Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
www.placeservices.co.uk

Date: 10 November 2025 Our ref: 08393

Shazia PenneHorsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

By email only: Planning Department,
planning@horsham.gov.uk;landscape.heritage@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	☐
No ecological objection subject to attached conditions	☒
Further information required/Temporary holding objection	☐
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 now satisfied that there is sufficient ecological information available to support determination of this application.

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).

The updated non-licensed Precautionary Method Statement for bats should be provided within a Biodiversity Method Statement and secured by a condition of any consent.

We note from the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., October 2024) that the Building B1 (carport) has negligible 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.

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 site is approximately 12.26km from The Mens Special Area of Conservation (SACs) for which one of the qualifying features is Barbastelle bats. Therefore, the site lies outside the 12km Wider Conservation Area for the SACs (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol).

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 recommend this is included within the recommended Biodiversity Method Statement.

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.

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 Roost Assessment (Arbtech Consulting Ltd., October 2024) 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 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). Reasonable biodiversity enhancement measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Enhancement 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).

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 Roost Assessment (Arbtech Consulting Ltd., October 2024) 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: BIODIVERSITY METHOD STATEMENT**

"No development shall take place (including any demolition, ground works, site clearance) until a Biodiversity Method Statement for protected and Priority species (bats, reptiles and Hedgehog) has been submitted to and approved in writing by the local planning authority.

The content of the method statement shall include the following:

a) *purpose and objectives for the proposed works;*
b) *detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);*
c) *extent and location of proposed works shown on appropriate scale maps and plans;*
d) *timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;*
e) *persons responsible for implementing the works;*
f) *initial aftercare and long-term maintenance (where relevant);*
g) *disposal of any wastes arising from works.*

The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter."

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), s40 of the NERC Act 2006 (as amended) and s17 Crime & Disorder Act 1998.

3. PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY

"Prior to any works above slab level, a Biodiversity Enhancement 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 Enhancement Strategy shall include the following:

a) Purpose and conservation objectives for the proposed enhancement measures;
b) detailed designs or product descriptions to achieve stated objectives;
c) locations of proposed enhancement measures by appropriate maps and plans (where relevant);
d) persons responsible for implementing the enhancement measures; 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 enhance protected, Priority and threatened species and allow the LPA to discharge its duties under paragraph 187d of NPPF 2024 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 appropriate lighting plans and technical specifications) 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.

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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.