



Date: 6 October 2026

Our ref: 22564

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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/26/2114
Location: Selsfield Place Selsfield Common West Hoathly East Grinstead
Proposal: Variation of Condition No: 4 and condition No 8 relating to DM/15/1365 - to enable the substitution of plans as listed in the design and access statement.

Thank you for consulting Place Services on the above S73 Variation of Condition 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 Site Review and Update Roost Appraisal (The Ecology Partnership, August 2026) and note that a survey for roosting bats was undertaken in May 2026, following previous surveys for roosting bats in December 2014, May 2015, September 2015, May 2018, August 2019 and July 2022.

We understand that Condition 4 relates to the recommended mitigation, compensation and enhancement measures in respect of bats and barn owls as set out in the barn owl survey report by Environmental Assessment Services Ltd, dated September 2015, the bat survey report (2) by Bat Box Ltd, dated 6 September 2015 and shown on drawing title: Selsfield Place Farm Buildings - Outbuilding as Proposed (ref: A1.12, dated 23.11.15).

We note from the Site Review and Update Roost Appraisal (The Ecology Partnership, August 2026) that a updated licence for bats will be required before commencement of any works and recommend that a copy of this is secured by a condition of any consent. This is because the surveys in May 2026 confirmed a new Brown Long-eared bat roost in Building B (brick-built section of the barn) and a Brown Long-eared bat roost in Building E (most northern structure used to store agricultural machinery). We understand that three additional surveys for bats will be undertaken between May and September to inform the updated licence and mitigation requirements. We highlight that the outline mitigation measures to support the bat licence application should also be provided to the LPA.

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.

Furthermore, the Local Planning Authority, as a competent authority, should have regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) when reaching planning decisions and must not leave this until the licence application stage. Therefore, if a European Protected Species Mitigation Licence is required for this application, appropriate mitigation measures to support the provision of the licence must also be outlined prior to determination to allow certainty to the LPA that a licence will likely be granted.

We also understand that Building A (brick-built structure with a tiled roof), Building C (small, enclosed section) and Building D (adjacent to Building C) all had no evidence of roosting bats. Therefore, we agree that no further surveys are required for these buildings.

We support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Site Review and Update Roost Appraisal (The Ecology Partnership, August 2026)) to avoid impacts from light disturbance. This should be secured by a separate condition of any consent as part of the s.73 application. 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 understand from the Site Review and Update Roost Appraisal (The Ecology Partnership, August 2026) that a single Barn owl pellet was identified in September 2015 in Building A, the westernmost barn, which has subsequently been converted and a Barn owl box was suitably erected in mitigation. We therefore agree that no further action is required with regard to Barn owl.

Recommendation

We support the Site Review and Update Roost Appraisal (The Ecology Partnership, August 2026), but we are unable to support variation of Condition 4 until the outline measures to support the updated mitigation licence for bats has been submitted to the LPA. We have no comments to make on the variation of Condition 8 and would recommend a separate wildlife sensitive lighting strategy condition is secured as part of this application.

Please do not hesitate to contact us if you have any queries in relation to this advice.

Yours sincerely,

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Place Services at Essex County Council



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.

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