



Unit 4, Langham Stables, Langham Lane, Lodsworth, Petworth, West Sussex, GU28 9BU.

19th May 2026

Ref: Land at Borde Hill Lane, Haywards Heath, West Sussex for the erection of up to 125 dwellings (app ref DM/25/3129)

To Mr Steven king

I write further to correspondence received on application ref DM/25/3129 by Place Services (their ref: 13857). This letter appears to draw on two concerns that have formed a holding objection on this application, whilst I also wish to make clear a point on the summary text at the start of this response regarding dormice.

In the third paragraph of the letter, it is summarised that *"We are still not satisfied there is sufficient ecological information available for determination of this application and recommend that outline mitigation measures for hazel dormouse and details of survey results, mitigation and enhancement measures for bats are required to make this proposal acceptable. In addition, we are not satisfied that appropriate information with regard to mandatory biodiversity net gains has been supplied for the application prior to determination"*.

Hazel Dormouse

The Place Services response supports the outline Mitigation set out within the EclA, stating on page 5 of their response that *"We support the outline mitigation measures for Hazel Dormouse to support the EPSML application in Section 5.6.2 of the Ecological Impact Assessment Rev 02 (The Ecology Co-op, April 2026)"*. This does appear to contradict the statement within the first page of this response, however the Ecology Co-op has prepared further detailed mitigation within a Mitigation Statement, which will accompany this letter.

Bats

I do not believe that the Ground Level tree Assessment (GLTA) report for this site has been passed to Place Services for commentary (this was uploaded on the 17th April by Woolf Bond). This summarised more detailed assessments of two trees (T44 and T50). T44 is a Scot's pine tree that is dead and presents a fall risk. It has two woodpecker holes in it and has a trunk diameter of no more than 25cm. A climbed assessment of the tree is not possible to explore the extent of the woodpecker holes, however the tree has been rated PRF-I owing to the narrow trunk diameter where the woodpecker holes are located. T50 is a large mature oak tree and a climbed assessment of the limb facing the bank

downgraded the identified feature to negligible, from an initial ground assessment identifying the tree as PRF-I. A callous roll feature forming. A narrow channel was found to be exposed from the top, meaning the feature did not create a sealed crevice.

Other retained trees within the woodland parcel illustrate the retention of trees with suitable roost features for bats and opportunities through detailed design will see the creation of a large number of new roost features for bats, with the EclA committing to no less than 20 artificial bat roosts to be created both into the new building design and onto retained trees.

I believe the provision of the GLTA report to Place Services will satisfy their requirements to remove the holding objection with respect to bats.

Biodiversity Net Gain

On Page 4 of their response, Place Services state that *“the following additional information is now required:*

- The Sussex Local Nature Recovery Strategy has been published. Therefore, the all biodiversity units for the pre-development baseline should be recorded as containing ‘low strategic significance’ in line with the Statutory Biodiversity Metric – User Guide. As a result, an updated and Statutory Biodiversity Metric – Calculation Tool should be submitted to account for this minor update to the pre-development baseline.”*

We have re-checked the Sussex Nature Recovery Website (<https://www.sussexnaturerecovery.org.uk/publications>) and this states that only the two draft Local Nature Recovery Strategies (LNRS) covering West Sussex, East Sussex and Brighton and Hove have been published, with the Amended LNRS documents presently with supporting authorities for a final statutory review. These are expected to be published in June 2026.

We do not therefore have sight of the LNRS for this area and I do not believe it is correct for us to update the metric based on an unpublished strategy, which may have been sent to Place Services in advance of its release.

I hope this letter is useful in helping to progress this application to determination and I will be happy to answer any queries that arise with urgency.

