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Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

Our ref: 18270
Date: 23 June 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/26/0149
Location: Oakwood Farm Storrington Road Thakeham West Sussex RH20 3QT
Proposal: Erection of a chalet style (self-build) dwelling.

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: • Protected species (reptiles)	☒
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 Ecological Appraisal (Arun Ecology Ltd., December 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 details of survey results, mitigation & enhancement measures for bats are required to make this proposal acceptable prior to determination. The reason for this is outlined below:

Protected Species: reptiles

We note that the Preliminary Ecological Appraisal (Arun Ecology Ltd., December 2025) recommends that surveys for reptiles need to be undertaken over seven survey visits. This is because there are records for Slow Worm, Grass Snake, Adder and Common Lizard within 1km of the site and the habitats on site, and adjacent to the site, are suitable to support reptiles.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for reptiles, which are protected Species. These surveys are required prior to determination because [Government Standing Advice](#) indicates that you should ask for a survey if:

- *distribution and historical records suggest reptiles may be present*
- *the development proposal is likely to lead to harm to individual reptiles or their habitats*
- *suitable habitat is present at the development site that could support reptiles*

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

We note from the Preliminary Ecological Appraisal (Arun Ecology Ltd., December 2025) that there are no structures or trees within the red line boundary. Therefore, we agree that no further surveys for bats are required.

The site lies approximately 9.6km southeast of The Mens Special Area of Conservation (SAC) and is therefore within the 12.0km Wider Conservation Area for the SAC within which significant impacts or severance to flightlines must be considered. This is because the Wider Conservation Area is the full extent of the range of foraging areas required by Barbastelle bats, which are the qualifying feature of the SAC. There is one record for this species within 2km of the site, located approximately 1.2km south (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 80 records of bats within 2km of the site, including Serotine, Daubenton's, Common Pipistrelle, Brown Long-eared Bat (SxBRC). Two European Protected Species Mitigation Licences have been granted within 2km of the site: a) 1.4km to the northeast for Brown Long-eared bat and Common Pipistrelle in 2016; and b) 1.4km to the east for Brown Long-eared bat in 2017 ([MAGIC maps](#)).

The site lies approximately 15.4km southeast of Ebernoe Common SAC and therefore lies 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 4.3km east of Arun Valley SAC, SPA and Ramsar site. We understand from the submitted documents that the site comprises modified grassland, a driveway, and developed land sealed surface. 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.

We support the implementation of the Precautionary Method Statement for mobile protected and Priority species (including Hedgehog, which is a Priority and threatened species) in Sections 5.5.1 and 5.5.6 of the Preliminary Ecological Appraisal (Arun Ecology Ltd., December 2025). This needs to be secured by a condition of any consent and implemented in full.

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 Ecological Appraisal (Arun Ecology Ltd., December 2025) 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 Preliminary Ecological Appraisal (Arun Ecology Ltd., December 2025) 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 should be outlined within a separate Biodiversity Enhancement Layout and should 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 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

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.