



Date: 20 February 2026

Our ref: 14066

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

By email only:

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/25/1234
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 re-consulting Place Services on the above application.

No ecological objection	<input type="checkbox"/>
No ecological objection subject to attached conditions	<input checked="" type="checkbox"/>
Further information required/Temporary holding objection	<input type="checkbox"/>
Recommend Refusal	<input type="checkbox"/>
Subject to Natural England's comments on the conclusion of the LPA's Appropriate Assessment	<input type="checkbox"/>

[Please refer to Horsham District Councils advice regarding Water Neutrality requirements following Natural England's Withdrawal Statement \(31st October 2025\).](#)

Summary

We have reviewed the Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.03 (Leith Ecology Consulting, December 2025) and 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 note from the Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.03 (Leith Ecology Consulting, December 2025) that the following structures to be demolished have limited bat roost potential:

Low bat roost potential

Structure 1 (tack room)

Structure 2 (store)

Negligible to low bat roost potential

Structure 3 (central store)

Structure 5 (equestrian stable 1) negligible to low

Negligible bat roost potential

Structure 4 (stable stalls section) negligible

Structure 6 (hay storage barn) negligible

We understand the structures have been re-assessed and we now support the non-licensed Precautionary Method Statement for bats in Appendix 3 Recommendations (p. 43) for structures 1, 2, 3 and 5. This should be secured by a condition of any consent and implemented in full. We note that Structures 4 and 6 have negligible bat roost potential.

The site lies approximately 6.4km east of The Mens Special Area of Conservation (SAC) and is therefore within the 6.5km Key Conservation Area for the SAC within which all impacts must be assessed as habitats within this zone are considered critical for sustaining the populations of bats within the SACs (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The qualifying feature of the 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 records of bats within 2km of the site, including Common and Soprano Pipistrelle, Brown Long-eared and Noctule (SxBRC). No European Protected Species Mitigation Licences have been granted within 2km of the site ([MAGIC maps](#)).

The site lies approximately 11.4km east of Ebernoe Common SAC and therefore lies 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 understand from the submitted documents that the 0.14ha site comprises modified grassland, ornamental hedgerows, bramble and mixed scrub, hardstanding and buildings, with no trees on site. Five native trees will be planted, 450m² of species-rich grassland will be enhanced, 90m² of mixed native scrub will be established and 60m of species-rich native hedgerows will replace the existing non-native hedgerows.

Therefore, there will be no severance to the flight lines of foraging or commuting bats from the SAC and habitat connectivity within the site will be maintained.

We therefore believe there will be no Adverse Effect on Integrity of the bat SAC. We advise the LPA to prepare a project level HRA Screening Report to record its decision and retain on file.

If external lighting is required, and as Barbastelle bat may use the onsite habitat, we recommend that the use of external light should be avoided or minimised 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 support the implementation of the Precautionary Method Statement for mobile protected and Priority species (including reptiles and Hedgehog, which is a Priority and threatened species) in the Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.03 (Leith Ecology Consulting, December 2025). This should be secured by a condition of any consent and implemented in full.

We are satisfied that there is sufficient ecological information available for determination of this application. We have no objections on ecological matters excluding Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the [NatureSpace Partnership](#).

This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

The mitigation measures identified in the Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.03 (Leith Ecology Consulting, December 2025) should be secured by a condition of any consent and implemented in full. This is necessary to

conserve and enhance protected and Priority species particularly those recorded in the locality, which includes bats and mobile protected and Priority species.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.03 (Leith Ecology Consulting, December 2025) 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.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended) and delivery of mandatory Biodiversity Net Gain.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013. We recommend that submission for approval and implementation of the details below should be a condition of any planning consent:

Recommended conditions

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

“All mitigation measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.03 (Leith Ecology Consulting, December 2025), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. This includes the non-licensed Precautionary Method Statement for bats in Appendix 3 Recommendations (p. 43) and the Precautionary Method Statement for mobile protected and Priority species in the Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report Version R.03 (Leith Ecology Consulting, December 2025). This avoids impacts on European Protected Species and protected species.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.”

Reason: To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

2. PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT LAYOUT

“A Biodiversity Enhancement Layout for biodiversity enhancements listed in the Preliminary Ecological Appraisal and Biodiversity Net Gain Baseline Report

Version R.03 (Leith Ecology Consulting, December 2025) shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Enhancement Layout shall include the following:

- a) detailed designs or product descriptions for biodiversity enhancements; and*
- b) locations, orientations and heights for biodiversity enhancements on appropriate drawings.*

The enhancement measures shall be implemented in accordance with the approved details prior to occupation and all features shall be retained in that manner thereafter.”

Reason: To enhance protected and Priority species & habitats and allow the LPA to discharge its duties under paragraph 187d of the NPPF 2024 and s40 of the NERC Act 2006 (as amended) and Policy 31 of the Horsham Development Framework.

If external lighting is required:

3. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

“Prior to occupation, a “lighting design strategy for biodiversity in accordance with Guidance Note 08/23 (Institute of Lighting Professionals) shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a) identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and*
- b) show how and where external lighting will be installed so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.*

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.”

Reason: To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended) and Policy 31 of the Horsham Development Framework.

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.
- We are unable to respond directly to applicants/agents or other interested parties.
- Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer at the relevant LPA, who will seek further advice from us where appropriate.