

[REDACTED]
90 Lewes Road
Haywards Heath
RH17 7SX

9 July 2025

Dear Joanne

Re: DM/25/0445 Land at North Colwell Farm

I write in connection with the above planning application. This letter only considers hedgehogs – please refer to my earlier planning submissions regarding other wildlife.

I provide additional evidence that Hedgehogs (*Erinaceus europaeus*) occur on the site, and photographic evidence of a dead Hedgehog on the Lewes Road 80m from the site boundary, and 40m from the proposed access road (see page 3 for photo of dead hedgehog and map).

Please can you pass on this new information to your Ecology Consultee.

Hedgehogs are a material consideration for planning authorities – they are protected by British law under Schedule 6 of the Wildlife and Countryside Act 1981, and under the Wild Mammals Protection Act (1996). They are also listed as a Species of Principle Importance in England under the Natural Environment and Rural Communities (NERC) Act 2006 Section 41. In 2020, hedgehogs were put on the IUCN Red List as vulnerable to extinction in Great Britain.

The harm caused to Hedgehogs, which are considered a priority species, means the site does meet various elements of the National Planning Policy Framework (NPPF) including paragraphs 187d and 192b:

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

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;”

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

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

Millers Homes states in its Ecological Impact Assessment that there are “38 records of Western European hedgehog (*Erinaceus europeaus*) presence within 2km of the site” and states that “the site itself is considered to support high potential for hedgehogs”. (Section 4.9 of the EcIA)

However, its minimal mitigation plan for Hedgehogs only mentions gaps in garden fences to allow for the movement of hedgehogs (Section 6.9.3 of the EcIA). This low/no cost option will have minimal impact on the devastating impact of the development on Hedgehogs.

According to guidance for developers produced by BHPS The Hedgehog Conservation Society and People's Trust for Endangered Species¹, some of the issues which developers should consider are:

- Work likely to cause disturbance during hedgehog hibernation – for example removal of hibernation habitats such as log piles and dense scrub – shouldn't take place during November to March.
- The building site should be made safe for ground-dwelling animals with hazards such as open holes, pits, ditches, ponds and drains covered over or fitted with ramps to allow for escape. Netting should be kept off the ground to avoid entanglement and any slack netting tied up.
- Particularly hazardous areas, such as where there will be high traffic, should be blocked off to prevent hedgehog access, but connectivity should also be ensured throughout the rest of the build to facilitate movement across and surrounding the site.
- Hedges are preferable to fences for defining property boundaries where feasible.
- Retain areas of unkempt leaf litter, dead wood and scrub to provide shelter for hedgehogs. Scrub patches (particularly brambles) that provide suitable hibernation nesting habitat are important for hedgehogs
- Minimise areas of hard standing and artificial grass in favour of grassland or permeable 'living driveways'

In addition, there has been no consideration of the impact of the site roads. According to The State of Britain's Hedgehogs 2022², there are only approximately 879,000 hedgehogs in Britain.

According to recent research by The Mammal Society³, it is estimated that 167,000–335,000 hedgehogs are killed annually on roads. The report states in its conclusion: *“Road mortality may affect hedgehog abundance: Huijser & Bergers (2000) estimate that roads and traffic are likely to reduce hedgehog density by about 30%, sufficient to affect the survival probability of local populations.”*

Millers Homes proposes a number of roads, including a site access road and various roads within the site. It is likely that the number of hedgehog casualties will greatly increase with the proposed development. They have not considered any options to reduce the likelihood of collisions, such as creating wildlife crossings.

I note that there was no mention of hedgehogs in any of the report's produced by the Council's Ecology Consultee.

Thank you for your time in considering this submission.

Yours faithfully

¹ Hedgehogs and development

BHPS The Hedgehog Conservation Society

People's Trust for Endangered Species

<https://www.britishhedgehogs.org.uk/leaflets/Developers-Leaflet.pdf>

² The State of Britain's Hedgehogs 2022

British Hedgehog Preservation Society & People's Trust for Endangered Species

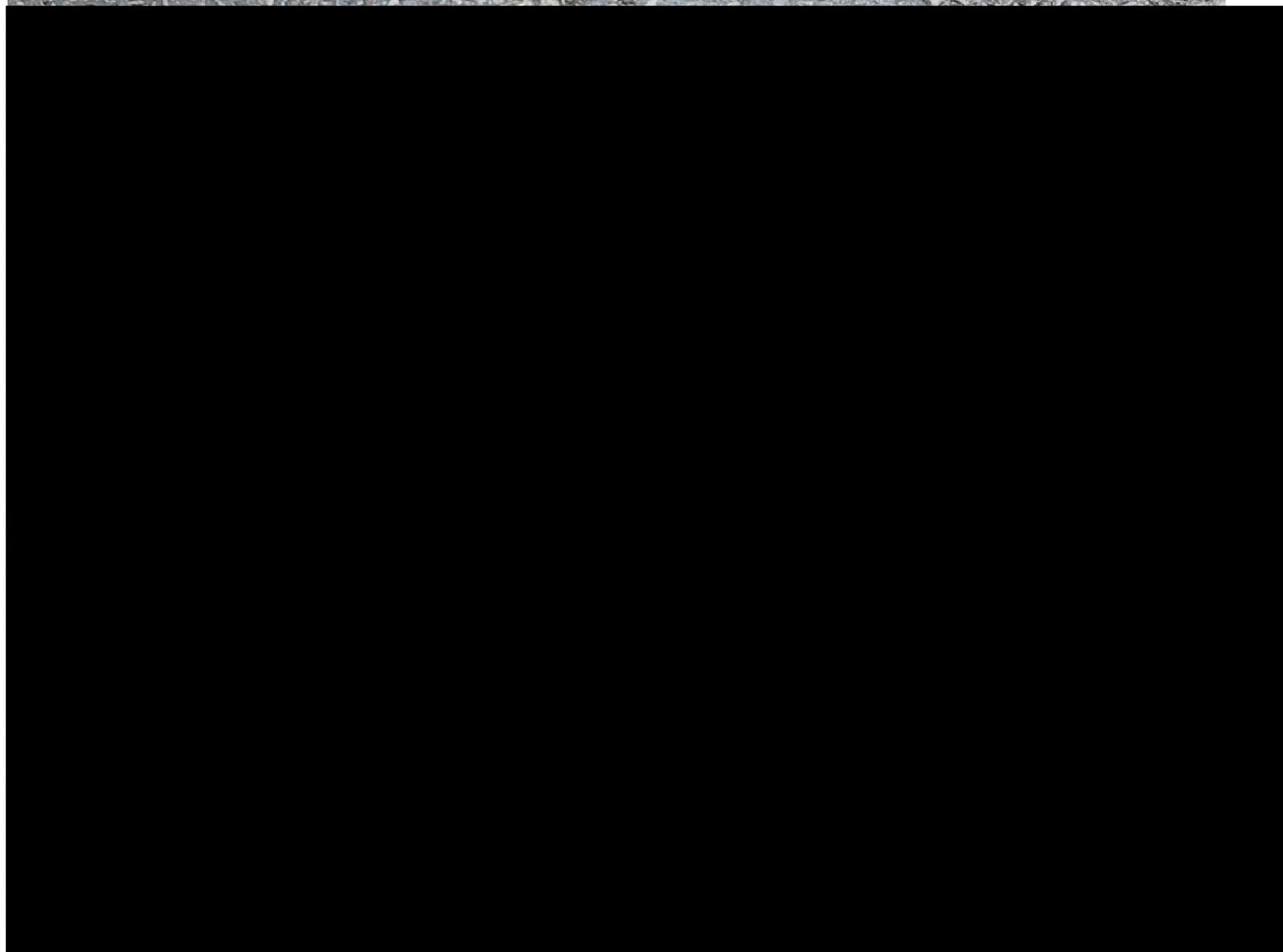
<https://www.britishhedgehogs.org.uk/new-state-of-britains-hedgehog-report-issued-today/>

³ Wembridge, D.E., Newman, M.R., Bright, P.W. & Morris, P.A. (2016) An estimate of the annual number of hedgehog (*Erinaceus europaeus*) road casualties in Great Britain. *Mammal Communications* 2: 8-14.

Evidence of hedgehog

On 19/6/2025, I spotted a dead Hedgehog that had been run over on the Lewes Road outside my house.

Figure 1: Photo of dead Hedgehog on the Lewes Road



The location of the dead Hedgehog is indicated by a pin in the map below.

Figure 2: Location of dead Hedgehog

