



26 March 2025

Re: Outline application for Land at Colwell Farm Lewes Road under reference DM/25/0445

Dear Ms Fisher,

I write in connection with the above planning application.

I note the consultation response from Place Services.

Place Services has not considered information on:

- The minimum 10% recommended Biodiversity Net Gain has not been obtained and the site will result in biodiversity loss. Millers Homes needs to explain how they will meet 10% BNG and change their proposal accordingly
- BNG assessment has missing data. Millers Homes needs to submit a full list of plant species and criteria met/unmet to allow an external evaluation of their assessment
- Millers Homes incorrectly classified the line of trees and may have incorrectly classified the grassland. A new BNG assessment needs to be submitted.
- The unique ecological value of site and its location relative to South Downs National Park and High Weald Area of Natural Beauty has not been considered by Millers Homes.
- Bat surveying by Millers Homes was unsystematic and does not meet Bat Conservation Trust guidelines and therefore need to be repeated
- Inconsistencies between EcIA and Millers Homes Lighting Strategy – developer needs to submit a unified lighting strategy so Place Services can assess the impact of its lighting strategy on bats and other wildlife
- Millers Homes has not included information on additional light sources, impacts on bat foraging and commuting habitats, direct mortality and injury to bats by construction, collision with road and predation by cats. This information needs to be provided by Millers Homes to allow a full assessment of its mitigation.
- Reptile surveying was insufficient to determine population size. The developer needs to carry out a full reptile survey meeting best practice guidelines.
- Guidelines state that on-site reptile mitigation should be a priority – Millers Homes should provide information on why this has not been considered
- Millers Homes has not followed its own mitigation strategies when removing Hedges and Bramble scrub adjacent to Dormouse locations. Information on this breach of should be explained by Millers Homes

- Millers Homes has omitted information on Badger territorial boundaries and the impact that the proposed development will have on the Badgers' territory
- Millers Homes' mitigations do not follow Natural England guidance on Badgers
- Bird surveying was insufficient to provide an accurate survey of bird population. Millers Homes needs to carry out a full bird survey meeting best practice guidelines.

Please can I request that you re-consult with Place Homes to ensure that all information about the site is taken into account.

I am aware that failure to assess all information provided may lead to a decision that is incomplete and this matter could be challenged by Judicial Review.

Thank you for your time in considering this submission.

Yours faithfully

