



PRELIMINARY ECOLOGICAL APPRAISAL

**St. Augustine's C of E Primary School,
Haywards Heath**

On behalf of: AtkinsRéalis

Client:	AtkinsRéalis			
Project:	St. Augustine's C of E Primary School, Haywards Heath			
Reference:	LLD3470-ECO-REP-001-00-PEA			
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Validity:

This report is valid for 18 months from the date of the site visit. If works have not commenced by this date, an updated site visit should be carried out by a suitably qualified ecologist to assess any changes in the habitats present on site, and to inform a review of the conclusions and recommendations made.



LIZARD

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Contents

	Page No.
SUMMARY	01
1.0 Introduction	02
2.0 Scope of Survey	03
3.0 Methodology	04
4.0 Results	11
5.0 Evaluation and Recommendations	24
6.0 Opportunities for Ecological Enhancement	28
7.0 Conclusions	29
8.0 References	30

FIGURES

Figure No. 01 – Site Habitat Plan

APPENDICES

Appendix A – Planning Policy and Legislation



SUMMARY

Lizard Landscape Design and Ecology (LLDE) has been commissioned by AtkinsRéalis to undertake a Preliminary Ecological Appraisal (PEA) of St. Augustine's C of E Primary School, Haywards Heath (located around central grid reference: TQ 36812 23404 – hereafter referred to as 'the site'). This report presents the results of an initial scoping survey which was undertaken on the 27th of February 2025 to evaluate the existing ecological resources within and adjacent to the site, to highlight any potential ecological constraints and opportunities to inform scheme design, and to identify the need for further assessment prior to application, where required.

The site consisted of the school buildings (B01, B02, B03) and the surrounding grounds consisting of areas of hardstanding, vegetated garden and woodland parcels. A pond (P1) also exists on-site. The development is exempt from BNG as proposals fall under the de minimis exemption, due to the proposed extension being located on hardstanding, and as such no more than 25m² of habitat is to be affected. No habitat, linear or spatial, of ecological value greater than 0 is to be directly impacted by the development.

The site provided suitable habitat for nesting birds, amphibians, reptiles, bats, and small mammals. Recommended further Phase 2 survey work and / or avoidance measures are outlined in the table below.

Table No. 01 - Summary of Recommendations

Ecological Receptor	Recommendations	Time Constraint
Bats	1no. further bat emergence survey is to be carried out on B01 and B02 to confirm likely absence or presence of a roost.	May - August
GCN	An eDNA survey should be completed on the pond on site and those within 250m of the site.	15 th April – 30 th June
Birds	Works should avoid the nesting bird season to minimise impacts on any species utilising the adjacent habitats. RAMs have been outlined herein.	Avoid March – August (inclusive)
Small mammals	RAMs have been outlined herein.	N/A
Reptiles	RAMs have been outlined herein.	N/A

1.0 INTRODUCTION

- 1.1 Lizard Landscape Design and Ecology (LLDE) has been commissioned by AtkinsRéalis to undertake a Preliminary Ecological Appraisal (PEA) of land at St. Augustine's C of E Primary School, Haywards Heath (located around central grid reference: TQ 36812 23404 – hereafter referred to as 'the site').
- 1.2 The purpose of this report is to establish the site's suitability for development, inform the design process for future proposals, record the ecological baseline and identify key potential ecological constraints and opportunities associated with future development proposals. This report has been prepared with due consideration for existing best practice guidance (CIEEM, 2017; BSI, 2013) and aims to provide general advice on ecological constraints associated with development of the site. The report includes recommendations for further assessment where necessary. It is not intended that this report should be submitted with a planning application for development of the site, unless supported by the results of further surveys and a detailed assessment of the effects of the proposed development.

Site Information

- 1.3 The site covers an area of c. 0.4ha and consists of a square shaped plot utilised as a school, with hardstanding, buildings, areas of woodland, vegetated garden and a pond.

Surrounding Landscape

- 1.4 The site is located within a suburban setting, within Scaynes Hill. The site is surrounded by woodland to the north, a recreational ground to the east and south and residential buildings to the east. Arable farmland extends into the wider environment in the east, west, and south.

Development Proposals

- 1.5 It is understood that the proposals are for the demolition of the Portakabin building on-site and the partial demolition and extension of the main building on-site. All existing habitats are to be retained.

2.0 SCOPE OF THE ASSESSMENT

2.1 In accordance with current guidance (CIEEM, 2017), the aim of the Preliminary Ecological Appraisal has been to:

- Identify the likely ecological constraints associated with a project;
- Identify any mitigation measures likely to be required, following the 'Mitigation Hierarchy' (BSI, 2013);
- Identify any additional surveys that may be required to inform an Ecological Impact Assessment (EclA); and
- Identify the opportunities offered by a project to deliver ecological enhancement.

3.0 METHODOLOGY

3.1 Desk Study

3.1.1 The Multi-Agency Geographical Information Centre (MAGIC) website was consulted for information regarding the location of waterbodies, priority habitats, statutory designated sites and existing wildlife mitigation licences, within a potential zone of influence of the site. Additionally, the Local Planning Authority (LPA) website was consulted for information regarding the location of non-statutory designated areas, and satellite imagery and historic mapping was used to inform an assessment of the recent land use changes and habitat types within the area. The following potential zones of Influence's have been used for the following potential ecological receptors during the desk study assessment:

Table No. 02 – Zones of Influences for Ecological Receptors

Potential Zone of Influence	Type of Record / Designation/s / Ecological Receptor
0.5km	• Ponds, ditches and other water bodies.
2.0km	• Priority Habitats (UKBAP) (NERC, 2006); • European Protected Species Mitigation Licences (EPSMLs); • Local Nature Reserves (LNRs); • National Nature Reserves; • Sites of Special Scientific Interest (SSSIs); and • Local Wildlife Sites (LWS) / Site of Nature Conservation Interest (SNCI).
10.0km	• Special Protection Areas (SPAs); • potential Special Protection Areas (pSPAs); • Ramsars (Wetlands of International Importance); • proposed Ramsars (pRamsar); • Special Areas of Conservation (SACs); and • possible Special Areas of Conservation (pSACs).
12.0km	• Special Areas of Conservation (SACs) and possible Special Areas of Conservation (pSACs) designated for supporting Annex II bat species.

- 3.1.2 Given the quantum of development proposed / broad low ecological value of the site and the surrounding area, a local biological records centre search has not been provided. This is an approach in line with current guidance (CIEEM, 2020).
- 3.1.3 The Local Planning Authority website was consulted to inform of additional relevant information to this assessment, including local development plan policies in relation to ecology and biodiversity (see *Appendix A – Planning Policy and Legislation*) as well as any Local Nature Recovery Strategies, Nature Improvement Areas (NIAs) and Biodiversity Opportunity Areas (BOAs) etc.

3.2 Field Survey

- 3.2.1 The field survey was undertaken on the 27th of February 2025 by a Suitably Qualified Ecologist (Fleur Booth (MSc, BSc (Hons)), 3 years professional experience). Weather conditions were cold (c.6°C), with minimal wind (Beaufort Scale 1-2), 20% cloud cover, bright sunshine and no rain.
- 3.2.2 The field survey comprised a walkover inspection of the site, immediately adjacent land and boundary features, in which ecological features were noted and mapped in accordance with principles of the UKHabs-Professional Classification System (UKHabs Ltd., 2023). A minimum mapping unit of 25m² / 5m length was used and habitats were identified to at least level 4 wherever practicable. Habitat categories were slightly amended to be consistent with those used as part of Biodiversity Net Gain calculations.
- 3.2.3 A list of plant species noted was compiled, together with an estimate of relative abundance made according to the DAFOR scale. In addition, Target Notes were used to provide supplementary information where necessary on any features encountered which were notable, relevant to the assessment or too small to map.

3.3 Evaluation of Ecological Features

- 3.3.1 An assessment was made to determine the likely importance of any flora / habitats present, as well as determining whether any qualified as being of conservation merit, such as those listed as habitats and species of principal importance for the conservation of biodiversity (NERC, 2006). Likely importance was determined in reference to a predefined geographical frame of reference, as laid out in *Guidelines for Ecological Impact Assessment* (CIEEM, 2022), this was assessed in accordance with the criteria outlined below:

Table No. 03 – Likely Importance Assessment Criteria

Likely Importance Categories	Likely Importance Criteria
Negligible	Of no notable ecological value.
Site	Ecologically valuable within the context of the site
Local	Ecologically valuable within the context of the immediate surrounds, i.e., c. 1km ²
District	Ecologically valuable within the context of the wider surrounds / LPA district, i.e., c. 10km ²
County	Ecologically valuable within the context of the wider county, i.e., c. 100km ²
Regional	Of ecological value within the region, i.e., south east, south west, midlands etc.
National	Of ecological value within the context of the United Kingdom, such as a SSSIs, NNR's etc.
International	Ecological value of global significance, such as SACs, SPAs etc.

- 3.3.2 Habitats within and adjacent to the site were assessed to determine their potential to support protected and notable fauna. This assessment was based on professional judgment and experience, with due consideration to industry standard best practice guidance for the relevant taxa, as laid out in the table below. The possible presence of each taxon was summarised as either negligible, low, moderate, high or confirmed.

Table No. 04 – Habitat Suitability Assessment References

Fauna	Relevant Best Practice Guidance
Great Crested Newts	<i>Great Crested Newt Conservation Handbook</i> (Langton <i>et al</i> , 2001) & <i>Evaluating the Suitability of Habitat for the Great Crested Newt</i> (Oldham <i>et al</i> , 2000)
Reptiles	<i>Herpetofauna Workers' Manual</i> (Gent and Gibson, 2003)
Bats	<i>Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)</i> (Collins, 2023)
Dormice	<i>The Dormice Conservation Handbook</i> (English Nature, 2006)
Water Vole	<i>The Water Vole Mitigation Handbook</i> (Dean <i>et al</i> , 2016)
Birds	<i>Guidance for Bird Surveys in Relation to Development</i> (NE, 2022)
Invertebrates	<i>Considering Terrestrial Invertebrates in Preliminary Ecological Appraisals</i> (Jukes, 2021) and <i>Organising Surveys to Determine Site Quality for Invertebrates</i> (English Nature, 2005)

- 3.3.3 Photographs were taken as evidence and to illustrate any notable ecological features on site. These have been provided within the body of the relevant parts of the Results section, where appropriate.

3.4 Daytime Bat Walkover Survey

- 3.4.1 A Daytime Bat Walkover (DBW) survey was undertaken as part of the field survey assessment by the suitably experienced surveyor (Fleur Booth Accredited Agent under 2016-20460-CLS-CLS).
- 3.4.2 The Daytime Bat Walkover (DBW) survey entailed a slow walkover of the site, during which time the surveyor identified any structures, trees and other features that could be suitable for bats to roost in, and any habitats which could be suitable for bats to commute, forage or swarm in.

- 3.4.3 During this survey any direct evidence of bats was searched for and recorded, such as grease marks, urine stains, bat droppings, feeding remains and dead / live bats. Furthermore, any structures or trees which offered features with the potential to support bats were noted. For trees this included the identification of features typically associated with decay, such as, but not limited to, cracks, crevices and holes naturally formed by trees. For structures this included the identification of features such as, but not limited to, slipped, missing or uneven tiles, gaps around the soffit / barge board and raised flashing etc.
- 3.4.4 All suitable bat habitat was assessed in accordance best practice criteria (Collins, 2023), which is outlined herein. During the survey all trees within and immediately adjacent to the site were assessed using the following criteria:

Table No. 05 – Criteria for Assessing the Bat Roosting Suitability of Trees

Suitability	Description
None	Either no potential roosting features in the tree, or highly unlikely to be any.
FAR	Further assessment required to establish if potential roosting features are present in the tree.
PRF	A tree with at least one potential roosting feature present.

- 3.4.5 If it was possible to adequately assess a Potential Roosting Feature (PRF) from ground level then this was completed, and the feature classified as either:
- **PRF-I:** Feature only suitable for individual or very small numbers of bats, either due to size or lack of suitable surrounding habitat; or
 - **PRF-M:** PRF is suitable for multiple bats and therefore has the potential to be used by a maternity colony.
- 3.4.6 Furthermore, all structures were assessed externally, and internally wherever possible for their potential to support bats, using the following criteria:

Table No. 06 – Criteria for Assessing the Bat Roosting Suitability of Structures

Potential Suitability	Description
None	No habitat features on site likely to be used by any roosting bats at any time of year.
Negligible	No obvious habitat features on site likely to be used by roosting bats. However, some small uncertainty remains, as bats can use small and apparently unsuitable features occasionally.

Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. However, these do not provide enough shelter, space, protection, appropriate conditions or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats.
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, irrespective of species conservation status.
High	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, with the potential to support high conservation status roosts irrespective of species conservation status.
Confirmed	Direct evidence of bats identified.

- 3.4.7 Finally, an assessment of the winter hibernation potential of the structures was made in consideration of the criteria used for assessing structures and trees, in combination with the potential presence of classic hibernation features, known roosts and suitability of habitat in the surrounds.

3.5 Great Crested Newts – Habitat Suitability Assessment

- 3.5.1 Any ponds identified within or adjacent to the site were subject to a Habitat Suitability Index (HSI) assessment to determine their suitability to support GCN, in line with current guidance (Oldham *et al*, 2000), where accessible. The HSI is a numerical index, between 0 and 1 (0 representing completely unsuitable habitat and 1 representing optimal habitat), calculated based on the suitability of 10 calculable indices.
- 3.5.2 HSI assessment is useful to aid in determining how suitable a given waterbody is for GCN, but it does not directly correlate with GCN presence or population numbers and serves as information only.

- 3.5.3 The 10 indices considered as part of the HSI assessment include geographic area, pond area, permanence of waterbody, water quality, shading, waterfowl presence, fish presence, number of ponds within 1.0km, suitability of terrestrial habitat and macrophyte cover, which were investigated during the field survey assessment.

3.6

3.6.1



3.7 Constraints and Limitations

- 3.7.1 Due to the field survey consisting of only one site visit, certain species, particularly some of the flowering plants, may not have been visible or may have been otherwise inconspicuous at the time of the survey and hence overlooked. These are accepted constraints associated with the UKHabs Survey Methodology.
- 3.7.2 It was not possible to conduct an internal roost assessment of B02 and B03 whilst on site. B02 was a locked hut and B03 was in use as a classroom at the time of survey. An external assessment of both was able to be carried out and used to inform a precautionary assessment, whereby the highest roosting value for the building which could reasonably be expected to apply was assumed, to ensure the potential for bats to be present was not undervalued.

4.0 RESULTS

4.1 Desk Study

Pond Study

- 4.1.1 6no. ponds were identified within 500m of the site, based on OS mapping and satellite imagery. Connecting streams running through Collects Wood and Watlands Wood also exist within 500m of the site.

Table No. 07 – Ponds within 500m of the site

Pond No.	Description	Distance and Direction from Site
P1	On-site, small pond within the grounds, directly behind B03.	On-site
P2	Anchor pond, situated within amenity lawns, in a residential area.	270m S
P3	Small pond, situated within a field with scattered trees.	390m S
P4	Pond, situated within Strawberry Wood.	413m SW
P5	Pond situated in Costells Wood.	415m N
P6	Pond situated in Costells Wood.	450m N

Priority Habitats

- 4.1.2 In accordance with the MAGIC dataset, within a 2.0km search radii of the site there were UKBAP Priority Habitats (NERC, 2006) of Lowland Mixed Deciduous Woodland (most of which is Ancient).

European Protected Species Mitigation Licence (EPSML) Search

- 4.1.3 In accordance with the MAGIC dataset, within a 2.0km search radii of the site, the following records for existing European Protected Species Mitigation Licences (EPSMLs) were returned:

Table No. 08 – EPSMLs within Potential Zone of Influence

Date	Species	Licence Permission	Distance and Direction from Site
12/03/2019	Great crested newt	Damage and destruction of a resting site	0.5km S

04/06/2019	Great crested newt	Damage and destruction of a resting site	0.5km S
09/08/2011	Dormouse	Destruction of a breeding and resting habitat	1.9km NW
17/12/2013	Dormouse	Destruction of a breeding and resting habitat	1.9km NW
05/09/2014	Dormouse	Affect, damage and destruction of a breeding and resting habitat	2.0km NW

Local Non-Statutory Designated Areas

- 4.1.4 The following non-statutory designated areas were identified within 2.0km of the site.

Table No. 09 – Non-Statutory Designated Areas

Site	Location
Costells Wood (Local Wildlife Site)	0.2km N

Statutory Designated Sites

- 4.1.5 Statutory designated sites identified within a potential zone of influence of the site include:

Table No. 10 – Statutory Designated Sites

Site	Description	Location
Statutory Designated Sites within 2.0km		
	No statutory sites within 2.0km.	
International Statutory Designated Sites within 10/12km		
Ashdown Forest SAC	The site is designated as it hosts the following habitats listed in Annex I: • European dry heaths • Northern Atlantic wet heaths with <i>Erica tetralix</i>. (Wet heathland with cross-leaved heath) The site is also designated as it hosts the following species listed in Annex II: • Great crested newt <i>Triturus cristatus</i>	8.6km NE

Site	Description	Location
Ashdown Forest SPA	The site is designated as it regularly supports nationally important breeding population of two Annex I species: • Nightjar <i>Caprimulgus europaeus</i> • Dartford warbler <i>Sylvia undata</i> As well as supporting other Annex I species such as woodlark <i>Lullula arborea</i>, hen harrier <i>Circus cyaneus</i> and great grey shrike <i>Lanius excubitor</i>	8.6km NE

- 4.1.6 The site is located within the Impact Risk Zone of Chailey Common SSSI, Scaynes Hill SSSI, Ditchling Common SSSI, Ashdown Forest SSSI. Development proposals however do not meet the criteria which would require the LPA to consult with Natural England regarding potential impacts.

4.2 Existing Habitat Assessment

Site Assessment

- 4.2.1 Habitats within and adjacent to the site include:

- Buildings
- Developed Land; Sealed Surface
- Vegetated Garden
- Modified Grassland
- Individual Trees
- Lowland Mixed Deciduous Woodland
- Native Hedgerow
- Pond

Buildings

- 4.2.2 There are three buildings on-site. B01 is the main school building, made of red brick with plain tile roofing. B02 is a small single-storey prefabricated outbuilding with a metal corrugated roof. B03 is a small Portakabin building, with a flat felt roof.



Image 01: Northwest corner of B03.



Images 02-03: North facing side of B01 (left) and south facing side of B02 (right).

Developed Land; Sealed Surface

- 4.2.3 Areas of hardstanding exist throughout the site, including play areas, paved areas and pavements. These areas are of negligible value.

Vegetated Garden

- 4.2.4 To the northwest of the site, is a small area of vegetated garden with ornamental species and trees. This area is of site value.



Image 04: View of the vegetated garden looking east to west.

Modified Grassland

- 4.2.5 There exists small areas of amenity lawn to the north and west of the site. The sward height was very low c. 2cm, dominated by red fescue *Festuca rubra* and cock's foot *Dactylis glomerata*. Occasional forbs noted included daisy *Bellis perennis* and clover *Trifolium repens*. This homogenous habitat is of site value.



Images 05 and 06: View of the western area of grassland looking north to south (left). View of amenity lawn to the entrance of the site (right).

Individual trees

- 4.2.6 In the area of amenity lawn by the entrance of the site is a single, small ornamental cherry tree *Prunus* sp. Given the small size of the tree, this habitat is limited to site value.

Lowland Mixed Deciduous Woodland

- 4.2.7 To the east and west are small parcels of woodland that dominate the borders of the site. These areas are made of mature trees, mainly of oak *Quercus robur*, beech *Fagus sylvatica*, and cypress *Cupressus* sp. To the west the ground flora is made up of grassland species and to the east there is predominantly bare ground. These habitat parcels are of site / local value.



Images 07 and 08: View of western area of woodland (left), view of eastern area of woodland (right).

Native hedgerow

- 4.2.8 Along the northern and southern boundaries, runs native hedgerow. This linear habitat is made up primarily of hawthorn *Crataegus monogyna*. This hedgerow comprises greater than 80% native species as and such is a priority habitat, however given its fragmented nature its value is limited to the site level.



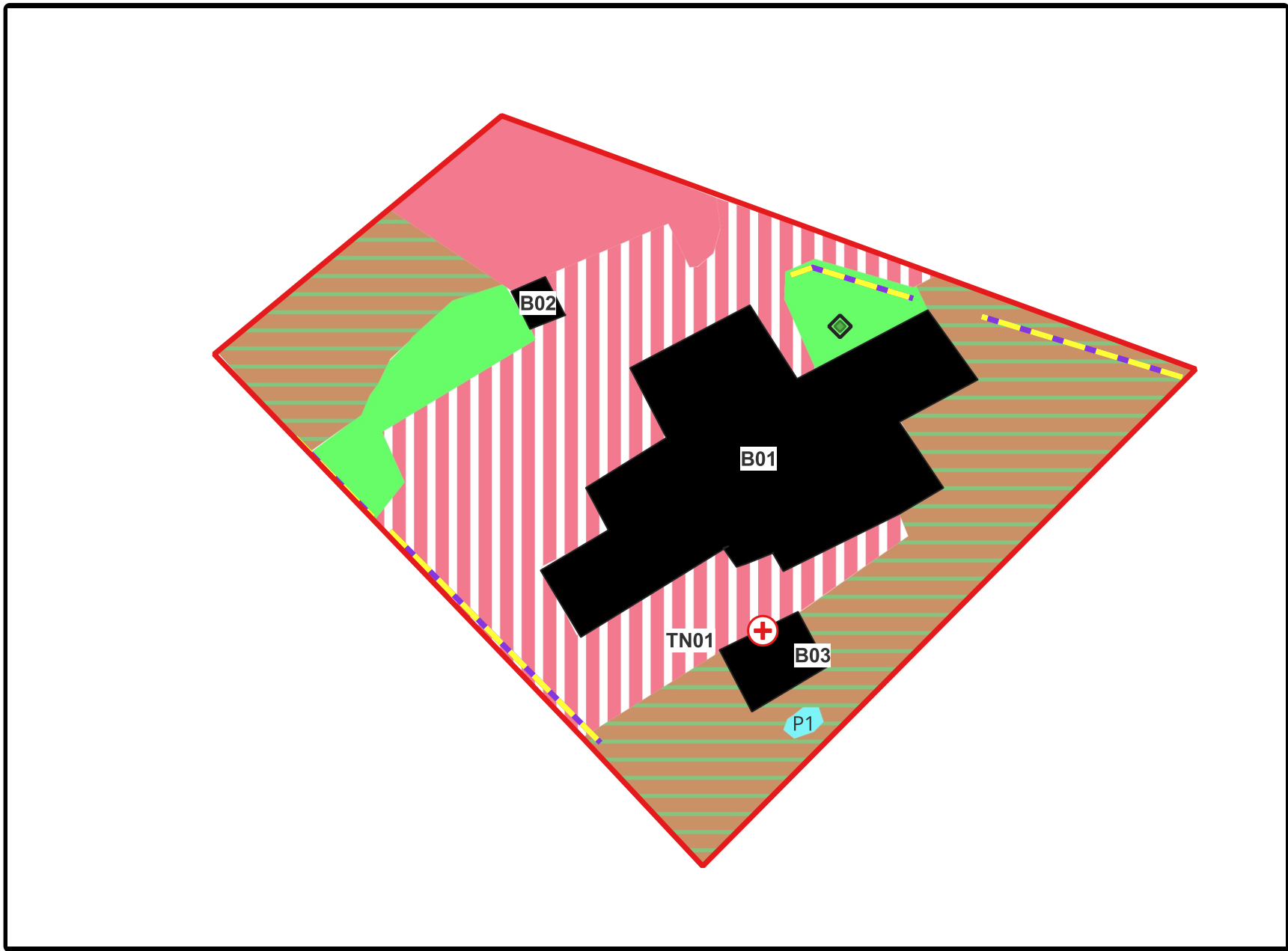
Images 09 and 10: View of northern hedgerow (left) and view of southern hedgerow (right).

Pond

- 4.2.9 To the eastern boundary, and directly adjacent to B03, is a small pond (P1). At the time of survey, it had only corkscrew rush *Juncus Effusus Spiralis* as the sole vegetation. Debris and leaf litter were present throughout the waterbody. This small ornamental pond is of site value.



Image 11: View of P1.



Legend

- Red Line Boundary
- Tree
- Native hedgerow
- Developed land; sealed surface
- Lowland mixed deciduous woodland
- Modified grassland
- Pond
- Vegetated garden
- + Target note
- + Mammal hole
- Buildings

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Project Title & Location
 St Augustine's Church of England Primary School, Haywards Heath

Drawn by	Approved by	Rev	Date
FB	SH	00	04/03/25

Figure No. 01 - Site Habitat Plan

4.3 Invasive Species

- 4.3.1 Cherry laurel *Prunus laurocerasus* was observed on site, planted ornamentally. This species is not listed on Schedule 9 of the Wildlife and Countryside Act 1981, however it is listed as an invasive species within Sussex and its further spread should be controlled.

4.4 Protected and Notable Fauna - Likely Presence Assessment

Amphibians

Desk Study

- 4.4.1 There are known records for great crested newt *Triturus cristatus* from within the search area, including a positive survey license return from May and June 2017 in Anchor Wood, 0.4km south of the site. Records for other amphibians include common toad *bufo bufo*, common frog *Rana temporaria*, as well as smooth and palmate newts *Lissotriton vulgaris* and *helveticus*.

Site Assessment

- 4.4.2 The pond on-site was subject to a HSI and had a score of 'poor'. The site itself is of relatively low suitability due to the site being situated in a fairly urban environment, and in constant use as a school. There are suitable areas of habitat by way of modified grassland and woodland however these areas are not connected to the wider habitat. It is likely therefore that the site is of no more than **low** suitability for GCN and other amphibians.

Table No. 11 – Summary of HSI Result for P1

HSI Criteria	P1	
Location	1	Zone A
Pond Area	0.01	10m ²
Permanence	1.0	Rarely dries
Water Quality	0.33	Poor
Shade	0.8	70% cover
Waterfowl	1	Minor
Fish	1	Absent
Pond Count	1	11 per km ²
Terrestrial Habitat	0.33	Poor
Macrophytes	0.6	30% cover
HSI Score	0.47	Poor

Reptiles

Desk Study

- 4.4.3 Records for common and widespread reptiles such as slow worm *Anguis fragilis*, common lizard *Zootoca vivipara* and grass snake *Native helvetica*, have been noted from within the search area.

Site Assessment

- 4.4.4 Reptiles require a mosaic of habitats to persist in a landscape, including vegetative cover for refuge opportunities, open areas for basking and a diverse flora to support viable invertebrate prey throughout the year. Small areas of habitats which provide these opportunities are present on-site, however they are small in extent. Furthermore, as the site is in constant use and not functionally connected to more suitable areas in the wider environment it likely of no more than **low** suitability for reptile species.

Bats

Desk Study

- 4.4.5 Records for common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared *Plecotus auritus* and alcahloe *Myotis alcathoe* bats, were all returned form within the search area.

Preliminary Roost Assessment - Trees

- 4.4.6 No trees on-site were observed to have PRFs, and none are to be impacted by the development.
- 4.4.7 All buildings within the site were assessed externally for bats. A summary of this assessment is provided in the table below. Building reference numbers are illustrated on *Figure No. 01 – Site Habitats Plan*.

Table No. 12 – Preliminary Bat Roost Assessment Results - Buildings

Building Ref	External assessment	Internal assessment	Overall result
B1	Medium sized, two storey building made of red brick, the roof formed of interlocking concrete tiles in good condition. Small areas of metal flashing had gaps beneath, providing roosting opportunities for crevice dwelling species.	The internal roof space of the northern portion of the building was closed off and not possible to access. The southern section of the building to be demolished had a wooden timber frame and felt roof lining in good condition with no obvious tears. There were circular openings allowing a lot of light through, although not possible to determine if fully covered, these may allow ingress into the building. No evidence of roosting bats was identified. The building is actively used as a school, likely to deter bat use.	Low
B02	Small garage with a corrugated metal roof. No ingress opportunities noted, nor were there any cavities in any aspects of the building.	Not possible at time of survey.	Negligible
B03	A one-storey portakabin style building, with a flat felt roof. There was a small ridge around the roof which may provide roosting opportunities. This building was connected to B01 by a plexiglass and timber frame veranda.	Not possible at time of survey.	Low



Images 12 - 15: Internal view of roof void of B01, with circular tiles allowing potential ingress into building (top left). Damaged fascia to southeastern aspect (top right). View of gap between wall and metal edge strip (bottom left). View of cavity within fascias of B01.



Image 16: View of B03, showing the felt roof lip surrounding the roof, providing roosting opportunities.

Winter Roosting Potential

- 4.4.8 Given the results of the preliminary roost assessment and in consideration of the presence of non-classic hibernation features, the suitability of the surrounding habitat for commuting and foraging, and the presence / absence of known roosts, it was determined that the site offered **low** winter roosting potential.

Foraging and Commuting Suitability

- 4.4.9 The site is dominated buildings and hardstanding which provide no commuting or foraging opportunities. The boundary hedge and woodland are mature although are not well connected to suitable habitat within the wider landscape. The habitats overall are considered to be of **low** habitat suitability.

*Dormice**Desk Study*

- 4.4.10 Multiple records for dormice *Muscardinus avellanarius* were returned from within the search area.

Site Assessment

- 4.4.11 Boundary vegetation contains some species suitable to support dormouse foraging, however these boundaries are defunct and are not functionally connected to areas of suitable habitat in the wider environment. The site is therefore of **low** value to this species.



Birds

Desk Study

- 4.4.14 Numerous records for birds were returned from within the search areas. Including records for species of birds listed on the Birds of Conservation Concern (BoCC) Red List (Stanbury *et al*, 2021). This included records for birds greenfinch *Chloris chloris*, as well as ground nesting birds such as meadow pipit *Anthus pratensis* and skylark *Alauda arvensis*. Records for birds of prey, wintering wildfowl, seasonal migrants, farmland species and woodland species were also returned.

Site Assessment

- 4.4.15 The site supports suitable habitat for passerines, such as hedgerows, trees within the woodland as well as other more niche nesting habitats, such as flat roofs, where gulls often nest. The site is unlikely to support ground nesting birds, due to the lack of suitable undisturbed habitat. The site also had multiple bird boxes attached to trees and B01. Therefore, the site will likely provide ample nesting and foraging opportunities for common species. Therefore, this site is of **moderate** potential to support birds.

Invertebrates

Desk Study

- 4.4.16 Many records for invertebrates were returned from within the search area. Notable species records returned were stag beetle *Lucanus cervus*, purple emperor *Apatura iris* and large tortoiseshell butterfly *Nymphalis polychloros*, amongst others.

Site Assessment

- 4.4.17 The site has a diverse range of invertebrates likely of value to support invertebrates, including the pond, bare ground within the woodland, areas of deadwood, and forbs within the grassland. The habitats on-site therefore have a **moderate** value to support invertebrates of a notable assemblage.

Others

- 4.4.18 High numbers of records for widespread mammal species such as rabbit *Oryctolagus cuniculus* and fox *Vulpes vulpes* were returned from within the search area. There was also a large hole (TN01), potentially animal made under B02, on the western aspect, see Image 12 below. It is likely that the site has a **low** potential to support these species, as the site provides suitable habitat for foraging and resting opportunities. No other suitable habitat for more notable mammalian species was observed on-site.



Image 17: View of potential mammal hole TN1, on western aspect of B03.

5.0 ECOLOGICAL CONSTRAINTS AND RECOMMENDATIONS

5.1 Internationally Designated Sites

- 5.1.1 1no. internationally designated statutory site was identified within a potential zone of influence of the proposed development site. Due to the intervening distances, existing habitats on site and small scale of the development, no impacts upon Ashdown Forest SAC and SPA are likely to occur.

5.2 Nationally and Locally Designated Sites

- 5.2.1 Several nationally and locally designated areas were identified within a potential zone of influence of the site. However, none exist within or directly adjacent to the site, so would not be likely to be directly impacted by proposals.

5.3 On Site Habitats

- 5.3.1 The following section provides an evaluation of the potential impacts of proposals on the habitats on site and outlines any recommendations required in order to ensure proposals accord with planning policy and legislation (see *Appendix A*), and to maximise opportunities to deliver net gains for biodiversity. Where identified, any potential impacts should be addressed in line with the mitigation hierarchy (BSI, 2013) (CIEEM, 2022) and where possible, mitigation should be embedded in the scheme design as this gives assurance of delivery.

Biodiversity Net Gain Statement

- 5.3.2 The proposed development does not impact a priority habitat. Nor does it impact more than 25m² of onsite habitat with a value greater than 0, or 5m of linear habitats such as hedgerows. As such, the development is subject to the de minimis exemption and is not required to demonstrate Biodiversity Net Gain.

Evaluation and Recommendations

- 5.3.3 Overall, the habitats on site were assessed as being of broad low ecological value. The existing areas of hardstanding are highly suitable for development, and the loss of which does not need to be compensated for within the scheme.
- 5.3.4 The greatest ecological interest at the site associated with the woodland and mature hedgerow habitats. Proposals should retain and protect these areas wherever practicable through the inclusion of suitable semi-natural buffers within the scheme. It is recommended that an Arboricultural package is produced to ensure the woodland is protected during the demolition of B02 and the partial demolition and construction of the extension to B01, in line with best practice (BSI, 2012).
- 5.3.5 It is recommended that the small areas of cherry laurel on site should be removed by a suitable contractor. All arisings are to be securely bagged and removed from site to an authorised composting location to avoid the spread of this species into the wild.

5.4 Protected and Notable Species

- 5.4.1 Varying levels of legal protection are afforded to certain protected animals, certain species of conservation importance and broader biodiversity (see *Appendix A – Planning Policy and Legislation*). Therefore, in order to ensure proposals accord with statutory legislation further surveys for these taxa may be required to determine their presence and, if present, to devise an appropriate mitigation strategy. Any protected / notable species assessed as having negligible potential to exist on site during the possible presence assessment were scoped out of further assessment at this stage.

Amphibians

- 5.4.2 The protected species assessment identified that the site and adjacent habitats offered low potential to support GCN and the HSI assessment of P1 suggests the water body is of poor suitability. Overall, it is likely that GCN are absent, but it is not possible to completely scope GCN out at this stage, particularly as P1 is so close to B03, which is scheduled for demolition. Therefore, a single GCN eDNA survey on each pond should be completed mid-April to June inclusive, which will likely result in GCN being scoped out of further assessment. However, should GCN eDNA be identified, further GCN population surveys would need to be completed, which would need to be completed between mid-March and June inclusive and in line with current guidance (Langton *et al*, 2001). Therefore, as a precaution, an eDNA survey should be completed ASAP in mid-April, to ensure time is available to complete follow up surveys, should GCN presence be confirmed.

Reptiles

- 5.4.3 The protected species assessment identified that the site and adjacent habitats offered low potential to support reptiles. As reptiles are protected from reckless killing and injury (Wildlife and Countryside Act, 1981), the following reasonable avoidance measures should be carried out:
- The existing vegetation surrounding B03 is to be kept at its current short length prior to construction to ensure it remains unsuitable for amphibians.
 - All suitable reptile habitat is to be retained within the scheme and if in the unlikely event any reptiles are found during construction, these should be relocated to the woodland margins either to the east or west of the site should they be encountered over the course of works.

Bats

- 5.4.4 The protected species assessment identified that B01 and B03 offered low potential to support roosting bats, which was exemplified by the small gaps within the fascia of B01, and small gaps between the wall of the building and the felt roof of B03. A single emergence survey of both buildings should be undertaken to ascertain the likely presence / absence of bats, the species, roost type and location / access points. Surveys should be completed between May – August in suitable weather conditions, and in accordance with best practice (Collins, 2023).

- 5.4.5 The site is unlikely to support a notable assemblage of foraging / commuting bats and therefore, bat activity surveys are not required. However, proposals should be mindful of the potential for bats to occur in the area by ensuring that the woodland and hedgerows on-site are protected from inappropriate nocturnal lighting above existing baseline levels. Any external lighting designs should comply with best practice standards in regard to external lighting and bats (BCT & ILP, 2023).

Dormouse

- 5.4.6 All boundary vegetation / hedgerows should be retained within the scheme. If any woodland or hedgerow is proposed to be removed further surveys may be necessary to determine the presence / absence of this species on site.

Birds

- 5.4.7 The protected species assessment identified that the site and adjacent habitats offered habitats of moderate value to wild birds. However, no habitat suitable to support nesting birds is scheduled for removal. The bird boxes on-site to be impacted by development should be subject to a nesting bird check prior to removal, to be conducted by suitably qualified ecologist or arborist. These should then be moved to the woodland, away from the development zone.

Invertebrates

- 5.4.8 All valuable invertebrate habitat, such as the woodland, pond and hedgerows, are to be retained. The development will likely have no impact on invertebrates; however, provisioning of insect boxes and nectar-rich planting would provide a wildlife benefit.

Other mammals

- 5.4.9 The aforementioned RAMs for reptiles would be suitable to mitigate potential impacts to small animals during the initial construction phase, should they be on site.

6.0 OPPORTUNITIES FOR ECOLOGICAL ENHANCEMENT

6.1 The site is exempt from the requirement to deliver +10% Biodiversity Net Gain outlined by the Environment Act (2021). However, opportunities for ecological enhancements which could be incorporated into the scheme design are provided below:

- The use of log and compost piles to provide refugia for reptiles and amphibians.
- Installation of integrated bird and bat boxes into new buildings.
- Installation of 'bug hotels', bird and bat boxes to mature trees.
- All new planting should ideally be native species. Where this is not possible all ornamental varieties should have a known wildlife value, such as species listed on 'RHS Plants for Pollinators'

7.0 CONCLUSIONS

- 7.1 The site covers an area of 0.4ha and is located within Scayne Hill, to the east of Haywards Heath. The site consists of a school, including buildings, hardstanding, woodland, grassland, hedgerow and a pond. Farmland and residential development lie to the north, south, east and west of site. The greatest ecological interest at the site is associated with woodland and hedgerow on-site which should be retained and protected throughout proposals, wherever practicable.
- 7.2 The habitats within and adjacent to the site were found suitable to support amphibians, dormouse, reptiles, birds, mammals, and roosting bats. Further survey work in the form of an eDNA survey of the pond on-site as well as a single emergence survey of B01 and B03 to determine likely absence or presence of a bat roost is required prior to planning submission. For all other species, RAMs have been outlined herein.
- 7.3 Proposals have negligible potential to impact upon any statutory designations identified within a potential zone of influence of development. Therefore, further assessment in regard to the *Habitat Regulations (2017)* nor site-specific mitigation is not required.
- 7.4 Opportunities for ecological enhancement have been provided to allow the ecological value to the site to be maximised. Based upon the current proposals, the site is exempt from BNG under the de minimis rule.
- 7.5 Subject to a sensitively designed scheme, which gives due consideration to the survey and mitigation requirements outlined herein, no major ecological constraints have been identified which would preclude the provision of a well-designed development.

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Table No. 13 – Species List for Habitat Parcels**Modified Grassland**

Common Name	Scientific Name	DAFOR
Annual Meadowgrass	<i>Poa annua</i>	F
Birdsfoot Trefoil	<i>Lotus corniculatus</i>	R
Bristly Oxtongue	<i>Helminthotheca echioides</i>	O
Broadleaf Plantain	<i>Plantago major</i>	O
Chickweed	<i>Stellaria media</i>	O
Cleavers	<i>Gallium aparine</i>	LF
Clover	<i>Trifolium repens</i>	F
Cocks-foot	<i>Dactylis glomerata</i>	A
Creeping Buttercup	<i>Ranunculus repens</i>	A
Curled Dock	<i>Rumex crispus</i>	F
Daisy	<i>Bellis perennis</i>	D
Dandelion	<i>Taraxacum officinale</i>	O
Moss sp.	<i>Byrophyta sp.</i>	A
Red Fescue	<i>Festuca rubra</i>	D
Thistle	<i>Cirsium sp.</i>	O
Yorkshire Fog	<i>Holcus lanatus</i>	O

Lowland Deciduous Woodland

Common Name	Scientific Name	DAFOR
Beech	<i>Fagus sylvatica</i>	A
Bramble	<i>Rubus fruticosus</i>	O
Cypress	<i>Cypressus sp.</i>	F
Hawthorn	<i>Crataegus monogyna</i>	O
Holly	<i>Ilex aquifolium</i>	F
Lime	<i>Tilia x europaea</i>	A
Oak	<i>Quercus robur</i>	A
Privet	<i>Ligustrum ovalifolium</i>	O
Ground Flora		
Cleavers	<i>Gallium aparine</i>	F
Cow Parsley	<i>Anthriscus sylvestris</i>	LD
Crocus	<i>Crocus sativus</i>	O
Daffodil	<i>Narcissus sp.</i>	LF
Dock	<i>Rumex obtusifolius</i>	O
Herb Robert	<i>Geranium robertianum</i>	LD
Ivy	<i>Hedera helix</i>	D
Lords and Ladies	<i>Arum maculatum</i>	R
Nettle	<i>Urtica dioica</i>	F
Primrose	<i>Primula vulgaris</i>	O
Snowdrop	<i>Galanthus nivalis</i>	O

Native hedgerow

Common Name	Scientific Name	DAFOR
Bramble	<i>Rubus fruticosus</i>	O
Hawthorn	<i>Craetus monogyna</i>	D
Ivy	<i>Hedera helix</i>	O

D – Dominant; A – Abundant; F – Frequent; O – Occasional; R – Rare; L – Locally

Table No. 14 – Target Notes

Ref	Feature	Description
TN01	Mammal hole	Hole on eastern aspect of B03, likely a mammal hole.

Appendix A – Planning Policy and Legislation

Legislation

Legislation relating to wildlife and biodiversity of particular relevance to this report 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;*
- and
- *The Environment Act 2021.*

This above legislation has been addressed, as appropriate, in the production of this report. Further details of legislation relating to the protection of particular ecological receptors are provided in the table below:

Ecological Constraint	Rationale
SACs (Special Area of Conservation), SPAs (Special Protection Areas) and Ramsars (Wetlands of International Importance)	Under the Conservation of Habitats and Species Regulations 2017 places a duty on the competent authority to maintain the favourable conservation status of designated SAC, SPA and Ramsar sites. Therefore, where it appears to the appropriate nature conservation body that a notice of a proposal relates to an operation which is, or forms, part of a plan or project which is likely to have a significant effect on a European site (either alone or in-combination with other plans or projects), and (b) is not directly connected with or necessary to the management of that site, it must make an appropriate assessment of the implications for that site in view of that site's conservation objectives. In the light of the conclusions of the assessment, it may give consent for the operation only after having ascertained that the plan or project will not adversely affect the integrity of the site.
European protected species (bats, otters, dormice, water voles, great crested newts)	It is an offence under the Conservation of Habitats and Species Regulations 2017 to deliberately kill or injure a European protected species, to destroy breeding/resting sites, or to deliberately disturb these species and affect their ability to survive, rear young, breed, or hibernate.
Nationally protected species (bats, water vole, otter)	It is an offence under the Wildlife and Countryside Act 1981 (as amended) to intentionally or recklessly disturb a species listed on Schedule 5 whilst it is in a place of shelter, or to obstruct access to a place for shelter.
Nationally protected species (reptiles)	It is an offence under the Wildlife and Countryside Act 1981 (as amended) to kill or injure common species of reptiles.
National conservation priority species (white-clawed crayfish, fish, common toad, reptiles, noctule, water vole, otter, hedgehog), i.e., UKBAPs	Section 41 of the NERC Act 2006 requires the Secretary of State to publish a list of species and habitats that are of principal importance for the conservation of biodiversity, and to take, and promote others to take, such steps to further the conservation of these habitats and species. These species and habitats will be considered by Planning Authorities in regard to the National Planning Policy Framework (Ministry of Housing, Communities & Local Government, 2021) to conserve and enhance the natural environment.

Ecological Constraint	Rationale
Wild mammals (rabbits, foxes, water vole, otter, hedgehog, [REDACTED])	It is an offence under the Wild Mammals (Protection) Act 1996 to inflict unnecessary suffering to any wild mammal with intent.
Nesting birds	It is an offence under the Wildlife and Countryside Act 1981 (as amended) to damage or destroy a bird's nest whilst it is in use, and to kill or injure a bird or destroy an egg.
Non-statutory designated sites (SNCI's, LWS, LNR's, etc.)	LNRs are designated under Section 21 of the National Parks and Access to the Countryside Act 1949, which was amended by the Natural Environment and Rural Communities Act 2006. The value for biodiversity of LNRs and LWSs are recognised, and the sites and surrounding buffers are protected by the Local Plan.
Biodiversity	Section 40 of the NERC Act 2006 states that each public authority "must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity." This legislation makes it clear that planning authorities should consider impacts to biodiversity when determining planning applications. Chapter 15 of the National Planning Policy Framework (Ministry of Housing, Communities & Local Government, 2021) states that the planning system and policies should minimise impacts on and provide net gains for biodiversity, and that, if significant harm to biodiversity would result from a development, then development should be avoided (through locating on alternative sites with less harmful impacts).
Irreplaceable habitats (ancient woodland, veteran trees, lowland meadows)	Chapter 15 of the National Planning Policy Framework (Ministry of Housing, Communities & Local Government, 2021) states that 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 and a suitable compensation strategy exists.
Biodiversity Net Gain	+10% Biodiversity Net Gain (BNG) for new developments will be mandatory under the Environment Act (2021), although this deadline will be extended to April 2024 for small sites and there are exemptions for development below a 25m ² threshold, and for householder applications and self-builds. BNG means that proposals must result in more and/or better-quality natural habitats than there were before development. This also requires that any proposed habitats within the scheme would be necessary to manage for at least 30 years, which would be sought through the provision of S106 legal agreements or conservation covenants.

Local Planning Policy

The Mid Sussex District Plan 2021 – 2039 (Mid Sussex District Council, 2019) sets out the planning policies for development in the district in relation to biodiversity.

Those of potential relevance to this assessment are highlighted in the table below:

Policy Reference	Policy Text
DPN1: Biodiversity, Geodiversity and Nature Recovery	Biodiversity will be protected and enhanced by ensuring development: • Protects existing biodiversity by retaining features of interest, including connecting routes as part of wider ecological networks, and ensuring the appropriate longterm management of those features; and • Takes appropriate measures to avoid and reduce disturbance to sensitive habitats and species and to support the recovery of Priority species populations; • Contributes and takes opportunities to improve, enhance, manage and restore biodiversity and green and blue infrastructure, so that there is a net gain in biodiversity, including through creating new designated sites and locally relevant habitats to support nature recovery.
DPN2: Biodiversity Net Gain	It is expected that development proposals will enhance existing biodiversity and incorporate features to encourage biodiversity and pollination within and around the development.
DPN4: Trees, Woodland and Hedgerows	The District Council will support the protection and enhancement of trees, woodland and hedgerows, and encourage new planting. Development (including construction and operational activities) that is adjacent to irreplaceable habitats including ancient woodland and ancient or veteran trees must incorporate appropriate buffers and/or root protection areas, that will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/or that have landscape, historic or wildlife importance, will not normally be permitted. The value of trees, woodland and hedgerows individually and cumulatively in providing connectivity and continuity across the landscape and a network for nature recovery will be taken into account so that habitat fragmentation, particularly of large and extensive woodland areas, is minimised.