

Project	Sunte House, Birchen Lane, Haywards Heath, West Sussex	Date	October 2025
Note	Response to Ecology Consultee comments regarding BNG	Ref	UE0664
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1 Introduction

- 1.1 Comments were received from the Ecology Consultee at Mid Sussex District Council associated with the Planning Application DM/25/1708 for the alterations and extension to the residential outbuilding associated with Sunte House (Barn). The comments were in reference to the requirement for a Biodiversity Net Gain (BNG) Assessment. This Technical Note responds to this concern and presents further information to address it.

2 BNG Exemption

- 2.1 Ecologist Consultee comment: *The application form states that the De minimis exemption applies. However, site plans show that at least one tree is proposed for removal. The loss of an individual tree, in combination with the small area proposed for extension works exceeds 25m². As this application is not exempt from BNG, a full BNG metric, baseline habitat map and condition assessments (where relevant) must be provided prior to determination.*
- 2.2 Response: The tree the Ecology Consultee refers to is tree T23 as mapped within the Arboricultural Impact Assessment¹. However, arboricultural and ecological assessments are distinct and do not follow the same methodologies. As such, the UKHab map that was produced as part of the Preliminary Ecological Appraisal did not consider tree T23 to be an individual tree, and instead classified it as part of an area of introduced shrub. T23 was a Portugal laurel *Prunus lusitanica* with a Diameter at Breast Height (DBH) of 190cm and was surrounded by similar planted ornamental shrub species such as viburnum *Viburnum spp.*, butterfly-bush *Buddleja spp.*, box *Buxus spp.*, and skimmia *Skimmia spp.*. This area was considered to be meet the UKHab definition of introduced shrub, as follows: *Non-native tall phanerophytes, mid phanerophytes or low phanerophytes planted in a garden or park setting.*

¹ UEEC (2025): Sunte House, Birchen Lane, Haywards Heath, West Sussex: Arboricultural Impact Assessment

- 2.3 Because T23 is not classified as a tree, the area lost (in BNG terms) is much lower than the Ecology Consultee has suggested. Therefore, the loss of this tree and proposed extension at 12m² are below the *de minimis* threshold for BNG exemption of 25m² in total.