17 October 2024

Alice Johnson
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

By email only

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. 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: **DC/24/1433**
Location: **Goffsland Farm Coolham Road West Chiltington West Sussex RH20 2LT**
Proposal: **External alterations to building 'C', new roller shutters on building 'D', re-siting of mobile home and new fencing along the front boundary.**

Dear Alice,

Thank you for consulting Place Services on the above application.

Recommended Temporary Holding Objection	
No ecological objections	
Recommended Approval subject to attached conditions	Yes
Recommended Discharge of condition	
Subject to Natural England's formal comments on the conclusion of the Water Neutrality Appropriate Assessment	Yes
Subject to Natural England's formal comments on the conclusion of the Bat Appropriate Assessment	Yes

Please note that following receipt of Natural England's position statement on developments in the Sussex North Water Supply Zone, decisions on planning applications should await the completion of a Sussex North water neutrality strategy.

Summary

We have reviewed the submitted documents, including the Bat Survey Report (Deepdene Ecology Ltd., July 2024) and Preliminary Ecological Appraisal (Deepdene Ecology Ltd., June 2024), relating to the likely impacts of development on protected & Priority species and habitats, and identification of proportionate mitigation. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We note that a single emergence survey for bats was undertaken on the Building C (brick built building) in June 2024 and the Bat Survey Report (Deepdene Ecology Ltd., July 2024) concludes that no evidence of roosting bats was detected. Building D (metal barn) has negligible bat roost potential, Building E (mobile home) does not offer any suitable roosting locations, no works are proposed for Buildings A and B and we understand that no trees will be removed for the development (Preliminary Ecological Appraisal (Deepdene Ecology Ltd., June 2024)). We therefore agree that no further surveys for bats are required.

The site lies approximately 9.0km southeast of The Mens Special Area of Conservation (SAC) and the site is therefore within the 12.0km Wider Conservation Area for the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The qualifying feature for The Mens SAC is Barbastelle bats, but this species has not been recorded within 2km of the site (MAGIC maps and Sussex Biodiversity Record Centre – accessed under licence). There are approximately 12 records of bats within 2km of the site, including Common Pipistrelle, Soprano Pipistrelle, Serotine and Brown Long-eared bat. One European Protected Species Mitigation Licence was granted for Common Pipistrelle and Brown Long-eared bat 1.9 km to the southeast of the site in 2016.

The site lies approximately 14.3km southeast of Ebernoe Common Special Area of Conservation (SAC) and the site is therefore outside the within the 12km Wider Conservation Area for this SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 4.7km northeast of Arun Valley SAC, SPA and Ramsar.

We understand from the submitted documents that the site comprises part of the wider Goffsland Farm, including a central area of hardstanding yard and several buildings. The site is surrounded by blocks of deciduous woodland and farmland. We understand that the trees and hedgerow within the site will be retained, with planting up of the hedgerow gaps, and native tree planting will be undertaken on the southern boundary of the site. In addition, we understand from the Planning Statement (White & Sons, July 2024) that a native hedge will be planted behind the fencing on the western (front) boundary. 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 Report (Deepdene Ecology Ltd., July 2024) that a sensitive lighting scheme is implemented for this application to mitigate against the increase in light measures following Bat Conservation Trust advice and The Institution of Lighting Professionals.

As there is a potential for habitat fragmentation from light spill of potentially functionally linked land for Barbastelle bats, this has been screened in and will need to be considered at Stage 2 Appropriate Assessment of the LPA's project level Habitats Regulations Assessment (HRA).

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 Report (Deepdene Ecology Ltd., July 2024) 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.

As the site has low potential to support reptiles and amphibians, such as Common Toad (Priority species), a small amount of scrub will be removed, we support the Precautionary Method Statement for reptiles and amphibians in Section 9.3 of the Preliminary Ecological Appraisal (Deepdene Ecology Ltd., June 2024). This should be secured by a condition of any consent and implemented in full.

We have no objections on ecological matters excluding Great Crested Newt. We have been instructed to leave comments on this European Protected Species to the NatureSpace Partnership.

We also support the proposed reasonable biodiversity enhancements in Section 10.2 of the Preliminary Ecological Appraisal (Deepdene Ecology Ltd., June 2024), which have been recommended to secure measurable net gains for biodiversity, as outlined under Paragraph 180d of the National Planning Policy Framework (December 2023). The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Layout and should be secured by a condition of any consent for discharge prior to beneficial use.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

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 and enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (Deepdene Ecology Ltd., June 2024), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. This includes the Precautionary Method Statement for reptiles and amphibians in Section 9.3 of the Preliminary Ecological Appraisal (Deepdene Ecology Ltd., June 2024), which avoids impacts on 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 and enhance 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) and Policy 31 of the Horsham Development Framework.

2. **PRIOR TO BENEFICAL USE: BIODIVERSITY ENHANCEMENT LAYOUT**
   "A Biodiversity Enhancement Layout, providing the finalised details and locations of the enhancement measures contained within the Preliminary Ecological Appraisal (Deepdene Ecology Ltd., June 2024) shall be submitted to and approved in writing by the local planning authority.

   The enhancement measures shall be implemented in accordance with the approved details prior to occupation and all features shall be retained in that manner thereafter."

   Reason: To enhance protected and Priority species & habitats and allow the LPA to discharge its duties under the NPPF 2023 and s40 of the NERC Act 2006 (as amended).

3. **PRIOR TO BENEFICIAL USE: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**
   "*A lighting design scheme for biodiversity shall be 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, Isolux drawings 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 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) and Policy 31 of the Horsham Development Framework.

Please contact us with any queries.

Yours sincerely,

Genevieve Broad MCIEEM MSc BSc (Hons)
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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.