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3rd December 2025

R.e. Land Adjacent Either Side of Batchelors Farm

Dear Sir/Madam,

This letter provides a response and additional information, where necessary, to comments from Place Services at Essex County Council, dated 14th November 2025 concerning a proposed development at Land adjacent either side of Batchelors Farm, Keymer Road, Burgess Hill, West Sussex (DM/25/2634). A detailed reptile mitigation strategy can be provided as a condition of the approved development.

The comments are detailed below in italics, followed by a response.

“Protected Species – Reptiles

We understand from Section 5.8.2 of the Ecological Impact Assessment (The Ecology Co-op, March 2025) that there is there is a good population of Slow Worm and a low population of Common Lizard on site. Therefore, we support the implementation of a reptile mitigation strategy, which may include the off-site translocation of reptiles to a location within Mid Sussex golf course, Pyecombe golf course or Plumpton College.

If translocation of reptiles to an off-site receptor site is required, we highlight that Government Standing Advice says:

- If translocating reptiles, the proposal needs a receptor site:*
- close to the development site, and within the same LPA if possible*
- that is at least the same size as the habitat that will be lost, and larger if the lost habitat is of high quality*
- that will serve the same function as the habitat to be lost, for example it has hibernation features*
- with similar habitat to the area that will be lost, including water bodies*
- that does not currently support the same species, but can be improved to make it suitable*
- that will be safe from future development and managed in the long term*

This means that the receptor site must be identified and assessed to ensure it meets these requirements and it has sufficient carrying capacity for the translocated reptile populations. We recommend that the assessment is submitted to the LPA prior to determination.

The outline reptile mitigation strategy, including the translocation details, is required prior to determination because paragraph 99 of the ODPM Circular 06/2005 highlights that: “It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.”

Proposed Receptor Site – Pyecombe Golf Course

Pyecombe Golf Course have confirmed an interest in providing a reptile receptor site for slow worms *Anguis fragilis* and common lizards *Zootoca vivipara* translocated from Batchelors Farm. Pyecombe golf course is

happy to finalise details once planning has been approved.

The golf course is located within the South Downs National Park and measures approximately 97 hectares (ha) and is shown in Appendix 1, Figure 1. The golf course is situated approximately 4.8km southwest of the Batchelors Farm development site.

The course supports a mosaic of habitats from tightly-mown fairways, to rough grassland as well as areas of scrub, semi-mature woodland and mature woodland.

There are currently areas of scrub within the golf course that have become too dense restricting light into these areas and making them almost inaccessible.

As a result of the mosaic of habitats and the green keeping practices having an environmental ethos the golf course is a haven for wildflower and wildlife, noted in particular through their diverse butterfly records. It can also be assumed that the golf course is likely to support common species of reptiles including slow worm and common lizard.

Reptiles present within the golf course would also be able to spread out into the wider landscape with Ditchling Beacon just over 1km to the east.

The area of suitable habitat for reptiles being lost from the Batchelors Farm development measures approximately 0.3ha of other neutral grassland.

As part of the mitigation strategy to use Pyecombe golf course as a receptor site for reptiles translocated from Batchelors Farm development, the carrying capacity of Pyecombe Golf Course for reptiles would need to be increased.

This would be achieved through the removal of an area of dense scrub measuring approximately 0.5ha (Figure 2) to convert it into an area of open grassland to be managed in the same way as all of the other existing areas of grassland on the golf course which is a cut and collect practice undertaken by a local farmer (Figure 3). Five hibernacula made using deadwood and brash from the felled scrub would be created at the southern edge of the new grassland area adjacent to the remaining dense scrub present on the golf course to provide additional areas for shelter. Reptiles translocated to the golf course would be released into these hibernacula.

Reptile fencing at Batchelors Farm

The proposed construction zone at Batchelors Farm will be secured with semi-permanent reptile-proof fencing, to a depth of at least 20cm, with stakes located every two metres.

The fencing will form a continuous line to separate the construction site from all adjacent suitable habitats for the duration of the construction period. It will be removed post-construction when all work deemed a risk to reptiles has been completed. A panel will be cut into the fence to allow for vehicle access into and out of the site and the panel must be taped up at the end of each day to prevent reptiles from entering the site.

With the exception of an area in the northwest corner, the entire site will be impacted by the proposed construction works. The approximate proposed route for the fencing around the site is shown in Figure 4. The reptile fence line would need to cut through bramble scrub in several areas which would be covered under a separate dormouse European Protected Species Licence to ensure that the whole proposed construction zone is included within the fence line, preventing reptiles from entering the construction zone at any point.

The installation of the fencing would need to be overseen by an ecologist, with a hand search conducted of the fencing construction line ahead of a trencher or small excavator digging the trench for the installation of

the fence. The fence will be installed outside of the reptile hibernation period (generally avoiding October to late February dependent of weather conditions) to minimise the risk of killing or injury of reptiles during the fence installation.

Reptile translocation at Batchelors Farm

A total of 70 translocation visits will be made between mid-March and October based on a good population of slow worms being identified at Batchelors Farm. Reptile refugia (which can be bitumen and or corrugated metal sheets) will be placed at a density of not less than 50 per hectare of suitable habitat in line with ARGUK guidelines. Translocation visits will be undertaken once or twice daily when the air temperature is between 9 and 18°C in the absence of wet or very windy weather. All captured reptiles will be placed into a secure suitable carrier with some green hay at the bottom and transported and released immediately into the off-site receptor area.

Although the target number of trapping checks is 70 separate visits (with a separate morning and afternoon visit counting as two visits), this should be used as a guide, with the total number of visits cut shorter if there is an early drop in captured numbers and at least 10 visits in suitable weather conditions are made without identifying any reptile presence within the construction zone. After the target of 70 trapping visits has been achieved the trapping visits will continue if reptiles are still being captured. The construction zone will be declared free of reptiles following five clear visits. Once this has been achieved, site clearance can begin through supervised a destructive search.

Destructive search at Batchelors Farm

Once the translocation works for the site have finished, a destructive search of all habitat will occur to render the site unsuitable for reptiles. All destructive search works will be overseen by a suitably qualified ecological clerk of works (ECoW) and will be carried outside of nesting bird season (1st March to 31st August) for any suitable nesting habitat.

Works will be carried out as follows:

- any vegetation (grassland or scrub) over 30cm in height will be cut back to 15cm, under ECoW supervision. Grassland will then be cut back to ground level no sooner than 12 hours after the initial cut (should one be required);
- a small digger with a toothed bucket will be used to remove the first 10-15cm of soil from the site. The digger will be used methodically, working in parallel lines no greater than the width of the bucket. Soil which has been removed will be piled onto areas of land which have already been confirmed as being free of reptiles by the ECoW, so as not to compact soil where slow worms may be underground. The digger will not travel unnecessarily, and an optimum route shall be determined by the operator and ECoW to ensure minimal impacts to soil or animals;
- any areas of man-made or artificial refugia (to be identified by the ECoW on site) will also be cleared by hand to ensure no trapping or crushing of animals.

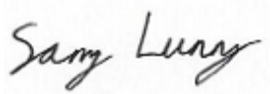
Any reptiles found during the destructive search will be translocated to the receptor site by the ECoW.

Once a destructive search has finished and if the construction zone is declared free of reptiles, works can begin as planned, with contact details for the acting ecologist passed on to all contractors in the very unlikely event protected species are identified on site.

All works impacting reptiles must be undertaken between the months of March to October (daytime temperatures must be consistently above 10°C), when reptiles are active and able to move safely.

A monitoring survey of the Pyecombe Golf Course receptor site will occur two years after the translocation has occurred, to ensure that reptile populations are remaining healthy and to inform any management adjustments for the receptor site.

Yours faithfully,

A handwritten signature in black ink that reads "Sam Lunn". The signature is written in a cursive, flowing style.

Sam Lunn

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For further information on The Ecology Co-op, please visit www.ecologyco-op.co.uk

Appendix 1 – Figures



Figure 1. Pyecombe golf course measuring 240acres / 97ha located within the South Downs National Park.



Figure 2. Approximate area of dense scrub to be removed (blue outline) to create a new area of rough open grassland with proposed hibernacula locations (brown dots).



Figure 3. Areas of grassland that are currently cut / collected and baled by a local farmer.



Figure 4. Approximate location of the proposed reptile fence at Batchelors Farm which runs inside retained habitat.