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Our ref: 14218  
Date: 26 February 2026

By email only: Planning Department, [planninginfo@midsussex.gov.uk](mailto:planninginfo@midsussex.gov.uk)

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*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.*

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**Application:** DM/25/2991  
**Location:** North Hall Staplefield Lane Staplefield Haywards Heath  
**Proposal:** Conversion of the first floor of the Granary to facilitate ancillary accommodation to the main house together with associated minor external alterations. (Amended plans received 04.02.2026)

Thank you for consulting Place Services on the above full planning application

<b>No ecological objection</b>	<input type="checkbox"/>
<b>No ecological objection subject to attached conditions</b>	<input checked="" type="checkbox"/>
<b>Further information required/Temporary holding objection</b>	<input type="checkbox"/>
<b>Recommend Refusal</b>	<input type="checkbox"/>
<b>Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment</b>	<input type="checkbox"/>

### **Summary**

We have reviewed the Preliminary Roost Assessment (Arbtech, July 2025) and the Bat Emergence and Re-Entry Surveys (Arbtech, October 2025) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures.

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 Bat Emergence and Re-Entry Surveys (Arbtech, October 2025) 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.

The Bat Emergence and Re-Entry Surveys (Arbtech, October 2025) recommends that a Bat Mitigation Strategy/Precautionary Working Method Statement (PWMS) for bats should be secured by condition of any consent, in order to mitigate potential impacts of works on 6 confirmed Common Pipistrelle day roosts in adjacent building B2. Any PWMS should be in line with the UK Bat Mitigation Guidelines<sup>1</sup>, which sets out the requirements of a Precautionary Working Method Statement in Figure 6.5 of the document. The PWMS must also set out the provision of compensation measures for the loss of any Potential Roost Features in advance of works, in line with Table 6.3. of the Bat Survey Guidelines<sup>2</sup>. This can include the provision of bat boxes or other features outlined in the UK Bat Mitigation Guidelines.

We also recommend that a Wildlife Sensitive Lighting Design Scheme, in line with best practice guidance GN:08/23 from the Institute of Lighting Professionals<sup>3</sup> is secured by a condition of any consent, in order to minimise potential impacts of external lighting on roosting, foraging, and commuting bats in the surrounding area.

With regard to mandatory biodiversity net gains, this application satisfies the definition for a De Minimis Exemption as it consists only of external renovations to an existing building. Government Advice on Biodiversity Net Gain states the exemption applies where the development does not impact Priority habitat and impacts less than 25m<sup>2</sup> of on-site habitat or 5 metres of on-site linear habitats such as hedgerows. Therefore, we are satisfied that this application can be described as 'Below the Threshold' and is exempt from the requirement to identify and pursue opportunities for securing a measurable biodiversity net gain, equivalent to a 10%.

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<sup>1</sup> Reason, P.F. and Wray, S. (2025). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.2. Chartered Institute of Ecology and Environmental Management, Ampfield.

<sup>2</sup> Collins, J. (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines. 4th edition. Bat Conservation Trust, London.

<sup>3</sup> <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

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). Reasonable biodiversity enhancement measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Enhancement Strategy to be secured as 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 Bat Emergence and Re-Entry Surveys (Arbtech, October 2025) 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: BAT METHOD STATEMENT**

*“A Bat Method Statement, in line with the details contained in the Bat Emergence and Re-Entry Surveys (Arbtech, October 2025) shall be submitted to and approved in writing by the local planning authority. This will contain precautionary mitigation measures and/or works to reduce potential impacts to bats during the construction phase.*

*The measures and/works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.”*

**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).

3. **PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY**

*“Prior to any works above slab level, a Biodiversity Enhancement Strategy for protected, Priority and threatened species, prepared by a suitably qualified ecologist in line with the recommendations of the Bat Emergence and Re-Entry Surveys (Arbtech, October 2025), shall be submitted to and approved in writing by the local planning authority.*

*The content of the Biodiversity Enhancement Strategy shall include the following:*

- a) *Purpose and conservation objectives for the proposed enhancement measures;*
- b) *detailed designs or product descriptions to achieve stated objectives;*
- c) *locations of proposed enhancement measures by appropriate maps and plans (where relevant);*
- d) *persons responsible for implementing the enhancement measures; and*
- e) *details of initial aftercare and long-term maintenance (where relevant).*

*The works shall be implemented in accordance with the approved details shall be retained in that manner thereafter.”*

**Reason:** To enhance protected, Priority and threatened species and allow the LPA to discharge its duties under paragraph 187d of NPPF 2024 and s40 of the NERC Act 2006 (as amended).

4. **PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**

*“Prior to occupation, a “lighting design strategy for biodiversity” for external lighting in accordance with Guidance Note 08/23 (Institute of Lighting Professionals) shall be submitted to and approved in writing by the local planning authority. The strategy shall:*

- a) *identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and*

b) *show how and where external lighting will be installed (through provision of appropriate lighting plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.”*

**Reason:** To 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).

Please 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



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.*