



Bat Mitigation Plan

The Granary at North Hall, Staplefield, West Sussex, RH17 6AS

Unda Consulting Ltd

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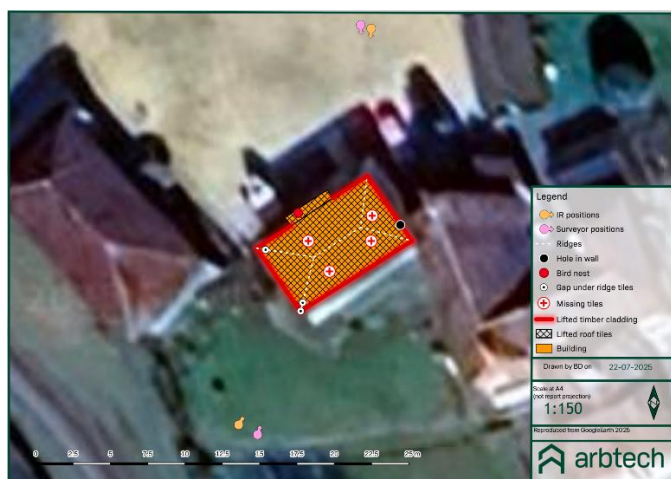
1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was commissioned by Unda Consulting Ltd to prepare a Bat Mitigation Plan for The Granary at North Hall, Staplefield, West Sussex, RH17 6AS to support a planning application for "the conversion of an existing outbuilding to ancillary uses to the main dwelling and for other ancillary works to the building at North Hall Mallions Lane Staplefield".

A preliminary roost assessment (2025) was carried out by Arbtech. The building was assessed as high value to roosting bats, due to the presence of lifted and missing roofing and ridge tiles, lifted timber cladding, gaps in brickwork and mortar pointing, holes present in the walls, and gaps underneath the eaves.

Three bat emergence surveys were conducted (Arbtech, 2025). No bat roosts were identified within the targeted building (B1), however several bat roosts were identified within the surrounding buildings. These include six day roosts for Common pipistrelle, one brown long-eared feeding roost and one brown long-eared occasional/transitional roost. A limitation to the survey is that it was completed outside the maternity season. As such, and given the number of day roosts identified, it is anticipated that a common pipistrelle maternity roost is present within B2.



PRA Plan (Arbtech, 2025)



Site Walkover Plan (Arbtech, 2025)



Bat Emergence Survey Plans (Arbtech, 2025)

Proposed development

The development proposals are for the conversion of an existing outbuilding to ancillary uses to the main dwelling and for other ancillary works to the building at North Hall Mallions Lane Staplefield. The proposals will include roof repairs, replacement of windows and doors, installation of shower room and wood stove with associated flue.

1.2 Development Site location

The site is located at National Grid Reference TQ 27129 27076. The site sits within the North Hall estate, featuring dwellings and barn buildings, with extensive grassland, trees, and arable land. The site sits to the south-west of the small town of Staplefield, with the A23 road running ~0.54km to the west, and Bulstrode Farm lying ~0.9km to the north-west. The surrounding landscape is dominated by arable cropland and woodland copses, extending into the wider landscape. The site sits within the National Character Area of High Weald, characterised by a mosaic of agricultural land, unimproved grasslands, and remnants of heathland interspersed by areas of ancient and semi-natural woodland. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

The following Bat Mitigation Plan has been designed to provide sufficient methodology and precautionary working methods to ensure the risk to bats is reduced to an acceptable level, which should allow the planning authority to grant consent for the scheme with full confidence that mitigation and compensation is achievable within the scheme and that there will be no impact to the favourable conservation status of bats.

2.0 Non-License Bat Mitigation Plan

Table 1: Mitigation, Capital Works and Enhancements

Stage of works	Requirements
Timing of works	The proposed works will be timed to take place when bats are least likely to be present; March/April and October/November. These time periods are outside of bat maternity and hibernation season and so by timing the works this way, the risk to bats is reduced.
Prior to the continuation of works	Bat Box Prior to the works starting, one bat box suitable for common pipistrelles will be erected onto a building or mature tree within the land ownership boundary. This should be mounted between 3-6m above ground level, with clear flight space and away from artificial light. The bat box is only to be used by the ecologist on site if there is an immediate risk to the welfare of a bat and all other options to restore the roost have been exhausted. The onsite ecologist will make the decision to utilise this habitat provision if deemed absolutely necessary. Suitable examples are shown below:



Beaumaris Woodstone Bat Box



Large Multi Chamber WoodStone Bat Box



Low Profile WoodStone Bat Box



Lela Bat Box

Toolbox talk

Prior to the works starting, the contractors will be given a toolbox talk by a suitably qualified ecologist, who will be present for works that impact the suitable bat roosting features. The ecologist will inspect the building prior to the start of work to ensure there are no bats present that could be affected. This will involve a search of the interior and search under any roof tiles and timber cladding due to be impacted, where there are gaps. Scaffolding or an elevating platform may be required to ensure the supervising ecologist has full access to the roof.

During works

ALL WORKS MUST STOP IF A BAT, OR EVIDENCE OF BATS, IS FOUND AND ADVICE SOUGHT FROM A SUITABLY QUALIFIED ECOLOGIST

If a bat is found, a license application will be made to Natural England

During the works, the following requirements will be adhered to:

- There must be no impacts to the surrounding buildings, in particular B2
- Best practice measures will be employed to reduce noise and vibration to an absolute minimum.

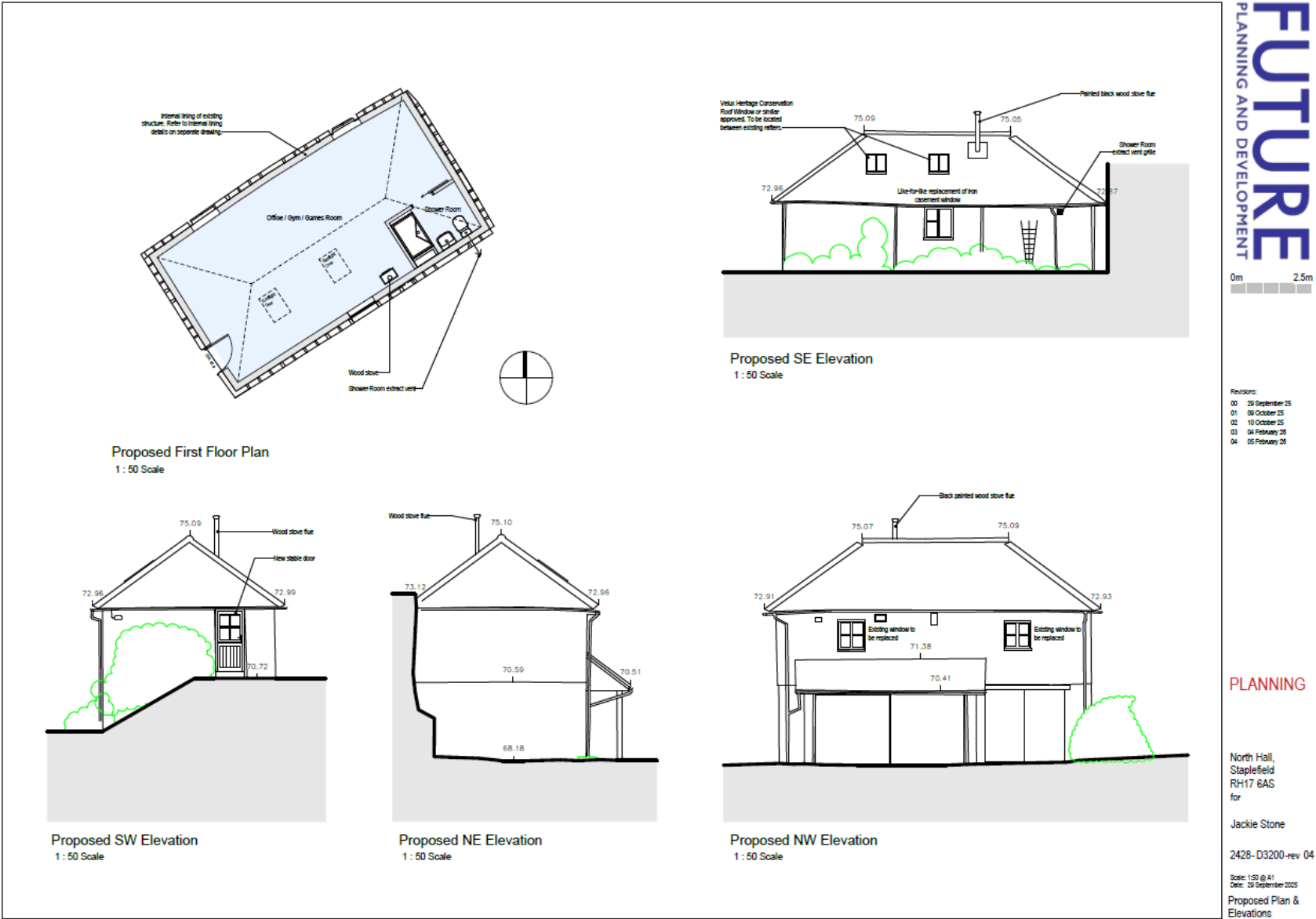
	- Bats often cling to the underside of tiles, lining and timber boards and can easily be missed when removing materials. Double check both sides of the material for the presence of bats before removing or stacking. - If any suitable bat roosting features are required to be removed, they will be removed using hand tools, under the supervision of a suitably qualified ecologist. - Supervision will end when the onsite ecologist has confirmed there is no further risk to roosting bats from the remainder of the development - Follow the lighting strategy, as outlined below 1. There must be no artificial lighting used on site that illuminates any bat boxes. Any new lighting will follow the below guidance: Low impact lighting strategies will be adopted from the guidance outlined in the new Bats and Lighting Publication produced by the Institution of Lighting Professionals and the Bat Conservation Trust "Guidance Note 08/18 Bats and artificial lighting in the UK Bats and the Built Environment series publication: http://www.bats.org.uk/news.php/406/new_guidance_on_bats_and_lighting. The lighting on the site will: Use narrow spectrum light sources to lower the range of species affected by lighting - Use light sources that emit minimal ultra-violet light - Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin. - Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal. - Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvers and shields. Lights will also be directional to ensure that light is directed to the intended areas only. - External lighting will be on PIR sensors that are sensitive to large objects only (so that they are not triggered by passing bats) and will be set to the shortest time duration to reduce the amount of time the lights are on. - Wall lights and security lights will be 'dimmable' and set to the lowest light intensity settings. There are several products on the market that allow the control of the light intensity and the duration that the lights are on. All lighting on the developed site will make use of the most up to date technology available.
Discovery of bats during work	- If a bat, or evidence of bats is discovered, works will stop with immediate effect - Wherever possible, the roost features will be restored so it may continue to be used by bats

Post development

Post development, the lighting strategy outlined in the previous section will need to be followed.

The bat box must be retained and maintained in perpetuity. If any access points become blocked these must be cleared. Any damage must be fixed.

Appendix 1: Proposed plans



Appendix 2: Site location



Appendix 3: Legislation and Planning Policy

LEGAL PROTECTION

All species of bat are fully protected under *The Conservation of Habitats and Species Regulations 2017* through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

- (a) Deliberately captures, injures or kills any wild animal of a European protected species,
- (b) Deliberately disturbs wild animals of any such species,
- (c) Deliberately takes or destroys the eggs of such an animal, or
- (d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals includes in particular any disturbance which is likely—

- (a) To impair their ability:
 - (i) To survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or
- (b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the *Wildlife and Countryside Act 1981 (as amended)* through their inclusion on *Schedule 5*. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY (ENGLAND)

National Planning Policy Framework 2017

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as UK Biodiversity Action Plan priority species) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; opportunities to incorporate biodiversity in and around developments are encouraged; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

Effect on development works:

A European Protected Species Mitigation (EPSM) Licence issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency/success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law.

Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

1. ***include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;***
2. scientific and educational purposes,
3. ringing or marking
4. conserving wild animals

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.