

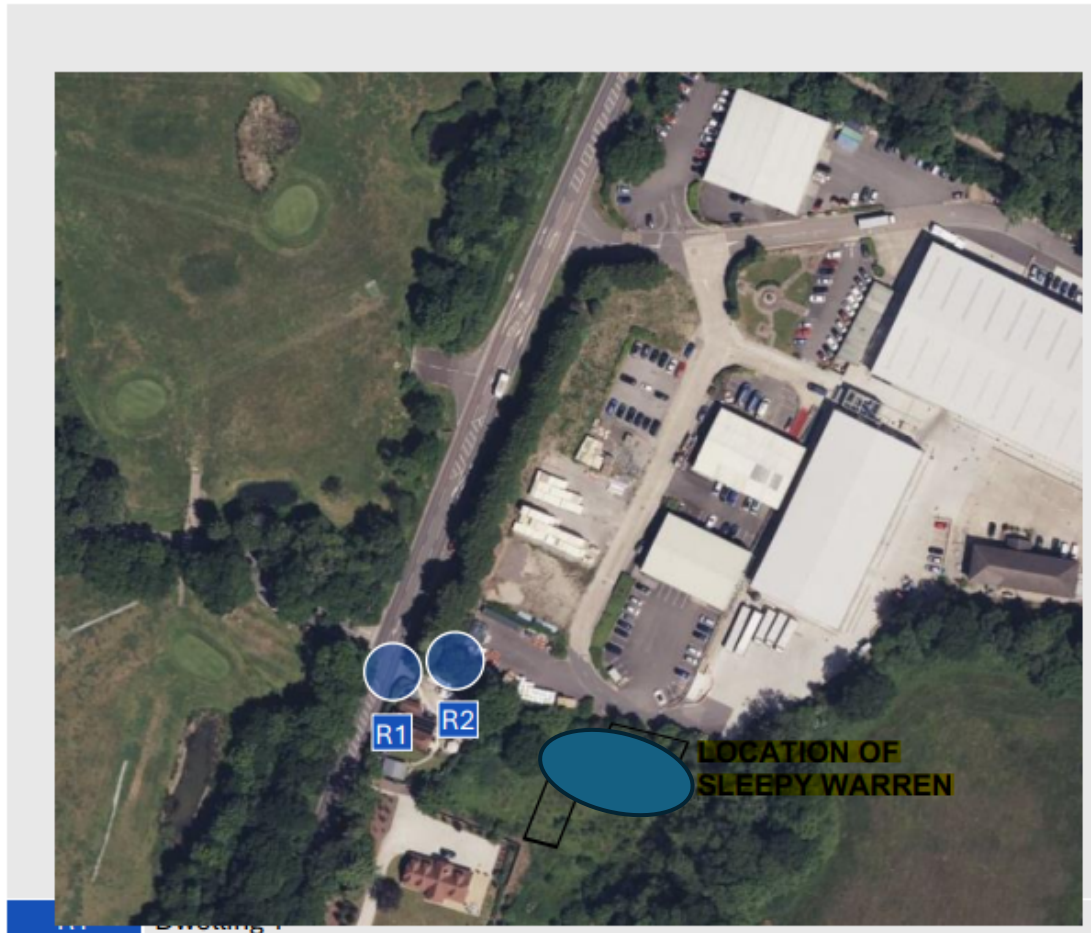
I write to formally object to the proposed installation of 8 metre high floodlighting columns at the neighbouring property, on the grounds of the following:-

- **Noise and disturbance** – The lighting is proposed to operate from 05:00–20:00. Vehicle movements, engines idling, and numerous truck horns are already audible from 06:00, and the earlier start would significantly increase disturbance to neighbouring residents. Activity of this nature at such an early hour represents an unreasonable level of noise pollution and is not neighbourly in nature
- **Light intrusion into habitable rooms** – Our property has two first-floor bedrooms facing the adjoining northern boundary, and the proposed lighting would cause glare and potentially disturb sleep, contrary to recognised guidance (ILP GN01) and the NPPF requirement for a high standard of amenity.
- **Ecological impact** – Our northern boundary (Applicants adjoining Southern Boundary) is a sensitive bat commuting corridor linked to the Sussex SAC. The proposed 8m columns are inconsistent with recently previously approved mitigation (removal of low-level lighting) and exceed recommended lux levels, threatening bat flightpaths and foraging habitat.
- **Inconsistency with previously agreed safeguards** – Introduction of significantly taller lighting in close proximity to a protected corridor undermines the ecological protections already applied and fails to demonstrate compliance with the Sussex Bat SAC Planning and Landscape Scale Enhancement Protocol.
- **Precautionary principle** – In the absence of robust evidence demonstrating no harm to bats or adjacent habitats, the proposal fails to meet statutory requirements under the Habitats Regulations.

We request that the Local Planning Authority fully considers these points and ensures the proposal is subject to appropriate ecological assessment, including a Habitats Regulations Assessment, before any permission is granted.

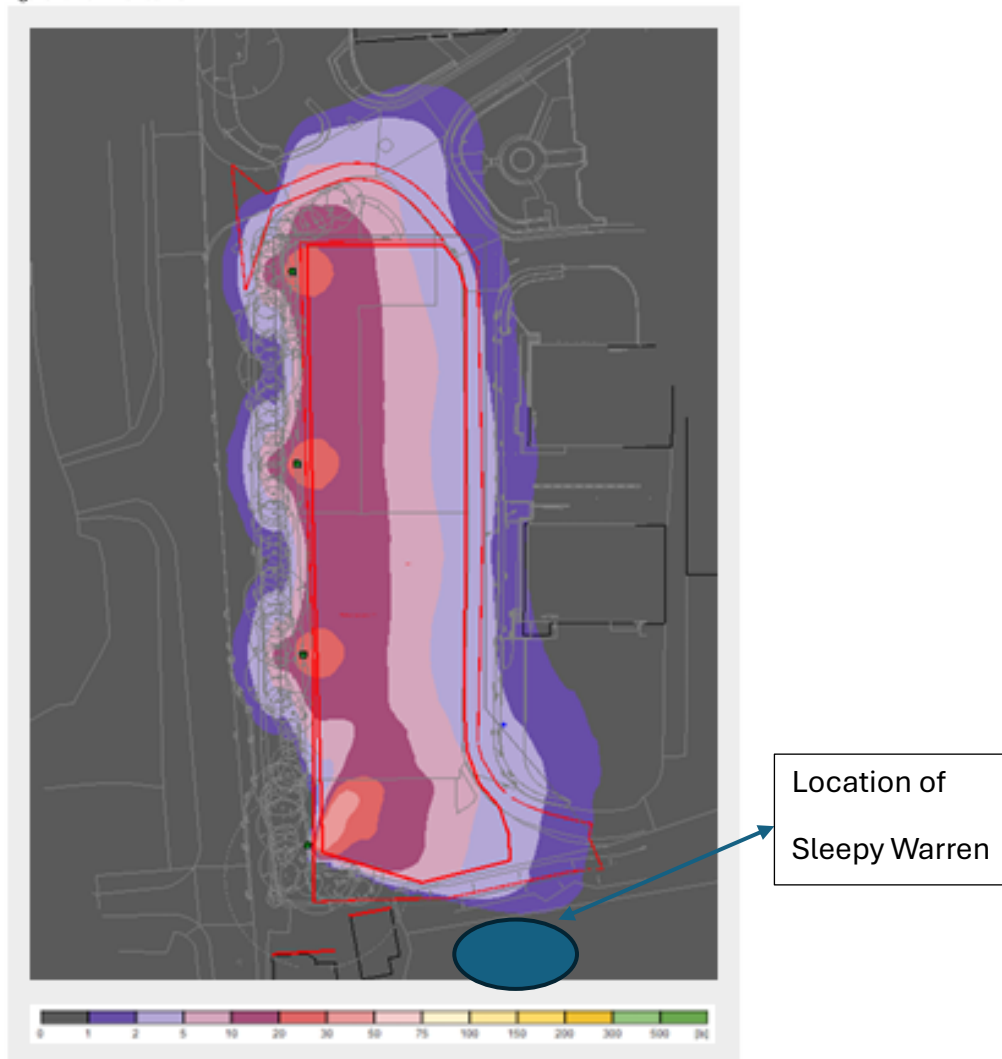
I note from the supplied diagram from the lighting assessment 250285-LTBL-REP-001 Figure 2 – Residential receptors that our property is not even on the diagram. Therefore, I have added below for clarity.

Figure 2. Residential receptors



Therefore, we will take the full brunt of any lighting of this scale and in particular the column closest to our boundary as this is facing directly towards us and not at the same trajectory and the other proposed lighting columns. The lighting lux drawing indicates this even with the external glare shield on type B column Figure 7 . illuminance view clearly shows the extent of such glare onto our property.

Figure 7. Illuminance view



The approved lighting strategy for our own adjacent property required the removal of low-level (1.5 m) lighting along the rear northern boundary (the applicants adjoining Southern Boundary) due to its proximity to woodland identified as suitable commuting and foraging habitat for the Barbastelle bat, a qualifying species of the Sussex SAC. This reflects the species' well-documented sensitivity to artificial lighting and the need to maintain a dark corridor along woodland edges.

In addition, our recent planning application for our adjoining property was specifically scrutinised in relation to bat flightpaths and commuting routes along the woodland edge, with particular emphasis placed on ensuring that lighting did not interfere with these established corridors. The requirement to remove proposed installed at 1.5m low-level lighting was imposed specifically to protect this flightpath and maintain a continuous dark corridor. In light of this, the proposal to introduce 8 metre high floodlighting columns in close proximity to the same habitat corridor appears fundamentally inconsistent with the ecological constraints that have already been applied within the immediate area.

In this context, the introduction of 8 metre high floodlighting columns in the same location represents a clear and significant inconsistency in the application of ecological safeguards.

Compared to the previously removed low-level domestic lighting, the proposed floodlighting would:

- Generate substantially greater light spill over a wider area
- Illuminate woodland edge habitat and potentially the tree canopy
- Increase ambient light levels and sky glow
- Disrupt established bat commuting routes and foraging behaviour

The site lies within the Wider Conservation Area associated with the Sussex SACs, and the surrounding habitat network is considered to provide functionally linked land for bat species. As such, there is a clear requirement to ensure that development does not result in the direct or indirect loss of habitat connectivity or availability for foraging and commuting.

The proposed lighting has the potential to result in:

- Direct degradation of habitat suitability through increased illumination
- Severance of established bat flightlines along the woodland edge
- Reduction in the usability of adjacent habitat for foraging

These impacts constitute a likely significant effect in the context of the Habitats Regulations and should be assessed accordingly.

It is particularly important to note that if low-level lighting was previously deemed unacceptable on this boundary due to its impact on bat habitat and associated flightpaths, then the introduction of significantly taller and more intensive lighting infrastructure in the same ecological setting cannot reasonably be considered acceptable without robust and detailed evidence to the contrary.

In accordance with the Sussex Bat SAC Planning and Landscape Scale Enhancement Protocol, development proposals must demonstrate that dark corridors are maintained and that key ecological features remain unlit. At present, it is unclear whether the proposal has been supported by sufficient ecological information.

In line with the precautionary principle established under the Habitats Regulations, where there is a risk of significant adverse effect on a protected species or its habitat, the proposal should not proceed in the absence of robust evidence demonstrating no harm to the integrity of the Sussex SAC and associated bat flightpaths.

The proposal should be resisted in the absence of clear evidence that:

- Light levels along all retained habitat corridors will remain below 0.5 lux
- No illumination will affect adjacent woodland or boundary vegetation
- The integrity of bat commuting routes will be preserved



Date: 11 December 2025

Our ref: 12112

[REDACTED]
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

By email only: Planning Department, planning@horsham.gov.uk

Thank you for requesting advice on this discharge of condition 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: [REDACTED]
Location: Sleepy Warren Maydwell Avenue Slinfold Horsham
Proposal: [REDACTED]

Thank you for re-consulting Place Services on the above discharge of condition application. We can only comment on condition 8, which is related to ecology.

Conditions

Condition 8: Further Information Required

"Pre-Occupation Condition: The development hereby permitted shall not be first occupied until a lighting design scheme for biodiversity has been submitted to and approved in writing by the Local Planning Authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.

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 Local Planning Authority 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 (Priority habitats & species) and Policy 31 of the Horsham Development Framework.

Comments

We have reviewed the submitted plans and product specification documents, which have been submitted in order to discharge Condition 8. This includes the newly submitted Proposed Garden Layout (SGD, January 2025). Additionally, we have reviewed the ecological consultation comments provided with the original consultation (DC/22/0370, varied with application DC/24/1184), to ensure no bat flight lines will be impacted by the lighting proposals.

The bat HRA Appropriate Assessment (Place Services, 18 December 2023) requires the implementation of an ecologically sensitive lighting scheme to avoid adverse effect on the integrity of The Mens SAC. The specification for the lighting should comply with Bat Conservation Trust and the Institution of Lighting Professionals, including the measures recommended by GN:08/23 (ILP) was recommended in the Update Walkover and GCN Survey (May 2023) submitted to support the consent granted under DC/22/0370.

The site is bordered by trees and woodland. Our original consultation comments stated *“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. If external lighting is required and, as Barbastelle bats may use this habitat, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Update Walkover and GCN Survey (May 2023)) to avoid impacts from light disturbance”*.

The Proposed Garden Layout (SGD, January 2025) now show the product type and light location and direction. The document also includes images of contour plans for each light; however, these images do not contain any relevant information to indicate the levels of light spill on the surrounding areas, such as lux levels along the contour plan. **The northern and eastern boundaries appear to have the highest suitability for use by foraging and commuting bats, with those locations being bordered by hedgerows which connect in the wider landscape to woodland. On the north facing side of the garage three wall mounted lights are proposed at a height of 1.8 metres, facing the boundary vegetation. It is not clear why so much lighting is proposed in this specific location. The high height of the lighting in this location is considered likely to impact bats using this vegetation for commuting or foraging. We recommend either the lighting levels along the northern side of the proposed garage are reduced, with the height amended to reduce the levels of light spill on boundary vegetation or the lighting in this location be removed entirely. Alternatively, the contour plans should be**

updated to include lux lines, which show levels on boundary vegetation will not be above 0.5lux, as per best practice guidance GN:08/23 from the Institute of Lighting Professionals¹.

Furthermore, along the eastern boundary several bollards at 1.1m height are proposed to line the road access. Generally, as per best practice guidance GN:08/23 from the Institute of Lighting Professionals, bollards are not recommended due to issues with this lighting type and the height and their impact on bats. We have reviewed the proposed product and specification; we are satisfied this type of bollard will not allow upward illumination and only delivers a low level of lumen and an appropriate light warmth. The bollards also face away from the ecologically sensitive habitats, rather than illuminating the habitat. As such we are satisfied these lighting types are appropriate for this location.

Further information as detailed above relating to lighting is required before we can recommend discharge of this condition.

Recommendation

[REDACTED]

[REDACTED]

[REDACTED]

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.

¹ <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

I respectfully request that the Local Planning Authority gives full consideration to these points and ensures that the proposal is subject to appropriate ecological assessment, including, where necessary, a Habitats Regulations Assessment.

Summary of Key Objections:

- The proposed lighting would operate from 05:00, exacerbating early-morning noise from idling vehicles, vehicles and constant use of truck horns, which already occurs from 06:00, and would be detrimental to neighbouring residential amenity.
- The installation of 8 metre high floodlighting is inconsistent with previously approved ecological safeguards, including the removal of low-level lighting to protect bat habitat.
- The proposal threatens established bat flightpaths and commuting routes along the woodland edge, compromising habitat connectivity and the integrity of the Sussex SAC.
- In the absence of robust evidence demonstrating no adverse impact, the proposal fails to meet the precautionary principle under the Habitats Regulations.

Attached: Place Services letter of 11 Dec detailing Barbastelle bats location for foraging and commuting