Place Services
Essex County Council
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Date: 7 October 2026
Our ref: 22559

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Horsham District Council
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By email only: 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/26/0567
Location: 9 Montpelier Gardens Washington West Sussex RH20 3BW
Proposal: "Erection of 2no. semi-detached houses on land to the side of 9 Montpelier Gardens. Demolition of single storey element to side of existing No. 9 and erection of a two storey rear extension to the host dwelling."

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	☐
Recommend refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐

Summary

We have reviewed the Bat Emergence and Re-Entry Survey (DRPJ Limited, August 2026) and Preliminary Ecological Appraisal & Preliminary Roost Assessment (Arbtech Consulting Ltd., March 2026) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We have additionally, now reviewed the Rebuttal Letter (DRPJ Limited, 9th September 2026).

We are satisfied that there is sufficient ecological information available to support determination of this application.

The Rebuttal Letter (DRPJ Limited, 9th September 2026) has addressed our previous concerns regarding potential impacts upon roosting bats in trees and has confirmed there will be no direct or indirect impacts to any trees.

We note from the Bat Emergence and Re-Entry Survey (DRPJ Limited, August 2026) that the survey in August 2026 on Building B1 (two-storey residential building) concludes that no emergences of bats or bat roosts were observed during the visit. In addition, we note from the Preliminary Ecological Appraisal & Preliminary Roost Assessment (Arbtech Consulting Ltd., March 2026) that Buildings B2 and B3 (timber-framed outbuildings) will be demolished, but both have negligible bat roost potential. Therefore, we agree that no further surveys for bats are required for buildings. However, we support demolishing these buildings between November and March to avoid impacts on bats (page 15 of the Preliminary Ecological Appraisal & Preliminary Roost Assessment (Arbtech Consulting Ltd., March 2026)). This needs to be secured by a condition of any consent and implemented in full.

The site lies approximately 12.4km east of The Mens Special Area of Conservation (SAC) (MAGIC maps) and therefore lies outside within the 12km Wider Conservation Area for The Mens SAC. Therefore, a project level Habitats Regulations Assessment (HRA) will not be required.

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.

We support the Precautionary Method Statement for mobile protected and Priority species (including Hedgehog, which is a threatened and Priority species) in the Other e.g. small mammals Section of the Preliminary Ecological Appraisal & Preliminary Roost Assessment (Arbtech Consulting Ltd., March 2026). This is necessary to conserve and enhance protected and Priority species particularly those recorded in the locality.

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.

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 Preliminary Ecological Appraisal & Preliminary Roost Assessment (Arbtech Consulting Ltd., March 2026) *as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.*

This may 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 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 in line with the recommendations of the Preliminary Ecological Appraisal & Preliminary Roost Assessment (Arbtech Consulting Ltd., March 2026), 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).

3. 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, 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
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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.

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.