



Date: 07 April 2026

Our ref: 15567

Bethan Tinning
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

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/26/0357
Location: Land North Of West Wantley Barn Fryern Road Storrington West Sussex RH20 4BJ
Proposal: Conversion, change of use and alterations and extensions to existing building to form 1no. detached self-build dwelling and associated works.

Thank you for consulting Place Services on the above application.

No ecological objection	☐
No ecological objection subject to attached conditions	☐
Further information required/Temporary holding objection: Irreplaceable habitat (ancient and semi-natural woodland)	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐

[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 Roost Assessment (Arbtech Consulting Ltd., July 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 available for determination of this application and recommend that additional information with regard to ancient and semi-natural woodland (irreplaceable habitat) is provided prior to determination. The reasons for this are outlined below:

Irreplaceable Habitat – Ancient and semi-natural woodland

We note from the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., July 2025) that the site lies within the 15m buffer zone for ancient and semi-natural woodland (irreplaceable habitat) which is located approximately 8m to the east of the site. In addition, the access to the site indicated on the Location Plan (Ordnance Survey, submitted February 2026) is not shown as within the redline boundary on the planning portal. [Government Standing Advice for Ancient Woodland](#) states '*You should refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees unless both of the following applies:*

- *there are wholly exceptional reasons*
- *there's a suitable compensation strategy in place*

To fully assess the impacts of the proposal, the LPA therefore needs additional ecological information for the site, particularly to demonstrate appropriate protection for the adjacent ancient woodland.

This information is required to provide the LPA with certainty of impacts on legally protected habitats and be able to secure appropriate mitigation. 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 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

We note from the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., July 2025) that Building B1 (single storey piggery) has negligible bat roost potential and that there are no trees on site. Therefore, we agree that no further surveys are required for bats.

As the site lies approximately 8.9km southeast of The Mens Special Area of Conservation (SAC) ([MAGIC maps](#)), it is within the 12.0km Wider Conservation Area for this SAC. Within this area significant impacts or severance to flightlines must be considered. This is because the Wider Conservation Area is the full extent of the range of foraging areas required by Barbastelle bats, which are the qualifying feature of the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol).

The site lies approximately 14.5km southeast of Ebernoe Common Special Area of Conservation (SAC) and therefore lies outside the 12.0km Wider Conservation Area for this SAC. The site also lies approximately 3.4km east of Arun Valley SAC, SPA and Ramsar site.

There is one record for this species within 2km of the site, approximately 1.5km southeast (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 106 records of bats within 2km of the site, including Serotine, Noctule, Natterers, Common and Soprano Pipistrelle (SxBRC). Two European Protected Species Mitigation Licences have been granted within 2km of the site: a) 1.5km to the southeast for Soprano Pipistrelle bat in 2014; and b) 1.9km to the southwest for Brown Long-eared bat, Common Pipistrelle and Serotine bat in 2015 ([MAGIC maps](#)).

As Barbastelle may use the onsite habitat, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., July 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 non-licensed Precautionary Method Statement for Otter (European Protected Species) in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., July 2025). This needs to be secured by a condition of any consent and implemented in full.

We also support the Precautionary Method Statement for reptiles and mobile protected and Priority species (including Hedgehog, which is a Priority and threatened species) in the

Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., July 2025) which needs to be secured by a condition of any consent and implemented in full.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., July 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.

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 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.

Hayley Dean MCIEEM MSc BSc (Hons)

Senior Ecological Consultant

Place Services at Essex County Council

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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.*