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Our ref: 12152
Date: 7 January 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. 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/25/1871
Location: Town House Farm Guildford Road Clemsfold West Sussex
Proposal: Remodelling and extension of existing open sided barn to form new garage.

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	☐
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the Bat HRA (Screening Only)	☒

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 Bat Scoping and Emergence Survey Report (The Ecology Co-Op, October 2025) and the Bat Scoping Report and Preliminary Ecological Appraisal (The Ecology Co-Op, June 2025) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures.

Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We are satisfied that there is sufficient ecological information available to support determination of this application.

We highlight that the site lies approximately 10.5km from The Mens Special Area of Conservation (SAC) for which one of the qualifying features is Barbastelle bats. The site therefore lies within the 12km Wider Conservation Area for the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol and may be within the range of foraging areas required by the bats. This is the full extent of the range of foraging areas required by the bats and any significant impacts or severance to flightlines need to be considered. There are no records of this species within 2km of the site (MAGIC maps and Sussex Biodiversity Record Centre – accessed under licence). There are approximately 22 records of bats within 2km of the site, including common bat species. Three European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site (MAGIC maps). The nearest is from 2019 for Brown Long-eared, Common, Nathusius and Soprano Pipistrelle. No licences for Barbastelle were returned.

The site lies approximately 14.8km east of Ebernoe Common Special Area of Conservation (SAC) and the site therefore lies outside of the 12km Wider Conservation Area for this SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 16.1km north of Arun Valley SAC, SPA and Ramsar site.

We note no trees are proposed to be removed and the proposals are for a remodelling and extension, with other identified bat roost features/ roosts to be retained on the main house and barn. As no treelines or hedgerows will be affected by the proposal, we advise that the LPA can record a decision of no Likely Significant Effect on the Sussex bat SACs in its project level HRA report.

The submitted Bat Scoping and Emergence Survey Report (The Ecology Co-Op, October 2025) has assessed all buildings present on site, with emergence surveys identifying day roosts for Brown Long-eared Bat, Natterers Bat, Soprano and Common Pipistrelle. With the roosts located within the main house and the barn adjacent to the building proposed for extension. Given no bats were found to be roosting within the portion of the building to be

impacted, we are satisfied with the recommendation within Section 5.5 "*With the adoption of careful works and sensitive timing the current proposed development will not have impact upon the common pipistrelle day roosts that are present at Town House Farm. If these plans are changed in any away a licensed ecologist must be consulted to provide an updated assessment, and an EPS Licence may be required for this development to proceed. If any bats or other protected species are found during the development, work should be stopped immediately, and an ecologist must be contacted for advice*." Given there are several roosting bats present on site, and the building to be impacted does have bat roost potential, we recommend the proposed precautionary works are detailed within a non-licenced bat method statement, with a pre-works check carried out by a suitably licenced ecologist. The method statement should include details of a toolbox talk and what to do if a bat is encountered.

We would like to highlight the submitted reports appear to relate to works to the main house, rather than the open sided barn. Works to the main house are not considered as part of this application and any works to that building would require a European Protected Species Mitigation Licence. However, as stated above, the document does also assess the impacts upon the open sided barn, so we are satisfied there is sufficient information.

As Barbastelles may use this site for foraging and commuting, we also support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Appendix 4 of the Bat Scoping and Emergence Survey Report (The Ecology Co-Op, October 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 beneficial use, 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.

This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

The mitigation measures identified in the Bat Scoping and Emergence Survey Report (The Ecology Co-Op, October 2025) should be secured by a condition of any consent and implemented in full. This is necessary to conserve and enhance protected and Priority species particularly those recorded in the locality.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 187d and 193d of the National Planning Policy Framework (December 2024). Reasonable biodiversity enhancement measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Enhancement Strategy to be secured as a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).

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.

Impacts will be minimised such that the proposal is acceptable, subject to the conditions below based on BS42020:2013. We recommend that submission for approval and implementation of the details below should be a condition of any planning consent.

Recommended conditions

1. **ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS**
   "All mitigation measures and/or works shall be carried out in accordance with the details contained in the Bat Scoping and Emergence Survey Report (The Ecology Co-Op, October 2025) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

   This will include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during

construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

Reason*:* To conserve protected and Priority species and 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).

2. **PRIOR TO COMMENCEMENT: BAT METHOD STATEMENT**

"A Bat Method Statement shall be submitted to and approved in writing by the local planning authority. This will contain precautionary mitigation measures and/or works to reduce potential impacts to bats during the construction phase.

The measures and/works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter."

Reason: *To conserve protected and Priority species and 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).*

3. **PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY**

"Prior to any works above slab level, a Biodiversity Enhancement Strategy for protected, Priority and threatened species, prepared by a suitably qualified ecologist in line with the recommendations of the Bat Scoping and Emergence Survey Report (The Ecology Co-Op, October 2025), shall be submitted to and approved in writing by the local planning authority.

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

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

Condition if external artificial lighting is recommended:

4. **PRIOR TO BENEFICIAL USE: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**

"*Prior to beneficial use, a "lighting design strategy for biodiversity" in accordance with Guidance Note 08/23 (Institute of Lighting Professionals) shall be submitted to and approved in writing by the local planning authority. The strategy shall:*

a) identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and

b) show how and where external lighting will be installed (through provision of appropriate lighting plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

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).

Please 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.*