



1st April 2025

Stefan Galyas
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/25/0482
Location: Burgess Hill Dental Care 75 Station Road Burgess Hill West Sussex RH15 9DY
Proposal: Proposed demolition of existing garage and construction of a 2-storey rear side extension and a 1-storey side extension

Dear Stefan

Thank you for consulting Place Services on the above application.

Recommended Temporary Holding Objection pending further information on European Protected Species (bats) and Biodiversity Net Gain	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 potential use of the site by bats. Please note that the biodiversity net gain information relates to habitats only and not to protected species.

In addition, we have reviewed the Pre-and Post Development Plans (submitted 24th February 2025), Biodiversity Gain Plan (February 2025) and Biodiversity Net Gain Statement (partially completed, submitted March 2025), relating to securing mandatory biodiversity net gains.

We are not satisfied that there is sufficient ecological information available for determination of this application and recommend that additional information on bats and mandatory biodiversity net gain is provided prior to determination. The reasons for this are outlined below:



European Protected Species - Bats

We note from the Planning Plus Design & Access Statement (February 2025) that the existing garage will be demolished, a 1 storey side extension and a 2 storey rear extension will be constructed and the side and rear of the building will be clad in timber. Therefore, as bats may be present and affected, it is necessary to undertake a Preliminary Roost Assessment for bats in accordance with [Government Standing Advice](#). The results of the assessment need to be submitted to the LPA prior to determination.

The results of the Preliminary Roost Assessment are required prior to determination because paragraph 99 of 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 required to provide the LPA with certainty of 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.

Mandatory Biodiversity Net Gain

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 Pre- and Post Development Plans (submitted 24th February 2025), Biodiversity Gain Plan (February 2025) and Biodiversity Net Gain Statement (partially completed, submitted March 2025) and are not satisfied that appropriate information has been provided prior to determination. This is because of the reasons set out below:

- The application is not supported by a Statutory Biodiversity Metric – Calculation Tool (Excel version) or accompanying condition assessment. This is required to ensure that the habitats within the pre-development baseline have been recorded appropriately.



Please note we do not provide 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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Ecological Consultant

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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.