



Date: 20 February 2026

Our ref: 13558

Alice Johnson
Horsham District Council
Parkside
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/25/2121
Location: Old House Manor Estate Cowfold Road Coolham West Sussex RH13 8QL
Proposal: Conversion of existing manor house into 14no. residential units. (Retrospective).

Thank you for consulting Place Services on the above retrospective application.

No ecological objection	☐
No ecological objection subject to attached conditions	☒
Further information required/Temporary holding objection	☐
Recommend Refusal	☐
Subject to Natural England's 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 documents supplied by the applicant, relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification

of proportionate mitigation. Unfortunately, no information has been submitted in relation to ecology. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We note from the Supporting Planning & Design and Access Statement (N.J.A. Town Planning Ltd., November 2025) and Cover Letter (Dedman Lettings Ltd., December 2025) that the works to refurbish the former retreat centre comprised installing small kitchenettes to the en-suite rooms. Therefore, we consider that bats are unlikely to have been impacted by the works.

The site lies approximately 9.7km east of The Mens Special Area of Conservation (SAC) and 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 of the SAC is Barbastelle bat, there are two records for this species recorded within 2km of the site, located approximately 800metres northeast. One European Protected Species Mitigation Licences has been granted within 2km of the site, approximately 615m to the east for Common pipistrelle and Brown Long-eared bat in 2013 ([MAGIC maps](#)). There are approximately 40 records of bats within 2km of the site, including Brown Long-eared Bat, Whiskered, Soprano and Common Pipistrelle (Sussex Biodiversity Record Centre – accessed under licence).

The site lies approximately 14.3km southeast of Ebernoe Common SAC and therefore lies outside the 12km Wider Conservation Area for this SAC. The site lies approximately 8.0km northeast of Arun Valley SAC, SPA and Ramsar site.

We understand from the submitted documents that the site comprises only the Old House Manor and access track and it appears that there are no hedgerows or trees onsite. Therefore, there has been no severance to the flight lines of foraging or commuting bats from the SAC and habitat connectivity within the site has been maintained.

We therefore believe there has been no Adverse Effect on Integrity of the bat SAC. We advise the LPA to prepare a project level HRA Screening Report to record its decision and retain on file.

If external lighting is required, and as Barbastelle bat may use the onsite habitat, we recommend that the use of external light should be avoided or minimised 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 are satisfied that there is sufficient ecological information available for determination of this retrospective application. We have no objections on ecological matters excluding Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the [NatureSpace Partnership](#).

We recommend that reasonable biodiversity enhancements for protected, Priority and threatened species should be identified by a suitably qualified ecologist and implemented to secure net gains for biodiversity, as outlined under Paragraph 187d and 193d of the National Planning Policy Framework (December 2024). The reasonable biodiversity enhancement measures need to be outlined within a separate Biodiversity Enhancement Strategy and secured by a condition of any consent.

Recommended conditions

1. WITHIN THREE MONTHS OF CONSENT: BIODIVERSITY ENHANCEMENT STRATEGY

“Prior to any works above slab level, a Biodiversity Enhancement Strategy for protected and Priority or threatened species, prepared by a suitably qualified ecologist, shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Enhancement Strategy shall include the following:

- Purpose and conservation objectives for the proposed enhancement measures;*
- detailed designs or product descriptions to achieve stated objectives;*
- locations of proposed enhancement measures by appropriate maps and plans (where relevant);*
- persons responsible for implementing the enhancement measures; and*
- 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 enhance protected and Priority species & habitats and allow the LPA to discharge its duties under paragraph 187d of NPPF 2024 and s40 of the NERC Act 2006 (as amended).

If external lighting is required

2. **WITHIN THREE MONTHS OF CONSENT: 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 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 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.

