**Place Services**
Essex County Council
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**www.placeservices.co.uk**

Date: 20 October 2026 Our ref: 22820

Sam Nye
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

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

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*Thank you for requesting advice on this permission in principle 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.*

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**Application:** **DC/26/1419**
**Location:** **Blackthorn Bungalow Five Oaks Road Slinfold Horsham West Sussex RH13 0RL**
**Proposal:** **Permission in Principle for the demolition of Blackthorn Bungalow and the erection of a minimum and maximum of one dwellinghouse.**

Thank you for consulting Place Services on the above Permission in Principle application.

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| **No ecological objection subject to submission at Technical Details consent stage of information on Designated sites (Habitats sites), European Protected Species (bats) and protected species (reptiles and mobile protected species)** | ☒ |
| **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** | ☐ |

**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 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.

**Designated sites (Habitat sites)**

The site lies approximately 9.4km northeast of The Mens Special Area of Conservation (SAC) and is therefore within the 12km 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, approximately 1.9km southwest (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 103 records of bats within 2km of the site, including Serotine, Common Pipistrelle, Natterers and Brown Long-eared Bat (SxBRC). One European Protected Species Mitigation Licence has been granted within 2km of the site, at 1.4km to the north for Brown Long-eared bat in 2017 (MAGIC maps). The site lies approximately 14.2km southeast of Ebernoe Common SAC and therefore outside the Wider Conservation Zone for this SAC and lies approximately 13.2km north of Arun Valley SAC, SPA and Ramsar site.

**European Protected Species: bats**

At the Technical Details stage, we recommend that a Preliminary Ecological Appraisal (PEA) of the site and Preliminary Roost Assessment (PRA) for bats on the building to be demolished are undertaken. In addition, we highlight that if trees are to be removed for the development, then a Ground Level Tree Assessment needs to be undertaken to assess any likely impact to roosting bats in accordance with the 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023). Details of survey methods, results, mitigation and enhancement measures are required to make this proposal acceptable.

**Protected species: reptiles and mobile protected species**

It is unclear if any trees or hedgerows will be removed for the development. However, if this is the case, then reptiles and mobile protected species may be impacted as the base of hedgerows provide suitable habitat for these species.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, which are European Protected Species, and protected species and

habitats. These surveys are required prior to determination because Government Standing Advice for bats 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*". Government Standing Advice for reptiles indicates you should ask for a survey if:

- *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).

**Irreplaceable habitat**

In addition, Toat Copse ancient woodland (irreplaceable habitat) lies immediately adjacent to the north of the site and therefore a 15m buffer is required between the site and the woodland (Government Standing Advice). We recommend that details of the precautions to be taken to protect the ancient woodland are submitted to the LPA prior to determination of this application.

We recommend that any external lighting is sensitive to wildlife and secured by a condition of any consent to avoid impacts to foraging and commuting bats. This must follow the Guidance Note 8 Bats and artificial lighting (The Institute of Lighting Professionals & Bat

Conservation Trust). In summary, it is highlighted that the following measures should be implemented for the lighting design, which could be informed by a professional ecologist:

- 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.

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 at Technical Details consent Stage 2 to support a lawful decision.

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 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.*