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West Sussex
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Our ref: 17493
Date: 9 June 2026

By email only: Planning Department, planninginfo@midsussex.gov.uk

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/26/1160
Location: Land To The South Of Reeds Lane Reeds Lane Sayers Common
West Sussex
Proposal: Scoping Opinion for the development of up to 2,000 homes,
community uses, employment, public open space and
infrastructure including primary and secondary schools.

Thank you for consulting Ecology Place Services on the above EIA Scoping Opinion.

Scope of the Environment Statement agreed	☒
Scope of the Environment Statement not agreed	☐

Summary

We have reviewed the submitted documents for this EIA Scoping Opinion. This includes:

- Environmental Impact Assessment Scoping Report (Lichfields Ltd, May 2026)
- Cover letter (Lichfields Ltd, May 2026)

This includes the Biodiversity Chapter included within section 9 of the Scoping Report and the Preliminary Ecological Appraisal (BMD Ltd, May 2026) included in Appendix 8 of the Scoping Report.

Baseline Information:

The desktop assessment has been prepared in consultation with the Sussex Biodiversity Record Centre, MAGIC (Multi-Agency Geographic Information for the Countryside) and Woodland Trust Ancient Tree Inventory. As a result, we are satisfied that this provides sufficient information to inform the desk study and that these records inform the survey requirements.

Methodology:

We are satisfied that CIEEM guidelines and standard methodologies have been followed for the Preliminary Ecological Appraisal and have been proposed for the proposed additional ecology surveys. It is outlined that the survey and assessment for protected species should also be in line with [Government Standing Advice](#).

In accordance with Regulation 14 of the EIA Regulations, it is highlighted that the finalised ES should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation.

Any report on badgers should also be submitted as a separate confidential appendix clearly marked as containing sensitive information.

Potential Impacts:Designated sites

This proposed project does not directly impact on statutory or non-statutory designated sites. Whilst the proposals are located within SSSI impact risk zones for Wolstonbury Hill SSSI, we agree that no direct impact pathways are present. Furthermore, we are satisfied that the proposals are not located within any Zones of Influence of any European or internationally designated sites.

Habitat Assessment

The majority of the project passes through arable farmland and grassland. As surveys have not been finalised at this stage, it is not fully clear how the mitigation hierarchy has been applied as part of the design. However, it is confirmed that woodland parcels will be retained and there may be some minor local impacts upon the on-site native hedgerows.

We note that an updated Botanical assessment of higher value areas (grassland and woodland) has been recommended. Therefore, we support this in principle, but recommend that consideration of notable arable flora should be considered as part of the updated botanical assessment.

Protected and Priority Species

We note that the following species surveys have been recommended to be secured:

- **Badger Survey** - Winter walkover survey to record and characterise sett types, signs and activity;
- **Bat activity survey** - to include a minimum of three seasonal transects, including the use of static detectors for five nights each season;
- **Bat Building Inspections/ Nocturnal Surveys** -Internal/ external inspections of buildings within the Site. Potential nocturnal survey any buildings that have potential for roosting bats;
- **Breeding and Wintering Bird Survey** - a series of bird transects during the core breeding season as well as wintering farmland birds;
- **Hazel dormouse survey** - dormouse nest tubes should be deployed in suitable vegetation throughout the survey area. A minimum of 50 should be deployed between April and November and checked monthly to achieve an adequate 'thoroughness' score which is dependent on how many tubes are used, and over how many months they are deployed. Surveys are guided by best practice including the Dormouse Conservation Handbook and Natural England Standing Advice;
- **Reptile survey** - to include eight visits including one visit to install artificial refugia and then seven separate visits during optimal conditions to confirm presence of reptiles or likely absence;
- **Otter and water vole** - two surveys in May and August to record signs of otter and water vole presence within the watercourses on and adjacent to the Site;
- **Great crested newt** - eDNA sample of onsite pond and off-site ponds within 500m of the Site boundary.

Therefore, we are satisfied that appropriate species surveys have been recommended, which will inform the finalised mitigation and compensation measures to be secured during the construction and operation phase.

The Environmental Impact Assessment Scoping Report (Lichfields Ltd, May 2026) states that further surveys for invertebrates will be scoped out as part of the assessment, as the on-site habitats are suboptimal for supporting significant populations of rare or priority invertebrate species. As a result, we agree that invertebrate surveys are not required.

We note that aquatic vertebrates have not been considered within the Environmental Impact Assessment Scoping Report (Lichfields Ltd, May 2026), even though two unnamed ordinary watercourses are present within Site Parcels A and B and with Herrings Stream present to the east of Parcel C. However, we are minded to agree that detailed assessment for aquatic vertebrates would be disproportion based on the likely impacts. Nevertheless, we recommend that a statement should be included within the finalised Environment Statement.

Biodiversity Net gain:

Applications are required to deliver a mandatory 10% measurable biodiversity net gain, unless exempt under [paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990](#) and the [Biodiversity Gain Requirements \(Exemptions\) Regulations 2024](#).

Biodiversity net gains is a statutory requirement set out under [Schedule 7A \(Biodiversity Gain in England\) of the Town and Country Planning Act 1990](#). This legislation was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021, and was amended by the Levelling Up and Regeneration Act 2023. The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024 made consequential amendments to other parts of the 1990 Act.

The [Biodiversity Net Gain Planning Practice Guidance \(PPG\)](#) sets out how mandatory biodiversity net gains should be applied through the planning process.

The Environmental Impact Assessment should thoroughly explore all reasonable options to deliver on-site enhancements in line with the Biodiversity Gain Hierarchy. Opportunities to enhance linear features and create coherent ecological networks should be explored as part of the design.

We agree a detailed River Condition Assessment will be required for this application and all condition assessments for the pre-development baseline should be included within the Biodiversity Net Gain Assessment. This should also include a habitat maps of the pre-development baseline and a copy of the Statutory Biodiversity Metric – Calculation Tool (Excel spreadsheet).

Bespoke biodiversity enhancements:

The application should therefore offer reasonable biodiversity enhancements for protected and Priority or threatened species are also secured to deliver net gains for biodiversity, as outlined under Paragraphs 187d of the National Planning Policy Framework December 2024. The reasonable biodiversity enhancement measures could be provided upfront within the application or outlined within a Biodiversity Enhancement Strategy to be secured as a condition of any consent. The proposed measures could include integrated bird and bat boxes which match the brick types of the new buildings.

Conclusion

We agree that Biodiversity is scoped in for further assessment within the Environmental Impact Assessment.

Please contact us if you have any queries in relation to this advice.

Yours sincerely,

Hamish Jackson ACIEEM BSc (Hons)
Senior 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.

