

Crowborough Army Training
Camp
Ecology Technical Note

Revision 2
October 2026

Prepared for:

Home Office

© 2026 [REDACTED]. All Rights Reserved.

This document has been prepared by [REDACTED] for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between [REDACTED] and the Client. Any information provided by third parties and referred to herein has not been checked or verified by [REDACTED] unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of [REDACTED]

Table of contents

1.	Introduction	1
1.1	Overview	1
1.2	Planning Policy Context.....	1
1.3	Scope of Assessment.....	2
2.	The Site	4
2.1	Overview	4
2.2	Sensitive receptors	4
3.	Proposed Development.....	5
3.1	Overview	5
4.	Baseline conditions	6
4.1	Designated sites	6
4.2	Habitats	6
5.	Assessment of Potential Impacts.....	12
5.1	Overview	12
5.2	Ashdown Forest.....	12
5.3	Habitats	12
6.	Conclusions.....	14
7.	References.....	15
	Appendix A Figures	16
	Appendix B Target Notes	19

Table of Plates

Plate 3.1	Regularly mown other neutral grassland present throughout the Site	7
Plate 3.2		7
Plate 3.3	Mature trees present throughout the Site	8
Plate 3.4	Woodland on western edge of Site.....	8
Plate 3.5	Dry ditch across centre of the Site (north to south).....	9
Plate 3.6	One of the buildings and roads on Site	10

1. Introduction

1.1 Overview

- 1.1.1 [REDACTED] has been appointed by the Home Office (the Applicant) to prepare an Ecology Technical Note to accompany the submission of a planning application for an Urgent Crown Development Order (UCDO) for the continued use of the Crowborough Army Training Camp in East Sussex (hereafter referred to as 'the Site') as non-detained accommodation for asylum seekers for a temporary period until 22nd January 2030 (hereafter the 'Proposed Development'). Whilst the Training Camp (also known as Beacon Camp or the wider site) covers 64 hectares (ha), the Site extends to 19.68ha and is shown on the Site Location Plan (see **Appendix A**).
- 1.1.2 In January 2026, the Applicant received planning permission under Class Q, Part 19 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 ("the 2015 Order") for works to set up a facility to accommodate 540 asylum seekers for a period of 12 months (referred to as the 'Extant Consent'). The Extant Consent expires on 22nd January 2027 and therefore the purpose of this planning application is to seek approval for the Home Office to continue to operate the Site as asylum accommodation for a temporary period until 22nd January 2030.

1.2 Planning Policy Context

National Planning Policy Framework (NPPF) 2026

- 1.2.1 The NPPF was first published in March 2012 and has been updated regularly since, most recently in 2026 (Ref. 1).
- 1.2.2 The NPPF states the commitment of the UK Government to minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity. It specifies the obligations that the Local Authorities and the UK Government have regarding statutory designated sites and protected species under UK and international legislation and how this is to be delivered in the planning system. Protected or notable habitats and species can be a material consideration in planning decisions and may therefore make some sites unsuitable for particular types of development, or if development is permitted, mitigation measures may be required to avoid or minimise impacts on certain habitats and species, or where impact is unavoidable, compensation may be required.
- 1.2.3 Chapter 19 of the NPPF 'Conserving and enhancing the natural environment' sets out the requirements to consider biodiversity in planning decisions.

Local Planning Policy

- 1.2.4 The Local Planning Authority is Wealden District Council who have adopted a number of documents that form part of the statutory development plan. Relevant local planning policies are detailed in:
- the adopted Wealden District Core Strategy Local Plan (February 2013) (Ref. 2); and
 - the 'saved' policies of the adopted Wealden Local Plan (1998) (Ref. 3).
- 1.2.5 A new Local Plan is expected in September 2026. For full details of specific policies please refer to the source documents.
- 1.2.6 The Core Delivery Policy WCS12 Biodiversity from the Wealden District Core Strategy Local Plan is summarised below:
- 1.2.7 To contribute to the biodiversity targets provided in the Sussex Biodiversity Action Plan the Council will prevent a net loss of biodiversity, ensure a comprehensive network of habitats, and maximise opportunities to ensure habitats, biodiversity features and ecological networks are maintained, restored, enhanced and where possible created to achieve a net gain in biodiversity and sustain

wildlife in both rural and urban areas. This will be achieved through the development and implementation of an integrated green network strategy.

- 1.2.8 In order to avoid the adverse effect on the integrity of the Ashdown Forest Special Protection Area and Special Area of Conservation it is the Council's intention to reduce the recreational impact of visitors resulting from new housing development within 7km of Ashdown Forest by creating an exclusion zone of 400m for net increases in dwellings in the Delivery and Site Allocations Development Plan Document and requiring provision of Suitable Alternative Natural Green Space and contributions to on-site visitor management measures. Mitigation measures within 7km of Ashdown Forest for windfall development, including provision of Suitable Alternative Natural Green Space and contributions to on-site visitor management measures will be contained within the Delivery and Sites Allocation Development Plan Document and will be associated with the implementation of the integrated green network strategy. In the meantime, the Council will work with appropriate partners to identify Suitable Alternative Natural Green Space and on-site management measures at Ashdown Forest so that otherwise acceptable development is not prevented from coming forward by the absence of acceptable mitigation. The Council will also undertake further investigation of the impacts of nitrogen deposition on the Ashdown Forest Special Area of Conservation so that its effects on development in the longer term can be more fully understood and mitigated if appropriate.

1.3 Scope of Assessment

- 1.3.1 As no development works are proposed at the Site, a full Preliminary Ecological Appraisal was considered unnecessary. This Technical Note presents ecological information obtained from a walkover survey of the Site (the Site boundary is shown in **Appendix A**) to provide an assessment of habitats and identify any potential ecological constraints.
- 1.3.2 An internet-based desk study for statutory designated sites within 2km (using Defra's 'Magic' interactive on-line map, accessed on 6th August 2026) (Ref. 4) and review of aerial mapping were carried out, however for reasons of confidentiality no data records have been requested from the Local Environmental Records Centre.
- 1.3.3 The walkover survey was carried out of the Site (within the Site boundary as shown in **Appendix A**) on 5th August 2026 by experienced [REDACTED] ecologists. The purpose of the ecology walkover survey was to assess habitats on Site and their suitability to support protected and notable species, identify any potential ecological constraints and make any recommendations if required.
- 1.3.4 Broad habitat types were identified using UKHab (V2.01) (Ref. 5) but were not mapped. Target notes (TNs) were mapped to record habitats and features. A Site Plan, showing an aerial view of the Site with TNs is shown in **Appendix A**. Photos of habitats and features are shown as Plates within the body of this report and with TNs in **Appendix B**.
- 1.3.5 Habitat condition assessments were not carried out and the baseline value of habitats on the Site (using the Statutory Biodiversity Metric) was not assessed as no development works are proposed and no direct effects on habitats are anticipated. Therefore, the Proposed Development is exempt from the mandatory 10% biodiversity net gain requirement.
- 1.3.6 Habitats were appraised for their suitability to support protected and notable species. Buildings were also considered for their bat roost and nesting bird potential, to highlight any potential ecological constraints if any works are proposed in the future, however a full Preliminary Roost Assessment of buildings and Ground Level Tree Assessment for bats was not carried out.
- 1.3.7 Non-native invasive plant species were noted where incidentally found, however a full, dedicated non-native invasive species survey of the Site was not undertaken.

Limitations

- 1.3.8 The walkover survey was carried out on 5th August 2026 after a period of prolonged drought and therefore most grasses and herbs had died back. This was a limitation to the walkover survey as most grass and herb species could not be identified and some may not have been visible. However, the diversity of grassland species and relative percentage cover of grass and herb species could be determined, and some species could be identified which was considered sufficient to determine the broad habitat type.

1.3.9

[REDACTED], observations were made from the nearest accessible location. Woodland on the west and east and along the northern boundary was also protected by security fencing and could not be accessed for survey.

2. The Site

2.1 Overview

- 2.1.1 The Site lies in Wealden District in East Sussex. It is located 2.5km southwest of Crowborough town centre and the urban fringe of Crowborough extends to the entrance of the Training Camp on Uckfield Road (the A26).
- 2.1.2 The Site covers an area of 19.68ha and is surrounded by a 2m high perimeter fence. The Site contains 95 individual buildings arranged within a broadly rectangular central area. Most of these buildings are used for accommodation, with other buildings used for catering, training, offices, healthcare and a gym. Some buildings are currently fenced off and not used. Internal roads and footpaths provide circulation throughout the Site, with several car parking areas distributed across the Site. Existing infrastructure present on the Site comprises generators, CCTV cameras, ablution blocks, the temporary PKL kitchen and lighting towers. The areas between buildings and infrastructure are predominantly grassed, with sporadic tree planting. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- 2.1.3 Most recently the Site was used by the Ministry of Defence (MoD) as transitional accommodation for the Afghan Resettlement Programme in 2024 and since January 2026 has been used to provide temporary accommodation for asylum applicants.
- 2.1.4 The Site is mostly surrounded by woodland, with agricultural land beyond. A timber suppliers and industrial units are situated to the immediate south. The nearest residential properties are Birchfield Farm which is located on The Warren adjacent to the south of the Site, Jackman's Lodge 100m to the north-west and a recent housing development 200m to the east of the Site near the A26 Uckfield Road.

2.2 Sensitive receptors

- 2.2.1 The Site lies within the High Weald National Landscape (formerly known as Areas of Outstanding Natural Beauty, AONBs).
- 2.2.2 Ashdown Forest lies 280m south of the Site, extending to approximately 2-2.5km to the west and north of the Site. Ashdown Forest is a site of international and national importance as it is designated as a:
- Special Protected Area (SPA);
 - Special Area of Conservation (SAC); and
 - Special Site of Scientific Interest (SSSI).
- 2.2.3 Ashdown Forest is important for its heathland, semi-natural woodland and valley bog habitats as well as uncommon plants and lichens, rich invertebrate fauna and population of heathland and woodland birds. Protected and notable species listed in the Ashdown Forest SSSI citation include hazel dormice *Muscardinus avellanarius*, great crested newt *Triturus cristatus*, common reptiles, rare and uncommon birds, rare invertebrates and lichens.
- 2.2.4 The Site lies within the SSSI Impact Risk Zone for Ashdown Forest SSSI. Several development works are listed on Magic as representing a potential risk of adversely impacting Ashdown Forest SSSI, including recreational pressure.
- 2.2.5 Information on the Ashdown Forest SAC/SPA/SSSI designated features are detailed in Baseline Conditions in **Section 4** below.

3. Proposed Development

3.1 Overview

3.1.1 The Applicant is intending to seek planning permission for:

'Continued use of Crowborough Army Training Camp (sui generis) as non-detained asylum accommodation for up to 540 residents together with associated site infrastructure for a temporary period until 22nd January 2030.'

3.1.2 The Proposed Development does not constitute any changes to the Site in terms of additional construction activities or changes to its operation.

3.1.3 No construction or groundworks are proposed and the existing facilities that have been installed on the Site under the Extant Consent (including temporary ablution blocks, CCTV cameras, lighting towers, generators and the temporary kitchen ancillary units) will be retained and continue to be used on a temporary basis.

4. Baseline conditions

4.1 Designated sites

- 4.1.1 There is one statutory designated site within 2km, Ashdown Forest SAC/SPA/SSSI, which lies 280m south of the Site. Habitat located between the Site and Ashdown Forest comprises agricultural land, a timber yard and blocks of woodland.
- 4.1.2 Ashdown Forest is designated as a SAC for:
- Annex I habitats that are a primary reason for selection of this site: 4010 Northern Atlantic wet heaths with *Erica tetralix* and 4030 European dry heaths; and
 - Annex II species present as a qualifying feature, but not a primary reason for site selection: 1166 great crested newt *Triturus cristatus*
- 4.1.3 Ashdown Forest is designated as a SPA for breeding populations of two rare bird species, the European nightjar *Caprimulgus europaeus* and the Dartford warbler *Sylvia undata*.
- 4.1.4 It is designated as a SSSI for its heathland, semi-natural woodland and valley bog habitats as well as uncommon plants and lichens, rich invertebrate fauna and population of heathland and woodland birds. Protected and notable species include hazel dormice, great crested newt, silver studded blue butterfly *Plebejus argus* and bog bush cricket *Metrioptera brachyptera*.
- 4.1.5 The Site lies within the SSSI Impact Risk Zone for Ashdown Forest SSSI. Within this zone of influence (Zol), various development-related impacts could potentially have significant impact on Ashdown Forest SSSI, including recreational pressure. Regarding recreational pressure, Magic states “*Within this Zol, any proposals for any net increase in residential units will have a likely significant effect on the qualifying features of the European Site(s) (habitats site(s)) through increased recreational pressure when considered either alone or in combination with other plans and projects*”.

4.2 Habitats

Desk study

- 4.2.1 The Magic on-line map shows a large strip of Ancient Woodland along the northern boundary of the Site (adjacent to the Site boundary but outside of the Site) which connects to smaller blocks of woodland adjacent to the western and eastern edges of the Site and to the network of other woodland in the wider area. The woodland at the western and eastern edges of the Site is mapped as Deciduous Woodland on the Priority Habitat Inventory. The woodlands adjacent to the Site were bounded by security fencing and could not be accessed during the walkover survey.
- 4.2.2 Large areas of Lowland Heathland Priority Habitat and pockets of ‘Good quality semi-improved grassland’ (Non-Priority Habitat) are mapped within Ashdown Forest 280m south of the Site.
- 4.2.3 No Priority Habitats or other notable habitats were mapped within the Site itself. No European Protected Species licence records were identified within 2km.

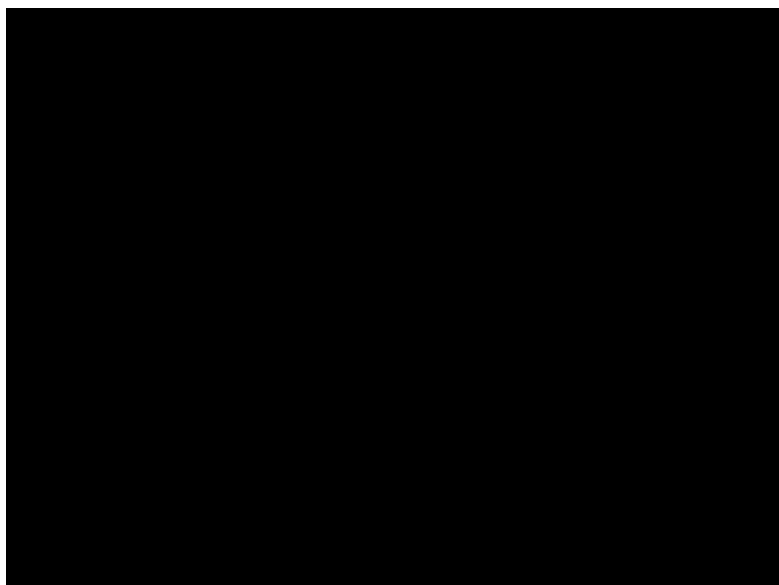
Field survey

Habitats

Other neutral grassland

- 4.2.4 The majority of the Site was deemed as ‘Other neutral grassland’ which was regularly mown and had a very short sward (c. 5cm high) at the time of survey. There was poor to moderate diversity of grass species with occasional herbs (which had mostly died back, preventing identification). Some areas had small patches of bare ground.

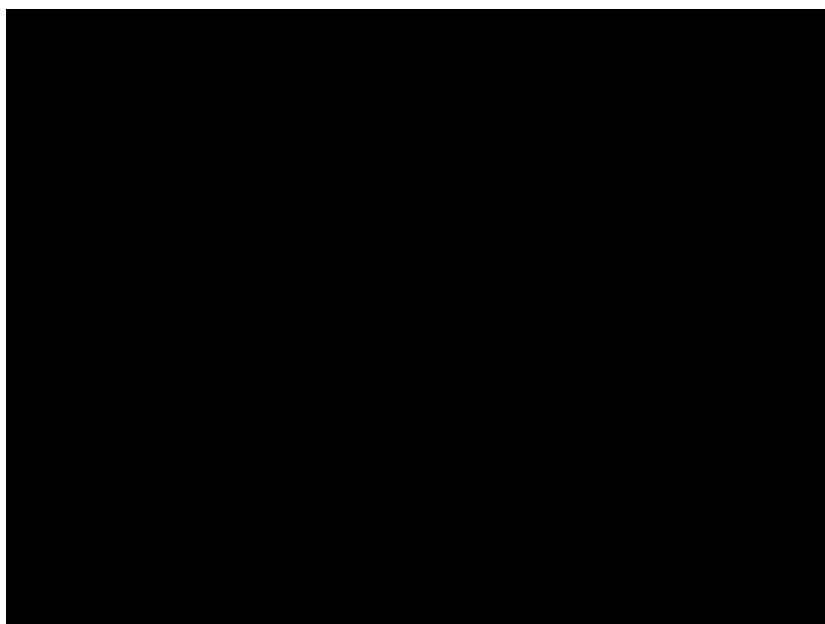
Plate 3.1 Regularly mown other neutral grassland present throughout the Site



4.2.5

[REDACTED] The area [REDACTED] [REDACTED] could be sufficiently viewed to determine the broad habitat type; which was classed as 'Other neutral grassland'. The grassland was less regularly mown at the time of survey and comprised patches of relatively tall (up to 1m) and moderately tall sward (15cm - 20cm) grassland. Species included frequent false oat grass *Arrhenatherum elatius*, cocks-foot *Dactylis glomerata* and occasional common sorrel *Rumex acetosa*. Black knapweed *Centaurea nigra* was rare (small, localised patches). A tall security fence (c. 2m high) lined the northern boundary, which was bordered by Ancient Woodland.

Plate 3.2 [REDACTED]

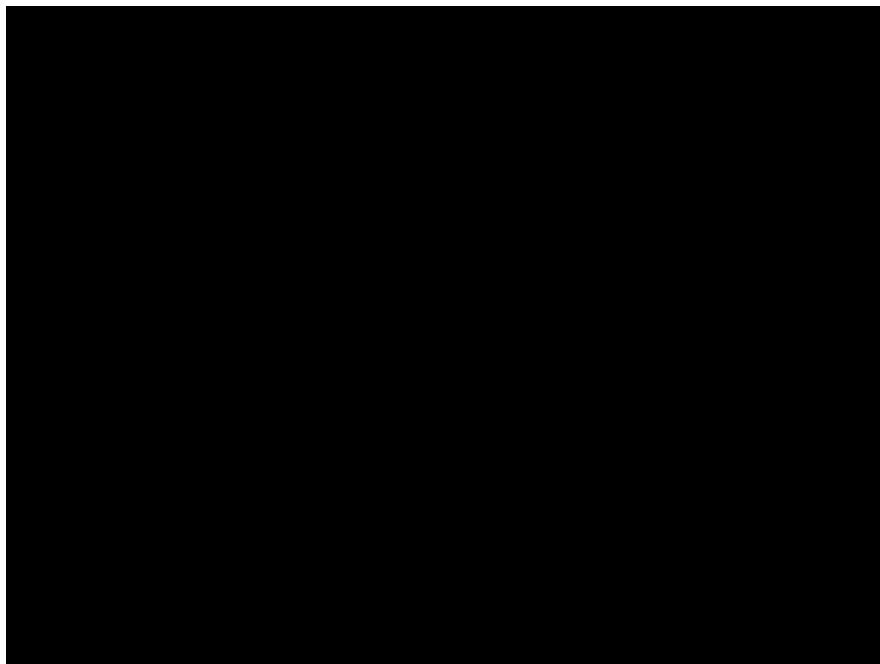


Scattered trees

4.2.6

There were several mature and semi-mature trees throughout the Site, scattered, or in groups or lining roads. Species included Scot's pine *Pinus sylvestris*, other *Pinus* spp., willow *Salix* spp., silver birch *Betula pendula* and common oak *Quercus robur*. None of the trees were ancient or veteran as they were not of sufficient size nor had veteran features. However, there were at least two dead trees which had limbs removed, but the trunks/stems were retained as monoliths. They had holes and other rot features which are beneficial for wildlife (shown in the Target Note Figures in **Appendix B**).

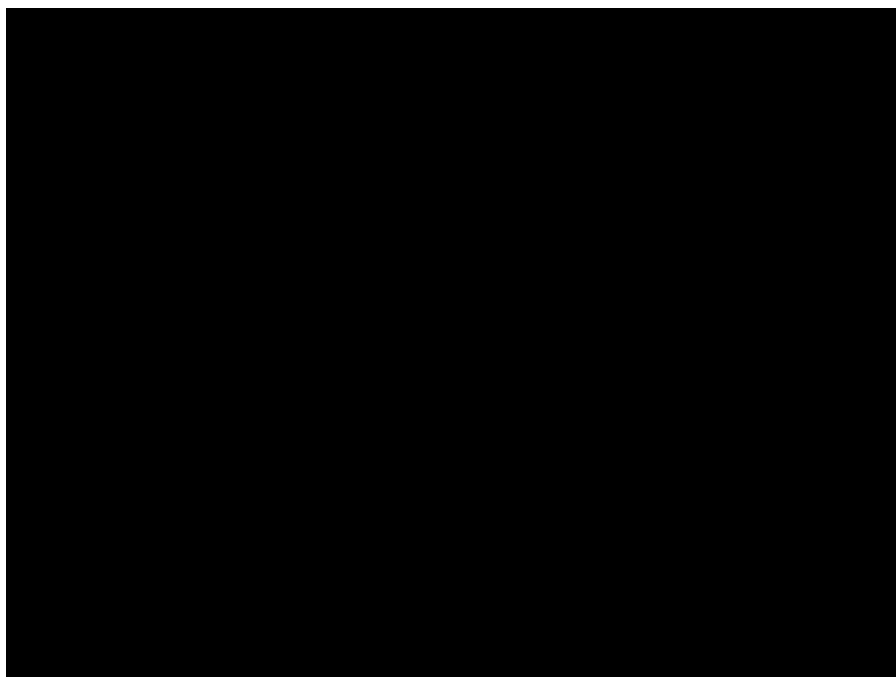
Plate 3.3 Mature trees present throughout the Site



Broadleaved woodland

- 4.2.7 Small blocks of broadleaved woodland lined the eastern and western edges of the Site as well as the strip of Ancient Woodland along the northern boundary, however they were bound by security fencing and therefore could not be accessed for survey. Species included common oak, silver birch and willow *Salix* spp.

Plate 3.4 Woodland on western edge of Site



Dry ditches

- 4.2.8 There was a dry ditch along the centre of the Site and small sections of dry ditch at the northeast and southwest of Site. Although the survey was undertaken during a period of drought, the ditches were not likely to hold water for much of the year due to the presence of terrestrial vegetation and no evidence of aquatic or wetland species.

Plate 3.5 Dry ditch across centre of the Site (north to south)



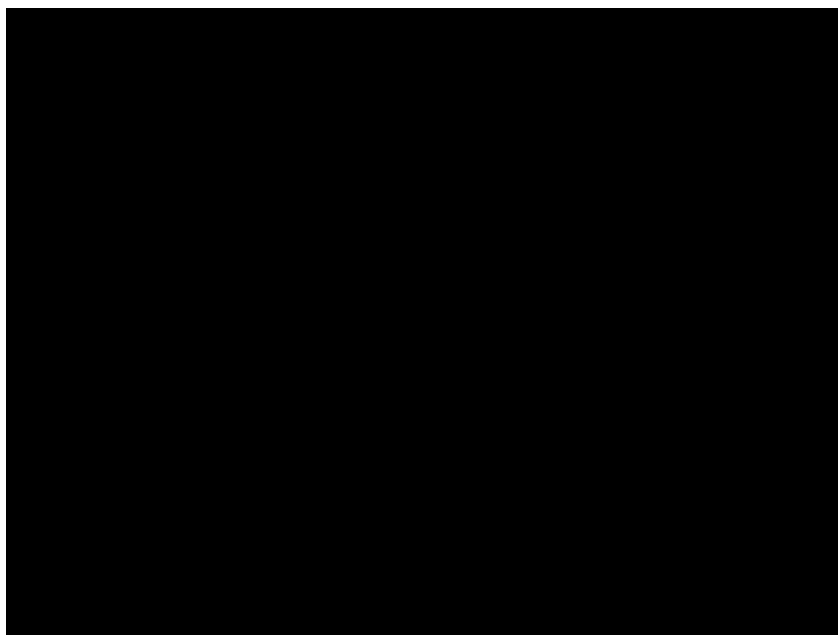
Invasive non-native plant species

- 4.2.9 Cotoneaster and rhododendron were found in two landscaped planting areas and another small single stand of rhododendron was found adjacent to the road, in the southeast area of the Site (shown in TNs 5, 6 and 8 **Appendix A** and **Appendix B**). The species appeared to be *Rhododendron ponticum* and *Cotoneaster simonsii*, which are non-native invasive plant species listed on Schedule 9 of the Wildlife and Countryside Act 1981 as amended (Ref. 6).

Other developed land and buildings

- 4.2.10 There was a network of single-track tarmac roads leading to several single-storey buildings, used as dormitories, kitchens and other facilities. The buildings had pitched roofs which either had tiles or metal sheeting. Buildings had external lighting and there were also lighting towers situated near buildings and roadsides.

Plate 3.6 One of the buildings and roads on Site



Protected and notable species

Amphibians

- 4.2.11 Great crested newts are known to be present in Ashdown Forest as they are a designated feature of the SAC and listed in the Ashdown Forest SSSI citation. There are five mapped ponds within 500m of the Site which could be used by breeding great crested newts and other common amphibians such as common newt *Lissotriton vulgaris* and common frog *Rana temporaria*. There were no waterbodies on Site, however the ponds outside of the Site were situated to the north, east, west and south and therefore the Site may be used as terrestrial habitat during dispersal between these ponds. Most of the Site, being regularly mown and very short sward grassland, is likely to be of poor suitability for foraging and provides very limited daytime refuge. Woodland surrounding the Site provides more suitable habitat. Therefore, great crested newt and other amphibians, if present, are likely to be in low numbers and limited to areas of tall vegetation around the periphery of the Site or around the dry ditches.

Badger

- 4.2.12 There was no evidence of badger *Meles meles* on Site. Surrounding woodland to the north and west provides suitable habitat for badger setts. However, the security fencing bounding the Site is likely to restrict access to badgers. Together with limited foraging opportunities on Site, lack of cover and scale of human activity, badger use of the Site is anticipated to be limited.

Bats

- 4.2.13 The grassland and trees on Site provide suitable foraging and commuting habitat for bats, especially due to the Site location - with ancient woodland to the north and other broadleaved woodland to the east and west which connect to woodland networks in the wider landscape. Buildings and trees on Site could also provide bat roosting habitat. A full preliminary bat roost assessment was not carried out; however, potential bat roost features were noted incidentally including small gaps in brickwork above windows of buildings and rot holes in the dead trees (the latter locations and photos are shown in TNs 3 and 4 in **Appendix A** and **Appendix B**).
- 4.2.14 There were outside lights on some buildings and lighting towers situated mostly by buildings and roads. However, only the areas around buildings and roads had lights therefore other areas of the Site would be largely unlit. Locations and a figure of some of the existing lighting are shown in **Appendix A** and **Appendix B**: TN 7.

Birds

- 4.2.15 Trees on Site provide suitable nesting habitat for birds. Buildings on Site may also be suitable if there are any ledges, cavities in brickwork or lifted tiles on roofs which could provide nesting opportunities.
- 4.2.16 There was no suitable habitat on Site for Dartford warbler or nightjar, which are features of Ashdown Forest SPA; as these bird species require gorse scrub, heathland and/or, for nightjar, areas of cleared plantation woodland.

Hazel dormice

- 4.2.17 Hazel dormice are known to be present in the wider area (they are stated in the Ashdown Forest SSSI citation) and are therefore likely to be present in woodland adjacent to the Site along the northern, eastern and western edges of Site. Dormice need connecting shrubs or trees to disperse as they do not usually disperse along the ground. The scattered trees within the Site were not considered likely to be used by dormice where they lacked connectivity to the surrounding woodland habitat, especially conifers which do not provide foraging opportunities. However, trees around the western and eastern edges of the Site connect to woodland. Dormice could therefore use the tree canopies for foraging and dispersing (where tree canopies connect).

Invertebrates

- 4.2.18 The habitats on Site are considered unlikely to support a diverse invertebrate assemblage (being mostly mown grassland with dry ditches, scattered trees and artificial built environments). The trees were not overly mature and did not have many rot features suitable for uncommon saproxylic invertebrates. Invertebrate communities on Site are therefore considered highly likely to comprise common and widespread species.

Reptiles

- 4.2.19 Common reptiles such as common lizard *Zootoca vivipara* and slow worm *Anguis fragilis* could be present in the wider area due to the suitable habitat of connecting woodland and heathland habitats in the wider landscape. However, the habitat on Site, being mostly regularly mown grassland, is unsuitable for reptiles as it has very limited refuge and poor foraging opportunities. If present, reptiles would likely be in low numbers around the periphery of the Site or in dry ditches where taller vegetation may offer some refuge.

Riparian mammals

- 4.2.20 There were no water bodies on Site and the ditches on Site are likely to be dry for most of the year; therefore, riparian mammals such as water vole *Arvicola amphibius* and otter *Lutra lutra* are unlikely to be present.

Other notable mammals

- 4.2.21 The Site may be used by hedgehog *Erinaceus europaeus*, although it is considered poor habitat suitability due to limited foraging opportunities and lack of refuges.

5. Assessment of Potential Impacts

5.1 Overview

- 5.1.1 There is anticipated to be no change in operation of the Site as a result of the Proposed Development, as no development works are proposed and the Site will continue to function as temporary asylum accommodation in accordance with the Extant Consent, except for building 19 which will be handed back to the MoD for use by Army Cadets going forward and excluded from the Site and the Proposed Development.
- 5.1.2 Potential effects on designated sites, habitats and species from operation of the Proposed Development include potential for habitat degradation e.g. by trampling or pollution, habitat loss e.g. from accidental spread of fire, visual or noise disturbance and spread of invasive non-native plant species.

5.2 Ashdown Forest

- 5.2.1 There will be no direct loss or fragmentation of Ashdown Forest SAC/SPA/SSSI habitats, which are also unlikely to be indirectly affected by any operational impacts such as pollution, due to distance, lack of hydrological connection, existing standard pollution prevention and waste management controls and existing infrastructure. Fire (e.g. accidentally caused by cigarettes) could affect Ashdown Forest if wildfire spreads, however the grassland on Site is kept very short by regular mowing which would minimise the amount of combustible fuel and should greatly reduce the risk of wildfire. Recreational impacts could have adverse effects on Ashdown Forest, however there is not anticipated to be an increase in resident numbers to what was previously present on the Site, therefore there is not anticipated to be an increase in visitor/recreational pressure.
- 5.2.2 Habitats on Site are unsuitable for Dartford warbler and European nightjar (which are designated features of the SPA). Great crested newt (which are a designated feature of the SAC) may use terrestrial habitat within the Site, albeit in low numbers. However, there are no construction works associated with the Proposed Development and there will be no removal of suitable habitat or works directly to any ponds. As such there are no likely significant effects as a result of this impact pathway coupled with the distance to potential Dartford warbler and European nightjar habitat, and the presence of intervening woodland creating separation from the SPA interest features, disturbance is considered negligible. A Habitat Regulations Assessment (HRA) Stage 1 Screening has been produced by [REDACTED] (2026) (Ref. 7) which fully details the assessment and concludes no likely significant effects.
- 5.2.3 The HRA report was issued to Natural England and a meeting was held with Natural England on 5th August 2026. The subsequent letter issued by Natural England (dated 5th August) (Ref. 8) states that Natural England concur with the findings of the HRA report and agree that significant effects on Ashdown Forest SAC and SPA are unlikely to occur, either alone or in combination.

5.3 Habitats

- 5.3.1 No direct habitat loss is proposed given that the Proposed Development does not include any development works. The majority of habitat on Site is 'other neutral grassland' which is a relatively common and widespread habitat type and was not considered of high ecological value nor particularly sensitive to human activity such as trampling. The grassland was not species-rich and is likely to benefit from continued regular mowing and removal of arisings. The woodland was fenced off and therefore its habitats and species are unlikely to be affected by human activity. The scattered trees on Site generally appeared to be healthy and showed no sign of damage. As stated above, the risk of wildfire spread (e.g. from cigarettes) is anticipated to continue to be mitigated by keeping the grassland very short by regular mowing to prevent spread of fire. Existing waste management and pollution prevention controls in place on Site would continue to mitigate potential habitat degradation. Therefore, no significant adverse effects on habitats on Site during operation of the Proposed Development are anticipated.

- 5.3.2 Great crested newt and hazel dormice may be present on Site, albeit likely in low numbers and restricted to limited areas of suitable habitat. Trees and buildings on Site were potentially suitable to support nesting birds and roosting bats. Any new development, such as installation of new lighting, habitat clearance or building works could affect species such as nesting birds, dormice or roosting bats if their habitat is affected or if works cause noise, visual or vibration disturbance. However, as no development works are proposed no adverse effects on protected or notable species are anticipated.
- 5.3.3 Rhododendron and cotoneaster were identified on Site, which appeared to be *Rhododendron ponticum* and *Cotoneaster simonsii*, that are non-native invasive plant species listed on Schedule 9 of the Wildlife and Countryside Act (1981 as amended). They were found in two areas of landscape planting and therefore potentially planted prior to their inclusion on the Schedule 9 list of non-native invasive species. A single small stand of rhododendron was also identified on the roadside near to the Site entrance. Although a dedicated invasive species survey was not carried out, there were no other stands of rhododendron or cotoneaster identified on Site which is considered likely due to their location, being in landscaped planting areas separated by roads or in areas of hard-standing separated from semi-natural habitats, which has prevented their spread. No changes which may increase the spread of these invasive non-native plant species are anticipated as part of the Proposed Development, however there is still a risk of their spread (i.e. the risk of their spread remains the same due to their presence on Site).

6. Conclusions

- 6.1.1 There is anticipated to be no development and no change to operation of the existing Site as a result of the Proposed Development.
- 6.1.2 As such, no likely significant effects are anticipated to Ashdown Forest SAC/SPA/SSSI (details of this assessment are presented in the Habitats Regulations Assessment: Screening report (██████ 2026) Ref. 7).
- 6.1.3 The habitats on Site are mostly common and widespread and there is not anticipated to be any significant adverse effects to habitats during operation of the Proposed Development. Protected species, such as great crested newt, may be present on Site, albeit in low numbers in taller vegetation around the periphery of the Site or in dry ditches. Hazel dormice may also be using tree canopies on Site where they connect to the wider landscape. Trees and buildings on Site are potentially suitable for nesting birds and roosting bats. However, as no development works are proposed, no adverse effects on habitats, protected or notable species are anticipated by the operation of the Proposed Development.
- 6.1.4 Should any future works be proposed on the Site, such as installation of additional external lighting (potential effects on nocturnal species), tree clearance or pruning, building refurbishment (such as roof refurbishment) or construction (including extension works), then the effects on habitats and potential effects on protected and notable species would need to be considered i.e. bat roost surveys and/or nesting bird checks may need to be carried out prior to works being undertaken or habitat clearance works may need to be carried out under precautionary working method statements to avoid harm to protected species and avoid risk of a legal offence. Potential effects on the Ashdown Forest SAC/SPA/SSSI would also need to be considered (such as any potential increase in recreational pressure or risk of wildfire) if there were to be a net increase in residents.
- 6.1.5 Rhododendron and cotoneaster were identified on Site, which appeared to be *Rhododendron ponticum* and *Cotoneaster simonsii*, that are non-native invasive plant species listed on Schedule 9 of the Wildlife and Countryside Act (1981 as amended). It is an offence to allow these species to spread into the wild. Although no changes which may exacerbate the spread of rhododendron and cotoneaster are anticipated as part of the Proposed Development, it is recommended that these non-native plant species are appropriately controlled and/or appropriately disposed of to eliminate the risk of their potential spread into the wild.

7. References

- Ref. 1 Ministry of Housing, Communities and Local Government (2026) National Planning Practice Framework [online] Available at:
https://assets.publishing.service.gov.uk/media/6a8334c03bd75b81e2329ac4/National_Planning_Policy_Framework.pdf
- Ref. 2 Wealden District Core Strategy Local Plan (February 2013). Available online:
<https://www.wealden.gov.uk/planning-and-building-control/planning-policy/adopted-local-plan-documents/core-strategy-local-plan/>
- Ref. 3 Adopted Wealden Local Plan (1998). Available online:
<https://www.wealden.gov.uk/UploadedFiles/Chapter04.PDF>
- Ref. 4 Department for Environment, Flood and Rural Affairs (Defra), Magic interactive online map. Accessed August 2026. Available on-line: <https://magic.defra.gov.uk/MagicMap.html>
- Ref. 5 UKHab Ltd (2026) UK Habitat Classification Documents V2.1
- Ref. 6 Wildlife and Countryside Act 1981 as amended.
- Ref. 7 [REDACTED] (2026) Proposals at Former Training Camp, Crowborough: Habitat Regulations Assessment (Home Office). July 2026. [REDACTED]
- Ref. 8 Natural England (2026) Letter dated 5th August 2026, Planning Consultation: HRA and EIA Screening – Temporary accommodation extension in the period of use to 2030 for up to 540 asylum applicants.

Appendix A Figures

PROJECT

Crowborough Army Training
Camp

CLIENT

Home Office

CONSULTANT

LEGEND

- Site Boundary
- Land Ownership Boundary

NOTES

© Crown copyright and database rights 2026
Ordnance Survey AC0000808122.

Drawings prepared solely for planning
purposes. The accuracy of
information accrued from this drawing set
should not be relied upon for construction
purposes in absence of Measured Building
Survey.

All information on this figure has been
indicatively captured.

ISSUE PURPOSE

For Approval

PROJECT NUMBER

60790127

DRAWING NUMBER

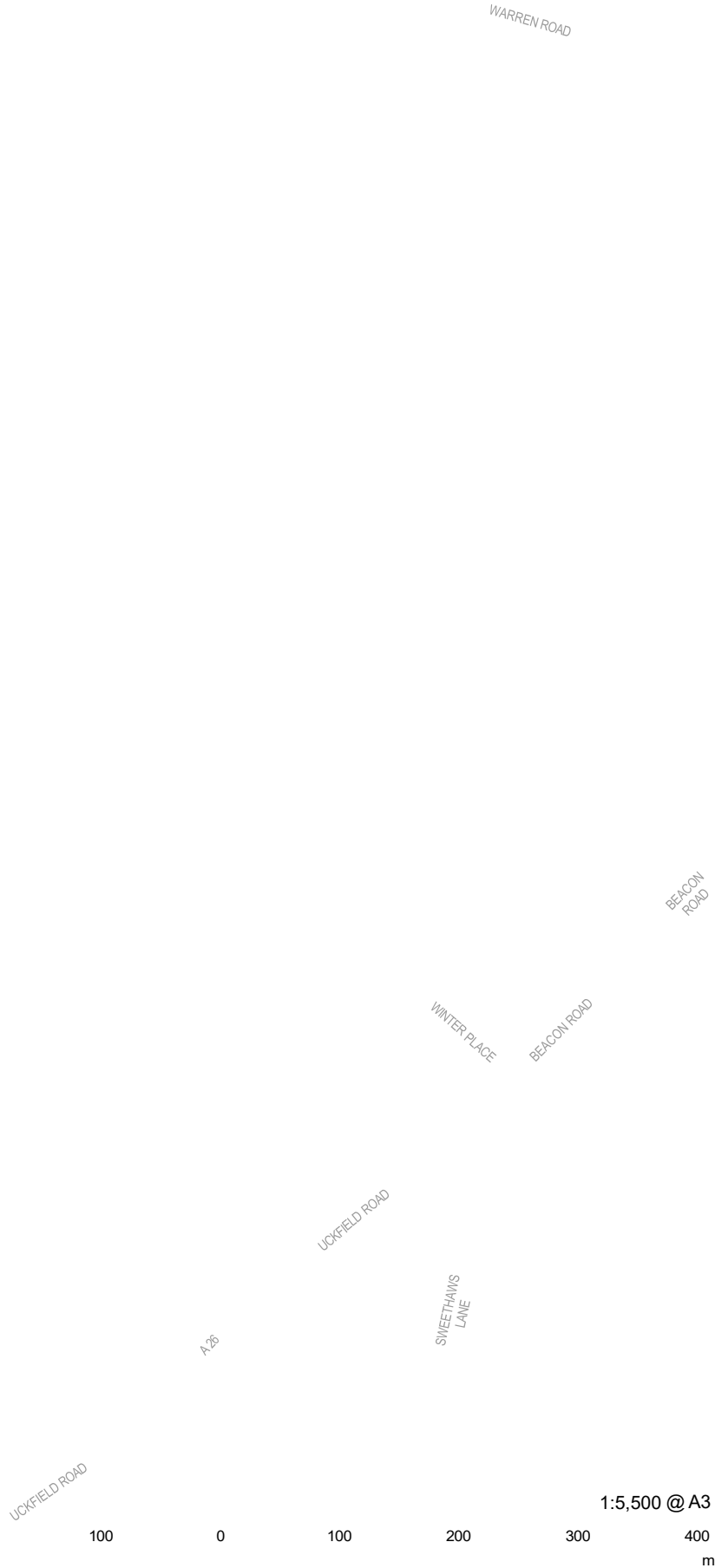
60790127-00000000-XX-XX-DR-
EN-000001-OS Rev 01

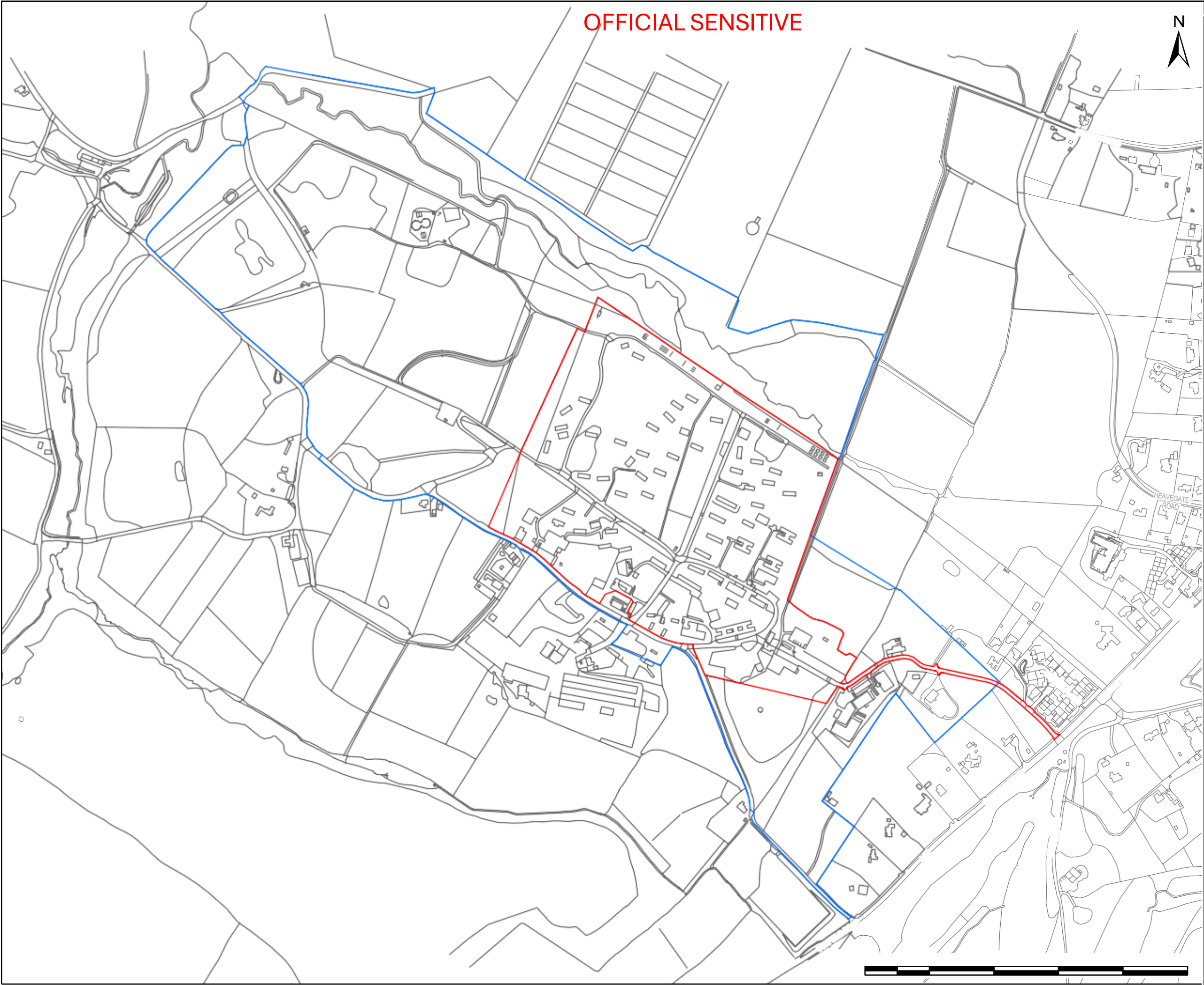
FIGURE TITLE

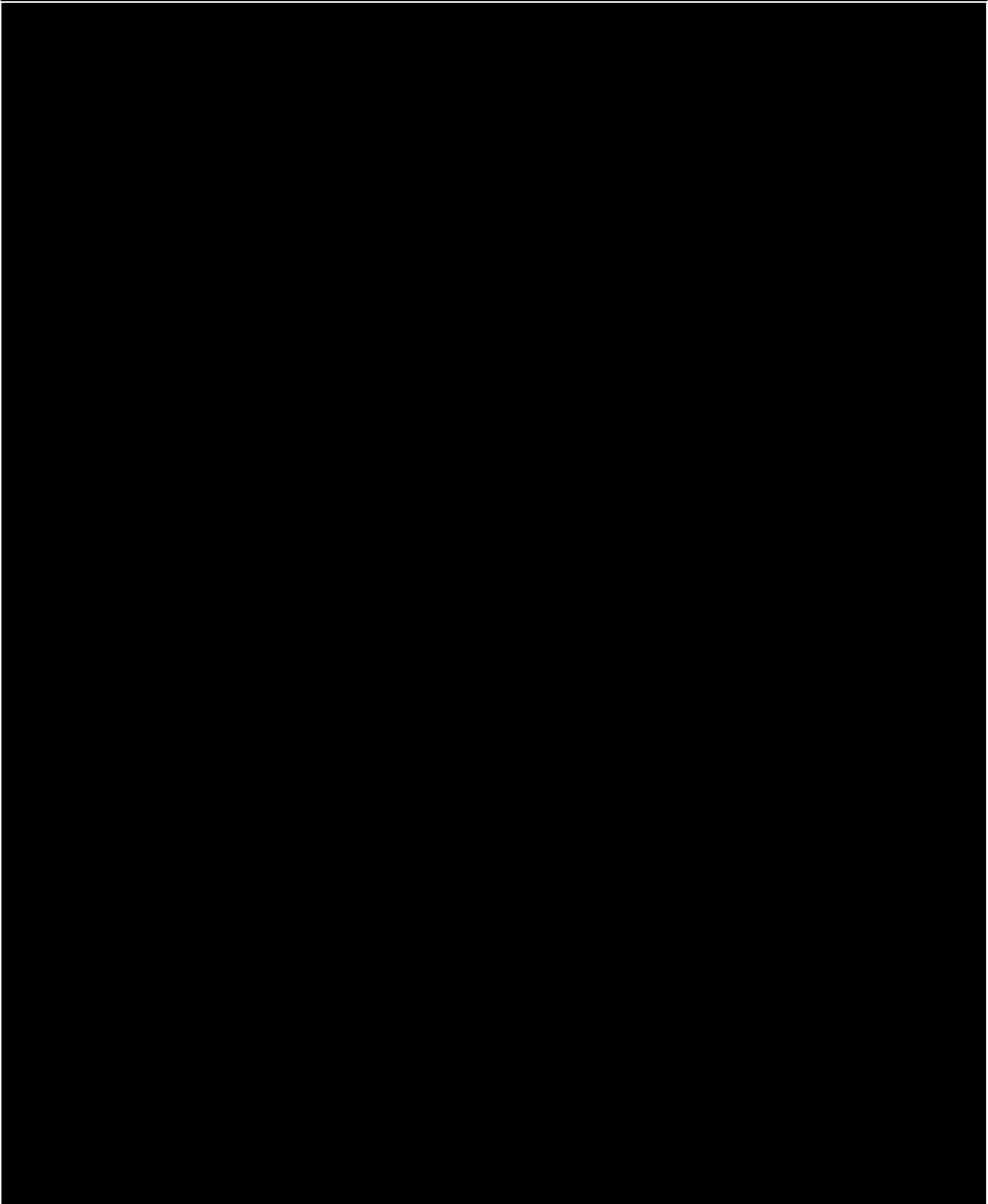
Site Location Plan

FIGURE NUMBER

Figure 1







PROJECT

AAP003

CLIENT

Home Office

CONSULTANT

LEGEND

Site Boundary
Target Note

NOTES

© Crown copyright and database rights 2026
Ordnance Survey AC0000808122. Microsoft,
Vantor.

ISSUE PURPOSE

For Information

PROJECT NUMBER

60790127

FIGURE TITLE

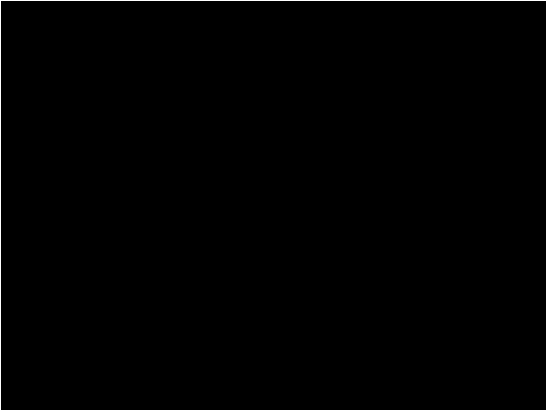
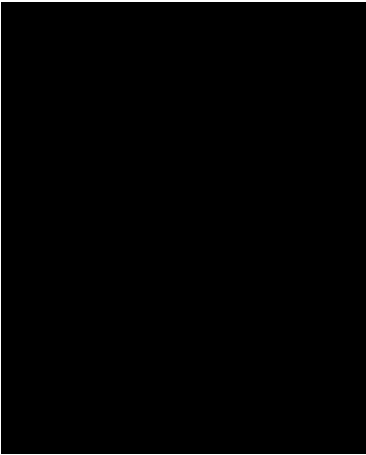
Aerial View of Site with Target Notes
from the Ecological Walkover Survey

FIGURE NUMBER

Figure 1

Appendix B Target Notes

Table A.1: Target notes from Site Plan

Target Note	Description and Figure
TN1	
TN2	Example group of mature and semi-mature trees 
TN3	Dead tree (T2) with potential bat roost features (with both PRFI features– suitable for individual bats and also PRF-M features- suitable for multiple bats) 

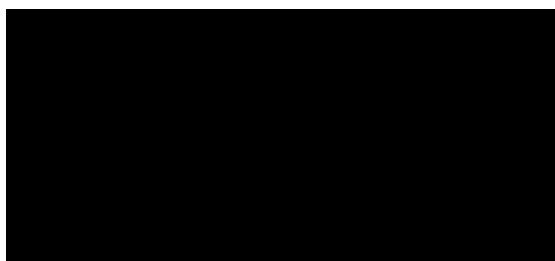
TN4

Dead tree (T1) with potential bat roost features (PRF-M features - suitable for multiple bats)



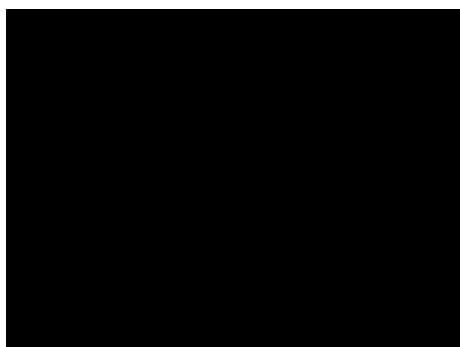
TN5

Cotoneaster



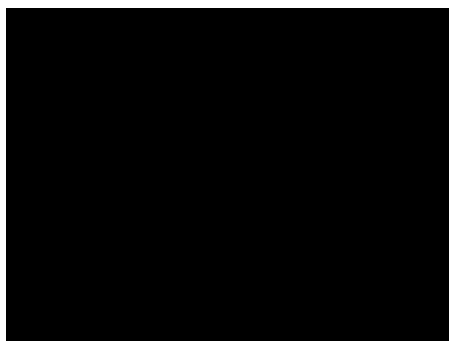
TN6

Rhododendron (first location where a group of plants were identified)



TN7

One of the locations where lighting towers were present



TN8

Rhododendron (second location, a small stand was identified)

