

## PRELIMINARY ECOLOGICAL APPRAISAL (PEA) WITH PUBLIC RECORDS SEARCH

LAND NORTH OF LEYLAND GRANGE CLOSE  
WORLDS END BURGESS HILL RH15 ORZ.

### RESULT INDICATOR OF THIS SURVEY

- **RED.** Do not proceed. Without major modification this project will have significant adverse ecological & biodiversity impacts. It will not be sustainable or compliant with current legislation and approved planning policy. Discussion is required with the Planning Authority.
- **AMBER.** Caution. The proposals as conceived would have substantial negative impacts and cannot achieve “No Net Loss to Biodiversity” and “Biodiversity Net Gain” outcomes unless changes are made to avoid, mitigate/restore or, as a last resort, compensate for the ecological impacts, and introduce habitat and species enhancements. With such changes and subject to pre-application agreement with the Planning Authority, the project is considered likely to be feasible, however.
- **GREEN.** On present information, the proposals are expected to have no or only minor adverse impacts on ecology & biodiversity, and some net gains. In terms of ecology, the project can proceed providing all the recommendations are met, enforced and monitored.

DECEMBER 2024  
7272/Haud

Bank House Martley Worcester WR6 6PB.  
United Kingdom

T +44 (0)1886 888445  
E [nature@bettsecology.com](mailto:nature@bettsecology.com)  
[www.bettsecology.com](http://www.bettsecology.com)

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## Preliminary Ecological Appraisal

| 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 <sup>th</sup> of December 2024.                                      |

| REPORT CONTROL             |               |
|----------------------------|---------------|
| General Report Information |               |
| Date report issued         | January 2025  |
| Contract manager           | Natalie Loben |

### Report Version Control

| Version | Date       | Author      | Description        |
|---------|------------|-------------|--------------------|
| 1.0     | 09/01/2025 | Sean McMinn | Draft created      |
| 1.0     | 25/02/2025 | N Loben     | Document finalised |

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### REPORT TITLES – AN EXPLANATORY NOTE.

PEA of a site is exactly that: an examination of a defined area that includes a walk-over to provide a reliable basic reference for clients. The terminology for reports varies between practitioners. Please note that the old Phase 1 habitat codes are replaced by the newer UK Habitat Classification (UKHab) and “Phase 1” is being phased out as a report title.

For more extensive or ecologically complex sites, please be aware that an EcIA - Ecological Impact Assessment and/or other more detailed examinations may be required, and please remember that, in any case, all basic surveys may identify matters that require more thorough investigation. PEAs may not be sufficient for a formal Planning Application.

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## INTRODUCTION

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As almost all ecological surveys relate to a planning application, it is useful to consider our work in this context. British Standard 42020: 2013 *Biodiversity. Code of practice for planning and development* is helpful in this respect as it makes recommendations in the five typical stages of a planning application:

- Stage 1 (pre-application) – biodiversity in project design, the mitigation hierarchy (avoidance, adequate mitigation, or as last resort compensation), the impacts with constraints and opportunities, proportionality, surveys and reports;
- Stage 2 (validation, registration) – ensuring submitted information is sufficient;
- Stage 3 (decision making) – consultation, further information if needed, resolving issues;
- Stage 4 (determination) – setting deliverable Conditions, obligations if not covered by Conditions, additional consents that may be needed;
- Stage 5 (implementation) – protecting wildlife/biodiversity during construction, long term management and monitoring.

Please also remember that Biodiversity Net Gain (BNG) is now mandatory for most development projects (see main text below indicating if this is a mandatory BNG project).

We are often only contacted after a project has been designed, which can be costly and problematic if biodiversity has not been sufficiently considered, especially since BNG is now mandatory in many cases. We always ask clients to contact us at the very earliest stage of a project, preferably when options for alternative sites are available. This can save significant costs and delays. We can and do assist with all five stages. The PEA is primarily confined to Stages 1 and 2 but, subject to any more detailed investigations that may be required, we can provide text suitable for incorporation as Conditions where relevant and we can offer assistance in negotiating, writing and discharging them. When appropriate, as is commonly the case to ensure the overarching aim of No Net Loss but rather Net Gains to Biodiversity, we can take full responsibility for all long-term ecological management and monitoring as an exclusive service through our Estates division.

## WORK NEEDED FOR COMPLIANCE AS REVEALED BY THE SURVEY

| REQUIRED FURTHER WORK (PROTECTED SPECIES & HABITATS)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| Is further work needed to eliminate doubt regarding presence of notable/protected habitats or notable, protected or invasive species, or impacts on ecosystem services?                                                                                                                                                                                                                                                                                                                                                                                | YES                                                                                                                  |
| Work required if "yes":                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Reason                                                                                                               |
| The proposed development area will require the removal of one to three dead trees that have been identified as having potential bat roosting features. It is recommended that these trees are examined first by a suitably qualified bat ecologist and that any felling is undertaken in stages and under the supervision of a bat ecologist.                                                                                                                                                                                                          | Compliance with the law regarding bats and possible contravention of the Wildlife & Countryside Act 1982 as amended. |
| Undertake site clearance outside the bird nesting season (usually taken as February to September inclusive in this part of Britain). If this is unavoidable, pre-clearance inspection by a suitably experienced ornithologist will be required to identify whether any nests are present, and ensure appropriate action is taken.                                                                                                                                                                                                                      | Compliance with the law regarding nesting birds and Wildlife & Countryside Act 1982 as amended.                      |
| To avoid the risk of infringement of regulations, conduct a pre-clearance search of all areas of the site using suitably qualified ecological scientists under a Betts Method Statement or one formally pre-agreed by us immediately prior to site stripping to move any vulnerable taxa to safety or allow other necessary precautions to be taken prior to the commencement of development activity.                                                                                                                                                 | Prevention of cruelty, maintaining best practice.                                                                    |
| If there are any steep-sided excavations created during construction, please ensure they are covered overnight or provided with ramps to prevent any vulnerable animals becoming trapped. Re-fill such excavations as soon as feasible. Also, take care to seal/cover over open pipes, tanks, materials/rubble piles, bonfire stacks or other features that may be a danger to wildlife taking shelter/hibernating/ <i>etc.</i>                                                                                                                        | Prevention of cruelty, maintaining best practice.                                                                    |
| Avoid unnecessary negative impacts of new lighting at night, e.g. on bats, invertebrates, plants, night sky. Minimise the hours when lighting is used, avoid "spillage" by using directional down-lighting, reduce brightness of necessary illumination and keep light from shining on bat roost entries, mammal holes, <i>etc.</i> There are tracts of broad-leaved woodland bordering the east boundary of the site that will benefit from a specifically designed lighting scheme to reduce any potential negative impacts on these adjacent areas. | Reducing ecological impact and compliance with National Planning Policy Framework.                                   |
| Generally, retain habitats and features of manifest ecological interest and wildlife value such as nectar and fruit bearing plants (seeking further advice from us if uncertain) within the development proposals. Create new wildlife habitats appropriate to the site's context, e.g. through the use of vertical loggeries or other log piles (using felled trees), "wild" corners and native planting, bee banks, ponds, <i>etc.</i> ; install one bird box, one bat box and one invertebrate box (on                                              | Best practice and compliance with government policy on biodiversity protection and enhancement.                      |

## Preliminary Ecological Appraisal

| REQUIRED FURTHER WORK (PROTECTED SPECIES & HABITATS)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <p>new/existing buildings) of mixed designs and incorporate these into the project's landscape design scheme. (We can provide specific recommendations for models and siting on request, but they must be of good quality and durable.) Bat and bird boxes must be inspected annually and replaced when needed (usually after ten years or when full in the case of invertebrate boxes).</p> <p>Permeability for hedgehogs commuting through the landscape should be incorporated within the development.</p> <p>It is recommended that a Habitat Enhancement Plan (HEP) is created across the whole site to ensure best practice and compliance with government policy on biodiversity protection and enhancement.</p> |  |

| REQUIRED FURTHER WORK FOR GENERAL REGULATORY & GOOD PRACTICE COMPLIANCE                                                                                                                                                                                                                                                                                                                         |                                                                                                                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| Is further work recommended to observe ecological best practice and/or planning policy as recognised by the various statutory authorities at local, regional, national or international levels as may be applicable (click to enter the specific policies' references if required here)?                                                                                                        | YES                                                                                                                                  |
| <u>Work required if "yes":</u>                                                                                                                                                                                                                                                                                                                                                                  | <u>Reason</u>                                                                                                                        |
| Use native planting (preferably of local origin and reflecting local botany) wherever feasible in all landscaping. Where exotic species are planted, always avoid invasive species and choose those with wildlife value such as for nectar or shelter. (A list of species can be provided by us if needed.)                                                                                     | Biodiversity enhancement and helping to assure Biodiversity Net Gain and no net loss.                                                |
| Embody Green Infrastructure protocols in landscaping and ensure ecological linkage out from and into the site. (Please ask us if you require further details.) Please ensure we are provided with the proposed landscape planting plan to verify compliance with Green Infrastructure, Pollinator Policy and Biodiversity Net Gain.                                                             | Ecological connectivity and continuing biodiversity protection/enhancement.                                                          |
| Always retain mature trees and established native hedgerows on site and at the periphery by designing around them. Protect trees in line with BS5837 and do not remove ivy, mistletoe, standing dead wood, snags or rot unless there is a clear and material safety risk or presence of a serious pathogen. (Ask for advice on pathogens from a qualified silvicultural ecologist if in doubt.) | Tree and biodiversity protection; BS5837: 2012 <i>Trees in relation to design, demolition and construction</i> .                     |
| Except on high-value grassland, heath or wetland, plant as many native trees as possible. Ask us for advice.                                                                                                                                                                                                                                                                                    | To combat climate change by capturing CO <sub>2</sub> .                                                                              |
| Ensure that the establishment, sufficient provision, on-going maintenance and monitoring of all biodiversity and ecological elements of the site or associated Green Infrastructure design, "green space" and any wetland and riparian areas associated with sustainable drainage are applied through a permanent and monitored Management Plan for Biodiversity                                | Essential to ensure delivery and ongoing verification of biodiversity standards (BS42020, National Planning Policy Framework, etc.). |

## Preliminary Ecological Appraisal

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| REQUIRED FURTHER WORK FOR GENERAL REGULATORY & GOOD PRACTICE COMPLIANCE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| (MPB). Make certain the MPB is written, approved and implemented before site work begins so that impacts on ecological receptors are avoided/ mitigated/ compensated as appropriate.                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                         |
| Ensure that the "carbon footprint" and measures to combat climate change (see also tree planting above) in all aspects of the project and its future operation are compliant with current best practice. This should include taking appropriate steps to avoid or reduce the use of fossil fuels, minimising ground disturbance to conserve soil biology/ecology, employing scientifically sound carbon offset/CO <sub>2</sub> sequestration and instating renewable energy technologies. Ensure the measures agreed are quantified, independently verified and monitored. | To follow government and international policy on climate change and soils conservation. |

**Please note that Betts have reservations about using Biodiversity Metrics alone for calculating BNG and no responsibility is accepted for the use or results of any such metric in isolation. Clients must please be aware of the limitations of the metrics' use and procedures, and that results of metrics usage may be misleading or lack relevance to the circumstances of the project and site ecology. These include the problems of the metric using habitats as a proxy for biodiversity, oversimplification of ecology and ecology's tendency to be counterintuitive. Care is particularly required where the metrics outcome is segregated from, or conflicts with, site survey and fieldwork results and our recommendations.**

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## RESULTS – WHAT WE FOUND

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### Objectives

The objectives of this commission were to:

1. To conduct a Preliminary Ecological Appraisal of the site; and identify notable factors/features;
2. To prepare a 'Phase 1' Habitat Map with Target Notes to recognised standards;
3. To produce a written summary of results and provide appropriate recommendations for mitigation, biodiversity protection/ enhancement, *etc.*
4. To undertake a Public Records Search from local data repositories.

### Methods and Limitations

The site was examined using appropriate methods generally following the current guidance from the Chartered Institute of Ecology and Environmental Management<sup>1</sup> and the UK Habitat Classification<sup>2</sup>, with further reference to British Standards such as 42020<sup>3</sup> and 8683<sup>4</sup> as appropriate or practicable.

It should be noted that, whilst the investigation of the site was appropriately intensive within the intended framework of the commission, and we feel it is unlikely that significant matters have been overlooked, a single visit will inevitably miss species not apparent on the date of survey by reason of seasonality, mobility, habits or chance. The month of December is outside the optimal survey period for many taxa of nature conservation interest in this part of the United Kingdom

It should always be recalled that wildlife surveys of the kind required for planning and development, or similar project purposes are seldom granted sufficient time or resources to examine non-vascular plants, invertebrates or fungi in great detail, yet these are the fundamental elements of ecosystems that provide the niches and habitats for larger fauna to exploit. Fungal mycelia in soil and associated with roots and decaying organic material are of exceptional importance in healthy ecosystem function, biological sustainability, biodiversity and as a carbon sink. It should always be borne in mind that land-use change, ground disturbance and intensive agriculture/forestry will usually have a significant adverse effect on fungal communities. This should be considered when appraising any project and

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<sup>1</sup> The Chartered Institute of Ecology and Environmental Management guidelines which are regularly updated, and we use our best endeavours to observe.

<sup>2</sup> The UK Habitat Classification and User Manual, see <https://ukhab.org/>.

<sup>3</sup> British Standards Institute (2013). *British Standard 42020: 2013 Biodiversity. Code of practice for planning and development*. British Standards Institute, London, UK.

<sup>4</sup> British Standards Institute (2021) *British Standard 8683 Process for designing and implementing Biodiversity Net Gain* British Standards Institute, London, UK.

appropriate avoidance/mitigation prescribed. In an ideal world, all surveys would include results of full sampling of vascular and non-vascular plants, micro- and macro-invertebrates and mycological status at individual, population and community levels. As that involves skills, time and expense well beyond what is available, we ask readers of our general survey reports to understand that we do consider the larger species we record in their wider ecosystem context and take into account the impacts of proposals at an ecosystem level when prescribing avoidance, mitigation, enhancement and/or compensation.

## Habitats Plan<sup>5</sup>



7. Based upon UKHAB © UKHAB LTD, under licence. No onward licence implied or provided. All rights reserved [<https://ukhab.org/register/>]. UKHAB derived outputs are permitted for commercial use. Please note: this plan is intended only to indicate the approximate location of features and should therefore, not be treated as an accurate scale plan.

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## Results Table

| ITEM                                                                                                                                               | OBSERVATIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Habitats &amp; Vegetation</b><br>(NB. Please be aware that several designated habitat types and many plants enjoy legal protection in Britain.) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| General description                                                                                                                                | <p>The proposed communications tower is located at the northern edge of the town of Burgess Hill and set in a semi-rural landscape of residential properties, farmland, woodland and hedgerow. The site is bordered on the east by a railway line, and modified grassland with scattered trees to the north south and west.</p> <p>The development site is very small (15mx 10m) and is mostly of modified/maintained grassland and bramble <i>Rubus fruticosus</i>.</p> |
| Target Note TN1                                                                                                                                    | Area of bramble scrub that provides nesting bird habitat.                                                                                                                                                                                                                                                                                                                                                                                                                |
| Target Notes 2-3                                                                                                                                   | Dead trees that have some potential for roosting bats.                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Target Note 4                                                                                                                                      | Pathway running along the site from north to south.                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Statutory designations (on/near)                                                                                                                   | The public records search revealed one site of Special Scientific Interest (SSSI), Ditchling Common, within the search area and one Local Nature Reserve (LNR) Bedelands Farm. The search also revealed the following section 41 habitats within the search area: reedbed, traditional orchard, deciduous woodland, ancient woodland and ghyll woodland.                                                                                                                 |
| Non-statutory designations (on/near)                                                                                                               | The public records search also revealed the following Local Wildlife Sites (LWS) of Non-Statutory Importance within 2km of the site: L57 - St Georges Retreat, Mo7- Burgess Hill Railway Lands, M16- Great Wood and Copyhold Hanger, M20- Bedelands and M48- Keymer tile works, which is a Local Geological Site (LGS).                                                                                                                                                  |
| Notable hedgerows, woodland or scrub                                                                                                               | None within the site boundary. There is a relatively small area of scrub but not considered notable in this context.                                                                                                                                                                                                                                                                                                                                                     |
| Ecologically notable trees (e.g. veteran, wildlife significant) <sup>6</sup>                                                                       | There are two or three dead trees within the proposed development area that have some potential for roosting bats, with holes and split bark that are potential bat roosting features.                                                                                                                                                                                                                                                                                   |
| Ponds/water courses                                                                                                                                | There are no ponds or watercourses on site. The nearest water bodies are >300-400m from the proposed development site.                                                                                                                                                                                                                                                                                                                                                   |
| Notable communities                                                                                                                                | None.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Notable vascular plants                                                                                                                            | None.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Notable bryophytes/algae                                                                                                                           | None.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

<sup>6</sup> Please note that we do not check TPO status as this is a landscape/amenity planning classification.

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| ITEM                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | OBSERVATIONS                                                                                                                                                                                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Notable lichens                                                                                                                                                                                                                                                                                                                                                                                                                                                            | None.                                                                                                                                                                                                                        |
| Notable fungi                                                                                                                                                                                                                                                                                                                                                                                                                                                              | None.                                                                                                                                                                                                                        |
| Other notable habitats/vegetation                                                                                                                                                                                                                                                                                                                                                                                                                                          | None specifically on site.                                                                                                                                                                                                   |
| Features that should be retained                                                                                                                                                                                                                                                                                                                                                                                                                                           | Trees and scrub where possible.                                                                                                                                                                                              |
| <b>Mammals</b><br>(NB. Several species and their habitats have very strict protection in law.)                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                              |
| Badger                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | No evidence of badger activity was recorded within the area surveyed. It is considered likely they occur in the wider area.                                                                                                  |
| Otter                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | No suitable habitat on site for this species.                                                                                                                                                                                |
| Other mustelids                                                                                                                                                                                                                                                                                                                                                                                                                                                            | None recorded.                                                                                                                                                                                                               |
| Bats                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | There are two or three dead trees within the development area that have some potential to support roosting bats in holes and split bark. The public records search revealed eight species of bat within the 2km search area. |
| Water vole                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | No suitable habitat for this species on site.                                                                                                                                                                                |
| Common or hazel dormouse                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Very limited suitable habitat on site (confined to patch of bramble) therefore considered unlikely.                                                                                                                          |
| Deer                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | None recorded.                                                                                                                                                                                                               |
| Hedgehog                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | May occur on site and in adjacent habitats of grassland and gardens. There are public records of hedgehogs within the 2km search area (for full results see table in Public Records Search Results section below).           |
| Shrews                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | No suitable habitat on site.                                                                                                                                                                                                 |
| Others                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | None.                                                                                                                                                                                                                        |
| <b>Birds</b><br>(NB. With the exception of derogated pest or very common species (check current list as it changes), the Wildlife and Countryside Act (1981 and amendments) gives protection to all wild birds in Britain from killing, injuring or taking as well as taking, damaging or destroying nests in use or being built, and taking or destroying eggs. Many species are also protected by international statutes to which Britain is a signatory. <sup>7</sup> ) |                                                                                                                                                                                                                              |
| Red list                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | No red list species recorded during the survey.                                                                                                                                                                              |

<sup>7</sup> Please also see [www.rspb.org.uk/wildlife/birdguide/status\\_explained.aspx](http://www.rspb.org.uk/wildlife/birdguide/status_explained.aspx) and [www.bto.org/sites/default/files/u38/downloads/home-news/2011-11/SUKB%202011%20final.pdf](http://www.bto.org/sites/default/files/u38/downloads/home-news/2011-11/SUKB%202011%20final.pdf) for red and amber lists etc., and explanations.

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| ITEM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | OBSERVATIONS                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Amber list                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | None.                                                                                                                                               |
| Active nests                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | None recorded. Survey took place outside of nesting bird season.                                                                                    |
| Other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Numerous Ring-necked parakeets in the local areas and flying over the site.                                                                         |
| Comments on ornithology                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N/A.                                                                                                                                                |
| <b><u>Herpetofauna</u></b><br>(NB. The barred grass snake, slow-worm, viviparous (common) lizard and adder (viper) are all protected from intentional killing or injury under Schedule 5, Section 9(1), of the Wildlife and Countryside Act as amended/reinforced by the CROW Act 2000. They are also protected under Schedule 5, Section 9(5) which prohibits selling, offering for sale, possessing or transporting for the purpose of sale, or advertising for sale, any live or dead animal, or any part of, or anything derived from the species. Other rarer species and their habitats have stricter protection.) |                                                                                                                                                     |
| Adder                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | No suitable habitat for this species on site. There are public records within the 2km search area.                                                  |
| Barred grass snake                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | No suitable habitat for this species on site. There are public records within the 2km search area.                                                  |
| Slow-worm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | No suitable habitat for this species on site. There are public records within the 2km search area.                                                  |
| Common lizard                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | No suitable habitat for this species on site. May occur along the adjacent railway embankment. There are public records within the 2km search area. |
| Rarer reptiles                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Not found in this area.                                                                                                                             |
| 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.                                                                                                                                               |
| <b><u>Fish</u></b><br>(NB. Various levels of legal protection.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                     |
| Significant fishery                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | None.                                                                                                                                               |
| Bullhead                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | None.                                                                                                                                               |
| Shad                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | None.                                                                                                                                               |
| Lampreys                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | None.                                                                                                                                               |
| Salmonids                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | None.                                                                                                                                               |

## Preliminary Ecological Appraisal

### Macro-invertebrates

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<sup>8</sup>. Several species enjoy legal protection.

| Ref.                                                                                                                                           | Habitat                                                                                                                               | Designations A-E (list all) if habitat present on site |
|------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| 1                                                                                                                                              | Decaying wood (all types, standing and lying, snags, sap runs, brash, debris, <i>etc.</i> )                                           | B (present)                                            |
| 2                                                                                                                                              | Rotational management (may be planned or incidental; for nature conservation or other reasons)                                        | C (absent)                                             |
| 3                                                                                                                                              | Nectar/pollen resources (estimate from site's botany)                                                                                 | C (Poor)                                               |
| 4                                                                                                                                              | Wet & mesic substrata (riparian, marsh, fen, bog, mud, flushes, springs, seasonally inundated, <i>etc.</i> )                          | E (absent)                                             |
| 5                                                                                                                                              | Open water (rivers, lakes, streams, ponds, ditches, <i>etc.</i> )                                                                     | E (absent)                                             |
| 6                                                                                                                                              | Habitat mosaics and patchworks (include those on brownfield/formerly developed sites)                                                 | C (absent)                                             |
| 7                                                                                                                                              | Still air with insolation (suntraps and still-air microclimates in open situations)                                                   | C (absent)                                             |
| 8                                                                                                                                              | Still humid air (humid still-air microclimates in sheltered and shaded situations)                                                    | C (absent)                                             |
| 9                                                                                                                                              | Connectivity/corridors (ecological connectivity between the site and external habitats - see also note below about adjacent habitats) | B (present)                                            |
| 10                                                                                                                                             | Ecoclines (graded transition between two or more broad habitats)                                                                      | B (absent)                                             |
| 11                                                                                                                                             | Bare Earth (unshaded bare/sparsely vegetated well-drained substratum, irrespective of soil type)                                      | E (absent)                                             |
| Are there any examples of A, B or C adjacent to the survey site or near enough that they will require protection during and after development? |                                                                                                                                       | No                                                     |

  

| ITEM               | OBSERVATIONS |
|--------------------|--------------|
| Other notable fish | None.        |

### Species

|                            |       |
|----------------------------|-------|
| Crayfish                   | None. |
| Roman snail                | None. |
| Other molluscs             | None. |
| Lesser silver water-beetle | None. |

<sup>8</sup> Adapted from Dobson, J. & Fairclough, J. (2021). Rapid Assessments of the Potential Value of Invertebrate Habitats. *In Practice*, 112, pp 44-48.

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|                                            |                                                     |
|--------------------------------------------|-----------------------------------------------------|
| Stag beetle                                | None.                                               |
| Other notable beetles                      | None.                                               |
| Butterflies/moths                          | None recorded on the day of survey (out of season). |
| Bees, wasps, flies, <i>etc.</i>            | None recorded on the day of survey.                 |
| Dragonflies/damselflies                    | None recorded on the day of survey.                 |
| Other notable entomological spp or groups  | None.                                               |
| Notable invertebrate habitat               | None.                                               |
| Overall assessment for macro-invertebrates | Poor on site.                                       |

|                                                                                                                                                                                                                                      |                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| <b>Invasive alien species (IAS)<sup>9</sup> and pathogens</b><br>(There are an increasing number of these being listed by authorities. More and more are becoming subject to regulatory control that carries significant sanctions.) |                 |
| IAS (plants) (Wildlife & Countryside Act Article14, Schedule 9.)                                                                                                                                                                     | None.           |
| Weeds Act natives (common ragwort, creeping and spear thistles, curled and broad-leaved docks)                                                                                                                                       | Spear thistle . |
| Other exotic plants that may cause problems.                                                                                                                                                                                         | None.           |
| Invasive animals (signal crayfish, killer shrimp, oak processionary moth, harlequin ladybird, zebra mussel, grey squirrel, <i>etc.</i> )                                                                                             | None.           |

<sup>9</sup> Sometimes referred to as “non-native species”.

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|                                                                                                              |                   |
|--------------------------------------------------------------------------------------------------------------|-------------------|
| <i>Phytophthora ramorum</i> and other serious plant diseases/pathogens (ash dieback, sudden oak death, etc.) | None.             |
| <u>Policy</u> <sup>10</sup>                                                                                  |                   |
| Are there any known conflicts with local planning biodiversity policy (if so, please describe)?              | None anticipated. |
| Are there any known conflicts with national planning biodiversity policy (if so, please describe)?           | None anticipated. |
| Are there any known conflicts with international biodiversity policy (if so, please describe)?               | None anticipated. |

| ECOSYSTEM SERVICES                                                                                                             | YES/NO | COMMENT/ACTION REQUIRED IF "YES" |
|--------------------------------------------------------------------------------------------------------------------------------|--------|----------------------------------|
| Has the survey revealed, in the context of the proposed project, any likely significant adverse impacts on Ecosystem Services? | No     |                                  |

| GEOLOGICAL CONSERVATION<br>(Geodiversity is a material planning consideration)                                                                               | YES/NO | ACTION REQUIRED IF "YES"                                                                                                                                                            |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Are there any features of geological importance on the development site?                                                                                     | No.    |                                                                                                                                                                                     |
| Are there any features of geological importance adjacent to the development site or that might be affected by the development (during or post construction)? | No.    | Keymer Tile works, a Local Geological Site, is 100m north at the nearest point. The proposed communications mast development is unlikely to have any negative impacts on this site. |

<sup>10</sup> It is important that projects incorporate relevant elements of Green Infrastructure Planning (please see [www.naturalengland.org.uk/ourwork/planningdevelopment/greeninfrastructure/default.aspx](http://www.naturalengland.org.uk/ourwork/planningdevelopment/greeninfrastructure/default.aspx))  
 "Green Infrastructure (GI) is a strategically planned and delivered network of high-quality green spaces and other environmental features. It should be designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits for local communities. Green Infrastructure includes parks, open spaces, playing fields, woodlands, allotments and private gardens."

## Preliminary Ecological Appraisal

| GEOLOGICAL CONSERVATION<br>(Geodiversity is a material planning consideration)                                                                                                                        | YES/NO | ACTION REQUIRED IF "YES" |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------------------------|
| Are there any significant negative impacts predicted on soils e.g. erosion (especially light or organic (peaty) soils), compaction, contamination, loss of good agricultural soil, waterlogging, etc. | No.    |                          |

| MANDATORY BIODIVERSITY NET GAIN                                                                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------|
| The client informed Betts that the scheme falls under a GPDO application therefore a BNG survey report/calculations are not required. |

## PUBLIC RECORDS SEARCH RESULTS

The Public Records Search provided by Sussex Biodiversity Centre Record Centre (SxBRC) for a radius of 2km from the centre of the proposed development site on land north of Leyland Grange Close, Burgess Hill, RH15 0RZ.

| <b><u>PUBLIC RECORDS SEARCH</u></b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                |
|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| <b><u>Source</u></b>                | <b><u>Data/Response</u></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b><u>Betts comment</u></b>                                                    |
| <u>SxBRC</u>                        | <p>The public records search revealed one site of Special Scientific Interest (SSSI), Ditchling Common, within the search area and one Local Nature Reserve (LNR) Bedelands Farm. The search revealed the following Section 41 habitats within the search area: reedbed, traditional orchard, deciduous woodland, ancient woodland and ghyll woodland.</p> <p>The public records search also revealed the following Local Wildlife Sites (LWS) of Non-Statutory Importance within 2km of the site: L57 - St Georges Retreat, Mo7- Burgess Hill Railway Lands, M16- Great Wood and Copyhold Hanger,</p> | The development proposal is unlikely to have a negative impact on these areas. |

| <b><u>PUBLIC RECORDS SEARCH</u></b> |                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                       |
|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b><u>Source</u></b>                | <b><u>Data/Response</u></b>                                                                                                                                                                                                                                                                      | <b><u>Betts comment</u></b>                                                                                                                                                                                                                                                                           |
|                                     | M20- Bedelands and<br>M48- Keymer tile works, which is<br>a Local Geological Site (LGS)                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                       |
| <u>SxBRC</u>                        | The public records search revealed eight specifically identified species of bat within the 2km search area, Noctule, Serotine, Common and Soprano Pipistrelle, Whiskered/Brandt's, Natterers, Daubentons and Brown Long-eared bats. The most recent records are from 2023 of Common Pipistrelle. | There are dead trees within the proposed compound area that are to be removed. Some of these trees exhibited potential bat roosting features such as loose bark and holes within limbs or trunks.<br>There is moderate to good bat foraging to the north, and along the corridor of the railway line. |
| <u>SxBRC</u>                        | The public records search revealed 47 records of Hazel Dormouse within the search area, the most recent from October 2023.                                                                                                                                                                       | The habitat on the proposed development site is sub-optimal for this species being dominated by modified/maintained grassland with a small patch of bramble scrub.                                                                                                                                    |
| <u>SxBRC</u>                        | The public records search revealed 83 records of West European Hedgehog within the 2km search radius. The most recent in November 2023.                                                                                                                                                          | There is sub-optimal habitat on site for this species within the modified grassland and bramble scrub habitat.                                                                                                                                                                                        |
| <u>SxBRC</u>                        | There are eleven records of Common Lizard the most recent in 2020, 47 records of Slow Worm the most recent in 2016, four records of Adder, the most recent in 2002 and 31 records of Grass Snake the most recent in 2023 within a 2km radius.                                                    | The habitats on site are maintained /modified grassland that is generally poor for all these species. There is some suitable adjacent habitat (offsite) along the railway embankment that may support Common Lizards.                                                                                 |
| <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.                                                                                                                                                        |

The full Public Records Search from Sussex Biodiversity Records Centre is available on request.

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## CONCLUDING REMARKS

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Providing the requirements noted herein are fully implemented and followed through, subject to the results of the necessary further work relating to protected species (see report content for details) and satisfactory execution of specified avoidance, enhancements, mitigation and/or compensation, there are no obvious ecological counter indications to the proposed project at this stage. Indeed, the recommended ecological protection and enhancements may be expected to deliver planning & biodiversity gains, assuring there is No Net Loss to Biodiversity and no unacceptable adverse impact on Ecosystem Services.

It is essential that the ecological recommendations of this report are securely incorporated as formal Conditions within any planning consent the Local Authority is minded to grant, and that their implementation and ongoing care are verified and monitored.

### Notes

Please note that there is complex and strict legislation protecting many species and habitats. Full details are available on the web sites of Defra and the various statutory authorities, some of which now have direct powers of enforcement. If you are in any doubt about the status of species or habitats on your site, please be sure to contact us before undertaking any site work. You should also make sure that you are aware of, and have allowed for, all national and local planning policies relating to wildlife and nature conservation before proceeding.

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## PHOTOGRAPHS

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All photographs were taken on the 16<sup>th</sup> of December 2024

View south over site of grassland



Bramble scrub



### Dead tree with bat roosting potential



### View north over site



Dead tree within compound area



Dead tree within compound area



## IMPORTANT

Please be aware that, because the natural environment is dynamic, ecological reports generally have a limited period of currency. Many statutory authorities now regard one year as the maximum time that should elapse before a report will need to be updated: occasionally it may be longer, but it may also be less. Where a statutory wildlife licence is to be applied for, a walk-over of the site should be carried out **within three months** of an application being submitted to check that the habitats have not changed significantly since the survey was carried out.

Betts is a scientific practice. Any information relating to legal matters in this report is provided in good faith but does not purport in any way to give any advice on or interpretation of the law whatsoever. Professional legal advice should always be sought. Any designs, specifications, advice, suggestions, or comments written or verbal relating to construction or supervision of building-related work of any kind are provided for consideration only and under no circumstances are to be interpreted as provision of design, management or supervision *sensu* Construction (Design and Management) Regulations or similar regulations in force.

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## CAPABILITY and QUALITY ASSURANCE

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*Founded in 1985 to provide high quality professional services to meet an increasing market demand in applied environmental sciences, the Practice stems from the original Betts family business which was established in 1760 for the refining and recycling of high value industrial wastes and mineral ores. Betts thus offer an unusual blend of technological and practical expertise in a range of environmental disciplines, allied particularly to the biological conservation legislation and biodiversity policies of recent years. Contracts undertaken cover a wide spectrum of projects at local, national and international levels in the construction, extractive, agricultural, leisure, energy and general industrial sectors. Scientific staff belong to appropriate professional institutes by whose codes of practice they abide. Due consideration of the British Standards on Biodiversity is included in relevant work and applied where appropriate.*

### **Sean McMinn**

Sean McMinn has been working as a professional Ornithologist and Ecologist for over thirty years both in the UK and overseas and was a consultant Wildlife Inspector for Defra's Global Wildlife Division for 17 years. He has a particularly diverse knowledge of British Fauna and Flora. Sean has been a regular contributor to various magazines, journals and periodicals throughout this period and is a regular advisor on conservation and legislative issues for both government and non-government organizations. Sean is also a holder of several protected species' licences that includes bats, great crested newts and several Schedule 1 bird species.

*NB. Please again be aware that site surveys inevitably miss species not apparent on the date of visit(s) by reason of seasonality, mobility, habits or chance. Results are indicative and given in good faith, but they are not a guarantee of presence or absence of any particular taxa.*

*Please note that this report is a Preliminary Ecological Appraisal of factors and features that may be significant for regulatory compliance and biodiversity policies relating to change of use or other disturbance. Such reports may not, on their own, contain sufficient information for a planning application and may require furthermore detailed study to assure compliance.*

**Betts Ecology Ltd**  
Bank House  
Martley  
Worcester WR6 6PB  
United Kingdom

T +44 (0)1886 888445  
E [nature@bettsecology.com](mailto:nature@bettsecology.com)  
And other offices

More information is available at [www.bettsecology.com](http://www.bettsecology.com)

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