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Horsham District Council
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Our ref: 14067
Date: 5 February 2026

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.

Application: DC/25/1922
Location: Land West of Bines Road Bines Road Partridge Green West Sussex
Proposal: Development of 101 dwellings (including 45% affordable), creation of new access, public open space, creation of a cycle path, allotments, and associated landscaping.

Thank you for re-consulting Place Services on the above 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 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 following supplied by the applicant, relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house. Additionally, we have commented on all other ecological matters excluding Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the NatureSpace Partnership.

Reviewed 15th January 2026:

- Location Plan (ECE Architecture, March 2022)
- Proposed Site Layout (ECE Architecture, November 2022)
- Lighting Strategy (DFL, August 2024)
- Horizontal Illuminance Lux Plan (DFL, October 2024)
- Reptile Survey Report (Ecology Partnership, October 2024)
- Breeding Bird Survey Report (Ecology Partnership, October 2024)
- Bat Activity Survey (Ecology Partnership, October 2024)
- Technical Response – Place Services Ref 13th January 2025 (Ecology Partnership, January 2025)

Reviewed 5th February 2026:

- Update Ecological Walkover Survey (Ecology Partnership, January 2026)

We are now satisfied that there is sufficient ecological information available for determination of this application. The reasons for this are outlined below:

It is our understanding that no trees are now proposed to be removed, particularly any trees from group G10, which the updated ecological assessment states have bat roost potential (no further detail on the level of bat roost potential provided). The update Ecological Walkover Survey (Ecology Partnership, January 2026) states if trees from G10 were to be removed this could result in the loss of bat roost resources. Should the LPA be minded to grant permission, we recommend trees within G10 are protected from construction activities to ensure no potential roost features are impacted. This should be detailed within a Construction Environmental Management Plan (CEMP): Biodiversity and secured by a condition of any consent.

We note the landscape and Arboricultural consultants have commented on the mitigation measures for the onsite Veteran tree, which is an irreplaceable habitat. We are in agreement with their comments, that the buffer zone should not be encroached.

An increase in artificial light would negatively impact foraging 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 secured by a condition of any consent.

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

We previously highlighted that an updated site walkover was required to inform whether the mitigation measures within the out of date reports were still suitable. The applicant has now provided an update Ecological Walkover Survey (Ecology Partnership, January 2026). [REDACTED]

[REDACTED]. Section 5.3 of the update Ecological Walkover Survey (Ecology Partnership, January 2026) recommends an updated site walkover is undertaken prior to construction commencement, should the LPA be minded to grant permission, [REDACTED] to determine if a licence might be required. [REDACTED]

We note we are still satisfied the mitigation measures for Dormouse, reptiles and breeding birds, as submitted with the previous application and again for this application are still appropriate.

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 Reptile Survey Report (Ecology Partnership, October 2024), Breeding Bird Survey Report (Ecology Partnership, October 2024), Bat Activity Survey (Ecology Partnership, October 2024), Technical Response – Place Services Ref 13th January 2025 (Ecology Partnership, January 2025) and Update Ecological Walkover Survey (Ecology Partnership, January 2026) 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 matter 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) and delivery of mandatory Biodiversity Net Gain.

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 Reptile Survey Report (Ecology Partnership, October 2024), Breeding Bird Survey Report (Ecology Partnership, October 2024), Bat Activity Survey (Ecology Partnership, October 2024), Technical Response – Place Services Ref 13th January 2025 (Ecology Partnership, January 2025) and Update Ecological Walkover Survey (Ecology Partnership, January 2026) 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).

2. 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) Results of a updated site walkover prior to commencement [REDACTED]*
- d) 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).*
- e) The location and timing of sensitive works to avoid harm to biodiversity features.*

- f) *The times during construction when specialist ecologists need to be present on site to oversee works.*
- g) *Responsible persons and lines of communication.*
- h) *The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- i) *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).

3. **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, 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).

4. **PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**

“Prior to 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).

Please 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



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.