



Date: 30 September 2026  
Our ref: 22231

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Horsham District Council  
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RH12 1RL

By email only: [planning@horsham.gov.uk](mailto:planning@horsham.gov.uk)

**Contains Sensitive Information**

*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.*

**Application:** DC/26/1297  
**Location:** Wiltshires Farm Pickhurst Lane Pulborough West Sussex  
**Proposal:** "Demolition of an agricultural building and shed, and the erection of a dwelling with associated driveway and landscaping."

Thank you for consulting Place Services on the above application.

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

**Please refer to Horsham District Council's advice regarding Water Neutrality requirements following Natural England's Withdrawal Statement (31st October 2025).**

## **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:

- Bat Survey Report (AEWC, August 2026)
- Preliminary Ecological Appraisal (AEWC, July 2026)
- Reptile Survey Report (AEWC, July 2026)

Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

### European Protected Species (bats):

We are satisfied sufficient emergence survey effort has been undertaken and is reported within the Bat Survey Report (AEWC, August 2026). The surveys did not identify any roosting bats. As such, we agree the works can proceed without the need for a European Protected Species Mitigation Licence.

We recommend that any external lighting is sensitive to wildlife and secured by a condition of any consent to avoid impacts to foraging and commuting bats. This must follow the [Guidance Note 8 Bats and artificial lighting](#) (The Institute of Lighting Professionals & Bat Conservation Trust). In summary, it is highlighted that the following measures should be implemented for the lighting design, which could be informed by a professional ecologist:

- 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.

The site lies approximately 3.05km southeast of The Mens Special Area of Conservation (SAC) (MAGIC maps) and is therefore within the 6.5km key Conservation Area for this SAC. Within this area 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, there are 5 records of Barbastelle within 2km of the site. The nearest is approximately 550m southwest, recorded in 2010 from approximately (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 68 records of bats within 2km of the site, including Natterers and Brown Long-eared Bat (SxBRC). The site also lies approximately 8.65km southeast of Ebernoe Common Special Area of Conservation (SAC) and therefore lies inside the 12.0km Wider Conservation Area for this SAC. No European Protected Species Mitigation Licences have been granted within 2km of the site (MAGIC maps). The site lies approximately 2.1km north of Arun Valley SAC, SPA and Ramsar site.

We understand from the submitted documents that the site comprises modified grassland and developed land. External lighting will be avoided or minimised. No trees are being removed, and the proposals include a large amount of tree planting in relation to BNG proposals.

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.

[REDACTED]

#### Protected species (reptile)

The Reptile Survey Report (AEWC, July 2026) has undertaken further reptile surveys, in line with good practice guidelines. The surveys identified low numbers of Grass Snake and has recommended precautionary mitigation measures to safeguard this species during

construction. We are satisfied given the scale of retained habitat and low numbers of reptiles identified this is an appropriate strategy. We recommend the mitigation measures are detailed within a CEMP: Biodiversity and secured by a condition of any consent.

#### Irreplaceable Habitats (Ancient Woodland)

There is Irreplaceable Habitats in the form of Ancient Woodland to the east of the site, separated by a road. The Preliminary Ecological Appraisal (AEWC, July 2026) includes recommendations to ensure this habitat is not impacted. We are satisfied the recommendation is appropriate and recommend measures are detailed within a CEMP: Biodiversity and secured by a condition of any consent.

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 Bat Survey Report (AEWC, August 2026), Preliminary Ecological Appraisal (AEWC, July 2026) and Reptile Survey Report (AEWC, July 2026) 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.

We also support the proposed reasonable biodiversity measures for protected, Priority and threatened species, as outlined in National Policy N2 1(f) of the National Planning Policy Framework (August 2026). Reasonable biodiversity measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Measures Strategy to be secured as 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 Bat Survey Report (AEWC, August 2026), Preliminary Ecological Appraisal (AEWC, July 2026) and Reptile Survey Report (AEWC, July*

2026) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

*This will 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 COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN FOR BIODIVERSITY**

*“A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority.*

*The CEMP (Biodiversity) shall include the following.*

- a) *Risk assessment of potentially damaging construction activities.*
- b) *Identification of “biodiversity protection zones”.*
- c) *Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) *The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) *The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) *Responsible persons and lines of communication.*
- g) *The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) *Use of protective fences, exclusion barriers and warning signs.*

*The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority”*

**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).

### 3. **PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY MEASURES STRATEGY**

*“Prior to any works above slab level, a Biodiversity Measures Strategy for protected, Priority and threatened species, prepared by a suitably qualified ecologist, shall be submitted to and approved in writing by the local planning authority.*

*The content of the Biodiversity Measures Strategy shall include the following:*

- a) Purpose and conservation objectives for the proposed measures or features;*
- b) detailed designs or product descriptions to achieve stated objectives;*
- c) locations of proposed measures or features by appropriate maps and plans (where relevant);*
- d) persons responsible for implementing the measures or features; and*
- e) details of initial aftercare and long-term maintenance (where relevant).*

*The works shall be implemented in accordance with the approved details shall be retained in that manner thereafter.”*

**Reason:** To support protected, Priority and threatened species and allow the LPA to discharge its duties under National Policy N2 1(f) of NPPF August 2026 and s40 of the NERC Act 2006 (as amended).

### 4. **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 (through provision of lighting layout plans, isolux contour plans, luminaire specifications, mounting heights, aiming angles, shielding measures, and lighting control strategies) 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).

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



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.*

*Place Services have a policy relating to the use of AI. Unless otherwise stipulated, any AI use will be limited to basic proof-reading, grammar, and spelling correction. This response has been reviewed by the author(s). If you have any queries, please [contact us](#) for information about our AI guidance.*