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REPEAT BAT SURVEY REPORT - APRIL 2026

Site: 11 Manor Drive
Whitemans Green
Cuckfield
Haywards Heath
West Sussex, RH17 5BT

Client: Mr J Lurie
11 Manor Drive
Whitemans Green
Cuckfield
Haywards Heath
West Sussex, RH17 5BT

Surveyors: P King MEECW - NE CL18 Bat Class Svy. Lic. No. 2025-85092-CL18-BAT
NE Reg. Bat Consultant No. RC182
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Survey Dates: 2nd April 2026

Report Date: 3rd April 2026

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Repeat Phase 1 Bat Survey of 11 Manor Drive, Whitemans Green, Cuckfield, Haywards Heath, West Sussex, RH17 5BT - OS Grid reference: TQ 30264 25371

Executive Summary

Two surveyors from Batscan Ltd returned to 11 Manor Drive, Whitemans Green, in Cuckfield, West Sussex, on 2nd April 2026, to undertake a repeat Phase 1 bat survey (daytime building inspection) of the property. The owners are proposing to demolish and replace the existing, detached, single-storey dwelling, which dates from the mid-20th Century.

This survey followed an initial combined Phase 1 & Phase 2 survey of the bungalow, undertaken in September 2019, repeated in July 2020 and again in May 2024. The 2019 and 2020 surveys were undertaken on behalf of former owners of the property, who were seeking planning consent to demolish and replace the existing 1970s building. During the 2019 survey, a single common pipistrelle (*Pipistrellus pipistrellus*) was seen roosting in a crevice beneath a vertical tile on the south facing wall of the property. Apart from the small sections of tile-hanging, the building offered few other bat roosting opportunities, at that time. The pipistrelle was later recorded emerging from its roosting place.

Following the 2019 survey, it was advised that because the property was used as a day roost by at least one bat, a Natural England Bat Mitigation Licence would be required to allow the proposed redevelopment to go ahead and that additional surveys would be necessary. However, during the second survey, in 2020, it was discovered that gaps beneath the hanging tiles on the south side of the property had been sealed. The (previous) owner suggested that this had been undertaken for safety reasons. No bats were seen in the few remaining gaps beneath the hanging tiles and no bats emerged during the dusk emergence check. The owner was reminded of the law protecting bats and their roosts and advised that a Bat Mitigation Class Licence (Low Impact Licence) would, nevertheless, be required, as the building had been confirmed as a roost, a few months previously and it was considered *possible* that a bat or bats might return. Planning consent for the demolition and replacement was subsequently granted but the property was sold to new owners, prior to any works taking place.

Both the latest survey and the 2024 survey were carried out on behalf of new owners of the property, who are proposing to replace the existing building with a new family home and are seeking changes to the original planning consent.

The small, tile-hung sections were carefully inspected with powerful torches and no bats were seen, although a very few small gaps, suitable for bat use, remain. No bat droppings or other evidence of bat use was found. A check was made of the remainder of the building and a small number of features offering bat access opportunities were noted. However, no evidence of bat use was found and it was concluded that the potential for bat use remains virtually negligible.

Therefore, no further surveys should be required and a Mitigation Licence will no longer be necessary to allow the demolition of the building. However, a precautionary approach should be taken, during the demolition and it is also strongly recommended that provisions for bats to roost are built into the replacement dwelling. Further advice is offered, in this report.

1. Introduction & Background

- 1.1 Two surveyors from Batscan Ltd returned to 11 Manor Drive, Whitemans Green, in Cuckfield, West Sussex, on 2nd April 2026, to undertake a repeat Phase 1 bat survey (daytime building inspection) of the property. Both surveyors hold Natural England Scientific Bat Licences and one is a registered bat consultant. For details of licences and affiliations, please see this report cover.
- 1.2 The bungalow is situated amongst other detached, residential properties of mixed age and design, on the western edge of Whitemans Green, with excellent connectivity to woodland and water bodies and extensive views of the South Downs. The surrounding habitat is considered to be ideal for bat use. The mid-century building is of a rather complex design with both flat and angled roofs and no internal roof voids. It is set in a very large, mature garden.
- 1.3 This survey followed an initial combined Phase 1 & Phase 2 survey (dusk emergence check/bat activity survey) of the bungalow, undertaken in September 2019, repeated in July 2020 and again in May 2024. The 2019 and 2020 surveys were undertaken on behalf of former owners of the property, who were seeking planning consent to demolish and replace the existing 1970s building. During the 2019 survey, a single common pipistrelle (*Pipistrellus pipistrellus*) was seen roosting in a crevice beneath a vertical tile, on the south facing wall of the property. Apart from the small sections of tile-hanging, the building appeared to offer few other bat roosting opportunities, at that time. The pipistrelle was later recorded emerging from its roosting place.
- 1.4 Following the 2019 survey, it was advised that because the property was used as a day roost by at least one bat, a Natural England Bat Mitigation Licence would be required to allow the proposed redevelopment to go ahead and that additional surveys would be necessary. However, during the July 2020 survey, it was discovered that gaps beneath the hanging tiles on the south side of the property, had been filled with a silicone sealant. The owner explained that this had been undertaken for safety reasons, after strong winds caused some slippage of tiles. No bats were seen in the few remaining gaps beneath the hanging tiles and no bats emerged during the dusk emergence check. The owner was reminded of the law protecting bats and their roosts and advised that a Bat Mitigation Class Licence (Low Impact Licence) would, nevertheless, be required, as the building had been confirmed as a roost, only a few months previously and it was considered *possible* that a bat or bats might return. Planning consent for the demolition and replacement was subsequently granted but the property was sold to new owners, prior to any works taking place.
- 1.5 The latest survey, as well as the 2024 surveys, were carried out on behalf of new owners of the property, who also proposing to replace the existing building with a new family home, more suited to their requirements and are seeking changes to the original planning consent. (See previous Batscan Bat Survey reports; 2019, 2020 & 2024, for further details).
- 1.6 By early April, bats are becoming more active, following their winter hibernation period. However, activity is highly dependent on weather conditions and bats may not yet have returned to their summer roosts. Therefore, only a daytime building inspection was conducted, checking for roosting/hibernating bats, evidence of bat activity and the potential for bat use.

- 1.7 Recommendations from the Bat Conservation Trust's 'Bat Surveys for Professional Ecologists: Good Practice Guidelines' (4th edn)*¹ were followed for the course of this survey.

2. Repeat Phase 1 Survey (Building Inspection) – 2nd April 2026 – Methodology

- 2.1 Prior to the survey, the previous bat survey reports for the site were reviewed. A search of the MAGIC (Multi Agency Geographic Information for the Countryside) website, provided by DEFRA and managed by Natural England, was carried out, to establish whether any European Protected Species Licences, with regard to bats, had been granted in the surrounding area (See MAGIC Maps, below and please note that these do not include 'low impact' or Bat Mitigation Class Licences). Additionally, aerial maps were studied to establish the extent of connectivity between the property and likely foraging areas.
- 2.2 The surveyors inspected the exterior of the bungalow, searching for any evidence of bat use, such as bat droppings on walls, windows, sills or on the ground below well-used roost entrances. Powerful torches were used to inspect any crevices beneath hanging tiles, particularly on the south side, where the bat was seen roosting, in September 2019. A ladder was used to access a gap in the UPVC fascia at the front (N side) of the building, where a panel had recently been dislodged by strong winds. Torches were used to inspect the cavity, as well as a gap where a small section of fascia board had come loose, on the west side. Binoculars were used to view features at a higher level. See photographs, below.
- 2.3 The interior of the building was not inspected, as there are no internal voids that might be used by bats.
- 2.4 The detached garage, at the NW of the bungalow, was also checked for evidence of bat use and the potential for bat use.
- 2.5 Photographs were taken and detailed notes were made.

3. Repeat Phase 1 Survey (Building Inspection) – 2nd April 2026 – Results

3.1 The House

- 3.1.1 No bats were seen beneath hanging tiles during the latest survey. The majority of gaps beneath the hanging tiles, in the former roosting area, remain filled with silicone sealant. Only one or two crevices remain beneath tiles on the south side, leaving extremely limited potential for bat use. No bats or evidence of current bat use was seen.
- 3.1.2 A small number of additional features offering bat roosting opportunities were noted; one where a UPVC panel at the rear of the building had, very recently, been dislodged by heavy winds, a second where a small section of UPVC fascia board had slipped, on the west side and another beneath slightly lifted lead flashing around the chimney. However, no bats or evidence of bat use was seen, when these areas were inspected and it was concluded that the potential for bat use, of this building, is *virtually* negligible.

3.2 The Garage

No bats, evidence of bats or significant potential for bat use was noted in or around the detached, flat-roofed garage.



Fig. 1 – Rear (south side) of existing house, viewed from lawn



Fig. 2 – W side of house



Fig. 3. The house viewed from the SW



Fig. 4 – Front (N) view of house, showing missing UPVC fascia board



Fig. 5 – Shallow void behind recently lost fascia board, N side



Fig. 6 – Small gaps between vertical tiles, S side, sealed with silicon by previous owner

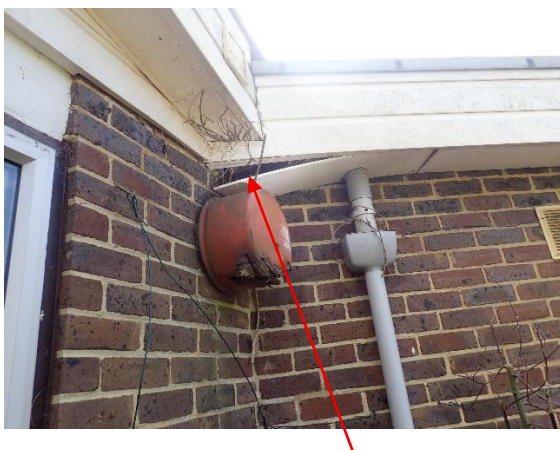


Fig. 7 – Damaged section of UPVC soffit, W side



Fig. 8 - Small gaps beneath lead flashing, S side



Fig. 9 – Garage to NW of house



Fig. 10 – Interior view of garage



Fig. 11 – View via driveway to road, front (N) side of property



Fig. 12 – View to south from rear of house

4. Survey Constraints

- 4.1 This survey was conducted in early spring, when bats are beginning to become active, following their winter hibernation period. Any bat droppings which *might* have been stuck to walls, windows, etc., from the previous season's use, may have been washed away by rain or wind, during the winter period. A careful search was made of accessible cavities, although the chimney flashing could only be viewed from ground level, using binoculars. Overall, there were not considered to be any significant constraints to the latest survey.

5. Conclusions and Recommendations

- 5.1 **No bats, bat droppings or other evidence of bat use were seen during the latest building inspection.**
- 5.2 **It is therefore concluded that the building is no longer used as a bat roost. No further surveys will be necessary and a Bat Mitigation Licence will not be required.** However, as a precaution, the hanging tiles on the south side of the property, where a bat previously roosted, should be removed by hand, with appropriate care. It is also advised that care should be taken when the fascia boards and chimney flashing are removed. A written copy of a 'toolbox talk' in respect of bats, is included with this report. This gives advice on signs of bats to look out for and on what to do, should a bat or evidence of bats, be found.
- 5.3 It is also strongly recommended that provisions for bats to roost are fitted into the replacement dwelling house. These should be agreed at an early stage in the planning process. The most appropriate way to ensure that bat roosts are provided for the future, would be to fit purpose-made roosting units into new walls. Suitable positions for bat roosting units are indicated on the plan, below. Alternatively or additionally, purpose-made bat access tiles can be fitted to new roofs. See links, below. Please note that 1F felt (or an appropriately certified 'bat-safe' membrane) must be used below tiles or cladding, where bat tiles are fitted, as woven, breathable membranes (BRMS) can be hazardous to bats.



 Suitable positions for integral bat boxes on proposed new dwelling

Fig. 13 – Architectural drawing, indicating suitable positions for integral bat boxes

- *1 Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edn). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6
- *2 Examples of bat roosting provisions – other makes and styles are available commercially.

[Bat Access Tiles & Ridges | Tudor Handmade Roof Tiles, UK \(tudorrooftiles.co.uk\)](https://tudorrooftiles.co.uk)



[Integrated Eco Bat Box \(NB\) | Wildlife Services](#)

[Bat Access Tiles & Ridges | Tudor Handmade Roof Tiles, UK \(tudorrooftiles.co.uk\)](https://tudorrooftiles.co.uk)

*** Nesting Birds - No evidence of nesting birds was seen during this survey, but please note that missing or damaged sections of UPVC should be replaced, asap, to avoid the risk of nesting birds being affected by the proposed works. Nesting birds are protected by law.**

MAGIC Maps

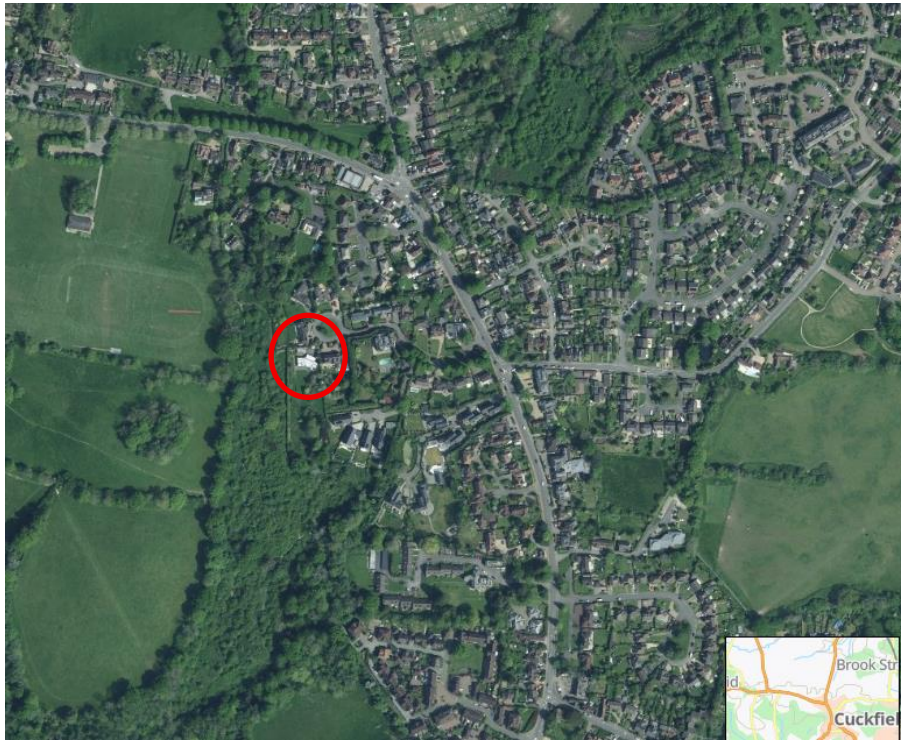


Fig. 14 – The property, circled

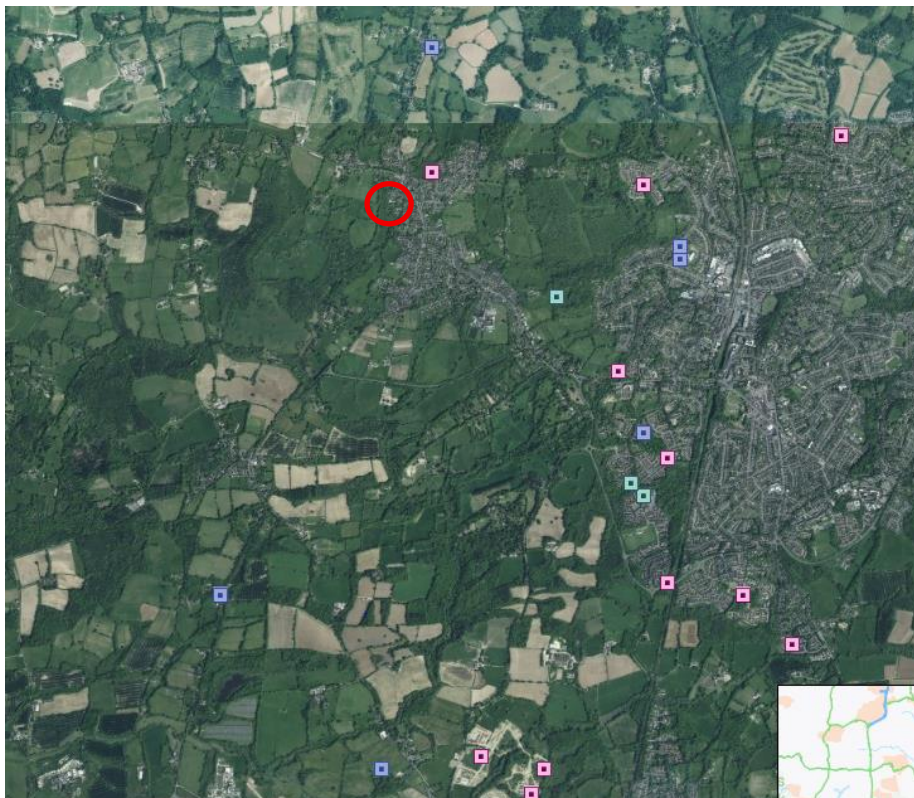


Fig. 15 – The property circled. Purple squares indicated sites where NE bat mitigation licences have been granted previously

Overview of the law relating to bats – England and Wales (should not be relied on in place of professional legal advice.) - Updated January 2024 with advice from the 4th edition of the Bat Conservation Trust's 'Bat Surveys for Professional Ecologists – Good Practice Guidelines'.*¹

Legal Protection

All bat species and their roosts in England and Wales are protected under The Conservation of Habitats and Species Regulations 2017 (as amended). Annex II of the Council Directive 92/43/EEC 1992, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), lists species of Community interest, for which conservation requires the designation of Special Areas of Conservation (SACs), as part of the Natura 2000 network. (now referred to, in the UK, as 'the National Site Network', following Brexit). Annex IV lists species of Community interest in need of strict protection. This protection means that they are also a relevant consideration in a Habitats Regulations Assessment (HRA). All bat species are listed in Annex IV and some are listed in Annex II (greater horseshoe bat (*Rhinolophus ferrumequinem*), lesser horseshoe bat (*Rhinolophus hipposideros*), barbastelle (*Barbastella barbastellus*) and Bechstein's bat (*Myotis bechsteinii*)).

The EC Habitats Directive was transposed into UK law and the regulations implementing the Directive in the Conservation of Habitats Regs. 2017 (as amended) in England and Wales. The regulations are generally referred to as the Habitats Regulations. When the UK left the European Union in January 2020, although no longer bound by European legislation, the related domestic legislation was retained, so that bats receive the same level of protection as previously. The European Commission published an updated version of their Guidance document (EC 2021) and this remains a relevant source of information.

All species of bats found in the wild in the UK are, therefore, European Protected Species (EPS) and it is unlawful to kill, injure, capture or take a wild bat. It is also unlawful to disturb bats, particularly if the level of disturbance can be shown to impair their ability to survive, to breed or reproduce, to rear young, to hibernate or migrate and also to significantly affect local distribution or abundance. In England and Wales, this offence requires a deliberate action. Throughout the UK, it is illegal to damage or destroy a place used by a bat for breeding or resting. This offence is unique in that it is a strict liability offence which can be committed accidentally; no element of intentional, reckless or deliberate action needs to be evidenced. Under the Habitats Regulations, it is an offence to be in possession of a wild bat, alive or dead, or any part of a bat; to sell, transport or exchange a bat.

It is also illegal in England and Wales, under the **Wildlife and Countryside Act 1981 (as amended)** to intentionally or recklessly disturb a bat, whilst it is occupying a place of shelter or protection. In England and Wales, it is an offence under the W&C Act to intentionally or recklessly obstruct access to any place used by a bat for shelter or protection. As with intentional or reckless disturbance, **The Environment Act, 2021** introduces a new exception to the W&C Act offences for any actions taken under the auspices of a Habitats Regulations Licence. A further change, made in 2022, allows licences to be issued (in England) for reasons of overriding public interest, providing there is no other satisfactory solution and that the activities licensed will not be detrimental to the survival of the species concerned. This provision relates to development works. Actions, which would otherwise be illegal, can be made lawful, if licensed by the appropriate licensing body (Natural England (NE) in England). It is an offence to make a false statement in order to obtain a bat licence or to fail to comply with licence conditions.

A householder who disturbs a bat in its place of protection in a dwelling house, or obstructs access to this place of protection, does not commit an offence if they first seek and advice from Natural England and allow time for such advice to be provided. However, if the bat is within the living space of a dwelling, it is not considered to be an offence to disturb it. It is not illegal to take a disabled bat, for the sole purpose of tending it and releasing it

when appropriate, providing the person can show that it was not harmed deliberately by them. It is also not illegal to kill a bat (unless harmed by their own unlawful act), if there is no reasonable chance of it recovering. These defences only apply where there is no reasonable alternative and when the act will not be detrimental to the Favourable Conservation Status of the species, in its natural range.

Across the UK, Sites of Special Scientific Interest (SSSIs) have been identified by the Statutory Nature Conservation Bodies, including some notified for their bat interest. The relevant legislation is the W&C Act. This provides additional protection for bats and their roosts, in these sites.

The police have the power to stop and search a person who is suspected of committing a bat related offence, enter property (other than a dwelling house) without a warrant, or enter a dwelling house with a warrant. They are empowered to take with them any person or equipment required to exercise these powers.

Those found guilty of offences relating to bats can face unlimited fines in England and Wales, and/or be sentenced to six months imprisonment. Any profit arising from this criminal activity can be confiscated.

The Environmental Damage (Prevention and Remediation) (England) Regulations 2015 aim to prevent damage to the environment, including protected species, such as bats. The regulations require the operator to take all practicable steps to prevent environmental damage and give enforcing authorities the power to serve notice and specify action required to prevent environmental damage. Remediation orders can be imposed to repair any damage which has occurred. This can be used alongside a prosecution under the Habitats Regs., to gain better outcomes.

Licensing

The two main types of relevant licence are **EPS survey licences** and **EPS mitigation licences**:

Survey Licences are granted in England by Natural England and are issued to ecologists, under the Habitats Regs and the W&C Act, to permit them to undertake activities that would otherwise be illegal – i.e. entering bat roosts and disturbing bats. The ecologist is required to be suitably qualified and experienced under British Standard BS42020. Different activities (ie, certain projects and methodologies) are licenced under separate licences. Photographing bats is only permitted under a survey licence when it is 'an incidental part of other licensed bat work'. Where disturbing bats is proposed for the sole purpose of photography, this must be specifically licensed.

Conservation Licences are issued where improvements are made to a bat roost for the specific aim of conserving the species.

Class Licences for surveying bats in England cover all bat-related activity, outside of the NE volunteer bat roost visitor advice service, including bat box checks, hibernation surveys, general surveys and limited use of

equipment such as harp traps etc. There are four levels of licence, allowing for different bat-related activities (both voluntary and professional): **Level 1** (to survey bats by observation only, not including hibernating bats – WML-CL17, **Level 2** (to survey bats using artificial light, inc. hibernating bats, use of hand-held and static nets – WML-CL18, **Level 3** (to survey bats, including previous methods and additionally to use mist nets and acoustic lures (WML-CL19) and **Level 4**, as previous licences but including the use of harp traps.

European Protected Species (EPS) licences (derogation, mitigation or development licences) are issued under the Habitats Regs., by NE in England, after three tests have been satisfied in relation to the proposed action:

The proposed action must be for the purpose of preserving public health or safety or other reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment and preventing serious damage to property.

There is no satisfactory alternative to the proposed action and: The action authorised will not be detrimental to the maintenance of the species concerned at a favourable conservation status in their natural range.

The Environment Act 2021 introduced a new exception to the Wildlife and Countryside Act offences, for any actions taken under the auspices of a Habitat Regs. Licence. Another change is that licences can now be issued in England for reasons of overriding public interest, providing the tests are met. This provision for development

activities was not previously available under the W&C Act. In order for the licensing tests to be correctly applied, it is essential that adequate bat survey information is supplied. Without this, a licence may not be granted.

In 2018, NE introduced a new 'low impact' licensing scheme, now titled the **Bat Mitigation Class Licence (BMCL)**. Ecologists can become 'Registered Consultants' to use this type of licence, with appropriate training and assessment. The BMCL is only suitable for low conservation status roosts of common bat species.

In 2018, NE announced the introduction of a **Bats in Churches Class Licence**, allowing appropriately trained Registered Consultants to use a more streamlined process when the presence of bats in a church is resulting in significant impacts.

In 2021, NE began a pilot of the **Earned Recognition Scheme**, where a consultant's competence in undertaking survey work and associated mitigation, etc., is assessed and accredited. Using an accredited consultant allows developers to experience a more streamlined licensing process. A competency framework defines the requirements for different levels of accreditation. A second pilot phase, known as Beta ER, is currently underway.

It is also possible, in England, to apply for an **organisational licence**, which licences organisations (under specific conditions) to carry out certain routine activities affecting bats.

Planning Policy Context

The biodiversity duty is imposed in England through the Environment Act 2021, which amends the **Natural Environment and Rural Communities (NERC) Act 2006** by adding the words 'and enhance' alongside 'conserve'. Public authorities must consider what action they can take to further the biodiversity objective.

Relevant Policy documents in England are:

National Planning Policy Framework (NPPF), Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations & their Impact Within the Planning System (2005) and National Planning Practice Guidance Natural Environment (2019).

In addition to the national policy guidance, regional and local planning policies should be consulted and **NE's Standing Advice to LPAs (GOV.UK.2022A)** may be relevant. Planners are required to consider protected species

as a material consideration when assessing a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Where bats may be present, this will include the need for adequate bat surveys to establish the presence or absence of bats, to predict the likely impact on bats and their roosts and if

necessary, to design appropriate mitigation measures, etc.. In planning terms, development includes activities requiring outline or full planning permission, permitted development, listed building consent and/or prior approval to demolish. SSSI consent may also be needed. Further details are provided in Clauses 6 to 8 of BS42020 (BS1, 2013) see <https://knowledge.bsigroup.com/products/biodiversity-code-of-practice-for-planning-and-development-standard>

Additionally, the Partnership for Biodiversity in Planning (PBP) Project, funded by the Esmée Fairbairn Foundation, was a partnership of 19 organisations in the conservation, planning and development sectors and has produced an online, interactive trigger list called the Wildlife Assessment check (WAC) – <https://www.biodiversityinplanning.org/wildlife-assessment-check>