



Shazia Penne
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

Our ref: 16775
Date: 07 May 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 re-consulting Place Services on the above application.

No ecological objection	☐
No ecological objection subject to attached conditions	☐
Further information required/Temporary holding objection: • European Protected Species – bats	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☒

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

- 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 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 are no longer satisfied that there is sufficient ecological information available for determination of this application and recommend that details of survey results, mitigation and enhancement measures for bats are provided prior to determination. The reasons for this are outlined below:

European Protected Species: bats

We understand from the Preliminary Ecological Appraisal Report Revision 3 (Urban Edge Environmental Consulting, April 2026) that the previous two dusk emergence bat surveys in July and August 2024 recorded no bats emerging from buildings B1 (main house) and OB2 (flat roofed garage). However, this survey data is out of date to support this application, in line with CIEEM Guidance¹ and paragraph 6.2.1 of British Standard (BS) BS42020 'Biodiversity – Code of practice for planning and development 2013'. As these two buildings will be demolished, we agree that further surveys for roosting bats need to be undertaken as recommended in Section 5.2.2 of the Preliminary Ecological Appraisal Report Revision 3 (Urban Edge Environmental Consulting, April 2026).

¹ CIEEM (2019) Advice note on the Lifespan of Ecological Reports and Surveys - <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

We also 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 additional surveys are in accordance with [Government Standing Advice](#) which says that you should ask for a survey if:

- *distribution and historical records suggest bats may be present*
- *the development site includes or is close to [any built structures](#), on or underground, that provide commuting, foraging or roosting opportunities for bats*
- *the development site includes or is close to [trees](#), shrubs, rock formations, quarries, natural cliff faces or water bodies that provide commuting, foraging or roosting opportunities for bats*

The survey information 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.

Additional comments

We 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 these buildings are required.

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 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.

It is recommended in the Biodiversity Mitigation and Enhancement Plan Revision 3 (Urban Edge Environmental Consulting, April 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 (Biodiversity Mitigation and Enhancement Plan Revision 3 (Urban Edge Environmental Consulting, April 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.

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 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.

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 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 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.