



Date: 8 May 2025

Our ref: 03563

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

By email only: Planning Department, 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. 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/25/0888
Location: The Holt Stonehurst Selsfield Road Ardingly
Proposal: Structural repair works to existing roof structure, re-roofing, installation of three roof lights and general refurbishment works to plotting shed

Thank you for consulting Place Services on the above householder application.

No ecological objection	☐
Recommend approval subject to attached conditions	☐
Further information required/Temporary holding objection • 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 documents supplied by the applicant, relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation. This includes The Bat Scoping Assessment (Ecology Co-op, January 2025).

We are not satisfied that there is sufficient ecological information available for determination of this application due to insufficient information on European Protected Species (bats). The reasons for this are outlined below:

European Protected Species:

We note that the Bat Scoping Assessment (Ecology Co-op, January 2025) confirms that the structure contains low roosting suitability for bats and recommends a precautionary approach based on professional judgement in line with BCT Guidelines¹. We support the proposals to undertake a precautionary approach without the provision of a Emergence or Re-entry Survey but recommend that an outline mitigation strategy should be set out prior to determination to ensure the LPA has certainty that potential impacts upon European Protected Species will be appropriately addressed.

This should include timing of works, when licenced ecologists should be present within the site, the precautionary works (e.g. soft stripping) and what should be undertaken in the event that bats are determined during the works. This could be included in an updated Bat Scoping Assessment (Ecology Co-op, January 2025) or separate report.

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:

With regard to mandatory biodiversity net gains, it is highlighted that 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. As a result, we are satisfied that this application is exempt from mandatory biodiversity net gains, as the development meets the householder exemption.

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)
Senior Ecological Consultant
Place Services at Essex County Council

¹ Collins, J. (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines. 4th edition. Bat Conservation Trust, London.

Email: PlaceServicesEcology@essex.gov.uk



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.

