



Date: 5 February 2026

Our ref: 13406

Shazia Penne
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

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.

Application: DC/26/0010
Location: Land North of Girder Bridge, Gay Street Lane, North Heath RH20 2HW
Proposal: Use of land for the stationing of 6 static caravans for residential purposes (to be occupied by Gypsies and Travellers) and associated landscape works.

Thank you for consulting Place Services on the above application.

| | |
|---|-------------------------------------|
| No ecological objection | <input type="checkbox"/> |
| No ecological objection subject to attached conditions | <input type="checkbox"/> |
| Further information required/Temporary holding objection: <ul style="list-style-type: none">• European Protected Species (Hazel Dormouse) | <input checked="" 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 Councils advice regarding Water Neutrality requirements following Natural England's Withdrawal Statement \(31st October 2025\).](#)

Summary

We have reviewed the Reptile Survey Report and Mitigation Method Plan (Sylvatica Ecology Ltd., December 2025), Dormouse Survey Report (Sylvatica Ecology Ltd., December 2025) and Preliminary Ecological Assessment (Sylvatica Ecology Ltd., March 2025) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures. Please note that comments on mandatory biodiversity net gain are provided by Horsham District Council in-house.

We are not satisfied that there is sufficient ecological information available for determination of this application and recommend that details of survey results, mitigation and enhancement measures for Hazel Dormouse are required to make this proposal acceptable. The reasons for this are outlined below:

European Protected Species – Hazel Dormouse

We understand from the Dormouse Survey Report (Sylvatica Ecology Ltd., December 2025) that an additional survey is required in May to meet the recommended survey effort. This survey is in accordance with [Government Standing Advice](#) which says that you should ask for a survey if:

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

We note that surveys completed between July and November 2025 recorded no evidence of Hazel Dormouse, however the additional survey during May is required to provide the necessary evidence of the presence/absence of this species.

The survey information for Hazel Dormouse is 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.

See Appeal Decisions Ref: APP/P1560/W/24/3344547 at The Oaks, Clacton Road Weeley Essex CO16 9EF and APP/W3520/W/17/3174638 Pooles Farm, Thorney Green Road, Stowupland IP14 4AJ, where the appeals were dismissed as one of the main issues was the effect of the proposal on protected species. The Inspector could not be sure that there would be no adverse effect on protected species in the absence of ecological information. We also highlight that this information is also requested by the Inspector even where ecology has not been a reason for refusal.

Furthermore, the Local Planning Authority, as a competent authority, should have regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) when reaching planning decisions and must not leave this until the licence

application stage. Therefore, if a European Protected Species Mitigation Licence is required for this application, appropriate mitigation measures to support the provision of the licence must also be outlined prior to determination to allow certainty to the LPA that a licence will likely be granted.

This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).

Additional Comments

We note from the Preliminary Ecological Assessment (Sylvatica Ecology Ltd., March 2025) that there are no buildings on site which will be impacted by the works and therefore no bat surveys in relation to buildings are required. We also understand from Section 6.6 of the Preliminary Ecological Assessment (Sylvatica Ecology Ltd., March 2025) that the treeline of oak trees on the western boundary is not due to be impacted under the current proposals, but if the proposals should change, then we highlight that Ground Level Tree Assessment for bats will be required on these trees.

We support the Reptile Survey Report and Mitigation Method Plan (Sylvatica Ecology Ltd., December 2025) and understand that, following appropriate reptile surveys, the translocation of Slow Worm, Common Lizard and Grass Snake took place between April and October 2025. There was a good population of Slow Worm and low populations of Common Lizard and Grass Snake on site. We support the reptile mitigation strategy in the Reptile Survey Report and Mitigation Method Plan (Sylvatica Ecology Ltd., December 2025), including the receptor site preparation and note that the two receptor sites are identified in Section 6.

We also support the Precautionary Method Statement for mobile protected and Priority species (including Hedgehog, which is a threatened and Priority species) in Section 6.9 of the Preliminary Ecological Assessment (Sylvatica Ecology Ltd., March 2025). This needs to be secured by a condition of any consent and implemented in full.

If external lighting is required, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Ecological Assessment (Sylvatica Ecology Ltd., March 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 also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Preliminary Ecological Assessment (Sylvatica Ecology Ltd., March 2025) 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 support a lawful decision and overcome our holding objection.

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

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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.*
- *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.*