

Attn: Case Officer Mr Matthew Porter

Horsham District Council

planning@horsham.gov.uk

5 September 2026

Dear Mr Porter,

CPRE Sussex representation OBJECTING to:

DC/26/0972

Reserved Matters submission pursuant to condition 2a of outline planning permission DC/24/2006 for the erection of 62 dwellings relating to matters of appearance, landscaping, layout and scale.

Land at 508918 115291 Melton Drive Storrington West Sussex

Our concerns and reasons for objecting to this Reserved Matters' submission are explained below.

1. The Horsham District Council Habitats Regulations Assessment Appropriate Assessment Record (Place Services, 7 May 2025), DC/24/2006, regarding Barbastelle and The Mens Special Area of Conservation (SAC), includes the following statements:

“Barbastelle have been recorded commuting along the tree lines and hedgerows onsite, so the site is considered important for Barbastelle bats at a site level”.

“This development is within the “core conservation zone” for The Mens SAC, and there lies within a ‘bat sustenance zone’ for Barbastelle bats, a designated feature of The Men’s SAC”.

“Stage 1 HRA screening has determined that Likely Significant Effects (LSE) are possible at The Men’s SAC as a result of impacts on habitat connectivity and availability for foraging and commuting Barbastelle bats”.

It was Place Services “understanding that no trees have been removed as part of this development and there will be no severance to the flight lines of foraging or commuting bats or removal of habitat within the site”.

“To minimise the effects of artificial lighting on foraging and commuting bats, the new residential development will incorporate a ‘sensitive lighting plan’, prepared as part of the detailed design in accordance with the guidelines set out by the Bat Conservation Trust”.

“This will include measures to create ‘dark corridors’ along the western and southern boundaries including the buffer zones that are being retained. Any lighting will be directed downwards and use light sources that are not attractive to insects and reflective white line marking used in preference to artificial lighting in all non-essential applications”.

“This will be secured by a condition of any consent”.

“This measure is considered appropriate to avoid adverse effects on the integrity of the interest features (Barbastelles) of The Men’s SAC.

“These will be secured by a condition of any consent”.

2. The HDC Decision Notice, dated 8 December 2025, granting Outline planning application for DC/24/2006 with all matters reserved apart from access, sets as part of each reserved matter’s application pre-commencement conditions for Hazel Dormouse and Reptiles, but not for ‘foraging and commuting bats’ (including Barbastelle).

2.1 The stated purpose of these conditions is to conserve protected species and allow the Local Planning Authority 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 and Policy 31 of the Horsham District Planning Framework (2015) and Policy 15 of the Storrington Sullington and Washington Neighbourhood Plan (2019).

3. The site is “of High suitability for commuting and foraging bats”.

3.1 “The site has commuting and foraging value due to the abundance of linear features (i.e., hedgerows and woodland edges), which provides good connectivity to the wider landscape providing links between roosts and foraging features such as woodland areas, scrub, and waterbodies. The site was therefore considered to be of High suitability for commuting and foraging bats” (Land North of Melton Drive, Storrington: Ecological Impact Assessment, RSK 2486771, December 2024, paragraph 3.4.2).

3.2 Bat activity surveys on the site in July and September 2024 identified at least 9 species: Barbastelle (*Barbastella barbastellus*); Brown long-eared (*Plecotus auritus*); Common pipistrelle (*Pipistrellus pipistrellus*); Leisler’s (*Nyctalus leisleri*); Myotis species (likely Natterer’s (*Myotis nattereri*) or Daubenton’s (*Myotis daubentonii*); Noctule (*Nyctalus noctula*); Nathusius’ pipistrelle (*Pipistrellus nathusii*); Serotine

(*Eptesicus serotinus*) and Soprano pipistrelle (*Pipistrellus pygmaeus*). (Outline Ecological Mitigation Strategy December 2024, paragraph 2.6.3).

3.3 Barbastelle was “the third most recorded (bat) species within the site, with 16% of the total calls in July and 7% of the total calls in September” 2024 (Ecological Impact Assessment December 2024, 4.1.6).

3.4 Citing Natural England as source, the Ecological Impact Assessment, December 2024, advises that Barbastelle have an average core sustenance range of 7km but have been recorded ranging 20km to reach productive foraging grounds (paragraph 4.1.6).

3.5 Barbastelle “need a range of habitats during the year in response to the annual cycle, the bats feed at a number of locations through the night and will select different feeding areas through the year linked to the seasonal availability of their insect prey; of mating, hibernating, giving birth and raising young” (Barbastelle Bats Exmoor and Quantocks Oak Woodlands Special Area of Conservation (SAC) Guidance on Development. Larry Burrows, Ecologist, Somerset Ecology Services, Planning Control, Somerset County Council working in partnership with Natural England, April 2018).

4. In respect of Barbastelle, the proposed development site’s habitats should be considered functionally linked to The Mens SAC, and subject therefore to a high level of protection in consequence.

4.1 The Mens is designated an SAC under article 4(4) of the Directive 92/43/EEC on the ‘Conservation of Natural Habitats and of Wild Fauna and Flora. Citation for Special Area of Conservation’, because it hosts Barbastelle, an Annex II listed species, and the Annex I listed habitats: Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrub layer (*Quercion roburi-petraeae* or *Ilici-Fagenion*). (Beech forests on acid soils).

4.2 The Mens SAC is located 8.9km north-west of Land at Melton Drive (Ecological Impact Assessment, December 2024, paragraph 4.1.6).

4.3 The site is therefore within the 12km Wider Conservation Area (Draft Sussex Bat SAC Planning and Landscape Scale Enhancement Protocol, Map 2).

4.4 The Protocol advises that

“Bats (Barbastelle and Bechstein’s) roosting within the SACs (The Mens SAC and Ebernoe Common SAC) rely on land outside of the site boundaries. Such land which is required to sustain the bats associated with the SACs is referred to as being ‘functionally linked’ to the SAC”.

“Where impacts to such functionally linked land could result in significant effects to the bat populations associated with the SAC, full consideration needs to be undertaken under the Habitats Regulations (in the same way as habitat in the SAC)”.

“In short, whilst the European protected species legislation protects the bats and their breeding and resting places, it is the effect of the designation of the SAC that protects, through the Habitats Regulations Assessment process, the habitat of the bats outside the SAC”.

4.5 In respect of Barbastelle, the proposed development site’s habitats should be considered functionally linked to The Mens SAC, and subject therefore to a high level of protection in consequence.

5. Natural England’s Guidance Bats advice for making planning decisions: How to assess a planning application when there are bats on or near a proposed development site’ (updated 7 April 2025) is Natural England’s ‘standing advice’ in respect of bats, which “local planning authorities (LPAs) should take into account when making planning decisions. It is a material planning consideration for LPAs”.

5.1 The Guidance advises that:

“Several species of bats are [included on the list of species of principal importance in England](#) under section 41 of the Natural Environment and Rural Communities Act (2006). Some species are also listed as vulnerable, endangered and critically endangered on the [Red List for England’s Mammals on the Mammal Society website](#).”

5.2 The Guidance stipulates that:

“You must consider the conservation of all bat species as part of your planning decision. Find out more about your [biodiversity duty](#)”.

“The effect of a development proposal on a bat population will need to consider the predicted level of impact based on both the:

- conservation status of the bat species affected
- **importance of the development site for bats at a local and national level”.**

5.3 a Section 41 bat species of Principal Importance in England recorded at the site: Barbastelle and Brown Long-eared.

5.3 b Bat species listed on the [Red List for England’s Mammals on the Mammal Society website](#) recorded at the site:

‘Near threatened’: Leisler’s and Nathusius’ pipistrelle.

‘Vulnerable’: Barbastelle and Serotine.

6. The Land North of Melton Drive, Storrington, Outline Mitigation Strategy, December 2024 (RSK 2486771) at paragraphs 5.5.2 and 5.5.3, states that

“6m additional dark corridors (as shown in Figure 2) will be enforced around retained hedgerows, to ensure no additional light spill on habitats where bats, especially Barbastelle, were recorded foraging and commuting most (paragraph 5.5.2).

Barbastelle, Brown Long-eared and *Myotis* bats are light adverse. Current lux levels on the borders of the site (where hedgerows and tree lines are) should be measured prior to construction and lux levels matched post-construction.

Ultimately, lux levels must not be above 1 on the borders or ecology areas post-construction.

If artificial lighting during construction will be required, a lighting strategy will be prepared in liaison with a bat ecologist to limit external light spill into the edge habitats of the site (i.e. by using hoods or shields over lighting), and to create dark zones to allow bats to commute and forage through the site”.

6.1 Referring to Figure 2 the proposed dark corridor does not extend for the full length of the site’s western boundary.

6.2 To ensure no additional light spill on habitats where bats, especially Barbastelle, were recorded foraging and commuting most, the dark corridor should extend for the full length of the eastern boundary.

7. CPRE Sussex is very concerned that notwithstanding Horsham District Council Habitats Regulations Assessment (HRA) Appropriate Assessment Record (Place Services, 7 May 2025), DC/24/2006, and the stipulated measure ‘considered appropriate to avoid adverse effects on the integrity of the interest features (Barbastelle) of The Men’s SAC’ that was to be secured by a condition of any consent, HDC’s Decision Notice contains no such condition in respect of Barbastelle.

7.1 To ensure and secure the essential protection, approval of DC/26/0972 should be subject to the HRA’s specified condition, which should be set as a pre-condition for the application as follows:

- i. To minimise the effects of artificial lighting on foraging and commuting bats, the new residential development will incorporate a ‘sensitive lighting plan’, prepared as part of the detailed design in accordance with the guidelines set out by the Bat Conservation Trust”.
- ii. This will include measures to create ‘dark corridors’ along the western and southern boundaries including the buffer zones that are being retained.
- lii. Any lighting will be directed downwards and use light sources that are not attractive to insects and reflective white line marking used in preference to artificial lighting in all non-essential applications”.

And as specified by RSK in their Land North of Melton Drive, Storrington: Outline Mitigation Strategy, December 2024 (RSK 2486771): section 7.5 Bats: Lighting Plan paragraphs 7.5.1 to 7.5.4 :

iv. A sensitive lighting plan will be implemented, including dark corridors across the site and the BPZs along hedgerows. Additionally, the public open space areas include dark space for bats.

v. The lighting strategy for the proposed scheme must ensure that post development night – time lighting levels with the proposed dark corridors do not exceed 1 lux” .

vi. A lux contour plan (to be produced) will detail light spill from all new lighting on site, both external and internal. The final lighting details will be prepared for the reserved matters stage of planning. Site lighting will be undertaken following appropriate specifications including:

- Use of LED luminaires as they provide a sharp ‘cut-off’, are lower intensity and provide good colour rendition;
- Avoiding the use of ultraviolet (UV) elements during manufacturing of the light fitting and avoidance of metal halide and inflorescent sources;
- Use of a medium white spectrum at 2700 Kelvin or below; • Luminaries to feature peak wavelengths higher than 550 nm to avoid the component of light most disturbing to bats;
- The use of specialist bollard or low-level downward directional luminaires to retain darkness above:
- Column heights adjacent to pedestrian footpaths will be c. 2 m in height or below;
- Where required, the height of street lighting columns will be restricted to 5 m above ground or below;
- Any security lighting will be positioned no higher than 4 m above ground and fitted with a motion sensor set to 1-minute timers;
- Luminaries to be mounted on the horizontal plane i.e., no upward lighting;
- Use of baffles, hoods, or canopies to reduce light spill;

vii. To ensure that commuting routes and foraging areas remain dark and favourable to bats, both internal and external light sources on adjacent buildings must be adjusted. This can be through the use of louvres/cowls/shields on external light fittings to prevent light spills, as well as internal light fittings being recessed or set back from windows. The exact measures of the light fittings, however, will be dependent on the final design

of the buildings. Any balconies on the adjacent elevations should be of a solid construction to further block light from internal sources.

7.2 **Furthermore, since it was Place Services' (stated in the HRA)** "understanding that no trees have been removed as part of this development and there will be no severance to the flight lines of foraging or commuting bats or removal of habitat within the site", approval of DC/26/0972 should be conditional on compliance with this understanding.

Accordingly, 'Retention and enhancement of the site's trees and habitats, to maintain flight lines of foraging or commuting bats', should also be set as a pre-condition for DC/26/0972.

Yours faithfully,

Dr R F Smith, DPhil, BA (Hons), PGCE, FRGS
Trustee CPRE Sussex

Copy to: CPRE Sussex Planning Campaigner Maria Tomalova