



Date: 29 June 2026

Our ref: 15978

Steven King
Mid Sussex District Council
Oaklands Road
Haywards Heath
RH16 1SS

By email only:

Contains sensitive information

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Sussex District Council planning decisions with regard to potential ecological impacts from development.

Application: DM/26/0682
Location: Land At Hurst Farm Hurstwood Lane Haywards Heath West Sussex
Proposal: Reserved Matters Application Pursuant to Outline Planning Permission Mid Sussex District Council (MSDC) Reference: DM/25/1630, Lewes District Council (LDC) Reference: LW/2510707 at Hurst Farm, for appearance, layout, scale and landscaping only (additional ecology information received 28/05/2026).

Thank you for re-consulting Place Services on the above Reserved Matters application. Our previous response dated 21st April 2026 refers.

No ecological objection	☐
No ecological objection subject to attached conditions	☐
Further information required on European Protected Species (bats)	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐

Summary

Further to our comments dated 21 April 2026, we have reviewed the Ecology Technical Update (ACD Environmental, May 2026) submitted in response to our request for a further

ecology addendum to address the requirement of 'Condition 9: further supplementary ecological surveys' secured by the outline consent.

European Protected Species (bats)

We note from the Ecology Technical Update (ACD Environmental, May 2026) that tree T91, T92 and T93 (all mature Ash) have 'high' or Potential Roost Features for multiple bats (PRFs-M). Therefore, we highlight that these trees will require further assessment prior to any approval of this Reserved Matters application (4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023)). We also note that trees G114 (Goat Willow), T149 (Monterey Pine) and T155 (Sycamore) have PRFs for individual bats or 'low' potential. We therefore highlight that appropriate compensation for these trees will be required in advance of works to avoid loss of roost resource (Reason and Wray (2023) *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1*. Chartered Institute of Ecology and Environmental Management). We support the non-licensed Precautionary Working Method Statement for bats in Section 3.16 of the Ecology Technical Update (ACD Environmental, May 2026), which includes inspection of any affected trees by endoscope on the day and felling under the supervision of a licensed bat ecologist, as required in Table 6.3 of 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023).

As highlighted in our response dated 21st April 2026, the Landscape Strategy – Site wide Stage 3 (Terraforma) is blurred and cannot be read. Therefore, we would expect a finalised planting plan / schedules to be secured as part of the reserved matters application.

Additional comments:

Mandatory Biodiversity Net Gains

We note that the Biodiversity Assessment (RSK Biocensus, June 2023) has been submitted, indicating a loss of -37.94% habitat units, a loss of -9.31% linear hedgerow units and a loss of -61.54% watercourse units. We highlight that these losses are contrary to the Mid Sussex District Plan 2021-2039 DPN2, current legislation and national policy which all require an increase of 10% BNG.

European Protected Species (Hazel Dormouse)

We note that the Dormouse Technical Note (ACD Environmental, October 2025) found no evidence of Hazel Dormouse on site during surveys in July, August and September 2025 and concludes that this species is likely absent from the site. However, as there are nearby records for the species and there is suitable habitat on site, we support the implementation of the non-licensed Precautionary Method Statement for Hazel Dormouse in Sections 4.3, 4.4 and 4.5 of the Dormouse Technical Note (ACD Environmental, October 2025) and supported in Section 3.32 of the Ecology Technical Update (ACD Environmental, May 2026). This should be secured as part of any approval of this reserved matters application.

Please note that we have no comments on Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the [NatureSpace Partnership](#).

Protected Species (Badger and Reptiles)

Badger

We understand from the Ecology Technical Update (ACD Environmental, May 2026) that there is an outlier Badger sett in the east of the site which has been in recent use. Therefore, we support the mitigation measures for Badger in Sections 3.10, 3.11 and 3.12 of the Ecology Technical Update (ACD Environmental, May 2026), including the implementation of a 15m buffer zone around the sett and an update Badger survey prior to the commencement of works.

Reptiles

We also note that the Ecology Technical Update (ACD Environmental, May 2026) concludes that the habitats on site are still suitable for reptiles and therefore reptiles are still present on site. This supports the need for implementation of the Reptile Mitigation Strategy (ACD Environmental, September 2025) which we note confirms an exceptional population of Slow Worm on site in addition to low populations of Common Lizard and Grass Snake. Therefore, we support the identified receptor area adjacent to the east of the site and understand that this site has been assessed as a suitable site with sufficient carrying capacity for the translocated reptile populations. This provides certainty of likely impacts on reptiles to support any approval of this reserved matters application. We would therefore support the Reptile Mitigation Strategy (ACD Environmental, September 2025) in the discharge of Condition 6.

We note that the documents required for the following conditions have still not been submitted and look forward to reviewing the documents when they become available:

Condition 7: Landscape and Ecological Management Plan (LEMP)

Condition 8: Construction Environmental Management Plan (CEMP: Biodiversity)

Condition 10: Biodiversity Enhancement Strategy

Condition 26: Lighting Scheme for Biodiversity

Please do not hesitate to contact us if you have any queries in relation to this advice.

Sue Hooton CEnv MCIEEM BSc (Hons)

Principal Ecological Consultant

Place Services at Essex County Council



Place Services provide ecological advice on behalf of Mid Sussex District Council.

Please note:

This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

We are unable to respond directly to applicants/agents or other interested parties.

Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer at the relevant LPA, who will seek further advice from us where appropriate.

