



Date: 14 November 2025

Our ref: 06908

Andrew Clarke
Mid Sussex District Council
Oaklands Road
Haywards Heath
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By email only: Planning Department, planninginfo@midsussex.gov.uk

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Sussex District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DM/25/1556
Location: Bucklands Farm Brantridge Lane Balcombe Haywards Heath
Proposal: Retrospective planning application for x2 glamping pods for overnight guest use, associated decking, pergolas, footpaths, solar panels, updates to existing permeable track and parking and turning area by each pod.

Thank you for re-consulting Place Services on the above application.

No ecological objection	☐
Recommend approval subject to attached conditions	☐
Further information required	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐

Summary

We have reviewed the documents supplied by the applicant, relating to the likely impacts of development upon irreplaceable habitat. This includes the following documents:

- The Supporting Statement (David Archer Associates Ltd, August 2025)

- The Ancient Woodland Exceptional Circumstances Statement (Batcheller Monkhouse Ltd, August 2025)
- The Tree Assessment, Locations and Schedule (GHA Trees Ltd, October 2023)
- The Proposed Lighting Plan (Glampitect Ltd, October 2024)
- The Lighting Strategy (Glampitect Ltd)
- Drainage information

We note that the proposal involves a retrospective application for two glamping pods and associated infrastructure within Birchett's Wood. This area has been designated as an Ancient Semi Natural Woodland on Natural England's Ancient Woodland Inventory, which can be accessed on [Magic Map](#), but does not contain a further classification as a statutory or non-statutory designated site. The site also located to Bittham's Wood, which is classified as a 'Plantations on Ancient Woodland Sites' (PAWS).

As a result, both woodlands are classified as irreplaceable habitat as defined under [the Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#). The description of ancient woodland is as follows:

"Ancient woodland is areas of woodland that have been continuously wooded since at least 1600. Ancient woodland includes—

- (i) Ancient Semi-Natural Woodlands*
- (ii) Plantations on Ancient Woodland Sites*
- (iii) Ancient Wood Pasture and Parkland*
- (iii) Infilled Ancient Wood Pasture and Parkland"*

Government standing advice¹ on ancient woodlands states that it is a valuable natural asset important for:

- wildlife (which include rare and threatened species) - there is also standing advice for protected species
- soils
- carbon capture and storage
- contributing to the seed bank and genetic diversity
- recreation, health and wellbeing
- cultural, historical and landscape value

Therefore, adverse effects upon ancient woodland are not limited to impacts upon trees, but also native shrubs, undisturbed soil, ground flora and fungi, which provide ecological, cultural, historical and landscape value.

As a result, Local Planning Authorities must take account paragraph 193c of the NPPF when consider impacts to irreplaceable habitat. This states the following:

"When determining planning applications, local planning authorities should apply the following principles:- 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 reasons⁷⁰ and a suitable compensation strategy exists;"

¹ <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>

Footnote 70 defines wholly exceptional reasons as the follows: *“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.”*

As a result, on review of the proposals, it is considered likely that the development proposals have resulted in minor loss or deterioration of ancient woodland via some direct habitat lost, as well as further indirect impacts.

In line with Government standing advice on ancient woodlands, Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by:

- damaging or destroying all or part of them (including their soils, ground flora or fungi)
- damaging roots and understorey (all the vegetation under the taller trees)
- damaging or compacting soil
- damaging functional habitat connections, such as open habitats between the trees in wood pasture and parkland
- increasing levels of air and light pollution, noise and vibration
- changing the water table or drainage
- damaging archaeological features or heritage assets
- changing the woodland ecosystem by removing the woodland edge or thinning trees
 - causing greater wind damage and soil loss

Whereas, Indirect effects of development can also cause the loss or deterioration of ancient woodland, ancient and veteran trees by:

- breaking up or destroying working connections between woodlands, or ancient trees or veteran trees - affecting protected species, such as bats or wood-decay insects
- reducing the amount of semi-natural habitats next to ancient woodland that provide important dispersal and feeding habitat for woodland species
- reducing the resilience of the woodland or trees and making them more vulnerable to change
- increasing the amount of dust, light, water, air and soil pollution
- increasing disturbance to wildlife, such as noise from additional people and traffic
- increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas
- increasing damaging activities like fly-tipping and the impact of domestic pets
- increasing the risk of damage to people and property by falling branches or trees requiring tree management that could cause habitat deterioration
- changing the landscape character of the area

On review of the Supporting Statement (David Archer Associates Ltd, August 2025), we are not satisfied that an appropriate assessment of impacts upon irreplaceable habitat has been provided. The summary statement makes no mention of indirect impacts. In addition, it provides significant focus that the damage already caused by forestry operations far outweighs the impacts of the development. However, these impacts cannot be considered as part of this application, as the forestry management are not related to the proposals.

On review of the Ancient Woodland Exceptional Circumstances Statement (Batcheller Monkhouse Ltd, August 2025), which sets out the public benefit of the development via the following justification:

- Financial Risk and Instability
- Changes to Market Demand
- Climate Adaptation
- Policy and Regulatory Alignment

As a result, we are not satisfied that this provides an adequate case to justify that the public benefit of the development outweighs the impacts of development within irreplaceable habitat and that the development is in line with the principles of paragraph 193c of the NPPF, which relates to large infrastructure development. However, it is up to the Local Planning Authority to ultimately judge the developments level of harm upon the ancient woodland and its character, to determine whether the impacts of the proposal can be considered acceptable in the planning balance.

As a result, if the Local Planning Authority is minded to grant the retrospective development, we recommend that the following must be provided prior to determination:

- Further considerations of the impacts upon protected and Priority species, associated with the ancient woodland, with considerations of the potential impacts during the construction phase, as well as the operation phase of the development.
- Further consideration of the in-direct impacts from the proposals upon the ancient woodland.
- A Woodland Management and Monitoring Plan. This should set out compensation strategy to partially compensate for loss or damage. This could include the following measures in line with Government standing advice on ancient woodlands:
 - create new native woodland or wood pasture and allow for natural regeneration
 - improve the condition of the woodland
 - remove invasive species
 - restore or manage other ancient woodland, including plantations on ancient woodland sites, wood pasture and parkland
 - connect woodland and ancient and veteran trees separated by development with green bridges, tunnels or hedgerows
 - Deer control measures

This is necessary to allow the LPA to demonstrate its statutory duties, as well as its biodiversity duty under NERC Act 2006 (as amended).

Please do not hesitate to contact us if you have any queries in relation to this advice.

Yours sincerely,

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Place Services provide ecological advice on behalf of Mid Sussex District Council.

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

