitats, including wildlife corridors and stepping stones

b. Be designed in order to minimise disturbance to habitats

Development proposals that do not reasonably address opportunities for enhancing these through their design, layout and landscaping or access/management shall not be permitted. Where a development scheme would result in a habitat loss, mitigation measures will be proposed as part of the proposed scheme and such measures agreed with the Local Planning Authority prior to the determination of any planning application. Within Biodiversity Opportunity Areas (BOAs) identified on the Policies Maps or where likely to have an impact on species or habitats within the BOAs, any application for planning permission shall include a properly conducted survey of the presence of that species and habitat and impact(s) that development may have on the BOA.

3.6 Policy ENV DM4 Protection of trees states that:

Development will be permitted where it can be demonstrated that trees protected by a Tree Preservation Order(s), (TPO) identified as Ancient Woodland, in a Conservation Area or contributing to local amenity, will not be damaged or destroyed now and as they reach maturity, unless development:

- a. Would result in the removal of one or more trees in the interests of good arboricultural practice. This shall be demonstrated by the developer following the advice of a suitably qualified person which shall be guided by BS 5837 (2012). Details of any advice received having regard to BS 5837 (2012) shall be submitted, in writing, as part of a planning application; or*
- b. Would enhance the survival and growth prospects of other protected trees;*
- c. The benefits of the proposed development in a particular location outweigh the loss of trees or woodland, especially ancient woodland.*

Where planning permission is granted in any of the above instances, conditions shall be used to ensure that, for any trees which are removed as part of a development, at least an equivalent number of a similar species and age (where practical) are planted on the proposed development site. Sufficient space for replacement trees to mature without causing future nuisance or damage shall be provided. The planting of new trees shall form an integral part of the design of any development scheme. Proper provision must be made for the protection and management of trees or areas of woodland on-site when undertaking development. A management plan shall be provided as part of a planning application in accordance with BS 5837 (2012) in order to ensure that trees are adequately protected during development and appropriately maintained in the future. Conditions for the continued protection of trees on sites shall be included in any planning permission given. Where there are existing trees on or adjacent to a development site, developers shall be required to provide:

- d. Land and tree surveys*
- e. A tree constraints plan*
- f. An arboricultural impact assessment to include a tree protection plan and arboricultural method statement*

These will ensure that development is planned to take a comprehensive view of tree issues at an early stage in the design process and that development works do not have a negative impact on existing trees.

3.7 Policy ENV DM5 Development and biodiversity states that:

Development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site. They shall also however incorporate elements of biodiversity including green walls, roofs, bat and bird boxes as well as landscape features minimising adverse impacts on existing habitats (whether designated or not). Development schemes shall also be appropriately designed to facilitate the emergence of new habitats through the creation of links between habitat areas and open spaces. Together, these provide a network of green spaces which serve to reconnect isolated sites and facilitate species movement. Where there is evidence of a protected species on a proposed development site, planning applications shall include a detailed survey of the subject species, with details of measures to be incorporated into the development scheme to avoid loss of the species. This involves consideration of any impacts that will affect the species directly or indirectly, whether within the application site or in an area outside of the site, which may be indirectly affected by the proposals. All surveys shall be carried out at an appropriate time of year and shall be undertaken by a qualified and, where appropriate, suitably licensed person. All developments shall have regard to Natural England's standing advice for protected species.

3.8 Policy GI SP1 Green Infrastructure and development states:

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

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

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

Legislation

- 3.9 Legislation relating to wildlife and biodiversity of particular relevance to this PBRA includes:
- The Conservation of Habitats and Species Regulations 2017;
 - The Wildlife and Countryside Act 1981 (as amended);
 - The Natural Environment and Rural Communities (NERC) Act 2006;
 - The Hedgerow Regulations 1997;
 - The Protection of Badgers Act 1992;
 - The Wild Mammals (Protection) Act 1996; and
 - The Environment Act 2021.
- 3.10 All species of bat and their roosts are protected under The Conservation of Habitats and Species Regulations 2017 and The Wildlife and Countryside Act 1981. It is an offence to intentionally kill, injure or handle a bat, to possess a bat (live or dead), disturb a roosting bat, or sell or offer a bat for sale without a licence. It is also an offence to damage, destroy or obstruct access to any place used by bats for shelter, whether they are present or not.
- 3.11 All UK bird species are protected against disturbance whilst occupying a nest under the Wildlife and Countryside Act 1981. Developments that could predictably disturb, kill or injure nesting birds could result in an offence. Furthermore, a number of bird species are targets of UK and Local Biodiversity Action Plans and listed as Species of Principle Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. This obligates local authorities to have regard to the purpose of conserving biodiversity with particular emphasis on targeted species.
- 3.12 All other mammals receive general protection against cruelty, inhumane killing or injuring under the Wild Mammals (Protection) Act 1996.
- 3.13 In England, Biodiversity Net Gain (BNG) is mandatory from 12th February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%. This site is considered to be exempt from Mandatory BNG as the proposals are residential.

4.0 Methodology

Desktop Study

- 4.1 A desktop study was conducted using the government 'MAGIC' Map GIS tool; a search was carried out for all international (Ramsar, SAC, SPA) and national statutory designated sites (SSSI, NNR, LNR) within 2.0 km of the site; and non-statutory designated sites within 1.0 km of the site. These have been summarised below and their significance considered in the context of the development proposals. Given the overall scale and nature of the site and the proposals, a full data search from Sussex Biological Records Centre (SxBRC) was not considered appropriate. This is in accordance with CIEEM current guidance for such projects (CIEEM, 2020).

Site Visit

- 4.2 A site visit was conducted on 28th November 2025, during suitable weather conditions. Habitats were recorded according to the UK-Habs Classification System as described within the UK Habitats Manual, Version 2.01 (UKHab Ltd. 2023).
- 4.3 During the survey any constraints with regard to protected species were considered; the site was considered for its potential for protected species even when signs of these species were not noted at the time of survey.
- 4.4 The building was assessed externally and internally by an experienced, licenced bat surveyor (George Sayer 2018-34434-CLS) for its potential to hold roosting bats; obvious access points or roost features were identified where relevant. Any evidence of bats such as grease marks, bat droppings or urine splashes were noted. The bat roost assessment was conducted following the Bat Conservation Trust – Bat Surveys for Professional Ecologists: Good Practice Guidelines (2023).
- 4.5 Due to the site visit being carried out over one day, it is possible that some signs of protected species may not be apparent within this short timeframe. This is a constraint recognised within best practice guidelines and all reasonable effort has been made to identify evidence of protected species.

Ecological Impact Assessment

- 4.6 The methodology for Ecological Impact Assessment (EclA) follows best practice guidelines set by the Chartered Institute of Ecology & Environmental Management (CIEEM): 'Guidelines for Ecological Impact Assessment' (CIEEM, 2018). This includes identifying the baseline conditions on the site and subsequently rating the potential effects of the development based on the sensitivity and value of the resource affected, combined with the magnitude, duration and scale of the impact (or change). This is initially assessed without mitigation measures, and then assessed again after allowing for the proposed mitigation measures; this provides the residual effects. The assessment is divided into construction effects and longer-term operational effects.

4.7 Each ecological feature within the site has been considered within a defined Geographic context such as:

- International and European;
- National;
- Regional;
- County;
- District;
- Local;
- Site Level; and
- Negligible.

4.8 Based upon CIEEM guidance, value was determined with reference to the following factors:

- Its inclusion as a Designated Site or other protected area;
- The presence of habitat types of conservation significance, e.g. Habitats of Principal Importance (NERC 2006);
- The presence (or potential presence) of species of conservation significance e.g. Species of Principal Importance (NERC 2006);
- The presence of other protected species e.g. those protected under The Wildlife and Countryside Act 1981;
- The sites social and economic value.

4.9 Specifically in the case of bats, the impact assessment has been conducted in accordance with the recently published Bat Mitigation Guidelines (Reason and Wray, 2023).

5.0 Baseline Ecological Conditions and Protected Species Assessment

Desktop Study

Designated Sites

- 5.1 There are no protected and notable wildlife sites, sites of national or international importance nor sites of local importance recorded within 2.0 km of the site.
- 5.2 The site is not within 12.0 km of the Singleton and Cocking Tunnels SAC wider conservation area.

Habitats

Site Assessment

- 5.3 The site is given over to the habitats discussed further below.

u1b5 – Buildings

- 5.4 The site comprises a detached dwelling, and a garden shed, which offer **negligible ecological value** in a broader sense. The potential for the buildings to support protected species is discussed in more detail in Section 6.0.

u1b6 – Developed land; sealed surface

- 5.5 There is a hardstanding path leading to the front door, and a paved path and patio area to the rear. This offers **negligible ecological value**.

u1c – Artificial Unvegetated; sealed surface

- 5.6 There is a gravel parking area to the front of the site. This surface has less than 10% vegetative cover and offers **negligible ecological value**.

u1d 32 46 108 828 847 – Frequently mown vegetated garden with introduced shrub, ornamental pond and scattered trees

- 5.7 There is a frequently mown lawn with ornamental shrub to both the front and rear of the property. Both areas are limited in extent and very species-poor and offer **negligible ecological value**. The plant species present are either non-native or nationally common and offer **negligible ecological value** in the broader sense.
- 5.8 There is a very small raised garden pond of c.2m² which contains goldfish, and several scattered trees in the gardens, including a moderately-large weeping willow in the front. This tree offers **site ecological value** whereas the rest offer **negligible ecological value**.

6.0 Protected Species Assessment

Bats

Desk Study

- 6.1 There are no recorded EPSM Licences within 2.0 km of the site; 2.0 km west of the site lie known barbastelle commuting routes.

Site Assessment

- 6.2 The existing dwelling is brick-built with a pitched gabled roof. The roof is concrete tiled with the tiles being flat and well-sealed. Ridge tiles and gable ends are tightly-mortared, other than a single tile which is raised and appears to function as a vent tile. The front is clad in plastic cladding which is tightly-sealed. The soffits and fascias are wood on the main building. One fascia/bargeboard is rotting with a notable hole in. The hole is large and whilst potentially allowing bats into the soffit, also allows light and air in. The hole is known to be used by nesting starlings.
- 6.3 The building has a loft void. The loft is well-sealed other than one large tear in the felt, exposing the tiles above in the location of the vent tile. The loft contained no evidence of bats or other access points, and no evidence was present beneath the tear in the felt.
- 6.4 A flat-roof single-storey element is present to the south, over which the extension is proposed. This displays a felt roof and plastic fascias which are well-sealed and devoid of evidence of bats.
- 6.5 No evidence of bats was found during the assessment and only two potential access features were noted, neither of which are highly suitable or display any evidence of use. The building is surrounded by other modern dwellings and roads. The building was assigned as having **negligible suitability** to support roosting bats.
- 6.6 A timber shed is present in the garden. The roof is of pitched felt over-covered with a plastic tarpaulin. The building is tightly-sealed, displays no suitable roost features or evidence of bats and offers **negligible suitability**.
- 6.7 The only mature tree present within the site was a weeping willow, which displayed no suitable features for roosting bats. The ornamental shrubs and small pond in the gardens may attract invertebrates and thus light-tolerant foraging bats, but these areas are extremely limited in size and connectivity. The habitat is of **site value** to bats at most.

Birds

Desk Study

- 6.8 A range of bird species are present in the local area due to the presence of woodland, wetland and farmland habitats. Such habitats are limited in the immediate vicinity with the property surrounded by other dwellings and small gardens.

Site Assessment

- 6.9 The gardens offer some limited potential for nesting birds in trees and shrubs. The hole in the house's fascia is reported by the owners to be used regularly by starlings for nesting. The habitats on the site are of **site value** to birds.

Other Species

- 6.10 No protected species were recorded during the assessment. It is noted that the gardens may provide limited commuting and foraging habitat for hedgehogs, if present. Whilst a small pond is present on-site, it is raised and contains a dense goldfish population, and the site is surrounded by residential properties and roads, negating the potential for great crested newts. Common amphibians such as common frog and smooth newt might frequent the pond.
- 6.11 The site is therefore likely of **site value** for hedgehogs and widespread amphibians, and of **negligible value** for other species.

7.0 Evaluation of Impacts and Mitigation

Designated Sites

Potential Impacts

- 7.1 Given the intervening distances, and the nature of the proposals, any impacts upon local designated sites would be of minor magnitude and highly unlikely to occur. Indirect impacts from traffic pollution during construction might cause degradation of the protected sites. This increase in pollution would be minimal, with no increase in such impacts arising in the future. The proposals would have no significant effect upon the Singleton and Cocking Tunnels SAC, the Pagham Harbour Sites nor the Solent Sites.

Mitigation and Compensation

- 7.2 None required.

Residual Impacts

- 7.3 The impacts will be negligible and not significant.

Habitats

Potential Impacts

- 7.4 The extension of the building will not result in the removal of any vegetated habitat or significant risks to trees from excavation, with the extension sitting on top of the existing flat roof. In the absence of mitigation, the proposals would produce dust, noise and light pollution of surrounding garden habitats. Given the minor scale of the works, such disturbances will only have a **site** impact.

Mitigation and Compensation

- 7.5 All construction will be undertaken in accordance with best practice advice with regards to control of dust, noise and emissions. Any chemicals or fuel shall be stored appropriately and on existing surfaces.

Residual Impacts

- 7.6 With mitigation measures followed, the impacts will be negligible and not significant.

Bats

Potential Impacts

- 7.7 The proposed works are highly unlikely to disturb or destroy a bat roost, nor impact individual bats. Only two potential access features were noted, and neither are directly impacted by proposals. Construction noise, dust, lighting and vibration may temporarily lower site suitability for commuting and foraging bats. However, this is likely to be low already due to nearby residential lighting and the absence of mature trees.

Mitigation and Compensation

- 7.8 Any works shall be undertaken with due consideration and measures to minimise dust and noise. No works shall take place externally between 30 minutes before sunset and 30 minutes after sunrise. No external works lighting shall be used. In the first instance, operational lighting shall not be installed unless strictly necessary (e.g. for safety). Any new lighting, if necessary, shall accord with the principles of the BCT/ILP Guidance Note 08/23.
- 7.9 The proposals will not result in the removal of garden or ornamental shrub, so prey availability within these habitats will be retained and proposals will have a negligible impact on foraging bats.

Residual Impacts

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

Nesting Birds

Potential Impacts

- 7.11 The proposed works are highly unlikely to disturb or destroy a bird nest. If the fascia to the gable end is repaired, this might result in the disturbance of or loss of a starling nest, a red-listed species.

Mitigation and Compensation

- 7.12 The proposals will not result in the removal of garden or ornamental shrub, so there will be no impact on foraging or nesting habitat for birds.
- 7.13 Should the fascia be proposed for repair, such works shall avoid the nesting season if at all possible, and in any case shall be immediately preceded by a check for nesting birds. Any active nests must be allowed to fledge before the replacement can occur.
- 7.14 A replacement bird nesting feature suited to starlings would mitigate for any potential loss of nesting suitability.

Residual Impacts

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

Other Species

Potential Impacts

- 7.16 There is the potential to harm hedgehogs should excavations be left uncovered overnight.

Mitigation and Compensation

- 7.17 Any excavations will be covered overnight during the construction phase or, alternatively, a scaffold plank or other suitable ramp will be inserted to ensure any trapped animals can escape.

Residual Impacts

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

8.0 Ecological Enhancements

8.1 The proposals will be expected to demonstrate an overall positive impact on the natural environment as set out in Arun's Local Plan. The following ecological enhancements have been proposed as suited to the location and the proposals and would result in a Biodiversity Net Gain, in accordance with Local and National Policy.

- Addition of one bird box to the existing building – a swift box to the eastern apex or an integrated box to the new portion of the building, in addition to the starling nest box.
- Addition of one bat box to the existing building – an integrated box to the extension or a Manthorpe Bat Ridge would provide a suitable feature.

9.0 Conclusions

- 9.1 Overall, the proposals are considered to represent a negligible impact upon ecology and no further surveys are recommended.
- 9.2 The building offers negligible potential to support roosting bats, and so bats and their roosts are highly unlikely to be disturbed during the proposed works assuming basic avoidance measures are adhered to.
- 9.3 The building offers potential to support nesting birds, but the garden habitats present will be unaffected by the proposed works. The proposals present some risk of disturbing nesting birds and basic mitigation measures are proposed to avoid this.
- 9.4 The proposals present a low risk of disturbing hedgehogs. However, this can be avoided by following the basic mitigation advice herein.
- 9.5 No significant effects are anticipated upon any designated sites, including the Pagham Harbour Sites, Solent Suite of Sites and Singleton and Cocking Tunnels SAC.
- 9.6 With mitigation and enhancements taken into account, the proposals for the building extension will not negatively affect habitats or protected species and will ultimately result in a net gain. This is in accordance with national and local planning policy.

10.0 References

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11.0 Appendix 1 – Site Photos

Photo 1 – The existing building (front western elevation)



Photo 2 – Rear eastern elevation



Photo 3 – Detail of hole in fascia, known to be used by starlings



Photo 4 – View inside the loft



Photo 5 – Tear in loft felt



Photo 6 – Well-sealed hexagonal hanging tiles



Photo 7 – Rear garden including shed



Photo 8 – Ornamental pond in rear garden



12.0 Site Aerial

