

Genevieve Broad

Ecological Consultant

Place Services at Essex County Council

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25 September 2024

Our ref: UE0566

Dear Genevieve,

Application: DM/23/2610

Location: Land South Of Hanlye Lane Longacre Crescent Cuckfield West Sussex

Proposal: Residential development of 50 dwellings with vehicular and pedestrian access, car parking, open space, play space, landscaping and all other associated works

Further to your consultation advice issued on 19 September 2024, the below provides responses to the points raised in relation to the Proposed Development at the above site.

Roosting bats

We therefore request clarification as to whether Ground Level Tree Assessments have been undertaken on any other trees to be removed. This is necessary for the LPA to have certainty of likely impacts on bats prior to determination.

The Preliminary Ecological Appraisal¹ report included a ground level inspection for potential bat roost features on trees within the areas to be impacted by the Proposed Development. Any revisions to the layout or tree removals as the site design developed were examined to ensure no additional constraints in relation to bats roosting in trees arose. As such, it can be confirmed that all trees scheduled for removal were assessed for their bat roosting suitability. Furthermore, bat roosting within retained trees (if present) will be protected by the implementation of a sensitive lighting scheme to avoid being displaced by increased lighting during both the construction and operational phase.

Purple emperor and Stag beetle

We therefore request clarification as to whether these Priority species were also the subject of the invertebrate survey.

The Protected Species Report² focussed upon the brown hairstreak due to the presence of historical records and the potential loss of egg-laying habitat – blackthorn scrub. As such, it was deemed necessary to investigate the potential for the site to be a stronghold for this species and if so, assess the impact of the Proposed Development. Notwithstanding this focus upon brown hairstreak other invertebrate species were

¹ UEEC (2024a): *Land at Hanlye Lane, Cuckfield, West Sussex – Preliminary Ecological Appraisal.*

² UEEC (2024b): *Land at Hanlye Lane, Cuckfield, West Sussex – Protected Species Report.*

considered and broadly assessed for potential impacts. Further consideration of the two species highlighted are as follows:

Purple emperor – there is likely potential around the periphery oak trees for aggregating and patrolling males (good wood edge structure with oak trees and scrub). An area of goat willow, which can provide potential larvae sites, will be lost in the north-west of the site (tree group 38). However, the majority of peripheral habitat will be retained and buffered, including mature oak trees in these areas.

Stag beetle – there is potential suitability around the edges, particularly along the southern boundary, although large accumulations of fallen deadwood were not noted. Areas of deadwood were noted along the mature oak tree line through the centre of the site, but these will be retained and in situ and protected.

Broadly speaking, the central areas which are impacted by the Proposed Development are not suitable for either purple emperor or stag beetle.

Biodiversity Net Gain

...further information is required for off-site measures to achieve, at the least, no net loss of biodiversity.

The client has approached various off-site habitat banks in anticipation of the need to compensate for the loss of biodiversity units as a result of the Proposed Development. It is appreciated that some certainty regarding the delivery of at least no net loss is required by the Local Planning Authority prior to granting permission for the application. However, entering into a binding agreement at this stage could result in abortive costs, particularly given that the client is awaiting further guidance from the Local Planning Authority of the level of off-site gains required. As such, a compromise at this stage would be for the client to provide evidence of their habitat bank searches, including the provision of quotes received, albeit with costs redacted. This will provide the Local Planning Authority with the confidence that units are available to be purchased when required.

We trust that this letter provides you with the detail you require with respect to the additional information requested. Should you have any queries or comments, or require any further advice for the site, please do not hesitate to contact me.

Yours sincerely,



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