



Date: 25 September 2025

Our ref: 06912

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

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. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DM/24/2874
Location: Twineham Court Farm Bob Lane Twineham Haywards Heath
Proposal: Proposed removal of the modern disused and redundant agricultural buildings and creation of an events venue through the erection of an events barn and open barn. Proposed use of redundant Grade II Listed farmhouse and Curtilage Listed Building to provide ancillary accommodation to serve the events venue. Proposed erection of estate barn to assist with operation of events venue and retained agricultural land. Creation of new vehicular access onto Bob Lane and provision of driveway and parking area, plus ancillary infrastructure including surface and foul water drainage strategy. Provision of ecological enhancements and hard and soft landscaping.

Thank you for re-consulting Place Services on the above full application.

No ecological objection	<input type="checkbox"/>
Recommend approval subject to attached conditions	<input type="checkbox"/>
Further information required/Temporary holding objection on Mandatory Biodiversity Net Gains	<input checked="" type="checkbox"/>
Recommend Refusal	<input type="checkbox"/>

Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	<input type="checkbox"/>
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Summary

We have reviewed the Updated Ecological Walkover note (CT Ecology, May 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 are satisfied that there is sufficient ecological information available for determination of this application. However, 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 BNG metric, baseline habitat map and condition assessments and are not satisfied that appropriate information has been provided prior to determination. This is because of the reasons set out below:

- The habitat areas shown in the baseline habitat map are not represented in the BNG metric. The ratio of 'Modified grassland' to 'Artificial unvegetated, unsealed surface' is close to 1:1 in the metric, but this is very clearly not accurate to the baseline habitat map.
- The pond is shown to be outside of the red-line boundary but is included in the on-site habitat baseline. If this habitat is to be included in the baseline, it should be classified as an off-site habitat.
- Some habitat is classified as 'Scattered trees' in the baseline habitat map, but all trees are classified as 'Individual trees - Rural trees' in the metric. The number and locations of trees in each 'Scattered trees' patch should be clarified.
- 11 Individual trees are located within the red-line boundary. However, 40 trees (moderate condition; 11 medium, 29 small) are included in the on-site habitat baseline. Off-site trees should be classified as off-site habitat.

Where mandatory biodiversity net gains applies, 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, as well as the following information:

- a) The completed metric calculation tool showing the calculations of the pre-development and post-intervention biodiversity values.
- b) Pre and post development habitat plans.
- c) Legal agreement(s)
- d) Biodiversity Gain Site Register reference numbers (if using off-site units).
- e) Proof of purchase (if buying statutory biodiversity credits at a last resort).

Additional information – Great Crested Newt:

Please note 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.

Hallie Rees MSci (Hons)

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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.