

Application: DM/26/0366

Location: Land At Queen Victoria Hospital Hackenden Lane East Grinstead, West Sussex

Proposal: Discharge of planning conditions nos 7, 8, 10 and 12 relating to planning application DM/24/2704

Dear Stefan Galyas

I am writing to address comments raised in a consultation response by Place Services dated 10th March 2026.

The Place Services consultation comments are set out below, with our response below each point.

Condition 7

We are not satisfied that the submitted information includes the detail required by this condition.

Firstly, it is indicated that the HMMP needs to be discharged concurrently with the statutory Biodiversity Gain Condition. This is a statutory pre-commencement condition which applies to all applications where mandatory BNG applies. 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'.

Therefore, in summary, the submission of a Biodiversity Gain Plan will consist of the following information:

- *A Biodiversity Gain Plan form (Ideally using the Government's template: <https://www.gov.uk/government/publications/biodiversity-gain-plan>)*
- *The completed biodiversity metric - calculation tool (& condition assessment if using Statutory Biodiversity Metric – Calculation Tool)*
- *Completed pre-development and post-development habitat maps*

- *A Habitat management and monitoring plan (for significant on-site enhancements or off-site measures in land owned by the applicant)*
- *Legal agreement for monitoring and management of significant on-site enhancements or off-site measures in land owned by the applicant (if required by the LPA).*

If off-site biodiversity units are proposed, then evidence of registration / allocation onto the biodiversity gain site register will be required (if using blue line boundary land or a separate off-site provider). If Statutory Biodiversity Credits from the Government are proposed, then proof of purchase will be required.

In addition, we recommend that the following additional information is included in the submitted HMMPs:

- *Habitat Creation, Enhancement and Management – Risk Register and Remedial Measures. It is recommended that a Site-wide risk register associated with establishing and managing each habitat type is included as part of HMMP 2.*
- *The monitoring strategy should clearly reflect the condition requirements of the submission of monitoring reports at years 1, 2, 5, 10, 15, 20, 25, and 30 within the schedule of works.*
- *The monitoring strategy should set out how the monitoring will be undertaken by the suitably qualified ecologist.*

Response: A Biodiversity Gains Plan form (Government template) has been completed. A Risk Register and Remedial measures have been included within HMMP part 2. The monitoring strategy includes the monitoring years of 1, 2, 5, 10, 15, 20, 25, and 30. Appendices have been updated to include high quality examples.

Condition 8

We are not satisfied that the submitted information includes the detail required by this condition.

This is because the definition of the plans in Appendix 5 Soft Landscape Proposal Whole Sheet, Appendix 6 Sheet 1 Soft Landscape Proposal, Appendix 7 Sheet 2 Soft Landscape Proposal Sheet 2 and Appendix 8 Sheet 3 Soft Landscape Proposal in the

Construction Environmental Management Plan: Biodiversity (ACD Environmental, January 2026) is poor and cannot be read in detail.

Response: High quality appendices have been included.

Condition 10

We are not satisfied that the submitted information includes the detail required by this condition.

We note that the details of the Schwegler 1FF bat box, Schwegler 2F bat box, Schwegler 1SP Sparrow box, Vivara Pro Seville Bird box and Vivara Pro Barcelon bird box are shown in Sections 6.30 to 6.33 Habitat Management and Species Mitigation of the Habitat Management and Monitoring Plan (HMMP) Part 1.

However, the details of the bee bricks, insect hotel and Hedgehog highway holes have not been included, although the locations are indicated in Appendix 5 Ecological Enhancement Plan.

Unfortunately, the definition of the plan in Appendix 5 Ecological Enhancement Plan in the Habitat Management and Monitoring Plan (HMMP) Part 1 showing the locations of the enhancements is poor and cannot be read in detail.

Response: High quality appendices have been included and details relating to bee bricks, hedgehog highways are now included and have been added to HMMP part 1.

I trust that the above information is satisfactory, but please contact me if you have any questions.

Yours sincerely

Jake Cranston – Ecologist for and on behalf of ACD Environmental Ltd.