



Date: 11 November 2025

Our ref: 09410

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

Thank you for requesting advice on this discharge of condition 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. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DM/25/2303
Location: Queen Victoria Hospital Holtye Road East Grinstead West Sussex
Proposal: Discharge of Statutory Biodiversity Net Gain condition relating to planning application DM/25/0396

Thank you for consulting Place Services on the above discharge of condition for the Biodiversity Gain Condition

Biodiversity Gain Condition

Comments

We have reviewed the submitted documents for this application. This includes the following:

- Environment Bank – Biodiversity Unit Purchase Certificate (16/7/2025) - BGS-281024001
- Environment Bank – Biodiversity Unit Purchase Certificate (16/7/2025) - BGS-191124001
- Biodiversity Gain Plan
- Statutory Biodiversity Metric – Calculation Tool (January 2025)
- Biodiversity Net Gain Design Stage Report (Mott Macdonald, January 2025) – Submitted at application stage



It is indicated that [Paragraph 14\(2\) of Schedule 7A of the Town and Country Planning Act 1990 \(as amended\)](#) and [Articles 37C\(2\) and 37C\(4\) of The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#) sets out the requirements of the Biodiversity Gain Condition, which secures a 'Biodiversity Gain Plan'.

Therefore, in summary, the submission of a Biodiversity Gain Plan will consist of the following information:

- A Biodiversity Gain Plan form (Ideally using the Government's template: <https://www.gov.uk/government/publications/biodiversity-gain-plan>)
- The completed biodiversity metric - calculation tool (& condition assessment if using Statutory Biodiversity Metric – Calculation Tool)
- Completed pre-development and post-development habitat maps
- A Habitat management and monitoring plan (for [significant on-site enhancements](#) or off-site measures in land owned by the applicant)
- Legal agreement for monitoring and management of significant on-site enhancements or off-site measures in land owned by the applicant (if required by the LPA).

If off-site biodiversity units are proposed, then evidence of registration / allocation onto the [biodiversity gain site register](#) will be required (if using blue line boundary land or a separate off-site provider). If [Statutory Biodiversity Credits](#) from the Government are proposed, then proof of purchase will be required.

Therefore, based on the submitted documents, we have the following comments:

The applicant has not provided an accurate case for the on-site post-intervention values. They have instead made the assumption that all habitats on-site will be lost and the site will consist of 'developed land; sealed surface' which contains no biodiversity value. Therefore, this could be updated to demonstrate that a reduced biodiversity net gain requirement will be required, via the submission of a post-intervention habitat map and updated metric.

Nevertheless, to address the loss of the on-site biodiversity units, the Statutory Biodiversity Metric – Calculation Tool shows that 1.31 habitat units will be secured off-site, which will be delivered by creation of Other neutral grassland in good condition. This will be secured via the habitat bank - BGS-281024001.

In addition, a further 1.81 habitat units will be secured off-site, via the delivered via enhancement of Modified grassland in Poor condition to Lowland meadow in Good condition. This will be secured via the habitat bank - BGS-191124001. This combined result in a total unit requirement of 2.53 habitat units.

Furthermore, a total of 0.06 hedgerow units will be secured off-site, via hedgerow enhancement via the habitat bank - BGS-281024001.

As a result, we have checked the Biodiversity Gain Site Register to confirm whether the units secured match the requirement set out within the Statutory Biodiversity Metric – Calculation Tool. This confirmed that there appears to be a mistake with the units secured for the habitat

bank 'BGS-281024001', as only 1.03 habitat units have been secured and not 1.31 habitat units. The area appears to be correct on the Biodiversity Gain Site Register. Nevertheless, we still seek clarification that the correct habitat units have been secured and that the register is updated accordingly to ensure that a 10% measurable biodiversity net gain can be demonstrated.

Recommendation

We are unable to recommend the discharge of the Biodiversity Gain Condition until the additional information outlined above has been provided.

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

Yours sincerely,

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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.