

Bat Survey Report

The Brook
Crawley Down
September 2025 (v01)

Project details		
Site	The Brook, Cuttinglye Road, Crawley Down, West Sussex, RH10 4LR	
Client	Mr & Mrs Roff	
Survey type & date	Emergence surveys: 19 th August 2024 9 th September 2024 21 st August 2025	
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The contents of this report have been produced with due consideration of current best practice guidance, and in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct.

Data within this report is valid for a maximum of 18 months from the date of the survey. After this period, an updated site visit will be required to determine a new ecological baseline. More up-to-date survey data may be required for a planning application or licensing, depending on conditions and impacts.

Whilst every effort has been taken to ensure the accuracy of this report and its contents, in view of potential ecological constraints to development or the likely presence or absence of species, it must only be viewed as a snap-shot in time and, therefore, not be viewed as definitive. Due to external factors, such as seasonality, weather etc, having the potential to affect survey results, no liability can be assumed for omissions or changes that may, or may not occur, after the date this report was produced.

EXECUTIVE SUMMARY

SITE	A detached property including detached outbuildings set within a large wooded plot.
PROPOSAL	It is proposed for the detached house to be demolished and a replacement detached house to be constructed.
HISTORIC SURVEYS & KEY FINDINGS	- Preliminary Ecological Appraisal (PEA) which included a Preliminary Roost Assessment (PRA) in July 2024 and an update in August 2025 by Deepdene Ecology. - No signs of bats were observed during the survey. - The PRA found that the main house (B1) had a small number of external features that could support roosting bats. It was assessed as having low suitability for bats, and at least one emergence survey was recommended. - No other buildings on Site will be impacted by the proposals and therefore, no additional surveys were recommended.
SURVEYS COMPLETED	- Two emergence surveys of the main house by two surveyors with infrared video cameras were undertaken in 2024. These surveys covered the few potential roosting features noted during the PRA. - An update emergence survey was undertaken in August 2025 to support this planning application and the subsequent licence application that will be required.
KEY FINDINGS	- There were no constraints or limitations to the surveys which were undertaken by experienced bat surveyors. - Soprano pipistrelles were recorded emerging from two day roosts located beneath the hanging tiles on the rear (southern elevation) and eastern elevation of the property. A maximum of four individuals were recorded emerging from the southern elevation roost, and a single individual was recorded from the eastern elevation roost. - A day roost for one common pipistrelle was also recorded under hanging tiles on the eastern elevation. - Low levels of commuting activity by common pipistrelle, soprano pipistrelle, serotine, <i>Myotis spp.</i>, brown long-eared and noctule bats were detected during the survey. - The proposals will result in the loss of the three roosts and therefore, in order for the works to legally proceed, it will be necessary to obtain a mitigation licence in advance of works, from Natural England. - The roosts detected are of low conservation value and therefore it will be possible to use the Bat Mitigation Class Licence (BMCL) approach. This is a more streamlined licensing approach.

	• Mitigation will be required in support of the licence and is likely to include a pre-works check, a supervised soft strip, a toolbox talk to contractors and the inclusion of bat access/roosting opportunities at the Site. • Enhancements have been suggested to increase the value of the Site for biodiversity.
OVERALL FINDING	• The property was found to support two day roosts of soprano pipistrelle bats and a day roost for common pipistrelles. These three roosts will be lost as a result of the proposals. • It will be necessary to obtain a Mitigation Licence in advance of works and once planning permission is granted to allow the works to lawfully proceed. • Mitigation has been recommended to minimise potential disruption/disturbance to roosting, foraging and commuting bats. This will ensure that the favourable conservation status of bats using the Site would be maintained and that there will be no harm to individual bats. • Enhancement measures have been recommended that would result in a net improvement in opportunities for bats at the Site.

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1 INTRODUCTION

1.1 Background

Deepdene Ecology Ltd was instructed by Mr and Mrs Roff to undertake an emergence survey at ‘The Brook, Cuttinglye Road, Crawley Down, West Sussex RH10 4LR’ (hereafter referred to as the ‘Site’). A planning application will be submitted for the demolition of the existing residential house and the construction of a new detached residential property on a smaller footprint than is currently present.

A Preliminary Bat Roost Assessment (PRA) was undertaken as part of a Preliminary Ecological Appraisal (PEA) in July 2024 by Deepdene Ecology (2025)¹. The survey assessed the buildings on Site, and the main house (B1) was found to support some external features including gaps under hanging tiles on part of the rear and the eastern side elevation. Overall, the building was assessed as having low suitability to support roosting bats and at least one follow-up emergence survey was therefore recommended.

An emergence survey was undertaken in August 2024 and a soprano pipistrelle roost was recorded on the rear of the property and as a result, a second survey was undertaken to help characterise the roost.

Due to the time elapsed since the 2024 surveys, an update emergence survey was undertaken in August 2025 to provide current information to inform this planning application and, subject to planning permission being granted, to support the subsequent bat licence application.

The other buildings within the Site, as well as the other sections of B1, including the annex, were all found to have negligible suitability for roosting bats and as such, no additional bat surveys were recommended.

The results of all three emergence surveys from 2024 and 2025 are provided in this report, and the PEA report (Deepdene Ecology, 2025) should be read alongside it.

1.2 The Site

The Site (TQ 35127 38651) comprised a main dwelling (B1) and associated outbuildings, situated within a large wooded garden plot on the northern edge of Crawley Down (see **Figure 1**). The immediate setting is semi-rural, characterised by large residential properties within a low-density settlement pattern. The wider landscape supports a mosaic of habitats including woodland blocks, arable fields, pasture, mature trees, and hedgerows. Woodland is present both within the Site and in the surrounding area, providing ecological connectivity. These habitats collectively offer suitable foraging and commuting opportunities for bats and other wildlife.

Of the buildings to be subject to change as part of the application, the main house (B1) was assessed as having low suitability for roosting bats due to external features such as missing gaps under hanging tiles on the rear and eastern elevations. All the other buildings present on Site

¹ Deepdene Ecology Ltd, (2025). *Preliminary Ecological Appraisal – The Brook, Crawley Down*. Issued September 2025

were found to have negligible suitability to support roosting bats and no bat emergence surveys were therefore recommended.



Figure 1: Aerial photograph of the Site (indicative only). Image taken from Google Earth.

1.3 Proposed Development

A planning application will be submitted for the demolition of the existing main house and the construction of a new residential property, on a similar albeit smaller footprint.

A full set of drawings will be provided with the planning application with the existing and proposed site plan provided in **Appendix B**.

1.4 Scope of the Assessment

This report presents the results of emergence surveys undertaken in August and September 2024 and August 2025. The aim of the surveys was to determine if roosting bats are using the main house (B1) and outline the mitigation, enhancement and licensing (if necessary) that would be required to ensure that the proposed development could proceed without contravening wildlife legislation.

1.5 Summary of relevant legislation

In the UK, all bats and their roosts are legally protected through Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and the Wildlife and Countryside Act (1981) as amended. Taken together, this makes it an offence to:

- Deliberately take, injure or kill a bat.
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats.
- Damage or destroy a place used by bats for breeding or resting (roosts) (even if bats are not occupying the roost at the time).
- Intentionally or recklessly obstruct access to a bat roost.

Further details on the legislation and relevant policy can be found in **Appendix A**.

2 METHODOLOGY

2.1 Emergence Survey

In order to determine the location, extent and type of any roosts (if present), a dusk emergence survey was undertaken on the 19th August 2024, following best practice survey guidelines (Collins, 2023). As a bat roost was identified on the rear of the property, a second survey was undertaken on the 9th September 2024. Given the time elapsed before the planning application submission, as a precaution, an update survey was undertaken on the 21st August 2025.

Two surveyors were positioned to cover the potential roosting features that had been identified on B1 during the PRA (see **Appendix C** for surveyor locations & view). The surveyors had full visibility of all potential roosting features and there were no constraints to their view.

The surveyors were equipped with a handheld bat detector (Echo Meter Pro 2) which recorded bat activity at the Site. The activity was categorised where possible as emergence, commuting or foraging behaviour with the bat calls logged and recorded for later confirmation of species, where necessary.

A Canon XA20 video recorder with the assistance of infrared lighting was used in conjunction with each surveyor. The recordings were viewed after the surveys were completed, to help ascertain if any bats had emerged from the building.

The surveys were undertaken in suitable weather conditions (see **Table 1**) and began 15 minutes before sunset and continued for just over an hour and a half after sunset. This is considered to be the optimum time for bats to emerge from a roost.

2.2 Surveyor information

The survey and assessment were led by Nadine Clark (Bat Class Licence holder, registration number 2015-14593-CLS-CLS). Nadine is a full member of the Chartered Institute of Ecology

and Environmental Management (CIEEM) and has over 18 years' experience of undertaking ecological surveys. The additional bat surveyors were Anne Bruce MSc, Dr Mike Bright and Shaun Pryor BSc, who are all experienced bat surveyors.

2.3 Limitations

It should be noted that bats can use roosting features intermittently during the year and may be present in larger or smaller numbers depending on their breeding cycle, weather conditions, and in response to disturbance. Bats may be present at other times and the results should therefore be viewed with caution.

The survey visits were undertaken in accordance with best practice guidelines, during weather conditions that were considered suitable. Nevertheless, the results of the ecological surveys allow evaluation of potential constraints and the potential for negative impacts from the proposed works on roosting bats.

3 RESULTS

3.1 Emergence survey

Three emergence surveys of B1 were undertaken and **Table 1** below details the timings and weather conditions during the survey.

Table 1: Emergence survey details

Date	Sunset	Survey timing	Weather conditions
19 th August 2025	Sunset: 20:13	Start time: 19:58 Finish time: 21:43	Temperature: 21/17°C Cloud: 8/8 Wind (Beaufort Scale): 1-2 Precipitation (0-4): 0 Humidity: 63/76%
9 th September 2025	Sunset: 19:27	Start time: 19:12 Finish time: 20:57	Temperature: 16/12.5°C Cloud: 1/8 Wind (Beaufort Scale): 1 Precipitation (0-4): 0 Humidity: 60/78%
21 st August 2025	Sunset: 20:09	Start time: 19:54 Finish time: 21:39	Temperature: 18/13.5°C Cloud: 4/8 Wind (Beaufort Scale): 1 Precipitation (0-4): 0 Humidity: 60/86%

The following section summarises the bat activity from the survey visits and any key activity seen by the surveyors is shown in the figure in **Appendix C**.

3.1.1 19th August 2024

Emergences

A single soprano pipistrelle *Pipistrellus pygmaeus* was recorded emerging from under hanging tiles on the rear of the property at 20:05. The access point location under the hanging tiles is provided in Photograph 1, **Table 2**.

Activity

The first bat recorded was the soprano pipistrelle recorded emerging from under the hanging tiles. Soprano pipistrelle was recorded foraging and commuting around the Site intermittently throughout the survey.

A common pipistrelle *P. pipistrellus* was heard by both surveyors at 20:14 but not seen. Common pipistrelle were then heard foraging intermittently throughout the survey and seen foraging close to the building at 21:20 and 21:29.

A serotine *Eptesicus serotinus* was heard and seen by surveyors flying to the north of the building (B1) at 20:37.

A noctule *Nyctalus noctula* was heard infrequently by both surveyors from 20:32 but not seen.

A brown long-eared bat *Plecotus auritus* was recorded by surveyor 1 at 21:09 and at 21:39 by surveyor 2 but not seen.

No other species were detected during the survey. A low level of bat activity was recorded during the survey, with the majority of the activity by single common and soprano pipistrelles.

3.1.2 9th September 2024

Emergences

Four soprano pipistrelles were recorded emerging from the rear hanging tiles (Photograph 1, **Table 2**) at 19:19, 19:27, 19:31 and 19:40.

A single common pipistrelle was recorded re-entering the hanging tiles near the door at 20:34 and emerged at 20:42. A common pipistrelle was then seen re-entering at 20:51 and did not emerge again during the survey.

Activity

The first bats recorded were two noctules *Nyctalus noctula* seen and heard at 21:29 flying at height over the garden. Noctules were not seen or heard again during the survey.

A common pipistrelle was heard but not seen at 21:30 and infrequent foraging was seen and heard around the garden throughout the survey until 22:26.

A soprano pipistrelle was heard at 22:09 but not seen by the surveyor.

A likely Leisler's *Nyctalus leisleri* call was briefly heard at 22:21 but not seen.

No other species were detected during the survey. A low level of bat activity was recorded during the survey, with the majority of the activity by a single common pipistrelle.

3.1.3 21st August 2025

Emergences

A soprano pipistrelle was observed emerging from under the hanging tiles at 20:02, 20:14 and 20:19 at the rear of the property (Photograph 1, **Table 2**).

A soprano pipistrelle was recorded emerging from the side of the property from under hanging tiles at 20:11, near the apex of the hanging tiles (Photograph 2, **Table 2**).

No other emergences were recorded. This was also confirmed by later analysis of the video footage.

Activity

The first bat recorded was the soprano pipistrelle recorded emerging from the rear hanging tiles at 20:02. Soprano pipistrelle were then recorded foraging in the garden intermittently during the survey.

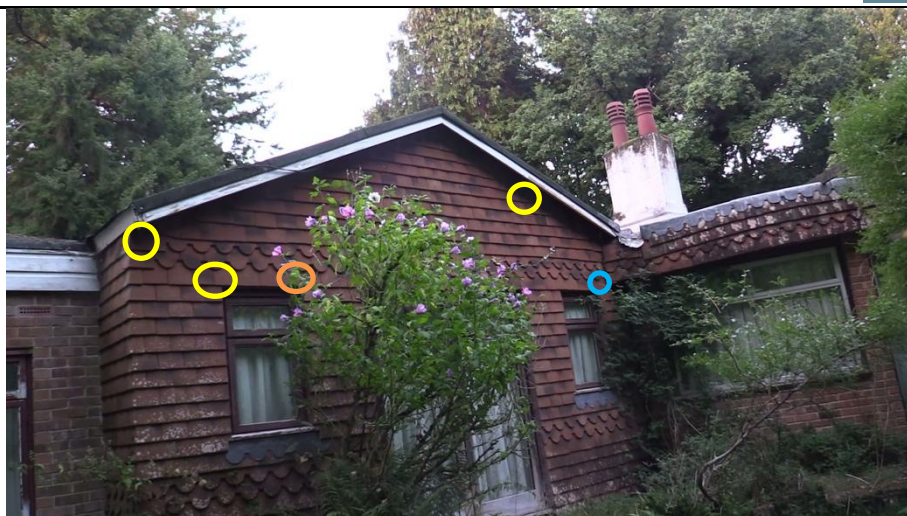
A common pipistrelle was heard and seen flying over the property at 20:19 by both surveyors and infrequent foraging was seen and heard around the garden throughout the survey.

A serotine was seen commuting past the north of the building by both surveyors at 20:38 and seen foraging to the north at 20:42. A brief call was also heard by surveyor 1 at 21:19.

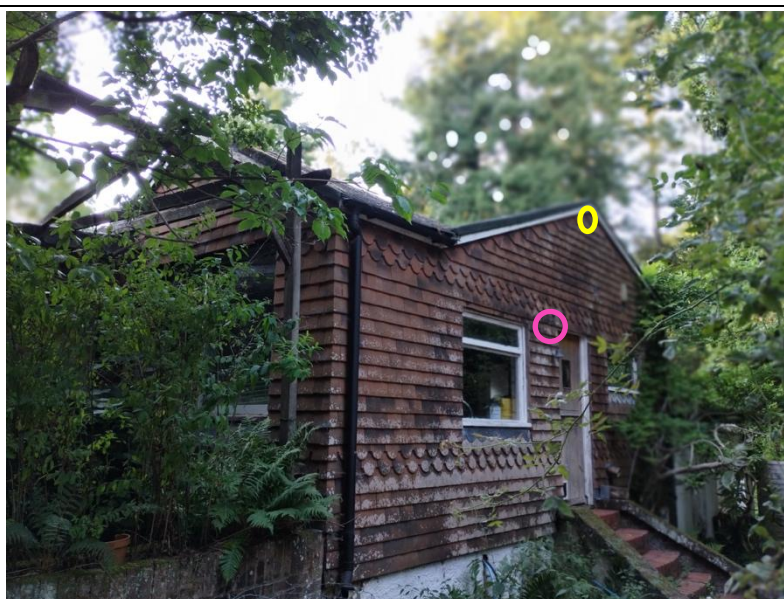
A *Myotis sp.* was heard foraging nearby by surveyor 2 at 20:40, 20:47 and 21:17 and by surveyor 1 at 21:20.

No other species were detected during the survey. A low level of bat activity was recorded during the survey, with the majority of the activity by single pipistrelles.

Table 2: Bat emergence locations.



Photograph 1: Emergence point of soprano pipistrelles from the rear elevation in August and September 2024 (blue). Emergence location of single soprano pipistrelle in September 2024 and August 2025 (orange). Emergence location of single pipistrelles from each of the three access points in August 2025 (yellow).



Photograph 2: Location of re-entry and emergence by a common pipistrelle on the front elevation in September 2024 (pink). Location of single soprano pipistrelle seen emerging from hanging tiles near the apex of the gable (yellow) in August 2025.

4 ASSESSMENT

4.1 Discussion of findings

The surveys were completed following standard survey guidelines in suitable weather conditions by competent, experienced bat ecologists and there were no constraints to the surveys with good visibility of all potential roosting features and through the use of infra-red cameras to help facilitate the surveys.

The emergence surveys recorded:

- One day roost with multiple access points, used by a maximum of five soprano pipistrelles on the rear, southern elevation,
- One day roost for a single soprano pipistrelle on the eastern elevation
- One day roost for a single common pipistrelle on the eastern elevation.

All three of these roosts will be lost following demolition of the existing house (B1).

During the first survey and third emergence survey, activity was low to moderate with moderate/high activity during the second survey. The majority of the activity was by a small number of common pipistrelles using the gardens for foraging and commuting. Other species recorded included noctule, soprano pipistrelle, and *Myotis sp.* bats.

4.1.1 Conservation significance

Common pipistrelle bats are a widespread species with a stable range that extends across the UK and a population consisting of approximately 3 million individuals (Bat Conservation Trust, 2024). The roost identified is not used for breeding and is therefore not considered significant for the maintenance of the species at the local level. Therefore, the day roost is considered to be of Site level conservation significance (Reason & Wray, 2023).

Soprano pipistrelle bats are a widespread species of bat with a stable range that extends across Great Britain and a population consisting of approximately 4.7 million individuals (Bat Conservation Trust, 2023). The roosts identified are not used for breeding and are therefore not considered significant for the maintenance of the species at the local level. Therefore, the roosts are considered to be of Site level conservation significance (Reason & Wray, 2023³).

4.2 Potential impacts

The proposals will result in the loss of two soprano pipistrelle day roosts and a common pipistrelle day roost, beneath the hanging tiles on rear and eastern elevation.

In the absence of any mitigation, the proposed works could result in disturbance, harm or mortality of up to one common pipistrelle and five soprano pipistrelles, should they be present at the time of the works, along with the destruction of three low value roosts. Overall, the works have the potential to cause a low scale of impact at the Site level on common pipistrelle and soprano pipistrelles (Reason & Wray, 2023).

In addition, the grounds and immediate area are used by a small number of soprano and common pipistrelles, serotine, *Myotis sp.* and noctule and as such, construction disturbance impacts such as night-time working and lighting should be considered.

4.3 Legal status

All bats and their roosts are legally protected (see **Section 1.5 & Appendix A** for more information). In order for the works at the Site to legally proceed, it will be necessary to

obtain a mitigation licence in advance of the works and once planning permission has been obtained.

5 RECOMMENDATIONS

5.1 Bat Mitigation Class Licence

The surveys confirmed the presence of a day roost for common pipistrelle, supporting a single individual, and two day roosts for soprano pipistrelle. The soprano pipistrelle roosts were located beneath hanging tiles, with up to five bats recorded on the southern rear elevation and a single bat on the eastern side elevation.

These three roosts are classed as of 'Site' level value (Reason & Wray, 2023) and at the Site level, the loss of the three roosts, is also considered to be low. Therefore, it will be possible to use the Bat Mitigation Class Licence (BMCL) route.

The BMCL is a more streamlined licensing approach, under which, a Registered Ecological Consultant will hold the licence, and an application is made to Natural England to allow the Site to be registered on it. To allow the Site to be registered, appropriate mitigation and compensation considering the level of impact will need to be implemented.

Once the registration is confirmed, it will allow actions that would otherwise be unlawful, including disturbance of bats and the destruction of a roost, and the development can then proceed.

It is only possible to apply for Site registration once planning permission has been granted and Natural England have up to 10 working days to consider each application. It is necessary for a Site walkover to be undertaken within 3 months of an application to confirm that the conditions on Site have not changed since the surveys were undertaken.

5.1.1 Mitigation Strategy

As part of the licence registration, mitigation details will be provided to demonstrate that the favourable conservation status of bats will be maintained throughout the life of the project. The possible measures that would be required to safeguard bats and achieve this are outlined below:

- **Timing of the works** - There are no timing restrictions on the works. The Site supports day roosts of non-breeding individuals and therefore, avoiding the breeding period (May-August inclusive) is not considered necessary. As best practice, demolition and soft stripping when bats might be in torpor is not recommended due to the potential impact of disturbance.
- **Toolbox talk** - Prior to any works, a licensed bat ecologist would provide a toolbox talk to all contractors regarding bats and their legal protection.
- **Pre-works inspection, supervision and soft strip** - Prior to any works on Site, a pre-works inspection would be undertaken to ensure there are no bats present within

the building. If any bats were found, they would be captured by hand and placed into a bat box (see below). Once the inspection was complete, the initial works would begin using a soft strip method under the supervision of a licensed bat ecologist. The ecologist would ensure that the soft strip was carried out following an appropriate working approach.

- **Compensatory roost sites** - In advance of the works, in order to compensate for the loss of the roosts, a bat box suitable for crevice dwelling species, such as pipistrelles will be hung on a suitable mature tree or where none is available, fixed to a tall pole. The bat box will also be used in the unlikely event that bats are encountered during the works. The box used would be suitable to support the species recorded within the Site. In this case, a Kent Eco Box or Improved Crevice box for pipistrelles (see **Appendix D**).
- **Alternative roost sites** – In order to compensate for the loss of the roosts, new roosting opportunities under roof tiles should be incorporated into the design proposals (see **Appendix D**). These can be created through the use of a bat access tiles. This will provide roosting opportunities for the crevice roosting pipistrelles. Alternatively, an integrated bat box such as the Habibat 001 bat box or an Istock Enclosed Bat Box 'B' can be built into the walls. These integrated boxes can be faced with matching brick or rendered leaving only an access slit visible. These integrated bat boxes and access tiles do not require any maintenance and are self-cleaning and can provide an alternative roost.
- **Roof lining** - The more modern breathable roofing membranes (BRM) can be associated with changes to the microclimate within a void, along with entanglement or trapping of bats and can result in the death of bats that come into contact with it (Waring et al., 2013). Therefore, any new lining must use bitumen (1F) roofing felt or timber sarking. Alternatively, any roofing underlay that has passed the required snagging test can be used. A snagging propensity test checks that the membrane can stand the repeated snagging actions of roosting bats. This precautionary measure removes the risk to any bats that could find and utilise any sections of new roof.

5.2 Sensitive lighting

Foraging and commuting by at least four species of bat were recorded on Site during the surveys. Night-time working and increased operational lighting should be avoided where possible since artificial lighting is known to result in the loss of foraging habitat available and can also interfere with commuting routes from roosts (Stone, 2013).

If required during construction and operation, lighting should be kept to a minimum and follow guidance from the Bat Conservation Trust & ILP *'Bats and artificial lighting in the UK'* (2023). This includes:

- Direct any task lighting used during construction away from trees;
- Set any necessary security lighting on short timers (e.g. 1 minute) with a sensitivity to large moving objects only;

- Directional lighting or shielding such as hoods or cowls should be used to avoid light being directed at the sky or towards the boundary vegetation;
- Limit lighting times to provide dark periods;
- LED luminaires are preferred due to the lower intensity, sharp 'cut-off', colour rendition and dimming capability;
- All luminaires should lack UV elements and metal halide fluorescent sources should not be used;
- Avoid white and blue wavelengths of the light spectrum and keep the brightness of the lamps as low as feasibly possible; and
- Carefully consider the height of columns to avoid light spill.

5.3 General mitigation – Nesting birds

It should be noted that the buildings have the potential to support nesting birds. Demolition of any section of the buildings should be undertaken between September and February (inclusive) to avoid the breeding bird season. If this is not possible and works take place between March and the end of August, an ecologist should check potential nesting habitat immediately before works. Any active nests identified must be retained in-situ with a suitable buffer until the ecologist has confirmed that the chicks have fledged, and the nest is no longer active.

5.4 Ecological enhancements

National Planning Policy Framework (NPPF) states that local planning authorities should aim to conserve and enhance biodiversity where possible when determining planning applications. The development plans should maximise opportunities for enhancement, in order to achieve a net increase in biodiversity. This is in accordance with the NERC Act (2006) which requires that *“every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.”*

The measures outlined below will help improve the Site overall for biodiversity.

5.5 Habitats

Any new tree or shrub planting in the wider site should include a diverse mix of native species and a suitable list has been provided in **Appendix D**. It would also be beneficial for woodland management within the grounds to target the removal of non-native understorey species such as cherry laurel and rhododendron to improve the value of the woodland and in turn the foraging value for the local bat population.

6 SURVEY VALIDITY

Due to the highly mobile nature of bats and their unpredictable roosting habits, this assessment is considered valid for 12 months (i.e. August 2026), until the commencement of the 2026 bat activity season. After this, new potential roosting features may have been formed,

or new roosts may have been created. Therefore, if works have not been undertaken before this date, an update survey may be required.

7 CONCLUSION

This report is based on a PRA and emergence surveys undertaken in July-September 2024 and updated in August 2025. The house was found to support three day roosts for common pipistrelle and soprano pipistrelle bats. The proposals will result in the loss of the three day roosts and this has the potential to disturb or harm up to one common pipistrelle and five soprano pipistrelle (should they be present at the time of the works). Due to the low level of impact, it will be possible to follow the BMCL licensing approach. Appropriate mitigation measures will be required which minimise all potential impacts and ensure that the favourable conservation status of bats using the Site will be maintained. The proposals can accommodate the required mitigation measures.

8 BIBLIOGRAPHY

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Appendix A - Summary of Relevant Legislation and Policy

All British bats are fully protected under the Wildlife and Countryside Act 1981 (as amended) through inclusion in Schedule 5. They are also included in Schedule II of Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 which transpose Annex II of the Council Directive 92/43/EEC 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (“EC Habitats Directive”) which defines European protected species of animals.

Bat species are afforded further protection by the Countryside and Rights of Way (CROW) Act 2000; and the Natural Environment and Rural Communities Act 2006.

Under the above pieces of legislation, it is an offence to:

- kill, injure or take an individual;
- possess any part of an individual either alive or dead;
- intentionally or recklessly damage, destroy or obstruct access to any place or structure used by these species for shelter, rest, protection or breeding;
- intentionally or recklessly disturb these species whilst using any place of shelter or protection; or
- deliberate disturb in such a way as to be likely to impair their ability to:
 - survive, breed or reproduce, or to rear or nurture their young; or
 - in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
 - to affect significantly the local distribution or abundance of the species to which they belong;
 - keep (possess), transport, sell or exchange, or offer for sale or exchange, any live or dead bat, or any part of, or anything derived from a bat.

For any proposed works that could result in an unlawful activity in relation to bats (e.g. damage to a bat roost), it is possible to obtain a European Protected Species Mitigation (EPSM) licence or Bat Mitigation Class Licence (BMCL), to allow the works to proceed lawfully. A licence will only be issued following appropriate surveys and mitigation and only if Natural England are satisfied that all of the following three tests are met:

- The proposal is for ‘preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment’;
- There is no satisfactory alternative; and
- The action authorised by the license will not be detrimental to the maintenance of bat populations at a favourable conservation status in their natural range.

A bat roost is defined as “the resting place of a bat” (Bat Conservation Trust, 2017). More generally, a roost can be considered to be “any structure or place, which any wild bat uses for shelter or protection.”

National Planning Policy Framework (NPPF) December 2024

The NPPF aims to minimise impacts on biodiversity and provide net gains where possible, contributing to the Government's commitment to halt the overall decline in biodiversity. Chapter 15 '*Conserving and enhancing the natural environment*' details what local planning policies should consider with regard to planning applications.

Planning policies and decisions should contribute to and enhance the natural and local environment by:

180 a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

180 d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

185 a) Identify map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors, and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

185 b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity;

186 a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; and

186 d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

Regional Planning Policy

Relevant regional planning policies for South East England are detailed in the following documents.

The South East Plan (2009)

The South East Plan was published in May 2009. It has since been revoked with the exception of Policy NRM6 on the Thames Basin Heaths Special Protection Area (SPA). Policy NRM6 states "New residential development which is likely to have a significant effect on the ecological integrity of Thames Basin Heaths SPA will be required to demonstrate that adequate

measures are put in place to avoid or mitigate any potential adverse effects, such measures must be agreed with Natural England.”

Local Planning Policy

Mid Sussex District Plan 2014 – 2031

Mid Sussex District Council’s planning policy in relation to biodiversity includes Policy DP12 in the district plan (Adopted 2018) which states:

DP12: Protection and enhancement of countryside

Strategic Objectives: 3) To protect valued landscapes for their visual, historical and biodiversity qualities; 11) To support and enhance the attractiveness of Mid Sussex as a visitor destination; and 15) To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations.

Evidence Base: A Landscape Character Assessment for Mid Sussex, A Strategy for the West Sussex

Landscape, Capacity of Mid Sussex District to Accommodate Development Study.

The countryside will be protected in recognition of its intrinsic character and beauty.

Development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and:

- ☐ it is necessary for the purposes of agriculture; or
- ☐ it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.

Agricultural land of Grade 3a and above will be protected from non-agricultural development proposals. Where significant development of agricultural land is demonstrated to be necessary, detailed field surveys should be undertaken and proposals should seek to use areas of poorer quality land in preference to that of higher quality.

The Mid Sussex Landscape Character Assessment, the West Sussex County Council Strategy for the West Sussex Landscape, the Capacity of Mid Sussex District to Accommodate Development Study and other available landscape evidence (including that gathered to support Neighbourhood Plans) will be used to assess the impact of development proposals on the quality of rural and landscape character.

Built-up area boundaries are subject to review by Neighbourhood Plans or through a Site Allocations Development Plan Document, produced by the District Council.
Economically viable mineral reserves within the district will be safeguarded.

The District Plan also has specific planning Policy in relation to Ashdown Forest SPA and SAC in Policy DP17

DP17: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC)

Strategic Objectives: 3) To protect valued landscapes for their visual, historical and biodiversity qualities.

Evidence Base: Ashdown Forest Visitor Survey Data Analysis, Habitats Regulations Assessment for the Mid Sussex District Plan, Visitor Access Patterns on Ashdown Forest. In order to prevent adverse effects on the Ashdown Forest SPA and SAC, new development likely to have a significant effect, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Within a 400 metres buffer zone around Ashdown Forest, mitigation measures are unlikely to be capable of protecting the integrity of the SPA and, therefore, residential development will not be permitted. Within a 7km zone of influence around the Ashdown Forest SPA, residential development leading to a net increase in dwellings will be required to contribute to mitigation through:

- 1) The provision of Suitable Alternative Natural Greenspace (SANG) to the minimum level of 8Ha per 1,000 net increase in population; or a financial contribution to SANGs elsewhere; or the provision of bespoke mitigation; and
- 2) A financial contribution to the Ashdown Forest Strategic Access Management and Monitoring (SAMM) Strategy.

Large schemes proposed adjacent or close to the boundary of the 7km zone of influence may require mitigation for the SPA. Such proposals for development will be dealt with on a case-by case basis. Where bespoke mitigation is provided, these measures will need to be in place before occupation of development and must be managed and maintained in perpetuity. The effectiveness of such mitigation will need to be demonstrated prior to approval of the development. Bespoke mitigation will need to be discussed and agreed by the District Council as the competent authority following advice from Natural England.

Appendix B – Existing and Proposed Site Plan (Scandiahus, 2025)



Appendix C- Bat Survey Results



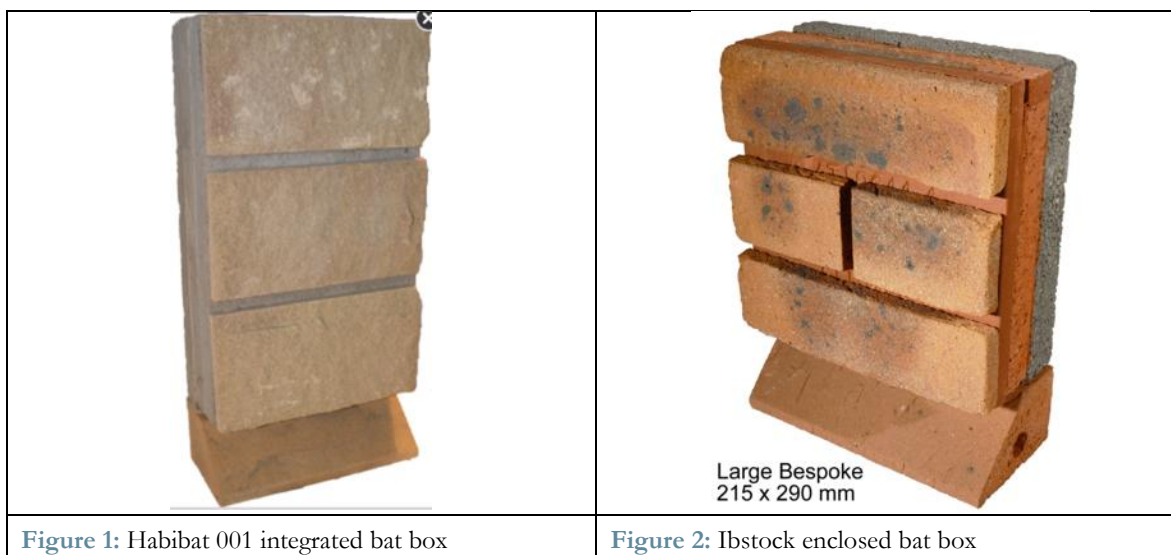
Surveyor	View at Start	View at End		
Surveyor 1				
Surveyor 2				
			Project	The Brook, Crawley Down
			Title	Surveyor views
			Drawing	Figure 2
			Date	11 th September 2025
				

Appendix D- Bat boxes

Integrated bat boxes

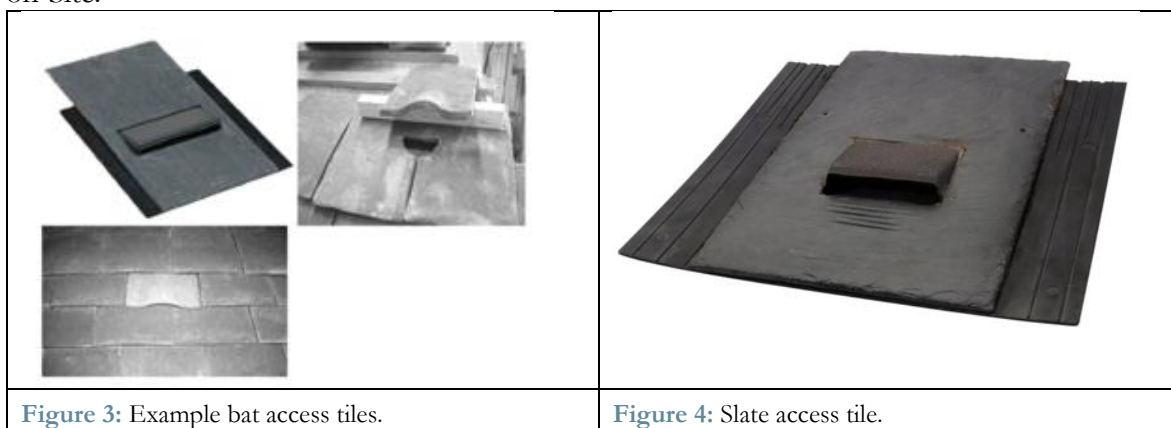
Integrated bat boxes (also known as bat tubes/bricks) should be integrated into the new walls to provide new roosting opportunities post-development. They should be installed at least 3.5m above the ground with no restricted flight lines by buildings or trees. The boxes should be installed away from windows and artificial light sources.

The recommended bat box models to be used are a Habibat 001 bat box (see **Figure 1**) or an Ibstock Enclosed Bat Box 'B' (see **Figure 2**). These boxes can be fronted with brick to match the building design to ensure that the integrated boxes are unobtrusive and aesthetically pleasing.



Roost access tiles

Roost access tiles could be included in the design. These allow access for bats to the crevice between the roof tiles and the lining underneath (see **Figures 3 & 4**). They come in a variety of finishes to match the roof or hanging tile covering, or alternatively can be created with lead on-Site.



Tree boxes

- Improved Crevice Box (**Figure 5**) - a good general-purpose bat box for crevice species such as pipistrelles that supports a range of species which can be hung on the retained trees around the Site. They should be positioned in a shady position, 3-5m above ground level, and face in a south/south-westerly direction with a clear flight path to and from the entrance.
- Eco Kent Bat Box (**Figure 6**)- a good general purpose bat box that supports crevice roosting species which can be hung on mature trees or buildings around the Site. It is a self-cleaning box. They should be positioned in a shady position, 4-6m above ground level, and face in a south/south-westerly direction with a clear flight path to and from the entrance.



Wildlife Friendly Planting (Natural England, 2008. Gardening with Wildlife in Mind. London: Natural England)

Native and wildlife friendly shrubs

COMMON NAME	SCIENTIFIC NAME
Hazel	<i>Corylus avellana</i>
Elder	<i>Sambucus nigra</i>
Goat willow	<i>Salix caprea</i>
Hawthorn	<i>Crataegus monogyna</i>
Dog rose	<i>Rosa canina</i>
Guelder rose	<i>Viburnum opulus</i>
Gorse	<i>Ulex europaeus</i>
Broom	<i>Cytisus scoparius</i>
Wayfaring tree	<i>Viburnum lantana</i>
Shrubby cinquefoil	<i>Potentilla fruticosa</i>
Raspberry	<i>Rubus idaeus</i>

Alder buckthorn	<i>Frangula alnus</i>
Wild privet	<i>Ligustrum vulgare</i>
Barberry	<i>Berberis</i> × <i>stenophylla</i>
Barberry	<i>Berberis vulgaris</i>
Bell heather	<i>Erica cinerea</i>
Bilberry	<i>Vaccinium myrtillus</i>
Black currant	<i>Ribes nigrum</i>
Blackthorn	<i>Prunus spinosa</i>
Buckthorn	<i>Rhamnus catharticus</i>
Butcher's-broom	<i>Ruscus aculeatus</i>
Cowberry	<i>Vaccinium vitis-idaea</i>
Cross-leaved heath	<i>Erica tetralix</i>
New Zealand holly	<i>Olearia macrodonta</i>
Daphne	<i>Daphne odora</i>
Dogwood	<i>Cornus sanguinea</i>
Field rose	<i>Rosa arvensis</i>
Firethorn	<i>Pyracanthus angustifolia</i>
Flowering Currant	<i>Ribes sanguineum</i>
Gooseberry	<i>Ribes uva-crispa</i>
Hebe 'Midsummer Beauty'	<i>Hebe</i> sp.
Holly	<i>Ilex aquifolium</i>
Japanese quince	<i>Chaenomeles japonica</i>
Lilac	<i>Syringa vulgaris</i>
Mexican orange	<i>Choisya ternata</i>
Mezereum	<i>Daphne mezereum</i>
Midland hawthorn	<i>Crataegus laevigata</i>
Osier	<i>Salix viminalis</i>
Portugal laurel	<i>Prunus lusitanica</i>
Privet	<i>Ligustrum ovalifolium</i>
Purple willow	<i>Salix purpurea</i>
Snowy mespilus	<i>Amelanchier canadensis</i> , <i>Amelanchier lamarckii</i>
Spindle	<i>Euonymus europaeus</i>
Spurge laurel	<i>Daphne laureola</i>
Sweet briar	<i>Rosa rubiginosa</i>
Wild privet	<i>Ligustrum vulgare</i>

Native and wildlife-friendly trees

Common Name	Scientific Name
Pedunculate oak	<i>Quercus robur</i>
Ash	<i>Fraxinus excelsior</i>
Wych elm	<i>Ulmus glabra</i>
Whitebeam	<i>Sorbus aria</i> agg.
Rowan	<i>Sorbus aucuparia</i>
Aspen	<i>Populus tremula</i>
Apple	<i>Malus domestica</i>
Bird cherry	<i>Prunus padus</i>
Common alder	<i>Alnus glutinosa</i>
Crab apple	<i>Malus sylvestris</i>
Crack willow	<i>Salix fragilis</i>
Downy birch	<i>Betula pubescens</i>
Field maple	<i>Acer campestre</i>
Hornbeam	<i>Carpinus betulus</i>
Juniper	<i>Juniperus communis</i>
Large-leaved lime	<i>Tilia platyphyllos</i>
Small-leaved lime	<i>Tilia cordata</i>
Pear	<i>Pyrus communis</i>
Scots pine	<i>Pinus sylvestris</i>
Sessile oak	<i>Quercus petraea</i>
Silver birch	<i>Betula pendula</i>
Sweet chestnut	<i>Castanea sativa</i>
Wild cherry	<i>Prunus avium</i>
Wild service-tree	<i>Sorbus torminalis</i>
Yew	<i>Taxus baccata</i>