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West Sussex
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Our ref: 15958
Date: 19 May 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/26/0669
Location: East Grinstead Sports Club Sports Field Saint Hill Road East Grinstead
Proposal: Formation of Essential Additional Vehicle Parking at Multidiscipline Sports Facility

Thank you for 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 Preliminary Ecological Appraisal (JWK Wildlife Surveys, March 2026) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures and mandatory Biodiversity Net Gain.

We have also reviewed the information submitted relating to mandatory biodiversity net gains, including the Statutory Biodiversity Metric – Calculation Tool (March 2026), Habitat Condition Sheets and Offsite Post Intervention Habitat Condition Sheets, the on-site baseline map (March 2026), the on-site post-intervention habitats map (March 2026), Off-site Baseline map (March 2026), off-site post-intervention habitats map (March 2026).

We are 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 have reviewed the submitted information and are not satisfied that appropriate information has been provided prior to determination for the pre-development baseline. This is because of the reasons set out below:

- The Statutory Biodiversity Metric – Calculation Tool has recorded the grassland on-site as containing ‘Other neutral grassland’ in poor condition. However, the Preliminary Ecological Appraisal (JWK Wildlife Surveys, March 2026), baseline habitat map and condition assessment records the grassland as modified grassland in moderate condition. As a result, it is recommended that the Statutory Biodiversity Metric – Calculation Tool and associated BNG information is updated to reflect the relevant grassland habitat type for the pre-development baseline.

With regard to mandatory biodiversity net gains, it is highlighted that we support the submitted Biodiversity Net Gain Assessment (JWK Wildlife Surveys, January 2026), Statutory Biodiversity Metric – Calculation Tool (February 2026), Habitat Condition Sheets and Offsite Post Intervention Habitat Condition Sheets. Biodiversity net gains is a statutory

requirement set out under [Schedule 7A \(Biodiversity Gain in England\) of the Town and Country Planning Act 1990](#) and we are satisfied that submitted information provides sufficient information at application stage. As a result, a Biodiversity Gain Plan should be submitted prior to commencement, which also 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](#). However, we are satisfied that significant on-site enhancements are not proposed for this application. As a result, we are satisfied an HMMP for significant on-site enhancements will not be required for the Biodiversity Gain Plan.

However, it is recommended that the following matters will need to be considered by the applicant as part of the biodiversity gain condition:

- We note that the applicant is proposing to secure off-site enhancements in blue line boundary. Therefore, any off-site enhancements will need to be secured by a legal agreement with the Council as part of the Biodiversity Gain Condition and will also require a Habitat Management and Monitoring Plan to set out the aftercare and monitoring strategy for the 30-year period from the completion of development. Evidence that the site has been registered on the [Biodiversity Gain Site Register](#) must also be provided prior to the discharge of the Biodiversity Gain Condition. As a result, it is recommended that the applicant explores securing off-site habitat units via a habitat bank registered on the Biodiversity Gain Site Register in the first instance.
- We query the proposal to enhance the off-site 'other neutral grassland' to 'Lowland meadow'. This is because this habitat contains a very high distinctiveness and is an extremely difficult habitat to create. The habitat requires 16 species per m² with species that reflect specific grassland communities (e.g. NVC MG5), with at least four positive indicators for lowland meadows present within the sward. Therefore, further clarification with regard to the soil type and phosphorus levels should be provided to justify whether this habitat is realistic and achievable, alongside information on how the ground will be nutrient stripped and prepared before implementation. Furthermore, a pre-requisite of the planting should be the sowing of green hay on proposed habitat location, ideally from a local source. As a result, if this is not considered deliverable, the off-site habitat should be changed to 'Other neutral grassland' enhancement to good condition.

However, this would also result in a 10% measurable biodiversity net gain not being achieved for habitat units.

Additional Comment:

We note that the proposal is immediately adjacent to ancient woodland (irreplaceable habitat). However, the proposals will contain a 15-metre buffer from the woodland in line with [Government standing advice](#) and the Preliminary Ecological Appraisal (JWK Wildlife Surveys, March 2026) states that no lighting will be proposed. As a result, we are satisfied that direct and indirect impacts upon the ancient woodland can be avoided.

We are also satisfied that impacts upon protected and Priority species can be avoided with the mitigation contained within the Preliminary Ecological Appraisal (JWK Wildlife Surveys, March 2026) secured. However, please note that we have no comments on Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the [NatureSpace Partnership](#).

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.

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.