



Date: 11 December 2025

Our ref: 12112

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By email only: Planning Department, planning@horsham.gov.uk

Thank you for requesting advice on this discharge of condition 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: DISC/25/0242
Location: Sleepy Warren Maydwell Avenue Slinfold Horsham
Proposal: "Application for Approval of Details Reserved by Conditions 6, 8, 9, 11, 12 and 13 to approved application DC/24/1184"

Thank you for re-consulting Place Services on the above discharge of condition application. We can only comment on condition 8, which is related to ecology.

Conditions

Condition 8: Further Information Required

"Pre-Occupation Condition: The development hereby permitted shall not be first occupied until a lighting design scheme for biodiversity has been 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 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 Local Planning Authority 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 (Priority habitats & species) and Policy 31 of the Horsham Development Framework.

Comments

We have reviewed the submitted plans and product specification documents, which have been submitted in order to discharge Condition 8. This includes the newly submitted Proposed Garden Layout (SGD, January 2025). Additionally, we have reviewed the ecological consultation comments provided with the original consultation (DC/22/0370, varied with application DC/24/1184), to ensure no bat flight lines will be impacted by the lighting proposals.

The bat HRA Appropriate Assessment (Place Services, 18 December 2023) requires the implementation of an ecologically sensitive lighting scheme to avoid adverse effect on the integrity of The Mens SAC. The specification for the lighting should comply with Bat Conservation Trust and the Institution of Lighting Professionals, including the measures recommended by GN:08/23 (ILP) was recommended in the Update Walkover and GCN Survey (May 2023) submitted to support the consent granted under DC/22/0370.

The site is bordered by trees and woodland. Our original consultation comments stated *“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. If external lighting is required and, as Barbastelle bats may use this habitat, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Update Walkover and GCN Survey (May 2023)) to avoid impacts from light disturbance”*.

The Proposed Garden Layout (SGD, January 2025) now show the product type and light location and direction. The document also includes images of contour plans for each light; however, these images do not contain any relevant information to indicate the levels of light spill on the surrounding areas, such as lux levels along the contour plan. The northern and eastern boundaries appear to have the highest suitability for use by foraging and commuting bats, with those locations being bordered by hedgerows which connect in the wider landscape to woodland. On the north facing side of the garage three wall mounted lights are proposed at a height of 1.8 metres, facing the boundary vegetation. It is not clear why so much lighting is proposed in this specific location. The high height of the lighting in this location is considered likely to impact bats using this vegetation for commuting or foraging. We recommend either the lighting levels along the northern side of the proposed garage are reduced, with the height amended to reduce the levels of light spill on boundary vegetation or the lighting in this location be removed entirely. Alternatively, the contour plans should be

updated to include lux lines, which show levels on boundary vegetation will not be above 0.5lux, as per best practice guidance GN:08/23 from the Institute of Lighting Professionals¹.

Furthermore, along the eastern boundary several bollards at 1.1m height are proposed to line the road access. Generally, as per best practice guidance GN:08/23 from the Institute of Lighting Professionals, bollards are not recommended due to issues with this lighting type and the height and their impact on bats. We have reviewed the proposed product and specification; we are satisfied this type of bollard will not allow upward illumination and only delivers a low level of lumen and an appropriate light warmth. The bollards also face away from the ecologically sensitive habitats, rather than illuminating the habitat. As such we are satisfied these lighting types are appropriate for this location.

Further information as detailed above relating to lighting is required before we can recommend discharge of this condition.

Recommendation

We are still unable to recommend the discharge of condition 8 until the additional information outlined above has been provided.

Please do not hesitate to contact us if you have any queries in relation to this advice.

Hayley Dean MCIEEM MSc BSc (Hons)
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 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.

¹ <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>