



Date: 29 September 2025

Our ref: 09560

Andrew Watt
Mid Sussex District Council
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/25/0388
Location: Central Sussex College Queensmere House 49 Queens Road East Grinstead West Sussex RH19 1BG
Proposal: Conversion of a D1 Educational Building to 24no. Residential Apartments (32 Bedrooms) with infilling of existing undercroft areas, associated car parking, landscaping, cycle spaces, amenity areas, 1.1m high metal fence and new ramp.

Thank you for re-consulting Place Services on the above application.

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

Summary

We have reviewed the Bat Emergence and Re-Entry Surveys (BERS) (Arbtech Consulting Ltd., August 2025) and Ecological Impact Assessment Scoping Report (Practical Ecology, November 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 have also reviewed the information submitted to demonstrate that Biodiversity Net Gain can be delivered within the timescale promised and to meet any mandatory BNG requirements required. This includes the Biodiversity Net Gain Feasibility Stage Report (Practical Ecology, January 2025), Statutory Biodiversity Metric V2 Feasibility (January 2025) and Statutory Biodiversity Metric V2 Feasibility with Recommendations (January 2025).

We are not satisfied that there is sufficient ecological information available for determination of this application as we recommend that additional information on bats and biodiversity net gain is provided prior to determination. The reasons for this are outlined below:

European Protected Species – Bats:

We note from the Bat Emergence and Re-Entry Surveys (BERS) (Arbtech Consulting Ltd., August 2025) that the hibernation value of Building B1 (four storey brick building and undercover car park) could not be fully assessed during the bat emergence surveys undertaken during June, July and August 2025. Therefore, we support the recommendation that a further survey should be undertaken to assess the building's suitability for hibernating bats between November and March. The results of the surveys for bats, including any mitigation and enhancement measures required to make this proposal acceptable and support a lawful decision, need to be submitted to the LPA prior to determination, in accordance with [Government Standing Advice](#).

The results of these surveys are 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."*

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

Furthermore, the Local Planning Authority, as a competent authority, should have regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) when reaching planning decisions and must not leave this until the licence application stage. Therefore, if a European Protected Species Mitigation Licence is required for this application, appropriate mitigation measures to support the provision of the licence must also be outlined prior to determination to allow certainty to the LPA that a licence will likely be granted.

This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).

Additional comments:

We note from the Bat Emergence and Re-Entry Surveys (BERS) (Arbtech Consulting Ltd., August 2025) that no bats were observed emerging from Building B1 (four storey brick building and undercover car park) during the bat emergence surveys undertaken during June, July and August 2025 and therefore agree that no further emergence surveys for bats are required.

We note that the multi-stemmed Sycamore tree on the northwestern boundary of the site is considered to have Further Assessment Required (FAR) for potential roost features, but the tree is being retained under current plans (Ecological Impact Assessment Scoping Report (Practical Ecology, November 2024)). We understand that no other trees on site have potential roost features for bats and therefore agree that no further surveys for bats and trees are required.

We also note that there are records for Hazel Dormouse in the locality and the site contains small areas of suitable habitat to support this species. Therefore we support the implementation of a non-licensed Precautionary Method Statement for Hazel Dormouse with the outline measures provided in Section 5.7.2 of the Ecological Impact Assessment Scoping Report (Practical Ecology, November 2024)).

We support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Bat Emergence and Re-Entry Surveys (BERS) (Arbtech Consulting Ltd., August 2025) and Ecological Impact Assessment Scoping Report (Practical Ecology, November 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

With regard to mandatory biodiversity net gains, it is highlighted that we support the submitted Biodiversity Net Gain Feasibility Stage Report (Practical Ecology, January 2025) and Statutory Biodiversity Metric V2 Feasibility with Recommendations (January 2025). Biodiversity net gains is a statutory requirement set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990 and we are satisfied that submitted information provides sufficient information at application stage. We note that the Statutory Biodiversity Metric V2 Feasibility with Recommendations (January 2025) results in a net gain in habitat units of 10.70% which agrees with the Biodiversity Net Gain Feasibility Stage Report (Practical Ecology, January 2025) if Section 4.2 Recommendations is followed. As a result, a Biodiversity Gain Plan should be submitted prior to commencement, which also includes the following:

- a) The completed metric calculation tool showing the calculations of the pre-development and post-intervention biodiversity values.
- b) Pre and post development habitat plans.
- c) Legal agreement(s)
- d) Biodiversity Gain Site Register reference numbers (if using off-site units).
- e) Proof of purchase (if buying statutory biodiversity credits at a last resort).

In addition, a Habitat Management and Monitoring Plan (HMMP) should be secured for all significant on-site enhancements. However, we note that the post-intervention values have been provided and that no significant on-site enhancements are proposed in the proposals. As a result, we are satisfied that HMMP is not likely to be required by legal obligation or a condition of any consent for a period of up to 30 years.

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 separate Biodiversity Enhancement Layout and 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](#).

We look forward to working with the LPA and the applicant to receive the additional information required to support a lawful decision and overcome our holding objection.

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

Yours sincerely,

Hamish Jackson ACIEEM BSc (Hons)
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 Place Services at Essex County Council

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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.

