



Date: 07 April 2026

Our ref: 15574

Matthew Porter  
Horsham District Council  
Parkside  
Horsham  
West Sussex  
RH12 1RL

By email only:

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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/26/0322  
**Location:** Steyning Grammar Upper School Shooting Field Steyning West Sussex BN44 3RX  
**Proposal:** Part-demolition of existing teaching buildings, MUGAs and all-weather pitch. Construction of replacement 2-storey and 3-storey teaching buildings, flood-lit all-weather pitch and hard surfaced sports courts, with associated access, parking, landscaping and infrastructure.

Thank you for 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 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 Ground Level Tree Assessment (MKA Ecology Ltd., February 2026), Preliminary Ecological Appraisal Technical Summary Note (MKA Ecology Ltd., December 2025), Bat Presence and Absence Surveys (Brindle & Green Ltd, October 2025) and Preliminary Ecological Appraisal (Geosphere Environmental, January 2023), 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 note from the Preliminary Ecological Appraisal Technical Summary Note (MKA Ecology Ltd., December 2025) and Bat Presence and Absence Surveys (Brindle & Green Ltd, October 2025) that a single dusk emergence survey in August 2025 confirmed there was no evidence of roosting bats in buildings B4 (sports/exam hall), B5 (classroom, flat roofed) and B7 (single storey, flat roofed building including boiler room tower). A further single dusk emergence survey in August 2025 confirmed there was no evidence of roosting bats in building B11 (single storey pitched-roof office).

We also note from the Bat Presence and Absence Surveys (Brindle & Green Ltd, October 2025) that the following buildings have negligible bat roost potential: buildings B1, B2, B3, B4 and B6 which are all single storey, flat roofed buildings; B8 (two storey, flat roofed building); B9 (single storey dining hall and kitchen); B10 (partial single and double storey, flat roofed classroom) and B12 (leisure centre building).

In addition, we understand from the Ground Level Tree Assessment (MKA Ecology Ltd., February 2026) that from a total of 31 trees to be removed during the development, trees T30 (Oak), T35 (Beech) and T67 (Mulberry) have Potential Roost Features for individual bats (PRFs-I). We therefore highlight that 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). We also highlight that a non-licensed Precautionary Working Method Statement 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

We also understand from the Ground Level Tree Assessment (MKA Ecology Ltd., February 2026) that T1 (Lime), T56 (Silver birch), T57 (Lime), T58 (Lime), T62 (Maple sp.), T65 (Norway maple), W2 (Beech, Oak, Sweet chestnut) are classified as requiring further assessment, but that these trees will be retained within the development. We highlight that if these trees will be impacted during the development through removal or pruning, then further assessment for roosting bats will be required.

We support the recommendation in the Preliminary Ecological Appraisal (Geosphere Environmental, January 2023) for the implementation of a Precautionary Method Statement for reptiles and mobile protected and Priority species (including Hedgehog, which is a Priority and threatened species). This should be secured by a condition of any consent and implemented in full.

We are satisfied that there is sufficient ecological information available for determination of this application. We have no objections on ecological matters excluding Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the [NatureSpace Partnership](#).

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 Ground Level Tree Assessment (MKA Ecology Ltd., February 2026), Preliminary Ecological Appraisal Technical Summary Note (MKA Ecology Ltd., December 2025), Bat Presence and Absence Surveys (Brindle & Green Ltd, October 2025) and Preliminary Ecological Appraisal (Geosphere Environmental, January 2023) 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, which includes bats, reptiles and mobile protected and Priority species. The finalised measures should be provided in a Construction and Environmental Management Plan - Biodiversity to be secured as a pre-commencement condition of any consent.

We support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Ground Level Tree Assessment (MKA Ecology Ltd., February 2026)) 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 Ground Level Tree Assessment (MKA Ecology Ltd., February 2026), Preliminary Ecological Appraisal Technical

Summary Note (MKA Ecology Ltd., December 2025), Bat Presence and Absence Surveys (Brindle & Green Ltd, October 2025) and Preliminary Ecological Appraisal (Geosphere Environmental, January 2023), 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.

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 Ground Level Tree Assessment (MKA Ecology Ltd., February 2026), Preliminary Ecological Appraisal Technical Summary Note (MKA Ecology Ltd., December 2025), Bat Presence and Absence Surveys (Brindle & Green Ltd, October 2025) and Preliminary Ecological Appraisal (Geosphere Environmental, January 2023), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.*

*This may 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: A PRECAUTIONARY METHOD STATEMENT FOR REPTILES AND MOBILE PROTECTED AND PRIORITY SPECIES**

*“A Precautionary Method Statement for reptiles and mobile protected and Priority species shall be submitted to and approved in writing by the local planning authority. This will contain precautionary mitigation measures and/or works to reduce potential impacts to reptiles and mobile protected and Priority species during the construction phase.*

*The measures and/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) and s40 of the NERC Act 2006 (as amended).

### 3. **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).

### 4. **PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY**

*“Prior to any works above slab level, a Biodiversity Enhancement Strategy for protected and Priority or 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 and Priority species & habitats and allow the LPA to discharge its duties under paragraph 187d of NPPF 2024 and s40 of the NERC Act 2006 (as amended) and Policy 31 of the Horsham Development Framework.

## 5. **PRIOR TO BENEFICIAL USE: 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 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) and Policy 31 of the Horsham Development Framework.

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**

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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.