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Our ref: 19502
Date: 14 July 2026

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.

Application: DC/26/0332
Location: Little Fairseat Georges Lane Storrington West Sussex
Proposal: Demolition of existing dwelling and erection of a replacement dwelling, erection of a double bay garage, demolition of outbuildings, erection of new guest suite and associated landscaping works.

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

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 refer to Horsham District Councils advice regarding Water Neutrality requirements following [Natural England's Withdrawal Statement \(31st October 2025\)](#).

Summary

We have reviewed the recently submitted documents relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures:

- Bat Survey (Urban Edge Environmental Consulting, June 2026)

- Preliminary Ecological Appraisal Report Revision 3 (Urban Edge Environmental Consulting, April 2026)
- Biodiversity Mitigation and Enhancement Plan Revision 3 (Urban Edge Environmental Consulting, April 2026)

We have also reviewed the previously submitted documents as follows:

- Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting, October 2024)
- Bat Survey (Urban Edge Environmental Consulting, October 2024)
- Biodiversity Mitigation and Enhancement Plan (Urban Edge Environmental Consulting, January 2026)
- Planning Statement (Lewis and Co, February 2026)
- Arboricultural Method Statement (David Archer Associates, April 2025)

Our previous comments dated 7th May 2026 and 31st March 2026 and those for related approved application DC/24/1870 refer.

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

We note from the Bat Survey (Urban Edge Environmental Consulting, June 2026) that update dusk emergence surveys undertaken in May 2026 on the main building (B1) and the garage (OB2) observed no bats emerging or returning to roost. We also note from the Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting Ltd., October 2024) that outbuildings OB1, OB3 and OB4 (all flat roofed sheds) have negligible bat roost potential. We therefore agree that no further surveys for bats and buildings are required.

We understand from the Preliminary Ecological Appraisal Report Revision 3 (Urban Edge Environmental Consulting, April 2026) that under the current plans all of the trees with Potential Roost Features (PRFs) for bats will be retained. However, if these plans change, further assessment will be required for Tree T1 (Silver Birch) with Potential Roost Features for Multiple bats (PRF-M). We also highlight that if the plans change so that trees with PRFs for Individual bats (PRFs-I) will be impacted, no further surveys would be required for these trees, but appropriate compensation would be required in advance of works which would need to be undertaken under a Precautionary Working Method Statement for bats. Therefore, we support the recommendation for additional assessment for roosting bats in Section 5.2.3 of the Preliminary Ecological Appraisal Report Revision 3 (Urban Edge Environmental Consulting, April 2026).

In addition, the site lies approximately 11.6km southeast of The Mens Special Area of Conservation (SAC) and therefore lies within the 12km Wider Conservation Area for The Mens SAC, for which significant impacts or severance to flightlines must be considered. The qualifying feature for The Mens SAC is Barbastelle bat, and there are two records for this

species within 2km of the site (Preliminary Ecological Appraisal Report Revision 3 (Urban Edge Environmental Consulting, April 2026) and SxBRC). There are approximately 97 other records for bats within 2km of the site, comprising Noctule, Soprano Pipistrelle, Brown Long-eared bat, Serotine, Daubenton's bat, Brandt's/Whiskered bat, Natterer's bat, Leisler's bat, Nathusius' Pipistrelle and Common Pipistrelle (SxBRC). Three European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site as follows: a) for Whiskered, Daubenton's and Natterer's bat 888m to the southwest in 2013; b) for Soprano Pipistrelle 1.2km to the west in 2015; and c) for Brown Long-eared bat 1.5km to the north in 2017 ([MAGIC maps](#)).

The site lies 17.3km southeast of Ebernoe Common SAC and is therefore outside the 12km Wider Conservation Area for this SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 6.1km east of Arun Valley SAC, SPA and Ramsar site.

We understand from the submitted documents that the c0.23ha site comprises previously developed land with buildings and hardstanding, modified grassland and introduced shrub, with other mixed woodland, Scot's pine woodland, mixed scrub, individual trees, bare ground and hedgerows. We understand from the Arboricultural Method Statement (David Archer Associates, April 2025) that the following trees and hedgerows will be removed: Tree Nos. 16 and 17 Scot's pine, Tree No. 23 Yew, Tree Nos. 24 and 25 Silver Birch, Tree Nos. 29 and 30 Wild cherry; H5 Laurel, H6 Privet, H7 Laurel and Leyland Cypress, H8 Rhododendron and H9 Lawson Cypress. The retained woodland and grassland will be enhanced to include the planting of native species and the removal of rhododendron. We previously recommended with the related application that an ecological design strategy should be implemented to compensate for the loss of the trees and hedgerows. This has been provided within this document Biodiversity Mitigation and Enhancement Plan (Urban Edge Environmental Consulting, January 2026) and we are satisfied that this can be secured.

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.

It is recommended in the Bat Survey (Urban Edge Environmental Consulting, June 2026) that external lighting should be avoided or reduced to minimum levels. If external lighting is required, a sensitive lighting scheme should be implemented for this application to mitigate against the increase in light measures following Bat Conservation Trust advice and the Institution of Lighting Professionals.

If external lighting is required and, as Barbastelle bats may use the onsite habitat, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Bat Survey (Urban Edge Environmental Consulting, June 2026)) 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 therefore believe that, with mitigation, there will be no Adverse Effect on Integrity of the SAC. We advise the LPA to prepare a project level HRA Appropriate Assessment to record its decision and consult Natural England on the conclusion.

We support the Biodiversity Mitigation and Enhancement Plan Revision 3 (Urban Edge Environmental Consulting, April 2026) which provides compensation for the loss of seven native and non-native trees and five hedgerows during the development. This needs to be secured by a condition of any consent and implemented in full.

As there is some suitable habitat for Hazel Dormouse on site and there is connectivity to woodland in the wider landscape, we support the implementation of the non-licensed Precautionary Method Statement for Hazel Dormouse in Section 2.10.1 of the Biodiversity Mitigation and Enhancement Plan Revision 3 (Urban Edge Environmental Consulting, April 2026). This needs to be secured by a condition of any consent and implemented in full.

We support the Precautionary Method Statement for mobile protected species (including Hedgehog, which is a Priority and threatened species) in Section 2.11.2 of the Biodiversity Mitigation and Enhancement Plan Revision 3 (Urban Edge Environmental Consulting, April 2026). This needs to be secured by a condition of any consent and implemented in full.

We are now satisfied that there is sufficient ecological information available to support determination of this application. Please note 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 recommend that the NatureSpace Partnership is consulted on this application.

We have considered the likely impacts on European Protected Species and applied the Favourable Conservation Status licensing test to demonstrate that the LPA, as a competent authority, has had regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) as this must not be left until the licence application stage when reaching planning decisions.

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 (Urban Edge Environmental Consulting, June 2026), Preliminary Ecological Appraisal Report Revision 3 (Urban Edge Environmental Consulting, April 2026) and Biodiversity Mitigation and Enhancement Plan Revision 3 (Urban Edge Environmental Consulting, April 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, including bats, Hazel Dormouse and mobile protected and Priority species.

We support the proposed reasonable biodiversity enhancements, including the bird and bat boxes and log pyramid/piles, which have been recommended within the Biodiversity Mitigation and Enhancement Plan Revision 3 (Urban Edge Environmental Consulting, April 2026) to secure net gains for biodiversity, as outlined under Paragraph 180d and 186d of the National Planning Policy Framework (December 2023). The reasonable biodiversity enhancement measures need to be secured by 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 (Urban Edge Environmental Consulting, June 2026), Preliminary Ecological Appraisal Report Revision 3 (Urban Edge Environmental Consulting, April 2026) and Biodiversity Mitigation and Enhancement Plan Revision 3 (Urban Edge Environmental Consulting, April 2026) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. This includes the non-licensed Precautionary Method Statement for Hazel Dormouse in Section 2.10.1 and the Precautionary Method Statement for mobile protected species in Section 2.11.2 of the Biodiversity Mitigation and Enhancement Plan Revision 3 (Urban Edge Environmental Consulting, April 2026). This avoids impacts on European Protected Species and protected species.

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 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 Hazel Dormouse 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.

Hayley Dean MCIEEM MSc BSc (Hons)
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 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.