



Date: 16 September 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 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</b>	<input checked="" type="checkbox"/>
<b>Recommend Refusal</b>	<input type="checkbox"/>
<b>Subject to Natural England's formal comments on the conclusion of the Water Neutrality Appropriate Assessment</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 following documents relating to the likely impacts of development on designated sites, protected and Priority species and habitats and the identification of proportionate mitigation:

- [REDACTED] Monitoring Report (The Ecology Partnership, July 2025)
- 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] Monitoring Report (The Ecology Partnership, December 2022)

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 note that the Bat Activity Surveys (The Ecology Partnership, January 2023) indicates that the bat transect surveys were undertaken in May, June, July, August, September and October 2022 and states that the report is valid for two years. Therefore, the Bat Activity Surveys (Ecology Partnership, January 2023) is out of date to support this application, in line with CIEEM Guidance<sup>1</sup> and paragraph 6.2.1 of British Standard (BS) BS42020 'Biodiversity – Code of practice for planning and development 2013' and in accordance with [Government Standing Advice](#).

In addition, we note from the Arboricultural Implications Report (SJA Trees, April 2025) that the following tree will be removed: G20 (Goat Willow); and the following trees will be partially removed: G4 (Goat Willow), G6 (various), G11 (various) and G18 (various). 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).

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<sup>1</sup> CIEEM (2019) Advice note on the Lifespan of Ecological Reports and Surveys - <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

## Hazel Dormouse

We also note that the Dormouse Surveys (The Ecology Partnership, January 2023) indicates that the Hazel Dormouse surveys were undertaken between May and November 2022. Therefore, the Dormouse Surveys (The Ecology Partnership, January 2023) is also out of date to support this application, in line with CIEEM Guidance and paragraph 6.2.1 of British Standard (BS) BS42020 'Biodiversity – Code of practice for planning and development 2013'. [Government Standing Advice](#) states that that you should ask for a survey if either of these apply:

- distribution and historical records suggest hazel dormice may be present
- the development proposal will affect an area of woodland (including deciduous, conifer or mixed woodland), hedgerow or scrub

The results of the surveys for bats and Hazel Dormouse 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 support the implementation of the Precautionary Method Statement for [REDACTED] in the [REDACTED] Monitoring Report (The Ecology Partnership, July 2025). This is because the survey confirmed that the sett observed is in active use and appears to be a main breeding sett with connections to outlier setts to the south and west of the site. This needs to be secured by a condition of any consent and implemented in full.

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.

**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.*