



Date: 1 May 2026

Our ref: 16767

Bethan Tinning
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

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/26/0357
Location: Land North Of West Wantley Barn Fryern Road Storrington West
Sussex RH20 4BJ
Proposal: Conversion, change of use and alterations and extensions to existing
building to form 1no. detached self-build dwelling and associated
works.

Thank you for re-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 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 and Roost Assessment V1.2 (Arbtech Consulting Ltd., April 2026) and Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., July 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 note that the access to the site indicated on the Location Plan (Ordnance Survey, submitted February 2026) is not shown as within the redline boundary on the planning portal.

We also note from the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., April 2026) that Building B1 (single storey piggery) has negligible bat roost potential and that there are no trees on site. Therefore, we agree that no further surveys are required for bats.

As the site lies approximately 8.9km southeast of The Mens Special Area of Conservation (SAC) ([MAGIC maps](#)), it is within the 12.0km Wider Conservation Area for this SAC. Within this area 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 (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol).

The site lies approximately 14.5km southeast of Ebernoe Common Special Area of Conservation (SAC) and therefore lies outside the 12.0km Wider Conservation Area for this SAC. The site also lies approximately 3.4km east of Arun Valley SAC, SPA and Ramsar site.

There is one record for this species within 2km of the site, approximately 1.5km southeast (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 106 records of bats within 2km of the site, including Serotine, Noctule, Natterers, Common and Soprano Pipistrelle (SxBRC). Two European Protected Species Mitigation Licences have been granted within 2km of the site: a) 1.5km to the southeast for Soprano Pipistrelle bat in 2014; and b) 1.9km to the southwest for Brown Long-eared bat, Common Pipistrelle and Serotine bat in 2015 ([MAGIC maps](#)).

We understand from the submitted documents that the site of approximately 0.08ha comprises an access track, a disused agricultural barn and hard standing with ruderal species, a native species hedgerow and a small area of other neutral grassland. Ancient and semi-natural woodland lies approximately 8m to the east of the site. Native trees will be planted in the wider area and hedgerows will be planted around the site boundaries.

It is recommended in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., April 2026) that a sensitive lighting scheme is implemented for this application to mitigate against the increase in light measures, following Bat Conservation Trust advice and The Institution of Lighting Professionals.

As there is a potential for habitat fragmentation from light spill of potentially functionally linked land for Barbastelle bats, this has been screened in and will need to be considered at Stage

2 Appropriate Assessment of the LPA's project level Habitats Regulations Assessment (HRA).

As Barbastelle may use the onsite habitat, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., April 2026)), 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 therefore consider that, with mitigation, there will be no Adverse Effect on Integrity of the bat SAC. We advise the LPA to prepare a project level HRA Appropriate Assessment to record its decision and consult Natural England on the conclusion.

We also support the non-licensed Precautionary Method Statement for Otter (European Protected Species) on p. 18 of the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., April 2026). This needs to be secured by a condition of any consent and implemented in full.

We also support the Precautionary Method Statement for reptiles (p.13) and mobile protected and Priority species (including Hedgehog, which is a Priority and threatened species) on pp. 17 and 20 of the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., April 2026) which needs to be secured by a condition of any consent and implemented in full.

We note from the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., April 2026) that the site lies within the 15m buffer zone for ancient and semi-natural woodland (irreplaceable habitat) which is located approximately 8m to the east of the

site. We now accept that the development is largely confined to the footprint of previously developed land and support the mitigation measures for notable habitats on p. 7 of the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., April 2026). These measures should be secured by a condition of any consent and implemented in full.

We are now satisfied that there is sufficient ecological information available to support determination of this application. However, 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](#).

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 Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., April 2026) 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, including bats, Otter, reptiles and mobile protected and Priority species.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., April 2026) 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.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended) and delivery of mandatory Biodiversity Net Gain.

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 Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., April 2026) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may 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 ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT LAYOUT

“A Biodiversity Enhancement Layout for biodiversity enhancements listed in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., April 2026) shall be submitted to and approved in writing by the local planning authority.

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

- a) detailed designs or product descriptions for biodiversity enhancements; and*
- b) locations, orientations and heights for biodiversity enhancements on appropriate drawings.*

The enhancement measures shall be implemented in accordance with the approved details prior to occupation and all features shall be retained in that manner thereafter.”

Reason: To enhance protected and Priority species & habitats and allow the LPA to discharge its duties under paragraph 187d of the NPPF 2024 and s40 of the NERC Act 2006 (as amended).

3. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

“Prior to occupation, 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 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 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.*