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4th August 2025

RE: OUTLINE APPLICATION WITH ALL MATTERS RESERVED EXCEPT FOR ACCESS, FOR UP TO 80 DWELLINGS WITH ASSOCIATED LANDSCAPING, OPEN SPACE, INFRASTRUCTURE AND VEHICULAR AND PEDESTRIAN ACCESSES. ADDITIONAL INFORMATION OF A FURTHER TRANSPORT NOTE IN RESPONSE TO THE HIGHWAYS AUTHORITY CONSULTATION.

PLANNING REFERENCE: DM/25/0445

This letter serves to provide a valuation and assessment of the hedgerows on site, as part of the outline application DM/25/0445 Land at Colwell Farm, Lewes Road, Haywards Heath, West Sussex for the construction of up to 80 dwellings with associated landscaping, open space, infrastructure and vehicular and pedestrian accesses.

This document addresses concerns specifically related to Hedgerows of Potential Importance (HPI) and should be read in conjunction with the EcIA Report (Ecosupport, 2025). At this stage the outline application is under consideration, however it should be noted that Place Services (on behalf of Mid Sussex District Council) have issued no ecological objections to the proposed scheme.

The following information has been provided to clarify, contextualize, and, where applicable, address the concerns regarding the potential ecological impacts of the proposed development on the existing hedgerow network.

1.0 HEDGEROWS

1.1 Ecological Baseline

The site currently supports a network of linear features, in the form of tree lines and hedgerows, which separate the grassland parcels on site. The majority of the site supports tree lines with well-developed scrub understoreys or bracken, however some shorter sections of hedgerow are present. The below information has been extracted from the EcIA Report (Ecosupport, 2025).

1.1.1 Lowland Mixed Deciduous Woodland (w1f) – with line of trees (33) and ditch (50)

Around all boundaries of the site there are mature line of trees present (**Fig 1a**) some with connectivity into further woodland. Browsing damage caused by grazing Deer was noted on a number of the trees. There are also two small ditches present with these treelines (**Fig 1b**). Species noted included; Yew *(Taxus Baccata)*, Silver Birch *(Betula pendula)*, Oak (*Quercus Spp.*), Hazel *(Corylus avellana)*, Beech *(Fagus sylvatica)*, Willow (*Salix spp.*), Sycamore *(Acer pseudoplatanus)* and Ash *(Fraxinus excelsior)*.

Figure 1a. Line of trees present on site (June 2024).

Figure 1b. View of one of the ditches present on site (taken June 2024).

1.2 Hedgerow Valuation

1.2.1 HPI Classification

As stated in section 1.1.1, the tree lines and hedgerows on site consist of 8 native species, with species recorded including Oak (*Quercus robur*), Ash (*Fraxinus excelsior*), Sycamore (*Acer pseudoplatanus*), Yew *(Taxus baccata*), Silver Birch (*Betula pendula*), Hazel (*Corylus avellana*), Beech (*Fagus sylvatica*) and Willow (*Salix* spp.) In addition, within 30m stretches, at least five UK native or archaeophyte woody species have been recorded. The presence of ditches and connectivity to adjacent woodland further enhances the value of the linear features. The Hedgerow Regulations (1997) state, a linear group of trees or 'treeline' with a diverse mix of native woody species and associated landscape features—such as ditches—may be subject to the same consideration as important hedgerows, where they function as boundary features and support ecological connectivity. Taking the above into account, the hedgerows and lines of trees on site are considered to be Habitats of Potential Importance (HPI), under statutory and biodiversity criteria for habitat significance.

1.2.2 Hedgerow Regulations (1997) Classification

Under section 97 (hedgerows) of the Environment Act 1995 and these Regulations, a hedgerow is "important" if it, or the hedgerow of which it is a stretch,—

a) has existed for 30 years or more; and
b) satisfies at least one of the criteria listed in Part II of Schedule 1.

Due to poor image quality it was not possible to ascertain whether the hedgerows were present in 1995 (Google Earth Pro). However, the hedgerows were seen to be present and well-established on site in 2001, therefore it is considered likely that the hedgerows have existed for 30 years and therefore meet criteria (a).

The hedgerows on site also meet criteria (b) of the Hedgerow Regulations (1997) as they support protected species (Dormice).

The criteria under The Hedgerow Regulations, Part II, Paragraph 7 lists additional criteria for determining hedgerows of potential importance, where the hedgerow includes -

a) at least 7 woody species;
b) at least 6 woody species, and has associated with it at least 3 of the features specified in sub-paragraph (4);
c) at least 6 woody species, including one of the following—

   black-poplar tree *(Populus nigra* ssp *betulifolia)*;
   large-leaved lime *(Tilia platyphyllos)*;
   small-leaved lime *(Tilia cordata)*;
   wild service-tree *(Sorbus torminalis)*; or
d) at least 5 woody species, and has associated with it at least 4 of the features specified in sub-paragraph (4), and the number of woody species in a hedgerow shall be ascertained in accordance with sub-paragraph (3).

Under Part II, Paragraph 7 the hedgerows at Land North of Colwell Farm qualify as a Hedgerow of Potential Importance (HPI) under the Hedgerow Regulations (1997), as they contains at least 8 woody species, including Oak, Ash, Sycamore, Yew, Silver Birch, Hazel, Beech and Willow. This exceeds the minimum requirement of seven woody species specified in criterion 7(1)(a), so the hedgerow meets the definition of HPI based solely on species diversity.

1.3 Likely Ecological Impacts in Absence of Mitigation

1.3.1 Impacts to Hedgerows

Proposals will involve the fragmentation of the central tree lines in order to facilitate access between the parcels (**Fig 2**). There will also be a gap required in the northwest hedgerow for access. Smaller gaps within the central tree lines are proposed for footpaths, therefore allowing the preservation of canopy connectivity and hedgerow functionality. The larger gaps for the access roads are several metres wide, therefore the retention of connectivity is not possible here. However, connectivity around thew site will be retained as the boundary features will remain intact (**Fig 2**).

In addition, clearance work taking place adjacent to hedgerows could adversely affect these habitats through damage by machinery and particularly by root zone compaction. This would have a ***certain adverse impact*** to habitats of ***site - local*** value.

Figure 2. Locations of the gaps to be cut into the linear features on site (indicated by yellow stars).

1.4 Mitigation & Compensation

1.4.1 Hedgerow Connectivity

The access roads to be constructed between the grassland parcels present a disruption to some of the existing linear features, presenting a potential impact to commuting bats. Excluding these sections of hedgerow to be removed, in addition to the northwest access, all trees are to be retained under current proposals. 'Hop overs' will be provided at locations where disruption of linear features is present in order to maintain site connectivity for commuting bats (locations displayed above in **Fig 2**). These will be produced by planting native trees/shrubs either side of the crossing points to reduce the distance the bats need to travel across these points. Additionally, these areas will also support lower light levels, therefore maintaining functionality as corridors for commuting bats.

Recommended species planting of tree/shrub species may include:

- Hazel (*Corylus avellana*)
- Hawthorn (*Crataegus monogyna*)
- Blackthorn (*Prunus spinosa*)
- Field Maple (*Acer campestre*)
- Oak (*Quercus robur*)
- Rowan (*Sorbus aucuparia*)
- Silver Birch (*Betula pendula*)

- Wild Cherry (*Prunus avium*)

1.4.2 Tree / Shrub Planting

As a general enhancement, any new hedgerow planting will use only native hedgerow species over non-natives and ornamentals (in line with the CIEEM guidance outlined within Smith & Day (2012). Species that can be considered within any planting include: Rowan (*Sorbus aucuparia*), Alder (*Alnus glutinosa*), Hazel (*Corylus avellana*), Holly (*Ilex aquifolium*), Silver Birch (*Betula pendula*), Small-leaved Lime (*Tillia cordata*) and Willow (*Salix* spp.).

Planting a mixture of flowering plants, trees (including fruit trees) and shrubs encourages a diversity of insects to sustain bats. It is beneficial that the flowers vary in colour (although pale flowers are more easily seen in poor light and so attract insects at dusk), fragrance, shape, amount of nectar and time of flowering. (It is important to provide native flowering plants, shrubs and trees throughout spring, summer and autumn). Flowers with 'landing platforms' for insects increase opportunities for insects and in turn foraging bats and these will be included within marginal habitats where appropriate.

1.5 Hedgerow Enhancement & Management Strategy

1.5.1 Hedgerow Enhancement

The boundary hedgerows on site will be enhanced through the implementation of a 2m protective buffer in which no works will take place. This is inclusive of the 15m ancient woodland buffer that has been proposed along the south and east boundaries of the site

The buffer will be planted with a seed mix as described in **section 1.4.1**. As the hedgerows on site already support high species diversity, no further planting is considered necessary. However, the following management strategy will be implemented.

1.5.2 Hedge Trimming Regime

The more favourable approach to managing hedgerows for the benefits of small mammals is to encourage minimal interference and ensure when there is any cutting, it does so after autumn fruiting (so late winter is preferable). The key points of the management prescriptions will therefore be as follows (adopting recommendations as outlined within Bright and MacPherson 2002):

- Cutting will be done on a 3-year cycle (part of the hedges on site cut during the first year, another part of the hedges cut during second year and no cutting during the third year), to provide sustained foraging opportunities across the site every active season. Hedgerows will be allowed to develop into a tall, dense, bushy structures and maintained at a height of 3 – (preferably 4) meters.
- A proportion of hedges (at least 30%) should be left to grow for at least 7 – 10 years.
- Not all hedgerows should be cut in any one year, so some heavy fruiting hedges are always present.
- Flails should not be used if possible, meaning management works will likely involve cutting using hand tools
- Coppicing or laying should be used to manage an of the hedgerows on site which become gappy or spars
- If the size of the hedgerow needs to be reduced, avoid cutting the top and cut one side.

2.0 CONCLUSION

This document evaluates the ecological importance of the hedgerows and tree lines present at the site, Land North of Colwell Farm, Haywards Heath, in relation to the proposed development of up to 80 dwellings and associated landscaping. The existing on-site linear features comprise primarily mature tree lines and hedgerows with scrub or bracken understoreys. These features support a high diversity of native species, in addition to Dormice, and therefore meet and exceed the criteria set out in the Hedgerow Regulations (1997) for classification as Hedgerows of Potential Importance (HPI).

In order to facilitate road linkages and footpaths between parcels, the central tree lines and northwest hedgerow will be fragmented. While this will result in some loss of habitat connectivity, the majority of boundary linear features will be retained, therefore not impacting the overall connectivity of the site. Mitigation measures such as “hop overs” and native planting has also been proposed to improve crossing points for commuting bats and maintain ecological connectivity. In addition, a 2m buffer has been proposed to protect all hedgerows on site.

Overall, the implementation of these mitigation and enhancement measures will maintain the ecological value of the site and functional connectivity of the hedgerow network.

3.0 REFERENCES

Bright et al., (2006) The Dormouse Conservation Handbook

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UKHab Ltd. (2023). *UK Habitat Classification – Habitat Definitions Version 2.0* (July 2023).