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

Our ref: 09721
Date: 26 February 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/25/1050
Location: Land Adj. To Barn Cottage Cuckfield Road Ansty Haywards Heath
Proposal: Proposal to erect a single four-bedroom house in land adjoining Barn Cottage (Additional BNG and Ground Level Tree Assessment Received 18.12.2025).

Thank you for further 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 Ground Level Tree Assessment (JWK Wildlife Surveys, December 2025) supplied by the applicant, 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 submitted relating to mandatory biodiversity net gains, including the Biodiversity Gain Plan (Places Architects Ltd., February 2026), Baseline Map and Post-development Map (submitted February 2026) and Small Sites Statutory Biodiversity Metric – Calculation Tool (revised February 2026). The Biodiversity Impact Calculation (The Ecology Co-op, December 2025) was previously submitted.

As stated in our response dated 29th January 2026, we are now satisfied that there is sufficient ecological information available for determination of this application. However, 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 reason for this is 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 Biodiversity Gain Plan (Places Architects Ltd., February 2026), Baseline Map and Post-development Map (submitted February 2026) and Small Sites Statutory Biodiversity Metric – Calculation Tool (revised February 2026) and are still not satisfied that appropriate information has been provided prior to determination. This is because of the reason set out below:

- We welcome the inclusion of the two Medium trees with stem diameter greater than 30cm, two tree groups with unknown stem diameters, and four hedgerows on the Baseline Map and Post-development Map (submitted February 2026). We also note that the native hedgerow has now been included in the Small Sites Statutory Biodiversity Metric – Calculation Tool (revised February 2026). However, it does not appear that the Small Sites Statutory Biodiversity Metric – Calculation Tool (revised February 2026) has been amended to include the two Medium trees and two tree

groups of unknown stem diameters. Therefore, this needs to be included in an updated Small Site Metric – Calculation Tool.

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](#). However, we understand that Mid Sussex District Council's position is that significant on-site enhancements do not apply for minor development. Therefore, a HMMP or legal agreement is not expected for this application.

Additional comments:

We note from the Ground Level Tree Assessment (JWK Wildlife Surveys, December 2025) that tree T001 Common Lime and T010 Sycamore have Potential Roost Features for individual bats (PRF-Is). Therefore, we highlight that appropriate compensation will be required in advance of works to avoid loss of roost resource (Reason and Wray (2023) UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1. Chartered Institute of Ecology and Environmental Management). We also highlight that the works need to be undertaken under a non-licensed Precautionary Working Method Statement, which includes inspection of any affected trees by endoscope on the day and felling under the supervision of a licensed bat ecologist, as required in Table 6.3 of 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023).

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Ground Level Tree Assessment (JWK Wildlife Surveys, December 2025) to secure net gains for biodiversity, as outlined under Paragraph 187d and 193d of the National Planning Policy Framework (December 2024). The reasonable biodiversity enhancement measures should be outlined

within a separate Biodiversity Enhancement Strategy and should be secured by a condition of any consent.

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 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.