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

Date: 22 May 2025 Our ref: 04319

Shazia Penne
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

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/24/0505
Location: Champions Farm Storrington Road Thakeham West Sussex
Proposal: Erection of a tractor shed (agriculture).

Thank you for further re-consulting Place Services on the above application.

No ecological objection	☐
Recommend approval 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 Appropriate Assessment	☒
Subject to Natural England's formal comments on the conclusion of the Water Neutrality Appropriate Assessment	☒

Please note that following receipt of Natural England's position statement on developments in the Sussex North Water Supply Zone, decisions on planning applications should await the completion of a Sussex North water neutrality strategy.

Summary

We have reviewed the Ground Level Tree Assessment (Xenia Ecology, May 2025) and Bat Scoping Report (The Ecology Co-op Ltd., November 2023), 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 barn has negligible summer bat roost potential and negligible hibernation potential for bats (Bat Scoping Report (The Ecology Co-op Ltd., November 2023)) and that trees T7 (Poplar) and T14 (Lombardy Poplar) with high bat roost potential will both be retained (Ground Level Tree Assessment (Xenia Ecology, May 2025)). We also note from the Ground Level Tree Assessment (Xenia Ecology, May 2025) that trees T1 (Oak), T2 (Oak), G3 (Apple x 9), T6 (Lombardy Poplar), T6 (Prunus) G13 (Mixed broadleaf), G15 (fruit x 2), G16 (Oak) and G17 (mixed broadleaf) have negligible bat roost potential. Tree T4 (Lombardy Poplar) dead standing trunk has now fallen. We therefore agree that no further surveys for bats are required.

The site lies approximately 9.1km southeast of The Mens Special Area of Conservation (SAC) and therefore lies within the 12km Wider Conservation Area for The Mens SAC, for which significant impacts or severance to flightlines must be considered. The qualifying feature for The Mens SAC is Barbastelle bats and there is one record for this species 1.08km south of the site (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 111 other records for bats within 2km of the site, comprising unidentified bat species, Serotine, Myotis sp, Natterer's, Daubentons, Noctule, Common and Soprano Pipistrelle and Brown Long-eared bat (SxBRC). No European Protected Species Mitigation Licences (EPSML) have been granted for bats within 2km of the site (MAGIC maps).

The site lies 14.7km southeast of Ebernoe Common SAC and is therefore outside the 12km Wider Conservation Area for this SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 3.5km east of Arun Valley SAC, SPA and Ramsar site.

We understand from the submitted documents, including the Biodiversity Impact Calculation Report (Libby Morris Ecologist, July 2024) that the site comprises scattered trees (610m2), neutral and modified grassland, broadleaf woodland (1551.9m2), buildings and sealed and unsealed surfaces. The broadleaf woodland and scattered trees will be retained. One native hedgerow of 36m will be created, 122.08m2 of scattered trees will be planted and the grassland will be enhanced.

Therefore, 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.

It is recommended in the Ground Level Tree Assessment (Xenia Ecology, May 2025) 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 bats may use the onsite habitat, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Ground Level Tree Assessment (Xenia Ecology, May 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 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 believe that, with mitigation, there will be no Adverse Effect on Integrity of the 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 now have no objections on ecological matters excluding Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the NatureSpace Partnership.

We support the proposed reasonable biodiversity enhancements, which include bird and bat boxes, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 180d and 186d of the National Planning Policy Framework (December 2023). The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Layout and should be secured by a condition of any consent.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

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 Ground Level Tree Assessment (Xenia Ecology, May 2025) and Bat Scoping Report (The Ecology Co-op Ltd., November 2023), 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 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 Ground Level Tree Assessment (Xenia Ecology, May 2025) and Bat Scoping Report (The Ecology Co-op Ltd., November 2023) 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).

3. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

"*A lighting design scheme for biodiversity shall be 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, Isolux drawings 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 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)
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.