**Place Services**
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
**www.placeservices.co.uk**

Date: 20 October 2026 Our ref: 22816

Daniel Holmes
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 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/26/1463**
**Location:** **The Green Goose Green Lane Goose Green West Sussex RH20 2LW**
**Proposal:** **Conversion of building to a single dwellinghouse, installation of front door and front, rear and side windows.**

Thank you for consulting Place Services on the above application.

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|---|---|
| **No ecological objection** | ☐ |
| **No ecological objection subject to attached conditions** | ☐ |
| **Further information required/Temporary holding objection on:**<br>• **European Protected Species (bats)** | ☒ |
| **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.

**European Protected Species: bats**

This is because we note from the Planning Statement (MME Planning Services, September 2026) that the 'White Stable' building will be converted to a dwelling. Therefore, we recommend that a Preliminary Roost Assessment should be undertaken in order to assess any impact to bats and the need for any mitigation measures.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, which are European Protected Species. These surveys are required prior to determination because Government Standing Advice 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*".

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 understand from the Application Form that there are no trees on site and therefore no surveys are required for bats and trees.

The site lies approximately 9.6km southeast 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. However, there are no records for this species within 2km of the site (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 28 records of bats within 2km of the site, including Serotine, Common Pipistrelle, Nathusius and Brown Long-eared Bat (SxBRC). Two European Protected Species Mitigation Licences have been granted within 2km of the site: a) 1.7km to the east for Common Pipistrelle bat in 2017; and b) 1.4km to the west for Brown Long-eared in 2017 (MAGIC maps). The site lies approximately 15.2km southeast of Ebernoe Common SAC and therefore outside the Wider Conservation Zone for this SAC and lies approximately 5.8km east of Arun Valley SAC, SPA and Ramsar site.

We understand from the submitted documents that the site comprises one building, a hardstanding area and access from Peacock Lane to the west and that no hedgerows or trees will be removed.

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.

We also recommend that reasonable biodiversity measures for protected, Priority and threatened species should be identified by a suitably qualified ecologist and implemented to secure net gains for biodiversity, as outlined in the National Planning Policy Framework (August 2026) N2 Part F. The reasonable biodiversity measures need to be outlined within a separate Biodiversity Measures Strategy and secured by a condition of any consent.

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 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
Email: PlaceServicesEcology@essex.gov.uk

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.*