



Nicola Pettifer
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

Our ref: 11931
Date: 7 January 2026

By email only: Planning Department, planning@horsham.gov.uk;

Contains sensitive information

Thank you for requesting advice on this outline 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/25/1019
Location: Land To The West of Shoreham Road Small Dole West Sussex
Proposal: Outline planning application for up to 45 dwellings (including affordable homes) with all matters reserved apart from access.

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

No ecological objection	<input type="checkbox"/>
No ecological objection subject to attached conditions	<input checked="" type="checkbox"/>
Further information required/Temporary holding objection	<input type="checkbox"/>
Recommend Refusal	<input type="checkbox"/>
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	<input type="checkbox"/>

Please refer to Horsham District Council's advice regarding [Water Neutrality requirements](#) following Natural England's Withdrawal Statement (31st October 2025).

Summary

We have reviewed the following documents relating to the likely impacts of development on designated sites, protected and Priority species and habitats and the identification of proportionate mitigation:

- Bat – Ground Level Tree Assessment (Ecology Partnership, October 2025)
- Reptile Presence/Likely Absence Survey 2025 (Ecology Partnership, June 2025)
- Ecology Partnership Letter Response (8th December 2025)
- Dormouse Survey Report 2025 (The Ecology Partnership, September 2025)
- Bat Activity Survey 2025 (The Ecology Partnership, September 2025)
- [REDACTED]
- Reptile Presence/Likely Absence Survey (The Ecology Partnership, June 2025)
- Preliminary Ecological Assessment (The Ecology Partnership, June 2025)
- Dormouse Surveys (The Ecology Partnership, January 2023)
- Bat Activity Surveys (The Ecology Partnership, January 2023)
- Reptile Survey (The Ecology Partnership, January 2023)
- [REDACTED]

Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We are now satisfied that there is sufficient ecological information available to support determination of this application.

European Protected Species - bats

As stated previously we note from the Arboricultural Implications Report (SJA Trees, April 2025) that tree G20 (Goat Willow) will be removed. In addition, the following trees will be partially removed:

- G4 (Goat Willow)
- G6 (various)
- G11 (various)
- G18 (various)

The applicant has now provided the results of a GLTA, which found none of the proposed trees or groups of trees to be removed to possess potential roosting features. We are satisfied further surveys are not considered necessary.

As stated previously, we note from the Bat Activity Survey 2025 (The Ecology Partnership, September 2025) that the majority of the nine bat species recorded are common, including Pipistrelle spp. and *Myotis* spp. However, a total of 19 passes by Barbastelle bat were recorded by the static detector surveys on the southern and eastern boundaries in April and June. As the Barbastelle bat recordings were made at least 50 minutes after sunset, we agree that it is unlikely that there is a roost nearby. We support the proposal in Section 5.2

of the Bat Activity Survey 2025 (The Ecology Partnership, September 2025) to create overhanging scrub in the form of an 'aerial bridge' on the eastern boundary where vegetation will be removed to create access roads.

As Barbastelles may use this site for foraging and commuting, we also support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Section 5.22 Bat Activity Survey 2025 (The Ecology Partnership, September 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.

European Protected Species - Dormouse

We note from Section 4.1 of the Dormouse Survey Report 2025 (The Ecology Partnership, September 2025) that no evidence of Hazel Dormouse was found during the surveys between April and September 2025. We therefore agree that no further surveys for Hazel Dormouse are required. However, we support the planting proposal in Section 4.3 of the Dormouse Survey Report 2025 (The Ecology Partnership, September 2025), which includes native species such as Hazel, Field Maple and Hawthorn.



Protected Species – Reptiles

We note that the Reptile Presence/Likely Absence Survey (The Ecology Partnership, June 2025) indicates that a reptile translocation will be required. This is because there is a 'good' population of Slow Worm, and 'low' populations of Common Lizard and Grass Snake on site. We support the reptile mitigation strategy in Section 4.4 of the Reptile Presence/Likely Absence Survey (The Ecology Partnership, June 2025) and understand that the northern and western boundaries have been identified as the receptor site. This needs to be secured by a condition of any consent and implemented in full. (Please note that the Reptile Presence/Likely Absence Survey (The Ecology Partnership, June 2025) refers to 'Sayers Common' on the title page, although the site details are correct.)

We also recommend that a Construction Environmental Management Plan (CEMP) - Biodiversity is prepared for this application. This needs to be secured by a condition of any consent and implemented in full.

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 Preliminary Ecological Assessment (The Ecology Partnership, June 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.

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).

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 Preliminary Ecological Assessment (The Ecology Partnership, June 2025) 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. CONCURRENT WITH RESERVED MATTERS: PRIOR TO COMMENCEMENT: BIODIVERSITY METHOD STATEMENT

"No development shall take place (including any demolition, ground works, site clearance) until a Biodiversity Method Statement for protected and Priority species [REDACTED] and reptiles) has been submitted to and approved in writing by the local planning authority.

The content of the method statement shall include the following:

- a) purpose and objectives for the proposed works;
- b) detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);
- c) extent and location of proposed works shown on appropriate scale maps and plans;
- d) timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
- e) persons responsible for implementing the works;
- f) initial aftercare and long-term maintenance (where relevant);
- g) disposal of any wastes arising from works.

The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter."

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), s40 of the NERC Act 2006 (as amended) and s17 Crime & Disorder Act 1998.

3. CONCURRENT WITH RESERVED MATTERS: PRIOR TO COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN FOR BIODIVERSITY

“A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority.

The CEMP (Biodiversity) shall include the following.

- a) *Risk assessment of potentially damaging construction activities.*
- b) *Identification of “biodiversity protection zones”.*
- c) *Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) *The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) *The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) *Responsible persons and lines of communication.*
- g) *The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) *Use of protective fences, exclusion barriers and warning signs.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority”

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).

4. CONCURRENT WITH RESERVED MATTERS: 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, 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).

**5. CONCURRENT WITH RESERVED MATTERS: 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 contour 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 contact us if you have any queries in relation to this advice.

Hayley Dean MCIEEM MSc BSc (Hons)
Senior Ecological Consultant
 Place Services at Essex County Council



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.*