Technical Note 02

Project: Land West of Turners Hill Road, Crawley Down (South of Huntsland)

Planning Ref: DM/25/0014, DM/25/0015

Date: April 2025

Consideration of Planning Consultation Response from Place Services (dated 24th March 2025)

1 Introduction

1.1.1 Aspect Ecology is advising Wates Developments in respect of ecological matters relating to Land West of Turners Hill Road, Crawley Down. Two sets of duplicate planning applications have been submitted at the site, relating to land to the south (application refs: DM/25/0014 and DM/25/0015) and north (DM/25/0016 and DM/25/0017) of Huntsland respectively.

1.1.2 Place Services, which provides ecological advice to inform Mid Sussex District Council, has provided planning consultation responses in relation to both sets of applications. This note provides consideration of the consultation response on the southern applications (DM/25/0014 and DM/25/0015) responding to the specific queries raised, namely on bats and biodiversity net gain (BNG).

2 Bats

2.1.1 The Place Services response notes that a number of trees were identified as supporting potential roost features for bats or requiring further assessment, and requests clarification as to which trees will be removed under the development. Where trees are to be removed, the response notes that further assessments must be undertaken in accordance with the Bat Survey Guidelines (Bat Conservation Trust, 2023), and that inspections should take place prior to determination to give the LPA certainty of likely impacts on protected species.

2.1.2 An assessment of trees for bat roosting potential has been undertaken as detailed within the Ecological Appraisal, with the results set out at Table 5.2 and a discussion of trees affected under the proposals at paragraph 5.3.19. An expanded summary table is provided below to provide clarification of proposed tree removals.

Table 1. Tree assessment results and proposed removals under applications DM/25/0014 and DM/25/0015

Tree Ref.	Species	Assessment and potential roosting features	Summary	Affected under proposals?
T1 (5163)	Oak	Mature Oak with deadwood on westward facing limb, multiple other sections of dead limbs which are producing collars and potentially crevices.	PRF-M	Retained – adjacent access to be installed above soil level to avoid tree impacts
T2 (5162)	Ash	Multi-stem Ash with relatively narrow stems only 20-30cm diameter, some Ivy cover.	Negligible potential	Removed
T3 (3018)	Oak	Mature Oak with several dead protruding limbs	PRF	Retained – adjacent access to be installed above soil level to avoid tree impacts

Tree Ref.	Species	Assessment and potential roosting features	Summary	Affected under proposals?
T4 (3012)	Beech	Young multi-stem Beech with some diseased growth.	PRF	Retained – adjacent access to be installed above soil level to avoid tree impacts
T5 (5091)	Ash	Semi-mature Ash with a single rot hole evident.	PRF	Retained – adjacent access to be installed above soil level to avoid tree impacts
T6 (5114)	Ash	Semi-mature Ash with dense Ivy.	PRF	Retained – adjacent access to be installed above soil level to avoid tree impacts
T7 (713)	Ash	Some minor deadwood noted.	FAR	Retained – located within retained hedgerow corridor
T8 (5358)	Oak	Mature Oak with some deadwood features.	PRF	Retained – located at site boundary
T9 (5357)	Oak	Large mature Oak. No features evident but could support some potential given size/age.	FAR	Retained – located at site boundary
T10 (5346)	Oak	Large mature Oak. No features evident but could support some potential given size/age.	FAR	Retained – located within open space
T11 (5345)	Oak	Mature Oak with deadwood features present.	PRF	Retained – located within open space
T12 (5369)	Oak	Veteran Oak with deadwood features present.	PRF	Retained – located within open space
T13 (1073)	Oak	Mature Oak with deadwood features present.	PRF	Retained – located within open space
T14 (1068)	Oak	Veteran Oak with several features that could support roosting bats including large rot hole, and a horizontal crack forming a cavity.	PRF-M	Retained – located within open space
T15 (4720)	Oak	Large mature Oak. No features evident but could support some potential given size/age.	FAR	Located outside of application boundary
T16 (2744)	Oak	Mature Oak with several knot holes and collars providing potential roost features.	PRF-M	Located outside of application boundary
T17 (2743)	Oak	Mature Oak with numerous collars, dead branches and splits evident.	PRF-M	Located outside of application boundary
T18 (6000)	Oak	Mature Oak with several knot holes and collars providing potential roost features.	PRF-M	Located outside of application boundary
T19 (858)	Oak	Large mature Oak. No features evident but could support some potential given size/age.	FAR	Retained – located within retained hedgerow corridor
T20 (4141)	Ash	Large mature Ash with knot holes which may lead to cavities.	PRF	Located outside of application boundary
T21 (3270)	Ash	Small split on limb.	PRF	Located outside of application boundary
T22 (3268)	Ash	Two transverse splits on large limbs.	PRF-M	Located outside of application boundary
T23 (3267)	Ash	Mature Ash with extensive rot and open rot holes/wounds on central trunk.	PRF-M	Located outside of application boundary
TG24 (3261-3265)	Ash	Several small Ash trees with die-back, potential features could be present.	FAR	Located outside of application boundary
TG25 (3259-3260)	Ash	Two medium sized Ash trees, one with knot holes, one with splits on collusion.	PRF-M	Located outside of application boundary
TG26 (G54)	Willow, Birch, Ash	Mostly collapsed Willow and Ash with die-back, could support potential features.	FAR	Located outside of application boundary
TG27	Ash	Several young trees. No bat potential evident.	Negligible potential	Located outside of application boundary

Tree Ref.	Species	Assessment and potential roosting features	Summary	Affected under proposals?
TG28	Various	Numerous young trees. No bat potential evident but not surveyed in detail.	FAR	Retained – located within open space or outside of application boundary
T30 (5164)	Oak	Veteran Oak, may support potential features.	FAR	Retained – located within retained woodland
T31 (5160)	Oak	Veteran Oak, may support potential features.	FAR	Retained – located within retained woodland
T32 (6053)	Alder	Multistem Alder at watercourse margin, largely dead with deadwood and rot holes	PRF-M	Retained – located within open space
W13	Various	Trees affected by proposed road access were subject to survey and were not recorded to support bat roosting features.	Negligible potential supported by affected trees	Removal of trees within footprint of proposed road access
Other woodland and trees	Various	Other woodlands and trees not directly affected by development proposals and not subject to detailed survey, albeit potential features may be present.	FAR	Two trees within W8 (4011 and 4012) proposed for removal for pedestrian/cycle route. Removal of tree 4769 and some young trees not supporting PRFs. Other woodland and trees retained or located outside of application boundary.

**Tree numbers under tree survey are shown in brackets*

2.1.3 As set out above, removal of trees under this application are limited to T2, trees within W13 affected by the proposed road access, two trees within W8, tree 4769 and a number of young trees. Further discussion of these trees is set out below:

- T2 – a multi-stem Ash supporting negligible bat roosting potential.
- W13 – a number of trees within the woodland are to be removed for the proposed road access, including mature specimens 4981, 4982, 5300, 5301 and 5302 identified within the Arboricultural Implications Report. These have been subject to ground level inspection in August 2024 and no suitable roosting features were identified. However, further inspection is proposed at the relevant stage to confirm absence of features, given the dense nature of vegetation within the woodland which could limit visibility.
- W8 – further ground level inspection has been completed on 31 March 2025. This recorded a single knot hole on tree 4011 at c.6m height, forming a PRF-I with some limited roosting potential. No features were recorded on 4012, although the tree has a dense cover of Ivy.
- Tree 4769 – a mature Ash to be removed at the southern access. Not recorded to support bat roosting potential.
- Young trees – a number of young trees, predominantly Willow and Alder, are proposed for removal as detailed within the Arboricultural Implications Report to accommodate development areas and access routes. Given their age, such trees are unlikely to have developed roosting potential and none were recorded to support PRFs.

2.1.4 On the basis of the above, tree 4011 is recorded to support a PRF-I. No other PRFs were identified, albeit further inspections of trees within W13 are recommended prior to felling, given the dense nature of vegetation within the woodland which could limit visibility. Accordingly, the following mitigation measure is proposed (superseding MC7 within the Ecological Appraisal).

> ***MC7a – Bat Potential Trees.*** *To safeguard bats during removal of trees, a further inspection will be undertaken by a suitably qualified ecologist immediately prior to felling, with use of an endoscope and climbing inspections (if required) to examine any cavities to ensure that bats are absent and that no evidence of a roost (e.g. droppings) is present. Felling of any trees with PRFs will then be carried out using a 'soft-felling' technique, whereby sections of the tree will be cut and lowered to the ground, followed by leaving the felled sections on the ground for a period of at least 24 hours to allow any bats, should these be present, to escape.*
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> *If any evidence for the presence of roosting bats is recorded, works on that tree will be suspended and consideration will be given to the need to undertake works under a European Protected Species (EPS) development licence, and a licence application will be made to Natural England as required.*
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> *To compensate for the loss of potential roosting resource, a woodcrete bat box will be erected for each affected PRF, placed on retained trees within the nearby vicinity of the affected feature.*

2.1.5 The above measures accord with the recommendations made by Place Services, and this is considered to form a proportionate response given the level of potential recorded and the outline nature of the proposals, with tree removals to be confirmed as part of detailed matters.

2.1.6 In this instance, all relevant trees have been subject to a ground level inspection and no PRF-Ms have been identified requiring further assessment. Nonetheless, a recent appeal decision at Wisley Airfield (appeal ref: APP/Y3615/W/23/3320175, decision dated 24 May 2024) confirms that it may be appropriate to defer such survey work to a later stage, the Inspector setting out at paragraph 120 *"it should be noted that most of the trees are to be retained, albeit that some in the wet woodland in the southern SANG would be removed to accommodate the footbridges and sculpture park. It would be unreasonably onerous to require full climbed surveys of these trees to be done now. If a tree is to be removed then its potential would need to be reassessed at the time, not least because bats are a mobile species. Tree works with the potential to affect a roost would require the necessary licences and most likely an updated survey."* Accordingly, the approach followed is concluded to be fully robust in terms of providing the necessary information for determination on the presence of otherwise of protected species and the extent to which they may be affected by the proposed development.

3 Biodiversity Net Gain

3.1.1 The Place Services response states that the Statutory Biodiversity Metric Calculation Tool is not accompanied by condition assessments and the baseline River Condition Assessment (RCA) for the watercourse, together with a statement of whether the channel is overdeep. Therefore insufficient information has been provided for determination.

3.1.2 The Biodiversity Net Gain report sets out at paragraph 3.1.1 that descriptions of the pre-development ('baseline') habitats are set out within the Ecological Appraisal, together with habitat condition assessments.

3.1.3 A summary of the habitat types and condition is provided at Tables 4.1a, 4.1b and 4.1c within the Ecological Appraisal, with a habitat condition assessment matrix providing full details of the condition assessment criteria at Appendix 6482/7. This is taken directly from the Condition Assessment Sheets at Technical Annex 1 of the Statutory Biodiversity Metric. The results of the RCA (including assessment of whether the channel is overdeep) are also provided at Appendix 6482/7. Further detail in relation to grassland and hedgerow habitats is provided at Appendix 6482/6.

3.1.4 Accordingly, full information on habitat condition assessment is available to ensure that baseline habitats have been recorded appropriately.

3.1.5 The Place Services response also raises some queries regarding post development habitats. Such matters relate to biodiversity gain which would be secured by condition as a pre-commencement requirement. Accordingly, it is proposed that these queries are addressed at this later stage when full details of habitat creation and management are available as part of detailed matters. Notwithstanding this, it is noted that trash is a negative indicator under the RCA such that removal would provide a positive benefit, whilst weir removal rather than creation is proposed, also resulting in positive benefits. As such, it is considered feasible that a net gain in watercourse habitats can be achieved through the proposed enhancements set out within the Biodiversity Net Gain report.

4 Conclusion

4.1.1 This note provides a response to queries raised within the consultation response from Place Services on the southern applications at Land West of Turners Hill, Crawley Down (DM/25/0014 and DM/25/0015).

4.1.2 Further clarification is provided in relation to bats and trees with roosting potential, supplemented by a further inspection of trees within woodland W8. It is confirmed that all relevant trees have been subject to a ground level inspection and no PRF-Ms have been identified requiring further assessment. Nonetheless, a precautionary approach is proposed given the identification of a single PRF-I and potential for additional features due to visibility limitations.

4.1.3 Clarification is also provided on biodiversity net gain and condition assessment information, which is fully provided within the Ecological Appraisal report.