



Date: 3 August 2026
Our ref: 12506

Rachel Richardson
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/25/3155
Location: The Havens Sportsfield Car Park The Haven Centre Hophurst Lane
Crawley Down
Proposal: New/Replacement Village Hall. Further information received regarding
flood risk and drainage (12/06/2026 and 01/07/2026) and ecology
(01/07/2026)).

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: • European Protected Species (bats)	☒
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, June 2026) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures.

We have also reviewed the information submitted relating to mandatory biodiversity net gains, including the Biodiversity Net Gain Assessment (JWK Wildlife Surveys, November 2025), Figure 1 The Village Hall Baseline Habitats (JWK Wildlife Surveys, November 2025), Figure 2 The Village Hall Post-Intervention Habitats (JWK Wildlife Surveys, November 2025), Biodiversity Condition Assessments and Statutory Biodiversity Metric (November 2025).

We are still not satisfied that there is sufficient ecological information available for determination of this application and recommend that further information with regard to bats is provided prior to determination. The reasons for this are outlined below:

European Protected Species (bats):

We understand from the Arboricultural Impact Assessment Survey SFF Tree Consultancy, submitted December 2025) that tree T2 (Hornbeam) will be removed to facilitate the development, as stated in our response dated 15th January 2026 and indicated in the Arboricultural Impact Assessment Survey SFF Tree Consultancy, submitted December 2025).

Unfortunately, the Ground Level Tree Assessment (JWK Wildlife Surveys, June 2026) only assessed Trees T7, T8, T9 and T10. Therefore, Tree T2 needs to be subject to a Ground Level Tree Assessment (GLTA) for Potential Roost Features (PRFs) for bats. We highlight that for any trees with PRFs for individual bats (PRFs-I) appropriate compensation would be required in advance of works to avoid loss of roost resource (Reason and Wray (2023) UK Bat Mitigation Guidelines. We further highlight that a non-licensed Precautionary Working Method Statement for bats would be required for trees with PRF-Is, 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). Further assessment would be required for any trees with PRFs for multiple bats (PRFs-M).

To fully assess the impacts of the proposal the LPA needs further information on bats, which are European Protected Species. This information is required prior to determination in accordance with Government Standing Advice which indicates that you should *“Survey for bats if the area includes buildings or other structures that bats tend to use or there are trees with features that bats tend to use nearby”*.

The results of these surveys are required prior to determination because paragraph 99 of the ODPM Circular 06/2005 highlights that: *“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.”*

This information is therefore required to provide the LPA with certainty of likely impacts on legally protected species and be able to secure appropriate mitigation either by a mitigation licence from Natural England or a condition of any consent. This will enable the LPA to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006 (as amended) and prevent wildlife crime under s17 Crime and Disorder Act 1998.

Additional Comments - Protected Species:

We note from the Ground Level Tree Assessment (JWK Wildlife Surveys, June 2026) that Trees T7 (Beech), T8 (Beech), T9 (English Oak) and T10 (Hornbeam) all have negligible bat roost potential. Therefore, we agree that no further surveys are required for these trees. As the current village hall lies adjacent to the site and will not be impacted by the works (Location Plan – Drg No. 2116-09 (Les Humphrey Associates, June 2021) and Design and Access Statement (Les Humphrey Associates, submitted December 2025)), we consider that no surveys for bats are required for this building.

We also recommend that a Wildlife Friendly Lighting Strategy is implemented for this application 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 recommend that reasonable biodiversity enhancements for protected, Priority and threatened species should be identified by a suitably qualified ecologist and implemented 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 need to be outlined within a separate Biodiversity Enhancement Strategy and secured by a condition of any consent.

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](#).

Additional comments - 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, it is highlighted that we support the submitted Biodiversity Net Gain Assessment (JWK Wildlife Surveys, November 2025), Figure 1 The Village Hall Baseline Habitats (JWK Wildlife Surveys, November 2025), Figure 2 The Village Hall Post-Intervention Habitats (JWK Wildlife Surveys, November 2025), Biodiversity Condition Assessments and Statutory Biodiversity Metric (November 2025). With regard to mandatory biodiversity net gains, it is highlighted that we support the submitted Biodiversity Net Gain Assessment (JWK Wildlife Surveys, November 2025), Figure 1 The Village Hall Baseline Habitats (JWK Wildlife Surveys, November 2025), Figure 2 The Village Hall Post-

Intervention Habitats (JWK Wildlife Surveys, November 2025), Biodiversity Condition Assessments and Statutory Biodiversity Metric (November 2025).

As 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](#).

It is indicated that Mid Sussex are taking the approach that minor developments do not contain significant on-site enhancements and are not required to be monitored for a period of 30 years from the completion of development via a Habitat Management and Monitoring Plan (HMMP). As a result, we are satisfied an HMMP will not be required for the Biodiversity Gain Plan.

We are generally satisfied that the post-intervention values are realistic and deliverable. However, it is recommended that the following matters will need to be considered by the applicant as part of the biodiversity gain condition:

- We welcome the intention of the applicant to purchase offsite units to achieve a 10% gain in biodiversity. We highlight that the Biodiversity Gain Site Register reference

numbers will be required (if buying off-site units) and Proof of purchase (if buying statutory biodiversity credits) should be submitted with the Biodiversity Gain Plan.

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)
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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.

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.

AI may have been used in the preparation of this response, but its 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.

