



Date: 13 October 2025

Our ref: 08024

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

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*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. 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/25/1155  
**Location:** Land East of Tilletts Lane Warnham  
**Proposal:** Erection of 59 dwellings with associated open space, landscaping, parking, access, and drainage infrastructure.

Thank you for consulting Place Services on the above application.

<b>No ecological objection</b>	<input type="checkbox"/>
<b>Recommend approval subject to attached conditions</b>	<input type="checkbox"/>
<b>Further information/ Temporary holding objection for European Protected Species (bats) and protected species (reptiles)</b>	<input checked="" type="checkbox"/>
<b>Recommend Refusal</b>	<input type="checkbox"/>
<b>Subject to Natural England's comments on the conclusion of the Water Neutrality AA</b>	<input checked="" type="checkbox"/>
<b>Subject to Natural England's comments on the conclusion of the bat AA</b>	<input checked="" type="checkbox"/>

Please note that following receipt of Natural England's position statement on developments in the Sussex North Water Supply Zone, decisions on planning applications should await the completion of a Sussex North water neutrality strategy.

### Summary

We have reviewed the Reptile Survey Report (Animal Ecology & Wildlife Consultants, November 2024), 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 on protected species available for determination of this application. We recommend that further information on protected species is provided prior to determination. The reasons for this are outlined below:

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

We understand from the Arboricultural Impact Assessment and Preliminary Method Statement (MDJ Arboricultural Consultancy Limited, June 2025) that the development includes the removal of the following trees and groups of trees: tree T47 (Hornbeam), T63 Common Ash, T64 English Oak, T65 (Blackthorn) G4 (partial, various), G6 (partial, various) and G7 (partial, various). Therefore, there may be impact to bats and a Ground Level Tree Assessment for Potential Roost Features needs to be undertaken.

[Government Standing Advice](#) says 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

### **Protected Species - reptiles**

We understand from the Reptile Survey Report (Animal Ecology & Wildlife Consultants, November 2024) that there is an exceptional population of Slow Worm onsite and a low population of Grass Snake onsite. Therefore, we support the implementation of a reptile mitigation strategy, which may include the off-site translocation of reptiles.

If translocation of reptiles to an off-site receptor site is required, we highlight that [Government Standing Advice](#) says:

*If translocating reptiles, the proposal needs a receptor site:*

- *close to the development site, and within the same LPA if possible*
- *that is at least the same size as the habitat that will be lost, and larger if the lost habitat is of high quality*
- *that will serve the same function as the habitat to be lost, for example it has hibernation features*
- *with similar habitat to the area that will be lost, including water bodies*
- *that does not currently support the same species, but can be improved to make it suitable*
- *that will be safe from future development and managed in the long term*

This means that the receptor site must be identified and assessed to ensure it meets these requirements and it has sufficient carrying capacity for the translocated reptile populations. We recommend that the assessment is submitted to the LPA prior to determination.

The survey information for bats and the reptile mitigation strategy 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**

The site lies approximately 13.7km northeast of The Mens Special Area of Conservation (SAC) ([MAGIC maps](#)) and therefore lies outside within the 12km Wider Conservation Area for The Mens SAC. Therefore, a project level Habitats Regulations Assessment (HRA) will not be required.

We recommend that a Wildlife Friendly Lighting Strategy is implemented for this application to avoid impacts from light disturbance. This needs to be secured by a condition of any consent and implemented in full.

We also recommend that reasonable biodiversity enhancements for protected, Priority and threatened species should be identified and implemented 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 need to be outlined within a separate Biodiversity Enhancement Strategy and secured by a condition of any consent.

Please note 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.

**Hayley Dean MCIEEM MSc BSc (Hons)**

**Senior Ecological Consultant**

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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.*