



19 September 2024

Joseph Swift
Mid Sussex District Council
Oaklands Road
Haywards Heath
RH16 1SS

By email only

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Sussex District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Dear Joe

Application: DM/23/2610
Location: Land South Of Hanlye Lane Longacre Crescent Cuckfield West Sussex
Proposal: Residential development of 55 dwellings with vehicular and pedestrian access, car parking, open space, play space, landscaping and all other associated works

Thank you for further re-consulting Place Services on the above application.

Holding Objection pending further information on European Protected Species (bats) and Priority species (invertebrates) and non-mandatory Biodiversity Net Gain	Yes
No ecological objections	
Recommended Approval subject to attached conditions	
Recommended Discharge of condition	

Summary

We have reviewed the Protected Species Report Revision 2 (Urban Edge Environmental Consulting, June 2024), Confidential Technical Note – Badger Survey (Urban Edge Environmental Consulting, June 2024), Preliminary Ecological Appraisal Report Revision 4 (Urban Edge Environmental Consulting, June 2024) and Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting, October 2023) supplied by the applicant, relating to the likely impacts of development on protected species & Priority species and habitats, with identification of proportionate mitigation and non-mandatory Biodiversity Net Gain.



We are still not satisfied that there is sufficient ecological information available for determination of this application as we note that the Protected Species Report Revision 2 (Urban Edge Environmental Consulting, June 2024) states there are numerous other trees within the survey area which would have high suitability for roosting bats. The report states in Section 0.3.4 that '*The majority of these trees will be retained.*' We therefore request clarification as to whether Ground Level Tree Assessments have been undertaken on any other trees to be removed. This is necessary for the LPA to have certainty of likely impacts on bats prior to determination.

We understand that there were no records for Brown Hairstreak butterfly during the invertebrate survey, although we welcome the incorporation of habitat management for this species in Sections 5.2.9 to 5.2.12 of the Protected Species Report Revision 2 (Urban Edge Environmental Consulting, June 2024). However, it is not clear if the survey included Stag Beetle and Purple Emperor butterfly as recommended in the Preliminary Ecological Appraisal Report Revision 4 (Urban Edge Environmental Consulting, June 2024). We therefore request clarification as to whether these Priority species were also the subject of the invertebrate survey.

We welcome the ecological enhancement recommendations in Section 5.5 of the Preliminary Ecological Appraisal Report Revision 4 (Urban Edge Environmental Consulting, June 2024) and understand that these will be reviewed and updated following the completion of the recommended protected species surveys.

Biodiversity Net Gain

We have reviewed the Statutory Biodiversity Metric (June 2024) and the Biodiversity Net Gain Assessment (Urban Edge Environmental Consulting, June 2024). We note that there will be a net loss of -34.39% for habitat units and a net gain of 52.86% for linear hedgerow units (Biodiversity Net Gain Assessment (Urban Edge Environmental Consulting, June 2024)). As this does not meet Mid Sussex District Council Policy DP38 for no net loss and the National Planning Policy Framework (December 2023) which requires measurable net gain of biodiversity, further information is required for off-site measures to achieve, at the least, no net loss of biodiversity.

Additional information

We note from the Protected Species Report Revision 2 (Urban Edge Environmental Consulting, June 2024) that no roosting bats were recorded using tree TN1 (Black Pine), which is due to be removed. We therefore agree that no further surveys are required for this tree.

We note from the Protected Species Report Revision 2 (Urban Edge Environmental Consulting, June 2024) that a European Protected Species Mitigation Licence for Hazel Dormouse will be required before commencement of any works and recommend that a copy of this is secured by a condition of any consent. We support the outline mitigation measures in Section 5.2.15 of the Protected Species Report Revision 2 (Urban Edge Environmental Consulting, June 2024).

We support the recommendation in the Confidential Technical Note – Badger Survey (Urban Edge Environmental Consulting, June 2024) for a pre-commencement check prior to commencement of works.

We also support the outline measures for the Reptile Mitigation Strategy in Section 5.2.17 of the Protected Species Report Revision 2 (Urban Edge Environmental Consulting, June 2024). We recommend that the



receptor site should be identified prior to determination and the Reptile Mitigation Strategy should be secured by a condition of any consent.

We note that ancient woodland (irreplaceable habitat) lies adjacent to the south and the east of the site (Horsgate West and Horsgate East respectively). Therefore a 15m buffer will be required between any works and the woodlands in line with [Government Standing Advice](#).

Please note that we have no comments on Great Crested Newt as we have been instructed to leave comments on this species to the [NatureSpace Partnership](#).

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Please contact us with any queries.

Yours sincerely

Genevieve Broad MCIEEM MSc BSc (Hons)

Ecological Consultant

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Place Services provide ecological advice on behalf of Mid Sussex District Council

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.