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Ref: Land north of Balcombe Road, Haywards Heath

The Ecology Co-op has been commissioned to write a letter responding to comments on the planning application DM/25/3129 at land north of Balcombe Road, Haywards Heath. This letter will address the following concerns raised:

- Dormouse mitigation
- Ground-level tree assessments
- Biodiversity net gain

Dormouse mitigation

Dormouse presence was confirmed on site through surveys undertaken in 2024 and previously confirmed to be on site through surveys undertaken in 2020. As detailed in the EclA, a mitigation strategy is necessary for this site as a part of the European Protected Species (EPS) licencing process. A detailed Mitigation Statement is being prepared, although this may be subject to change with potential future changes to the scheme as it moves from an outline planning application to a reserved matters application.

Ground-level tree assessments

The trees proposed for removal as a part of the current scheme have now been identified, and will undergo ground-level tree assessments to determine their potential to support roosting bats, and whether any further surveys are required. A report will be produced with the results of this survey to be read as an addendum to the EclA.

Biodiversity net gain

The habitat maps created as a part of the biodiversity net gain calculation matches the most up to date landscape plan. The existing and the proposed maps show land contained within the red line boundary, as shown on the landscape plan, and land within a green line boundary which is proposed as off-site gains to allow 10% net gain to be achieved for habitats and hedgerows without the need to purchase credits, thus ensuring the best possible outcome under the Biodiversity Mitigation Hierarchy.



With the current plans and constraints of the site, it is not possible to achieve an increase in the condition of the watercourse present to the north of the site, and therefore not possible to achieve the 10% net gain on site for watercourse units. Therefore, the remaining 0.88 watercourse units will be obtained by an off-site provider to address this discrepancy and meet national legislation, as stated within the Biodiversity Impact Calculation report. This is also in accordance with the Biodiversity Gain Hierarchy, where the potential for gains on-site have been explored before concluding that off-site units would need to be purchased in order to meet the 10% gain requirement.

The strategic significance of the habitats, hedgerows and watercourses was calculated using the Local Plan for the authority, in which it was determined whether each habitat type was specified within the plan, as proposed by the Statutory Biodiversity Metric user guide where a Local Nature Recovery Strategy has not yet been published.

Age of Survey Data

The only guidance on the validity of survey data lifespan is provided by CIEEM¹. This guidance states that for data between 18 months and 3 years old 'The professional Ecologist will need to issue a clear statement, with appropriate justification, on:

- The validity of the report;
- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey(s).

This letter can act as the aforementioned statement.

The application site has been subject to surveys over a prolonged period, with survey data first being collected in 2020 and being subject to further data collection in 2022 and 2024. It is therefore a well understood site, that has remained quite 'static'. This is to say it has changed in nature very little over this time and there have not been any significant new findings between assessments.

The site supports a known presence of dormice, common reptiles and is known to be used for foraging purposes by an assemblages of generally more common and widespread bat species. There has been consistency in the data gathered to indicate that the static nature of the habitats at the site have been mirrored with little noticeable changes in the species recorded there between 2020 and late 2024. This supports a reasonable conclusion that little will have changed in the ecological value of the site by this point in early 2026 and for species like hazel dormouse, presence is assumed for at least 5 years after the most recent identification, meaning no further survey effort would be necessary to inform an impact assessment.

The site has been visited as recently as the 12th March 2026 in order to establish that there have not been any notable changes to site conditions and re-assess some of the trees.

In line with the requirements of a later Reserved Matters application, the site would be re-examined to establish if there would be any notable changes in the baseline biodiversity value of the site as recorded in the Statutory biodiversity Metric and new calculations would further consider any revisions to the site masterplan, ensuring an up to date consideration at that point. We are entirely confident that this development is able to illustrate a reliable and effective outcome to ensure it

¹ Advice Note on the Lifespan of Ecological Reports and Surveys (April 2019), CIEEM



maximises its potential to deliver an appropriate on-site biodiversity uplift in line with the requirements of the Biodiversity Mitigation Hierarchy.

I trust the above addressed the concerns presented, along with the reports which are to follow.

Kind regards,

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