PHILLIPS ECOLOGY

PRELIMINARY BAT ROOST ASSESSMENT

THE STABLES AT PLUMMERDEN HOUSE, PARK LANE, LINDFIELD, SUSSEX, RH16 2QS

DRAFT REPORT

February 2025

Report conditions

Report title	Preliminary Bat Roost Assessment – Stable Block at Plummerden House, Park Lane, Lindfield, Sussex, RH16 2QS.	
Client	DS Equine	
Report status	Draft	
Survey date	26th September 2024	
Written by	Laura Baynes	*Date* 19/02/2025
Reviewed by	Izabel Phillips	*Date* 27/02/2025

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Executive Summary

- This preliminary roost assessment report has been prepared in order to support a planning application for the demolition of the stable block and the construction of a single-storey ancillary building at Plummerden House.
- A preliminary roost assessment survey was undertaken on the 26th September 2024.
- The preliminary roost assessment has identified that the stable block does not support any features suitable for roosting bats.
- Overall, the stable block is considered to support negligible suitability for roosting bats.
- As a result, there is considered to be no reasonable likelihood that bats will be present and affected by the proposed demolition and construction works.
- Information regarding the length of time the findings of this report are valid for can be found in section 5.1.
- Provided the recommendations set out in section 5 are followed, the planning authority can be confident that the development would accord with relevant planning policy, legislation and caselaw.

Contents

1. Introduction

1.1 Report purpose

This report presents the findings of the preliminary bat roost assessment undertaken of the stable block at Plummerden House, Park Lane, Lindfield, Sussex, RH16 2QS (central grid reference: TQ36032681).

1.2 Description of proposal

The current proposal is the demolition of the current stable block and the construction of an ancillary building.

1.3 Report context

DS Equine have prepared a planning application on behalf of their client for the demolition and construction works on the stable block at Plummerden House. Phillips Ecology have been instructed by the Applicant to undertake an ecological assessment to support this application, which has been submitted to Mid Sussex District Council.

1.4 Survey area

The survey area comprised the existing stable block and its immediate surroundings.

1.5 Limitations

No limitations were encountered during the survey's completion.

1.6 Relevant documents

The relevant proposal plan used to inform this assessment is presented in Appendix 1.

2. Survey Methodology

2.1 Surveyor/s

The survey was carried out by Izabel Phillips of Phillips Ecology.

2.2 Survey area

The survey area extended to all areas of the stable block that will be modified by the proposed works in such a way that bats, or their roosts could be impacted (directly or indirectly). Therefore, the survey area included the entirety of the stable block at Plummerden House.

2.3 Survey date

The survey was carried out during the daytime on the 26th September 2024.

2.4 Survey description

The survey did not depart from the Bat Conservation Trust's (BCT) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition) which states that "A preliminary roost inspection survey is a detailed inspection of the exterior and interior of a structure to look for features that bats could use for entry/exit and roosting and to search for signs of bats".

The external features of the structures which will be modified by the proposed works in such a way that bats or their roosts could be impacted (directly or indirectly) if present, were systematically inspected in detail to compile information on potential and actual bat access points and roosting places such as lifted or broken roof materials, loose brickwork and open eaves. This included a thorough search for evidence of bat activity such as bat droppings, urine splashes and fur staining.

The interior of the building was inspected in order to identify potential or actual access points and roosting places and to record any evidence of bat activity or bats themselves.

2.5 Survey equipment

Survey equipment comprised:

- High-powered torch
- Camera
- Ladders
- Binoculars

2.6 Weather conditions

Weather during the survey can be described as: dry, 50% cloud cover, light breeze and 13°C. The weather conditions did not hinder the ecologist's ability to carry out the survey effectively.

2.7 Data search

A desk-based assessment was undertaken by Phillips Ecology on the 19th February 2025 with Multi-Agency Geographic Information for the Countryside (MAGIC). The MAGIC database was consulted for records of bat licences granted within a 1km radius.

2.8 Assessment methodology

The suitability of the building for supporting bat roosts will be assessed against the guidelines within Table 1 which have been adapted from the BCT Good Practice Guidelines.

Table 1 *Suitability assessment guidelines*

Suitability	***Description of Roosting Habitats***
Negligible	Structure has no reasonable likelihood of supporting roosting bats i.e. no suitable roosting features present.
Low	A structure which could be used opportunistically by individual bats i.e. one or more potential roost sites which do not provide sufficient space, shelter, protection, appropriate conditions (e.g. temperature, light, humidity) and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats.
Moderate	A structure which could be used by bats but is not likely to support a roost of high conservation status (e.g. maternity roost). This structure would support features which exhibit suitable size, shelter, protection, conditions and surrounding habitat for roosting bats.
High	A structure which is obviously suitable for supporting larger numbers of bats, on a regular basis and for longer periods of time.

3. Survey results

3.1 General site overview

The site comprises the stable block at Plummerden House, which is located within the village of Lindfield which is situated to the northeast of Haywards Health. The site comprises the stable block and associated hardstanding.

3.2 Existing information

The data search revealed three records for European Protected Species (EPS) Mitigation licences or EPS survey licence returns relating to bats within a 1km radius of the site. These are as follows:

> Bat: Common pipistrelle *Pipistrellus pipistrellus* and Brown Long-eared bat *Plectus auritus* (2015-10798-EPS-MIT) 2015 – 445m S
>
> Bat: Common pipistrelle and Brown Long-eared bat (2015-10798-EPS-MIT-1) 2015 – 445m S
>
> Bat: Common pipistrelle, Soprano pipistrelle *Pipistrellus pgymaeus* and Brown Long-eared bat (2015-10798-EPS-MIT) 2015 – 445m S

3.3 Building description relevant to bats and their roosts

3.3.1 The stables

The building comprises a single-storey wooden built stable block on a brick plinth, which includes seven boxes in an east facing U-shape. The stable block rises to a slate tiled pitched and gable roof with hipped roofs at the corners. All elevations are clad in wooden weather boarding.

The seven boxes each have a wooden stable style door set in wooden frames. There is a clock tower with a lead flashing pavilion roof, this is located along the central ridge line of the western section of the building.

The roof extends beyond its respective wall plates and the eaves are enclosed in wooden, fascia and underboards, with wooden bargeboards on the gable ends, with adjoining uPVC guttering. There is also motion activated exterior lighting.

Internally, the stable block is open with no roof separate roof void. The roof is unlined and uninsulated. The stables are frequently used and cleaned in order to house horses.

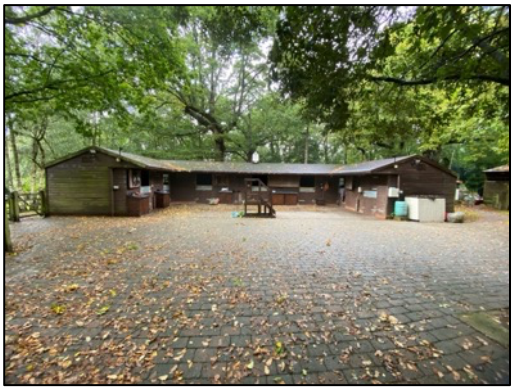

Figure 1 – Eastern view of the stable block.

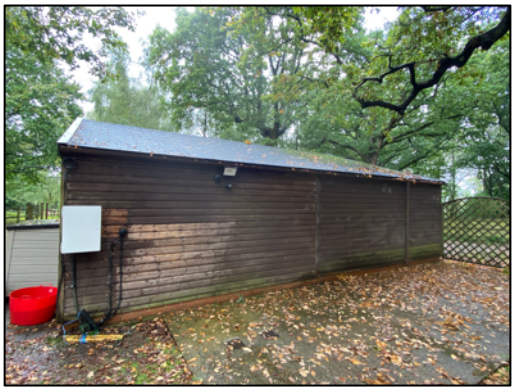

Figure 2 – Northern elevation of the stable block

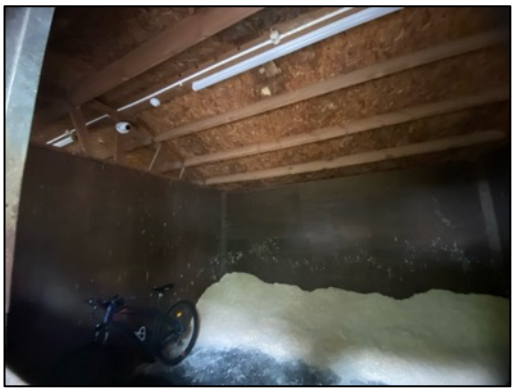

Figure 3 – Interior of the stable block.

An account of suitable access/egress features and recorded evidence of bat activity is given in table 2.

Table 2 *– Recorded features and activity*

	Suitability	***Evidence***
Interior	No suitable access/egress and roosting features were recorded internally during the survey.	No evidence of roosting activity was recorded internally during the survey.
Exterior	No suitable access/egress and roosting features were recorded externally during the survey.	No evidence of roosting activity was recorded externally during the survey.

3.4 Site grounds

The immediate surroundings of the stable block consist of hardstanding areas, bordered by deciduous woodland and in proximity to ancient woodland. The wider landscape is characterized by scattered residential properties with associated gardens, arable farmland, permanent pasture, and additional woodland areas.

The site is located within the High Weald Area of Outstanding Natural Beauty (AONB). While the habitats within the footprint of the proposal provide some suitability for commuting and foraging bats, they are considered to be of low value for foraging bats.

3.5 Other protected species

3.5.1 Breeding birds

During the course of the survey no evidence of breeding birds was noted.

4. Discussion and Assessment of Impacts

4.1 Preliminary assessment of suitability and potential impacts

When considered in view of the criteria set out in Table 1, the stable block is considered to support negligible roost suitability - i.e. the structure has no reasonable likelihood of supporting roosting bats.

On the basis that the stable block is considered to support negligible suitability for roosting bats, there is considered to be no reasonable likelihood of impacts on bats associated with the proposed demolition and construction works.

Though the site itself is considered to support low suitability for foraging and commuting bats, its immediate surrounds do support suitable features. Therefore, increasing light spill on surrounding habitats could impact foraging and commuting bats.

4.2 Relevant legislation and policy

Circular 06/2005 identifies that applicants should not be required to provide information on protected species unless there is a reasonable likelihood that they will be present and affected by the proposed development. The site is considered to support habitats with suitability and potential for protected species and these may be affected by the proposed development. Therefore, the proposal triggers 'reasonable likelihood' under the Circular.

The Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (commonly referred to as the Habitats Regulations) may apply should protected species be confirmed on site.

In the case that a European protected species is found to be present and impacted by the proposal, the local planning authority will be required to engage with the Habitat Regulations. Permission will be granted unless:

a) the development is likely to result in a breach of the Habitats Regulations, and

b) is unlikely to be granted an EPS licence from Natural England to allow the development to proceed under a derogation from the law (under licence).

When considering whether Natural England would not be unlikely to grant a licence for the identified impact, the local planning authority must consider the three tests which are set out in the Habitat Regulations:

1. the consented operation must be for 'preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment'; (Regulation 53(2)(e))

2. there must be 'no satisfactory alternative' (Regulation 53(9)(a)); and

3. the action authorised 'will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range' (Regulation 53(9)(b)).

Case-law (Morge vs. Hampshire County Council) has clarified that planning authorities are able to grant permission for developments that would cause a breach of the Regulations is likely (i.e. in the case of this proposal, destruction of a bat roost), provided that sufficient information is provided to give the planning authority assurance that the relevant EPSM licence is not unlikely to be granted - i.e. planning authorities also have a duty to assess planning applications against these tests.

5. Recommendations

5.1 Requirement for further surveys

Where there is a reasonable likelihood that a protected species will be present and impacted by the proposed development, planning authorities require further surveys to properly assess development proposals against relevant planning policy. An assessment into the requirement for further surveys is presented below, however in summary, no further surveys are considered necessary.

It is important that planning decisions are informed by current ecological survey data. Due to this, there is a limited time frame that phase 1 surveys are valid before becoming outdated. This time frame can vary depending on any changes in project circumstances or plans but it is generally considered that phase 1 ecological surveys are valid for a period of 18 months (CIEEM, 2019). Projects that take place over longer periods than 18 months might be required to carry out further ecological surveys to ensure planning authorities have the necessary up-to-date information to make well informed, evidence-based decisions.

5.1.1 *Bats*

Given that the stables are considered to support negligible suitability for roosting bats, no further survey work in respect of bats is considered necessary.

5.1.2 *Breeding birds*

Subject to the precautionary mitigation measures set out in Section 5.2.2, no further surveys are considered necessary.

5.2 Mitigation strategy

5.2.1 *Bats*

In order to limit any effects on foraging and commuting bats, external lighting should be limited to only that which is absolutely necessary for safety purposes, both during the construction phase and once the proposals are complete. The following lighting measures are required:

- Construction works between March and October should be undertaken during daylight hours only to avoid disturbance to bats that may forage and commute through or near the site.
- Lighting to the completed development should be as low brightness as possible, kept at a low level and directed away from all boundaries. Lighting on sensors should not be so sensitive that foraging bats trigger them.

All lighting must follow the Bat Conservation Trusts and Institute of Lighting Professionals guidance on bats and artificial lighting (BCT, 2023).

5.2.2 *Breeding birds*

Care should be taken that the development does not disturb breeding birds. The bird nesting season is taken to be March to August inclusive. Any removal of suitable nest

habitat such as ornamental shrubbery will either need to be undertaken outside of this period or else checked to ensure that no nesting birds are present. If occupied nests are present, then the nest must not be removed and works around the nest can only recommence once the nest becomes unoccupied of its own accord.

5.3 Enhancements

The delivery of biodiversity enhancement on development sites is promoted by the National Planning Policy Framework (NPPF), Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006.

Where opportunities exist it is best practice to provide enhancement features which encourage greater biodiversity within development sites in accordance with the NPPF and the Local Planning Authority's responsibilities under the NERC Act.

Opportunities for enhancement which are proportionate to the scale of the development include:

- The provision of new bat roosting opportunities, in addition to those that may be required as mitigation, in the form two bat boxes. These should be installed as high as possible, at least 3m above ground on the new house extensions or nearby trees.
- The provision of bird nesting opportunities in the form of two open fronted boxes installed at least 2m above ground within a sheltered position within the garden or on the new build.

6. Conclusion

The preliminary roost assessment has confirmed that the stable block at Plummerden House supports negligible suitability for roosting bats. As such, no adverse impacts on bats or their roosts are anticipated. Opportunities for ecological enhancement have been suggested for the site.

7. References

- **Altringham J D, 2003**, British Bats, Collins New Naturalist
- **Bat Conservation Trust, 2016**, BCT Bat Survey Guidelines Third edition
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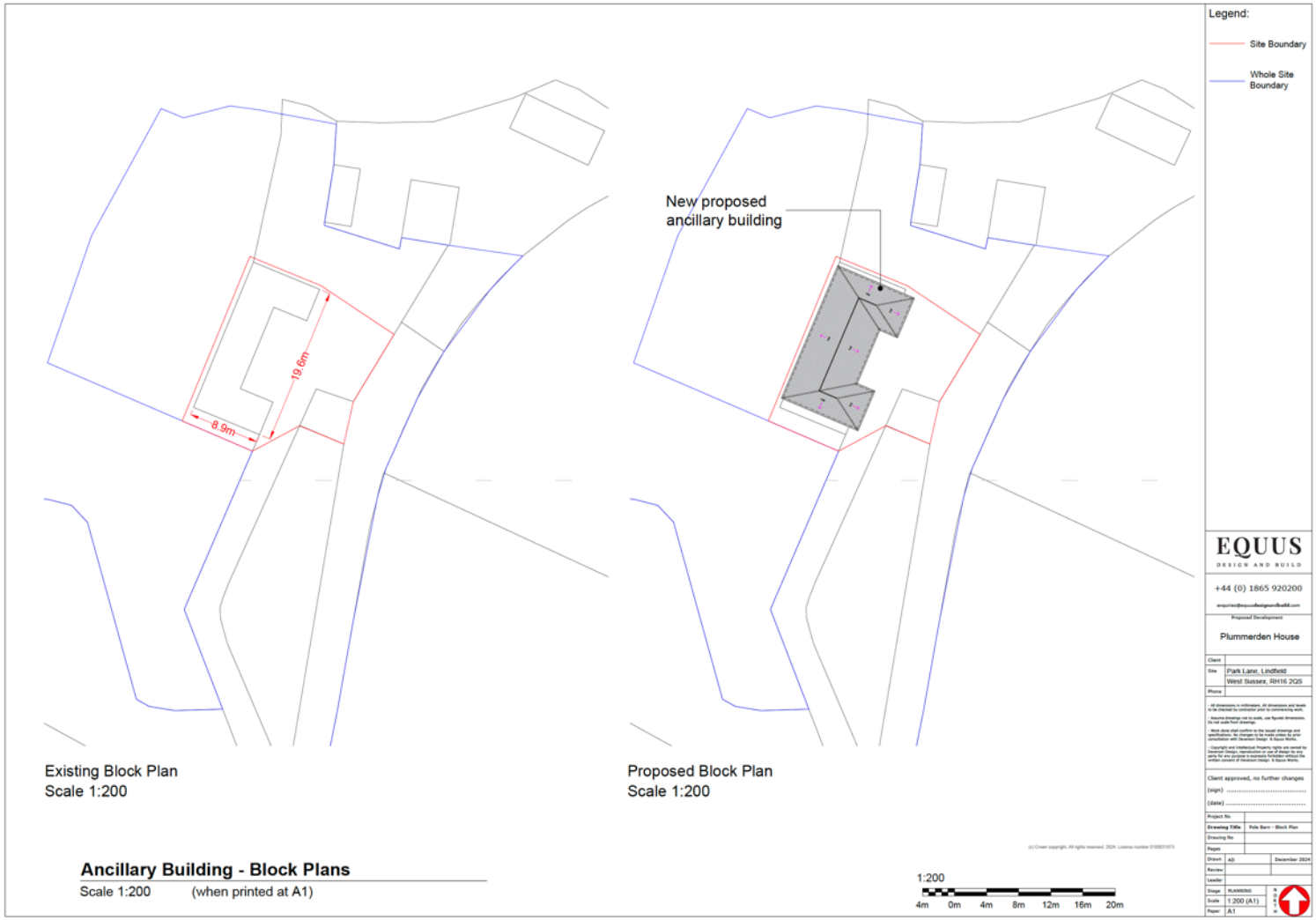
- **Chartered Institute of Ecology and Environmental Management,** 2017, *Guidelines for Preliminary Ecological Appraisa*l. CIEEM, Winchester
- **Chartered Institute of Ecology and Environmental Management,** 2019, *On the lifespan of ecological reports & surveys*. CIEEM, Winchester
- **ILP and BCT, 2018** *Bats and Artificial Lighting in the UK: Guidance Note 08/18.* ILP, Warwickshire.
- **MHCLG**, 2018. *National Planning Policy Framework*. Ministry of Housing, Communities and Local Government; London.
- **Mitchell Jones AJ, 2004**, *Bat Mitigation guidelines,* English Nature
- **Mitchell Jones AJ and McLeish A P**, *The Bat Workers Manual,* JNCC
- ***Natural Environment and Rural Communities Act*** 2006, Ch 3, s. 40
- **Natural England, 2011** Frequently asked wildlife questions: Bats. Natural England.
- **Reason, P.F. and Wray, S, 2023**, UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1. Chartered Institute of Ecology and Environmental Management, Ampfield.

Appendix 1 – Proposal plan



PHILLIPS ECOLOGY

07760 208562

info@phillipsecology.co.uk

www.phillipsecology.co.uk

Hampshire office:
Clifton Cottage
Bucks Head Hill
Meonstoke
Hampshire
SO323NA