



Date: 28 August 2025

Our ref: 08178

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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/25/1705
Location: Sunte House Birchen Lane Haywards Heath West Sussex
Proposal: Proposed demolition and removal of roof canopy and stairs to existing garage and replace with new wooden staircase. Proposed construction of rear extension to main house and extension linking the Dairy and Toolshed outbuildings. Proposed construction of new poolhouse and associated external and internal works, including window replacements.

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

No ecological objection	☐
No ecological objection subject to attached conditions	☒
Further information required/Temporary holding objection	☐
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐

Summary

We have reviewed the Preliminary Ecological Appraisal report (Urban Edge Environmental Consulting, May 2024) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures and mandatory Biodiversity Net Gain.

The Bat Survey report (Urban Edge Environmental Consulting, November 2024) identified a Common Pipistrelle day roost emerging from building B1. As recommended in the Bat Survey report (Urban Edge Environmental Consulting, November 2024), a Bat Mitigation Class Licence will need to be sought from Natural England, prior to commencement of works, because there is a confirmed bat roost in the building on-site which has been proposed for roof works. A consultant with a Bat Mitigation Class Licence (CL21) could register the site under their licence, as the scheme is of low impact to the favourable conservation status of Common Pipistrelle. A copy of either a European Protected Species mitigation licence or evidence of site registration by an individual registered to use a Bat Mitigation Class Licence should be submitted to the LPA and secured by a condition of any consent.

We note that there is Priority habitat on and adjacent to the site, in the form of two Ancient Trees, Lowland Mixed Deciduous Woodland, and Hedgerows. However, as the current proposal does not propose any works which will impact these habitats, the mitigation measures identified within the Preliminary Ecological Appraisal report (Urban Edge Environmental Consulting, May 2024) will be sufficient to minimise impacts on Priority habitat.

We have also reviewed the information submitted relating to mandatory biodiversity net gains.

We are satisfied that there is sufficient ecological information available to support determination of this application.

This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

The mitigation measures identified in the Preliminary Ecological Appraisal report (Urban Edge Environmental Consulting, May 2024) should be secured by a condition of any consent and implemented in full. This is necessary to conserve and enhance protected and Priority species particularly those recorded in the locality.

An increase in artificial light would negatively impact foraging bats. We recommend lighting details are in line with best practice guidance GN:08/23 from the Institute of Lighting Professionals¹ and secured by a condition of any consent.

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](#). It is our understanding that mandatory biodiversity net gains do not apply for this application, as it is a householder application and consists only of modifications to an existing single dwelling. Therefore, we are satisfied that sufficient information that the development meets the de-

¹ <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

minimis exemption. As a result, we are satisfied that the development is exempt from the statutory requirement of mandatory biodiversity net gains.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 187d and 193d of the National Planning Policy Framework (December 2024). The reasonable biodiversity enhancement measures detailed within the Preliminary Ecological Appraisal report (Urban Edge Environmental Consulting, May 2024) should be implemented in full and should be secured by a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended) and delivery of mandatory Biodiversity Net Gain.

Impacts will be minimised such that the proposal is acceptable, subject to the conditions below based on BS42020:2013. We recommend that submission for approval and implementation of the details below should be a condition of any planning consent.

Recommended conditions

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

“All mitigation measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal report (Urban Edge Environmental Consulting, May 2024) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.”

Reason: To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

2. PRIOR TO COMMENCEMENT OF ANY WORKS WHICH WILL IMPACT THE BREEDING / RESTING PLACE OF BATS: SUBMISSION OF A COPY OF EPS MITIGATION LICENCE OR EVIDENCE OF SITE REGISTRATION UNDER A BAT MITIGATION CLASS LICENCE FOR BATS

“Any works which will impact the resting place of bats, shall not in in any circumstances commence unless the local planning authority has been provided with either:

- a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or*
- b) evidence of site registration supplied by an individual registered to use a Bat Mitigation Class Licence; or*
- c) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence.”*

Reason: To conserve protected species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s17 Crime & Disorder Act 1998.

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

Hallie Rees MSci (Hons)

A Current Qualifying Member of CIEEM

Assistant 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.