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Our ref: 14575  
Date: 7 May 2026

By email only: Planning Department, [planninginfo@midsussex.gov.uk](mailto:planninginfo@midsussex.gov.uk)

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*Thank you for requesting advice on this discharge of condition 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.*

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**Application:** DM/26/0305  
**Location:** Greenacres Farm Wineham Lane Bolney Haywards Heath  
**Proposal:** Discharge of Biodiversity Net Gain condition 1 relating to planning application DM/25/2721

Thank you for re-consulting Place Services on the above discharge of condition for the Biodiversity Gain Condition

### **Biodiversity Gain Condition**

Biodiversity Net Gain 1.

This permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun (which includes demolition) because none of the statutory exemptions or transitional arrangements are considered to apply. Please see the information contained within the notes to applicants/agents set out below.

### **Comments**

We have reviewed the submitted documents for this application. This includes the following:

- Biodiversity Gain Plan Form
- Biodiversity Net Gain Assessment (CT Ecology Ltd, October 2025)
- Statutory Biodiversity Metric – Calculation Tool
- Biodiversity Enhancement Strategy (CT Ecology Ltd, January 2026)

- Preliminary Ecological Appraisal (CT Ecology Ltd, October 2025)
- Ecologist responding to Place Services response (26<sup>th</sup> March 2026)

It is reiterated 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'.

We have reviewed the applicant's ecologist response, which has been provided to address the comments in our response issued on 19<sup>th</sup> March 2026. As a result, we have the following recommendations for this application:

- We note that that proposals will consist of 52 trees (spaced approximately 4m apart), with 37 smaller species planted to form a secondary row (planted approximately 6m from the main tree line the field and these will be widely spaced to form more scattered trees within the grassland). If this is the case the Statutory Biodiversity Metric – Calculation Tool / Biodiversity Gain Plan Form will need to be updated, as the metric currently proposes that 117 trees will be planted.
- Further justification has been provided to give certainty that the habitat proposals will not result in woodland and scrub, due the proposed 4-5m spacing of the trees and controlling the habitat via horse grazing / on-going management. It is highlighted that proposed tree spacing is only 1-2m metres more than the standard woodland planting spacing. Nevertheless, as there is no clear guidance on the definition of individual trees, we are willing to accept the proposal habitat in principle. However, we do not consider sufficient information has been provided that 'Other neutral grassland' in moderate condition is feasible, as even with 4-5m tree spacing the grassland will likely be significantly shaded from the proposed matured trees, even on the northern boundary. Therefore, it is considered unlikely that grassland will contain the forb indicator species characteristic of the habitat type (in line with UK Habitats Classification v2), which is required to achieve moderate condition. As a result, it is advised that any grassland in the area for the proposed tree planting must be recorded as Other neutral grassland in poor condition.
- The strategic opportunity layers set out in the [West Suffolk LNRS Map](#) must be followed for strategic significance. Therefore, as the site is not located in an area which could become important for biodiversity, all strategic significance values must be recorded as 'low strategic significance'.

As a result, an updated Statutory Biodiversity Metric – Calculation Tool and Biodiversity Gain Plan must be submitted for this application. This may also require updates to the proposed on-site enhancement strategy to achieve a 10% measurable biodiversity net gain on-site, in this instance an updated post-development habitat map may also be required.

As this application is a minor development, it is reiterated that a HMMP and legal agreement will not be required as part of the Biodiversity Gain Condition, as the LPA does not consider minor development to include significant on-site enhancements. Therefore, a formal monitoring requirement of the proposed habitats will not be required for 30 years from the completion of development. Nevertheless, the proposals must still be realistic and deliverable to ensure that a measurable biodiversity net gain can be achieved in principle.

### **Recommendation**

We are unable to recommend the discharge of the Biodiversity Gain Condition until the additional information outlined above has been provided.

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.*