



Date: 4 June 2025

Our ref: 04732

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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/25/0403  
**Location:** Full Planning Application to form a comprehensive masterplan including: 1. Rationalisation and enhancement of existing commercial facilities (Use Classes E(g) B2 and B8 at Stonehouse Business Park including demolition of two buildings and their replacement with new Class E(g), B2 and B8 facilities. Extension of existing building to form a new office and wardens' accommodation. Existing mobile home removed. 2. Decommissioning of the Anaerobic Digester and re-use of the existing 2no buildings for storage and office uses (Class E (g) and B8) and the diversion of a public footpath. 3. Residential redevelopment of the Jacksons Farm site including the demolition of existing barns to provide 3no. dwellings with access, parking, and landscaping.  
**Proposal:** Stonehouse Farm Handcross Road Plummers Plain West Sussex RH13 6NZ

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>Requires further information on European Protected Species (Hazel Dormouse)</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 Ecological Impact Assessment (CSA Environmental, February 2025), 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 details of survey results and mitigation measures required to make this proposal acceptable are provided prior to determination. The reasons for this are outlined below:

#### **European Protected Species: Hazel Dormouse**

We note there are three Hazel Dormouse records within 2km of the site, the hedgerows around the site contain suitable habitat for this species and the hedgerows are connected to the wider landscape. We understand from Section 5.32 (Anaerobic Digester Plant and Main Livestock Building) that c29m of hedgerow H28 and c2m of hedgerow H10c will be removed and from Section 5.61 that hedgerow H13 will be replanted and extended. We therefore agree that a non-licensed Precautionary Method Statement for Hazel Dormouse is required (Section 5.84 of the Ecological Impact Assessment (CSA Environmental, February 2025)) and highlight that this should be submitted to the LPA prior to determination in accordance with [Government Standing Advice](#).

The submission of the non-licensed Precautionary Method Statement 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.

### **Additional comments**

We note from the Ecological Impact Assessment (CSA Environmental, February 2025) that Buildings B3 and B4 have low bat roost potential and therefore a single dusk emergence survey was undertaken on these buildings in June 2024. We understand that no evidence of bat roosts was observed. We note that Buildings B1, B2 and B5 have negligible bat roost potential and that Building B6 will not be impacted by the works. We also understand from Section 4.88 of the Ecological Impact Assessment (CSA Environmental, February 2025) that no trees will be impacted by the works. We therefore agree that no further surveys for bats are required.

We also note there are no watercourses or riparian habitats onsite or close to the site and we therefore agree that no surveys or precautionary measures are required for aquatic species, including Otter and Water vole.

We support the Precautionary Method Statement for mobile protected species (including reptiles, common amphibians and Hedgehog, which is a Priority and threatened species) in Sections 5.80 and 5.90 – 5.93 of the Ecological Impact Assessment (CSA Environmental, February 2025). This should be secured by a condition of any consent and implemented in full.

Barn Owls are included in Schedule 1 of the Wildlife & Countryside Act 1981 which affords them protection against disturbance whilst nesting in addition to the basic level of protection of Barn Owls afforded to most wild birds. We therefore support the recommendation for two presence/absence surveys for Barn Owl prior to works starting on Building B2 in Section 5.87 of the Ecological Impact Assessment (CSA Environmental, February 2025). This should be secured by a condition of any consent.

We also support the recommendation in Section 5.4 of the Ecological Impact Assessment (CSA Environmental, February 2025) for a Construction Environmental Management Plan (CEMP) for this application. This needs to be secured by a condition of any consent.

We support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Ecological Impact Assessment (CSA Environmental, February 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 support the proposed reasonable biodiversity enhancements, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 180d and 186d of the National Planning Policy Framework (December 2023). The reasonable biodiversity enhancement measures should be outlined within a 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 contact us with any queries.

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

**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.*