Place Services
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Date: 6 November 2025 Our ref: 07256

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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/25/0196
Location: Meadowhurst Lyons Road Slinfold West Sussex
Proposal: Erection of a barn for the mixed use of stabling of private horses and the storage of hay / plant and machinery.

Thank you for re-consulting Place Services on the above application.

No ecological objection	☐
Recommend approval subject to attached conditions	☐
Further information required/Temporary holding objection: European Protected Species (Hazel Dormouse)	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the Water Neutrality Appropriate Assessment	☒

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 Reptile & HIS Survey Report and Mitigation Method Statement (Sylvatica Ecology Ltd., July 2025) and Preliminary Ecological Assessment (Sylvatica Ecology Ltd., January 2025) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

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

European Protected Species – Hazel Dormouse
As stated in our response dated 13th March 2025, we request clarification as to whether any of the native hedgerow which provides potential Hazel Dormouse habitat is to be removed. This is referred to as 'deciduous and coniferous treeline' in the Biodiversity Net Gain Assessment (Sylvatica Ecology Ltd., January 2025). If this is the case, we support the implementation of the non-licensed Precautionary Method Statement for Hazel Dormouse in Sections 6.12 and 6.13 of the Preliminary Ecological Assessment (Sylvatica Ecology Ltd., January 2025), which should be secured by a condition of any consent. We note that Section 5.5 of the Reptile & HIS Survey Report and Mitigation Method Statement (Sylvatica Ecology Ltd., July 2025) states that the schedule of works is yet to be finalised.

The clarification of the hedgerow removal for Hazel Dormouse 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.

Additional comments
We note from the Preliminary Ecological Assessment (Sylvatica Ecology Ltd., January 2025) that there are no buildings on site and that no trees will be removed. We therefore agree that no further surveys for bats are required.

The site lies approximately 10.5km northeast of The Mens Special Area of Conservation (SAC) and is therefore within the 12km Wider Conservation Area (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). One of the qualifying features for the SAC is Barbastelle bats, but there are no records for this species within 2km of the site (Sussex Biodiversity Record Centre – accessed under licence).

There are approximately 25 records of bats within 2km of the site, including Brown Long-eared, Common Pipistrelle, Natterer's bat, Soprano Pipistrelle, Daubenton's and Serotine bat

(Sussex Biodiversity Record Centre – accessed under licence). The site lies approximately 14.8km from Ebernoe Common SAC and is therefore outside the 12km Wider Conservation Area for this SAC; and lies approximately 15.3km northeast of Arun Valley SAC, SPA and Ramsar site. The site is 0.94ha in size and comprises other neutral grassland with bare ground, a non-native hedge and deciduous and coniferous treelines to the north and the west (Preliminary Ecological Assessment (Sylvatica Ecology Ltd., January 2025)).

We support the reptile mitigation strategy in Sections 5.4 and 5.5 of the Reptile & HIS Survey Report and Mitigation Method Statement (Sylvatica Ecology Ltd., July 2025). This is because the reptile surveys recorded low populations of Slow Worm and Grass Snake on site. This should be secured by a condition of any consent and implemented in full.

If external lighting is required, and, as Barbastelle bats may use this habitat, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Ecological Assessment (Sylvatica Ecology Ltd., January 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.

As mobile protected species may be present on site, including Hedgehog (Priority and threatened species), we support the implementation of the Precautionary Method Statement for mobile species in Section 6.7 of the Preliminary Ecological Assessment (Sylvatica Ecology Ltd., January 2025). This should be secured by a condition of any consent.

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.