



Date: 6 October 2026
Our ref: 22837

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

By email only: 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/26/2163
Location: Land South And West Of Imberhorne Upper School Imberhorne Lane East Grinstead West Sussex
Proposal: Reserved Matters application for a retirement living scheme (Use Class C2) for 134 dwellings at Land West of Imberhorne Lane. The Reserved Matters include appearance, landscape, layout and scale, pursuant to outline approval DM/23/2699. Also to include details to address condition no. 24 relevant to the Care Community element of DM/23/2699.

Thank you for consulting Place Services on the above application.

No ecological objection	☐
Recommend approval subject to attached conditions	☐
Further information required	☒
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. This includes consideration of the following reports:

- Biodiversity Net Gain Assessment (The Ecology Partnership, August 2026) (which contains Figure 6: Baseline habitats 2026 and Figure 7: Proposed habitats)
- Statutory Biodiversity Metric (August 2026)
- External Lighting Design Strategy (Whichelo Design Studio, August 2026)
- Landscape GA Plan

As a result, we have the following comments:

Soft landscaping:

The application is not supported by detailed soft landscaping measures, including planting schedules and specifications. As a result, we would expect this to be provided to meet the requirements of Condition 18 of the outline consent of DM/23/2699.

External Lighting:

We have reviewed the External Lighting Design Strategy (Whichelo Design Studio, August 2026) and welcome the inclusion of guidance from the Institute of Lighting Professional Guidance Note 08/18. However, we recommend that this is updated to [Guidance Note:08/23 \(Institute of Lighting Professionals\)](#) and that a detailed lighting plan is provided, showing the light spill, the type of lights to be installed, the temperatures emitted and the areas to be protected on this site, such as hedgerows and trees.

This will need to be provided prior to the discharge of Condition 41.

Other ecology considerations:

We have reviewed the decision notice for outline approval of DM/23/2699 and note that the following conditions require submission of the specified documents:

- **Condition 31:** Construction Environmental Management Plan (CEMP: Biodiversity)
- **Condition 37:** Site protection plan for the watercourse and ancient woodland
- **Condition 39:** Compliance condition for the following ecological reports:
 - Tree Roost Assessment and Tree Climbing Assessment (Ecology Partnership, December 2024)
 - Bat Preliminary Ground Level Tree Roost Assessment (Ecology Partnership, October 2024)
 - Dormouse Review (Ecology Partnership, August 2024)
 - Update Ecological Walkover Technical Note (Ecology Partnership, July 2024)
 - ES Biodiversity Chapter Oct 2023

- Appendix 8.13: Further Update Preliminary Ecological Appraisal (2021) The Ecology Partnership
- Appendix 8.14: Preliminary Ecological Appraisal of Proposed SANGS Land (2021) The Ecology Partnership
- Appendix 8.12: Reptile Surveys (2019) The Ecology Partnership
- Appendix 8.11: Dormouse Surveys (2019) The Ecology Partnership
- Appendix 8.10: Badger Survey (2018) The Ecology Partnership
- Appendix 8.8: Bat Activity Surveys (2018) The Ecology Partnership
- Appendix 8.7: Update Preliminary Ecological Appraisal (2018) The Ecology Partnership
- Appendix 8.6: Breeding Bird Surveys (2017) The Ecology Partnership
- Appendix 8.5: Reptile Surveys (2016) The Ecology Partnership
- Appendix 8.4: Environmental DNA Surveys (2016) The Ecology Partnership
- Appendix 8.3: Dormouse Surveys (2016) The Ecology Partnership
- Appendix 8.2: Bat Activity Surveys (2016) The Ecology Partnership
- Appendix 8.1: Preliminary Ecological Appraisal (2016) The Ecology Partnership
- **Condition 40:** Farmland Bird Compensation Strategy
- **Condition 42:** Updated ecological surveys if the development does not commence within 12 months of the planning consent (permission granted 23rd December 2025).

As a result, we look forward to this additional information being provided via separate planning application.

Biodiversity Net Gains:

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:

- Biodiversity Gain Plan form, using the Government's template: <https://www.gov.uk/government/publications/biodiversity-gain-plan>
- The completed metric calculation tool showing the calculations of the pre-development and post-intervention biodiversity values.
- Completed pre-development and post-development habitat maps
- Information regarding [Habitat degradation](#) (where required).
- Information regarding [Irreplaceable habitat](#) (where required).

In addition, the following information may also be required depending on whether the development contains significant on-site enhancements or whether off-site options or Statutory Biodiversity Credits are required:

- A [Habitat Management and Monitoring Plan](#) (HMMP) for significant on-site enhancements or offsite measures in blue line boundary land.
- Legal agreement for monitoring and management of significant on-site enhancements or off-site measures in blue line boundary land.
- Evidence of off-site units being allocated to a Biodiversity Gain Site on the [Biodiversity Gain Site Register](#).
- Evidence of proof of purchase of Statutory Biodiversity Credits

However, it is highlighted that the original application was submitted to the Local Planning Authority (LPA) before mandatory Biodiversity Net Gain (BNG) requirements came into force. Therefore, the statutory Biodiversity Gain Condition does not apply to this application.

Nevertheless, measurable biodiversity net gains should still be demonstrated to ensure compliance with local planning policy requirements under policy DP38 (Biodiversity) of the adopted local plan.

Furthermore, as the proposals will result in the loss of medium distinctiveness habitats, a total of 6.24 medium distinctiveness grassland units (or units of a higher habitat distinctiveness category, where appropriate) will need to be secured to satisfy the BNG trading rules. Evidence demonstrating the purchase and allocation of these off-site units should be provided to the LPA.

Bespoke biodiversity measures:

We would expect reasonable biodiversity measures for protected, Priority and threatened species to be provided for this application, as this has not been secured as part of the outline consent.

The provision of reasonable biodiversity measures is outlined in National Policy N2 1(f) of the National Planning Policy Framework (August 2026). Reasonable biodiversity measures are a separate matter to mandatory biodiversity net gains, securing bespoke measures for species (e.g. integrated bird or bat boxes). As a result, if the LPA is minded to grant consent for this application, we recommend that the finalised details should be outlined within a separate Biodiversity Measures Strategy to be secured as a condition of any consent.

An example condition which could be included as part of the reserved matters consent is outlined below:

1. PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY MEASURES STRATEGY

“Prior to any works above slab level, a Biodiversity Measures Strategy for protected, Priority and threatened species, prepared by a suitably qualified

ecologist, shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Measures Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed measures or features;*
- b) detailed designs or product descriptions to achieve stated objectives;*
- c) locations of proposed measures or features by appropriate maps and plans (where relevant);*
- d) persons responsible for implementing the measures or features; and*
- e) details of initial aftercare and long-term maintenance (where relevant).*

The works shall be implemented in accordance with the approved details shall be retained in that manner thereafter.”

Reason: To support protected, Priority and threatened species and allow the LPA to discharge its duties under National Policy N2 1(f) of NPPF August 2026 and s40 of the NERC Act 2006 (as amended).

Please do not hesitate to 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.

Place Services have a policy relating to the use of AI. Unless otherwise stipulated, any AI use will be limited to basic proof-reading, grammar, and spelling correction. This response has been reviewed by the author(s). If you have any queries, please [contact us](#) for information about our AI guidance.



Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
www.placeservices.co.uk

