Place Services
Essex County Council
County Hall, Chelmsford
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Date: 10 June 2025 Our ref: 04916

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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/25/0145
Location: Hope Farm The Haven Billingshurst West Sussex RH14 9BN
Proposal: Proposed demolition of 1970's extension to Grade II listed Farmhouse and changes to architectural treatment of proposed extension which was part of consented planning applications DC/22/2377 and DC/22/2378. Proposed new dwelling to north of the Farmhouse and associated landscape works (Full Planning)

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 comments on the conclusion of the Water Neutrality AA	☒
Subject to Natural England's comments on the conclusion of the bat HRA (screening only)	☒

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 Nocturnal Bat Survey Report (Collington Winter, January 2025), Ecological Walkover Survey – Technical Note Rev 1 (Urban Edge Environmental Consulting, January 2025), Nocturnal Bat Survey Report (Collington Winter, July 2023), Preliminary Ecological Appraisal Report Rev 2 (Urban Edge Environmental Consulting (July 2023), Nocturnal Bat Survey Report (Collington Winter, December 2022) and Preliminary Ecological Appraisal Report Rev 1 (Urban Edge Environmental Consulting (September 2022), relating to the likely impacts of development on designated sites, protected & Priority species and habitats, and identification of appropriate mitigation measures. Please note that comments on mandatory biodiversity net gain are provided by Horsham District Council in-house.

We note from the Nocturnal Bat Survey Report (Collington Winter, January 2025) that a European Protected Species Mitigation Licence for bats will be required before commencement of any works and recommend that a copy of this is secured by a condition of any consent. This is because the dusk/dawn emergence surveys for bats undertaken in August and September 2022 and in June 2023 confirmed the presence of the following bat day roosts in the farmhouse:
Roost 1a: single Common Pipistrelle
Roost 1b: single Common Pipistrelle
Roost 1c: single Brown Long-eared
Roost 1d: single Myotis spp. Bat
Roost 1e: single Soprano Pipistrelle
Roost 1f: single Soprano Pipistrelle
In addition, the Nocturnal Bat Survey Report (Collington Winter, January 2025) confirms the presence of the following bat roosts:
Roost in room 4R: Brown Long-eared bat
Roost in room 2L: Brown Long-eared bat

We support the outline Method Statement in Section 5.6.1 of the Nocturnal Bat Survey Report (Collington Winter, January 2025). We understand from Section 5.1.1 that a further survey will be undertaken in May-June 2025 during the maternity season to inform the mitigation measures. We also note from Section 6.1.6 that the farmhouse has sub-optimal bat hibernation roost potential as the temperatures are variable.

The site lies approximately 4.8km northeast of The Mens Special Area of Conservation (SAC) and is therefore within the 6.0km Key Conservation Area for the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 8.5km northeast of Ebernoe Common SAC and therefore lies within the 12km Wider Conservation Area for this SAC. The qualifying feature of the SAC is Barbastelle bat, but this species has not been recorded within 2km of the site. Two European Protected Species Mitigation Licences have been granted within 2km of the site: a) 580m to the west in 2012 for Common Pipistrelle, Brown Long-eared and Natterer's bat; and b) 700m to the north in 2018 for Soprano Pipistrelle bat (MAGIC maps). There are approximately 33 records of bats within 2km of the site, including Soprano and Common Pipistrelle, Noctule, Natterers

and Serotine (SBISx – accessed under licence). The site lies approximately 12.3km north of Arun Valley SAC, SPA and Ramsar site.

We understand from the Ecological Walkover Survey – Technical Note Rev 1 (Urban Edge Environmental Consulting, January 2025) that the application site lies in the northeast corner of the original survey site and comprises circa 0.28ha with a farmhouse, hardstanding and areas of grassland, broadleaved

plantation woodland, shrubs, hedgerow, dry ditch and scattered trees. We note from the Statutory Biodiversity Metric that Hedgerows H3 and H4 will be retained (0.077km) and that 0.855ha of rural trees and 0.012km of native hedgerow will be planted. 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.

We therefore believe there will be no Adverse Effect on Integrity of the bat SAC. We advise the LPA to prepare a project level HRA Screening Report to record its decision and retain on file.

If external lighting is required, and as Barbastelle bat may use the onsite habitat, we support the recommendation that the use of external light will be avoided or minimised (Preliminary Ecological Appraisal Report Rev 2 (Urban Edge Environmental Consulting (July 2023)) 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 note from the Ecological Walkover Survey – Technical Note Rev 1 (Urban Edge Environmental Consulting, January 2025) that tree T30 has Potential Roost Features for individual bats (PRF-I), but is not scheduled for removal during the works. However, if there

will be any arboricultural works to the tree, we highlight that trees with PRF-I which will be impacted must be subject to a non-licensed Precautionary Working Method Statement. This should include inspection of any affected trees by endoscope on the day under the supervision of a licensed bat ecologist, as required in Table 6.3 of 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023).

We agree that, as no further works to the plantation woodland are expected and hedgerows H3 and H4 will be retained, no measures to protect Hazel Dormouse are required (Ecological Walkover Survey – Technical Note Rev 1 (Urban Edge Environmental Consulting, January 2025)).

We support the Precautionary Method Statement for mobile protected species (including Hedgehog, which is a Priority and threatened species) in Table 5 (R5) of the Ecological Walkover Survey – Technical Note Rev 1 (Urban Edge Environmental Consulting, January 2025). This should be secured by a condition of any consent and implemented in full.

We are satisfied that there is sufficient ecological information available to support determination of this application. However, please note 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 Nocturnal Bat Survey Report (Collington Winter, January 2025) and Ecological Walkover Survey – Technical Note Rev 1 (Urban Edge Environmental Consulting, January 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, including bats and mobile protected species.

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). 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 Nocturnal Bat Survey Report (Collington Winter, January 2025) and Ecological Walkover Survey – Technical Note Rev 1 (Urban Edge Environmental Consulting, January 2025), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. This includes the Precautionary Method Statement for mobile protected species in Table 5 (R5) of the Ecological Walkover Survey – Technical Note Rev 1 (Urban Edge Environmental Consulting, January 2025), which avoids impacts on protected species.

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 OF ANY WORKS WHICH WILL IMPACT THE BREEDING / RESTING PLACE OF BATS: SUBMISSION OF A COPY OF EPS MITGATION LICENCE OR EVIDENCE OF SITE REGISTRATION UNDER A BAT MITIGATION CLASS LICENCE FOR BATS

"*Any works which will impact the breeding / resting place of bats, shall not in in any circumstances commence unless the local planning authority has been provided with either:*

a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or
b) evidence of site registration supplied by an individual registered to use a Bat Mitigation Class Licence; or
c) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence."

Reason: To conserve protected 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 s17 Crime & Disorder Act 1998.

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

"A Biodiversity Enhancement Layout for the biodiversity enhancements listed in the Ecological Walkover Survey – Technical Note Rev 1 (Urban Edge Environmental Consulting, January 2025) 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).

If external lighting is required:

4. 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 (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 do not hesitate to contact us if you have any queries in relation to this advice.

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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.