



Date: 16 October 2025

Our ref: 09331

Alice Johnson
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

By email only: Planning Department, planning@horsham.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 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.

Application: DC/25/1146
Location: Leonardslee Gardens Brighton Road Lower Beeding West Sussex RH13 6PP
Proposal: Extension to the visitor entrance building to house a new ticket sales area and café; Infil-ling roof to the former generator block courtyard, re-roofing of the Alpine House and in-ternal/external reconfigurations and link extension; Single storey winter garden conserv-atory to the Stable Block; Terrace extension to the east and internal/ external reconfigu-rations; Change of use from redundant staff offices and staff accommodation within the stable block to guest accommodation including extension to Honey Cottage; Change of use to the partial first floor of the Red House to staff accommodation; Small WC extension, reinstated chimney stack, and roof alterations to the Engine House; Lightweight wedding pavilion to the lawn, south of Leonardslee House; Landscaping changes in-cluding to the forecourt of Leonardslee House.

Thank you for consulting Place Services on the above application.

No ecological objection	<input type="checkbox"/>
No ecological objection subject to attached conditions	<input type="checkbox"/>
Further information required/Temporary holding objection	<input checked="" type="checkbox"/>

European Protected Species (bats)	
Recommend Refusal	<input type="checkbox"/>
Subject to Natural England's comments on the conclusion of the Water Neutrality AA	<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 following documents relating to the likely impacts of development on designated sites, protected and Priority species & habitats, and identification of appropriate mitigation measures:

- Dusk Emergence Survey Report (Temple Group Ltd., September 2024)
- Preliminary Ecological Appraisal and Preliminary Roost Assessment (Stable Block) Version 1.0 (Temple Group Ltd., December 2023)
- Preliminary Ecological Appraisal and Preliminary Roost Assessment (Engine House) Version 1.0 (Temple Group Ltd., December 2023)
- Preliminary Ecological Appraisal (The Bandstand or Wedding Pavilion) Version 1.0 (Temple Group Ltd., December 2023)
- Preliminary Ecological Appraisal and Preliminary Roost Assessment (Former Generator Block) Version 1.0 (Temple Group Ltd., December 2023)

We note that the Dusk Emergence Survey Report (Temple Group Ltd., September 2024) includes Honey Cottage, Clocktower Café and the Red House.

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 available for determination of this application and recommend that further information for bats is provided prior to determination. The reasons for this are outlined below:

European Protected Species - bats

We note from the Dusk Emergence Survey Report (Temple Group Ltd., September 2024) that the three dusk emergence surveys undertaken in May, June and July 2024 on the Clocktower Café and Honey Cottage confirmed the presence of a roost for Brown Long-eared bats. However, we understand from Section 4.10 of the Dusk Emergence Survey Report (Temple Group Ltd., September 2024) that the works to Honey Cottage and the Clocktower Café will not impact the roost and therefore we support the implementation of a non-licensed Precautionary Method Statement for bats.

We also note from the Dusk Emergence Survey Report (Temple Group Ltd., September 2024) that no bats were observed emerging from the proposed working area of the Red House during dusk emergence surveys undertaken in June and July 2024, although we understand from Section 4.10 that there is an unclassified bat roost within this building. We understand from Section 1.16 that the works to the Red House include insulation to the roof

of 'Office 1', which comprises works to the underside of existing rafters with a plasterboard lining. We therefore request justification as to why a mitigation licence for bats is not required.

European Protected Species – Hazel Dormouse

We support the implementation of a non-licensed Precautionary Method Statement for Hazel Dormouse in the Preliminary Ecological Appraisal and Preliminary Roost Assessment (Stable Block) Version 1.0 (Temple Group Ltd., December 2023). This is because there are recent records for Hazel Dormouse within 100m of the site and works will be undertaken in woodland to the east which has suitable habitat for this species.

The outline measures for the non-licensed Precautionary Method Statements for bats and for Hazel Dormouse and the additional information on bats with regard to the Red House need to be submitted to the LPA prior to determination in accordance with [Government Standing Advice for bats](#) and for [Hazel Dormouse](#), and so that the LPA has certainty of likely impacts on protected species.

The additional information for bats and Hazel Dormouse is required prior to determination because paragraph 99 of 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 required to provide the LPA with certainty of 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.

This further information is therefore required to provide the LPA with certainty of impacts on legally protected species and enable it to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006 (as amended).

Additional information

We note from the Dusk Emergence Survey Report (Temple Group Ltd., September 2024) that trees T118 and T119, which are non-native, require removal in order to facilitate the building of a terrace to the west of the Clocktower Café in adjacent woodland. An assessment made in 2024 concluded that the trees do not have potential bat roosts. Unfortunately, the report (Temple (2024b) Garden Entrance, Honey Cottage, Clock Tower Cafe and Village Centre, Leonardslee Lakes and Gardens, West Sussex, Preliminary Ecological Appraisal)) has not been uploaded for this application. However, we agree that no further surveys for bats and trees is required.

We note from the Preliminary Ecological Appraisal and Preliminary Roost Assessment (Engine House) Version 1.0 (Temple Group Ltd., December 2023) that, although the Engine House has moderate suitability to support roosting bats, there will be no direct impacts to the roof space. We therefore agree that no further surveys for bats are required for this building.

We also note from the Preliminary Ecological Appraisal (The Bandstand or Wedding Pavilion) Version 1.0 (Temple Group Ltd., December 2023) that there are no buildings or mature trees

present on this site and therefore agree that no further surveys for bats are required for this location.

We understand from the Preliminary Ecological Appraisal and Preliminary Roost Assessment (Former Generator Block) Version 1.0 (Temple Group Ltd., December 2023) that the site comprises the Dolls House Museum (moderate bat roost potential), lean-to (negligible bat roost potential), greenhouse (negligible bat roost potential) and an Empress tree. As only the lean-to and greenhouse will be impacted by the works, we agree that no further surveys for bats are required for this location.

We support the implementation of a Precautionary Method Statement for reptiles and mobile protected species (including Hedgehog, which is a Priority and threatened species) in Section 4.42 of the Preliminary Ecological Appraisal and Preliminary Roost Assessment (Stable Block) Version 1.0 (Temple Group Ltd., December 2023), Section 4.23 of the Preliminary Ecological Appraisal and Preliminary Roost Assessment (Engine House) Version 1.0 (Temple Group Ltd., December 2023), Section 4.29 of the Preliminary Ecological Appraisal (The Bandstand or Wedding Pavilion) Version 1.0 (Temple Group Ltd., December 2023) and Section 4.28 of the Preliminary Ecological Appraisal and Preliminary Roost Assessment (Former Generator Block) Version 1.0 (Temple Group Ltd., December 2023).

We support the implementation of a Construction Environmental Management Plan – Biodiversity as there is ancient woodland (irreplaceable habitat) within 30m of the site and the site is within wood-pasture and parkland Priority habit (Preliminary Ecological Appraisal and Preliminary Roost Assessment (Stable Block) Version 1.0 (Temple Group Ltd., December 2023)) and Preliminary Ecological Appraisal and Preliminary Roost Assessment (Former Generator Block) Version 1.0 (Temple Group Ltd., December 2023).

We support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Dusk Emergence Survey Report (Temple Group Ltd., September 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.

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

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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.