



Date: 14 October 2025

Our ref: 08825

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

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/25/1312
Location:	Land West of Ifield Charlwood Road Ifield West Sussex
Proposal:	Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising: A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside: An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition. This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way.

Thank you for consulting Place Services on the above hybrid 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 comments on the conclusion of the Water Neutrality AA	<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 unless they can demonstrate water neutrality.

Summary

We have reviewed the documents submitted, including the following documents 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 Biodiversity Net Gain are provided by Horsham District Council in-house.

- Building Demolition Plan (Prior+PTNRS, May 2025)
- Phase 1 Ecological Mitigation Strategy (Arcadis, June 2025)
- Illustrative Landscape Masterplan (GILLESPIES, April 2025)
- Landscape Parameter Plan (Prior+PTNRS, May 2025)
- Environmental Statement, Chapter 8: Biodiversity and Appendices 8 (July 2025)
- Shadow Habitats Regulation Assessment Appropriate Assessment (WSP, July 2025)
- Lighting Impact Assessment (DFL, June 2025)
- Natural England Consultation Response (ref: 526484, 1st October 2024)

We are satisfied that there is sufficient ecological information available to support determination of this application. However, 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](#).

Designated sites:

The site lies outside the Wider Conservation Area for Ebernoe Common SAC and The Mens SAC. Natural England have reviewed the submitted Shadow Habitats Regulations Assessment stating *"The appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any planning permission given."* We are in agreement with Natural England's comments.

Bats:

Various surveys for bats, including emergence surveys, Ground Level Tree Assessments and static bat detector surveys have been ongoing at the site for several years. The surveys

have consistently recorded several day roosts of Common and Soprano Pipistrelle in building and trees and a maternity roost of Brown Long-eared bat. Additionally, the 2024 data has identified that two known breeding populations of Bechstein's bat have been utilising the site.

Regarding the Bechstein bat records the Natural England Consultation Response (ref: 526484, 1st October 2024) states they have consulted a national specialist and will be providing updated comments on this: *"Bechstein's Bat Species: Natural England provided advice on this site throughout 2024 as part of Horsham's Local Plan review process, confirming in a letter dated 17 July 2024 (our reg. 482468) that Hyde Hill Wood and the immediate surrounding area supports a notable population of Bechstein's bats. We note that further information has been submitted as part of this application, which our national bat specialist is currently reviewing. Our comments on impacts to Bechstein's bat species as a result of this development will be submitted separately, by the 23 October 2025."* The LPA should refer to Natural England's comments on impacts upon Bechstein's Bat.

As for the identified bat roosts, as detailed above, a copy of the licence or evidence of site registration supplied by an individual registered to use a Bat Mitigation Class Licence should be submitted to the LPA as proof and secured by a condition of any consent. Due to the scale of the proposals and the phasing which is proposed it will likely be necessary to undertake updated bat surveys as part of the licencing process. In terms of this hybrid planning application, any buildings proposed to be demolished within the outline portion of the application, it may be necessary to undertake updated emergence surveys on buildings which did not identify a bat roost to inform the Reserved Matter application. Should the LPA be minded to grant permission, precautionary mitigation measures relating to the demolition of buildings with bat roost potential, which did not have confirmed bat roosts should be detailed within a Construction Environmental Management Plan (CEMP): Biodiversity and secured by a condition of any consent. The CEMP: Biodiversity should also include precautionary measures relating to the protection of trees with bat roost potential and hedge lines.

An increase in artificial light would negatively impact bats. We recommend lighting details are outlined within a wildlife sensitive lighting scheme, in line with best practice guidance GN:08/23 from the Institute of Lighting Professionals¹ and are informed by the Lighting Impact Assessment (DFL, June 2025) and the results of the bat surveys (Environmental Statement, Chapter 8: Biodiversity and Appendices 8 (July 2025)). The wildlife sensitive lighting scheme should be secured by a condition of any consent.

Birds

The surveys identified numerous bird species breeding and over wintering onsite. We are satisfied the impacts upon birds has been appropriately assessed. We recommend the need for a Farmland Bird Compensatory Strategy. The location of any required off-site compensation for ground nesting birds will need to be secured by a legal agreement, additionally, we recommend the need for further details of compensation measures in a Farmland Bird Mitigation Strategy, which should be secured by a condition of any consent, should the LPA be minded to grant permission.

Reptiles

¹ <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

Surveys showed good populations of Common Lizard, Grass Snake and Slow Worm present across the entire site. Mitigation will require onsite displacement, which we are satisfied is suitable for species such as Slow Worm, rather than an off-site translocation. We recommend the mitigation for each phase is detailed within a Biodiversity Method Statement and we also recommend the need for a Construction Environmental Management Plan (CEMP): Biodiversity and both secured by a condition of any consent. Compensation will be required to enhance the new habitats and to increase the areas carrying capacity for reptiles.

CONFIDENTIAL: [REDACTED]

We have reviewed the CONFIDENTIAL: [REDACTED] Survey Report (Ramboll, January 2024). We would like to highlight that the results of this survey report are technically out of date for [REDACTED] survey results. However, due to the scale and the proposed phasing of this development, ongoing surveys will be needed, as such we are satisfied with the age of this ecological data in this instance. The submitted information has identified [REDACTED] as present across the entire site and requiring mitigation. It is our understanding that the setts will be retained where possible. But due to some of the impacts, there will be a need to interfere with the setts in some instances. As such a licence will be required and this will need to be secured by a condition of any consent. We are satisfied that detailed mitigation for each phase, which will include the need for an updated site walkover would be appropriate. We recommend the mitigation for each phase is detailed within a Biodiversity Method Statement to ensure the mitigation strategy is appropriate for that section and we also recommend the need for a Construction Environmental Management Plan (CEMP): Biodiversity and both secured by a condition of any consent.

Additional comments:

Otter, Dormouse and Water Vole were surveyed and assessed but none were found to be present on site. Updated site walkovers to inform the mitigation due to this being a large scale phased development are likely to be necessary. Otters are a mobile species; updated assessments may be required to inform the Reserved Matter application. For Dormouse this could include the use of footprint tunnels. We recommend the precautionary mitigation for each phase is detailed within a Biodiversity Method Statement and we also recommend the need for a Construction Environmental Management Plan (CEMP): Biodiversity and both secured by a condition of any consent. We advise that any artificial lighting needs to avoid any spillage into the river corridor as otters and other nocturnal species are likely to be using it at night.

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 Environmental Statement, Chapter 8: Biodiversity and Appendices 8 (July 2025) and the Phase 1 Ecological Mitigation Strategy (Arcadis, 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). Reasonable biodiversity enhancement measures are a separate to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Enhancement Strategy to be secured as 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 Environmental Statement, Chapter 8: Biodiversity and Appendices 8 (July 2025) and the Phase 1 Ecological Mitigation Strategy (Arcadis, June 2025) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This will 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).

Conditions Relating to the Outline Application:

2. CONCURRENT WITH EACH PHASE OF RESERVED MATTERS: FURTHER SURVEYS FOR DEVELOPMENTS PHASED OVER A LONG PERIOD

“Where the approved development is to proceed in a series of phases, further supplementary ecological surveys for bats and [REDACTED] and if considered necessary by a suitably qualified ecologist Dormice, Otter and Water Vole shall be undertaken to inform the preparation and implementation of corresponding phases of ecological measures required through Condition(s). The supplementary surveys shall be of an appropriate type for the above species and survey methods shall follow national good practice guidelines.

Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and approved in writing by the local planning authority prior to the commencement of development.

Works will then be carried out in accordance with the proposed new approved ecological measures and timetable.”

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)

3. CONCURRENT WITH EACH PHASE OF RESERVED MATTERS: PRIOR TO COMMENCEMENT OF ANY WORKS WHICH WILL IMPACT THE BREEDING / RESTING PLACE OF BATS: SUBMISSION OF A COPY OF EPS MITIGATION LICENCE OR EVIDENCE OF SITE REGISTRATION UNDER A BAT MITIGATION OR EARNED RECOGNITION CLASS LICENCE FOR BATS

“Any works which will impact the breeding / resting place of bats, shall not in in any circumstances commence unless the local planning authority has been provided with either:

- a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or
- b) evidence of site registration supplied by an individual registered to use a Bat Mitigation or Earned Recognition Class Licence; or
- c) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence.”

Reason: To conserve protected 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 s17 Crime & Disorder Act 1998.

4. CONCURRENT WITH EACH PHASE OF RESERVED MATTERS: PRIOR TO COMMENCEMENT OF ANY WORKS WHICH WILL IMPACT [REDACTED] ACTION REQUIRED: SUBMISSION OF A COPY OF THE MITIGATION LICENCE FOR [REDACTED]

“The following sett closure shall not in in any circumstances commence unless the local planning authority has been provided with either:

- a) *a licence issued by Natural England pursuant [REDACTED] Protection Act 1992 authorizing the specified activity/development to go ahead;*
- b) *evidence of site registration supplied by an individual registered to use a [REDACTED] Mitigation Class Licence; or*
- c) *a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence.”*

Reason: To conserve protected species and allow the LPA to discharge its duties under and [REDACTED] Protection Act 1992 and s17 Crime & Disorder Act 1998.

5. CONCURRENT WITH EACH PHASE OF 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

(bats, Dormouse, Otter, Water Vole, reptiles, [REDACTED] 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.

6. **CONCURRENT WITH EACH PHASE OF 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).

7. CONCURRENT WITH EACH PHASE OF RESERVED MATTERS: PRIOR TO COMMENCEMENT: FARMLAND BIRD COMPENSATION STRATEGY

“A Farmland Bird Compensation Strategy shall be submitted to and approved by the local planning authority to compensate the loss or displacement of any Farmland Bird territories identified as lost or displaced. This shall include provision of offsite compensation in nearby agricultural land, prior to commencement.

The content of the Farmland Bird Compensation Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed compensation measure e.g. Skylark plots;*
- b) detailed methodology for the compensation measures e.g. Skylark plots must follow Agri-Environment Scheme option: ‘AB4 Skylark Plots’;*
- c) locations of the compensation measures by appropriate maps and/or plans;*
- d) persons responsible for implementing the compensation measure.*

The Farmland Bird Compensation Strategy shall be implemented in accordance with the approved details and all features shall be retained for a minimum period of 10 years.”

Reason: To allow the LPA to discharge its duties under the NERC Act 2006 (as amended)

8. CONCURRENT WITH EACH PHASE OF 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 in line with the recommendations of the, 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).

9. CONCURRENT WITH EACH PHASE OF RESERVED MATTERS PRIOR TO BENEFICIAL USE: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

“Prior to beneficial use and 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).

Conditions Relating to the Full Application:

10. PRIOR TO COMMENCEMENT OF ANY WORKS WHICH WILL IMPACT [REDACTED] ACTION REQUIRED: SUBMISSION OF A COPY OF THE MITIGATION LICENCE FOR [REDACTED]

“The following sett closure shall not in in any circumstances commence unless the local planning authority has been provided with either:

- d) a licence issued by Natural England pursuant [REDACTED] Protection Act 1992 authorizing the specified activity/development to go ahead;*
- e) evidence of site registration supplied by an individual registered to use a [REDACTED] Mitigation Class Licence; or*
- f) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence.”*

Reason: To conserve protected species and allow the LPA to discharge its duties under and [REDACTED] Protection Act 1992 and s17 Crime & Disorder Act 1998.

11. 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.

- i) Risk assessment of potentially damaging construction activities.*
- j) Identification of “biodiversity protection zones”.*
- k) 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).*
- l) The location and timing of sensitive works to avoid harm to biodiversity features.*
- m) The times during construction when specialist ecologists need to be present on site to oversee works.*
- n) Responsible persons and lines of communication.*
- o) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- p) 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).

12. 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 in line with the recommendations of the, shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Enhancement Strategy shall include the following:

- f) Purpose and conservation objectives for the proposed enhancement measures;*
- g) detailed designs or product descriptions to achieve stated objectives;*
- h) locations of proposed enhancement measures by appropriate maps and plans (where relevant);*
- i) persons responsible for implementing the enhancement measures; and*
- j) 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).

13. PRIOR TO BENEFICIAL USE: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

“Prior to beneficial use, 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:

- c) 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*
- d) 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 do not hesitate to contact us if you have any queries in relation to this advice.

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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.