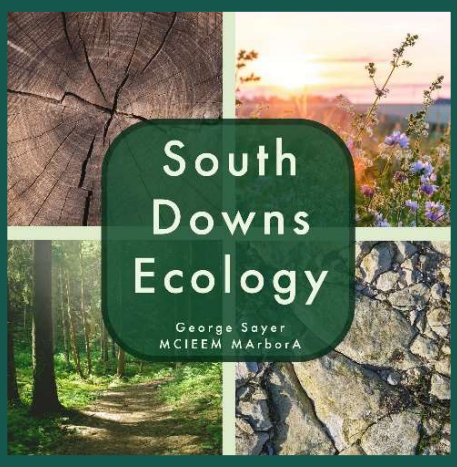
# Ecological Impact Assessment

## Land North of Bank House Farm Alfriston



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## Land North of Bank House Farm, Alfriston

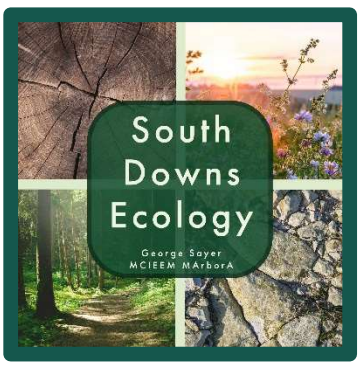
**Document Reference: GS180.Alfriston.EcIA.v1**

**VERSION 1 – 5th May 2024**

**Produced by George Sayer MCIEEM MArborA, South Downs Ecology**

## Contents





**Summary**

Domusea Developments Ltd have commissioned a Preliminary Ecological Appraisal and Ecological Impact Assessment of Land north of Bank House Farm, Alfriston *(TQ 52121 03218, hereafter referred to as 'the site'*).

A Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment was carried out on the 4th August 2023, and updated on 24th April 2024 by George Sayer (*BSc (Hons)* Environmental *Sciences, PgDip Endangered Species Recovery, MArborA, MCIEEM, NE Licence Holder – Bats Level 2 and GCN - Ecologist*).

The proposal area consists of two overgrown garden areas, one of which now consists of broadleaf woodland, and the other consisting of grassland, ruderals and scrub. Several derelict structures are present on the site.

The proposals are for a residential development at the site.

The proposals are not anticipated to have any significant impact upon ecology; the structures are considered to offer 'negligible' bat roost potential. Several trees offer 'low' bat roost potential(now assessed as PRF-Is). With avoidance and mitigation measures the proposals stand a 'low' chance of disturbing commuting or foraging bats or their roosts.

Evidence of mammals was noted at the site; however none of these appeared to be from badger. A single potential but out-of-use badger hole was noted to the east, and monitoring is underway to ensure this is is not re-inhabited prior to construction. The site offers 'low' potential for dormice; proposals are unlikely to disturb dormice and proposals should seek to provide enhancements for dormice.

The site offers some suitability for reptiles; mitigation measures are proposed to protect reptiles and retain their habitat through the proposals. The site offers suitable terrestrial habitat for Great Crested Newts but there is no suitable aquatic habitat in the immediate vicinity.

The site is well used by birds, which can be protected through timed clearance and suitable compensation provided.

No other surveys are currently recommended at the site for these proposals.

The proposals are not considered to have a negative impact upon designated sites, priority habitats or protected species in accordance with planning policy. A biodiversity net gain assessment determines that the proposals would result in a small loss of woodland units. Off-site woodland units would be purchased to achieve a fully-compliant 10% gain. The proposals would therefore accord with the relevant South Downs National Park Local Plan Policies, the NPPF (2021) and relevant legislation.

## 1.0 Introduction

1.1 Domusea Developments Ltd have commissioned a Preliminary Ecological Appraisal of Land north of Bank House Farm, Alfriston (TQ 52121 03218, hereafter referred to as 'the site').

1.2 A Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment was carried out on the 4th August 2023 and updated on 24th April 2024 by George Sayer (BSc (Hons) Environmental Sciences, PgDip Endangered Species Recovery, MCIEEM, MArborA) director at South Downs Ecology.

1.3 The following Preliminary Ecological Appraisal report has been completed by George Sayer (*BSc (Hons)* Environmental *Sciences, PgDip Endangered Species Recovery, MArborA, MCIEEM, NE Licence Holder – Bats Level 2 and GCN - Ecologist*). This appraisal consisted of a site visit to identify existing habitats on site; the habitats have been categorised broadly following the UK Habitats Classification Guidance V2.0 (*UKHab Ltd 2023)*. In addition, an assessment of habitats and structures on the site was made to determine their potential for protected species. Following this an on-site and desktop assessment was undertaken, of the likelihood of National or European Protected Species being present on or near site, and the constraints these may pose on the development proposals.

1.4 Based on the results of the appraisal, recommendations for potential ecological enhancements have been provided.

Site Description and Surrounding Area

1.5 The site consists of a rectangular block of land of c.0.23 Ha. The northern portion was originally grassland garden and the southern portion was possibly used for horticulture or raising animals, but for at least the past 20 years has been relatively well-tree'd.

1.6 The site is located on the eastern edge of the village of Alfriston in the South Downs. To the north is a large dwelling and car park. To the west is the built up area of Alfriston. To the south is the residential land along River Lane. To the east is a footpath, followed by the floodplain habitats of the Cuckmere River. The wider surroundings are largely grazing land and downland with villages, arable land and small patches of woodland interspersed.

1.7 Within 500.0 m there is a large pond which appears to be an old moat, c.330.0 m south. A ditch begins c. 10.0 m east of the site. At its closest point the River Cuckmere is 50.0 m east.

Proposals

1.8 The proposals consist of a new linear residential development of 5no. dwellings, of a style similar to that of the adjacent River Lane development. The access would use the south-western access point, with a footpath link to the east.

## 2.0 Scope of Assessment

1. *Categorise habitats present on the site;*
2. *Identify habitat which may have potential for protected species;*
3. *Identify whether any signs of protected species are present on-site;*
4. *Recommend whether further surveys are required, or whether there are any relevant constraints with regards to protected species;*
5. *Identify potential opportunities and constraints for protected species, habitats and designated sites;*
6. *Provide recommendations as to how the site and proposals could be enhanced with regards to protected species and habitats.*

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

## 3.0 Planning Policy and Legislation

National Planning Policy

3.1 The National Planning Policy Framework (NPPF) 2021 sets out the government planning policies for England and how they should be applied. 'Chapter 15: Conserving and Enhancing the Natural Environment' states that development should be 'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'

3.2 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

Local Planning Policy

3.3 The site sits within the South Downs National Park; The South Downs Local Plan (*2014-2033*) includes the following relevant policies:

- Core Policy SD2: Ecosystem Services 1. Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to: a) Sustainably manage land and water environments; b) Protect and provide more, better and joined up natural habitats; c) Conserve water resources and improve water quality; d) Manage and mitigate the risk of flooding; e) Improve the National Park's resilience to, and mitigation of, climate change; f) Increase the ability to store carbon through new planting or other means; g) Conserve and enhance soils, use soils sustainably and protect the best and most versatile agricultural land; h) Support the sustainable production and use of food, forestry and raw materials; i) Reduce levels of pollution; j) Improve opportunities for peoples' health and wellbeing; and k) Provide opportunities for access to the natural and cultural resources which contribute to the special qualities. 2. Development proposals must be supported by a statement that sets out how the development proposal impacts, both positively and negatively, on ecosystem services;

- Strategic Policy SD9: Biodiversity and Geodiversity 1. Development proposals will be permitted where they conserve and enhance biodiversity and geodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation. Prior to determination, up-to-date ecological information should be provided which demonstrates that development proposals: a) Retain, protect and enhance features of biodiversity and geological interest (including supporting habitat and commuting routes through the site and taking due account of any use by migratory species) and ensure appropriate and long-term management of those features; b) Identify and incorporate opportunities for net gains in biodiversity; c) Contribute to the restoration and enhancement of existing habitats, the creation of wildlife habitats and the creation of linkages between sites to create and enhance local and regional ecological networks; d) Protect and support recovery of rare, notable and priority species; e) Seek to eradicate or control any invasive non-native species present on site; f) Contribute to the protection, management and enhancement of biodiversity and geodiversity, for example by supporting the delivery of GI and Biodiversity Action Plan targets and enhance Biodiversity Opportunity Areas (BOA); and g) Comply with the mitigation hierarchy as set out in national policy.
- Development Management Policy SD11: Trees, Woodland and Hedgerows 1. Development proposals will be permitted where they conserve and enhance trees, hedgerows and woodlands. 2. Development proposals that affect trees, hedgerows and woodland must demonstrate that they have been informed by a full site survey, including an Ecological Survey, Arboricultural Method Statement and associated Tree Protection Plan, and include a management plan. 3. The removal of protected trees, groups of trees woodland or hedgerows will only be permitted in exceptional circumstances and in accordance with the relevant legislation, policy and good practice recommendations. Where protected trees are subject to felling, a replacement of an appropriate number, species and size in an appropriate location will be required. 4. Development proposals must provide adequate protection zones and buffers around hedgerows and other woodland and trees to prevent damage to root systems and taking account of future growth. A minimum buffer of 15 metres will be required between the development and ancient woodland or veteran trees. 5. A proposed loss or damage of non-protected trees, woodland or hedgerows should be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required. 6. Development proposals must demonstrate that appropriate protection measures are in place prior to any work on site throughout the development process as part of acomprehensive landscaping plan, and that suitable opportunities for the restoration, enhancement or planting of trees, woodland, and hedgerows are identified and incorporated. 7. Opportunities should be identified and incorporated for planting of new trees, woodlands and hedgerows. New planting should be suitable for the site conditions, use native species and be informed by and contribute to local character, and enhance or create new habitat linkages.

- Strategic Policy SD45: Green Infrastructure 1. Development proposals will be permitted where they demonstrate that they: a) Maintain or enhance GI assets, GI links and the overall GI network; and b) Provide new GI, or improvements to existing green assets and green linkages, which are integrated into the development design, that meets the needs of communities both within and beyond the site's boundaries. 2. GI proposals must contribute to multifunctional landscapes which: a) Strengthen connectivity and resilience of ecological networks; b) Incorporate GI measures that are appropriate to the type and context of the development proposal as part of an overall landscape design; c) Maximise opportunities to mitigate, adapt and improve resilience to climate change; d) Maximise opportunities for cycling and walking, including multi user routes and, where possible, facilitate circular routes; and e) Support health and wellbeing and improve opportunities for understanding and enjoyment of the National Park and its special qualities. 3. Development proposals that will harm the GI network must incorporate measures that sufficiently mitigate or offset their effects. 4. Where appropriate, the Authority will seek to secure via planning condition or legal agreement provision for the future management and/or maintenance of GI.

3.4 The South Downs National Park Authority released a Technical Advice Note (TAN) in January 2022 detailing how proposals should seek to enhance ecology.

Legislation

3.5 Legislation relating to wildlife and biodiversity of particular relevance to this EcIA includes:

- The Conservation of Habitats and Species Regulations 2017;
- The Wildlife and Countryside Act 1981 (as amended);
- The Natural Environment and Rural Communities (NERC) Act 2006;
- The Hedgerow Regulations 1997;
- The Protection of Badgers Act 1992;
- The Protection of Mammals Act 1996;
- The Environment Act 2021.

3.6 All species of bat and their roosts are protected under The Conservation of Habitats and Species Regulations 2017 and The Wildlife and Countryside Act 1981. It is an offence to intentionally kill, injure or handle a bat, to possess a bat (live or dead), disturb a roosting bat, or sell or offer a bat for sale without a licence. It is also an offence to damage, destroy or obstruct access to any place used by bats for shelter, whether they are present or not.

3.7 All UK bird species are protected against disturbance whilst occupying a nest under the Wildlife and Countryside Act 1981. Developments that could predictably disturb, kill or injure nesting birds could result in an offence. Furthermore, a number of bird species are targets of UK and Local Biodiversity Action Plans and listed as Species of Principle Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. This obligates local authorities to have regard to the purpose of conserving biodiversity with particular emphasis on targeted species.

3.8 All other mammals receive general protection against cruelty, inhumane killing or injuring under the Protection of Mammals Act 1996.

3.9 All widespread reptiles are protected against killing and injury under the Wildlife and Countryside Act 1981, with rarer reptiles receiving further protection under EU regulation. Reptiles must also be given consideration under the NERC Act 2006 as part of the planning process.

3.10 Great crested newts (GCN) are protected under The Conservation of Habitats and Species Regulations 2017. It is an offence for anyone to intentionally kill, injure or disturb a GCN or to damage, destroy or block access to areas of suitable habitat.

3.11 Badgers are protected under the Protection of Badgers Act 1992. It is an offence to harm badgers or disturb badgers and their setts.

3.12 In England, BNG is mandatory from 12 February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%.

## 4.0 Methodology

Desktop Study

4.1 A desktop study was conducted using the government 'MAGIC' Map GIS tool; a search was carried out for all international statutory designated sites (Ramsar, SAC, SPA) within 12.0 km of the site; national statutory designated sites (SSSI, NNR, LNR) within 2.0 km of the site; and non-statutory designated sites (Local Wildlife Sites) and priority habitats within 1.0 km of the site. Any sites of relevance to the proposals are summarized below and their significance considered in the context of the development proposals. Given the nature of the proposals only sites which might be impacted are considered below and this is not an exhaustive list of all sites.

4.2 A search was carried out to identify features of ecological interest in the area, such as water bodies and ancient woodland. Given the overall scale and nature of the site and the proposals, a 2km data search from SxBRC was considered appropriate and undertaken in April 2024. This is in accordance with CIEEM current guidance for such projects.

Site Visit

4.3 A site visit was conducted on 4th August 2023, with a further update visit on 24th April 2024. Habitats were recorded broadly according to the UK-Habs Classification System as described within the UK Habitats Manual V.2.01 (UKHab Ltd 2023). All habitats present on-site were recorded on a UKHab map (Figure No. 01 – Site Habitat Plan).

4.4 During the survey any constraints with regard to protected species were considered; the site was considered for its potential for protected species even when signs of these species were not noted at the time of survey. Areas outside of the site were assessed when possible and relevant to the proposals. Protected and Notable Species considered as part of this assessment include but are not limited to:

- Bats – Foraging, Commuting, Roosting, Swarming and Hibernating
- Badgers – Sett-building, Commuting and Foraging
- Dormice – Nesting and Commuting
- Great Crested Newts and other Amphibians such as Common Toads – Terrestrial Active and Hibernation Habitat and Aquatic Habitat, Including Commuting
- Reptiles – Terrestrial Active and Hibernation Habitat
- Rare or Notable Invertebrates
- Rare or Notable Plants
- Water Voles – Foraging and Shelter Habitats
- Otters – Foraging and Shelter Habitats
- White-clawed Crayfish

4.5 The structures were assessed by an experienced, licenced bat surveyor (*George Sayer 2018-34434-CLS)* for their potential to hold roosting bats; roof voids were assessed where relevant, and access points identified using high power torch; endoscope and binoculars as appropriate. Any evidence of bats such as grease marks, bat droppings, urine splashes were noted. Trees were assessed for features conducive to roosting bats, including knot holes, cavities, flaking

bark, heavy ivy and cracks. The bat roost assessment was originally conducted following the Bat Conservation Trust - Bat Surveys for Professional Ecologists: Good Practice Guidelines (2016) with the update survey in April considering any changes as a result of the new Bat Survey Guidelines (2023).

4.6 The potential opportunities for ecological enhancement, and the constraints posed by existing ecology are discussed in detail in the appraisal.

4.7 Due to the site visit being carried out over two days, it is possible that some signs of protected species may not be apparent within this short timeframe. This is a constraint recognised within the Survey Guidelines and all reasonable effort has been made to identify evidence of protected species.

## 5.0 Baseline Ecological Conditions and Protected Species Assessment

Desktop Study

*Designated Sites and Habitats within 12.0km*

5.1 The following information is included so that the site can be considered within the ecological context of the surrounding area, guiding decisions related to habitat change and protected species; these sites are not necessarily representative of the habitat on or surrounding the site and may not be influenced by the proposals.

5.2 The closest statutory designated site is Firle Escarpment SSSI, 950.0 m north-west. The site is within the Impact Risk Zone (IRZ) of the Firle Escarpment and Seaford to Beachy Head SSSIs, but being under 1Ha and under 50 dwellings would not require consultation with Natural England. The site is within the Sussex Chalk Groundwater nitrate Vulnerable Zone, but is not within the nitrate or water neutrality zones.

5.3 There are no non-statutory sites within 1.0 km. The nearest is c.1.1 km east, to the other side of the Cuckmere River. The next closest is c.1.2 km south-west, to the other side of Alfriston. Proposals would not impact such distant sites.

*Table No. 01 – Statutory Designated Sites*

| ***Site Name*** | ***Reason for designation*** | ***Distance from site*** |
|---|---|---|
| *South Downs National Park* | *1,600km2 of high-value lowland landscape, including farmland, river valleys, ancient woodland and lowland heaths containing a number of small villages and market towns.* | *Site within* |
| *Firle Escarpment SSSI* | *An extensive stretch of chalk grassland on north facing slopes of the South Downs. The diverse flora includes several unusual plants and one that is nationally rare.* | *950.0 m NW* |
| *Wilmington Downs SSSI* | *This site is dominated by the nationally uncommon chalk grassland habitat on the steep escarpment of the South Downs. In addition to a representative chalk flora the site holds two nationally rare invertebrates and several notable ones.* | *1.35 km E* |
| *Seaford to Beachy Head SSSI* | *An outstanding site of national importance for its biological and geological features. The diverse range of habitats includes herb-rich chalk grassland, chalk heath (a unique, rare habitat on chalk soils), maritime grassland, foreshore and chalk cliffs, river meanders, and Greensand reef. Together, these habitats support a number of nationally rare, nationally scarce and nationally significant plants, invertebrates and birds.* | *1.6 km S* |
| *Pevensey Levels Ramsar, SAC* | *The site is one of the largest and least fragmented lowland wet grassland systems in southeast England, including a small area of shingle and intertidal muds and sands. The low-lying grazing meadows are intersected by a complex system of ditches which support rare and scarce aquatic plants and invertebrates (freshwater molluscs and dragonflies Odonata spp) as well as breeding and wintering wildfowl.*<br>*The site supports Anisus vorticulus in both a wide spatial distribution and in good population density classes.* | *8.6 km NE* |

| | | |
|---|---|---|
| *Lewes Downs SAC* | *An isolated block of downland which forms part of the South Downs. The majority of the site comprises unimproved species-rich chalk grassland, developed on steep slopes over thin soils. The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:*<br>*• Semi-natural dry grasslands and scrubland facies: on calcareous substrates (FestucoBrometalia) (important orchid sites). (Dry grasslands and scrublands on chalk or limestone, including important orchid sites)* | *8.9 km NW* |

Habitats

*Desk Study*

5.4 UK Priority Habitats within 2.0 km of the site include coastal and floodplain grazing marsh, reedbeds, river, ancient woodland, traditional orchard, and deciduous woodland. None of these habitats are adjacent the proposals, although the River Cuckmere floodplain grazing marsh is 45.0 m from site at its closest extent.

*Site Assessment*

5.5 The habitats on-site are discussed further below.

*U1b5 - Buildings and Structures*

5.6 The structures affected by the proposals consist of: a collapsed garage (B1); a derelict shed (B2) and a greenhouse (B3). The buildings are in poor condition and offer **negligible ecological value** in a broader sense. The potential for the buildings to support protected species is discussed in the preliminary bat roost and bird assessment below.

*G4 10 16 32 847 – Modified Grassland with Scattered Scrub, Tall Forbs, Scattered Trees, and Introduced Shrubs*

5.7 The northern section of site includes an area once used as garden, now overgrown. Grasses including false oat *Arrhenatherum elatius* and creeping bent *Agrostis stolonifera* are present as are common forbs such as dandelion *Taraxacum officinale agg.*, bristly oxtongue *Helminthotheca echioides* and garden species such as marjoram *Origanum vulgare.*

5.8 The eastern end of the section has been overtaken almost entirely by a dense, tall stand of nettle *Urtica dioica,* to c1.8 m height. By the time of the second visit much of this had been cut down.

5.9 Several patches of bramble *Rubus fruticosus agg.* are present as are large overgrown shrubs including *Pyracantha sp.; Spiraea sp.;* and *Sarcococca sp.* Much of the scrub had been removed by the time of the second visit.

5.10 The area contains trees including holly *Ilex aquifolium,* ash *Fraxinus excelsior,* apple *Malus domestica* and Lawson cypress *Chamaecyparis lawsoniana.* The habitat offers **site ecological value.**

*W1g 31 202 - Other Broadleaved Woodland – Secondary and Young Self-set Trees*

5.11 The larger southern portion of the site appears once to have been used for garden, animals or similar, but for at least the past 20 years (as shown by historical aerial imagery) has been sufficiently tree'd to be classified as woodland. The habitat is dominated by high ash and sycamore *Acer pseudoplatanus,* with understorey of hawthorn *Crataegus monogyna,* elder *Sambucus nigra,* elm *Ulmus minor,* and field maple *Acer campestre.*

5.12 Several large patches of understorey scrub are present, some being bramble and some being blackthorn *Prunus spinosa* and damson *Prunus domestica subsp. Insititia*. A large patch of introduced shrub, formed of shrub honeysuckle *Lonicera nitida* and snowberry *Symphoricarpos albus* is present to the western extent.

5.13 The understorey is not particularly diverse or extensive, but consists of abundant nettle, dominant ground elder *Aegopodium podagraria,* bramble and ivy *Hedera helix.* Shade species such as stinking iris *Iris foetidissima* and lords and ladies *Arum maculatum* are also present.

5.14 Given the predominance of sycamore and the relatively poor structure and diversity, the habitat is not considered a priority habitat and its limited scale and connectivity. The habitat offers **site ecological value.**

## 6.0 Protected Species Assessment

Bats

*Desk Study*

6.1 There are no EPSM Licences for bat species within 2.0 km, probably due to a lack of major development. An EPSM licence for brown long-eared and common pipistrelle is present c.2.5 km south. National Trust Records suggest the nearby Clergy House may be a Natterer's bat roost and Daubenton's and serotine bats have also been recorded along the Cuckmere River. In total, 9no. bat species are recorded within 2.0 km with a total of 105 records. The nearest is for grey long-eared bats, recorded c.125.0m south-west.

*Site Assessment*

6.2 The garage B1 consists of a single garage formed of corrugated tin roof on a wooden frame. The garage has completely collapsed leaving a pile of timbers and corrugated tin. The building offers no roost opportunities. B1 offers **negligible** potential.

6.3 The shed B2 consists of a timber shed with a mesh cage to the side, it is assumed from debris inside that this was once a potting shed with either fruit cage or animal cage. Internally the space is bright and damp from decay, with no roost opportunities or evidence of bats. B2 offers **negligible** potential.

6.4 The greenhouse B3 is a timber framed greenhouse with glass panels to all aspects. Many of the panels are gone and scrub now grows fully within the greenhouse. The structure offers **negligible** potential.

6.5 2no. trees and another group of trees are considered to offer 'low' bat roost potential due to presence of deadwood or small knotholes. Following the latest guidelines the trees are individually considered PRF-Is, with the woodland generally offering a low level of roosting resources. Trees are semi-mature and generally lack roost features.

6.6 The site consists of secondary woodland of relatively low diversity. The sycamores and ash are likely to be a source of foraging for low numbers of bats. This might include light-averse species and species using the river, although the site is only connected to habitats on its eastern extent. The grassland and scrub would likewise be suitable for small numbers of bats. At most the site is of **local value.**

Birds

*Desk Study*

6.7 Numerous bird species are present in the local area, including a number of farmland species and species which use the floodplains and riparian habitats. In total, 1001 notable bird records are present within 2.0 km.

*Site Assessment*

6.8 No evidence of birds was found within the buildings on-site. The trees and scrub were suitable for nesting with pigeons noted and a bird of prey was noted calling regularly and believed to be a sparrowhawk. Overall, the site is of **site value** to birds. Species such as treecreeper and woodpecker might use trees on-site.

Reptiles

*Desk Study*

6.9 Slow worm, grass snake and adder are all known to be present locally.

*Site Assessment*

6.10 The woodland is too shaded and lacking in dense groundflora to be a significant foraging or basking resource; it may however be used for hibernation. The grassland and scrub to the north are more suitable, but very limited in extent. Overall the site offers **low-moderate** potential for reptiles. The habitats would support only common reptiles.

Amphibians

*Desk Study*

6.11 Greated crested newt are recorded in EPSM licences and Survey Licence returns c.2.0 km north, south-east and south. They are likely to be present in the surroundings.

*Site Assessment*

6.12 The woodland contains deadwood and suitable shelter habitats, whilst the scrub and grassland provide some limited foraging habitat. The site is accessible from the nearest waterbody, a ditch to the east, by crossing a made track and going up a c.3.0 m bank into the site. This would be difficult but not impossible. Overall the site offers **low-moderate** potential for amphibians.

6.13 The above ditch was visited on 24th April 2024 and found to be shallow (c.15cm deep) and appeared of relatively poor water quality, lacking aquatic macrophytes. It is considered highly unlikely that great crested newts would use the ditch.

Dormice

*Desk Study*

6.14 Dormice are recorded in one EPSM licence c.2.0 km north, with a single record held by SxBRC. They are likely to be present in the wider surroundings.

*Site Assessment*

6.15 The woodland contains some suitable scrub habitats, such as bramble and blackthorn, but limited connectivity with a high shading canopy. The dominant ash and sycamore would offer only limited foraging potential, and there is limited wider connectivity. Overall the site offers **very low** potential for dormice.

Badger

*Desk Study*

6.16 Badger records are confidential, but they are likely to be present where the levels of the river allow sett-building.

*Site Assessment*

6.17 The site is suitable for badgers being elevated above the floodplain; mammal tracks and a small push-under were found; however nothing which could conclusively confirm badger and no signs of a sett were noted.

6.18 During the update visit, a hole was found in the eastern bank, previously covered by vegetation. The hole was of a size and width indicative of badger, but displayed no evidence of recent use. This is likely to be an annex or outlier sett, that is not in current use but could be re-used in the future. In addition, two possible latrines were observed although clear, fresh droppings were not clearly discernible. Overall the site offers **moderate** potential for badgers.

Other

6.19 No potential for or evidence of any other protected species was recorded. The site is too distant from the river or ditch for water vole to be present. The habitats would support relatively common species of invertebrates only. Hedgehogs may use the site on occasion. No impacts upon other protected species are considered likely and have not been assessed further.

## 7.0 Evaluation of Impacts and Mitigation

Designated Sites

*Potential Impacts*

7.1 The closest statutory designated site is Firle Escarpment SSSI, 950.0 m north-west. The site is within the Impact Risk Zone (IRZ) of the Firle Escarpment and Seaford to Beachy Head SSSIs, but being under 1Ha and under 50 dwellings would not require consultation with Natural England. The site is within the Sussex Chalk Groundwater nitrate Vulnerable Zone, but is not within the nitrate or water neutrality zones. There are no non-statutory sites within 1.0 km. Given the distances to the nearest sites, no significant impacts are predicted.

*Avoidance, Mitigation and Compensation*

7.2 None required.

*Residual Impacts*

7.3 None.

Habitats

*Potential Impacts*

7.4 The proposals would involve removal of low value grassland, scrub and introduced shrubs, and an area of woodland of moderate distinctiveness but poor condition. A Biodiversity Net Gain Assessment has been undertaken of the proposals, which suggests that loss of grassland and scrub habitats can be mitigated and a gain realised on-site, but that woodland habitats would suffer a loss that cannot wholly be mitigated on-site.

7.5 Impacts upon the nearby floodplain or river Priority Habitats are unlikely given the location of the likely access from the west, but should be guarded against.

*Avoidance, Mitigation and Compensation*

7.6 The northern and eastern boundary shall be enhanced with new native mixed hedge, mixed scrub and wildflower grassland. This area shall be separated from gardens with a post-and-rail fence and small access track for management. The southern area of site shall be retained as woodland and this shall be enhanced with new native tree and shrub planting, and addition of woodland wildflowers, bulbs and improved management. The loss of woodland value shall be compensated through purchasing of off-site biodiversity units. Refer to the Biodiversity Net Gain Assessment for more detail.

*Residual Impacts*

7.7 None.

Bats

*Potential Impacts*

7.8 The buildings are classified as offering 'negligible' bat roost potential. Several trees offer 'low' bat roost potential (PRF-Is) and would require removal. It is considered unlikely that works would disturb a bat roost.

7.9 Some loss of foraging habitat would occur as part of the proposals. This would involve the removal of areas of scrub and a number of ash and sycamore trees.

*Avoidance, Mitigation and Compensation*

7.10 Loss of woodland should be compensated for as far as possible through new tree and hedge planting to the boundaries. This should result in an approximately similar commuting resource, and a smaller but better-quality foraging resource.

7.11 Works must be designed to minimise disturbance of any bats which might use the surroundings. Any new lighting must be the minimum necessary, angled downwards and shall avoid any lightspill onto surrounding habitats, and shall accord with the principles of the BCT/ILP Guidance Note 08/23. No construction phase external lighting should be used.

7.12 The loss of minor bat roost potential shall be compensated following the roost-resource approach, with new bat boxes in retained trees.

*Residual Impacts*

7.13 None.

Nesting Birds

*Potential Impacts*

7.14 It is likely that removal of vegetation during the nesting season might disturb nesting birds. There would be an overall loss of nesting and foraging potential for birds.

*Avoidance, Mitigation and Compensation*

7.15 Any tree, scrub or shrub removal must be carried out outside of nesting season (*March-August inclusive)* and following a check to ensure no active nests are present.

7.16 Loss of nesting habitats shall be compensated with new tree and hedge planting, particularly with species which provide fruits nuts and seeds such as guelder rose, crab apple, and bird cherry. New bird boxes such as open fronted boxes shall be installed into retained woodland.

*Residual Impacts*

7.17 None.

Reptiles

*Potential Impacts*

7.18 It is likely that removal of grassland and scrub would remove foraging habitat and removal of woodland hibernation habitat. Works may injure or kill low numbers of reptiles. This would constitute an offence.

*Avoidance, Mitigation and Compensation*

7.19 Some reptile habitat would need to be retained and enhanced to avoid the loss of value to reptiles and the need for an off-site translocation.

7.20 A buffer zone for reptiles of at least 2.0 m shall be retained along the northern boundary of site, where the grassland meets shrubs and scrub. This area shall be retained as long grass with scrub and enhanced through in-planting and seeding to create a diverse habitat. The boundary with gardens (post-and-rail fence) shall allow a porous boundary area where garden grass meets the buffer, further providing New hibernaculum and log pile creation shall compensate for loss of woodland hibernation potential.

7.21 Following habitat enhancement, vegetation shall be cleared manually under ecological supervision, moving from south to north to allow reptiles to disperse. Such works should be undertaken during the active season (mid-March to early November) such that reptiles can disperse.

*Residual Impacts*

7.22 Overall, proposals are likely to result in a minimal loss for reptiles.

Amphibians

*Potential Impacts*

7.23 It is likely that removal of grassland and scrub would remove foraging habitat and removal of woodland hibernation habitat. Works may injure or kill low numbers of amphibians. The ditch to the east was re-visited on 24th April 2024 and found to contain only shallow water and no macrophytes. It is considered highly unlikely that GCN would use the pond for breeding and that GCN would use the site. Impacts on GCN are considered highly unlikely.

*Avoidance, Mitigation and Compensation*

7.24 In the highly unlikely situation that they do use the site, the mitigation for reptiles would protect both GCN and widespread amphibians.

*Residual Impacts*

7.25 None.

Dormice

*Potential Impacts*

7.26 It is unlikely that dormice would be present or impacted by proposals.

*Avoidance, Mitigation and Compensation*

7.27 The clearance of the woodland area should be supervised by an ecologist checking for signs of dormice. If dormice or evidence thereof were found, works would have to cease until a licence was obtained.

7.28 New hedge and tree planting should compensate for any minor loss of dormouse habitat and ensure retained (and possibly strengthened) connectivity and foraging habitat.

*Residual Impacts*

7.29 None.

Badger

*Potential Impacts*

7.30 Whilst no direct evidence of badger was noted, it is possible that a small sett exists to the east (which could be re-occupied prior to development), and other small setts may yet be hidden under scrub. Such a sett would be disturbed by the proposals, constituting an offence. In addition, badgers may forage and commute through the site. Much of this value to badgers could be lost through proposals.

*Avoidance, Mitigation and Compensation*

7.31 The clearance of the scrub, shrubs and woodland area should be supervised by an ecologist and preceded by a pre-commencement badger survey, checking for signs of badgers. The disused sett to the east shall be subject to ongoing monitoring, which shall include at least a 21-day period of camera trap monitoring, to end no more than one week prior to commencement on site. If badgers or evidence thereof were found, works would have to cease until a licence was obtained.

7.32 Fencing shall be designed not to close off habitat areas, or to include badger gates to allow badgers through the site east-west.

*Residual Impacts*

7.33 The gardens and dwelling areas would be largely unsuitable for badgers post-development, but the buffer zone and woodland retained would be of higher suitability. Good routes for badgers to commute through the site would remain.

Hedgehog

*Potential Impacts*

7.34 Proposals might injure individual hedgehogs but might also result in new habitat for them. The clearance of the scrub, shrubs and woodland area should be supervised by an ecologist checking for signs of hedgehogs. Log and brash piles must be moved outside of the hibernation period (November-March inclusive). Any pipes or excavations should be fitted with ramps or covers and checked daily for hedgehogs.

*Avoidance, Mitigation and Compensation*

7.35 New hedgehog boxes should be installed to each garden, and any new fencing fitted with hedgehog gaps and signage to prevent their closure.

*Residual Impacts*

7.36 None.

## 8.0 Ecological Enhancements

8.1 In accordance with current South Downs National Park Policy, the proposals should aim to achieve a gain of some form. This would be over and above the Biodiversity Net Gain mandated by the Environment Act (refer to the separate Biodiversity Net Gain Assessment). The most beneficial enhancements would involve the following:

- Installation of new bat roost features to the buildings, such as an integrated or wall mounted bat boxes;
- Installation of bird nesting features to the buildings such as a sparrow terrace ad swift bricks, over and above the mitigation requirement;
- Installation of insect features to the building or gardens, such as an insect boxes or bee bricks;
- Installation of hedgehog boxes to the gardens;
- Surrounding the gardens with new native hedges, and ornamental plants suited for nocturnal pollinators to provide more bat foraging resource.

## 9.0 Conclusions

9.1 Overall, the proposals are considered to represent a 'low' impact upon ecology.

9.2 No significant effects are anticipated upon any designated site, provided basic avoidance measures are built into the proposals. Potential for impacts to protected and notable species exist but impacts can be avoided through careful construction and mitigation works.

9.3 A Biodiversity Net Gain Assessment accompanies the application detailing how the proposals intend to seek a gain through a combination of on-site and off-site enhancements.

9.4 When mitigation and enhancements have been taken into account, the proposals are not considered to have a negative impact upon habitats or protected species in accordance with planning policy. The proposals would therefore accord with the relevant local and national planning policies and the relevant legislation.

## 10.0 References

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**Table 2 – Species Lists**

**Modified Grassland (Meadow)**

| Common Name | Scientific Name | DAFOR |
|---|---|---|
| Birdsfoot Trefoil | *Lotus corniculatus* | R |
| Bristly Oxtongue | *Helminthotheca echioides* | O |
| Cocksfoot | *Dactylis glomerata* | F |
| Creeping Bent | *Agrostis stolonifera* | O |
| Dandelion | *Taraxacum officinale agg.* | O |
| False Oat | *Arrhenatherum elatius* | A |
| Ivy | *Hedera helix* | LA |
| Marjoram | *Origanum vulgare* | O |
| Mugwort | *Artemesia vulgaris* | O |
| Nettle | *Urtica dioica* | LD |
| Perennial Rye-grass | *Lolium perenne* | A |
| Prickly Sow-thistle | *Sonchus asper* | O |
| Ribwort Plantain | *Plantago lanceolata* | F |
| Tall Fescue | *Schedonorus arundinaceus* | O |
| Yarrow | *Achillea millefolium* | O |

**Woodland**

| Common Name | Scientific Name | DAFOR |
|---|---|---|
| Ash | *Fraxinus excelsior* | LD |
| Blackthorn | *Prunus spinosa* | F |
| Bramble | *Rubus fruticosus agg.* | LD |
| Common Hogweed | *Heracleum sphondylium* | O |
| Common Walnut | *Juglans regia* | R |
| Damson | *Prunus domestica ssp. Institia* | LF |
| Elder | *Sambucus nigra* | O |
| Elm | *Ulmus minor* | O |
| Field Maple | *Acer campestre* | O |
| Ground Elder | *Aegopodium podagraria* | D |
| Hawthorn | *Crataegus monogyna* | A |
| Ivy | *Hedera helix* | LD |
| Lords and Ladies | *Arum maculatum* | O |
| Nettle | *Urtica dioica* | LA |
| Rosebay Willowherb | *Chamaenerion angustifolium* | R |
| Stinking Iris | *Iris foetidissima* | F |
| Sycamore | *Acer pseudoplatanus* | A |

**Introduced Shrubs**

| Common Name | Scientific Name | DAFOR |
|---|---|---|
| Cyclamen | *Cyclamen sp.* | O |
| Firethorn | *Pyracantha sp.* | LF |
| Hibiscus | *Hibiscus sp.* | R |
| Shrub Honeysuckle | *Lonicera nitida* | LF |
| Snowberry | *Symphoricarpos albus* | LF |
| Spiraea | *Spiraea sp.* | O |
| Sweet Box | *Sarcococca sp.* | O |

**Scattered Trees**

| Common Name | Scientific Name | DAFOR |
|---|---|---|
| Ash | *Fraxinus excelsior* | LD |
| Sycamore | *Acer pseudoplatanus* | A |
| Apple | *Malus domestica* | O |
| Holly | *Ilex aquifolium* | R |
| Lawsons Cypress | *Chamaecyparis lawsoniana* | R |

## 11.0 Appendix A - Site Photos

Photo 1 – View of the garage B1.

Photo 2 – View of the shed B2.

Photo 3 – View of the greenhouse B3.

Photo 4 – View of the scrub and nettle groundcover.

Photo 5 – View of the woodland scrub.

Photo 6 – View of the self-set sycamores and ash.

Photo 7 – Overgrown grassland garden with scattered scrub, trees and shrubs.

Photo 8 – Dense area of nettles to north-east.

Photo 9 – Update photo in April, before tree canopies and other vegetation cause more significant shading. The fence between the grassland and woodland was removed between visits as were nettles and scrub.

Photo 10 – Potential badger sett with no significant signs of current use.

Photo 11 – Possible badger latrine.

Photo 12 – Off-site ditch, now considered largely unsuitable for GCN.

## 12.0 Appendix B – Sussex Biodiversity Records Centre Summary Report

Sussex Biodiversity Record Centre

### Ecological Data Search SxBRC/24/077 - Summary Report

**An ecological data search was carried out for Land north of Bank House Farm, Alfriston on behalf of George Sayer (South Downs Ecology) on 29/04/2024.**

**The following datasets were consulted for this report:**

| | Requested | Radius/buffer size |
|---|---|---|
| Designated sites, habitats & ownership maps | No | |
| Protected, designated and invasive species | Yes | 2km |

**Summary of results**

**Sites and habitats**

| | | |
|---|---|---|
| Statutory sites | Not requested | |
| Non-statutory sites | Not requested | |
| Section 41 habitats | Not requested | |
| Ancient and/or ghyll woodland | Not requested | |

**Protected and designated species**

| | | |
|---|---|---|
| International designations | 54 species | 471 records |
| National designations | 159 species | 4,887 records |
| Other designations | 424 species | 8,247 records |
| **Total** | **450 species** | **8,684 records** |
| Invasive non-native | 34 species | 272 records |

The report is compiled using data held by Sussex Biodiversity Record Centre (SxBRC) at the time of the request. SxBRC does not hold comprehensive species data for all areas. Even where data are held, a lack of records for a species in a defined geographical area does not necessarily mean that the species does not occur there – the area may simply not have been surveyed.

**This summary page may be published.**
**The full report and maps may not be published or otherwise shared.**

**The data search report is valid until 29/04/2025 for the site named above.**

**13.0 Figure No. 01 – Site Aerial**

## 14.0 Figure No. 02 – Site Habitat Plan