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Mid Sussex District Council
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Our ref: 03571
Date: 28 April 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/25/0590
Location: Little Reeds Farm London Road Hickstead Haywards Heath
Proposal: Engineering works: 5m high earth noise bund with associated landscaping

Thank you for re-consulting Place Services on the above application

No ecological objection	☐
Recommend approval subject to attached conditions	☐
Further information required/Temporary holding objection: Mandatory Biodiversity Net Gains	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐

Summary

We have reviewed the documents supplied by the applicant, including the Ecological Impact Assessment (The Ecology Co-op Ltd, January 2023) and the Advice Note (The Ecology Co-op Ltd, May 2024) relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation.

We have also reviewed the information available regarding biodiversity net gains for this application, which includes Biodiversity Impact Calculation (The Ecology Co-op Ltd, March 2025).

We have also reviewed the further information relating to bespoke biodiversity enhancements for species, which includes the Ecological Enhancement Measures (Weller Designs Ltd, November 2025).

We are still not satisfied that appropriate information with regard to mandatory biodiversity net gains has been supplied for the application prior to determination. The reasons for this are outlined below:

Mandatory Biodiversity Net Gains:

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 and Paragraph: 011 Reference ID: 74-011-20240214 sets out what information should be submitted as part of a planning application if the statutory biodiversity gain condition applies.

As a result, we are not satisfied that appropriate information has been provided prior to determination. This is because of the reasons set out below:

- Place Services have requested the submission of a Statutory Biodiversity Metric – Calculation Tool from the Council on the 11/06/25 and 02/10/25. The further Biodiversity Impact Calculation (The Ecology Co-op Ltd, March 2025) provides an overview summary of the calculations and the associated condition assessment. However, the Statutory Biodiversity Metric – Calculation Tool (Excel spreadsheet) still needs to be submitted to ensure that an appropriate baseline consideration have been provided for this application.

Where mandatory biodiversity net gains apply, the planning authority will be required to secure a biodiversity gain condition as a pre-commencement requirement. The biodiversity gain condition has its own separate statutory basis, as a planning condition under [paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990](#) and should be included as an informative within the decision notice. The biodiversity gain

condition should secure the provision of a Biodiversity Gain Plan prior to commencement, which includes the following:

- a) A Biodiversity Gain Plan form (Ideally using the Government's template: <https://www.gov.uk/government/publications/biodiversity-gain-plan>)
- b) The completed metric calculation tool showing the calculations of the pre-development and post-intervention biodiversity values.
- c) Pre and post development habitat plans.
- d) Legal agreement(s)
- e) Biodiversity Gain Site Register reference numbers (if using off-site units).
- f) Proof of purchase (if buying statutory biodiversity credits at a last resort).

In addition, a [Habitat Management and Monitoring Plan](#) (HMMP) should be secured for all [significant on-site enhancements](#). The decision on whether significant on-site enhancements are present is ultimately up to the Council. Where present, the maintenance and monitoring of significant on-site enhancements should be secured via planning obligation for a period of up to 30 years from the completion of development. This will be required to be submitted concurrent with the discharge of the biodiversity gain condition.

Additional comments – Bespoke biodiversity enhancements:

We welcome the provision of the Ecological Enhancement Measures (Weller Designs Ltd, November 2025). This provides appropriate technical specification of the bird and bat boxes and hibernacula, as well as suitable locations for the proposed reasonable biodiversity enhancements. As a result, we are satisfied that a Biodiversity Enhancement Strategy does not need to be secured as a condition of any consent, subject to the measures contained within the Ecological Enhancement Measures (Weller Designs Ltd, November 2025) being secured and implemented in full.

We look forward to working with the LPA and the applicant to receive the additional information required to support a lawful decision and overcome our holding objection.

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

Your 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.