



Date: 16 October 2025

Our ref: 08398

Kate Turner  
Horsham District Council  
Parkside  
Horsham  
West Sussex  
RH12 1RL

By email only: Planning Department, [planning@horsham.gov.uk](mailto:planning@horsham.gov.uk)

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*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Horsham 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.*

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**Application:** DC/25/1234  
**Location:** Rowfold Lodge Coneyhurst Road Billingshurst West Sussex RH14 9DD  
**Proposal:** Demolition of existing buildings and erection of a dwelling (as an alternative to Prior Approval Ref. DC/24/0304)

Thank you for consulting Place Services on the above application.

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

Please note that following receipt of Natural England's position statement on developments in the Sussex North Water Supply Zone, decisions on planning applications should await the completion of a Sussex North water neutrality strategy.

## **Summary**

We have reviewed the Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.02 (Leith Ecology Consulting, August 2025), relating to the likely impacts of development on designated sites, protected and Priority species and habitats and the identification of proportionate mitigation. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We are not satisfied that there is sufficient ecological information on protected species available for determination of this application and recommend that further information is provided prior to determination. The reasons for this are outlined below:

### **European Protected Species: bats**

We note from the Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.02 (Leith Ecology Consulting, August 2025) that there is a cluster of single-storey, timber framed equestrian and ancillary outbuildings, which have not been individually identified. The buildings have been assessed across the cluster as providing negligible to either low or low/moderate suitability for roosting bats (Ecological Constraints and Opportunities, Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.02 (Leith Ecology Consulting, August 2025)). We understand that the buildings have been inspected during internal and external surveys which produced no evidence of bats roosting. However, Table 7.2 of the Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists Good Practice Guidelines (4<sup>th</sup> edition) advises that one dusk emergence survey visit is required for buildings which have low bat roost potential and two survey visits are required for moderate bat roost potential. In general, we support the non-licensed Precautionary Method Statement in Further Survey Recommendations, Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.02 (Leith Ecology Consulting, August 2025)), but we request clarification as to the number of buildings present, together with each building's bat roost potential and whether additional surveys are required. This is in accordance with [Government Standing Advice](#).

The additional information is 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.

See Appeal Decisions Ref: APP/P1560/W/24/3344547 at The Oaks, Clacton Road Weeley Essex CO16 9EF and APP/W3520/W/17/3174638 Pooles Farm, Thorney Green Road, Stowupland IP14 4AJ, where the appeals were dismissed as one of the main issues was the effect of the proposal on protected species. The Inspector could not be sure that there would be no adverse effect on protected species in the absence of ecological information. We also

highlight that this information is also requested by the Inspector even where ecology has not been a reason for refusal.

### **Additional Comments**

The site lies approximately 6.4km east of The Mens Special Area of Conservation (SAC) and therefore lies within the 6.5km Key Conservation Area for this SAC, within which all impacts must be assessed (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The qualifying feature for The Mens SAC is Barbastelle bat, but there are no records for this species within 2km of the site (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 59 other records for bats within 2km of the site, including Common and Soprano Pipistrelle, Brown Long-eared and Noctule (SxBRC). No European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site ([MAGIC maps](#)).

The site lies 11.4km east of Ebernoe Common SAC and is therefore inside the 12km Wider Conservation Area for this SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 8.6km northeast of Arun Valley SAC, SPA and Ramsar site.

We support the implementation of a Precautionary Method Statement for mobile protected species (including reptiles and Hedgehog, which is a Priority and threatened species) as recommended in the Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.02 (Leith Ecology Consulting, August 2025). This needs to be secured by a condition of any consent and implemented in full.

If external lighting is required, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.02 (Leith Ecology Consulting, August 2025) 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.

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 should be secured by a condition of any consent.

Please note that 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 overcome our holding objection.

Please contact us with any queries.

**Hayley Dean MCIEEM MSc BSc (Hons)**  
**Senior Ecological Consultant**  
 Place Services at Essex County Council  
 Email: [PlaceServicesEcology@essex.gov.uk](mailto:PlaceServicesEcology@essex.gov.uk)



Place Services provide ecological advice on behalf of Horsham 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.*