

Enviro-Reporter Ltd



Date: 16th March 2026

To: Planning Officer
Mid Sussex District Council

Application Reference: DM/26/0002
Site: Foresters Cottage, Cross Colwood Lane, Bolney RH17 5HU

Ecology Response to Place Services Consultation Comments

Dear Planning Officer,

Please find below ecological clarification submitted in response to the consultation comments issued by Place Services dated 5 February 2026 in relation to the above planning application.

This response addresses the two matters raised under the current holding objection:

- European Protected Species (bats)
- Mandatory Biodiversity Net Gain

1. Bat Clarification – Tree Assessment

A ground-level assessment of all trees within the application boundary was undertaken as part of the Preliminary Ecological Appraisal.

The proposed development affects only one small ornamental cherry tree within the site. This tree was inspected from ground level for potential roost features including cavities, splits, lifted bark, woodpecker holes, rot pockets and other features commonly associated with bat roosting potential.

Tree Ref	Species	Approx. Size / Description	Bat Roost Features Observed	PRF Category	Survey Requirement	Proposed Action
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T1	Cherry (<i>Prunus</i> sp.)	Small ornamental garden tree, approximately 4–5 m height, located within rear garden footprint	No cavities, splits, lifted bark, rot holes, woodpecker holes, dense ivy cover, or other features capable of supporting roosting bats observed from ground level	Negligible	No further bat survey required	Tree may be removed using precautionary soft-fell approach
T2	Retained boundary tree(s)	Adjacent retained trees outside direct construction footprint	No works proposed; trees retained and protected	Not applicable	No survey required	Retain and protect during construction

Assessment Notes

The tree proposed for removal (T1) was inspected from ground level in accordance with current good practice guidance for preliminary bat roost assessment.

No Potential Roost Features (PRFs) were identified.

The tree is therefore assessed as having negligible bat roost potential.

As a precaution, tree removal will be undertaken carefully, with works stopping immediately should any previously obscured feature become apparent during dismantling.

The tree is therefore assessed as having negligible bat roost potential, and no further bat survey effort is considered necessary in relation to tree removal.

All retained trees remain unaffected by the proposed works.

As an additional precaution, removal of the small cherry tree will be undertaken using a precautionary soft-fell approach, with sectional dismantling where required, and works will cease immediately should any unexpected bat feature be identified during removal.

The submitted bat emergence survey conclusions for the dwelling remain unchanged, with no confirmed bat roost associated with the building and no further building surveys required.

2. Biodiversity Net Gain – Updated Metric Position

The revised metric confirms:

- On-site baseline habitat value: 1.68 area habitat units
- On-site post-intervention habitat value: 1.60 area habitat units
- On-site net change: –0.08 area habitat units (–4.69%)

A minor on-site shortfall remains due to the limited development footprint and retention of the majority of existing garden habitats.

Off-site Biodiversity Delivery

The shortfall is fully compensated through habitat enhancement on land within the applicant's control.

A total off-site area of 127 m² will be used for biodiversity enhancement, comprising:

- creation of mixed native scrub habitat;
- native tree planting within the same parcel.

The revised metric confirms:

- Off-site baseline habitat value: 0.03 area habitat units
- Off-site post-intervention habitat value: 0.33 area habitat units
- Off-site net gain: +0.30 area habitat units

Overall Biodiversity Outcome

The combined metric confirms:

- Total net unit change: +0.22 area habitat units
- Total net percentage change: +13.16%

This exceeds the statutory minimum requirement of 10% biodiversity net gain.

The metric also confirms that trading rules are satisfied.

The off-site habitat parcel will be secured through the Biodiversity Gain Plan process and managed for a minimum period of 30 years through an appropriate legal mechanism and Habitat Management and Monitoring Plan.

Habitat condition assessments

On-site Baseline Habitat – Modified Grassland

Habitat	UKHab Code	Area	Condition	Statutory Condition Assessment Summary
Modified grassland	g4	0.10556 ha	Poor	The habitat comprises regularly mown amenity grassland with low botanical diversity. Assessment against Statutory Biodiversity Metric condition criteria confirms that the habitat fails to achieve sufficient positive indicator species frequency, has limited sward structural diversity, and is subject to regular intensive management. Although negative

				indicators are limited, the habitat does not satisfy enough criteria to reach moderate condition and is therefore assessed as Poor condition.
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Visible Species Recorded / Observed

- perennial rye-grass (*Lolium perenne*)
- white clover (*Trifolium repens*)
- creeping bent (*Agrostis stolonifera*) locally present
- occasional low-growing broad-leaved lawn herbs





Off-site Baseline Habitat – Modified Grassland

Habitat	UKHab Code	Area	Condition	Statutory Condition Assessment Summary
Modified grassland	g4	0.0127 ha (127 m ²)	Poor	The off-site parcel comprises short, regularly managed amenity grassland with low species richness. Assessment against Statutory Biodiversity Metric condition criteria confirms that the habitat fails to meet sufficient positive indicator thresholds, lacks structural variation, and is subject to regular mowing which prevents development of a diverse sward structure. The habitat therefore qualifies as Poor condition.

Visible Species Recorded / Observed

- perennial rye-grass (*Lolium perenne*)
- white clover (*Trifolium repens*)
- creeping bent (*Agrostis stolonifera*) locally present
- occasional broad-leaved lawn herbs typical of amenity grassland

No species associated with semi-improved or species-rich neutral grassland were observed.



Tree Condition Assessment

Habitat	Metric Category	Condition	Summary
Urban trees – retained groups	NE0014	Good	Trees assessed as healthy with good physiological condition, intact crown structure and no significant decline observed.



Condition Assessment Method

Condition assessments have been undertaken using the Statutory Biodiversity Metric Technical Annex condition criteria (July 2025).

Off-site Biodiversity Delivery

The on-site biodiversity shortfall is fully compensated through habitat enhancement on land within the applicant's control.

A clearly defined off-site parcel of 127 m² is proposed for biodiversity enhancement and will deliver:

- creation of mixed native scrub habitat;
- native tree planting within the same parcel.

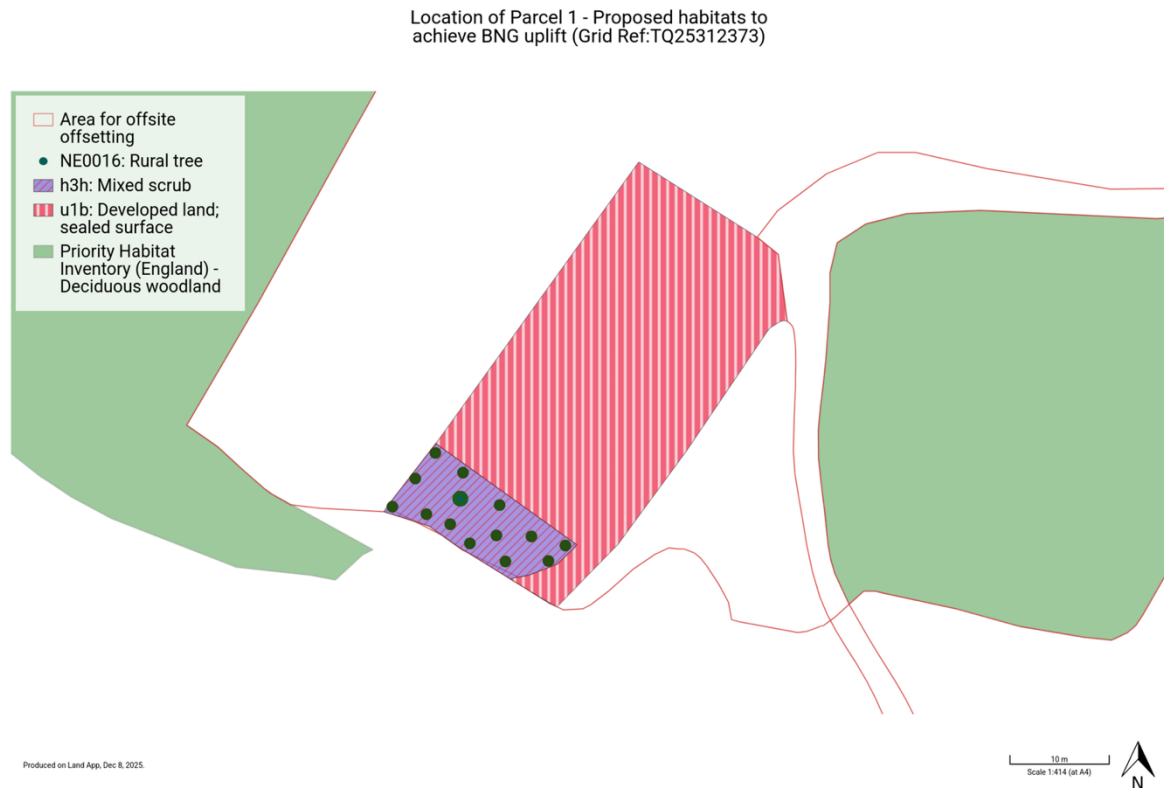
The revised Statutory Biodiversity Metric confirms:

- Off-site baseline habitat value: 0.03 area habitat units
- Off-site post-intervention habitat value: 0.33 area habitat units
- Off-site net gain: +0.30 area habitat units

The enhancement parcel is shown on the accompanying off-site habitat plan as Parcel 1 (Grid Reference TQ25312373).

The parcel will be managed to establish structurally diverse native scrub together with native tree planting, providing strengthened ecological connectivity with adjacent woodland habitat.

Long-term delivery and management of the off-site habitat will be secured for a minimum period of 30 years through the Biodiversity Gain Plan process and an associated Habitat Management and Monitoring Plan secured by condition or legal agreement.



3. Biodiversity Enhancements – To be secured by condition

In addition to metric delivery, further biodiversity enhancement measures are capable of being secured through appropriately worded planning conditions following determination of the application.

Potential enhancement measures include:

- integrated bat roosting features within the replacement dwelling;
- bird nesting features;
- wildlife-sensitive planting within garden areas;
- retention and reinforcement of dark corridors along retained tree lines where practicable.

Final enhancement specifications can be submitted for approval through condition discharge at the appropriate stage of development.

4. Lighting – To be secured by condition

A detailed external lighting strategy is typically secured by planning condition and can be prepared in accordance with current bat-sensitive lighting guidance following determination.

This would include:

- warm white luminaires below 2700K where external lighting is required;
- downward-directed fittings;
- PIR activation where appropriate;
- avoidance of illumination onto retained trees and adjacent woodland edge.

Final lighting details can be submitted for approval prior to installation through discharge of condition.

We trust that the above clarifications, together with the revised biodiversity documentation, address the current ecology holding objection and allow the ecological matters associated with the application to progress toward determination.

Yours faithfully,

Rita Smoldareva MSc
Senior Ecologist
Enviro-Reporter Ltd