



11th March 2025

Andrew Horrell
Mid Sussex District Council
Oaklands Road
Haywards Heath
RH16 1SS

By email only

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/24/2646
Location: Down Park Place Turners Hill Road Crawley Down Crawley West Sussex RH10 4HQ
Proposal: Erection of replacement ancillary domestic building comprising garage, garden store and gym. (amended tree protection plan 12/12 BNG info received 07/02).

Dear Andrew

Thank you for consulting Place Services on the above application.

Recommended Temporary Holding Objection pending further information on European Protected Species (bats)	Yes
No ecological objections	
Recommended Approval subject to attached conditions	
Recommended Discharge of condition	

Summary

We have reviewed the documents supplied by the applicant, but unfortunately there is an absence of ecological information included with the application to help assess the likely impacts of development on designated sites, protected & Priority species and habitats and identification of appropriate mitigation measures. We highlight that the biodiversity net gain information provided relates to habitats and not to protected species.

In addition, we have reviewed the Biodiversity Net Gain (Ecological Ltd., February 2025) and Statutory Biodiversity Metric, relating to securing biodiversity net gains.



We are not satisfied that there is sufficient ecological information available for determination of this application and recommend that additional information for bats is required to make this proposal acceptable prior to determination. The reasons for this are outlined below:

European Protected Species – bats

We note from the Biodiversity Net Gain (Echological Ltd., February 2025) that a pre-existing outbuilding will be demolished. As bats may be present and affected by the development, a Preliminary Roost Assessment for bats should be undertaken in accordance with 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023) prior to determination in order to inform any mitigation requirements or the need for further surveys. In addition, any trees which may be impacted by the development should be subject to a Ground Level Tree Assessment for bats to check for potential roost features. There is a block of deciduous woodland to the north of the site, a strip of woodland to the west of the site ([MAGIC maps](#) and Location Plan (March 2023)) and it appears that the surrounding area is well wooded (Google maps), therefore bats may be using the site. Please note that these assessments can be undertaken at any time of year.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, which are European Protected Species. These surveys are required prior to determination because [Government Standing Advice](#) says you should ask for a survey if:

- distribution and historical records suggest bats may be present
- the development site includes buildings or other built structures or trees that provide roosting opportunities for bats

The results of these assessments for bats 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.

This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).

Additional Comments

As mobile protected species, including Hedgehog, which is a Priority and threatened species, may be present on the site, we recommend that a Precautionary Method Statement is implemented for this application. This should be secured by a condition of any consent.

With regard to mandatory biodiversity net gains, it is highlighted that we support the submitted Biodiversity Net Gain (Echological Ltd., February 2025) and Statutory Biodiversity Metric. Biodiversity net gain is a statutory requirement set out under [Schedule 7A \(Biodiversity Gain in England\) of the Town and](#)



[Country Planning Act 1990](#) and we are satisfied that submitted information provides sufficient information at application stage. As a result, a Biodiversity Gain Plan should be submitted prior to commencement, which also includes the following:

- 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).

In addition, a [Habitat Management and Monitoring Plan](#) (HMMP) should be secured for all [significant on-site enhancements](#). However, we note that the post-intervention values have been provided and that no significant on-site enhancements are proposed in the proposals. As a result, we are satisfied that HMMP is not likely to be required by legal obligation or a condition of any consent for a period of up to 30 years.

We also recommend that reasonable biodiversity enhancements for protected, Priority and threatened species should be identified 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 should be outlined within a separate Biodiversity Enhancement Strategy and should be 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](#).

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 with any queries.

Yours sincerely

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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.