

# Ecological Assessment

**Former Southwick Football Club**

**Old Barn Way, Southwick**

**Report for Adur and Worth Council**

**December 2025**

**Our Ref.: ESBN42 620**



# Quality Assurance

|          |                              |
|----------|------------------------------|
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| Reviewed | December 2025                |
| Date     | Final                        |
| Version  | V1                           |

## About Us

Bakerwell Limited has two offices, led by directors Fiona Baker and Donna Popplewell. The Directors have collectively 28 years' experience in the ecological consultancy industry, hold relevant degrees, are qualified botanists, river corridor assessors and are trained in the use of biodiversity metrics to calculate no net loss/gain.

All staff are members, or training to be members, of the professional body for the environmental industry, the Chartered Institute of Ecology and Environmental Management (CIEEM) and hold Natural England European protected species licences for great crested newts, bats, beavers and dormice. Bakerwell Limited has SMAS Worksafe Health and Safety Accreditation; all staff hold relevant CSCS cards.

Bakerwell Limited is a consultancy specialising in ecological planning advice and surveys. Bakerwell also work in collaboration with trusted associates to provide Landscape Architecture, Arboriculture and Energy assessments.

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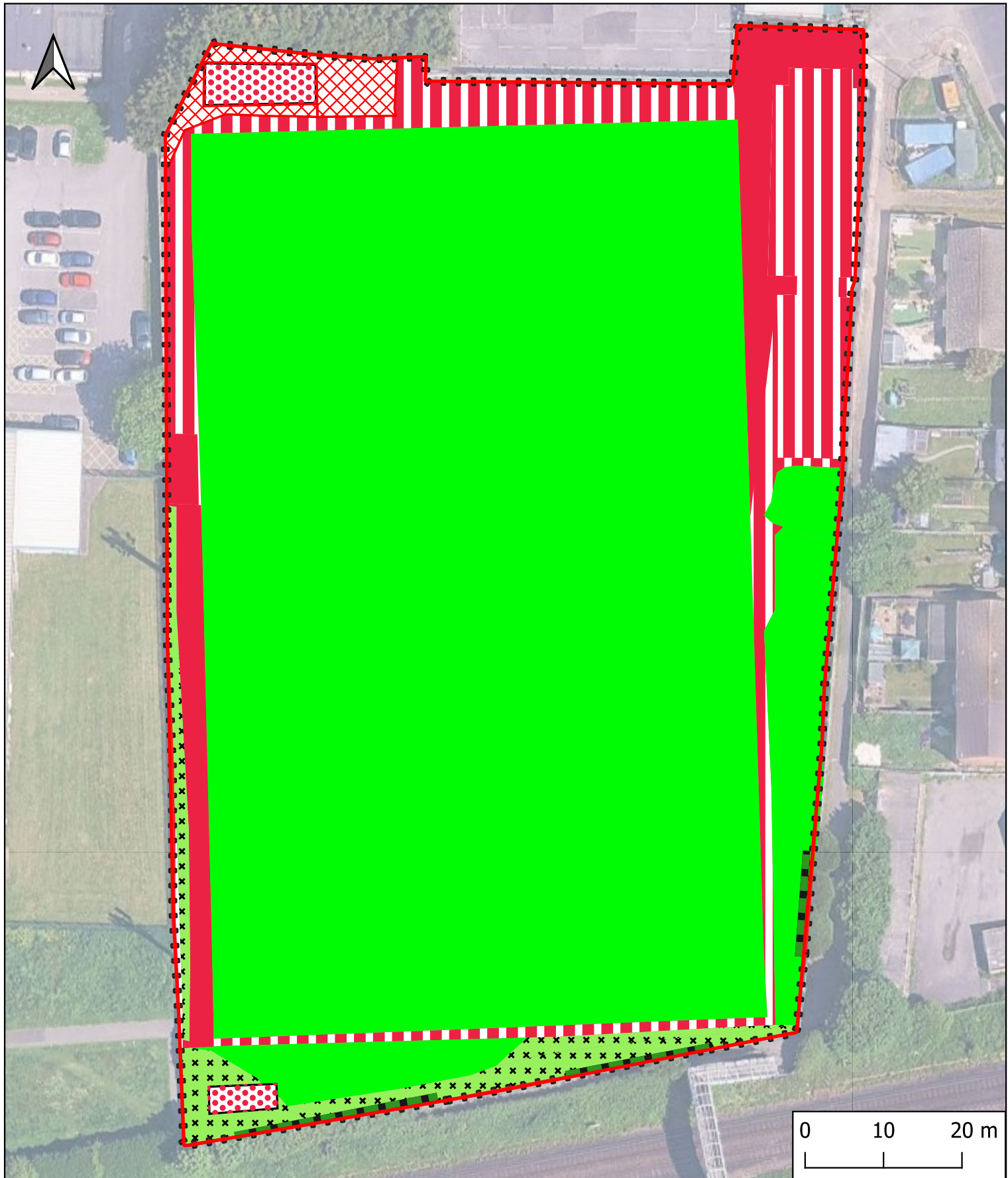
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**Figure 1: Updated UKHabs Habitats on Site - 2025**

Site: Former Southwick FC  
Date: December 2025  
Job: ESNB42 620  
Reviewer/Author: GR/FB

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**Key**

- |                                                                                                                         |                                                                                                                           |
|-------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
|  Site Boundary                       |  ub17 - Ruderal/ephemeral above urban |
|  g4 - Modified Grassland             |  g16 - Tall herb                      |
|  u1f - Sparsely Vegetated Urban Land |  w1174 - Line of Trees                |
|  u1b - Developed Land Sealed Surface |  u1e - Built Linear Feature           |
|  u1b5 - Buildings                    |                                                                                                                           |



**Figure 2: Updated 2025 - Protected Species Potential on Site**

Site: Former Southwick FC  
Date: December 2025  
Job: ESB42 620  
Reviewer/Author: GR/FB

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**Key**

- Site Boundary
- Remaining Building Sections - 2025
- Remaining Storage Unit - 2025
- Bat Building 2023  
- Demolished in 2025
- Bat Building 2023  
- Removed in 2025
- Reptile Habitat - Updated 2025

**Reptile Refugia - 2023 Results**

- Slow Worm Recorded - 2023
- No Reptiles Recorded - 2023
- Reptile Habitat - 2023



**Figure 3: Mitigation and Enhancement - Based on 2023 Results**

Site: Former Southwick FC  
Date: July 2023  
Job: ESN42 620  
Reviewer/Author: SA/FB

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### Key

- Site Boundary
- Option 1
- Option 2
- Wildflower Meadow Planting
- Protected Grassland Corridor
- Integrated Bat Brick
- Tree-mounted Bird Box
- Invertebrate House
- ⌒ Hibernacula
- Log Pile
- Hedgehog Highway
- Reptile Exclusion Fencing
- Native Tree planting

# 1 Executive Summary

- 1.1 This Ecological Assessment (EA) provides the results of surveys undertaken in 2023 at Former Southwick Football Club, Southwick, West Sussex. A Preliminary Ecological Appraisal (PEA) and subsequent bat and reptile surveys were undertaken in July 2023.
- 1.2 Bakerwell Ltd were commissioned by CityZen on behalf of Adur and Worthing Council to provide an update site walkover in 2025 to assess any changes to the habitats on site and any subsequent recommendations. Further surveys have been recommended to facilitate the continuation of the development.
- 1.3 In 2023, the PEA survey identified potential for roosting bats, reptiles, and breeding birds thus further surveys were instructed.
- 1.4 No signs of roosting bats were observed during the surveys in 2023. No bat calls were recorded within, or within the vicinity of, the site. As no roosting bats were recorded no further bat surveys are required A precautionary endoscopic inspection prior to the remaining demolition required has been recommended for remaining low potential sections of building on site.
- 1.5 A peak count of 18 adult slow worms, consistent with a 'Good' or 'High' population, was recorded within the site in 2023. In 2025, additional areas of the site have been identified as having suitability for reptiles and therefore update reptile surveys have been recommended to inform appropriate mitigation measure updates.
- 1.6 Minimum mitigation measures required to avoid or mitigate harm to the slow worm population as of 2023 during construction are outlined in Section 8 of this report, the survey in 2025 found that due to lack of management since 2023 more of the site has become suitable for reptiles, update reptile surveys are therefore required in 2026. This will be further detailed in an Ecological Mitigation Strategy (EMS) as a condition of planning the decision that will be informed by update reptile surveys in 2026. Precautionary measures have been recommended for bats as an endoscopic inspection to remaining building remnants on site, as well as nesting birds during construction in Section 8.
- 1.7 Provided the measures detailed within this report are implemented, there will be no significant impact to any protected species as a result of the development.

## 2 Introduction

- 2.1 Bakerwell Limited were commissioned by PWA Planning, the applicant, to undertake an Ecological Assessment (EA) of land at former Southwick Football Club, Old Barn Way, BN42 4NT (henceforth referred to as the site). The EA comprises an online desk study, a UK Habitat Classification, and assessments of the potential for the habitats on site to support protected species including bat building and tree roost, reptile, and breeding bird assessments.
- 2.2 The PEA identifies the broad habitat types on and in the vicinity of a given site; it aims to identify habitats, species or the potential for species that are protected by European and UK law, are nationally or locally rare or add biodiversity value. The report provides recommendations to ensure that the development is compliant with UK and EU legislation, that any impacts to protected species are mitigated, and biodiversity enhancements are incorporated into the development.
- 2.3 The proposed development site is located in Southwick, West Sussex. The central O.S. grid reference is: TQ 25030 05369. The site is approximately 1.1 ha in area, formed of an overgrown sports field, hardstanding, buildings, modified grassland, and ruderals. The site is towards the south of the town, surround by residential land to the north, east, and, beyond a railway line, south. Commercial and recreational grounds lie west of the site. Further afield, a canal extending from the river Adur is south of the site. This remains the same in 2025.
- 2.4 The northern site boundary is demarcated by wire fencing. The eastern and western boundaries are formed of brick walls. The southern boundary is defined by a line of trees in front of a wall and wire fencing attached.
- 2.5 The design of the development includes the demolition and reconstruction of the sports facility buildings, reorientating the sports pitch, and laying hardstanding around the pitch.
- 2.6 This report has been compiled to follow the British Standard 42020 Code of Practice for Planning and Development and the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Preliminary Ecological Appraisal (2018) and Guidelines for Ecological Report Writing (2017).
- 2.7 Recommendations within this report aim to demonstrate the approved development will conserve and enhance biodiversity in accordance with Chapter 15 of National Planning Policy, Section 174.

### 3 Aims and Objectives

3.1 The aim of this assessment is to undertake a desk and field-based ecological assessment of the proposed development site to identify the habitats present, evidence and potential for the presence of protected species on or in the immediate vicinity of the red line boundary, and any likely direct or indirect effects of the proposed development to the on-site and off-site habitats or potentially present protected species. The objectives of the surveys are to:

- Identify and categorise the broad habitats present on site.
- Identify presence of, or the potential for, protected species.
- Identify any impact to designated ecological sites.
- Provide recommendations for protected species survey, where potential exists.
- Provide outline recommendations for mitigation and enhancements.
- To provide the above in the context of legislation, local planning policy and evaluation of any potential impacts.

### 4 Methodology

#### Desk Study

- 4.1 Desk studies are conducted to ascertain which habitats and species are or have been recorded on or within the surrounds of a proposed site. This information highlights areas of local ecological importance and provides an indication of which habitats and species may be expected to be in the vicinity. The desk study also identifies statutory and non-statutory sites that are important for nature conservation within the locality and facilitates an assessment of the potential direct and/or indirect impacts a development may have on these areas.
- 4.2 An in-house online desk study was completed using data acquired from [www.MAGIC.gov.uk](http://www.MAGIC.gov.uk) interactive maps, managed by Natural England, Adur District Council's website, and Google Maps accessed on 30 June 2023. The desk study identified statutory designated sites, impact risk zones (IRZ) of such sites, and granted European Protected Species Mitigation Licences (EPSMLs). This information is used to assess the potential for direct or indirect impacts that may occur as a result of the development. The data sets are updated irregularly by Natural England and therefore may not provide complete and up-to-date records.
- 4.3 Records of designated statutory and non-statutory sites within 2km of the site were obtained from Sussex Biological Records Centre (SxBRC). Records of protected, rare, scarce, and invasive non-native species, in addition to species of conservation concern within 2km, bird records within 1km, and bat records within 5km of the site, were

provided. For consistency, only records from observations within the last 10 years are discussed within this report.

#### **UK Habitat Classification**

- 4.4 Bakerwell Limited undertook a UK Habitat Classification survey on 21st June 2023. The survey was carried out by Sam Ashby who identified habitats present, following the standard UK Habitat Classification methodology (Butcher, 2020). The site was surveyed on foot and existing habitats and land uses were recorded on an appropriately scaled map. An update UK Habitat Classification survey was conducted by Georgia Robertson on 20<sup>th</sup> November 2025 following updated UK Habitat Classification methodology (UKHab Ltd, 2023)

#### **Protected Species Assessment**

- 4.5 During the PEA survey conducted on 21<sup>st</sup> June 2023, Sam Ashby assessed the habitats on site for their potential to support protected species. Any evidence of protected species or areas of ecological interest were plotted as Target Notes on Figure 1. Potential for protected species, invasive species, and any further survey requirements to clarify this, are discussed in the results section of this report. In 2025, any changes to the potential to support protected species on site were recorded and subsequent implications and recommendations are discussed in the results and mitigation section of this report.

#### *Bat Roost Assessment*

##### Buildings

- 4.6 An inspection of four buildings prior to demolison for the proposal. The buildings were inspected on 21st June 2023 to assess the potential for, or evidence of, roosting bats. An update inspection took place on 20<sup>th</sup> November 2025 of the remaining building section.
- 4.7 External assessments of the buildings were undertaken in full sunlight from ground level using binoculars and a high-powered torch where necessary to assess potential bat roosting suitability. Potential Roosting Features (PRFs) include lifted roof materials such as tiles, flashing, or felt, and gaps in the building structure, for example under the eaves, in the soffits, roof apex and external beams, and around doors and windows (Table 1). Where present, these features were recorded as Target Notes on Figure 1.

Table 1: Potential Bat Roosting Features and Evidence

| Potential Bat Roosting Features                                                                                                                                                                                                                                                                                                                                                             | Signs Indicating Possible Use by Bats                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| In trees <ul style="list-style-type: none"> <li>Natural holes</li> <li>Woodpecker holes</li> <li>Cracks/splits in major limbs</li> <li>Loose bark</li> <li>Hollows/cavities</li> <li>Dense epicormic growth</li> <li>Bird and bat boxes</li> </ul>                                                                                                                                          | <ul style="list-style-type: none"> <li>Live, dead, or skeletons of, bats</li> <li>Feeding remains e.g. insect wings</li> <li>Tiny scratches around entry point</li> <li>Urine staining around entry point</li> <li>Bat droppings in or around entry points</li> <li>Audible squeaking at dusk or in warm weather</li> <li>Flies around entry point</li> <li>Distinctive smell of bats</li> <li>Smoothing of surfaces around cavity</li> </ul>                                                                                  |
| In buildings <ul style="list-style-type: none"> <li>Gaps around windows / doors</li> <li>Gaps between mortar / brickwork</li> <li>Gaps under cracked / broken / missing ridge tiles, roof tiles and hanging tiles</li> <li>Gaps under lead flashing and between roofing felt flaps</li> <li>Large roof void</li> <li>Gaps into soffits, barge boards, gable ends and under eaves</li> </ul> | <ul style="list-style-type: none"> <li>Live, dead, or skeletons of, bats</li> <li>Bat droppings in the roof void (particularly below ridge beam and apex)</li> <li>Feeding remains e.g. insect wings</li> <li>Tiny scratches around entry point</li> <li>Urine staining around entry point</li> <li>Bat droppings in or around entry points</li> <li>Audible squeaking at dusk or in warm weather</li> <li>Flies around entry point</li> <li>Distinctive smell of bats</li> <li>Smoothing of surfaces around cavity</li> </ul> |

- 4.8 A search for evidence of use by bats was also conducted; looking for individuals or dead animals, droppings, tiny scratches, urine staining, flies, smoothing of surfaces around access points, a bat distinctive smell and in warm weather any audible squeaking. The roof areas were then assigned a category of potential suitability as a bat roost as shown in Table 2.

Table 2: Categories for Bat Roosting Potential in Structures after (BCT, 2023)

| Potential Suitability | Description                                                                                                                                                                                                                                                    |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| None                  | No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/ suitable shelter at all ground/ underground levels).                                                                          |
| Negligible            | No obvious habitat features on site likely to be used by roosting bats, however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion. Limited connectivity to wider landscape with other bat habitats. |

| Potential Suitability                                                | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Low                                                                  | A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. Does not provide enough space, shelter, protection, appropriate conditions and/ or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/ stable hibernation site, but could be used by individual hibernating bats). Limited connectivity to wider landscape with other bat habitats. |
| Moderate                                                             | A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation- the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed). Connected to wider landscape with good foraging habitat.                           |
| High Potential                                                       | A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts e.g. maternity of classic cool/ stable hibernation site. Well connected to good foraging habitat and known roosts nearby.                                                        |
| Confirmed Roost category used in association with building potential | PRFs with evidence of use present, observation or previous records of bats confirmed to be roosting.                                                                                                                                                                                                                                                                                                                                                                                                                            |

### Trees

- 4.9 An inspection of the trees on site and directly adjacent to site boundaries was undertaken on 21st June 2023 to assess the potential for, or evidence of, roosting bats. The inspection followed the Bat Conservation Trust (BCT) Good Practice Guidelines 3rd edition (2016) survey methodology. Trees were assessed in full sunlight from ground level using binoculars and a high-powered torch where necessary to assess potential bat roosting suitability, including natural holes, hollows, and cavities (cracks and splits), loose bark, and epicormic and ivy growth.
- 4.10 Trees were assessed in full sunlight from ground level using binoculars and a high-powered torch where necessary to assess potential bat roosting suitability, including natural holes, hollows, and cavities (cracks and splits), loose bark, and epicormic and ivy growth. A search for evidence of use by bats was also conducted as above, see Table 1.
- 4.11 No changes in roost suitability were recorded in 2025, however trees were assigned updated roost suitability categories, in line with Bat Conservation Trust (BCT) Good Practice Guidelines 4th edition (2023) survey methodology.

*Table 3: Categories for Assessing the Suitability of Trees for Bats (BCT, 2023)*

| Suitability | Description                                                                                                                                                                                                                |
|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| None        | Either no PRFs in the tree or highly unlikely to be any.                                                                                                                                                                   |
| FAR         | Further assessment required to establish if PRFs are present in the tree.                                                                                                                                                  |
| PRF         | A tree with at least one PRF present (PRF-1 features suitable for 1 – small number of bats, PRF -M features suitable for multiple bats, including tree or group of trees with multiple PRF-1 (possible maternity colony)). |

### *Bat Emergence Survey 2023*

- 4.12 A single dusk emergence survey of buildings B1, B2, and B3 (Figure 2) was completed by Fiona Baker (Natural England bat survey license CL 18 - 2015 - 12847- CLS-CLS, Level 2), Sam Ashby, Georgia Robertson, Minty Spooner, and Voy Bach on 18<sup>th</sup> July 2023. The survey was conducted in accordance with Collins (2016), in suitable weather conditions. Calls were recorded using Echo Meter Touch (EMT) recorders with Apple iPad devices.
- 4.13 The EMT automatically identifies calls in the field, using the Kaleidoscope Pro Bat Auto-identification software. However, auto identification is designed for records of single bats in free flight and uncluttered (e.g. open fields) environments and is not appropriate for roost emergence, multiple bats, cluttered environments (e.g. among tall vegetation) or social calls. Calls were therefore further analysed in line with published guidance (Reason *et al.* 2016) using Kaleidoscope.

- 4.14 Analysis of bat calls may not always provide a confident conclusion of the species recorded due to the overlap in range of peak frequencies of some species and the way that calls may change within cluttered environments. BCT (2016) highlights that published literature has shown that identifying *Myotis* species with confidence without observing species specific behaviour is extremely difficult (Parsons and Jones 2000; Walters *et al.* 2012). Where a confident conclusion could not be drawn as to the species, calls were identified to genus level such as *Myotis* spp.

#### *Reptile Habitat Assessment*

- 4.15 The habitats on site were assessed for their potential to support reptiles. Features suitable for hibernation, basking, feeding, and raising young are considered. Suitable reptile habitats on site are denoted on Figure 2. The suitability for reptiles on site was updated in 2025 based on changes in on site habitats recorded

#### *Reptile Survey 2023*

- 4.16 Sam Ashby and Lorna Scott completed reptile presence/absence surveys comprising seven visits in July 2023. Reptile refugia (roofing felt 1m x 0.5m) were laid in transects, at a density of 17 per hectare, across the development site. Surveys commenced two weeks following distribution of the refugia, to allow reptiles to become familiar with their presence. Visits were conducted in suitable weather conditions (temperatures between 9-18°C), in accordance with Froglife (1999). Results are shown on Figure 2.
- 4.17 Where reptiles are found, the maximum count of adults found on a single survey (the peak count) can be used to estimate population size; this is based on an extended survey with an additional 13 visits (Froglife 1999). However, additional visits may not be a proportionate approach where they are unlikely to significantly change the results.
- 4.18 Population sizes may be estimated according to two methodologies; the Froglife (1999) survey methodology is based on 10 refugia per ha, therefore where more are used to ensure coverage of good quality habitat, the peak count is adjusted to account for the increase in survey effort. HGBI (1998) methodology uses the density of individuals per hectare of suitable habitat to assess population size; the peak count of individuals is divided by the size of suitable habitat.
- 4.19 The results are then compared with the tables below to give a representative population size (Table 4).

Table 4: Reptile Population Estimates (HGBI 1998; Froglife 1999)

| Froglife (1999) Population Size Estimates |                          |                           |                                  |
|-------------------------------------------|--------------------------|---------------------------|----------------------------------|
| Species                                   | Adjusted Peak Count / ha |                           |                                  |
|                                           | Low Population (Score 1) | Good Population (Score 2) | Exceptional Population (Score 3) |
| Adder <i>Vipera berus</i>                 | <5                       | 5-10                      | >10                              |
| Grass snake <i>Natrix helvetica</i>       | <5                       | 5-10                      | >10                              |
| Common lizard <i>Zootoca vivipara</i>     | <5                       | 5-20                      | >20                              |
| Slow worm <i>Anguis fragilis</i>          | <5                       | 5-20                      | >20                              |
| HGBI (1998) Population Size Estimates     |                          |                           |                                  |
| Species                                   | Adult Peak Count / ha    |                           |                                  |
|                                           | Low Population           | Medium Population         | High Population                  |
| Adder                                     | <2                       | 2-4                       | >4                               |
| Grass Snake                               | <2                       | 2-4                       | >4                               |
| Viviparous lizard                         | <20                      | 20-80                     | >80                              |
| Slow worm                                 | <50                      | 50-100                    | >100                             |

- 4.20 The Key Reptile Site Register is designed to allow the safeguard of important reptile sites. Based on Froglife (1999) criteria, this can provide an objective evaluation of the importance of the reptile populations on a site.
- 4.21 To qualify for the Key Reptile Site Register the site must either a) support three or more reptile species; b) support two snake species; c) support an exceptional population of one species, d) support an assemblage of species scoring four or more according to Froglife (1999) population estimates (Table 3); e) be of particular importance due to local rarity.

#### Breeding Birds

- 4.22 Habitats on site were assessed for their suitability to support nesting and foraging birds. Any birds or nests observed during the survey were recorded, shown on Figure 1, and will be discussed in Section 5. An update assessment was conducted in 2025.

#### Other Species

- 4.23 The in-house desk study included a search for accessible ponds within 250m of the site boundary. Any suitable waterbodies found are subject to Habitat Suitability Index (HSI) (ARG 2010) assessments for great crested newts *Triturus cristatus*.

- 4.24 A search for suitable hazel dormouse *Muscardinus avellanarius* habitat within, and within the vicinity of, the site was conducted during the PEA survey on 21st June 2023.
- 4.25 All habitats within the site boundary and immediately adjacent (where access was possible) were surveyed for evidence of European badgers *Meles meles*. following the methodology recommended by Harris *et al.* (1994), and the Forest Operations and Badger Sett's Guide 9 (Forestry Practice Divisions 1995).
- 4.26 Incidental observations of other, important, or notable species were also recorded, where found these are included in Section 5.
- 4.27 The survey on 21st June 2023 also included a search for the presence of non-native invasive plant species as listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).
- 4.28 All habitat assessments were updated during update site walkover in 2025.

### Ecological Impact

- 4.29 Ecological Impact Assessment (EclA) is most formally used to provide the ecological component of an Environmental Impact Assessment (EIA) required under EIA Regulations. The alternative use of assessing the impact of a proposal to ecology as used for the purposes of this report, is to demonstrate the approved development accords with relevant planning policy and legislation. This approach is recommended by BS42020: 2013.
- 4.30 The impact assessment identifies, quantifies, and evaluates likely significant effects on habitats and species. The methodology used in this assessment broadly follows guidelines in CIEEM (2018). Ecological features are classified in terms of importance at a geographic scale (Appendix 1). Evaluation of impacts follows the mitigation hierarchy; this involves avoiding impacts, mitigating unavoidable impacts, compensation for remaining significant residual effects, and seeking enhancements for biodiversity.

## 5 Limitations

- 5.1 The results of surveys detailed within this report provide evidence of the presence of protected species of flora and fauna, or the potential for such species, evident at the time of the survey.
- 5.2 Due to the transient nature of fauna such as bats and their habitats, the results of these surveys are valid for 18 months from completion (CIEEM, 2019), unless otherwise stated in relation to specific species within this report and unless there is sufficient justification to show otherwise, in line with best practice guidance.
- 5.3 The age of survey data and mitigation considered acceptable by Natural England for the purpose of assessing whether to grant a European Protected Species Mitigation Licence

(EPSML) is subject to change by Natural England at any time. Survey data may need to be updated within the survey season immediately prior to the EPSML application.

- 5.4 Online desk studies are completed using data acquired from [www.magic.gov.uk](http://www.magic.gov.uk) interactive maps, managed by Natural England. Data present has not been updated consistently; reference made to online data is in accordance with the data as is available on Magic at the time of undertaking the search.
- 5.5 Assessment for the presence or absence of invasive species will depend on the accessibility of the habitats on site, and the time of year for example scrub or other dense vegetation will restrict access and visibility. Surveys carried out in winter may not capture plants where leaf growth has not started.
- 5.6 Assessments within this report are based on a site visit and layout provided (Drawing Number 7217\_SK01). Subsequent changes to the layout may result in a requirement to reassess the potential impacts of the development and the requirements for future survey, or avoidance, mitigation, and enhancement measures.
- 5.7 Recommendations for mitigation and enhancements provided within this report are based on the initial findings of habitat and/or protected species surveys undertaken to date, current best practice guidance and legislation in place at the time of writing.
- 5.8 Findings and recommendations within this report are based on the professional opinion of qualified and experienced ecologists and do not constitute professional legal advice.

## 6 Results and Discussion

- 6.1 In this section the results and subsequent implications of the surveys are discussed and assessed in context of previous ecological assessments and the potential impacts of the development. Recommendations for mitigation, in the context of relevant guidance and legislation, are provided in Section 8. A summary of relevant legislation is provided in Appendix 2.

### Desk Study

- 6.2 The immediate surrounding habitats of the site are a fence-lined hedgerow to the north, a line of trees to the south and, beyond this, a railway offering connectivity to residential gardens and recreational grounds.
- 6.3 Designated sites and their distance from the site are summarised in Table 4. Section 41 habitats coastal vegetated shingle, good quality semi-improved grassland, and deciduous woodland are found within 1km of the site.
- 6.4 No ponds were identified within 250m of the site boundary.
- 6.5 This remains unchanged in 2025.

### Statutory Designated Sites

- 6.6 The site is located within 2km of Shoreham Beach Local Nature Reserve and South Downs National Park. The site lies within the Impact Risk Zone (IRZ) for Adur Estuary SSSI (3.43km W of site). Proposals involving aviation or oil extraction within this IRZ require consultation with Natural England (NE) during planning application. The proposed development does not meet these criteria; therefore the Local Planning Authority does not need to consult Natural England in respect of this proposal.

### Non-statutory Designated Sites

- 6.7 There are no non-statutory designated sites within 2km of the site.

Table 5: Statutory Designated Sites Located within 2km of the Site Boundary

| Site Designation/<br>Reference      | Reason for Designation                                                                                                                                                                                                           | Approx. Distance and<br>Direction from Site |
|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| <i>Statutory Designated Sites</i>   |                                                                                                                                                                                                                                  |                                             |
| Shoreham Beach Local Nature Reserve | Vegetated shingle habitat with 155 plant species recorded to date, including the nationally rare starry clover <i>Trifolium stellatum</i> .                                                                                      | 1.88km SW                                   |
| South Downs National Park           | Rich downland with unimproved/semi-improved calcareous grassland, ancient woodland, and riparian habitat. Sustains a rich composition of invertebrates and birds, with several protected reptile, amphibian, and mammal species. | 1.2km N                                     |
| <i>IRZs of SSSI sites</i>           |                                                                                                                                                                                                                                  |                                             |
| Adur Estuary IRZ                    | Saltmarsh habitat at risk of decline. Planning permission required for aviation and oil extraction works within this IRZ.                                                                                                        | 3.43km W                                    |

### Ancient Woodland

- 6.8 The site is located approximately 4.85km (southwest) from the closest area of ancient woodland listed on the woodland inventory as Ancient and Semi-natural Woodland at Withdean Woods, with further Ancient and Semi-natural woodland approximately 5.03km northwest of the site at Old Erringham Farm.

### Priority Habitats

- 6.9 The site is located approximately 650m northeast from the priority habitat coastal vegetated shingle, 550m north of good quality semi-improved grassland, 810m southwest of deciduous woodland, 1.69km south of lowland calcareous grassland, 1.8km southeast of lowland meadows, and 1.83km northeast of priority mudflats.
- 6.10 Connectivity to the wider areas including the continuity of habitat to designated sites is interrupted by the roads and residential areas present which act as dispersal barriers to wildlife in these areas. However, the railway and associated linear habitats immediately south of the site may be used by wildlife commuting to other habitats.
- 6.11 The site is formed of common and widespread habitat types, dominated by modified grassland and urban habitats, and is therefore considered to be of low ecological importance with the exception of the protected species it has the potential to support, bats, reptiles, and breeding birds. Measures will be required for tree protection and Environmental Agency (EA) compliance, see Section 8 for further details.
- 6.12 The proposal offers the opportunity to significantly increase the ecological importance of the site, through the introduction of a wildlife corridor running along the southern boundary which would strengthen connections to off-site habitats; this would be enhanced by landscape features and planting designed to benefit wildlife. Enhancements are discussed further in Section 9.

### Protected, Rare or Species of Conservation Concern

- 6.13 A summary of the relevant records of protected, rare, and species of conservation concern held by SxBRC are provided in Table 6. Records, or absence of such records, for species relevant to the habitats on or adjacent to site from the last decade are discussed below. A summary of bird records is provided in Appendix 6.

*Table 6: Summary of Protected Species Recorded within 2km (5km for bats) of the Site Boundary*

| Species Scientific Name          | Species Common Name      | Number of Records | Distance and Direction (of closest record) from Site |
|----------------------------------|--------------------------|-------------------|------------------------------------------------------|
| <b>Bats (5km)</b>                |                          |                   |                                                      |
| <i>Pipistrellus pipistrellus</i> | Common pipistrelle       | 17                | 2.5km NE                                             |
| <i>Plecotus auritus</i>          | Brown long-eared bat     | 1                 | 4.9km N                                              |
| Unidentified bat                 |                          | 16                | 2.1km E                                              |
| <i>Pipistrellus</i> spp.         | Unidentified pipistrelle | 10                | 3.4km E                                              |
| <i>Eptesicus serotinus</i>       | Serotine                 | 70                | 1.8km N                                              |
| <i>Nyctalus leisleri</i>         | Lesser noctule           | 47                | 4.9km NE                                             |
| <i>Plecotus</i> spp.             | Unidentified long-eared  | 1                 | 2.5km NE                                             |
| <i>Pipistrellus pygmaeus</i>     | Soprano pipistrelle      | 5                 | 2.4km E                                              |

Table 6: Summary of Protected Species Recorded within 2km (5km for bats) of the Site Boundary

| Species Scientific Name         | Species Common Name    | Number of Records | Distance and Direction (of closest record) from Site |
|---------------------------------|------------------------|-------------------|------------------------------------------------------|
| <i>Myotis</i> spp.              | <i>Myotis</i> species  | 3                 | 2.5km NE                                             |
| <i>Nyctalus noctula</i>         | Noctule                | 1                 | 2.7km N                                              |
| <i>Pipistrellus nathusii</i>    | Nathusius' pipistrelle | 1                 | 4.6km NEE                                            |
| <b>Amphibians</b>               |                        |                   |                                                      |
| <i>Rana temporaria</i>          | Common frog            | 18                | 1.1km SE                                             |
| <i>Lissotriton</i>              | Smooth newt            | 20                | 1.8km NNE                                            |
| <b>Reptiles</b>                 |                        |                   |                                                      |
| <i>Zootoca vivipara</i>         | Viviparous lizard      | 51                | 1.7km NE                                             |
| <i>Vipera berus</i>             | Adder                  | 8                 | 0.5km W                                              |
| <i>Anguis fragilis</i>          | Slow worm              | 151               | 0.3km E                                              |
| <b>Mammals (Excluding Bats)</b> |                        |                   |                                                      |
| <i>Erinaceus europaeus</i>      | West European hedgehog | 76                | 0.1km E                                              |
| <i>Muscardinus avellanarius</i> | Hazel dormouse         | 7                 | 1.8km NE                                             |
| <i>Lepus europaeus</i>          | Brown hare             | 5                 | 1.7km NW                                             |
| <i>Oryctolagus cuniculus</i>    | European rabbit        | 1                 | 2.1km N                                              |
| <i>Halichoerus grypus</i>       | Grey seal              | 1                 | 1.9km SW                                             |

### UK Habitat Classification

- 6.14 The site is comprised of g4 - modified grassland, g16 - tall herb communities, w1174 - line of trees, and urban habitats including u1b - developed land, sealed surface, u1b5 - buildings, u1c - artificial unvegetated, unsealed surface, u1e - built linear features, ub510 - sports field, and ub17 - ruderal/ephemeral. Habitat descriptions are illustrated in Figure 1. Photographs of habitats on site are included in Appendix 4. A full list of plant species recorded across the site is provided in Appendix 5.
- 6.15 In 2025, the habitats remain broadly similar, however, the site has not been managed since 2023 and has become increasingly overgrown with habitat extents spreading into furthers areas of the site since the previous survey visit. Changes in habitat condition and extent are detailed below.

#### *g4 – Modified Grassland*

- 6.16 The majority of the site is formed of modified grassland, this habitat type is grassland that is used for amenity purposes or is of low species distinctiveness often due to high levels of management and nutrient enrichment. Modified grassland is found along the eastern and southern site boundaries. This grassland shows signs of previous management but sward length is now considerably longer than that of the sports field. Species identified in this habitat include Yorkshire fog *Holcus lanatus*, creeping

buttercup *Ranunculus repens*, wall barley *Hordeum murinum*, white clover *Trifolium repens*, and ribwort plantain *Plantago lanceolata*

- 6.17 In 2025, the area of modified grassland along the eastern and southern boundaries has extended to the western boundary as well. As the site has been unmanaged for approximately two years, the grassland to the southern and eastern boundaries now supports a significantly longer and more tussocky sward. The modified grassland along the western boundary has a shorter sward height due to more recent establishment, although this area has also not been actively managed. Where modified grassland adjoins areas of tall herb or ruderal habitat, species characteristic of these habitats have begun to colonise the grassland, particularly along the southern boundary where tall herb communities have expanded and established over areas previously recorded as modified grassland.
- 6.18 The sports pitch has not been managed since the previous survey visit and is now considered modified grassland rather than a sports field, as sports pitches require regular management to maintain their function. Although this area has not become as overgrown as the other modified grassland habitats on site, sward height is long and variable across the field. Species remain the same as recorded in 2023

#### G16 – Tall Herb Communities

- 6.19 This habitat exists beneath the line of trees adjacent to the southern site boundary. Species identified here include alexanders *Smyrniololus atratum*, bristly ox-tongue *Helminthotheca echioides*, hedge mustard *Sisymbrium officinale*, and common nettle *Urtica dioica*.
- 6.20 In 2025, this area has further established and is now dominated by common nettle *Urtica dioica* and yarrow *Achillea millefolium*, which have overtaken the majority of the eastern half of the southern site boundary. This area was previously considered modified grassland, with only a narrow strip of tall herb communities recorded immediately adjacent to the treeline. Tall herb species have now extended across this section and have established up to the hardstanding border surrounding the sports field, forming a much denser stand of vegetation than previously recorded. Additional sparse areas of tall herb communities have established over areas previously recorded as artificial unvegetated, unsealed surface and hardstanding particularly to the southwestern corner where gravel surrounds shipping containers and some isolated areas to western boundary where concrete pathways have no longer been subject to regular use.

#### w1174 – Line of Trees

- 6.21 A line of trees exists intermittently along the southern boundary. Species include field maple *Acer campestre*, sycamore *Acer pseudoplatanus*, cypress *Cypripedium* spp., and elder *Sambucus nigra*. This remains the same in 2025.

*u1b – Developed Land, Sealed Surface/u1f Sparsely Vegetated Urban Land*

- 6.22 This habitat includes areas of hardstanding bordering the sports field and extending into the northeastern corner of the site surrounding B4 and B1. This habitat does not support any vegetation.
- 6.23 This remains the same in 2025, however areas to the northeastern corner and hardstanding bordering the field to western boundary and eastern boundary in front of the remaining building footprint have since become sparsely populated by tall herb community species where concrete pathways are no longer in regular use. These areas have been recorded as *u1f – Sparsely vegetated urban land*.

*u1b5 - Buildings*

- 6.24 Five buildings exist within the site: a sports facility formed of three discrete but joined buildings B1 - B3, an open turnstile entrance (B4) and three storage containers (grouped as B5). B1 is of brick construction with plastic fascia below a felt roof; B2 with corrugated metal construction with plastic fascia and felt roof; B3 is formed of wooden boarding with a corrugated roof connecting B1 and B2. The buildings are not currently in use. Further descriptions regarding features suitable for roosting bats can be viewed below in the section 'Bats'.
- 6.25 In 2025, all buildings to the northern and eastern boundaries have been demolished and no longer exist on site. The shipping containers to the southwest corner remain standing. Where buildings B1-B3 have been demolished, hardstanding in the form of tiled and concrete base remains.

*u1c - Artificial Unvegetated, Unsealed Surface*

- 6.26 This habitat includes the woodchip that extends from the southwestern corner of the site towards the northwestern corner surrounding a storage unit. The majority of this habitat does not support any vegetation, though some sections show sparse wall barley and herb species such as bristly oxtongue and alexanders.
- 6.27 In 2025, areas of artificial unvegetated, unsealed surface have been colonised by ruderal and tall herb communities. Over 50% of each area identified as unvegetated has now become established with vegetation, tall herb communities to the southwestern corner and ruderal species to the northwestern corner, therefore this habitat type no longer exists on site.

*u1e - Built Linear Features*

- 6.28 All site boundaries are defined by built linear features; brick walls demarcate the eastern, southern, and western boundaries while the northern boundary is defined by wire mesh and palisade fencing. This remains the same in 2025.

*ub510 - Sports Field*

- 6.29 The sports field is comprised of managed grassland a form of modified grassland. The grassland has been routinely managed and remains in use as a sports facility thus the sward length is short. White clover and Yorkshire fog were identified here.

In 2025, the sports field is no longer in use or routinely managed and has therefore been reclassified as modified grassland. The field now supports a longer and more variable sward height across its entirety, and the sports pitch habitat type is no longer present on site.

*ub17 – Ruderal /Ephemeral*

- 6.30 Immediately south of B2 lies ruderal/ephemeral vegetation including spear thistle *Cirsium vulgare*, hedge bindweed *Calystegia sepium*, common nettle, and common mallow *Malva sylvestris*. Beneath the vegetation lies a pile of construction debris and litter.

- 6.31 In 2025, the area of ruderal vegetation south of B2 has become dominated by grassland species. Where the ground has remained undisturbed for approximately two years, grass species have been able to establish, and this area is now classified as modified grassland.

Where B5 in the north-western corner has been removed, the newly exposed disturbed ground has been colonised by short, patchy ruderal species. These now make up over 50% of the area beneath the tree canopy where the shipping container was previously located.

*Invasive Species*

- 6.32 No invasive species were identified during the PEA site visit. This remains the same in 2025.

*Evaluation of Habitats on Site*

- 6.33 The site is formed of common and widespread habitat types, dominated by modified grassland and urban habitats; therefore, the site is of low ecological importance, with the exception of the protected species it supports, reptiles, and breeding birds. Measures will be required for tree protection, see Section 8 for further details.

- 6.34 The proposal offers the opportunity to significantly increase the ecological importance of the site, through the introduction of a wildlife corridor running parallel to the railway to the south which would strengthen connections to off-site habitats. This section would be enhanced by landscape features and planting designed to benefit wildlife, alongside removal of poor condition trees, and replacement with native species. Enhancements are discussed further in Section 9.

## Bats

- 6.35 Bats, and their roosts, are protected under the EU Habitats Directive (transposed into UK law as the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019), and the Wildlife and Countryside Act 1981 (WCA) (as amended); this protects bats from killing, injury, capture, and disturbance of their roosts from damage, destruction, and obstruction.
- 6.36 The desk study provided no records for bats within the site boundary. However, there were several records of bats within 5km of the site (Table 5).

## Building Assessment

- 6.37 Buildings B1, B2, and B3 were deemed to have low to moderate bat roosting potential due to the features present (Figure 1) according to BCT guidelines; given the site location, poor surrounding habitat with limited foraging opportunities for bats and limited connectivity to further suitable habitat for bats. B4 nor the storage units (B5) offered any roosting potential or notable roosting features. PRFs observed are described in Table 6.
- 6.38 In 2025, all buildings have been demolished and removed with the exception of the shipping container storage units (B5) to the southwestern corner.

Where the B1-B3 building complex has been demolished, small sections of B1 and B2 have been left standing. This seems to be due to health and safety concerns relating to electrics as the remaining building sections appear to be electrical cupboards. Where partial demolition has occurred, the remaining cupboards are damaged. This has left broken soffits and exposed access to wall cavities, as well as holes which provide access internally, all of which provide potential roosting features of bats. Due to health and safety concerns, the remaining sections of building could not be inspected internally.

Table 7. Potential Roosting Features Identified on Site

| Building No. | Description                                                                                       | Potential Roosting Features   | Aspect  | Bat Roost Potential (2023) | Update Description and Bat Roost Potential (2025)                            |
|--------------|---------------------------------------------------------------------------------------------------|-------------------------------|---------|----------------------------|------------------------------------------------------------------------------|
| B1           | Northern section of the sports facility. Brick construction with plastic fascia and roofing felt. | Three holes in plastic fascia | S, W, E | Moderate                   | B1 – Low potential - partially demolished with northeastern corner remaining |

| Building No. | Description                                                                            | Potential Roosting Features                        | Aspect         | Bat Roost Potential (2023) | Update Description and Bat Roost Potential (2025)                                   |
|--------------|----------------------------------------------------------------------------------------|----------------------------------------------------|----------------|----------------------------|-------------------------------------------------------------------------------------|
| <b>B2</b>    | Southern section of the sports facility. Corrugated metal construction.                | Lifted window flashing. Hole between roofing felt. | S<br>SW corner | <b>Low</b>                 | <b>B2 – Low potential</b> - partially demolished with southeastern corner remaining |
| <b>B3</b>    | Section connecting B1 and B2. Wooden construction with corrugated metal roof.          | Roof corrugations are open access on both sides.   | E, W           | <b>Low</b>                 | <b>Demolished – N/A</b>                                                             |
| <b>B4</b>    | Turnstile building. Brick construction.                                                | Open doorways.                                     | S              | <b>Negligible (None)</b>   | <b>Demolished – N/A</b>                                                             |
| <b>B5</b>    | Storage units at the northeast, northwest, and southwest corners of the site boundary. | None.                                              | N/A            | <b>Negligible (None)</b>   | <b>B5 – None</b> - All units removed with the exception of the southwestern corner  |

### Emergence Survey 2023

- 6.39 No bats were seen to emerge from the buildings on site during the survey on 18<sup>th</sup> July 2023. Table 8 describes the conditions under which the survey was completed. There were no bat calls recorded during the survey.

*Table 8: Bat Emergence Survey Conditions*

| Date     | Sunset time | Start time (BST) | End time (BST) | Cloud cover (%) | Temperature (°C) | Wind   | Rainfall |
|----------|-------------|------------------|----------------|-----------------|------------------|--------|----------|
| 18.07.23 | 21:06       | 20:51            | 22:36          | 95              | 18               | 8mph W | 0        |

- 6.40 The design of the development will result in the loss of three buildings with low potential for bat roosts. Survey results relating to bats are considered valid for 12 months.

### *Evaluation of Bats in Light of the Development*

- 6.41 In 2023 no bats were recorded to be roosting in the buildings on site, and therefore demolition of buildings was permitted without a NE EPSML.
- 6.42 In 2025, remaining sections of B1 and B2 provide potential roosting features for bats. As surveys have already been conducted and low potential for roosting bats has been assigned to the remaining structures, a precautionary methodology will be followed which will require an endoscopic inspection for bats immediately prior to final demolition. This is outlined in Section 8.

### **Great Crested Newt**

- 6.43 Great crested newts (GCN), and their breeding/resting places, are protected under; the EU Habitats Directive (transposed into UK law as the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019), and the Wildlife and Countryside Act 1981 (WCA) (as amended). Together these protect GCNs from killing, injury, capture and disturbance, and their breeding/resting places from damage, destruction, and obstruction.
- 6.44 No records of GCN are held within 1km of the site. No licence applications were found within 2km of the site. No suitable waterbodies for GCN were found within 250m of the site and the habitat on site is considered to be unsuitable for GCN. Therefore, GCN surveys are not required and GCN are not discussed further within this report.

### **Dormice**

- 6.45 Dormice and their breeding/resting places are protected under the EU Habitats Directive (transposed into UK law as the Conservation of Habitats and Species

(Amendment) (EU Exit) Regulations 2019), and the Wildlife and Countryside Act 1981 (as amended).

- 6.46 The desk study provided seven records of dormice within 2km distance of the site. However, the PEA survey did not identify any suitable dormouse habitat on site. Therefore, no further surveys are required and dormice are not discussed further within this report.

## Reptiles

### 2023 Survey Results

- 6.47 A peak count of 18 adult slow worms was recorded during the surveys (Table 9). In addition, a peak count of three juvenile slow worms was recorded. No other reptiles were recorded during the surveys. Full reptile survey results are provided in Appendix 7 and illustrated in Figure 2.

Table 9. Reptiles Recorded on Site

| Survey Visit No   | No. Adult Slow<br>Worms | No. Juvenile Slow<br>Worms |
|-------------------|-------------------------|----------------------------|
| 1                 | 11                      | 1                          |
| 2                 | 0                       | 0                          |
| 3                 | 14                      | 3                          |
| 4                 | 14                      | 1                          |
| 5                 | 16                      | 2                          |
| 6                 | 18                      | 1                          |
| 7                 | 15                      | 2                          |
| <b>Peak Count</b> | <b>18</b>               | <b>3</b>                   |

- 6.48 Slow worm observations were recorded within and adjacent to the ruderal habitat south of B2, within modified grassland with longer sward along the eastern boundary, and within the tall herb vegetation along the southern boundary, see Figure 2.
- 6.49 Peak counts are adjusted when the refugia used exceeds 10 per hectare of suitable reptile habitat (Table 10; Froglife 1999). The adjusted peak count counts of slow worm are consistent with a 'Good' population when considered against Froglife (1999) criteria (Table 3; Table 10).

*Table 10. Estimated Slow Worm Population Size According to Froglife (1998) Guidance*

| Refugia | Suitable reptile habitat (ha) | Refugia per ha (rounded up) | Froglife refugia per ha | Division figure | Adjusted peak count                 |
|---------|-------------------------------|-----------------------------|-------------------------|-----------------|-------------------------------------|
| 19      | / 0.09                        | = 211                       | / 10                    | = 2.1           | 18 / 2.1 = 9<br>(‘Good’ Population) |

- 6.50 The population estimate according to HGBI (1998) guidance suggests the site supports a ‘High’ population of slow worms (Table 11).

*Table 11. Estimated Slow Worm Population Size According to HGBI (1998) Guidance*

| Peak Count | Suitable reptile habitat (ha) | Population Estimate (Individuals per ha) |
|------------|-------------------------------|------------------------------------------|
| 18         | / 0.09                        | = 200 (‘High’ Population)                |

- 6.51 Assessment of peak counts against Froglife (1999) confirm that, based on the data collected, this site would not be considered a key reptile site. Based on the results to date, consistency of survey findings, and refugia fidelity (*i.e.* consistent numbers of individuals were found beneath respective refugia), it is considered unlikely that further surveys would significantly change this result.

#### *Update Assessment 2025*

- 6.52 Although reptile surveys were conducted in 2023, the habitat identified as suitable for reptiles was limited to the eastern and southern boundaries. In 2025, this area has expanded to include the full area of the sports field as well as the western boundary. Areas of suitable habitat previously are now more optimal for reptiles.
- 6.53 Therefore, update reptile surveys will be required to understand whether there has been an increase in population size on site, or whether reptiles have colonised further areas of the site. This information will be used to inform appropriate mitigation updates such as minimum length of translocation, as well as receptor area size and location.

#### *Ecological Importance of Reptiles on Site*

- 6.54 Slow worms are common and widespread in Sussex. Therefore, the good/high slow worm population on site in 2023 is considered of local importance. The presence of juveniles suggests the site provides suitable breeding areas for slow worms, therefore update surveys are required to inform a new population assessment

### *Evaluation of Reptiles in Light of the Development*

- 6.55 Reptiles are protected from killing and injury under the Wildlife and Countryside Act 1981 (as amended). There is a possibility of killing and injury of slow worms during site preparation and construction activities. In 2023, the 'Good'/'High' population of slow worms was located to the eastern and southern site boundaries; this is likely due to the shelter provided by the long sward, lack of disturbance, and short grass basking area in conjunction with links to undisturbed habitat along the railway corridor. In 2025, following the identification of further areas suitable for reptiles on site, update surveys are required to identify any changes in population size or colonisation of additional areas on site. Measures provided in Section 8 will be implemented to ensure there will be no significant negative impact to slow worms, however this may require updating after update reptile surveys are complete.
- 6.56 Slow worm ranges are very small, estimated at approximately 50m<sup>2</sup>. The boundary tall herb vegetation and longer grassland will be retained. Incorporating hibernacula into the proposal will provide hibernation habitat for slow worms and a positive long-term impact. Enhancement measures are detailed in Section 9.

### **Badgers**

- 6.57 Badgers, and their setts, are protected in the UK under the Protection of Badgers Act 1992. No badger records were provided in the desk study.
- 6.58 No signs of badgers or their setts were located on, or within the immediate vicinity of, the site during the PEA survey thus further badger surveys were not required. The wall and fence-lined boundaries of the site offer limited permeability, with the push through in the wire fence surrounding the substation being smaller than a badger, thus the site is not considered likely to be currently frequented by badgers. This remains the same in 2025.

### **Breeding Birds**

- 6.59 All active bird nests are protected under the WCA 1981 from damage/destruction. Furthermore, birds that are listed on Schedule 1 of the Act are also protected from disturbance while they are nesting.
- 6.60 No bird records from within the site boundary were provided from the desk study. Records for the following notable birds were found within 1km: kingfisher *Alcedo atthis*, spoonbill *Platalea leucorodia*, quail *Coturnix coturnix*, skylark *Alauda arvensis*, linnet *Carduelis cannabina*, firecrest *Regulus ignicapillus*. The site does not offer suitable habitat to support these species. The full bird results from the desk study are listed in Appendix 6.
- 6.61 Incidental observations of birds on site include carrion crow *Corvus corone*, house sparrow *Passer domesticus*, European magpie *Pica pica*, and wood pigeon *Columba palumbus*. Common swifts *Apus apus* and herring gulls *Larus argentatus* were observed

within the vicinity of the site. Two active bird nests were identified in the line of trees to the south of the site during the PEA survey. In addition, an off-site tree with canopy overhanging the western site boundary holds nesting potential. Recommendations for timing of works to trees and supervision, if required, are provided in Section 8. Enhancements to increase the nesting potential of the site are provided in Section 9. Although no active birds nest were recorded in 2025, suitability of the site for breeding birds and the need for subsequent mitigation measures remains the same in.

### Other Protected Species

#### *Hedgehogs*

- 6.62 The desk study provided 76 records of hedgehogs within 2km of site. The tall herb and ruderal habitats are considered suitable for hedgehogs; while none were observed during the site survey, it is considered possible that they may use the habitat features on-site. There is limited accessibility to site for hedgehogs currently, though wire fence surrounding the substation along the northern site boundary shows a push-through possibly used by a hedgehog. This remains the same in 2025. Precautionary measures are detailed in section 8 and enhancements in Section 9.

## 7 Planning Context

- 7.1 Relevant protected species legislation is given in Appendix 2.

### National Planning Policy

- 7.2 Biodiversity, in particular protected species and habitats, is a material consideration of all planning applications. The National Planning Policy Framework (NPPF) was first published in March 2012 and updated in July 2018, February 2019, July 2021, September 2023, December 2023, December 2024 and again in February 2025. This sets out the government's planning policies for England and how these are expected to be applied.

- 7.3 The NPPF requires that the local planning authority should aim to enhance biodiversity when determining planning applications, and opportunities to incorporate biodiversity in and around developments should be encouraged, especially where this can secure measurable net gains for the environment. Chapter 15 "Conserving and enhancing the natural environment, paragraphs 187-195", states that this should be achieved by:

*"..minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.."*

- 7.4 Chapter 15 of the NPPF covers the natural environment and biodiversity; Chapter 15 is provided in full in Appendix 3.

## Regional/Local Planning Policy

- 7.5 Adur District Council's Local Development Framework, adopted in December 2017, includes the following relevant policies (Adur District Council 2017):

*"Policy 30: Green Infrastructure:*

*Green infrastructure will be protected and enhanced and access to it improved where necessary and appropriate. When considering green infrastructure provision, the ecological characteristics of the area will be taken into account in order to maximise the biodiversity benefits.*

*Developments will be required to incorporate elements of green infrastructure into their overall design, and/or enhance the quality of existing Green Infrastructure as appropriate...*

*All new major developments will need to demonstrate how they will contribute to the implementation of the Green Infrastructure Strategy both at site level and with regard to the wider green infrastructure network.*

*The planting of trees will be supported and encouraged and Tree Preservation Orders will be made to ensure that healthy locally important trees that make a positive contribution to the streetscene are protected."*

*"4.91 - new developments should seek to incorporate elements of green infrastructure into their design where appropriate, for example through provision of green roofs, SuDS, 26 landscaping, tree planting etc."*

*"4.94 - All new developments will be required to take account of and incorporate biodiversity features at the design stage."*

*"4.95 - Conserving biodiversity is not just about protecting rare species and designated nature conservation sites. It also encompasses the more common and widespread species and habitats, all of which make an important contribution to quality of life. The Council will work with partners to conserve and enhance the biodiversity and geological diversity of Adur."*

*"Policy 31: Biodiversity:*

*All development should ensure the protection, conservation, and where possible, enhancement of biodiversity...*

*If significant harm cannot be avoided (by locating development on an alternative site with less harmful impacts), then such harm should be adequately mitigated. Where it cannot be adequately mitigated then such harm must be compensated for. Where it cannot be compensated for, then planning permission should be refused."*

## 8 Mitigation Measures

- 8.1 The following recommendations are provided to ensure no harm will come to protected species residing on or moving through site and to mitigate the loss of habitat to such species. An ecological mitigation strategy will be provided, which will detail full methodologies and technical specifications for fencing installation, habitat clearance, timing of works, and relevant enhancements, and will fulfil condition 13 of the approved planning permission.

### Designated Sites

- 8.2 The site is located within the IRZ of the Adur Estuary SSSI, requiring further planning permission for proposals including oil extraction or aviation. This proposal will not pose these risks to SSSIs; consultation with Natural England is unlikely to be required for this proposal. In addition, the proposal does not comprise residential units thus it is not likely to increase visitor numbers to local SSSIs and other designated sites.

### Habitats

- 8.3 The new requirement for development projects to achieve 10% biodiversity net gain is not due to come into force for small projects until November 2024. However, the NPPF states “opportunities to incorporate biodiversity in and around developments should be encouraged, especially where this can secure measurable net gains for the environment”.
- 8.4 Recent landscape proposals (Drawing Number 7217\_03) indicate the sports pitch will be replaced with artificial grassland, the existing buildings will be demolished and replaced by a sports facility building, areas of hardstanding to the north and southwest of the site will be removed and seeded, and the suitable reptile habitats (Figure 2) will be retained. These retained areas will be designated as protected wildlife corridors. The grassland here will be mown annually only and will be enhanced with native species rich planting. Habitat mitigations are illustrated in Figure 3.
- 8.5 Trees being retained will be protected by Tree Protection Fencing (TPF) to standard BS5837. The advice of an arboriculturalist will be followed to create root protection areas. TPF will be erected prior to any site work and will remain in place until the completion of all construction and landscaping. Materials will not be stored within or against the TPF at any time.

## 9 Enhancement Recommendations

- 9.1 The NPPF requires that the local planning authority should aim to enhance biodiversity when determining planning applications and opportunities to incorporate biodiversity in and around developments should be encouraged.
- 9.2 The following enhancements have been designed to provide new opportunities for species occurring within the local area.
- 9.3 The following enhancements will be detailed within the EMS to be incorporated within the development (Figure 3):
  - Native tree planting to extend and enhance existing treelines.
  - At least two integral bird nesting boxes installed upon the new sports facility building to provide additional nesting opportunities. The placement of these will be designed to encourage use of new habitat features that result from the development. The Ibstock Swift Eco Habitat brick or other suitable products may be used.
  - Installation of two, tree-mounted nest boxes upon the line of trees to the south.
  - Installation of at least one invertebrate box.
  - Integration of two 13 x 13cm holes at the base of boundary walls to the southwest, enabling access to and from the recreational fields for reptiles, amphibians, hedgehogs, and other small mammals. Hedgehog Highway signs will be mounted in proximity. These holes will not be covered at any time.
  - Replacement of hardstanding adjacent to the northern fence boundary with wildflower meadow planting to increase biodiversity on site.
- 9.4 Management of newly created and retained habitat will be undertaken annually to ensure longevity. The wildflower meadow will be cut to 5cm six to eight weeks after sowing, with cuts every two months for the first summer (RHS 2022). A seed mix such as the Meadow Mixture for Loamy Soils (Emorsgate Seeds 2022) is recommended. Once the meadow is established, it will be cut twice a year, once in late autumn and again in winter. Avoiding cutting in the spring and summer will allow the majority of flower species to bloom and drop seed, reducing disruption to their life cycles and increasing the chances of successful wildflower meadow establishment. A sign will be erected to inform visitors of this area and reduce the chances of it being mown.

## 10 Conclusion

- 10.1 In 2023, the site was comprised of common and widespread habitats, predominantly modified grassland, buildings, and associated hardstanding and unvegetated surfaces. In 2025, lack of managed has caused vegetation on site to become overgrown and colonise additional areas of the site. Existing habitats on site in 2025 are predominantly modified grassland, tall herb communities and sparsely vegetated urban land. These habitats are considered to be of low ecological value with the exception of the UK protected reptile species slow worm present on site.
- 10.2 A 'Good' (Froglife 1999) or 'High' (HGBI 1998) population of slow worms was recorded on site in 2023. In 2025, further areas of suitable habitat for reptiles was identified and therefore update surveys are required to inform any changes or additional mitigation requirements to measures outlined in Section 8. The EMS report to be provided as a condition of planning will detail methodology for works required to create a suitable receptor area in response to an assessment of the full restoration works required to boundary walls will be informed by updated reptile survey results.
- 10.3 Birds are confirmed to be using the site for nesting; the line of trees to the south will be retained and mitigation measures will help prevent disturbance of bird nests. Precautionary methodology is provided for hedgehogs.
- 10.4 In the context of relevant biodiversity legislation, providing the measures outlined in Section 8 the approved development will remain compliant with relevant biodiversity legislation.
- 10.5 In the context of Chapter 15 of the NPPF the enhancements in Section 9 of this report will ensure the approved development will remain compliant with this policy.

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## **12 Appendices**

Appendix 1 Level of Importance

Appendix 2 Relevant Legislation

Appendix 3 National Planning Policy Framework (NPPF) Chapter 15

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Appendix 5 Plants Identified on Site

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Appendix 7 Full Reptile Survey Results, 2023

## Appendix 1: Level of Importance

| Geographic Scale                                                                                                                                                                                             | Example                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| International                                                                                                                                                                                                | <p>An internationally designated site<sup>1</sup>, or site which would meet the criteria for such a designation. A viable area of Annexe 1 habitat type, or smaller area essential to maintain the viability of a larger whole.</p> <p>Any regularly occurring population of an internationally important species, threatened or rare in the UK. A regularly occurring, nationally significant population/ number of any internationally important species.</p>                                                                                                                                                                                                                                                                                                                       |
| National                                                                                                                                                                                                     | <p>A nationally designated site<sup>2</sup>, or site which would meet the criteria of such a designation. A viable area of a Habitat of Principal Importance and priority habitats in England (NERC Act 2006) or smaller areas essential to maintain the viability of a larger whole.</p> <p>Any regularly occurring, regionally or county significant population/number of any nationally important species. A feature identified as of Habitat or Species of Principal Importance or Priority habitats</p>                                                                                                                                                                                                                                                                          |
| Regional                                                                                                                                                                                                     | <p>Sites which exceed the County-level designations but fall short of SSSI selection guidelines.</p> <p>Viable areas of key habitat identified in the Regional BAP or smaller areas essential to maintain the viability of a larger whole. Viable areas of key habitat of Regional value in the appropriate Natural Area profile.</p> <p>Any regularly occurring, locally significant population of a species nationally scarce which occurs in 16-100 10km squares in the UK or in a Regional BAP or relevant Natural Area on account of regional rarity or localisation. A regularly occurring, locally significant number of a regionally important species.</p>                                                                                                                   |
| Metropolitan, County, Vice County                                                                                                                                                                            | <p>Semi-natural ancient woodland greater than 0.25ha. County/Metropolitan sites which meet the published ecological selection criteria for designation, including Local Nature Reserves (LNR) selected on County/Metropolitan ecological criteria. A viable area of Habitat of Principle Importance and Priority Habitats in England (NERC)</p> <p>A regularly occurring, locally significant population of a County/Metropolitan "red data book" or LBAP species on account of regional rarity or localisation.</p> <p>A regularly occurring, locally significant number of a County/Metropolitan important species.</p>                                                                                                                                                             |
| District                                                                                                                                                                                                     | <p>Semi-natural ancient woodland smaller than 0.25 ha. Areas of habitat identified in a sub-county (District/Borough) BAP or in the relevant Natural Area profile. District sites that meet the published ecological selection criteria for designation, including LNR selected on District/Borough ecological criteria. Sites/features scarce within the District/Borough. A diverse and/or ecologically valuable hedgerow network.</p> <p>A population of a species that is listed in a District/Borough BAP because of its rarity in the locality or in the relevant Natural Area profile because of its regional rarity or localisation. A regularly occurring, locally significant number of a District/Borough important species during a critical phase of its life cycle.</p> |
| Local                                                                                                                                                                                                        | <p>Areas of habitat considered to appreciably enrich the habitat resource within the context of the parish or neighbourhood (e.g. species-rich hedgerows); and LNRs selected on parish ecological criteria.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <sup>1</sup> Such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or, Wetlands of International Importance (RAMSAR) <sup>2</sup> Such as Site of Special Scientific Interest (SSSI) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

## Appendix 2: Relevant Legislation

| Species                            | Legal Protection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bats, Dormice, GCN                 | <p>All British species of bats, GCN and dormice and their resting and breeding sites, have legal protection under UK and European law (Wildlife and Countryside Act (WCA) 1981 (as amended), and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019)</p> <p>It is an offence to:</p> <ul style="list-style-type: none"> <li>• capture, kill, disturb or injure a dormouse</li> <li>• damage or destroy a breeding or resting place</li> <li>• obstruct access to their resting or sheltering places</li> <li>• possess, sell, control or transport live or dead individuals, or parts of them</li> </ul> |
| Badgers                            | <p>Badgers, and their setts, are protected in the UK under the Protection of Badgers Act 1992.</p> <p>It is an offence to:</p> <ul style="list-style-type: none"> <li>• intentionally capture, kill or injure a badger</li> <li>• damage, destroy or block access to their setts</li> <li>• disturb badgers in setts</li> <li>• treat a badger cruelly</li> <li>• deliberately / intentionally allow a dog into a sett</li> <li>• bait or dig for badgers</li> </ul>                                                                                                                                                                  |
| Reptiles                           | All common reptiles are protected from killing or injury under the WCA 1981, as amended.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Birds                              | All active bird nests are protected under the WCA 1981, as amended from damage/destruction. Furthermore, birds that are listed on Schedule 1 of the Act are also protected from disturbance while they are nesting.                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Invasive Plants                    | Species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) are considered to be invasive. It is an offence to plant or cause these species to grow in the wild.                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Protected plants, fungi or lichens | For plants, fungi or lichens listed on Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) it is an offence to intentionally pick, uproot, or destroy them, unless it could not be reasonably avoided (e.g. the incidental result of a lawful action).                                                                                                                                                                                                                                                                                                                                                                   |
| Section 41 Priority Species        | Regard must be given to the conservation of species listed as rare and threatened species under Section 41 of the Natural Environment and Rural Communities Act (2006) when making planning decisions.                                                                                                                                                                                                                                                                                                                                                                                                                                |

## Appendix 3. NPPF Chapter 15

“The NPPF requires that the local planning authority should aim to enhance biodiversity when determining planning applications, and opportunities to incorporate biodiversity in and around developments should be encouraged, especially where this can secure measurable net gains for the environment. Chapter 15 “Conserving and enhancing the natural environment, paragraphs 187-199”; states that this should be achieved by:

187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

188. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework<sup>65</sup>; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

<sup>62</sup>Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads<sup>66</sup>. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

<sup>66</sup> English National Parks and the Broads: UK Government Vision and Circular 2010 provides further guidance and information about their statutory purposes, management and other matters.

190. When considering applications for development within the National Parks, the Broads and National Landscapes, permission should be refused for major development<sup>67</sup> other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for development, including in terms of any national considerations and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effects to the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

<sup>67</sup> For the purposes of paragraphs 190 and 191, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

#### Habitats and Biodiversity

192. To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity<sup>68</sup>; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation<sup>69</sup>; and;

- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

<sup>68</sup> *Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.*

<sup>69</sup> *Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.*

*193. When determining planning applications, local planning authorities should apply the following principles:*

- a) If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the Site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons<sup>70</sup> and a suitable compensation strategy exists; and*
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”*

<sup>70</sup> *For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.*

*194. The following should be given the same protection as habitats sites:*

- a) potential Special Protection Areas and possible Special Areas of Conservation;*

- b) listed or proposed Ramsar sites<sup>71</sup>; and*
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.*

<sup>71</sup> *Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.*

*195. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site. “*

- 12.1 In addition, this chapter of the NPPF covers ground conditions and pollution, paragraphs directly relevant to biodiversity are summarised below.

*196. Planning policies and decisions should ensure that:*

- a) a site is suitable for its proposed use by taking account of ground conditions and risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);*

*198. Planning policies and decisions should also ensure that the new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise for the development. In doing so they should:*

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise and new development – and avoid noise giving rise to significant adverse impacts of health and the quality of life<sup>72</sup>;*
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*

<sup>72</sup> *See Explanatory Note to the Noise Policy Statement for England (Department for Environment, Food & Rural Affairs, 2010).*

*199. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.*

<sup>62</sup> Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.

## Appendix 4: Site Photographs



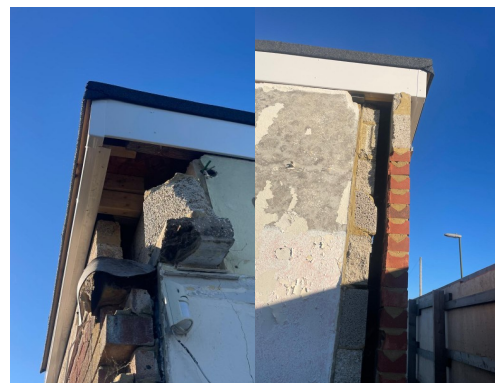
Left: View of the site from the southern boundary with sports field in the centre.

Right: View of the northern site boundary with wall and fence linear features.



Left: View from the southwest corner of the site boundary showing the line of trees, tall herb vegetation, and sports field.

Right: Remaining building section of B1-B3



Left: Remaining building section of B1-B3 and surrounding habitat in north east corner

Right: PRF features in remaining building sections



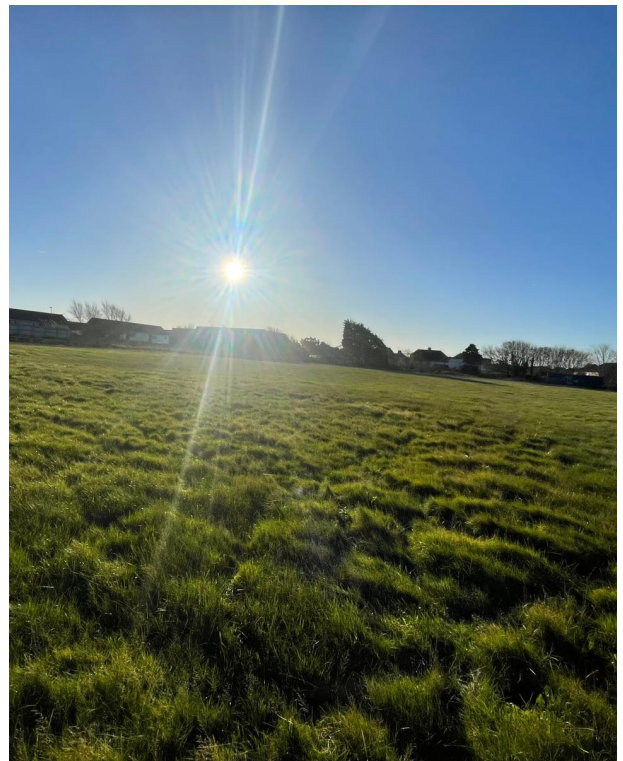
*Left:* Western site boundary with sparsely vegetated urban land and tall herb



*Right:* Southwestern corner with tall herb



*Left:* Southern wall-lined boundary with un-managed modified grassland.



*Right:* Modified grassland sports field view from northwest corner

## Appendix 5: Plants Identified on Site

| Common name        | Species name                     | Habitat                                                                     |
|--------------------|----------------------------------|-----------------------------------------------------------------------------|
| Creeping buttercup | <i>Ranunculus repens</i>         | Modified grassland                                                          |
| Ribwort plantain   | <i>Plantago lanceolata</i>       |                                                                             |
| Yorkshire fog      | <i>Holcus lanatus</i>            |                                                                             |
| White clover       | <i>Trifolium repens</i>          |                                                                             |
| False oat grass    | <i>Arrhenatherum elatius</i>     |                                                                             |
| Wall barley        | <i>Hordeum murinum</i>           | Modified grassland<br>Sparsely vegetated, urban land                        |
| Bristly oxtongue   | <i>Helminthotheca echinoides</i> | Ruderal/ephemeral<br>Tall herb vegetation<br>Sparsely vegetated, urban land |
| Spear thistle      | <i>Cirsium vulgare</i>           | Ruderal/ephemeral<br>Sparsely vegetated, urban land                         |
| Bindweed           | <i>Convolvulus</i> spp.          |                                                                             |
| Common mallow      | <i>Malva sylvestris</i>          |                                                                             |
| Alexanders         | <i>Smyrnium olusatrum</i>        | Tall herb vegetation<br>Sparsely vegetated, urban land                      |
| Hedge mustard      | <i>Sisymbrium officinale</i>     | Tall herb vegetation<br>Sparsely vegetated, urban land                      |
| Common nettle      | <i>Urtica dioica</i>             |                                                                             |
| Rosebay willowherb | <i>Chamerion angustifolium</i>   |                                                                             |
| Yarrow             | <i>Achillea millefolium</i>      |                                                                             |
| Field maple        | <i>Acer campestre</i>            | Line of trees                                                               |
| Sycamore           | <i>Acer pseudoplatanus</i>       |                                                                             |
| Cypress            | <i>Cypressus</i> spp.            |                                                                             |
| Elder              | <i>Sambucus nigra</i>            |                                                                             |
| Holly              | <i>Ilex aquifolium</i>           |                                                                             |
| Ground ivy         | <i>Hedera helix</i>              | Sparsely vegetated, urban land                                              |

## Appendix 6: Bird Records Obtained from SxBRC, 2023

| Scientific Name             | Common Name              | Record Date Range       | Abundance |
|-----------------------------|--------------------------|-------------------------|-----------|
| <i>Anas platyrhynchos</i>   | Mallard                  | 26/05/2015              | 7         |
| <i>Anser albifrons</i>      | White-fronted Goose      | 30/11/2020              | 1         |
| <i>Cygnus olor</i>          | Mute Swan                | 15/12/2014 - 26/05/2015 | 14        |
| <i>Melanitta nigra</i>      | Common Scoter            | 15/05/2020 - 20/02/2021 | 17        |
| <i>Apus apus</i>            | Swift                    | 03/07/2019 - 07/07/2020 | 27        |
| <i>Charadrius hiaticula</i> | Ringed Plover            | 13/05/2014 - 27/05/2016 | 30        |
| <i>Larus argentatus</i>     | Herring Gull             | 13/05/2017 - 13/05/2018 | 75        |
| <i>Larus canus</i>          | Common Gull              | 11/01/2013 - 29/11/2021 | 854       |
| <i>Larus fuscus</i>         | Lesser Black-backed Gull | 17/04/2015              | 2         |
| <i>Larus marinus</i>        | Great Black-backed Gull  | 17/04/2015              | 5         |
| <i>Platalea leucorodia</i>  | Spoonbill                | 09/04/2013              | 2         |
| <i>Columba oenas</i>        | Stock Dove               | 11/04/2020              | 4         |
| <i>Streptopelia turtur</i>  | Turtle Dove              | 25/05/2021              | 1         |
| <i>Alcedo atthis</i>        | Kingfisher               | 21/08/2019              | 1         |
| <i>Coturnix coturnix</i>    | Quail                    | 21/07/2014              | 1         |
| <i>Gavia arctica</i>        | Black-throated Diver     | 05/04/2020              | 1         |
| <i>Gavia immer</i>          | Great Northern Diver     | 19/11/2015 - 24/12/2015 | 10        |
| <i>Gavia stellata</i>       | Red-throated Diver       | 24/10/2013 - 09/02/2019 | 3         |
| <i>Alauda arvensis</i>      | Skylark                  | 18/05/2013              | 2         |
| <i>Emberiza calandra</i>    | Corn Bunting             | 03/05/2020              | 3         |
| <i>Linaria cannabina</i>    | Linnet                   | 23/06/2014 - 13/05/2017 | 7         |
| <i>Loxia curvirostra</i>    | Crossbill                | 05/04/2020              | 1         |
| <i>Phoenicurus ochruros</i> | Black Redstart           | 01/05/2013 - 23/06/2014 | 5         |
| <i>Passer domesticus</i>    | House Sparrow            | 08/05/2016 - 13/05/2018 | 386       |
| <i>Prunella modularis</i>   | Dunnock                  | 26/05/2015 - 20/03/2016 | 2         |
| <i>Regulus ignicapilla</i>  | Firecrest                | 26/05/2015              | 1         |
| <i>Sturnus vulgaris</i>     | Starling                 | 05/01/2015 - 13/05/2018 | 122       |
| <i>Turdus viscivorus</i>    | Mistle Thrush            | 11/04/2020              | 1         |
| <i>Podiceps auritus</i>     | Slavonian Grebe          | 23/02/2014              | 4         |

## Appendix 7: Full Reptile Survey Results, 2023

| Survey No. | Date     | Temperature | Cloud Cover (%) | Rain             | Adult Male | Adult Female | Juvenile | Refugia No.           |
|------------|----------|-------------|-----------------|------------------|------------|--------------|----------|-----------------------|
| 1          | 20.07.23 | 19-20       | 5               | None             | 3          | 8            | 1        | 2/4/5/12/13/14/19     |
| 2          | 21.07.23 | 17          | 80              | None             | 0          | 0            | 0        |                       |
| 3          | 24.07.23 | 16          | 50              | Light            | 2          | 12           | 3        | 2/3/4/6/8/9/10/12     |
| 4          | 25.07.23 | 18          | 75              | None             | 3          | 11           | 1        | 2/3/4/7/9/12          |
| 5          | 26.07.23 | 18          | 100             | None             | 5          | 11           | 2        | 2/4/6/7/11/12/13/15   |
| 6          | 28.07.23 | 20          | 100             | None             | 4          | 14           | 1        | 2/3/4/6/8/11/12/13/15 |
| 7          | 31.07.23 | 18          | 100             | Recently stopped | 6          | 9            | 2        | 2/3/4/5/8/11/15       |