

Technical Note 03

Project: Land West of Turners Hill Road, Crawley Down (North of Huntsland)

Planning Ref: DM/25/0016, DM/25/0017

Date: April 2025

Consideration of Planning Consultation Response from Place Services (dated 24th March 2025)

1 Introduction

- 1.1.1 Aspect Ecology is advising Wates Developments in respect of ecological matters relating to Land West of Turners Hill Road, Crawley Down. Two sets of duplicate planning applications have been submitted at the site, relating to land to the south (application refs: DM/25/0014 and DM/25/0015) and north (DM/25/0016 and DM/25/0017) of Huntsland respectively.
- 1.1.2 Place Services, which provides ecological advice to inform Mid Sussex District Council, has provided planning consultation responses in relation to both sets of applications. This note provides consideration of the consultation response on the northern applications (DM/25/0016 and DM/25/0017) responding to the specific queries raised, namely on bats and biodiversity net gain (BNG).

2 Bats

- 2.1.1 The Place Services response notes that a number of trees were identified as supporting potential roost features for bats or requiring further assessment, and requests clarification as to which trees will be removed under the development. Where trees are to be removed, the response notes that further assessments must be undertaken in accordance with the Bat Survey Guidelines (Bat Conservation Trust, 2023), and that inspections should take place prior to determination to give the LPA certainty of likely impacts on protected species.
- 2.1.2 An assessment of trees for bat roosting potential has been undertaken as detailed within the Ecological Appraisal, with the results set out at Table 5.2 and a discussion of trees affected under the proposals at paragraph 5.3.19. An expanded summary table is provided below to provide clarification of proposed tree removals.

Table 1. Tree assessment results and proposed removals under applications DM/25/0016 and DM/25/0017

| Tree Ref. | Species | Assessment and potential roosting features | Summary | Affected under proposals? |
|-----------|---------|---|----------------------|---|
| T1 (5163) | Oak | Mature Oak with deadwood on westward facing limb, multiple other sections of dead limbs which are producing collars and potentially crevices. | PRF-M | Located outside of application boundary |
| T2 (5162) | Ash | Multi-stem Ash with relatively narrow stems only 20-30cm diameter, some Ivy cover. | Negligible potential | Located outside of application boundary |
| T3 (3018) | Oak | Mature Oak with several dead protruding limbs | PRF | Located outside of application boundary |
| T4 (3012) | Beech | Young multi-stem Beech with some diseased growth. | PRF | Located outside of application boundary |
| T5 (5091) | Ash | Semi-mature Ash with a single rot hole evident. | PRF | Located outside of application boundary |

| Tree Ref. | Species | Assessment and potential roosting features | Summary | Affected under proposals? |
|------------------|--------------------|---|----------------------|---|
| T6 (5114) | Ash | Semi-mature Ash with dense Ivy. | PRF | Located outside of application boundary |
| T7 (713) | Ash | Some minor deadwood noted. | FAR | Located outside of application boundary |
| T8 (5358) | Oak | Mature Oak with some deadwood features. | PRF | Located outside of application boundary |
| T9 (5357) | Oak | Large mature Oak. No features evident but could support some potential given size/age. | FAR | Located outside of application boundary |
| T10 (5346) | Oak | Large mature Oak. No features evident but could support some potential given size/age. | FAR | Located outside of application boundary |
| T11 (5345) | Oak | Mature Oak with deadwood features present. | PRF | Located outside of application boundary |
| T12 (5369) | Oak | Veteran Oak with deadwood features present. | PRF | Located outside of application boundary |
| T13 (1073) | Oak | Mature Oak with deadwood features present. | PRF | Located outside of application boundary |
| T14 (1068) | Oak | Veteran Oak with several features that could support roosting bats including large rot hole, and a horizontal crack forming a cavity. | PRF-M | Located outside of application boundary |
| T15 (4720) | Oak | Large mature Oak. No features evident but could support some potential given size/age. | FAR | Retained – located at site boundary |
| T16 (2744) | Oak | Mature Oak with several knot holes and collars providing potential roost features. | PRF-M | Retained – located within open space adjacent to site boundary |
| T17 (2743) | Oak | Mature Oak with numerous collars, dead branches and splits evident. | PRF-M | Retained – located within open space adjacent to site boundary |
| T18 (6000) | Oak | Mature Oak with several knot holes and collars providing potential roost features. | PRF-M | Retained – located within open space adjacent to site boundary |
| T19 (858) | Oak | Large mature Oak. No features evident but could support some potential given size/age. | FAR | Located outside of application boundary |
| T20 (4141) | Ash | Large mature Ash with knot holes which may lead to cavities. | PRF | Retained – located at site boundary |
| T21 (3270) | Ash | Small split on limb. | PRF | Retained – located within retained hedgerow corridor |
| T22 (3268) | Ash | Two transverse splits on large limbs. | PRF-M | Retained – located within retained hedgerow corridor |
| T23 (3267) | Ash | Mature Ash with extensive rot and open rot holes/wounds on central trunk. | PRF-M | Retained – located within retained hedgerow corridor |
| TG24 (3261-3265) | Ash | Several small Ash trees with die-back, potential features could be present. | FAR | Removed for road access |
| TG25 (3259-3260) | Ash | Two medium sized Ash trees, one with knot holes, one with splits on collusion. | PRF-M | Retained – located within retained hedgerow corridor |
| TG26 (G54) | Willow, Birch, Ash | Mostly collapsed Willow and Ash with die-back, could support potential features. | FAR | Possible removal of Ash required due to die-back |
| TG27 | Ash | Several young trees. No bat potential evident. | Negligible potential | Possible removal of single Ash (tree 2178) required due to die-back |
| TG28 | Various | Numerous young trees. No bat potential evident but not surveyed in detail. | FAR | Located outside of application boundary |

| Tree Ref. | Species | Assessment and potential roosting features | Summary | Affected under proposals? |
|--------------------------|---------|--|--|--|
| T30 (5164) | Oak | Veteran Oak, may support potential features. | FAR | Located outside of application boundary |
| T31 (5160) | Oak | Veteran Oak, may support potential features. | FAR | Located outside of application boundary |
| T32 (6053) | Alder | Multistem Alder at watercourse margin, largely dead with deadwood and rot holes | PRF-M | Located outside of application boundary |
| W13 | Various | Trees affected by proposed road access were subject to survey and were not recorded to support bat roosting features. | Negligible potential supported by affected trees | Located outside of application boundary |
| Other woodland and trees | Various | Other woodlands and trees not directly affected by development proposals and not subject to detailed survey, albeit potential features may be present. | FAR | Two trees within W8 (4137 and 4138) proposed for removal for pedestrian/cycle route. Partial removal of Goat Willow scrub (G53). Other woodland and trees retained or located outside of application boundary. |

*Tree numbers under tree survey are shown in brackets

2.1.3 As set out above, removal of trees under this application are limited to TG24, partial removal of trees within TG26 and TG27, two trees within W8 and an area of Goat Willow scrub (G53). Further discussion of these trees is set out below:

- TG24 – several small Ash trees with die-back. These were subject to ground level inspection in August 2024 and no suitable roosting features were identified, although have been categorised as FAR on a precautionary basis due to the risk of features developing in the future due to die-back.
- TG26 – contains a small Ash tree with die-back, proposed for removal. Subject to ground level inspection in August 2024 and no suitable roosting features were identified, although has been categorised as FAR on a precautionary basis given its location within a tree group limiting full access for inspection, and risk of features developing in the future due to die back.
- TG27 – contains tree 2178 proposed for removal. Trees were subject to ground level inspection in August 2024 and no PRFs identified.
- W8 – further ground level inspection has been completed on 31 March 2025. This recorded butt rot on tree 4138 with a single small, exposed cavity noted at ground level, forming a PRF-I. Some standing dead wood with exposed heartwood forming a further PRF-I was noted immediately south-east of tree 4138 (not separately identified under the tree survey). No PRF were identified on tree 4137.
- Goat Willow scrub (G53) – comprises young trees not supporting PRFs.

2.1.4 On the basis of the above, tree 4138 and adjacent standing dead wood have been recorded to support PRF-Is. No other PRFs were identified, albeit TG24 and TG26 were categorised as FAR on a precautionary basis, with the recommendation that further inspections are undertaken prior to felling. Accordingly, the following mitigation measure is proposed (superseding MC7 within the Ecological Appraisal).

MC7a – Bat Potential Trees. *To safeguard bats during removal of trees within TG24, TG26 and W8, a further inspection will be undertaken by a suitably qualified ecologist immediately prior to felling, with use of an endoscope and climbing inspections (if required) to examine any cavities to ensure that bats are absent and that no evidence of a roost (e.g. droppings) is present. Felling of any trees with PRFs will then be carried out using a ‘soft-felling’ technique, whereby sections of the tree will be cut and lowered to the ground, followed by leaving the felled sections on the ground for a period of at least 24 hours to allow any bats, should these be present, to escape.*

If any evidence for the presence of roosting bats is recorded, works on that tree will be suspended and consideration will be given to the need to undertake works under a European Protected Species (EPS) development licence, and a licence application will be made to Natural England as required.

To compensate for the loss of potential roosting resource, a woodcrete bat box will be erected for each affected PRF, placed on retained trees within the nearby vicinity of the affected feature.

- 2.1.5 The above measures accord with the recommendations made by Place Services, and this is considered to form a proportionate response given the level of potential recorded and the outline nature of the proposals, with tree removals to be confirmed as part of detailed matters.
- 2.1.6 In this instance, all relevant trees have been subject to a ground level inspection and no PRF-Ms have been identified requiring further assessment. Nonetheless, a recent appeal decision at Wisley Airfield (appeal ref: APP/Y3615/W/23/3320175, decision dated 24 May 2024) confirms that it may be appropriate to defer such survey work to a later stage, the Inspector setting out at paragraph 120 “it should be noted that most of the trees are to be retained, albeit that some in the wet woodland in the southern SANG would be removed to accommodate the footbridges and sculpture park. It would be unreasonably onerous to require full climbed surveys of these trees to be done now. If a tree is to be removed then its potential would need to be reassessed at the time, not least because bats are a mobile species. Tree works with the potential to affect a roost would require the necessary licences and most likely an updated survey.” Accordingly, the approach followed is concluded to be fully robust in terms of providing the necessary information for determination on the presence of otherwise of protected species and the extent to which they may be affected by the proposed development.

3 Biodiversity Net Gain

- 3.1.1 The Place Services response states that the Statutory Biodiversity Metric Calculation Tool is not accompanied by condition assessments, and therefore insufficient information has been provided for determination.
- 3.1.2 The Biodiversity Net Gain report sets out at paragraph 3.1.1 that descriptions of the pre-development (‘baseline’) habitats are set out within the Ecological Appraisal, together with habitat condition assessments.
- 3.1.3 A summary of the habitat types and condition is provided at Tables 4.1a and 4.1b within the Ecological Appraisal, with a habitat condition assessment matrix providing full details of the condition assessment criteria at Appendix 6482/7. This is taken directly from the Condition Assessment Sheets at Technical Annex 1 of the Statutory Biodiversity Metric. Further detail in relation to grassland and hedgerow habitats is provided at Appendix 6482/6.

- 3.1.4 Accordingly, full information on habitat condition assessment is available to ensure that baseline habitats have been recorded appropriately.
- 3.1.5 The Place Services response also raises some queries regarding post development habitats. Such matters relate to biodiversity gain which would be secured by condition as a pre-commencement requirement. Accordingly, it is proposed that these queries are addressed at this later stage when full details of habitat creation and management are available as part of detailed matters.

4 Conclusion

- 4.1.1 This note provides a response to queries raised within the consultation response from Place Services on the northern applications at Land West of Turners Hill, Crawley Down (DM/25/0016 and DM/25/0017).
- 4.1.2 Further clarification is provided in relation to bats and trees with roosting potential, supplemented by a further inspection of trees within woodland W8. It is confirmed that all relevant trees have been subject to a ground level inspection and no PRF-Ms have been identified requiring further assessment. Nonetheless, a precautionary approach is proposed given the identification of two PRF-Is and potential for additional features due to visibility limitations or known Ash die-back.
- 4.1.3 Clarification is also provided on biodiversity net gain and condition assessment information, which is fully provided within the Ecological Appraisal report.