



Date: 14 July 2026

Our ref: 19180

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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.

Application: DC/26/0462
Location: Mill Farm Mill Lane Itchingfield West Sussex RH13 0NP
Proposal: Demolition of redundant agricultural buildings and the erection of two dwellings; change of use of land from agriculture to residential gardens.

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: • 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 Ecological Impact Assessment V1 (South Downs Ecology, August 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 additional information on bats is provided prior to determination.

European Protected Species (bats)

We understand from the Existing Tree Schedule (South Downs Ecology, submitted March 2026) that there are trees within the hedgerow (including T02 Ash) which will be removed. Therefore, we request clarification as to whether these trees have been subject to a Ground Level Tree Assessment for impacts to roosting bats.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, which are European Protected Species. This information is required prior to determination ([Government Standing Advice](#)).

The 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

We note from the Ecological Impact Assessment V1 (South Downs Ecology, August 2025) that Building B1 (barn) and B2 (small barn/store) both have negligible bat roost potential. Therefore, we agree that no further surveys for bats are required for these buildings.

The site lies approximately 10.8km northeast of The Mens Special Area of Conservation (SAC) and is therefore within the 12km Wider Conservation Area for the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). 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) 730m to the north in 2013 for Common Pipistrelle bat, Soprano Pipistrelle, Brown Long-eared bat and Natterers' bat; and b) 870m to the north in 2013 for Common Pipistrelle and Soprano Pipistrelle bat ([MAGIC maps](#)). There are 74 records of bats within 2km of the site, including Serotine, Daubenton's, Natterers, Noctule, Common Pipistrelle and Soprano Pipistrelle (Sussex Biodiversity Record Centre – accessed under licence).

The site lies approximately 15.7km east of Ebernoe Common SAC and therefore lies outside the 12km Wider Conservation Area for this SAC. The site lies approximately 14.4km north of Arun Valley SAC, SPA and Ramsar site.

We understand from the submitted documents that the site comprises modified grassland, two farm buildings, hedgerow with trees and an access track. An area of ancient woodland lies immediately to the northwest of the site. We understand that 0.06km of native hedgerow with trees and 0.01km of a line of trees will be retained and 0.14km of native hedgerow with trees will be planted, together with mixed scrub, traditional orchard / neutral grassland.

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.

We understand that works will take place within the 15m buffer zone for the ancient woodland (irreplaceable habitat) to the northwest of the site with Building B2 lying within the buffer zone. Therefore, we support the mitigation and compensation measures to protect the ancient woodland in Section 7.78 of the Ecological Impact Assessment V1 (South Downs Ecology, August 2025).

We support the Precautionary Method Statement for reptiles and mobile protected and Priority species (including Hedgehog, which is a threatened and Priority species) in Sections

7.19, 7.20, 7.23 and 7.24 of the Ecological Impact Assessment V1 (South Downs Ecology, August 2025). 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 (Ecological Impact Assessment V1 (South Downs Ecology, August 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 Ecological Impact Assessment V1 (South Downs Ecology, August 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 need to be 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.