



Date: 19 June 2026

Our ref: 18222

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Parkside,
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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.

Application: DC/26/0740

Location: Town House Farm Guildford Road Clemsfold West Sussex RH12 3PP

Proposal: Erection of a single storey side and rear extension.

Thank you for consulting Place Services on the above householder application.

No ecological objection	☐
No ecological objection subject to attached conditions	☐
Further information required/Temporary holding objection: European Protected Species (bats)	☒
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 Bat Scoping and Emergence Survey Report (The Ecology Co-op, October 2025) and 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 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 are not satisfied that there is sufficient ecological information available for determination of this application and recommend that further information on bats is required to make this proposal acceptable prior to determination. The reasons for this are outlined below:

European Protected Species: bats

We note from the Bat Scoping and Emergence Survey Report (The Ecology Co-op, October 2025) that two emergence surveys were undertaken on the two-storey residential dwelling and the barn in August and September 2025. The surveys concluded that the following bat roosts are present in the dwelling:

- Long-eared bat day roost in southern side loft void
- Natterer's bat day roost under hanging tiles on western elevation
- Soprano Pipistrelle day roost under hanging tiles on western elevation
- Common Pipistrelle day roost under eaves of western elevation
- Pipistrelle bat day roost under hanging tiles on western elevation
- Soprano Pipistrelle day roost under hanging tiles on southern elevation
- Common pipistrelle day roost under hanging tiles on southern elevation
- Pipistrelle bat day roost under hanging tiles on southern elevation
- Pipistrelle bat day roost under hanging tiles on northern elevation

The surveys concluded that the following bat roosts are present in the barn:

- Brown long-eared bat day roost in the interior
- Common Pipistrelle day roost under the eaves of the eastern elevation

We understand that the works comprise a single storey extension on the southern and western elevations of the dwelling, which will involve the removal of some rows of hanging tiles on these aspects. We understand from the Bat Scoping and Emergence Survey Report (The Ecology Co-op, October 2025) that the works are not expected to '*significantly disturb/modify*' the roosts on the western and southern elevations and Section 5.3 of the Bat Scoping and Emergence Survey Report (The Ecology Co-op, October 2025) comprises outline mitigation measures for a non-licensed Precautionary Method Statement for bats. As it appears that bats may be impacted by the works, we request further justification as to why a licence for bats is not required. This is in line with [Government Standing Advice](#) which states that it is an offence under the Conservation of Habitats and Species Regulations 2017 to:

- *deliberately kill, injure, disturb or capture bats*
- *damage or destroy their breeding sites and resting places (including when bats are not present)*

In addition, it is an offence under the Wildlife and Countryside Act 1981 to intentionally or recklessly:

- *disturb bats while they occupy a structure or place used for shelter or protection*
- *obstruct access to any structure or place used for shelter or protection*

The additional information is 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

The works will also comprise an extension to the covered walkway of the barn. We understand that the works will not impact the Brown Long-eared bat and Common Pipistrelle bat day roosts as the works are limited to the walkway (Bat Scoping and Emergence Survey Report (The Ecology Co-op, October 2025). We also understand from the Bat Scoping Report and Preliminary Ecological Appraisal (The Ecology Co-op June 2025) that the tree to be removed has negligible bat roost potential. Therefore, we agree that no further surveys for bats are required in relation to the barn or for trees.

We understand from the Bat Scoping Report and Preliminary Ecological Appraisal (The Ecology Co-op June 2025) that the dwelling has low hibernation potential for bats. Therefore, we support the implementation of timing the works between mid-March and the end of October to avoid impacting hibernating bats. This needs to be secured by a condition of any consent and implemented in full.

If external lighting is required, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Bat Scoping Report and Preliminary Ecological Appraisal (The Ecology Co-op June 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 also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Bat Scoping Report and Preliminary Ecological Appraisal (The Ecology Co-op June 2025), 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 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.

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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.*