



30th May 2025

Joanne Fisher
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.

Application: DM/25/0445
Location: Land At Colwell Farm Lewes Road Haywards Heath West Sussex
Proposal: Outline application with all matters reserved except for access, for up to 80 dwellings with associated landscaping, open space, infrastructure and vehicular and pedestrian accesses. **UPDATED INFORMATION** of highways layby plan, Transport Note, response to Ecology consultation comments and updated Landscape Visual Impact Assessment.

Dear Joanne,

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

Recommended Refusal	
No ecological objections	
Recommended Approval subject to attached conditions	
Subject to Natural England's comments on the conclusion of the Water Neutrality AA	
Further information required on mandatory Biodiversity Net Gain	Yes
Recommended Discharge of condition	

Summary

We have reviewed the Response to Ecology Comments (Ecosupport, April 2025), Ecological Impact Assessment (Ecosupport Ltd., January 2025), relating to the likely impacts of development on designated sites, protected and Priority species & habitats with identification of appropriate mitigation measures and Biodiversity Net Gain.

In addition, we have reviewed the BNG Assessment and HMMP (Ecosupport, April 2025), BNG Assessment and HMMP (Ecosupport, January 2025), Statutory Biodiversity Metric Rev 03 (April 2025) and Statutory Biodiversity Metric (April 2024), relating to securing mandatory biodiversity net gains.



We note the concerns of a local resident concerning bats, reptiles and biodiversity net gain with regard to bracken. We have addressed these concerns in this response.

We provide ecological advice to Mid Sussex District Council with the aim of ensuring that all developments meet legal requirements to protect wildlife and habitats, as specified in Policy DP38 of the Mid Sussex District Plan 2014-2031. The information requested in this temporary holding objection will ensure that appropriate mitigation measures are in place for protected species and habitats prior to determination to enable the LPA to make a lawful decision.

With regard to mandatory biodiversity net gains, we have reviewed the BNG Assessment and HMMP (Ecosupport, April 2025) and Statutory Biodiversity Metric Rev 03 (April 2025) and are still not satisfied that appropriate information has been provided prior to determination. This is because of the reason set out below:

- The BNG Assessment and HMMP (Ecosupport, April 2025) states that there will be a net loss of -12.07% in habitat units, but the submitted Statutory Biodiversity Metric Rev 03 (April 2025) indicates a gain in habitat units of 0.72%.
(Please note that the gain of 441.54% in hedgerow units is the same in the two documents).

We note that our previous concerns have been addressed as follows:

- Lowland mixed deciduous woodland has now been included in the assessment.
- We accept that the ditch on the eastern boundary is outside the red line boundary of the site and that the ditch between the west and central grassland parcels does not meet the criteria for a 'ditch' as it is dry and lacks vegetation. We welcome the clarification of the location of the ditch on the baseline habitats map.
- We also welcome the clarification that the cover of bracken is less than 20% and that the cover of scrub is less than 5%. We therefore agree with the inclusion of these habitats in the neutral grassland classification.

Additional comments

We note from the Ecological Impact Assessment (Ecosupport Ltd., January 2025) that there are no buildings on site and therefore agree that no surveys for roosting bats in buildings are required.

We note that the rare Barbastelle bat has been recorded on site and therefore we support the implementation of dark corridors as embedded mitigation to avoid impacts to this species (Section 6.2.4 of the Ecological Impact Assessment (Ecosupport Ltd., January 2025)).

We welcome the clarification in the Response to Ecology Comments (Ecosupport, April 2025) that all trees proposed for removal have been subject to a Ground Level Tree Assessment (GLTA). We understand that the only trees to be removed are the four trees in the northeast of the site which have Potential Roost Features for Individual bats (PRF-Is) (2 x Sycamore, 1 x Ash and 1 x Oak). We therefore highlight that appropriate compensation will be required in advance of works to avoid loss of roost resource (Reason and Wray (2023) *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1*. Chartered Institute of Ecology and Environmental Management). We support the non-licensed Precautionary Working Method Statement in the Response to Ecology Comments (Ecosupport, April 2025), which includes inspection of any affected



trees by endoscope on the day and felling under the supervision of a licensed bat ecologist, as required in Table 6.3 of 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023).

We note from the Ecological Impact Assessment (Ecosupport Ltd., January 2025) that a 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. This is because Hazel Dormouse nests were found on site during survey and the proposed plans will require removal of hedgerow / mature trees and bramble scrub, although we understand that the plans for vegetation clearance have not been finalised at this stage. We support the outline mitigation measures in Section 6.6.2 of the Ecological Impact Assessment (Ecosupport Ltd., January 2025). Please note that the numbering of the paragraphs is incorrect and the clearance methodology which follows Section 6.6.2 is specified in sections which are numbered 6.5.3 to 6.5.6.2.

We agree that sufficient survey effort has been undertaken for reptiles as seven surveys were undertaken in April and May 2024 (Ecological Impact Assessment (Ecosupport Ltd., January 2025)). This is the minimum number of surveys recommended for reptiles in the Survey Protocols for the British Herpetofauna Version 1.0 (Sewell, Griffiths, Beebee, Foster and Wilkinson, March 2013). The surveys concluded that there are low populations of Slow Worm, Common Lizard and Grass Snake on site and we therefore support the Reptile Mitigation Strategy in Section 6.4 of the Ecological Impact Assessment (Ecosupport Ltd., January 2025). We also support the identified receptor site in the eastern area of the site, which comprises 1.117ha grassland with woodland edge and the five-year management plan for the receptor site in the Response to Ecology Comments (Ecosupport, April 2025). We welcome the implementation of two reptile hibernacula in the area and the creation of a SUDs feature in the southeast of the site (Response to Ecology Comments (Ecosupport, April 2025)).

We recommend the implementation of a Precautionary Working Method Statement to protect mobile protected species (including Hedgehog, which is a Priority and threatened species). This needs to be secured by a condition of any consent and implemented in full.

We also support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Ecological Impact Assessment (Ecosupport Ltd., January 2025) to avoid impacts from light disturbance. This should be secured by a condition of any consent and implemented in full. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely to be present within the local area. This should summarise the following measures recommended by [Guidance Note:08/23](#) (Institute of Lighting Professionals) will be implemented:

- Do not provide excessive lighting. Light levels should be as low as possible as required to fulfil the lighting need.
- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used.
- Warm White lights should be used at <2700k. This is necessary as lighting which emits an ultraviolet component or that has a blue spectral content has a high attraction effect on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- Where appropriate, external security lighting should be set on motion-sensors and set to as short a possible a timer as the risk assessment will allow.
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.



- Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and so should not be relied upon solely

We also support the recommendation that a buffer of 15m between any works and the ancient woodland (irreplaceable habitat) is required (Ecological Impact Assessment (Ecosupport Ltd., January 2025) in accordance with Government Standing Advice.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 187d and 193d of the National Planning Policy Framework (December 2024). The reasonable biodiversity enhancement measures should be outlined within a separate Biodiversity Enhancement Layout and should be secured by a condition of any consent.

Please note we do not provide comments on Great Crested Newt as we have been instructed to leave comments on this European Protected 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

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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.