



Date: 24 July 2026
Our ref: 13218

Hamish Evans
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/25/2046
Location: Evergreen London Road Hassocks West Sussex
Proposal: Outline planning application for 4 detached dwellings, two of which have separate garage blocks.

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 on: 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 (Urban Edge Environmental Consulting, March 2026), Reptile Survey Report (Environmental Assessment Services Ltd., June 2026), Preliminary Ecological Appraisal (Urban Edge Environmental Consulting, 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 Statutory Biodiversity Metric – Calculation Tool (December 2025). We note that Appendix I of the Preliminary Ecological Appraisal (Urban Edge Environmental Consulting, March 2026) comprises the UKHab Habitats Plan. Please note that the Biodiversity Net Gain Report submitted 18th June 2026 is a pdf version of the Statutory Biodiversity Metric – Calculation Tool (December 2025), which is not acceptable.

We are still not satisfied that there is sufficient ecological information available for determination of this application and recommend that additional information on Mandatory Biodiversity Net Gain is provided prior to determination.

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 stated in our response dated 4th February 2026, we are not satisfied that appropriate information has been provided prior to determination. This is because of the reasons set out below:

- No condition assessments have been provided of the site, and the species list provided for the modified grassland has 14 total species. Photographs show a patch of grassland which has a distinctly taller sward height than the majority of the

grassland. We recommend that condition assessment sheets and quadrat results are provided for the modified grassland, to allow us to assess whether condition assessments have been completed accurately, and whether the distinct patch of grassland should be classified separately.

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.

As a result, a Biodiversity Gain Plan should be submitted prior to commencement which should include the following information for non-phased development:

- 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 Mid Sussex do not consider significant on-site enhancements are present for minor development. Therefore, we are satisfied that a HMMP and legal agreement will not be required for on-site measures.

As no post-intervention values have been submitted, we cannot provide any comment on whether the measures will be suitable to meet the Biodiversity Gain Condition.

Additional Comments:

We understand from the Preliminary Ecological Appraisal (Urban Edge Environmental Consulting, March 2026) that there are no buildings on site and that none of the trees on

site have Potential Roost Features (PRFs) for bats. Therefore, we agree that no further surveys for bats are required.

As sections of Hedgerow H1 will be removed, we support the non-licensed Precautionary Method Statement for Hazel Dormouse in Section 5.3 R4 of the Preliminary Ecological Appraisal (Urban Edge Environmental Consulting, March 2026). This needs to be secured by a condition of any consent and implemented in full.

We also support the non-licensed Precautionary Method Statement for Otter and Water Vole in Section 5.3 R5 of the Preliminary Ecological Appraisal (Urban Edge Environmental Consulting, March 2026), comprising a 10m exclusion zone around the river. This needs to be secured by a condition of any consent and implemented in full.

We also note that the reptile surveys undertaken in April and June 2026 concluded that low populations of Grass Snake and Slow Worm are present on site (Reptile Survey Report (Environmental Assessment Services Ltd., June 2026)). Therefore, we support the implementation of a reptile mitigation strategy which includes the off-site translocation of reptiles (Reptile Survey Report (Environmental Assessment Services Ltd., June 2026)). We understand that a suitable receptor site has been identified within the blue line boundary immediately to the east of the proposed development site and that it has been assessed as having sufficient carrying capacity for the translocated reptile populations. This should be secured by a condition of any consent and implemented in full.

We also support the Precautionary Method Statement for mobile protected and Priority species (including Hedgehog, which is a Priority and threatened species) in Section 5.3 R6, R10 and R12 of the Preliminary Ecological Appraisal (Urban Edge Environmental Consulting, March 2026). This needs to be secured by a condition of any consent and implemented in full.

The finalised measures should be provided in a Construction and Environmental Management Plan - Biodiversity to be secured as a pre-commencement condition of any consent.

We support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Ecological Appraisal (Urban Edge Environmental Consulting, March 2026)) to avoid impacts from light disturbance. This should be secured by a condition of any consent and implemented in full. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely to be present within the local area. This should summarise the following measures recommended by [Guidance Note:08/23 \(Institute of Lighting Professionals\)](#) will be implemented:

- Do not provide excessive lighting. Light levels should be as low as possible as required to fulfil the lighting need.
- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used.
- Warm White lights should be used at <2700k. This is necessary as lighting which emits an ultraviolet component or that has a blue spectral content has a high attraction effect on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- Where appropriate, external security lighting should be set on motion-sensors and set to as short a possible a timer as the risk assessment will allow.
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.
- Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and so should not be relied upon solely.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Preliminary Ecological Appraisal (Urban Edge Environmental Consulting, March 2026) and Reptile Survey Report (Environmental Assessment Services Ltd., June 2026) to secure net gains for biodiversity, as outlined under Paragraph 187d and 193d of the National Planning Policy Framework (December 2024). Reasonable biodiversity enhancement measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Enhancement Strategy to be secured as 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 support a lawful decision and overcome our holding objection.

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
 Email: PlaceServicesEcology@essex.gov.uk



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.

