

Hamish Evans

From: [REDACTED]
Sent: 11 July 2025 19:43
To: Hamish Evans
Subject: Application Reference: DM/25/0589 - Object

Application Reference: DM/25/0589

Address: Land North Of Leylands Road Burgess Hill West Sussex

Proposal: The installation of 1 No. 30 metre high lattice tower mounted with 6 No. antennas, 12 No. cabinets, within a compound comprised of 2.4 metre high palisade fencing painted green, 1 No. electrical metre cabinet and associated development thereto. (amended plans received 25.04.2025, amended photo montage received 01.05.2025, amended description 06.05.2025 and amended Ecology information 19.06.2025)

Case Officer: Hamish Evans

[REDACTED]
Address Line1: 10 The Blackthorns
Town/City: Burgess Hill
Postcode: RH15 8HW

[REDACTED]
Commenter Type: Neighbour or general public
Stance: Customer objects to the Planning Application

Reasons for comment: Disappointed with the updated Preliminary Ecological Appraisal with Public Records Search

Comments: I would like to express my continued concern regarding the ecological report prepared by Betts Ecology.

At the end of March 2025, I brought to their attention the presence of several water bodies within close proximity to the site—ranging from 160 to 400 metres, with one in the Habitats Plan itself. (on Page 5) I provided clear guidance on their locations and expected that these would be included in their updated report?

Unfortunately, I note with disappointment that the revised report still contains no reference to these features, despite the surveyor being made aware of their presence (see correspondence below). While the likelihood of Great Crested Newts was quickly dismissed, no further consideration appears to have been given to the wide range of other aquatic or semi-aquatic species that may depend on these habitats. The absence of any assessment or mention of these water bodies suggests they were entirely overlooked.

This raises important ecological concerns:

Significant habitat value may have been dismissed prematurely, potentially missing species such as frogs, dragonflies, water voles, and aquatic invertebrates.

Connectivity between ecosystems is jeopardised when nearby water bodies are ignored, reducing the accuracy of ecological impact assessments.

Planning decisions based on incomplete data may fail to meet environmental obligations or miss vital mitigation opportunities.

Some areas of concern from the latest report.

Ponds/water courses	There are no ponds or watercourses on site. The nearest water bodies are >300-400m from the proposed development site.
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<u>Mammals</u> (NB. Several species and their habitats have very strict protection in law.)	
Water vole	No suitable habitat for this species on site.
Great crested newt	There are no ponds or watercourses within the survey area and the terrestrial habitat is particularly poor foraging habitat for this species.
Natterjack toad	Not found in this area.
Other amphibia	None.

<u>Macro-invertebrates</u> Historically, macro-invertebrates have received relatively sparse attention in habitat surveys. Recent alarming declines in insect and other invertebrate populations coupled with the realisation of the great ecological importance of these taxa mean more detailed appraisal is required ⁶ . Several species enjoy legal protection.		
Ref.	Habitat	Designations A-E (list all) if habitat present on site
5	Open water (rivers, lakes, streams, ponds, ditches, etc.)	E (absent)

<u>PUBLIC RECORDS SEARCH</u>		
Source	Data/Response	Betts comment
<u>SxBRC</u>	The public records search revealed records of Common Toad, Common Frog, Smooth, Palmate and Great Crested Newt within the 2km search area	There are no aquatic habitats on site. The maintained /modified grassland is sub-optimal terrestrial habitat for both amphibians and reptiles.

Can these species just be dismissed because their environment has been omitted from the Ecology Report?

Take the Governments Guidance on Water voles for example, taken from their website!

<https://www.gov.uk/guidance/water-voles-advice-for-making-planning-decisions>

Absence of a record does not mean there are no water voles. It could mean there is no survey data available for that location.

You should also ask for a survey if the habitat is suitable for water voles, for example, if there are:

- soft earth banks for burrowing
- wide swathes of soft vegetation growing from the banks and in the water
- slow-flowing water courses or clustered ponds and wetlands of varying depths
- places for water voles to escape from predators

Water voles can be present in habitats where water bodies are not connected.

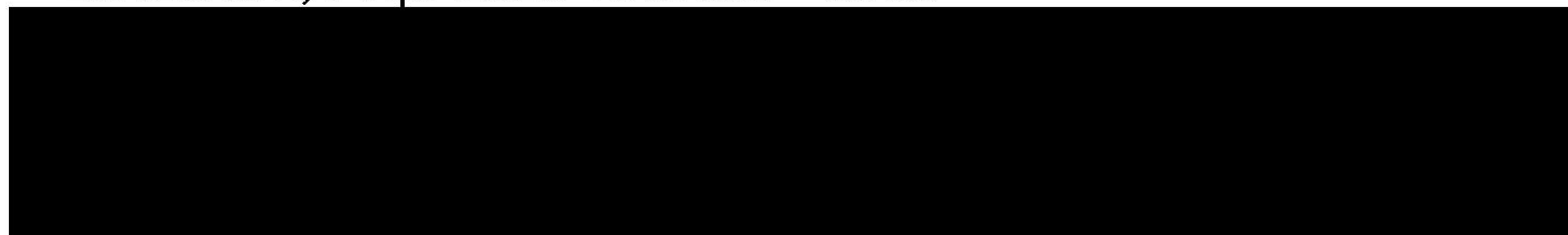
You must check if the ecologist is qualified and experienced to carry out surveys for water voles. CIEEM publishes:

Email trail with Betts Ecology.

----- Forwarded Message -----

Subject:7272 Important Wildlife and Water Body Observations in the Proposed Development Area

Date:Mon, 7 Apr 2025 10:34:57 +0000



Hi [REDACTED]

Please see below response from the ecologist who visited site. I hope this helps.

In answer to the further information provided, there was no obvious waterbody that I recorded either visually or audibly however it could have been missed or was restricted by access via the railway line fencing.

However, whilst the further information from Mr [REDACTED] is helpful it is worth noting that the streams/ watercourses that Mr [REDACTED] highlights are generally unsuitable habitats for newts of all species as they are flowing water. Newts (all species) prefer still water during the breeding cycle, hence why they prefer ponds. They also like tussocky long grass and woodland with fallen debris etc to hibernate over the winter.

Mr [REDACTED] doesn't specify the species of newt he has in his garden however it is only the great crested newt that is specially protected against killing and injuring, all others are protected against the sale or trading of them. The location of the proposed development does not affect any breeding ponds of great crested newts, and the terrestrial habitat is maintained and therefore poor quality for both foraging and hibernation purposes.

Kind regards

Natalie Sharp

Sales & Project Manager

From: [REDACTED]

Sent: 25 March 2025 16:55

Subject: Important Wildlife and Water Body Observations in the Proposed Development Area

Hello

This email refers to a Preliminary Ecological Appraisal document that Sean McMinn produced for Cellnex.

It has become a part of the Mid Sussex District Planing document for reference DM/25/0589.

PRELIMINARY ECOLOGICAL APPRAISAL	
Surveyor	Sean McMinn.
Confirm site risk assessment completed	Yes.
Site address	Land North of Leyland Grange Close, Worlds End, Burgess Hill, RH15 0RZ.
Project proposed if known	Construction of new communication mast.
Boundary as specified by client	YES.
Central OS Grid Ref.	TQ 32113 20297
Survey date	16 th of December 2024.

https://padocs.midsussex.gov.uk/PublicAccess_Live/Document/ViewDocument?id=BDB6C25B6D5F4FBDBE1E444F5BC5E777

Upon reviewing the document related to the proposed development, I noticed a detail regarding water bodies being stated as over 300–400 meters from the site. I'd like to bring to your attention some critical information that might not have been apparent during the initial survey.

There are streams both within the development site itself and approximately 160 meters to the north. These streams originate from culverts beneath the railway and eventually flow into a River Adur tributary in the Bedelands Nature Reserve.

1. The stream within the development site exits the culvert at `///backed.cross.slurs` (what3words). It connects to an open drain running from Wivelsfield Station further south. While the drain and culvert are inaccessible due to the railway fence, water flow is audible at times.
2. The stream then passes under the path, emerges behind number 9 The Blackthorns, continues around the houses, and flows into the nearby woods. (Coopers Shaw)

These water bodies remain active all year-round, even during extreme summer conditions in recent years. Furthermore, I have a pond that hosts newts, which access the development site and streams through a Hedgehog Hole in my fencing. Hedgehogs and other wildlife regularly use this pathway, and frogs are frequent visitors to my garden and those of my neighbours.

I understand the original survey may not have captured these details, and I appreciate that a revisit is planned before construction begins. I hope this information helps highlight the rich biodiversity in and around the development site, which warrants careful consideration.

In addition, I'd like to note the impact of previous railway work in 2019, during emergency repairs from a landslip. Heavy plant operations in the same area led to tree removal, causing a significant decline in newts and frogs for four years—only now have they begun to return.

Thank you for your time and attention to these observations. Should you require further information or wish to discuss, I'd be more than happy to assist.

Best regards,



10 The Blackthorns
Burgess Hill
RH15 8HW