Place Services
Essex County Council
County Hall, Chelmsford
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Date: 24 September 2025 Our ref: 08393

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Horsham District Council
Parkside
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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/25/0765
Location: Mill Lodge Mill Lane Ashington West Sussex RH20 3BX
Proposal: Erection of 1no. single storey detached self-build / custom-build dwelling.

Thank you for re-consulting Place Services on the above application. These comments follow previous internal reference: 05706.

No ecological objection	☐
Recommend approval subject to attached conditions	☐
Further information required/Temporary holding objection pending information on European Protected Species (bats)	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's 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 unless they can demonstrate water neutrality.

Summary

We have reviewed the Ground level Tree Assessment (Arbtech Consulting Ltd., July 2025) and Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., October 2024), relating to the likely impacts of development on designated sites, protected and Priority species & habitats and appropriate mitigation measures. Please note that comments on mandatory Biodiversity Net Gain are provided by Horsham District Council in-house.

We are still 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 support the implementation of a non-licensed Precautionary Method Statement for bats in the Ground level Tree Assessment (Arbtech Consulting Ltd., July 2025) as Tree 11 (Gum) has Potential Roost Features for Individual bats (PRFs-I). However, we highlight that the Method Statement should include inspection of Tree 11 (Gum) by endoscope on the day and felling under the supervision of a licensed bat ecologist, as required in Table 6.3 of 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023). In addition, we highlight that appropriate compensation will be required in advance of works to avoid loss of roost resource (Reason and Wray (2023) UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1. Chartered Institute of Ecology and Environmental Management). We therefore request an updated non-licensed Precautionary Method Statement for bats to include these measures is submitted to the LPA in accordance with Government Standing Advice.

As stated in our response dated 8th July 2025, two European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site: a) for Brown Long-eared bat approximately 1.3km northwest of the site in 2016 and b) for Brown Longeared bat and Common Pipistrelle in 2015 approximately 1.8km northwest of the site (MAGIC maps). There are approximately 31 records of bats within 2km of the site, including Brown Long-eared bat, Common Pipistrelle, Soprano Pipistrelle, Noctule, Serotine, Daubenton's Bat, Natterers Bat and Nathusius Pipistrelle (SBISx – accessed under licence). No records of Barbastelle were returned.

The updated non-licensed Precautionary Method Statement for bats 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.

Furthermore, the Local Planning Authority, as a competent authority, should have regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) when reaching planning decisions and must not leave this until the licence application stage. Therefore, if a European Protected Species Mitigation Licence is required for this application, appropriate mitigation measures to support the provision of the licence must also be outlined prior to determination to allow certainty to the LPA that a licence will likely be granted.

Additional Comments

We note from the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., October 2024) that the Building B1 (carport) has negligible bat bat roost potential. We understand from the Design Access Statement Incorporating Heritage Statement (Manorwood, April 2025) that the main dwelling onsite will not be impacted by the works. We therefore agree that no further surveys for bats are required in relation to buildings.

We also support the implementation of the Precautionary Method Statement for mobile protected species (including reptiles and Hedgehog, which is a Priority and threatened species) in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., October 2024), which needs to be secured by a condition of any consent and implemented in full.

We support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., October 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 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.

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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.