



Date: 26 November 2025

Our ref: 07662

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By email only: Planning Department, [planning@horsham.gov.uk](mailto:planning@horsham.gov.uk);

**Contains sensitive information**

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*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.*

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**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.

<b>No ecological objection</b>	<input type="checkbox"/>
<b>Recommend approval subject to attached conditions</b>	<input type="checkbox"/>
<b>Further information required/Temporary holding objection for European Protected Species (bats)</b>	<input checked="" type="checkbox"/>
<b>Recommend Refusal</b>	<input type="checkbox"/>
<b>Subject to Natural England's formal comments on the conclusion of Appropriate Assessment</b>	<input type="checkbox"/>

Please refer to Horsham District Councils advice regarding [Water Neutrality requirements](#) following Natural England's Withdrawal Statement (31<sup>st</sup> 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:

- 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 still not satisfied that there is sufficient ecological information on protected species available for determination of this application and we recommend that further information is provided prior to determination. The reasons for this are outlined below:

### **European Protected Species - bats**

As stated in our response dated 16<sup>th</sup> September 2025, 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)

Government Standing Advice says that you should ask for a survey if:

- *distribution and historical records suggest bats may be present*
- *the development site includes or is close to [trees](#), shrubs, rock formations, quarries, natural cliff faces or water bodies that provide commuting, foraging or roosting opportunities for bats*

Therefore, a Ground Level Tree Assessment for Potential Roost Features (PRFs) for bats needs to be undertaken. We highlight that if PRFs for Individual Bats (PRF-Is) are identified, then appropriate compensation will be required in advance of works to avoid loss of roost resource (Reason and Wray (2023) UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1. Chartered Institute of Ecology and Environmental Management). In addition, a non-licensed Precautionary Working Method Statement for bats will be required, which includes inspection of any affected trees by endoscope on the day and felling 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).

The results of the surveys for bats are 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.

### **Additional comments**

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.

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.

[REDACTED]

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.

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.

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 overcome our holding objection.

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

Yours sincerely

**Hayley Dean MCIEEM MSc BSc (Hons)**  
**Senior Ecological Consultant**

Place Services at Essex County Council

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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.*

