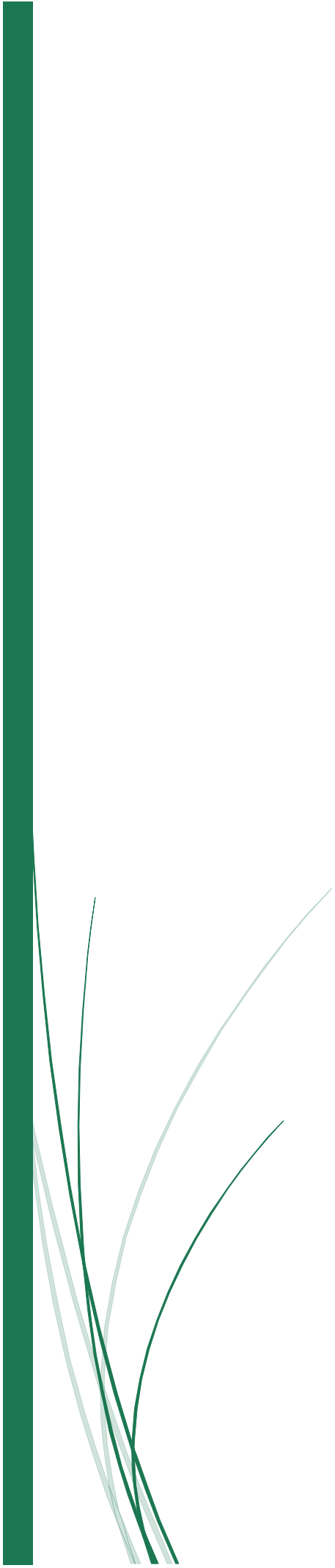




Sackville College, High Street, East Grinstead

Preliminary Bat Roost Assessment (PBRA)

A Report for Lee Evans Partnership

October 2025



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Ecological
Solutions**

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Sackville College, High Street, East Grinstead, RH19 3BX

Preliminary Bat Roost Assessment (PBRA)

Client:	Lee Evans Partnership	
Project Ref:	J25-000238	
Report Ref:	Sackville College	
Author:	Technical Review:	Approved:
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Revision Ref:	Status/ Comment:	Date of Issue:
-	Issued in draft for client comment	03.10.2025
Disclosure:		
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Figure 1 Wall and PRF Locations Plan

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1 PROJECT OVERVIEW

Client: Lee Evans Partnership

Site Address: Sackville College, High Street, East Grinstead, RH19 3BX

Lead Ecologist: Lauren Hook BSc (Hons) MSc

Attending Ecologists: Guy Newman BSc (Hons), MCIEEM, Director, NE Bat Class Licence Level 2
Lauren Hook BSc (Hons) MSc, Ecologist

Survey Date: 13th August 2025

Site Proposals: Repairs to a retaining boundary wall.

Associated Planning Reference Number: Not yet submitted.

Source of Relevant Documents:

Document:	Source:
Site Location Plan:	Lee Evans Partnership – Sackville College – Site Plan – Drawing number - 08681a-A-L-(00)-002
Site Plans:	Lee Evans Partnership – Specification for Repairs to Boundary Wall – LEP Ref: 8681a Rev A
Desk Study	Magic.gov.uk

2 NON-TECHNICAL SUMMARY

- 2.1 In response to the proposed works at Sackville College, East Grinstead ('the Site'), a Preliminary Bat Roost Assessment (PBRA) of a retaining boundary wall was conducted.
- 2.2 Seven Potential Roosting Features (PRFs) suitable to support roosting bats were recorded within the wall. The PRFs were subject to endoscopic inspection and no bats, nor evidence of bats, was recorded.
- 2.3 Current proposals anticipate the retention of all seven PRFs and therefore, no further consideration to bats within these PRFs is considered proportionate. Should the scope of works change and PRFs be affected, further consideration to roosting bats within the wall would be required.
- 2.4 It is recommended that immediately prior to works, all areas to be subject to repair should be subject to inspection by a bat licenced ecologist with the use of a high-powered torch and an endoscope to confirm whether bats are present.
- 2.5 Should no bats be recorded within the areas to be affected during the pre-works check, bats are considered likely absent from the features and works can proceed accordingly.
- 2.6 Should bats be recorded within the features during the pre-works inspection or be recorded during works, all works must **stop** and an appropriate European Protected Species Mitigation Licence obtained from Natural England.
- 2.7 Lighting can be detrimental to foraging and commuting bats. Any external lighting proposed for the restoration works should be sensitive to the PRFs and any surrounding vegetation avoiding direct illumination of them.
- 2.8 The wall has the potential to support nesting birds. Evidence of birds, in the form of droppings, was recorded during the survey. It is recommended that works are conducted outside the core breeding period for birds of late February – August inclusive.
- 2.9 In addition, recommendations for enhancements in line with the National Planning Policy Framework (NPPF) 2024 have been provided.

3 INTRODUCTION

3.1 Context

- 3.1.1 Greenspace Ecological Solutions Ltd (GES) was commissioned In July 2025 to undertake a Preliminary Bat Roost Assessment (PBRA) of a boundary wall at Sackville College, East Grinstead (hereafter referred to as “the Site”). The survey was required to inform a planning application for repairs to the boundary wall within the Site.

3.2 Site Location

- 3.2.1 The Site is in the town of East Grinstead, West Sussex at National Grid reference: TQ 39823 38016. The geographical location of the Site is depicted in Image 1, below. Photographs of the Site are provided in Appendix A.



Image 1 – Geographical Location of the Site

3.3 Site Description

- 3.3.1 The Site comprises a retaining boundary wall to the east of Sackville College (a Grade I Listed Building), East Grinstead. The Site is bounded by the gardens of Sackville College to the north, south and west and the B2110 to the east.
- 3.3.2 The wider landscape is largely urban with residential properties, commercial and industrial areas; tree lines, areas of green open space and hedgerows are also present.

3.4 Legislation and Planning Policy

Bats

- 3.4.1 All British bat species and their places of rest and shelter receive UK and European protection under the [Conservation of Habitats and Species Regulations 2017 \(as amended\)](#) and the [Wildlife and Countryside Act \(WCA\) 1981 \(as amended\)](#). This protection means that bats and their places of rest and shelter are a material consideration in the planning process.
- 3.4.2 Taken together, unless under mitigation licence, these make it an offence to:
- Deliberately capture or intentionally take a bat
 - Deliberately or intentionally kill or injure a bat
 - To be in possession or control of any live or dead bat or any part of, or anything derived from a bat
 - Damage or destroy a breeding site or resting place of a bat
 - Intentionally or recklessly obstruct access to any place that a bat uses for shelter or protection
 - Intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection
 - Deliberately disturb any bat, in particular any disturbance which is likely to (i) impair their ability to survive, breed, reproduce or to rear or nurture their young; or in the case of hibernating or migratory species, to hibernate or migrate; or (ii) to affect significantly the local distribution or abundance of the species to which they belong.
- 3.4.3 A bat roost may be any structure a bat uses for breeding, resting, shelter or protection. It is important to note that since bats tend to use the same roost sites at different times of year, current legal opinion is that a bat roost is protected whether or not the bats are present at the time.
- 3.4.4 In addition to the above, certain species of bat are listed on Annex II of the Habitat Regulations 2017 (as amended). Annex II species include greater and lesser horseshoe bats *Rhinolophus ferrumequinum* and *R. hipposideros*, respectively, barbastelle *Barbastella barbastellus* and Bechstein's bat *Myotis bechsteinii*. Where present, consideration to the requirement of Special Areas of Conservation (SAC) should be given.
- 3.4.5 The above is intended only as a brief introduction to the law concerning the protected species potentially relevant to the Site. Reference should always be made to the full text of the legislation if more detailed interpretation is needed.

National Planning Policy Framework

- 3.4.6 The [National Planning Policy Framework \(NPPF\) 2024](#) (as amended) aims to protect species of significant conservation importance in England (in this case bats), as covered by wildlife legislation (see above), NPPF, national and local Biodiversity Action Plans (BAP) and Section 41 (s41) of the Natural Environment and Rural Communities (NERC) Act 2006.

Local Planning Policy

- 3.4.7 [Policy DP38 Biodiversity of the Mid Sussex District Plan \(2014-2031\)](#) ensures that “*Biodiversity will be protected and enhanced by ensuring development:*

- *protects existing biodiversity, so that there is no net loss of biodiversity. Appropriate measures should be taken to avoid and reduce disturbance to sensitive habitats and species. Unavoidable damage to biodiversity must be offset through ecological enhancements and mitigation measures (or compensation measures in exceptional circumstances);*
- *Minimises habitat and species fragmentation and maximises opportunities to enhance and restore ecological corridors to connect natural habitats and increase coherence and resilience; and*
- *Promotes the restoration, management and expansion of priority habitats in the District; and*
- *Avoids damage to, protects and enhances the special characteristics of internationally designated Special Protection Areas, Special Areas of Conservation; nationally designated Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty; and locally designated Sites of Nature Conservation Importance, Local Nature Reserves and Ancient Woodland or to other areas identified as being of nature conservation or geological interest, including wildlife corridors, aged or veteran trees, Biodiversity Opportunity Areas, and Nature Improvement Areas.*

3.5 Survey Objectives

3.5.1 The objectives of the survey were as follows:

- Determine the suitability of the retaining wall to support roosting bats.
- Record any evidence of roosting bats.
- Evaluate the potential for bats and their roosts to be affected by the proposals.
- Identify the requirement for licensing for the works to proceed lawfully.
- Provide appropriate recommendations for further surveys and mitigation, where required, as well as opportunities for biodiversity enhancements.

3.6 Survey Constraints

3.6.1 All measurements or indications of area provided within this report are approximate and are provided as a guide only.

4 METHODS

4.1 Desk Study

- 4.1.1 The proposals are restricted to works on the retaining boundary wall to the east of Sackville College with habitats around the periphery remaining largely unaffected.
- 4.1.2 In response, the desk study consisted of a search of existing freely available records of European Protected Species (EPS) mitigation licences, restricted to bats only, within 2km, and records of designated sites within 1km. As it was deemed to add no significant value to the proposals, no paid record search was obtained in this instance.
- 4.1.3 The following bodies were consulted for the desk study:
- Google Earth Pro for aerial imagery.
 - Magic Map (available at [Magic.defra.gov.org](https://magic.defra.gov.org)) for records of designated sites within 1km, and European Protected Species Mitigation Licences within 2km

4.2 Preliminary Bat Roost Assessment (PBRA)

- 4.2.1 A full external inspection was undertaken of the entire length of the retaining wall within the Site. Conducted in line with current BCT good practice survey guidance (Collins, 2023), the external inspection comprised a detailed search using a high-powered torch and telephoto camera.
- 4.2.2 Potential roosting and/or access points for bats, such as cracks in brick/blockwork, missing mortar and crevices, were recorded and searched for evidence of use by bats (staining, droppings, scratch marks, or bats themselves).
- 4.2.3 The results of the PBRA enabled the Potential Roosting Features (PRFs) to be categorised as having either 'none,' 'negligible,' 'low,' 'moderate,' or 'high' suitability for roosting bats.
- 4.2.4 Any identified PRFs were subject to further inspection with the use of a RIDGID CA-350x endoscope by a Natural England Level 2 licensed bat ecologist to confirm the presence or absence of bats within the features.

5 SURVEY RESULTS

5.1 Desk Study

Designated Sites

- 5.1.1 The desk study returned no records of statutory designated sites of relevance to bats within 1km of the Site.

European Protected Species Mitigation Licences (EPSMLs)

- 5.1.2 Granted EPSMLs for bats within 2km of the Site returned by the desk study are detailed in Table 1.

Table 1 – Granted EPSMLs within 2km of the Site

Licence Reference	Licence Description	Licence Dates	Distance and Orientation from Site
2017-31493-EPS-MIT	Destruction of a common pipistrelle resting place	2017 – 2022	0.4km W
2015-15233-EPS-BDX	Destruction of a common pipistrelle breeding site and resting place	2015 – 2016	0.5km SE
2020-49337-EPS-MIT	Destruction of a common pipistrelle resting place	2020 – 2026	1.2km NW
EPSM2012-4152	Destruction of a common pipistrelle resting place	2012 – 2017	1.2km N
2018-34037-EPS-MIT	Destruction of a brown long-eared and common pipistrelle resting place	2018 – 2023	1.3km NW
2018-37923-EPS-MIT	Destruction of a common pipistrelle resting place	2019 – 2020	1.3km NE
2018-37924-EPS-MIT	Destruction of a common pipistrelle resting place	2019 – 2020	1.3km NE
EPSM2010-1891	Destruction of a brown long-eared and common pipistrelle resting place	2010 – 2012	1.4km NW
EPSM2012-3949	Destruction of a brown long-eared and Whiskered bat resting place	2012	1.6km NE

5.2 Preliminary Bat Roost Assessment

- 5.2.1 The retaining wall within the Site was assessed for its suitability to support roosting bats. For clarity, the retaining wall was divided into three sections; W1, W2 and W3. For the locations of each wall section and potential roosting features present, reference should be made to the Wall and PRF Locations Plan (Figure 1), and photographs in Appendix A.

W1

- 5.2.2 W1 is the western-most section of the retaining wall. This section consists of a sandstone wall plinth with a 1m high clay brick wall above. A holly *Ilex aquifolium* hedge is present along the entire length c.2m high. The wall is generally in good condition with occasional areas of missing mortar. It was considered that this area of the wall had **no suitability for roosting bats** due to its height and lack of suitable crevices.

W2

- 5.2.3 W2 consists of stone blocks. This area of wall is a continuation of W1, and the holly hedge continues along the entire length of W2. W2 is varied in height starting at c.0.5m at the western end and extending to c.2m at the eastern end due to the topography of the surrounding landscape. Two PRFs were noted within this section of the wall as described in Table 2 below.

Table 2 – PRFs within section W2

PRF Ref	PRF Description	Height from Ground	Photo	Level of Suitability
PRF – 1	There is an area of missing block work c.0.75m x 0.75m towards the eastern end of the section. Several gaps between bricks are present within the broken area of the wall. Two cavities are present, the first goes straight up c.30cm and is free of cobwebs and detritus. The second extends c.1m to the west and is also free of cobwebs and detritus. The feature provides access between the double row of stone and appears to be in use by wildlife, likely birds. No bats or evidence of bats was recorded.	c.0.5m		Moderate

PRF – 2	Missing mortar joint on top of a sandstone block. Entrance c.10cm x 10cm and extends back into the wall c.1.25m. Cavity clear of detritus. No bats or evidence of bats was recorded.	c. 0.4m		Moderate
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W3

- 5.2.4 W3 also consists of stone blocks. W3 is a continuation of W2 however the height of W3 extends to c.4m high. Overhanging vegetation largely in the form of ivy *Hedera helix* and bramble *Rubus fruticosus* agg. is present at the top of this section of the wall. Five PRFs were recorded within W3 as described in Table 3 below.

Table 3 – PRFs within section W3

PRF Ref	PRF Description	Height from Ground	Photo	Level of Suitability
PRF – 3	A 10cm x 5cm gap between a piece of brick / slate within ivy cover. Feature extends c.10cm deep and c.20cm high behind the second row of brick. An opening is present at the top of the feature which reduces its suitability for bats. The feature is currently in use by birds with bird droppings present. No bats or evidence of bats was recorded.	c.1.75m		Moderate
PRF – 4	A hole in the stone with a c.8cm circular entrance which extends c.1m back into the wall. Feature free of cobwebs. No bats or evidence of bats was recorded.	c.0.5m		Moderate

PRF – 5	A triangular gap in the brickwork from missing mortar extending c.30cm back. The feature is close to a streetlight which likely results in lighting impacts. The feature is free from cobwebs. No bats or evidence of bats was recorded.	c.2.3m		Moderate
PRF – 6	A c.20cm tall x 10cm wide gap which provides access into a cavity behind a block and sandstone bolder. The feature extends c.1m back into the wall. No cobwebs were present, but the feature was very dusty. No bats or evidence of bats was recorded.	c.2.5m		Moderate
PRF – 7	A hole formed by a missing bolder / brick which provides an access point into the wall. The feature extends c.1m backwards behind sandstone blocks and is heavily eroded and dusty. No bats or evidence of bats was recorded.	c.0.75m		Moderate

6 EVALUATION, MITIGATION AND CONCLUSIONS

6.1 Evaluation

Bats

- 6.1.1 In accordance with current BCT good practice guidelines (Collins, 2023), a Preliminary Bat Roost Assessment (PBRA) was undertaken on the retaining wall to the east of Sackville College in August 2025.
- 6.1.2 Seven PRFs with suitability to support roosting bats were recorded. Current proposals anticipate the retention of all seven PRFs, and no further surveys are considered necessary in this instance.
- 6.1.3 Should proposals change and any of the PRFs be affected by the proposed works, a further inspection of the features would be required to ensure works are conducted in line with the Bat Conservation Trust's survey guidelines (Collins, 2023) and that Reasonable Effort to determine the presence/ likely absence of roosting bats is applied.

Birds

- 6.1.4 The wall has the potential to support nesting birds. Evidence of birds, in the form of droppings, was recorded during the survey.

6.2 Mitigation

Bats

Precautionary Working Methods

- 6.2.1 Due to the overall suitability of the wall to support roosting bats, with several areas of missing mortar, cracks in the brickwork and missing blocks, and due to overhanging vegetation potentially obscuring PRFS, precautionary working methods are considered sufficient to protect roosting bats in the unlikely event that they are present within the areas to be affected by the repair works:
- In accordance with the Bat Mitigation Guidelines (Reason, P.F. and Wray, S. (2025)), works to the wall should be conducted during the period 1st October – 30th November and/or 1st March – 31st April in any given year (during weather conditions conducive for bats being active i.e. consecutive nights of 7°C or above at dusk, and no heavy rain/strong winds). Working in this period will further reduce/omit the potential for summer roosting and/or hibernating bats to be present.
 - Prior to the start of any works, the contractors working on the project must be subject to a 'Toolbox Talk' by a suitably qualified and licensed Ecological Clerk of Works (ECoW). The 'Toolbox Talk' will outline:

- the current legislation related to bats and their roosts.
 - the appropriate way to proceed with the work.
 - what to do in the unlikely event that a bat is found on-site when an ecologist is not present.
- Prior to the commencement of any works, gaps / cracks / holes to be infilled should be subject to an inspection by a suitably qualified and licensed ecologist with the use of a high-powered torch and an endoscope.
 - Should any overhanging vegetation require removal to facilitate the repairs, the areas exposed by the removal of vegetation should be subject to further inspection to identify whether any further PRFs are present. Should any additional PRFs be revealed, these should be subject to an inspection by a suitably qualified and licensed ecologist with the use of a high-powered torch and an endoscope.
 - Following re-inspection of all features, should the pre-commencement inspection confirm that no bats are present, repair works can begin. All works should be undertaken by hand, at the appropriate time of year and under the supervision of a Natural England level 2 licensed bat ecologist.
 - Should at any point, a roosting bat be found, works that are likely to affect bats will stop/will not commence, and the project ecologist contacted on how best to proceed. In this event, it is likely that works will not be able to recommence until an appropriate mitigation licence has been sought and obtained from Natural England.

Lighting

- 6.2.2 To mitigate the impact of artificial lighting on bat activity, external lighting required to facilitate the works, should be sympathetic to the requirement of bats, and should ensure no direct illumination of the retained vegetated boundaries of the Site or any of the retained PRFs. External lighting should be kept to the minimum required for safety and security and should be achieved using highly directional L.E.D. and/or PIR activated lighting with no upward light spill and no ultraviolet component (ideally of a colour temperature of 2700K or less). Details on appropriate lighting products and designs for bats has been produced by the BCT and the Institution of Lighting Professionals (BCT and ILP, 2023) in their guidance note 08/23; Bats and Artificial Lighting in the UK.
- 6.2.3 In the unlikely event that a bat or evidence of roosting bats is identified during the works, all works must stop until Natural England and/or the appointed ecologist be contacted on the appropriate way to proceed.

Birds

6.2.4 As all nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended) it is recommended that works to the wall are conducted outside the core breeding period for birds of late February – August inclusive.

6.2.5 Should this timeframe be unobtainable, a survey for the presence of breeding birds should be conducted by a suitably experienced ecologist immediately prior to the start of works. Should evidence of breeding birds be recorded, works within 5m of the nest, or works that have the suitability to destroy the nest(s), should stop until the eggs have hatched, and the chicks fledged, or the nest is deemed by a suitably experienced ecologist to no longer be active.

6.3 Conclusions

6.3.1 Provided the above mitigation strategy is implemented in full, the Favourable Conservation Status of bats will be maintained within the Site, and the proposed works will not contravene any legislation or planning policies pursuant to bats, or nesting birds.

7 ECOLOGICAL ENHANCEMENTS

7.1 Bat Box

- 7.1.1 In line with the requirements of the NPPF (2024), it is recommended that a minimum of one tree-mounted bat box such as [Schwegler 1FF bat box](#), [Schwegler 2FN bat box](#) and/or [Kent bat box](#) model types (or similar, woodcrete alternative) is erected on a mature tree within the wider Site ownership. To maximise efficacy, the box should be installed securely onto the main stem of a suitable retained tree at a height of $\geq 3\text{m}$, close to other mature trees or tree lines, away from any artificial lighting and ideally on a south/south-west/south-east aspect, with a clear flight line (i.e. unobstructed by branches or lots of ivy cluttering the access point) to the box.

7.2 Bird Box

- 7.2.1 It is recommended that a minimum of one tree-mounted bird box such as an [open-fronted](#) or [hole-fronted](#) nesting box (or similar) be erected on a mature tree within the wider Site ownership. To maximise suitability, the box should be installed securely onto the main stem of a suitable retained tree on sheltered aspects close to vegetation at a height of 2-3m, preferably on north, north-east or north-west facing elevations.

8 REFERENCES

Bat Conservation Trust and the Institute of Lighting Professionals (BCT&ILP) 2023. Guidance Note 8; Bat and Artificial Lighting in the UK.

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

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

National Planning Policy Framework (NPPF) (2024).

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

Natural Environment and Rural Communities (NERC) Act 2006.

<http://www.legislation.gov.uk/ukpga/2006/16/contents>

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.

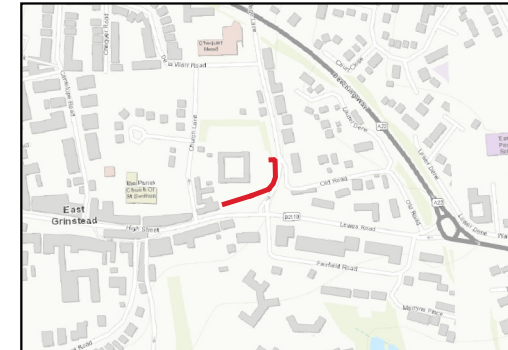
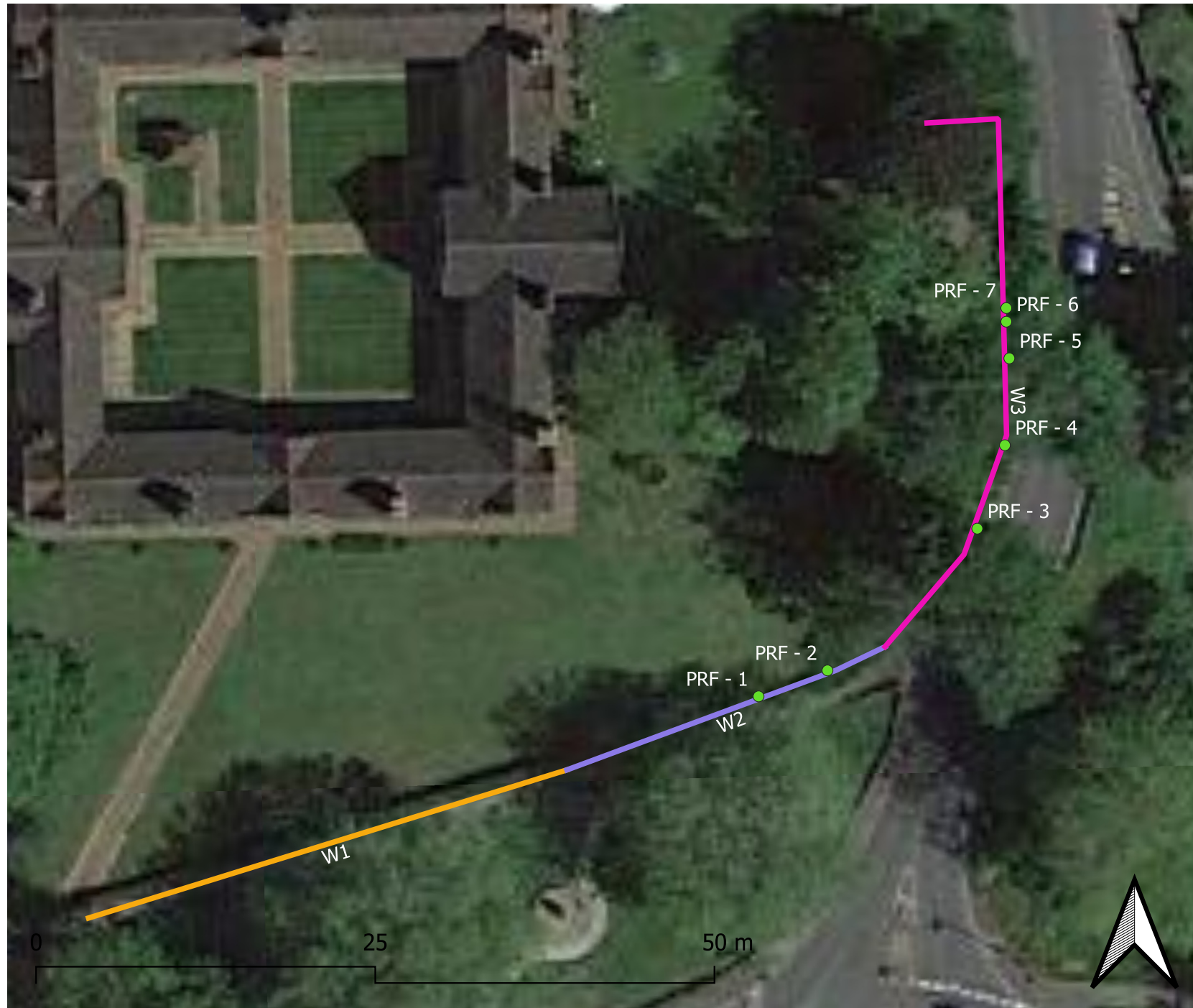
The Conservation of Habitats and Species Regulations (as amended) 2017

<https://www.legislation.gov.uk/uksi/2019/579/regulation/35/made>

Wildlife and Countryside Act (as amended) 1981. <http://jncc.defra.gov.uk/page-1377>

Figures

J25-000238 - Sackville College - Figure 1: Wall and PRF Locations Plan



- Key**
- Retaining Wall Sections**
- W1
 - W2
 - W3
- Potential Roosting Features (PRFs)

Surveyors: GN and LH
Survey date: 13/08/25
Drawn by: LH
Date: 10/09/2025
Reference: J25-000238 - Sackville College

Contains Google Imagery
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Ltd & Bluesky, Maxar
Technologies, Map data
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Appendices

APPENDIX A – PHOTOGRAPHS

Photo 1: Section of wall denoted W1



Photo 2: Section of wall denoted W2



Photo 3: Section of wall denoted W3



Photo 4: PRF – 1 (W2)

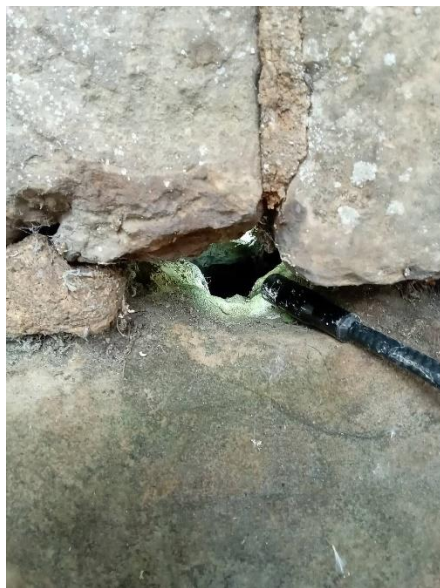


Photo 5: PRF – 2 (W2)



Photo 6: PRF – 3 (W3)



Photo 7: PRF – 4 (W3)



Photo 8: PRF – 5 (W3)



Photo 9: PRF – 6 (W3)

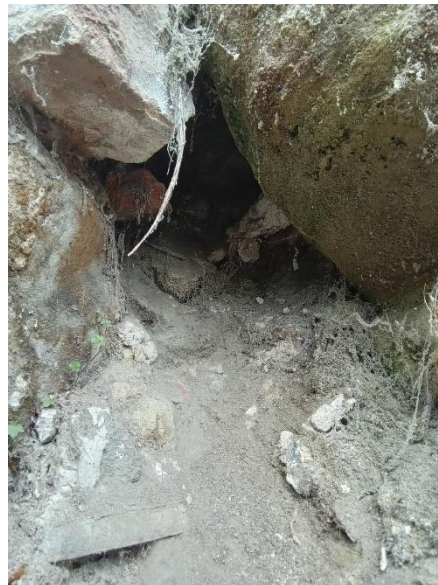


Photo 10: PRF – 7 (W3)