



Date: 25 September 2025

Our ref: 06903

Katherine Williams
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/25/1593
Location: Woodlands Close And Land To The North Of Burleigh Lane Crawley Down Crawley West Sussex
Proposal: The demolition of numbers 9-11 Woodlands Close together with the demolition of other existing buildings on site and erection of 48 dwellings (Use Class C3) with open space, landscaping, car parking and associated infrastructure including provision of internal access roads and access road onto Woodlands Close.

Thank you for consulting Place Services on the above full application.

No ecological objection	<input type="checkbox"/>
Recommend approval subject to attached conditions	<input type="checkbox"/>
Further information required/Temporary holding objection on:	<input checked="" type="checkbox"/>
• European Protected Species (bats)	
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 Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting, June 2025) and Protected Species Report (Urban Edge Environmental Consulting, December 2023) supplied by the applicant, relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation.

We are not satisfied that there is sufficient ecological information available for determination of this application and recommend that details of bat survey results, mitigation & enhancement measures are required to make this proposal acceptable. The reasons for this are outlined below:

European Protected Species (Bats):

The Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting, June 2025) recommended that one further emergence survey is conducted on each of the three buildings assessed as having 'low suitability' for roosting bats; buildings B5, B9 and B10. In addition, a Ground Level Tree Assessment (GLTA) was recommended, to be conducted by a suitably qualified ecologist on the trees proposed to be felled. If the GLTA recommends further emergence surveys, the results of these will also be required prior to determination. While the Protected Species Report (Urban Edge Consulting, December 2023) reported the results of bat activity surveys, there was no mention of bat emergence surveys or a GLTA.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, European Protected Species. These surveys are required prior to determination because Government Standing Advice indicates that you should "*Survey for great crested newts if there's a pond within 500 metres of the development, even if it only holds water some of the year*" and "*Survey for bats if the area includes buildings or other structures that bats tend to use or there are trees with features that bats tend to use nearby*".

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 – Great Crested Newt:

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.

Hallie Rees MSci (Hons)

A Current Qualifying Member of CIEEM
Assistant Ecological Consultant
Place Services at Essex County Council
Email: PlaceServicesEcology@essex.gov.uk



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.