



23rd December 2024

Caroline Grist
Mid Sussex District Council
Oaklands Road
Haywards Heath
RH16 1SS

By email only

Thank you for requesting advice on this outline 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/24/2686
Location: St Pauls Catholic College Jane Murray Way Burgess Hill West Sussex RH15 8GA
Proposal: Proposed demolition of the existing caretaker garage to be replaced with a two storey side extension to the existing caretaker house. A complete new replacement roof and remodelling of the building to convert it into a reception area, offices and meeting rooms. The existing entrance is to be redeveloped into a new access with additional parking to the front and a new outdoor terrace is proposed at the rear.

Dear Caroline

Thank you for consulting Place Services on the above application.

Temporary Holding Objection pending further information on European Protected Species (bats) and mandatory Biodiversity Net Gain	Yes
No ecological objections	
Recommended Approval subject to attached conditions	
Recommended Discharge of condition	

Summary

We have reviewed the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Limited, September 2024), relating to the likely impacts of development on designated sites, protected and Priority species & habitats, identification of appropriate mitigation measures and mandatory Biodiversity Net Gain.

We are not satisfied that there is sufficient ecological information available for determination of this application for the reasons outlined below:



European Protected Species (bats)

We note from the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Limited, September 2024) that Building B1 (two storey brick-built building with attached garage) has high bat roost potential. We therefore agree that three bat emergence/re-entry surveys should be undertaken on this building between May and September. We recommend that the results and details of any mitigation measures need to be submitted to the LPA prior to determination.

This information is required to provide the LPA with certainty of impacts on legally protected species and to 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.

The information on bats is required prior to determination because paragraph 99 of the ODPM Circular 06/2005 highlights that: *"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision."*

Mandatory Biodiversity Net Gain:

In addition, the Biodiversity Net Gain Statutory Metric (Excel spreadsheet) should be submitted to the LPA prior to determination to enable a full review to be made of the Biodiversity Net Gain calculations.

Additional information

As Hedgehog may be onsite, we support the Precautionary Method Statement for mobile species in the Conclusions, Impact or Recommendations section of the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Limited, September 2024). Implementation should be secured by a condition of any consent.

We also support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Limited, September 2024) to avoid impacts from light disturbance. This should be secured by a condition of any consent and implemented in full. 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 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 should be outlined within a Biodiversity Enhancement Layout and should be secured by a condition of any consent.

Please note we have no comments on Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the [NatureSpace Partnership](#).

Please contact us with any queries.

Yours sincerely,

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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.