



Date: 17 September 2026

Our ref: 21632

Jacques Burrows
Horsham District Council
Parkside,
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Horsham,
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RH12 1RL

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/26/1072
Location: Land South Of Renvyle Okehurst Lane Billingshurst West Sussex RH14 9HR
Proposal: Construction of a replacement barn building.

Thank you for 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 Preliminary Roost Assessment (ROAVR, June 2026) and Ecological Impact Assessment (ESL Ltd., October 2025), relating to the likely impacts of development on designated sites, protected and Priority species and habitats and the identification of

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

We are not satisfied that there is sufficient ecological information available for determination of this application and recommend that additional information on bats is provided prior to determination.

European Protected Species: bats

We note that it appears from the Design & Access Statement (submitted July 2026) that the collapsed barn has remained *in situ* and will, presumably, be demolished for the replacement barn. The Ecological Impact Assessment (ESL Ltd., October 2025) states that any buildings onsite were examined for use by bats and the Preliminary Roost Assessment (ROAVR, June 2026) states in Section 1.3 that one of the aims was to assess potential for roosting bats within the existing building. However, the outcomes of these assessments do not appear to be reported in either of these documents. Therefore, we request clarification as to whether the buildings onsite have been assessed for impacts to roosting bats.

In addition, we note that the redline boundary in the Preliminary Roost Assessment (ROAVR, June 2026) and Ecological Impact Assessment (ESL Ltd., October 2025) does not appear to include the access road to the north of the site shown in the Horsham District Council Planning Portal red line boundary. As the Arboricultural Impact Assessment & Method Statement Version 1.1 (ROAVR, June 2026) states in Section 3 that T5 (Honey locust), T6 (Ash), T7 (Cherry Plum) and T8 (Cherry Plum) will require crown lifts over the drive, we request clarification as to whether these trees have been subject to a Ground Level Tree Assessment for roosting bats.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, which are European Protected Species. These surveys are required prior to determination because [Government Standing Advice](#) indicates that you should “*Survey for bats if the area includes buildings or other structures that bats tend to use or there are trees with features that bats tend to use nearby*”.

The results of these surveys are 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.

Furthermore, the Local Planning Authority, as a competent authority, should have regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) when reaching planning decisions including the Favourable Conservation Status licensing test and must not leave this until the licence application stage. Therefore, if a European Protected Species Mitigation Licence is required for this application, appropriate mitigation measures to support the provision of the licence must also be outlined prior to determination to allow certainty to the LPA that a licence will likely be granted.

This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).

Additional comments

The site lies approximately 4.8km northeast of The Mens Special Area of Conservation (SAC) ([MAGIC maps](#)) and is therefore within the 6.5km Key Conservation Area for this SAC. Within this area all impacts must be assessed as habitats within this zone are considered critical for sustaining the populations of bats within the SACs (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The qualifying feature of the SAC is Barbastelle bat, but there are no records for this species within 2km of the site (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 25 records of bats within 2km of the site, including Common Pipistrelle and Brown Long-eared bat (SxBRC). The site also lies approximately 10.0km east of Ebernoe Common Special Area of Conservation (SAC) and therefore lies inside the 12.0km Wider Conservation Area for this SAC. We note there is one record for Bechsteins bat approximately 1.6km southwest, recorded in 2009. No European Protected Species Mitigation Licences have been granted within 2km of the site ([MAGIC maps](#)). The site lies approximately 10.0km north of Arun Valley SAC, SPA and Ramsar site.

We understand from the submitted documents that the 0.17ha site comprises modified grassland, scattered trees, a dwelling, agricultural buildings and associated hardstanding, tracks and working areas. Nine new native trees will be planted on site and a five-metre length of new native species hedgerow will be planted along the east boundary to connect with existing native hedgerows. Existing hedgerows and three trees will be retained and areas of neutral and modified grassland will be created.

If external lighting is required, and as Barbastelle bat may use the onsite habitat, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Roost Assessment (ROAVR, 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 also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Ecological Impact Assessment (ESL Ltd., October 2025) to secure net gains for biodiversity, as outlined under the National Planning Policy Framework (August 2026) N2 Part F. The reasonable biodiversity enhancement measures need to be outlined within a separate Biodiversity Enhancement Layout and 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.

Please note that 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 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 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.

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.

AI may have been used in the preparation of this response, but its 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.