

**Brookleigh Eastern Primary School,
Brookleigh, Burgess Hill**

Reserved Matters Application

Ecological Impact Assessment

Client



**Homes
England**

Project No

DARTS-OTH-88

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October 2025

CampbellReith

Multidisciplinary Consultants



Brookleigh Eastern Primary School, Burgess Hill

Ecological Impact Assessment Report

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The conclusions and recommendations contained in this document are based upon information gathered by TEP and provided by third parties. Information provided by third parties and referred to herein has not been independently verified by TEP, unless otherwise expressly stated in the document.

Nothing in this report constitutes legal opinion. If legal opinion is required, the advice of a qualified legal professional should be secured.

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1.0 Introduction

- 1.1 The Environment Partnership (TEP) was commissioned by Homes England in January 2024 to undertake an Ecological Impact Assessment (EclA) to support a reserved matters application to consider access, appearance, landscaping, layout and scale pursuant to application DM/21/3279 (original reference DM/18/5114) for parcel P1.2 comprising of the construction of a primary school with nursery and special support centre, car parking, multi-use games area, playing fields, landscaping and associated infrastructure (hereafter referred to as 'the Site').
- 1.2 The Site lies within Phase 1 (Plot P1.2) of the 'Brookleigh' development (formally Northern Arc) which forms an important part of the wider Burgess Hill Growth Programme and the Burgess Hill Town Wide Strategy. Brookleigh obtained Outline Planning Permission (DM/18/5114) in October 2019 for a comprehensive, phased, mixed-use development. The Outline Planning Application (OPA) was subject to an Environmental Impact Assessment (EIA), which was reported in an Environmental Statement (ES) and an ES Addendum (ESA) in 2018 and 2019 respectively. Approval of the details of the access, appearance, layout, scale and landscaping of the Brookleigh site were Reserved Matters.
- 1.3 This EclA has been undertaken to inform a Reserved Matters Application (RMA) for the Site, pursuant to the application DM/21/3279 (original reference DM/18/5114). It includes details of the methods employed and any limitations of the surveys undertaken. Results are provided with supporting maps, together with an evaluation of the ecological features within the Scheme, an assessment of the potential impacts associated with the development proposals and requirements for mitigation. The assessment has been undertaken with due consideration for current best practice guidelines (CIEEM 2017a¹, 2018²).

Scheme Location

- 1.4 The Site is located off the A273 Isaac's Lane, Burgess Hill, at central grid reference TQ 30823 20741. The Site location is illustrated in **Figure 1**.

¹ CIEEM (2017a) Guidelines for Ecological Report Writing, 2nd Edition. Chartered Institute of Ecology & Environmental Management

² CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.2. Chartered Institute of Ecology and Environmental Management, Winchester

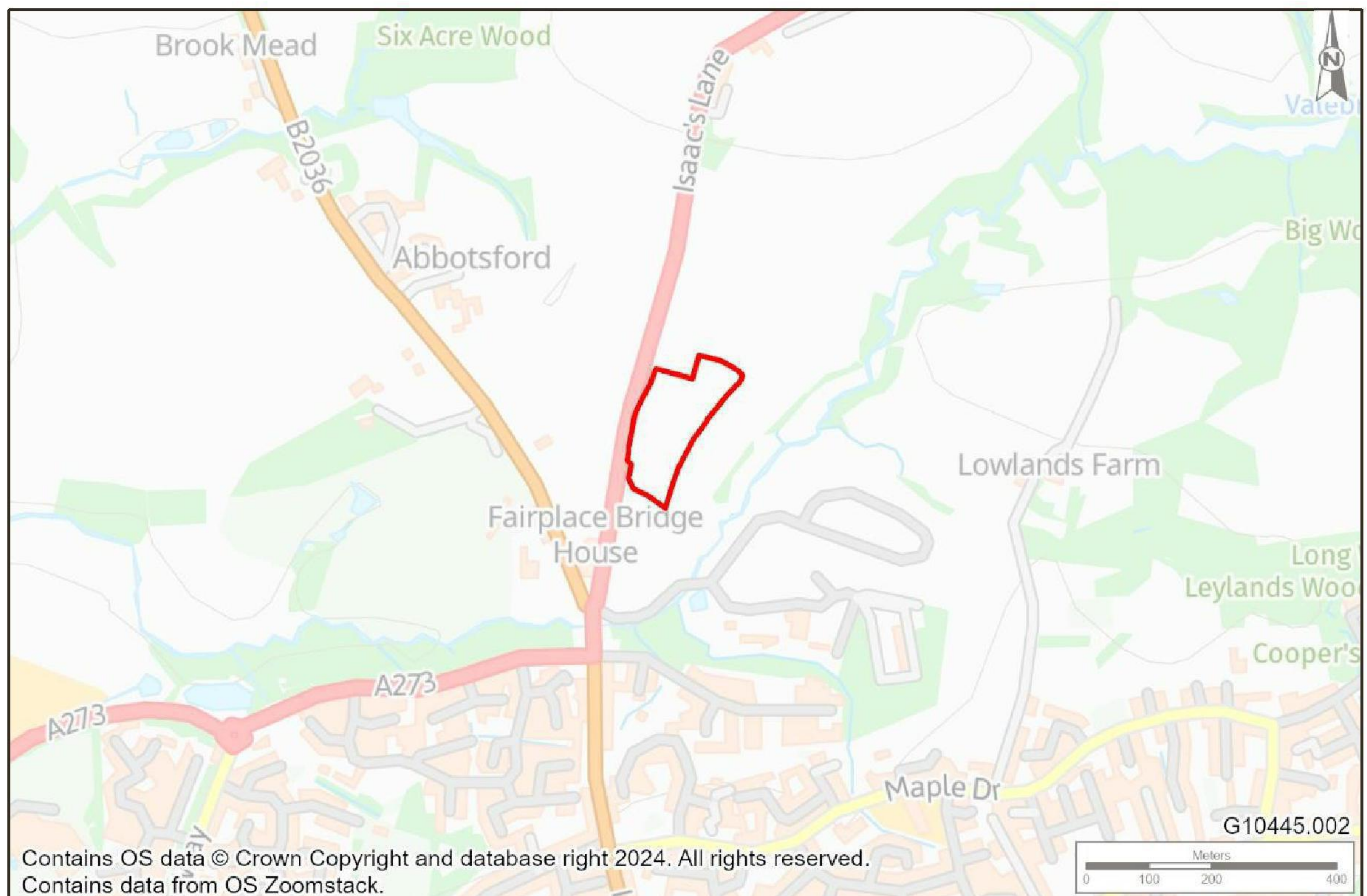


Figure 1: Site location

Proposals

- 1.5 The Site is located within Phase 1 of the Brookleigh development, immediately to east of Isaac's Lane. The Site is identified on the Brookleigh masterplan as 'Primary School (PS) 1', as indicated on **Figure 2**.
- 1.6 A Reserved Matters Application is to be submitted for the primary school at the Site. The proposed layout, upon which this EclA has been based, is illustrated at **Figure 3**.

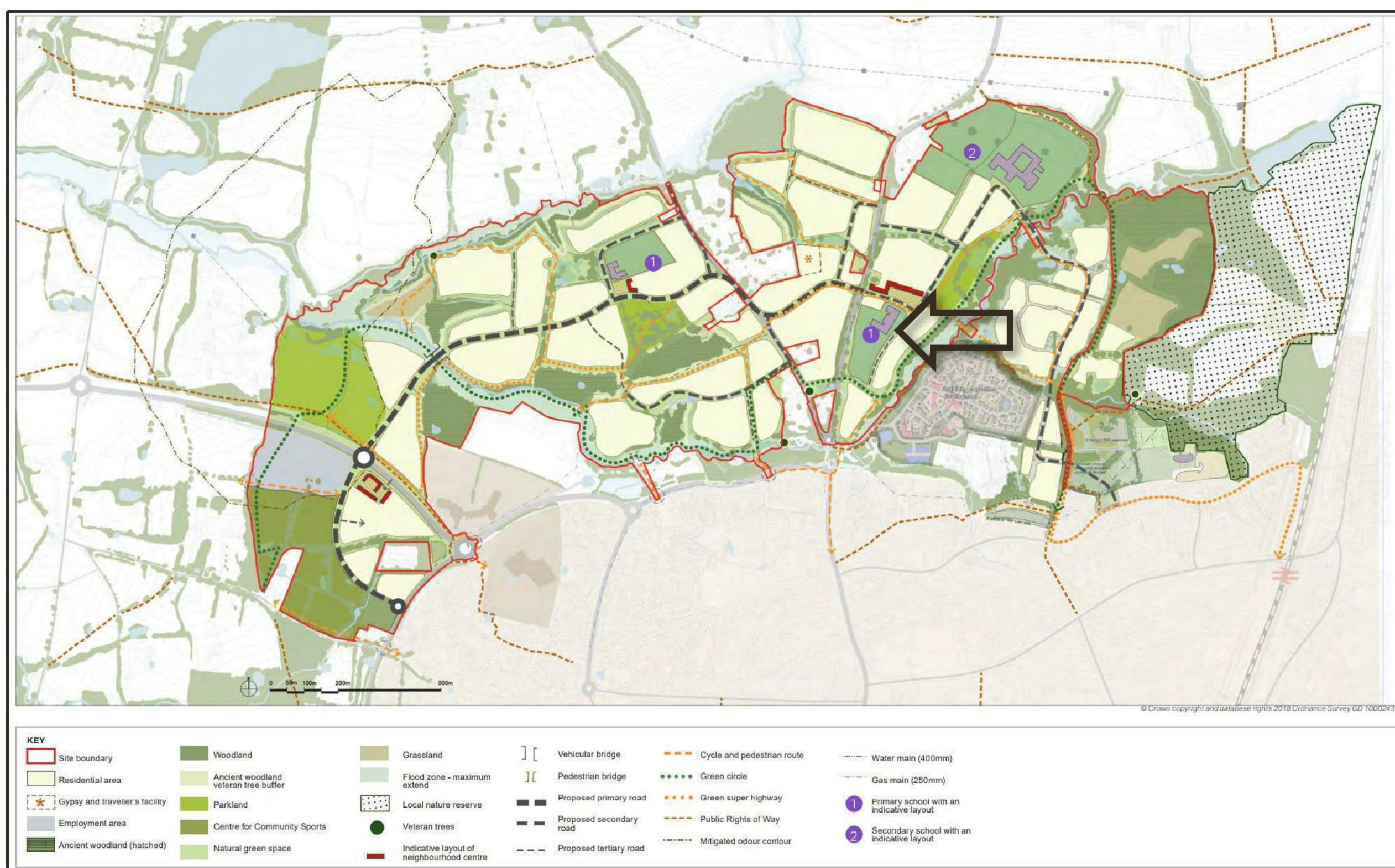


Figure 2: Brookleigh Masterplan, Burgess Hill (replicated from planning application DM/18/5114³), annotated with the black arrow to highlight 'Primary School 1'

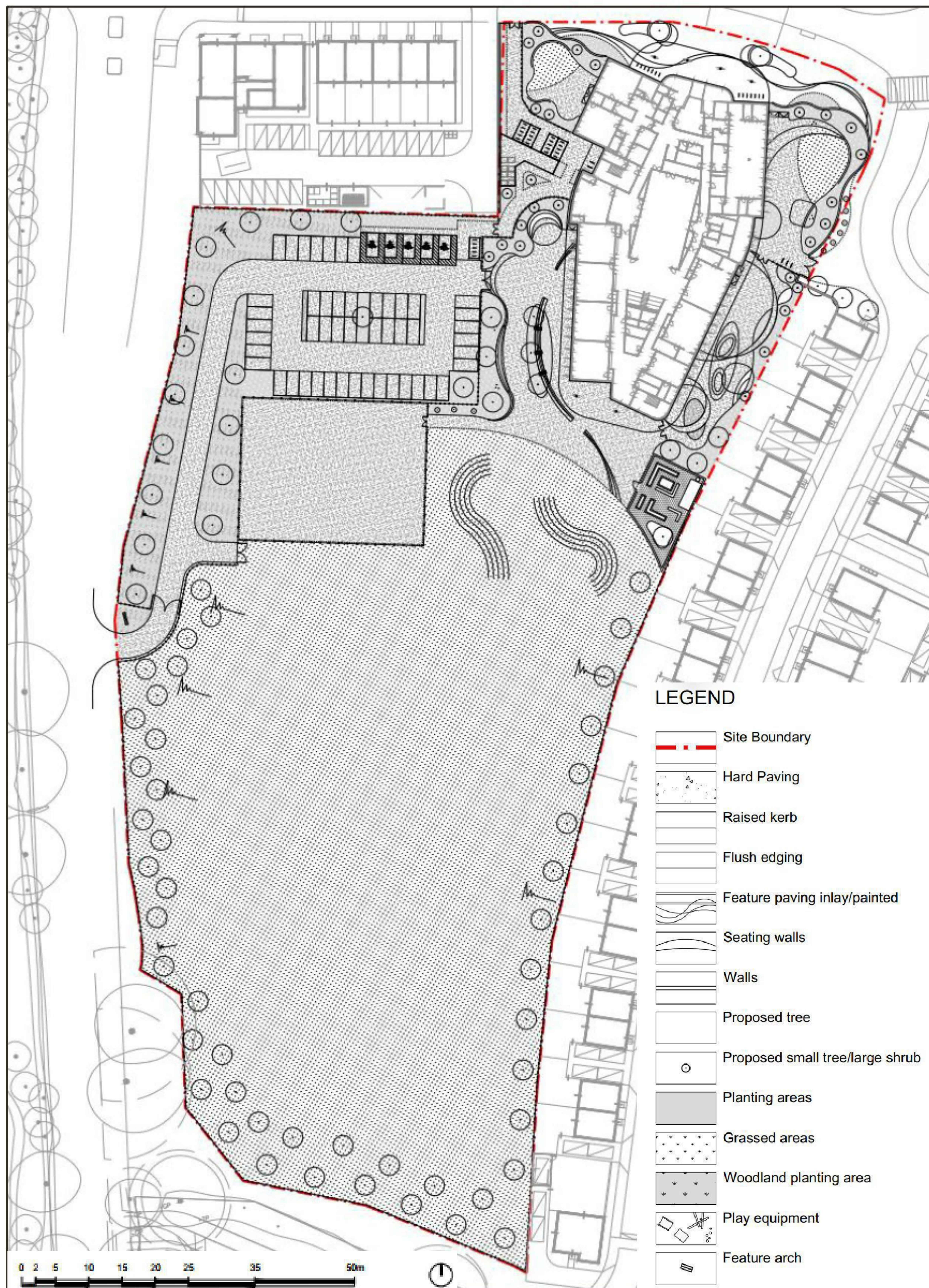


Figure 3: Proposed Layout (replicated from Fabrik drawing D3347-FAB-00-XX-DR-L-1005)

2.0 Methods

Desk Study

2.1 In line with current best practice (CIEEM, 2016⁴, 2017b⁵), information regarding designated sites, notable habitats and existing protected and notable species records of the past decade, within a 1km minimum radius of the Scheme was collated and reviewed to inform this ecological assessment. Data sources and zones of influence (ZOI) applied for the data searches are summarised in **Table 1**.

Table 1: Scope, data sources and ecological Zones of Influence applied for desk study

Scope	Data Source(s)	ZOI
Policy and Related Guidance		
Land allocations and relevant environment / biodiversity policy Local biodiversity priority habitats and species Habitat Network / Nature Recovery Network	Mid Sussex Local Plan 2014-2031 (Adopted 28 th March 2018) ⁶	As applicable to site
Statutory wildlife sites		
Ramsar and proposed Ramsar sites Special Areas of Conservation (SAC), including possible SAC and SAC with marine components Special Protection Areas (SPA) and potential SPA Marine Conservation Zones	Natural England ⁷	10km
Sites of Special Scientific Interest (SSSI) National Nature Reserves (NNR) Marine Nature Reserves (MNR) National Parks		5km
Local Nature Reserves (LNR) Country Parks Strategic Nature Areas		2km
Non-statutory wildlife sites		
Local Wildlife Site (LWS) Regional Parks Green Wedges Wildlife Corridors Designated Road Verge	Sussex Biodiversity Record Centre Mid Sussex Local Plan 2014-2031 (Adopted 28 th March 2018)	2km

⁴ CIEEM (2016) Guidelines for Accessing and Using Biodiversity Data. Chartered Institute of Ecology & Environmental Management

⁵ CIEEM (2017b) Guidelines for Preliminary Ecological Appraisal, 2nd Edition. Chartered Institute of Ecology & Environmental Management

⁶ Mid Sussex District Council (2018) [Online]. Mid Sussex District Plan 2014 - 2031. <https://www.midsussex.gov.uk/media/3406/mid-sussex-district-plan.pdf> [10/07/2024]

⁷ Public sector information

Scope	Data Source(s)	ZOI
Notable habitats		
Ancient Woodland Habitats of Principal Importance (HPI) Local Biodiversity Action Plan (LBAP) habitats Main rivers	Natural England ⁷ Environment Agency ⁷ Sussex Biodiversity Record Centre Google Earth	0.25km
Protected or notable species		
Pre-existing records for protected or notable species, non-native invasive species	Sussex Biodiversity Record Centre	2km
Protected species licences granted by Natural England Great crested newt survey pond records (2017 – 2019) held by Natural England	Natural England ⁷	2km

2.2 Regionally Important Geological Sites (RIGS) other geological features do not fall within the scope of this EclA and are not discussed within this report.

2.3 Habitats of principal importance (HPI) are those listed by the requirements of Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act 2006⁸.

2.4 Notable species included those listed under any of the following:

- Protected animal species under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (EPS);
- Protected bird species under Schedule 1 of the Wildlife and Countryside Act 1981, as amended (WCA1);
- Protected animal species under Schedule 5 of the Wildlife and Countryside Act 1981, as amended (WCA5);
- Protected plant species under Schedule 8 of the Wildlife and Countryside Act 1981, as amended (WCA8);
- Invasive non-native plant species under Schedule 9 of the Wildlife and Countryside Act 1981, as amended (WCA9);
- Invasive non-native species under the Invasive Alien Species (Enforcement and Permitting) Order 2019 (IAS);
- Species of principal importance (SPI) as listed by the requirements of S41 of NERC;
- [REDACTED]
- Red and Amber listed Birds of Conservation Concern (BRd/BAm).

⁸ Section 41 of the Natural Environment and Rural Communities Act requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England.

2.5 Previous survey information submitted in support of the Brookleigh Outline Planning Application (OPA) (Application ref. DM/18/5114) was reviewed (ES Volume 1 Chapter 6⁹). Previous survey information completed in 2021 and submitted in support of the RMA for Phase 1B was also reviewed (application ref DM/21/3870). This included the following by Greengage Environmental Ltd:

- Ecological Management Plan, (October 2021);
- Ecological Impact Assessment (October 2021);
- Biodiversity Impact Assessment (November 2021);
- Additional Ecology Survey Results (January 2022);
- Hedgerow Survey (April 2022); and
- Biodiversity Net Gain Update (May 2021).

Limitations

2.6 Species records can provide a useful indication of the species present within the search area, although the absence of a given species from the dataset cannot be taken to represent actual absence.

Habitats and Flora

Habitat Survey

- 2.7 An extended Phase 1 habitat survey was completed 17th May 2024. The survey was carried out in accordance with the Phase 1 habitat assessment methods (JNCC, 2010¹⁰). The habitat survey encompassed the site and the immediately surrounding habitats that could be safely accessed or viewed.
- 2.8 Habitats were mapped and features of ecological value recorded as target notes. Any evidence of protected or non-native invasive plant species was also noted. Flora species were documented for each habitat type or parcel recorded during the habitat survey using the DAFOR¹¹ scale. Any ecological feature of note was recorded as a target note.

⁹ Accessible via Mid Sussex planning portal <https://pa.midsussex.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=PK8M4RKT04L00>

¹⁰ JNCC, (2010), Handbook for Phase 1 habitat survey – a technique for environmental audit, JNCC, Peterborough

¹¹ Plant species were recorded for each habitat or habitat feature using the DAFOR scale for semi-quantitative sampling, to provide a quick estimate of the relative abundance of species (generally plants) in a given area. Abundance (number of individuals) and cover (area coverage) are often used interchangeably in this type of surveying, although in fact they may have very different meanings. The DAFOR scale adopted for habitat survey is: D = Dominant (>75% e.g. the most common species in the area) | A = Abundant (51-75% e.g. very common in several places / many occurrences over a substantive area) | F = Frequent (26-50%; e.g. several occurrences) | O = Occasional (11-25% e.g. individuals in several places or a small area) | R = Rare (1-10% e.g. a small number of individuals).

Habitat Condition Survey

- 2.9 During the survey, the habitat condition was assessed using the statutory biodiversity metric condition methodology (DEFRA 2023¹²).

Limitations

- 2.10 The survey was conducted early-season so some later flowering species may have been missed. However, the flora present allowed the habitats to be identified and condition assessment to be undertaken with a high level of confidence.

Fauna

- 2.11 Ordnance Survey maps and aerials were reviewed to identify potentially suitable habitats offsite within influence (e.g. dispersal distances for mobile species) of the Scheme. The Ecological Desk Study identified any pre-existing records for protected and notable species within at least 1km of the Scheme in addition to a review of historical survey information submitted in support of the planning application for the wider Brookleigh development.
- 2.12 The habitat survey was expanded to include an assessment of the suitability of habitats recorded to support protected fauna and note the presence of signs of any protected fauna or those of conservation concern, in line with the CIEEM Guidelines for Preliminary Ecological Appraisal, 2017¹³. Any signs indicating the presence of these species were recorded.
- 2.13 In combination, this data informed the ecological evaluation of the Scheme and impact assessment for the proposed development.

Limitations

- 2.14 An absence of pre-existing species records (from the desk study) does not indicate the absence of protected species from the search area. Mobile fauna will move into and out of areas over time. For these reasons a 'good practice' cautionary approach has been taken in the prediction of impacts. Where there is any doubt, except where specifically noted, species are assumed to be present when suitable habitats are present and within the natural range of the species under consideration, and the impact assessment assumes a higher level of significance (within the spectrum of possible significance).

¹² DEFRA 2023 UK habitat condition assessment. Available at [https://assets.publishing.service.gov.uk/media/669e5db4fc8e12ac3edb0198/Statutory Biodiversity Metric Condition Assessments23.07.24.xlsx](https://assets.publishing.service.gov.uk/media/669e5db4fc8e12ac3edb0198/Statutory_Biodiversity_Metric_Condition_Assessments23.07.24.xlsx)

¹³ CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

Surveyor Competencies

- 2.15 TEP surveyors meet the competency recommendations set out by CIEEM for PEA and in accordance with BS42020:2013¹⁴. Habitat surveyors were accredited with Field Identification Skills Certification to Level 3. Further details of competencies can be provided on request.

Ecological Assessment Process

- 2.16 This EclA follows the published guidelines (CIEEM, 2018) and accepted best practice approach (BS42020:2013¹⁵) of the mitigation hierarchy whereby impacts are first avoided or, where this is not possible, reduced or mitigated or, as a last resort, compensated.
- 2.17 In summary, the following procedure was undertaken during this EclA:
- Describe the baseline and identify important ecological features;
 - Describe important ecological features and identify those which may potentially be affected by the Scheme;
 - Identify potential impacts upon important ecological features and characterise the effect of such impacts (in respect of biophysical changes and taking account of relevant aspects of ecosystem structure or function);
 - Incorporate measures to avoid or reduce these effects;
 - Determine whether residual ecological effects are considered significant after avoidance or mitigation;
 - Identify appropriate compensation measures to offset significant residual effects; and
 - Identify opportunities for ecological enhancement.
- 2.18 Important ecological features are identified and valued, ecological impacts are characterised and assessed, and recommendations for appropriate mitigation, compensation and enhancement are made, in accordance with CIEEM guidance.
- 2.19 BS42020:2013 defines a significant effect as one “which is important, notable, or of consequence, having regard to its context”. CIEEM describes significance as “a concept related to the weight that should be attached to effects when decisions are made”. CIEEM defines an ecological effect as significant if it is “sufficiently important to require assessment and reporting so that the decision maker is adequately informed of the environmental consequences of permitting a project”.

¹⁴ British Standards Institution (2013) BS42020:2013 Code of Practice for Planning and Development. London, BSI

¹⁵ British Standards Institution (2013) BS 42020:2013: Biodiversity — Code of practice for planning and development. BSI Standards Limited, London

2.20 BS42020:2013 sets out a practical approach to determining the significance of an ecological effect, applicable at all levels of decision making in legal and policy terms, as follows:

- Will the effect on biodiversity influence the balance of planning considerations and therefore the decision as to whether planning permission is likely to be refused or granted; and
- If planning permission is granted, is the effect important enough to warrant the use of planning conditions and/or obligations to guarantee proposed measures or to impose restrictions, or to seek further requirements (e.g. for mitigation, compensation, enhancement, monitoring or management).

2.21 Significance is therefore assessed on a case-specific basis according to the importance of the ecological feature (wildlife site, habitat or species) within the conservation hierarchy, and the effect upon it.

Assumptions

2.22 Information provided by third parties, including publicly available information, is assumed to be correct at the time of publication.

3.0 Results

Legislation and Planning Context

3.1 International and national legislation of key relevance to biodiversity and this EclA include:

- The Convention on Wetlands of International Importance especially as Waterfowl Habitat ('Ramsar Convention' or 'Wetlands Convention'), Ramsar, 2.2.1971;
- The Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention), Bern, 1979;
- The Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention or CMS), Bonn, June 1979;
- The Convention on Biological Diversity (Biodiversity Convention or CBD), Rio de Janeiro, June 1992;
- Conservation of Habitats and Species Regulations 2017 (the 2017 Regulations), (SI 2017/1012);
- Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (the 2019 Regulations), (SI 2019/579);
- Wildlife and Countryside Act (WCA) 1981 c.69;
- Environment Act 2021 c.30 <https://www.legislation.gov.uk/ukpga/2021/30/>;
- Countryside and Rights of Way Act (CROW) 2000 c.37;
- Natural Environment and Rural Communities (NERC) Act 2006 c.16;
- Hedgerow Regulations 1997 (SI 1997/1167);
- [REDACTED]
- Wild Mammals (Protection) Act (WMPA) 1996 c.3.

3.2 The NPPF at Chapter 15: Conserving and Enhancing the Natural Environment requires that development delivers net gains in biodiversity in addition to minimising the impacts on biodiversity. The chapter highlights the need to protect and enhance valued landscapes, geological conservation interests and soils, as well as recognising the wider benefits of ecosystems.

3.3 The current Local Plan is the Mid Sussex District Plan 2014-2031 (adopted 28th March 2018). The local plan provides a framework for new development, employment growth, infrastructure, and measures to ensure the protection of the countryside, as well as addressing a number of local issues including housing provision and commuting patterns.

- 3.4

The following local policies relate to biodiversity and nature conservation and are of most relevance to the proposals:

 - Policy DP29 – Noise, Air and Light Pollution
 - Policy DP37 – Trees, Woodland and Hedgerows
 - Policy DP38 – Biodiversity
 - Site Allocations
- 3.5

The Site is not allocated for biodiversity purposes but adjacent areas of land to the north and east are allocated under Policy DP12: Protection and Enhancement of Countryside, and Policy DP38: Biodiversity in Mid Sussex’s Site Allocations and Development Management Policies Local Plan, adopted 28th March 2018.

Wildlife Sites

Statutory Wildlife Sites

- 3.6

No statutory wildlife sites of international ecological significance (Ramsar, SAC or SPA) were identified within 10km of the Site. **Table 2** summarises the statutory designated wildlife sites of national ecological significance (**Figure 4**) and local ecological significance (**Figure 5**) identified by the desk study within potentially influencing distance(s) of the site.

Table 2: Statutory wildlife sites identified within potential influencing distance of the Site

Site Name	Summary	Distance and Direction from Site
Ditchling Common SSSI	This site contains a range of grassland types which have resulted from the wide variation in drainage conditions. The flora includes a number of locally uncommon plants. The butterfly and moth fauna is rich and contains several uncommon species including four moths associated with dyer’s greenweed and two woodland butterflies, small pearl bordered fritillary and green hairstreak. The areas of woodland and scrub are locally valuable for breeding birds such as willow warbler, blackcap, whitethroat, linnet and yellow hammer.	2.7km south-east of the Site
High Weald Area of Outstanding Natural Beauty (AONB)	A medieval landscape of wooded, rolling hills studded with sandstone outcrops; small, irregular-shaped fields; scattered farmsteads; and ancient routeways.	3.2km north-west of the Site
Bedelands Farm Local Nature Reserve (LNR)	Ancient meadows, woodland, hedgerows and ponds, covering 33 hectares.	0.6km east of the Site

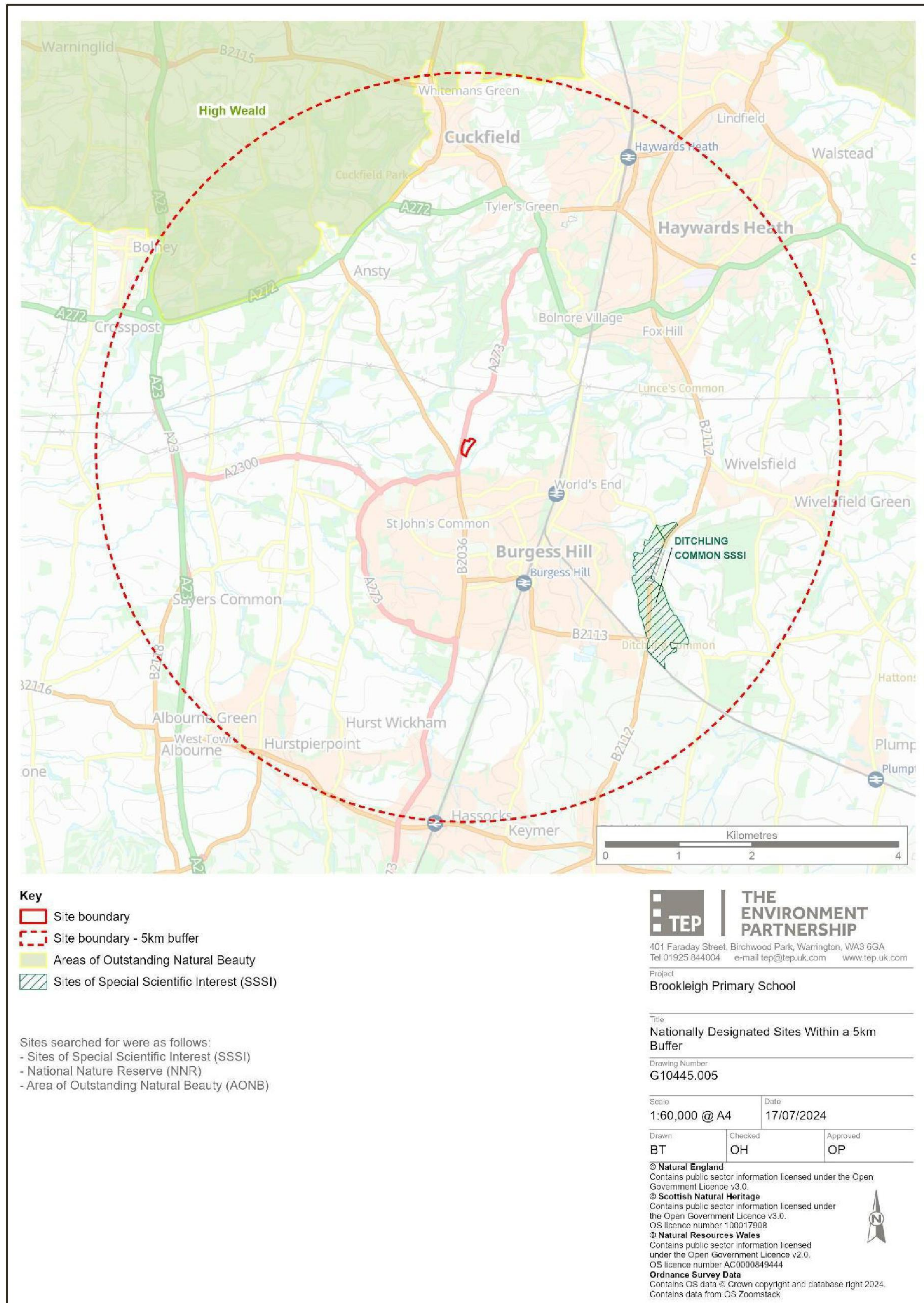


Figure 4: Statutory wildlife sites of national significance within 5km of the Site



SSSI Impact Risk Zones

3.7 SSSI Impact Risk Zone (IRZ)¹⁶ are zones determined by Natural England which identify likely impacts upon SSSIs, SACs, SPAs or Ramsar sites that may result from planned development. The Site lies within one SSSI IRZ, but the proposals (primary school) do not meet any of the risk parameters identified for this IRZ (which included: airports, helipads and other aviation proposals, oil & gas exploration/extraction or livestock & poultry units with a floorspace > 500m², slurry lagoons > 750m² & manure stores > 3500 tonnes).

Non-Statutory Wildlife Sites

3.8 Table 3 and Figure 6 show the non-statutory designated wildlife sites within influencing distance of the Site.

Table 3: Non-statutory Local Wildlife Sites identified by Sussex Biodiversity Record Centre within 2km of the Site

Site Name and Map Reference (refer to Figure 6)	Summary	Closest distance and direction relevant to Site
Burgess Hill Railway Lands <i>Map reference: 1</i>	A mosaic of semi-natural habitats, including lowland mixed deciduous woodland, open grassland and scrub, all within an urban setting. Its location next to the railway line means that it forms part of an important ecological corridor that allows the movement of fauna across the local landscape. Part of the woodland is ancient and semi-natural.	1.3km south-east of the site
Great Wood & Copyhold Hanger <i>Map reference: 2</i>	A wooded gill valley which is ancient in origin, and several old abandoned water meadows. The ground flora is generally quite species-rich and well-developed, becoming increasingly so nearer the streams. The site also has particularly good fern and bryophyte communities.	0.6km north of the site
Bedelands <i>Map reference: 3</i>	A number of woodland blocks surrounding fields of open grassland. The lowland mixed deciduous woodland generally comprises hornbeam <i>Carpinus betulus</i> and hazel <i>Corylus avellana</i> coppice with mature Pedunculate oak <i>Quercus robur</i> standards, much of which is also ancient woodland. Most of the fields contain traditionally managed lowland meadow grassland, with species-rich swards.	0.7km east of the site

¹⁶ Available to view using www.magic.gov.uk

Site Name and Map Reference (refer to Figure 6)	Summary	Closest distance and direction relevant to Site
Pond Lye <i>Map reference: 4</i>	The site contains a diversity of important habitats, including wetland, woodland and grassland, within a site of only modest size, but is dominated by the open water of Pond Lye.	1.5km north-west of the site
Catt's Wood Complex <i>Map reference: 5</i>	Comprises a number of interconnected blocks of lowland mixed deciduous woodland, much of which is also species-rich ancient woodland. A stream flows through the site. Other subsidiary habitats include small open areas of neutral grassland and acid grassland, and a number of ponds scattered across the site. A large number of notable species have been recorded, including hazel dormouse.	1.8km north-east of the site
Keymer Tile Works <i>Map reference: 6</i>	A working clay pit supporting a matrix of successional habitats ranging from temporary pools and bare clay through unimproved grassland to dense scrub, deciduous woodland and willow carr. It is a very varied site of particular importance for breeding amphibians and is also of high geological interest.	1.7km south-east of the site

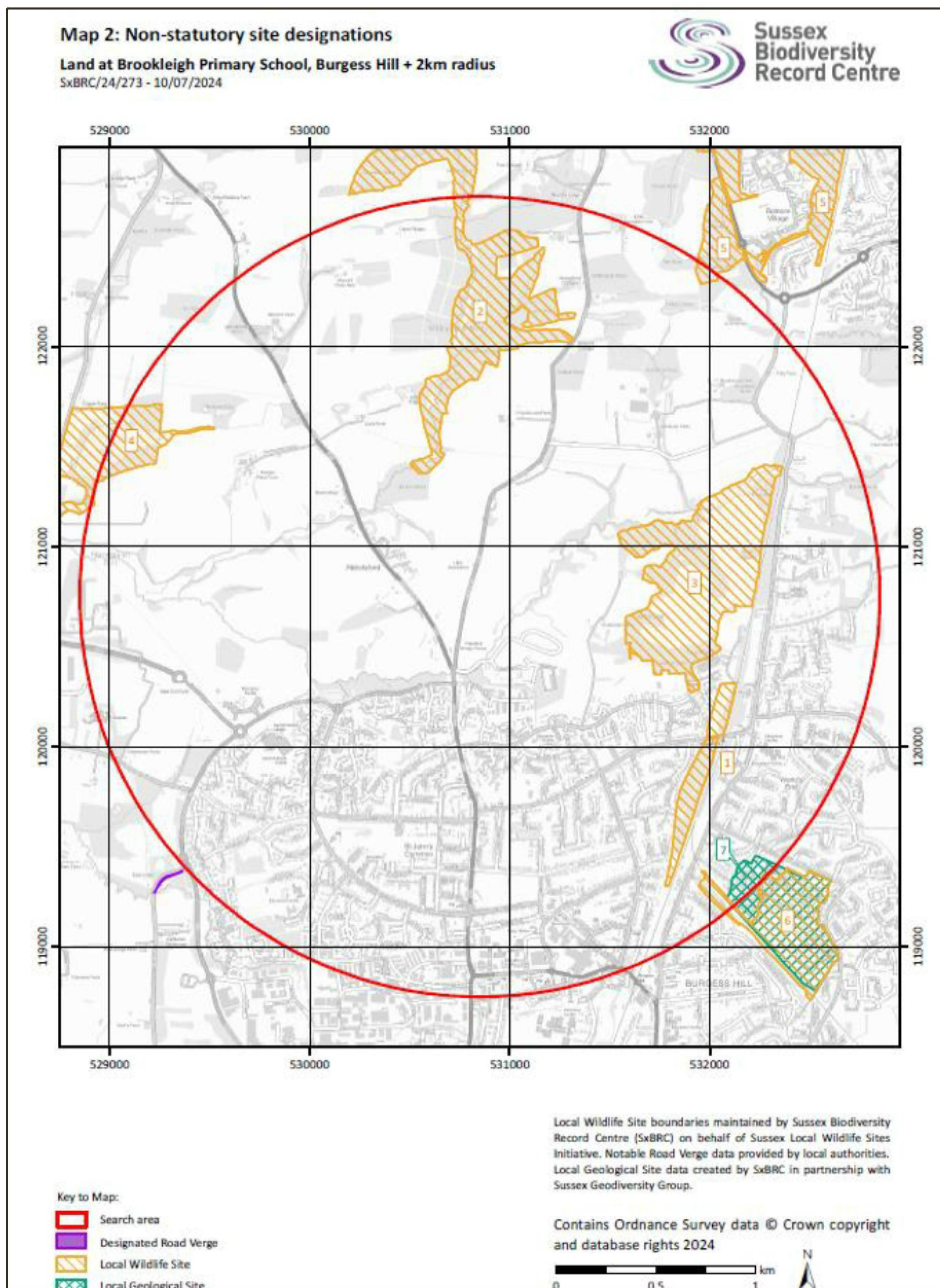


Figure 6: Non-statutory local wildlife site designations identified by Sussex Biodiversity Record Centre within 2km of the Site

Nature Recovery Strategies

- 3.9 Local nature recovery strategies (LNRS) are the emerging nationwide system of spatial strategies to help reverse the decline of biodiversity and were introduced through the Environment Act 2021. Each LNRS will be locally led by a 'responsible authority'. In Sussex the responsible authorities will be West Sussex County Council for the West Sussex LNRS and East Sussex County Council for the East Sussex and Brighton & Hove LNRS. As a local authority, Mid Sussex District Council is a 'supporting authority' for the LNRS along with Natural England. The preparation of the LNRS is underway.
- 3.10 In lieu of a published LNRS, Habitat Network maps produced by Natural England¹⁷ provide a useful insight. The Site is within the National Habitat Network Enhancement Zone 2 (**Figure 7**).

Notable Habitats

- 3.11 No notable habitats were identified in or within 250m of the Site from the desk study (**Figure 8**).
- 3.12 Blocks of deciduous woodland (HPI) were present within the 250m buffer around the Site with the closest being approximately 75m to the east.
- 3.13 Hedgerows (HPI) were present along Isaac's Lane to the west of the Site. The hedgerow adjacent to the Site compound had already been removed.

Protected and Notable Species

Pre-existing Survey Data

- 3.14 Pre-existing surveys were completed by AECOM in 2018 across the wider Brookleigh site including the Site. Greengage Environmental Ltd completed a suite of update surveys for Phase 1B, including for hedgerows, great crested newt, [REDACTED] bat activity, bat emergence, and hazel dormouse during the course of summer 2021 to spring 2022. While not directly covering the Site, the Phase 1B survey results provide relevant context for this EclA. Results of the previous surveys are discussed in relevant sections below.

Protected Species Licences

- 3.15 A review of Natural England's open datasets for granted protected species licences returned 50 class licence returns and five sets of pond survey data for great crested newts (GCN) *Triturus cristatus* between 2017 and 2019 within 2km of the Site. Of these, the nearest positive GCN record return was located 0.1km north-east of the Site.

¹⁷ Available to view using www.magic.gov.uk

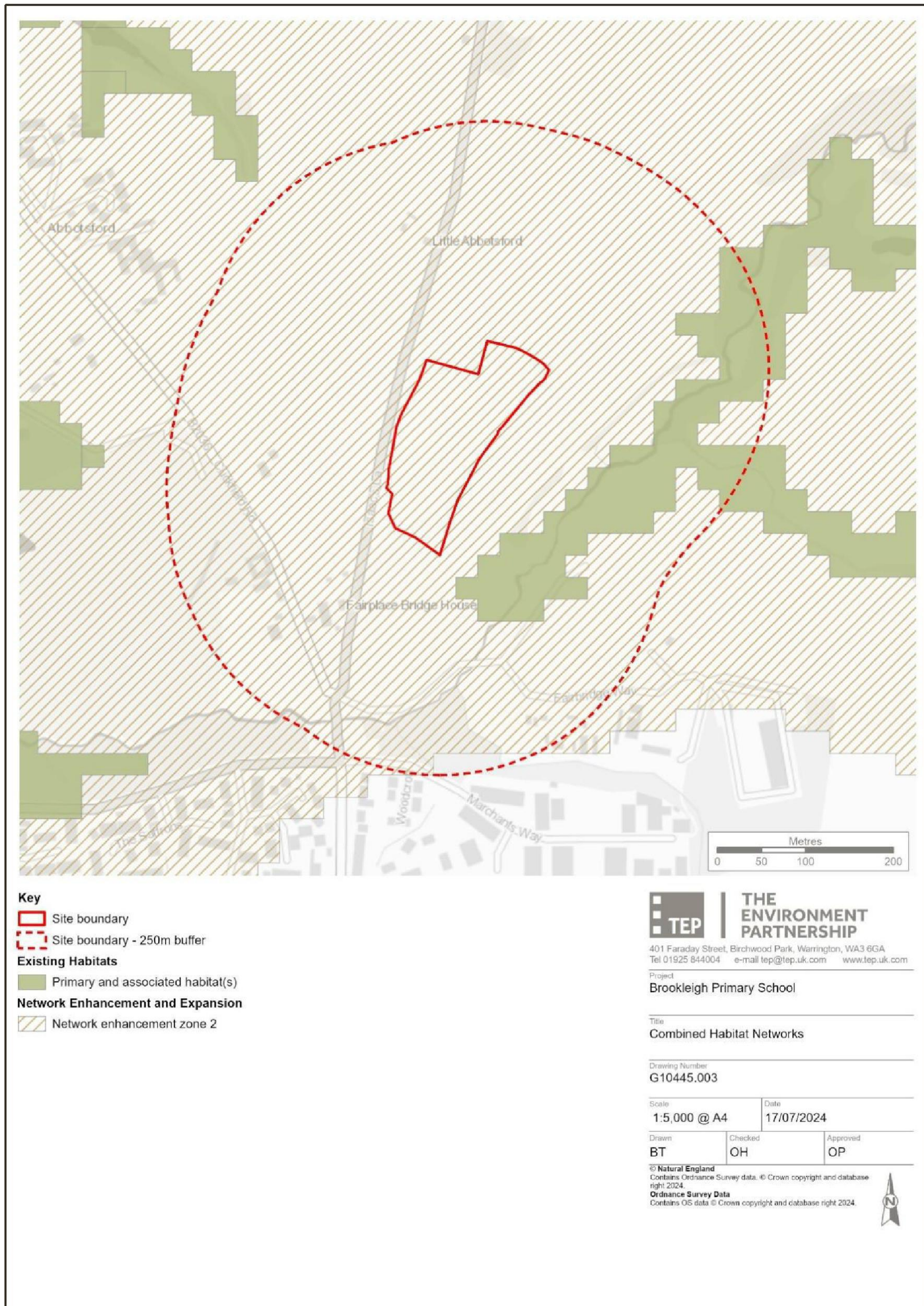


Figure 7: The National Habitat Network, local to the Site

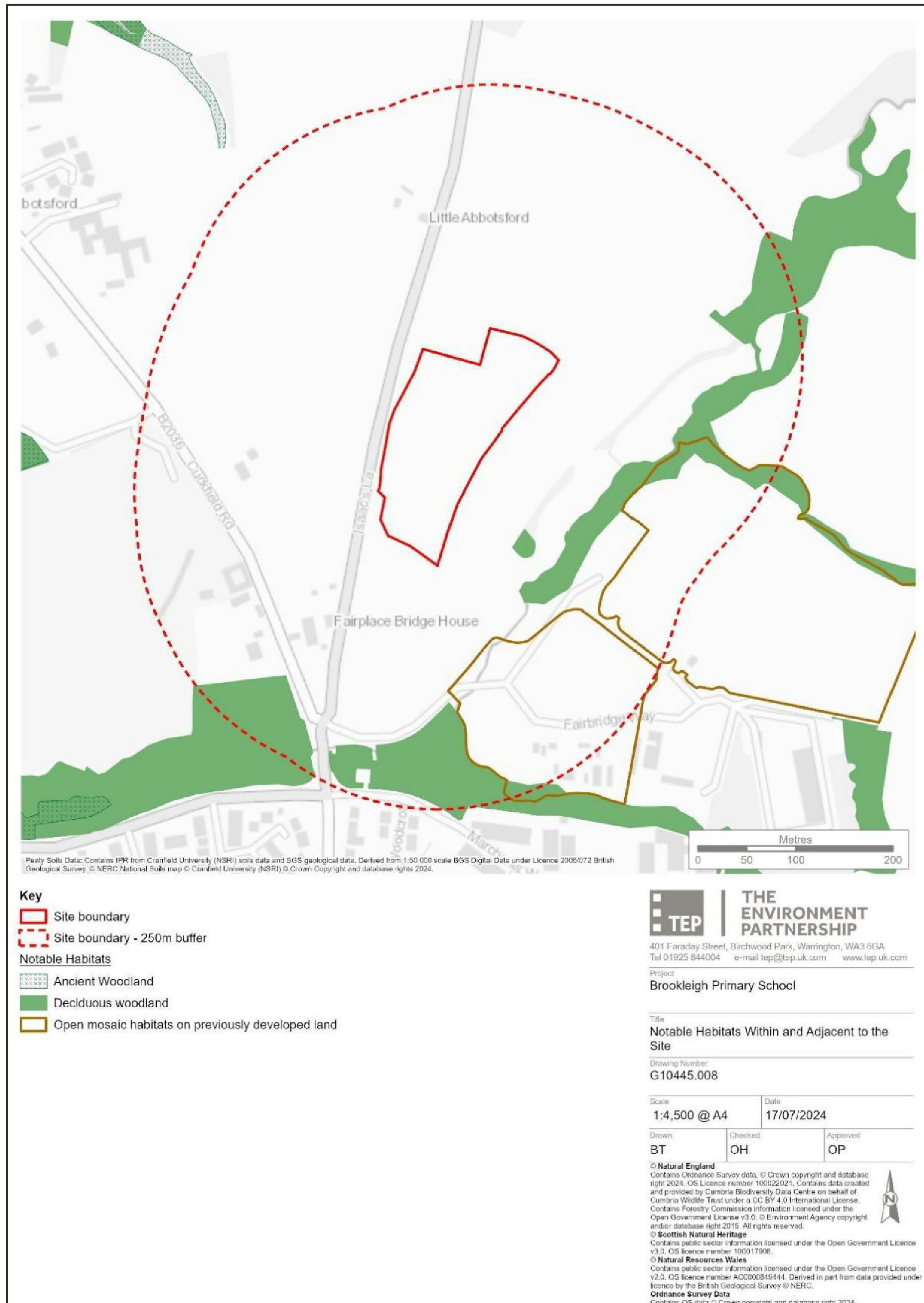


Figure 8: Notable habitats within 0.25km of the Site

- 3.16 Desk study identified 18 Natural England European Protected Species mitigation (EPSM) licences within 2km of the Site which are summarised in **Table 4**. The closest of these licences was for hazel dormouse (2020-48403-EPS-MIT) which was located 148m north-east of the Site and remains valid until 2026.

Table 4: Natural England mitigation licences within 2km of the Site

Species	Licence Number	Dates	Licensable Activities
Great Crested Newt	2014-689-EPS-MIT	11/07/2014 – 30/06/2027	Impact on a breeding site Damage of a resting place Destruction of breeding site Destruction of a resting place
Great Crested Newt	2014-689-EPS-MIT-1	04/11/2014 – 30/06/2027	Impact on a breeding site Damage of breeding site Damage of a resting place Destruction of a resting place
Great Crested Newt	2014-689-EPS-MIT-2	12/09/2016 – 30/06/2027	Impact on a breeding site Damage of breeding site Damage of a resting place Destruction of a resting place
Great Crested Newt	2015-13175-EPS-MIT	13/04/2016 – 30/06/2026	Impact on a breeding site Destruction of breeding site
Great Crested Newt	EPSM2011-3094	11/07/2011 – 01/07/2015	Destruction of a resting place
Common Pipistrelle	2016-26440-EPS-BDX	12/10/2016 – 31/10/2016	Impact on a breeding site Damage of breeding site Damage of a resting place Destruction of breeding site Destruction of a resting place
Great Crested Newt	EPSM2009-984	01/10/2010 – 31/12/2011	Destruction of a resting place
Great Crested Newt	2014-689-EPS-MIT-3	25/10/2018 – 30/06/2027	Damage of a resting place Destruction of a resting place
Great Crested Newt	2014-689-EPS-MIT-4	13/01/2021 – 31/07/2027	Damage of a resting place Destruction of a resting place
Hazel or Common dormouse	2020-44380-EPS-MIT	10/02/2020 – 31/12/2029	Impact on a breeding site Damage of breeding site Damage of a resting place Destruction of breeding site Destruction of a resting place
Hazel or Common dormouse	2020-44380-EPS-MIT-1	03/09/2020 – 31/12/2029	Impact on a breeding site Damage of breeding site Damage of a resting place Destruction of breeding site Destruction of a resting place
Hazel or Common dormouse	2020-44380-EPS-MIT-2	26/10/2020 – 31/12/2029	Damage of a resting place Destruction of a resting place

Species	Licence Number	Dates	Licensable Activities
Hazel or Common dormouse	2020-45515-EPS-MIT	24/03/2020 – 31/12/2025	Impact on a breeding site Damage of breeding site Damage of a resting place Destruction of breeding site Destruction of a resting place
Hazel or Common dormouse	2020-45515-EPS-MIT-1	24/03/2020 – 31/12/2025	Impact on a breeding site Damage of breeding site Damage of a resting place Destruction of breeding site Destruction of a resting place
Hazel or Common dormouse (Located 148m north-east of the Site)	2020-48403-EPS-MIT	24/09/2020 – 31/12/2026	Impact on a breeding site Destruction of breeding site Destruction of a resting place
Brown long-eared bat Soprano Pipistrelle	2020-50065-EPS-MIT	29/10/2020 – 28/10/2025	Destruction of a resting place
Soprano Pipistrelle	2014-2981-EPS-MIT	19/09/2014 – 01/08/2017	Impact on a breeding site Damage of breeding site
Hazel or Common dormouse	2021-50974-EPS-MIT	26/02/2021 – 31/12/2026	Impact on a breeding site Destruction of breeding site Destruction of a resting place

Pre-existing Species Records

3.17 Protected and notable species records returned from Sussex Biodiversity Record Centre for the last ten years within 2km of the Site are summarised in **Table 5**.

Table 5: Summary of notable or protected species records and count of records returned within 2km of the (data searches provided by Sussex Biodiversity Record Centre)

Amphibian Species Records	Nr	Bird Species Records	Nr
Common Frog (<i>Triturus cristatus</i>)	7	Barn Owl (<i>Tyto alba</i>)	5
Common Toad (<i>Bufo bufo</i>)	7	Bullfinch (<i>Pyrrhula pyrrhula</i>)	3
Great Crested Newt (<i>Triturus cristatus</i>)	13	Cuckoo (<i>Cuculus canorus</i>)	5
Smooth Newt (<i>Lissotriton vulgaris</i>)	8	Dunnock (<i>Prunella modularis</i>)	10
		Firecrest (<i>Regulus ignicapilla</i>)	1
		Grey Wagtail (<i>Motacilla cinerea</i>)	6
		Hawfinch (<i>Coccothraustes coccothraustes</i>)	3
		Herring Gull (<i>Larus argentatus</i>)	8
		Hobby (<i>Falco subbuteo</i>)	4
		House Martin (<i>Delichon urbicum</i>)	10
		House Sparrow (<i>Passer domesticus</i>)	22
		Kestrel (<i>Falco tinnunculus</i>)	5
		Lesser Spotted Woodpecker (<i>Dryobates minor</i>)	2

Invertebrate Species Records	Nr
Brindled Beauty (<i>Lycia hirtaria</i>)	9
Brown Hairstreak (<i>Thecla betulae</i>)	17
Buff Ermine (<i>Spilosoma lutea</i>)	10
Centre-barred Sallow (<i>Atethmia centrargo</i>)	3
Cinnabar (<i>Tyria jacobaeae</i>)	7
Deep-brown Dart (<i>Aporophyla lutulenta</i>)	1
Dingy Skipper (<i>Erynnis tages</i>)	2
Dot Moth (<i>Melanchra persicariae</i>)	1
Dusky Thorn (<i>Ennomos fuscantaria</i>)	10
Ear Moth (<i>Amphipoea oculatea</i>)	1
Feathered Gothic (<i>Tholera decimalis</i>)	2
Garden Dart (<i>Euxoa nigricans</i>)	1
Knot Grass (<i>Acronicta rumicis</i>)	6
Lackey (<i>Malacosoma neustria</i>)	4
Latticed Heath (<i>Chiasmia clathrata</i>)	1
Minor Shoulder-knot (<i>Brachylomia viminalis</i>)	1
Mottled Rustic (<i>Caradrina morpheus</i>)	8
Oak Hook-tip (<i>Watsonalla binaria</i>)	11
Oak Lutestring (<i>Cymatophorina diluta</i>)	2
Purple Emperor (<i>Apatura iris</i>)	1
Rosy Minor (<i>Litologia literosa</i>)	1
Rosy Rustic (<i>Hydraecia micacea</i>)	1
Rustic (<i>Hoplodrina blanda</i>)	10
Sallow (<i>Cirrhia icteritia</i>)	3
Shoulder-striped Wainscot (<i>Leucania comma</i>)	3
Small Emerald (<i>Hemistola chrysoprasaria</i>)	3
Small Heath (<i>Coenonympha pamphilus</i>)	3
Small Phoenix (<i>Ecliptopera silaceata</i>)	2
Small Square-spot (<i>Diarsia rubi</i>)	1
Stag Beetle (<i>Lucanus cervus</i>)	1
White Admiral (<i>Limenitis camilla</i>)	3
White Ermine (<i>Spilosoma lubricipeda</i>)	10

Bird Species Records	Nr
Linnet (<i>Linaria cannabina</i>)	1
Mallard (<i>Anas platyrhynchos</i>)	9
Marsh Tit (<i>Poecile palustris</i>)	3
Mistle Thrush (<i>Turdus viscivorus</i>)	4
Nightingale (<i>Luscinia megarhynchos</i>)	10
Red Kite (<i>Milvus milvus</i>)	14
Reed Bunting (<i>Emberiza schoeniclus</i>)	1
Skylark (<i>Alauda arvensis</i>)	2
Song Thrush (<i>Turdus philomelos</i>)	13
Spotted Flycatcher (<i>Muscicapa striata</i>)	1
Starling (<i>Sturnus vulgaris</i>)	12
Stock Dove (<i>Columba oenas</i>)	8
Swift (<i>Apus apus</i>)	12
Tawny Owl (<i>Strix aluco</i>)	23
White-tailed Eagle (<i>Haliaeetus albicilla</i>)	1
Whitethroat (<i>Curruca communis</i>)	5
Willow Warbler (<i>Phylloscopus trochilus</i>)	1
Yellowhammer (<i>Emberiza citrinella</i>)	3

Reptile Species Records	Nr
Grass Snake (<i>Natrix helvetica</i>)	3
Slow-worm (<i>Anguis fragilis</i>)	10

Terrestrial Mammals Records	Nr
Brown Long-eared Bat (<i>Plecotus auritus</i>)	4
Common Pipistrelle (<i>Pipistrellus pipistrellus</i>)	15
Daubenton's Bat (<i>Myotis daubentonii</i>)	1
Natterer's Bat (<i>Myotis nattereri</i>)	1
Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>)	2
Rabbit (<i>Oryctolagus cuniculus</i>)	1
Hazel Dormouse (<i>Muscardinus avellanarius</i>)	10
Hedgehog (<i>Erinaceus europaeus</i>)	44

Habitats and Flora

3.18 Habitats present in the Site at the time of survey are illustrated in **Drawing 1** (TEP Ref G10445.009) and include:

- Modified grassland (g4);
- Artificial unvegetated – unsealed surface (u1c);

- Sparsely vegetated urban land – ruderal/ephemeral (u1f); and
- Developed land; sealed surface (u1b).

3.19 However it should be noted that the baseline habitats used for this EclA are those that were present at the time of the OPA. The site was comprised entirely of Modified grassland as illustrated in Drawing 2 (TEP Ref G10445.014).

Modified grassland [g4]

3.20 Previous Phase 1 habitat survey completed in 2018 to inform the Brookleigh OPA (ES Volume 1 Chapter 6) identified the whole extent of the Site as comprising improved grassland.

3.21 During the 2024 habitat survey, only the southern part of the Site comprised grassland, which was classed as g4 modified grassland using UKHab classification. The grassland remained equivalent to the agriculturally 'improved grassland' recorded from the previous habitat survey using JNCC habitat classification.

3.22 The grassland is managed by routine cutting. The sward height was approximately 0.25m with little variation. Perennial ryegrass was dominant within the sward with Yorkshire fog frequent. Occasional broad-leaved dock, white clover, cock's foot and dandelion were present.



Figure 9: g4 modified grassland

Condition assessment

- 3.23 The grassland sward at TN1 passed BNG condition assessment criteria C; D; E; F and G but failed essential criteria A and criteria B. The grassland was therefore assessed as being in poor condition.

Artificial unvegetated – unsealed surface [u1c]

- 3.24 Although previous survey in 2018 for the Brookleigh development OPA identified the whole site as improved grassland, during the 2024 habitat survey the northern part of the Site (TN2) was in use as a construction compound operated by SISK.
- 3.25 The area contains highly disturbed bare ground, with material storage areas (**Figure 10**). Ephemeral/short perennial vegetation has started to develop in areas.



Figure 10: u1c artificial unvegetated unsealed surface (construction compound)

Condition assessment

- 3.26 The u1c artificial surface failed urban condition assessment criteria A and B but passed criteria C. The u1c artificial surface was assessed as being in poor condition.

Sparsely vegetated urban land, ruderal/ephemeral [u1f]

- 3.27 Previously recorded as improved grassland from the 2018 habitat survey, tall ruderal vegetation had developed within a fenced-off area in the northwest of the site, illustrated at **Figure 11**. The area was assumed to have previously formed part of the current site compound area. Using UKHab classification, the habitat was classified as u1f sparsely vegetated urban land.



Figure 11: u1f artificial unvegetated unsealed surface (construction compound)

- 3.28 Broad-leaved dock, common nettle, spear thistle, creeping thistle, dandelion, sow thistle and colt's foot were frequently recorded, with Yorkshire fog grass also beginning to colonise.

Condition assessment

- 3.29 The ruderal/ephemeral habitat failed urban condition assessment criteria A but passed criteria B and C. The ruderal/ephemeral was assessed as being in moderate condition.
- 3.30 Building and hardstanding / Developed land; sealed surface [u1b]; Condition assessment n/a

Buildings and hardstanding within the temporary SISK compound [u1b]

- 3.31 Within the temporary SISK site compound formed across the northern half of the Site there was a collection of site cabins and temporary hard surfacing put down. These were classed as u1b developed land sealed surface. These were all temporary features.

Condition assessment

- 3.32 Condition assessment for this habitat type is not required.

Habitat Connectivity

- 3.33 The Eastern Adur river corridor parallels the east boundary of the Site and interlinks the Site with nearby woodland copses and the local tree and hedgerow network. These key habitat features are indicated to be preserved within the Green Infrastructure strategy for the Brookleigh development. All are offsite to the Site, the boundary of which contains only grassland to the south and the temporary construction compound in the north.

Fauna

Herptiles (Amphibians and Reptiles)

- 3.34 Thirteen records for GCN and seven records for common toad were returned within 2km of the Site. Records were also provided for common frog and smooth newt. The Site is within the wider natural range of these species. Previous eDNA surveys completed in 2018 did not confirm presence of GCN within influence of the Site. Updated eDNA surveys in 2021 confirmed presence of GCN in 'pond 7' located approximately 510m northeast of the Site, with all other ponds surveyed returning negative eDNA results. The Eastern Adur was previously assessed to be highly sedimented with limited flows and may therefore not present a significant barrier to amphibian movements.
- 3.35 While GCN are able to travel distances in excess of 500m from ponds, terrestrial densities at these distances would be very low except in the presence of high quality overwintering habitat, for example. Given the nature of habitats recorded within the Site and distribution of ponds locally, GCN are therefore considered to be absent from the Site, although common amphibian species could be present terrestrially.
- 3.36 Records for grass snake and slow worm were returned within 2km of the site. The Site is within the wider natural range of these species. Previous surveys undertaken in 2018 to inform the Brookleigh OPA identified low populations of grass snake and slow worm within the woodland and riparian habitats located approximately 125m to the east of the Site.
- 3.37 The modified grassland within the Site represents potential herptile foraging and ranging habitat, although the low species diversity means this habitat is considered sub-optimal. The habitats within the compound area in the northern part of the Site, comprising temporary buildings, hardstanding, bare ground and ruderal/ephemeral, currently provide limited potential foraging or ranging opportunities for herptiles.
- 3.38 The hedgerow and woodland habitats outside of the Site to the south, east and west represent more structurally diverse and optimal habitats for reptiles, particularly for winter refuge but hedgerows may also offer dispersal, shelter and forage opportunities depending on adjacent habitat.

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3.40

Bats

- 3.41 Records for brown long-eared, common pipistrelle, Daubenton's, Natterer's and soprano pipistrelle bats were returned within 2km of the Site. Previous surveys undertaken to inform the Brookleigh OPA identified limited foraging and commuting activity by common pipistrelle and soprano pipistrelle bats in the vicinity of the Site. A single pass by serotine and two passes by brown long-eared bat were recorded. Later surveys in 2021 confirmed at least nine species of bat using the local landscape of hedgerows and woodland edges, including the three pipistrelle species, Myotis species, noctule, Leisler's bat, serotine, brown long-eared bat and barbastelle. The latter species, barbastelle, was recorded only on one occasion in July 2021 on a flight line linking with offsite ancient woodland at a location in excess of 500m east of the Site.
- 3.42 Comprising uniform modified grassland and an active, if temporary, site compound, the habitats within the Site offer low potential (Collins 2023) for commuting and foraging bats. Potential roost habitat is absent.
- 3.43 Hedgerow and woodland habitats around the Site and offsite to the south, east and west represent more structurally diverse and optimal commuting and foraging habitat for bats, with mature trees representing potential bat roost habitat. The Easter Adur river corridor to the east of the would provide highest function for locally commuting and foraging bats.

Birds

- 3.44 A range of bird records were provided within 2km of the Site, as summarised at **Table 5**. Surveys undertaken to inform the Brookleigh OPA identified breeding territories of dunnock and song thrush in the vicinity of the Site.
- 3.45 The modified grassland within the southern part of the Site offers foraging potential for a limited range of ground-feeding widespread species. The grassland within the Site is limited in extent and the low species diversity in-combination with proximity to the temporary site compound lowers the suitability of this area for foraging birds. The habitat does not offer potential for ground nesting birds due to relative enclosure by offsite trees and woodland edge and the proximity of the temporary site compound in the northern half of the Site.
- 3.46 The temporary site compound in the northern part of the Sites provides negligible nesting opportunities for birds due to the high levels of disturbance.
- 3.47 The hedgerow and woodland habitats outside of the Site to the south, east and west represent more structurally diverse and optimal habitats for nesting and foraging birds. The Green Infrastructure strategy for the Brookleigh development indicates the majority of suitable habitat offsite (hedgerows and woodlands) is to be retained.

Hazel Dormouse

- 3.48 Ten records for hazel dormouse were returned within 2km of the Site. Surveys undertaken to inform the Brookleigh OPA identified dormouse nests within the woodland approximately 100m to the east of the site. This woodland habitat is connected to the hedgerow habitat adjacent to the Site. Previous surveys completed in 2021 to inform the Phase 1B RMA confirmed presence of hazel dormouse in two substantial hedgerows, one located approximately 240m north of the Site and the other more distant linking Big Wood and Watford Wood further east.
- 3.49 Hazel dormouse presence is presumed in all suitable habitat (hedgerow, scrub and woodland) connected to areas with confirmed presence. No such suitable habitat is present within the Site.

Hedgehog

- 3.50 Forty-four records for hedgehog were returned within 2km of the Site. The grassland within the southern part of the Site and the offsite hedges and woodland to the south, east and west provide suitable habitats for hedgehogs. The grassland within the Site offers only foraging opportunities and this is of limited extent given the relatively small area of the Site overall (notwithstanding the formation of the temporary site compound within the northern half of the Site).

Invertebrates

- 3.51 Records for 36 invertebrate species were returned within 2km of the Site, predominately butterfly and moth species.
- 3.52 The grassland in the southern half of the Site offers low quality habitat for invertebrates. It low floristic and structural diversity and its regular maintenance mean the grassland would not provide specialist food plants for many species adult or larval butterflies or moths, and would not offer larval or overwintering shelter opportunities. The temporary site compound provides negligible opportunities for invertebrates.
- 3.53 Invertebrates are therefore not taken forward for further assessment as a valued ecological feature. Opportunities for enhancement, while limited within the proposals for are considered in Section 5.0.

Otter and Water Vole

- 3.54 There are no suitable habitats for otter or water vole within the Site. The Eastern Adur river corridor is sufficiently distant to the west that indirect adverse effects are unlikely.
- 3.55 Otters and water voles are therefore are therefore not taken forward for further assessment as valued ecological features. Considering lack of suitable habitat present, opportunities for enhancement within the not practical and are not discussed further in this EcIA.

4.0 Assessment of Potential Impacts

- 4.1 This section assesses the potential impacts of the development proposals illustrated at Figure 3 on ecological features associated with the Site described in Section 3.0.
- 4.2 Consideration is given to the 'mitigation hierarchy', i.e. that impacts are first avoided or where this is not practicable, mitigated and as a final resort, compensated (off-set).

Wildlife Sites

- 4.3 Ditchling Common SSSI is located over 2km southeast of the Site. Given this distance and the IRZ parameters, there are no anticipated ecological impact pathways that would give rise to adverse ecological effects upon the SSSI during construction or operation of the Site.
- 4.4 Bedelands LWS and Great Wood & Copyhold Hanger LWS are located approximately 600m to the east and north respectively. Other LWS identified from the desk study are at further distance from the Site. No direct impacts would arise on any of the LWS during construction or operation of the Site. All LWS are sufficiently distant from the Site that indirect effects from dust (during construction) or emissions (during operation), light or noise disturbance (during construction or operation) or other indirect ecological effects would be avoided.
- 4.5 Ecological impacts upon designated wildlife sites during and post-construction are considered to be **negligible**.

Habitat Network

- 4.6 No loss of hedgerow or woodland habitat will be required to facilitate the development. While loss of the modified grassland would result, development of the proposed primary school would deliver green infrastructure of comparable ecological function within the local and wider habitat network.
- 4.7 Ecological effects upon the local habitat network are therefore anticipated to be negligible.

Habitats and Flora

- 4.8 Modified grassland, which has limited intrinsic ecological value, would be replaced by grassland sward of near equivalent function within the green infrastructure of the proposed primary school. Although there will be a reduction in the quantum of grassland within the site, with grassland in the north of the site being replaced by buildings and hardstanding associated with the Primary School, the inclusion of tree planting and creation of areas of Other neutral grassland and Introduced shrub within the landscaping proposal will create greater botanical and structural diversity within the site.

- 4.9 No direct impacts on offsite deciduous woodlands are anticipated and no indirect or direct effects on hedgerows are anticipated. No hedgerow removal is required to facilitate site access.
- 4.10 There is the potential for accidental damage of hedgerows during the construction period, where an offsite hedgerow is present adjacent to the southern part of the site. In the absence of mitigation, this would be a temporary negative ecological effect at the site level.

Fauna

Herptiles (Amphibians and Reptiles)

- 4.11 GCN and their habitats are fully protected under the Habitats Regulations and the Wildlife & Countryside Act 1981 (as amended). GCN and common toad are also SPI.
- 4.12 GCN are considered unlikely to be present. The site offers limited suitability for foraging and ranging amphibians which might be present in low densities, but no shelter or potential hibernation habitat is present. Common amphibian species are considered to be a feature of importance at the site level. The Site provides low value ecological function for the local amphibian population.
- 4.13 Common lizard, slow-worm, grass snake and adder are protected under the Wildlife and Countryside Act 1981 (as amended) from killing and injury and are all.
- 4.14 Low populations of grass snake and slow worm are present within the wider area. The local reptile population is of Local conservation importance. However the site offers limited suitability for foraging and ranging reptiles which might be present in low densities, but no shelter or potential hibernation habitat is present. The Site therefore provides low value ecological function for the local reptile population.
- 4.15 Loss of the modified grassland habitat within the site is considered unlikely to have a significant impact on the local herptile population. Clearance of grassland habitat within the Site poses a limited risk of killing or injury to herptiles should they be present within the site during clearance. Exposure to open excavations or stored materials may however present risk of killing or injury to herptiles, should they be able to gain access to such features overnight.
- 4.16 In the absence of mitigation, there would be a **permanent negative ecological effect** upon herptiles, significant at the **site level**.

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Bats

- 4.22 All British bats are European protected species, afforded full protection under the Habitats Regulations and the Wildlife & Countryside Act 1981 (as amended). Bats are protected from killing or injury, and from disturbance at the place of rest. Bat roosts are also protected from obstruction, damage or destruction (whether or not a bat is in occupation at the time). Soprano pipistrelle, noctule, brown long-eared and barbastelle bat species are also SPI.
- 4.23 The bat population locally is considered to be of Regional conservation importance. As the Site offers no roosting habitat, low quality foraging habitat and only indirectly supports offsite commuting or dispersal habitats, the Site would not functionally support any aspect of the local bat assemblage for part of a year or through a year in isolation. The Site therefore provides low value ecological function for the local bat assemblage.
- 4.24 Loss of habitats within the Site during the construction phase would not have a significant impact on local bat populations, provided key foraging and commuting routes around the Site are maintained as indicated by the Green Infrastructure strategy for the wider Brookleigh development.

- 4.25 The anticipated local increase in artificial lighting during and post-construction of the new primary school will require a sensitive lighting scheme to avoid wider habitat fragmentation for local bat populations.
- 4.26 In the absence of mitigation, there would be a **temporary reversible negative ecological effect** upon bats, significant at the **local level**.

Birds

- 4.27 Native nesting birds, their nests and eggs are protected under the Wildlife & Countryside Act 1981 (as amended) from damage and destruction, from the time of nest construction to fledging of the young.
- 4.28 The Site provides low value ecological function for local bird populations. There are no habitats suitable for nesting birds within the Site. There was no scrub, tree or hedgerow habitat present to provide nest opportunities for passerine species and the active construction compound to the north in combination with relative enclosure by surrounding hedgerows and woodland would limit suitable opportunities for ground nesting species.
- 4.29 Clearance of habitats within the site is unlikely to have a direct impact on nesting birds or a significant impact on foraging birds. However clearance and construction during the construction phase would cause noise or visual disturbance to nesting birds within adjacent habitats which would result in temporary exclusion of birds from the site area.
- 4.30 The introduction of new artificial lighting could disrupt breeding or foraging patterns of birds within or immediately surrounding the Site during operation.
- 4.31 Overall, in the absence of mitigation, there would be a **temporary reversible negative ecological effect** upon the local bird assemblage, significant at the **site level**.

Hazel Dormouse

- 4.32 Dormice and their habitats are protected under the Habitats Regulations and the Wildlife & Countryside Act 1981 (as amended). The dormouse is also a SPI.
- 4.33 The landscape around the Site is considered to be of local ecological value for hazel dormouse. However, the Site in isolation provides negligible ecological function for hazel dormouse.
- 4.34 No hedgerow removal will be required to accommodate site access. No tree, hedgerow or woodland removal or other form of tree works is anticipated to be required to facilitate development of the Site.
- 4.35 Hazel dormouse are nocturnal animals and the introduction of new artificial lighting could result in disturbance of hazel dormouse, the fragmentation of foraging or shelter habitats,

and higher vulnerability to predation. The anticipated local increase in artificial lighting during and post-construction of the new primary school will require a sensitive lighting scheme to avoid adverse effects upon hazel dormouse.

- 4.36 In the absence of mitigation, there would be a **temporary reversible negative ecological effect** upon the hazel dormouse population, significant at the **site level**.

Hedgehogs

- 4.37 Hedgehog is listed on Schedule 6 of the Wildlife and Countryside Act (1981) which makes it illegal to kill or capture wild hedgehogs, with certain methods listed. They are also listed under the Wild Mammals Protection Act (1996), which prohibits cruel treatment of hedgehogs. The hedgehog is also an SPI.
- 4.38 Loss of grassland would result in loss of foraging habitat for hedgehogs locally. However, proposals include creation of grassland that would offer similar function within similar range.
- 4.39 Clearance of grassland habitat within the Site is unlikely to pose a risk of killing or injury to hedgehogs given their nocturnal behaviour. Exposure to open excavations or stored materials may however present risk of killing or injury to hedgehogs should they be able to gain access to such features overnight.
- 4.40 In the absence of mitigation, there would be a **permanent negative ecological effect** upon hedgehogs, significant at the **site level**.

5.0 Mitigation and Enhancement

- 5.1 This section describes appropriate and proportionate measures for impact avoidance, mitigation and enhancement required or recommended to address the potential ecological effects described in Section 4.0.

Habitats and Flora

Onsite Habitats

- 5.2 Loss of the modified grassland will be offset in part by the creation of new amenity grassland swards and small areas of meadow or wildflower planting areas.
- 5.3 Landscaping opportunities are otherwise limited within the Site due to required land use. Proposed tree planting within the southern and western areas of the site, around the largest of the grassland areas, will buffer and enhance the retained hedgerow and tree habitat adjacent to the site.
- 5.4 Landscape planting should utilise native, wildlife friendly species.
- 5.5 The OPA BNG assessment for this plot calculated a net loss of 2.10 habitat units (-43.4%) in-isolation. The Design Stage BNG assessment recalculates a net gain of 0.09 habitat units, representing a gain of 1.98%. This represents a betterment in the detailed design equivalent to 1.62 habitat units and therefore the proposals for the Site are considered to conform with the BNG requirements for the Brookleigh BNG development. Development of the Site will therefore indirectly contribute to the biodiversity net gains of the Brookleigh development as a whole.

Offsite Habitats

- 5.6 Protective fencing must be installed to prevent the contractor straying into retained areas of habitat outside of the site boundary. Appropriate root protection areas for trees off site which may be impacted must be defined by a suitably qualified arboriculturist, and protective fencing must be set out and approved. This must be detailed in a Construction Environmental Management Plan (CEMP) in accordance with BS42020-2013, prior to the start of works and signed off by a suitably qualified ecologist or arborist.
- 5.7 Standard pollution prevention and dust control measures should be set out in the CEMP and implemented during site clearance and construction works. The CEMP will identify measures to ensure the potential for indirect impacts on retained habitats adjacent to the site are mitigated for.

Fauna

- 5.8 Prior to start of works a Precautionary Working Method Statement (PWMS) should be produced detailing the precautionary methods needed for clearing habitat that could harbour wildlife species including amphibians, reptiles, [REDACTED] nesting birds or hedgehogs. Principally, the PWMS will include:
- Employment of an Ecological Clerk of Works for the construction phase (including pre-construction enabling works);
 - Presentation of a Toolbox Talk to communicate key ecological issues, avoidance and mitigation requirements;
 - Clearance of the grassland applying a two-phase approach, with the first phase being a cut to no less than 150mm above ground level and the second phase being a cut to ground level no less than 24hours and no more than 48hours after the first cut. The cut will be completed in a methodical manner, from one side of the field to the other (west to east or, less preferably, north to south) to move any wildlife to safe undisturbed habitat offsite) and the ECOW will inspect the site prior to both cuts;
 - Should any wildlife be discovered during the construction activities, that would be at risk by those activities, works should cease immediately, and the advice of the ECOW should be sought - works should then proceed in accordance with the advice;
 - Any excavations overnight should be covered or provided with ramps and any open pipework should be capped off to prevent wildlife entrapment;
 - Building materials and waste should be stored appropriately to discourage wildlife from using them as shelter.

Amphibians and Reptiles

Further Surveys

- 5.9 Given the lack of confirmed breeding habitat on or within 500m of the Site and the limited suitable terrestrial habitat within the Site for amphibians, further survey to inform impact assessment or recommendations for mitigation is not required. Similarly, given the known occurrence of reptiles slow worm and grass snake locally and the limited extent of suitable habitat for these reptiles within the Site, further survey is not required.

Avoidance and Mitigation Required

- 5.10 No additional avoidance or mitigation measures are anticipated to be required, beyond those measures included within the PWMS.

Enhancement

- 5.11 Enhancement measures for herptiles that could readily be delivered within the proposed development include:
- Use of arisings from grass cuts and tree or shrub pruning to create a compost pile that is accessible to herptiles (particularly grass snakes for egg laying;
 - Creation of a hibernacula within undisturbed shaded or partially shaded areas along the east or south edges of the proposed development. These could take the form of log piles and brash piles to create shelter opportunities for wildlife; and
 - Establishment of permanent grass buffer strips (minimum 1m up to 2m or more wide) to allow tall grass to establish adjacent to shrub, scrub and woodland edges to create foraging and shelter areas for herptiles and other wildlife (hedgehogs and invertebrates, for example, and to improve foraging for birds and bats).

Further Surveys

5.12

5.13

5.14

Enhancement

- 5.15 No enhancement is considered practical or necessary within the proposed development.

Bats

Further Surveys

- 5.16 Further bat surveys are not required due to the small scale of the proposals, sub-optimal nature of the habitats to be impacted. Furthermore, habitats of the highest value to bats for foraging and commuting and, potentially, for roosting are offsite adjacent to the Site and will be retained and protected as part of the wider Brookleigh development Green Infrastructure Strategy.

Avoidance and Mitigation Required

- 5.17 A Sensitive Lighting Strategy will be needed to avoid impacts on foraging and commuting habitat adjacent to the site from an increase in artificial lighting. Dark edges should be maintained by avoiding light spill and glare into the south and west boundaries of the Site in particular, although sensitive lighting design should be considered site-wide to avoid indirect disturbance to light-sensitive wildlife in the local environs.
- 5.18 Applying a Sensitive Lighting Strategy, all new artificial lighting at night within the development should be designed in line with the Institution of Lighting Professionals Guidance Note 08/23 Bats and Artificial Lighting in the UK¹⁸. There are four key lighting design principles:
- Spatial spread of lighting – the horizontal and vertical spread of artificial light will be minimised and will take into account both primary and reflected light sources;
 - Directional lighting should be designed into the luminaire and specifically angle and orientation of beam – while mitigation can be achieved by use of a retro-fitted cowl, louvre or other light shield, or a combination of these, these latter measures are considered ‘last resort’ only where integral design measures remain insufficient to adequately mitigate impacts;
 - Timing and duration of lighting – timers and bespoke dimming regimes may be used to ensure that luminaires are reduced at times of predicted low use. These can be set to change with the seasons and therefore reflect the shifting time of dusk and dawn throughout the year. Motion sensors provide further control to ensure that areas are illuminated only when required. Use of motion sensors and timers are recommended in the event that lighting on elevations facing the east or south boundaries cannot be avoided.
 - Intensity and colour of lighting – light intensity will be as low as possible whilst meeting the objectives of the intended function. Light sources selected should emit zero ultraviolet light. Guidance Note 08/23 recommends that white and blue spectrum light should be avoided or, where white lights are required, these should be of warm/neutral colour (below 3000K, preferably 2700K) and have a peak wavelength above 550 nanometres. Narrow spectrum light sources should be used (to lower the range of species affected by lighting).
- 5.19 Boundary treatments and landscape design should provide additional lighting mitigation along the west and south boundaries. The additional tree planting on these boundaries will provide some additional screening function once established.

¹⁸ Bat Conservation Trust and Institute of Lighting Professionals (2023) Guidance Note 08/23: Bats and artificial lighting in the UK. ILP, Rugby

Enhancement

- 5.20 Proposed tree planting within the southern and western parts of the site will buffer and enhance the retained hedgerow and tree habitat adjacent to the site, enhancing the commuting and foraging corridor to the west of the site.
- 5.21 To enhance bat roosting availability within the site, it is recommended that built in bat boxes are incorporated into the school building design.

Birds

Further Surveys

- 5.22 No further surveys are required given the lack of suitable habitats for nesting birds within the Site.

Avoidance and Mitigation Required

- 5.23 Clearance of suitable nesting habitat i.e., structurally diverse vegetation, including longer grassland, during the nesting season (typically recognised as March to September) should be avoided where possible. If this is not possible, then prior to the start of works a PWMS should be produced detailing the following measures:
- A suitably qualified ecologist must carry out a nesting bird check prior to any works to clear or disturb suitable habitats during the nesting season.
 - Should an active nest be identified, the ecologist will set up an appropriate buffer zone (minimum of five metres dependant on species and location) inside which no works can take place until the young birds have fledged and the nest has been abandoned.
 - Repeat nesting bird checks by a suitably qualified ecologist may be necessary to ascertain if the young birds have fledged.
- 5.24 The Sensitive Lighting Scheme described at paragraph 5.18 will be sufficient to avoid disturbance of birds and to prevent habitat degradation or fragmentation as a consequence of new artificial lighting during the operational phase.

Enhancement

- 5.25 Proposed tree planting within the southern and western parts of the site will provide enhanced bird nesting habitat in the medium to long-term.
- 5.26 To enhance bird nesting availability within the site further, it is recommended that built in bird boxes are incorporated into the school building design.

Hazel Dormouse

Further Surveys

- 5.27 No surveys for hazel dormouse are required, as there no suitable habitat within the Site.

Avoidance and Mitigation Required

- 5.28 Protection of offsite habitats described at paragraphs 5.6-5.7, in-combination with the Sensitive Lighting Scheme described at paragraph 5.18 will be sufficient to avoid disturbance of hazel dormice and to prevent habitat degradation or fragmentation.

Enhancement

- 5.29 No enhancement is considered practical or necessary within the proposed development.

Hedgehog

Avoidance and Mitigation Required

- 5.30 The PWMS measures implemented for herptiles will also ensure the avoidance of killing or injury to individual hedgehogs that might be present within the site. Any hedgehogs encountered should be relocated to a safe area outside the working footprint.

Enhancement

- 5.31 Hedgehog hibernacula should be incorporated in the south of the Site. Similar to creation of a hibernaculum for herptiles, this could take the form of the creation of log piles and brash piles to provide increased refuge opportunities for a range of wildlife, including hedgehog.

Invertebrates

Avoidance and Mitigation Required

- 5.32 Although not identified as a valued ecological feature, the Sensitive Lighting Scheme described at paragraph 5.18 will also be of benefit to invertebrates within or adjacent to the Site (many of which are light-sensitive at some point or throughout their life-cycles).

Enhancement

- 5.33 Opportunities to incorporate a bug hotel to the south of the site should be explored.

6.0 Conclusions

Ecological Features

- 6.1 The Site was assessed to be of low ecological value. It contained no HPI and comprised only a regularly maintained species poor uniform sward of modified grassland in the southern half and the temporary site compound (comprising bare ground, ruderal/ephemeral vegetation and site cabins) in the northern half.
- 6.2 The grassland, which covered the whole of the site at the OPA stage, provides low value (either in terms of quality and/or extent) for terrestrial amphibians, reptiles, [REDACTED] foraging bats, ground-foraging birds, and hedgehog.

Ecological Impacts

- 6.3 Construction phase effects are limited to risk of killing or injury during construction (as a result of entrapment) or temporary reversible disturbance. Construction phase effects are of site level significance.
- 6.4 Operational phase effects are limited to temporary reversible disturbance (habitat fragmentation or species exclusion) which are temporary reversible and of site level significance.

Avoidance and mitigation

- 6.5 Primary avoidance and mitigation measures will be delivered through the production and implementation of a construction phase Ecological Precautionary Working Method Statement and an operational phase Sensitive Lighting Scheme.

Residual Ecological Effects

- 6.6 Upon successful implementation of the avoidance and mitigation measures described in Section 5.0, the proposed development of Site would have a neutral residual impact upon the ecological features present.

Biodiversity Net Gain

- 6.7 A Biodiversity Net Gain assessment was completed for the proposed development at the Site, applying the Defra Metric V2.0 which conforms to the BNG assessment calculated for the OPA. The Design Stage BNG assessment recalculates a net gain of 0.09 habitat units, representing a gain of 1.98%. This represents a betterment in the detailed design equivalent to 1.62 habitat units and therefore the proposals for the Site are considered to conform with the BNG requirements for the Brookleigh BNG development and contribute to the site-wide biodiversity net gains to be delivered by the Brookleigh development.

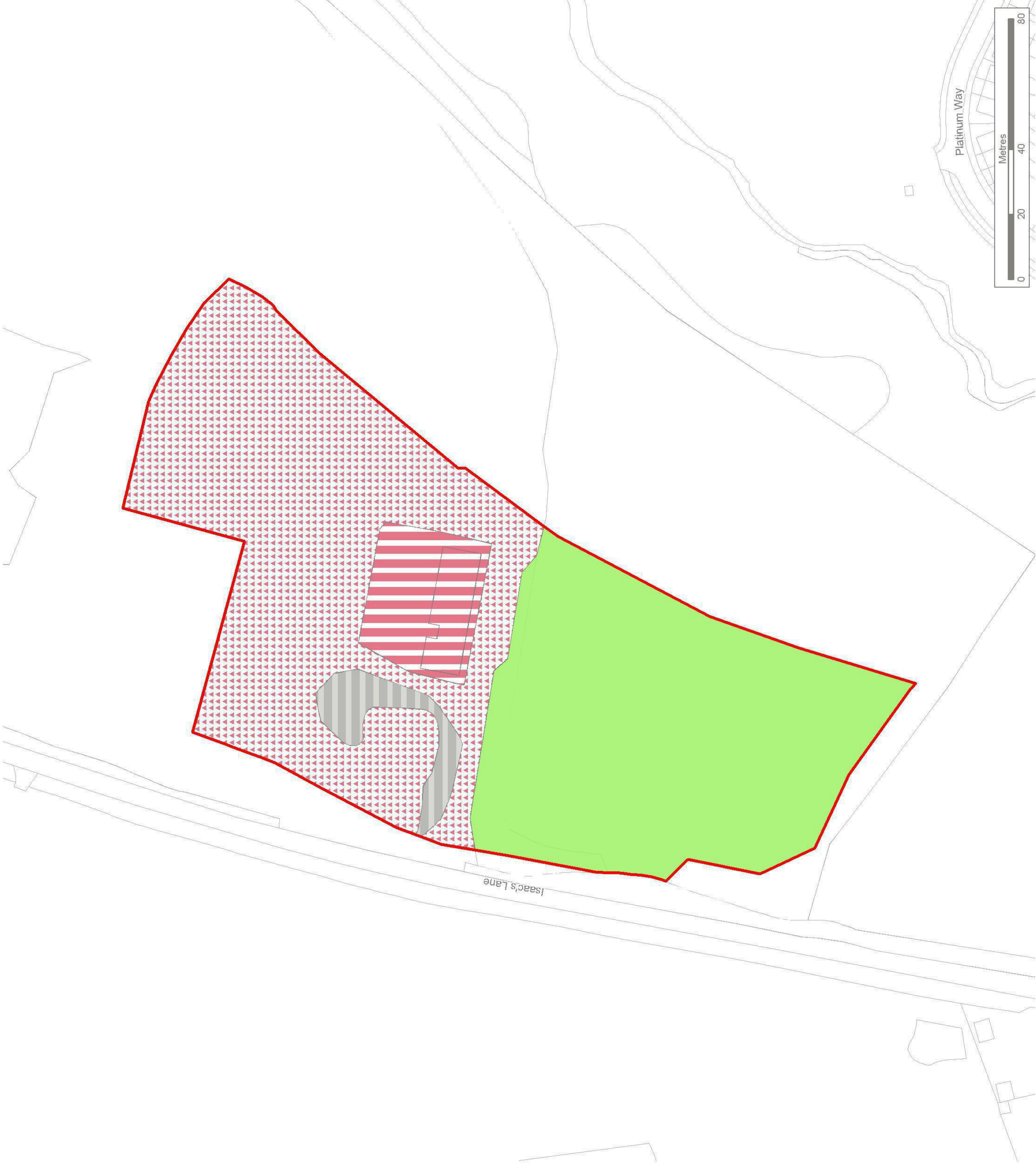
Statement of EIA Conformity

- 6.8 This EclA was undertaken to support of a RMA to be submitted by Homes England to Mid Sussex District Council for the development of the Site within Phase 1 of the Brookleigh development. The OPA was subject to EIA, which was reported in the ES (2018) and an ES Addendum (2019).
- 6.9 The proposed development of the Site is for a primary school, as identified on the Masterplan for the Brookleigh development (**Figure 2**). Ecological surveys and assessment have been completed for the detailed design of the proposed development. The proposed development will safeguard valued ecological features to be retained offsite and will conform with the Brookleigh development BNG net gain targets. Avoidance and mitigation measures and delivery of post-development habitats will be controlled through relevant planning conditions.

Drawings

Drawing 1: Habitat Survey – Current Site Conditions (TEP Ref G10445.001)

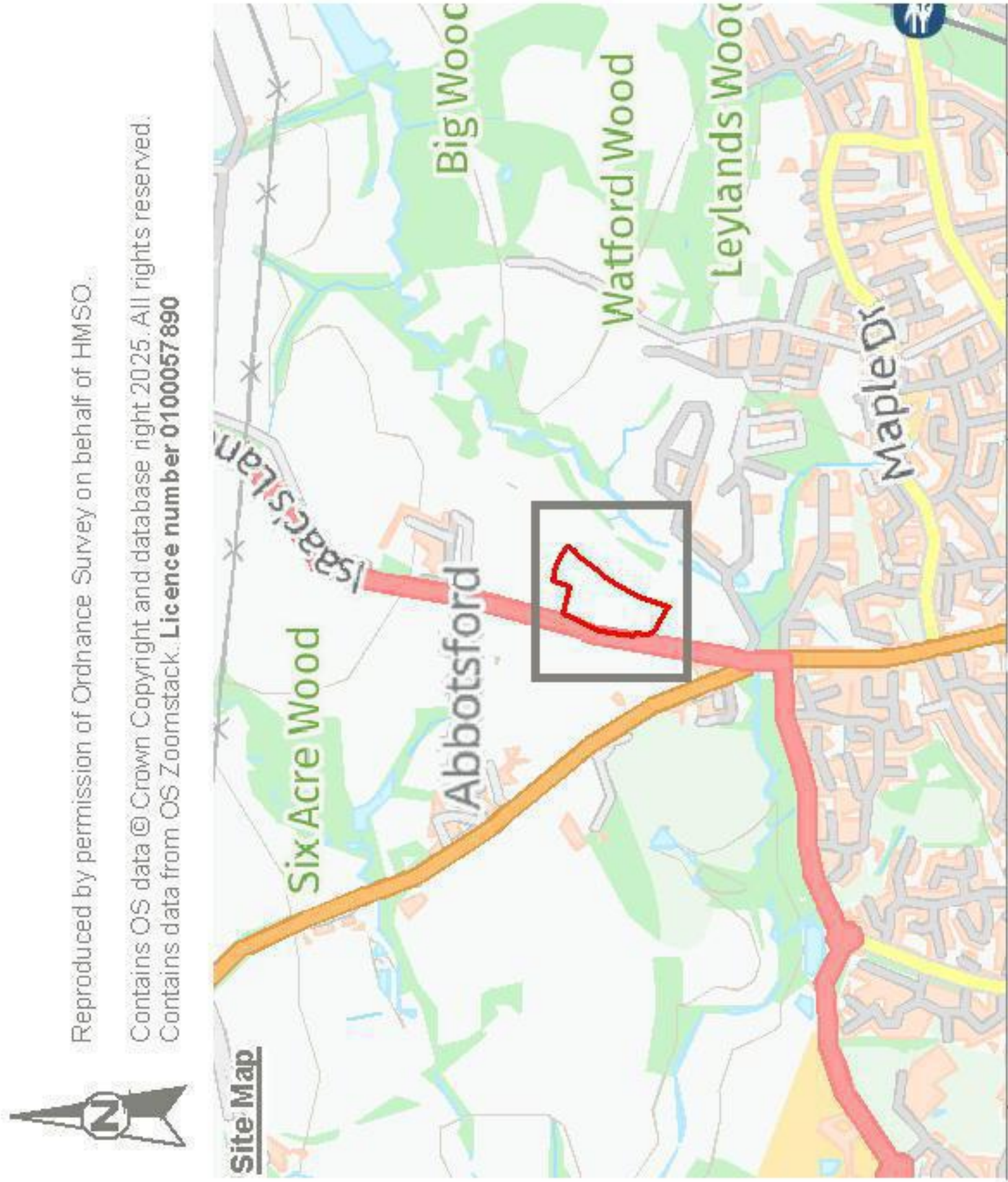
Drawing 2: Habitat Survey – OPA Site Conditions (TEP Ref G10445.014)



KEY

- Site boundary
- Modified grassland
- Tall forbs
- Bare ground
- Developed land, sealed surface

Note:
The locations of habitats and habitat features are indicative.



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Rev	Description	Drawn	Approved	Date



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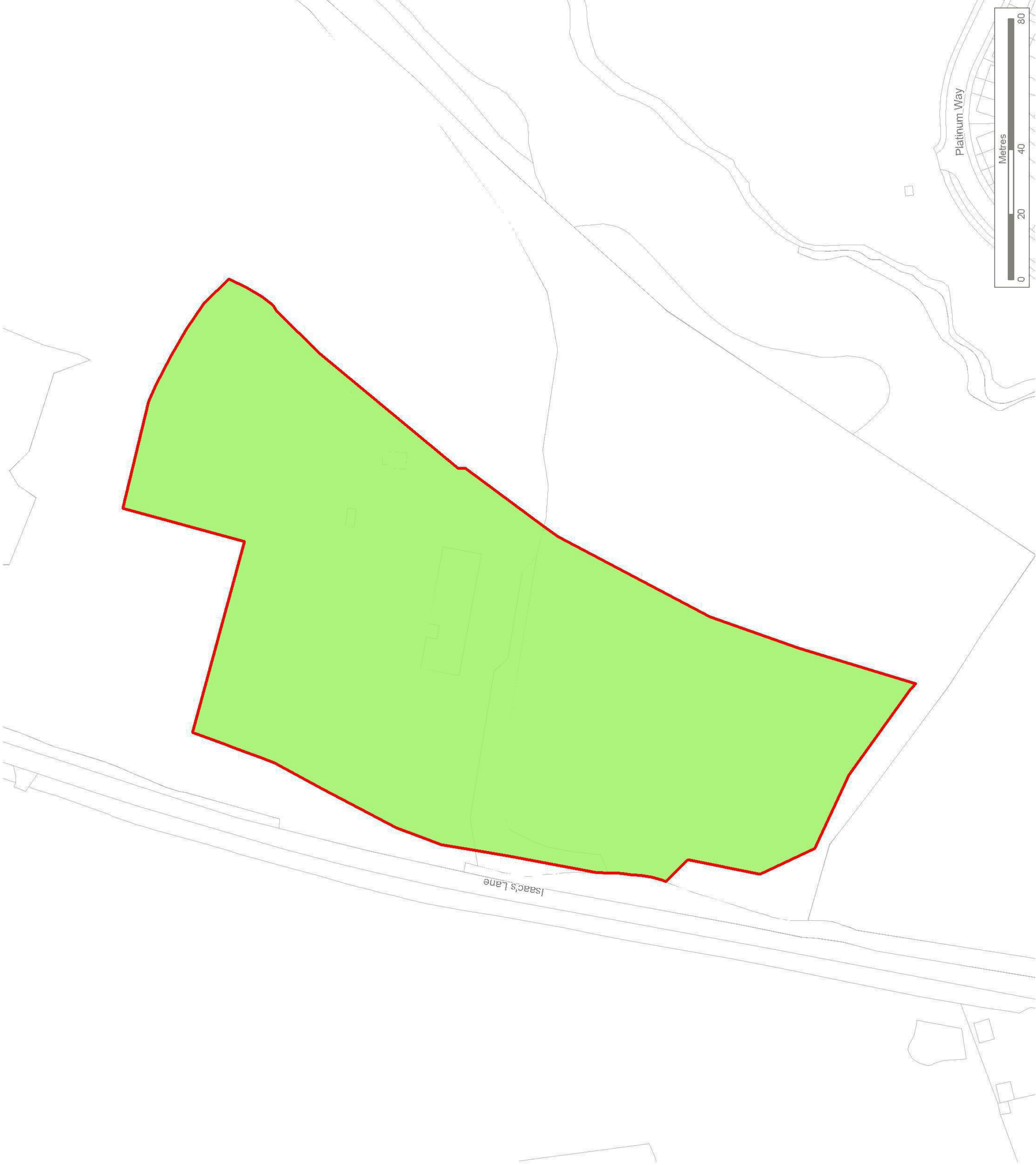
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Project
Brookleigh Primary School

Title
Current Habitats

Drawing Number
G10445.009

Drawn	Checked	Approved	Scale	Date
OH	BJ	AN	1:1,200 @ A3	17/09/2025

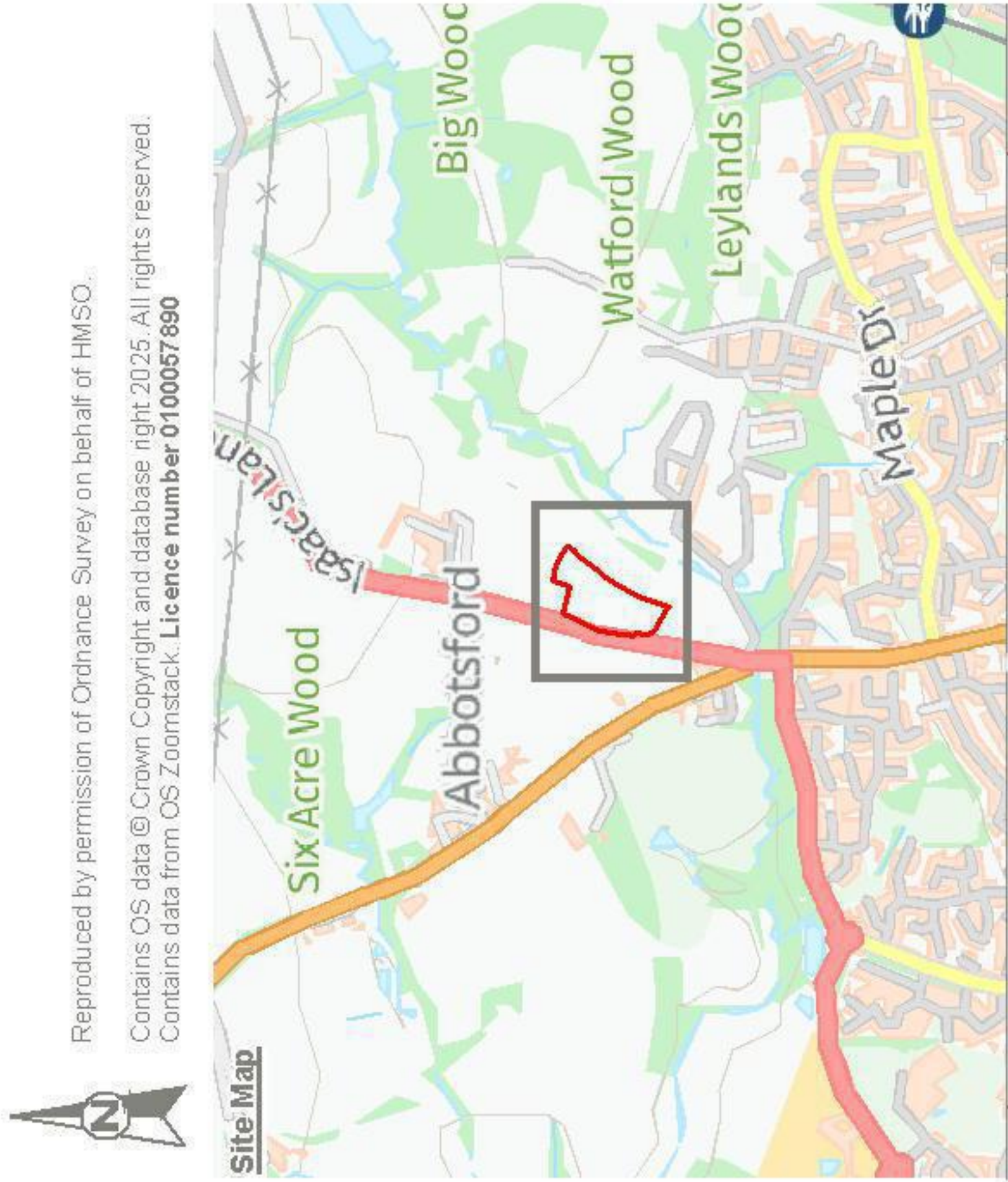


KEY

Site boundary

Modified grassland

Note:
The locations of habitats and habitat features are indicative.



Rev	Description	Drawn	Approved	Date

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Project
Brookleigh Primary School

Title
Baseline Habitats
Outline Planning Application

Drawing Number
G10445.014

Drawn	Checked	Approved	Scale	Date
OH	BJ	AN	1:1,200 @ A3	17/09/2025

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