



The Ecology Co-op

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6th October 2026

Application Reference: DC/26/1168 – Land North of Melton Drive, Storrington, West Sussex

Place Services Reference: 21622

Our ref: P2400 Land at Northlands Lane

Dear Mr Porter,

This letter serves as an addendum to the Ecological Impact Assessment (EclA)¹ submitted as part of the above application as requested by Place Services in their comments submitted to Horsham District Council on 8th September 2026.

This addendum provides further ecological information on the following two points raised by Place Services:

1. ***“Protected species and habitats***

We note that the red line boundary in the Ecological Impact Assessment (The Ecology Co-op April 2026) does not include the access to the west, which is shown on the Horsham District Council Planning Portal as within the red line boundary. We therefore recommend that an addendum or updated ecology report is submitted to include the access element of the application.”

2. ***“Additional Comments***

The site lies approximately 9.1km southeast of The Mens Special Area of Conservation (SAC) (MAGIC maps) and is therefore within the 12.0km Wider Conservation Area for this SAC, within which significant impacts or severance to flightlines must be considered...”

¹ The Ecology Co-op (2026). *Land at Northlands Lane – Ecological Impact Assessment*.

The submitted EclA focusses on surveys and associated impact assessments relating to the development field (shown in green in Figure 1), however Place Services have correctly identified that the assessment must acknowledge the area included within the submitted red line boundary which extends further to the west for access purposes only. This red line boundary covers part of a previous application (DC/24/2006) for which Outline planning permission was permitted in December 2025 (Figure 2). Survey results for The Mens SAC, habitats and protected species are re-assessed below using the information contained within the EclA submitted under the DC/24/2006, produced by RSK Biocensus², in combination with that submitted under the current DC/26/1168 application, produced by The Ecology Co-op¹.



Figure 1. The location plan taken from the Ecological Impact Assessment¹, showing the field to be developed highlighted in green with the land to the west included to facilitate access only.

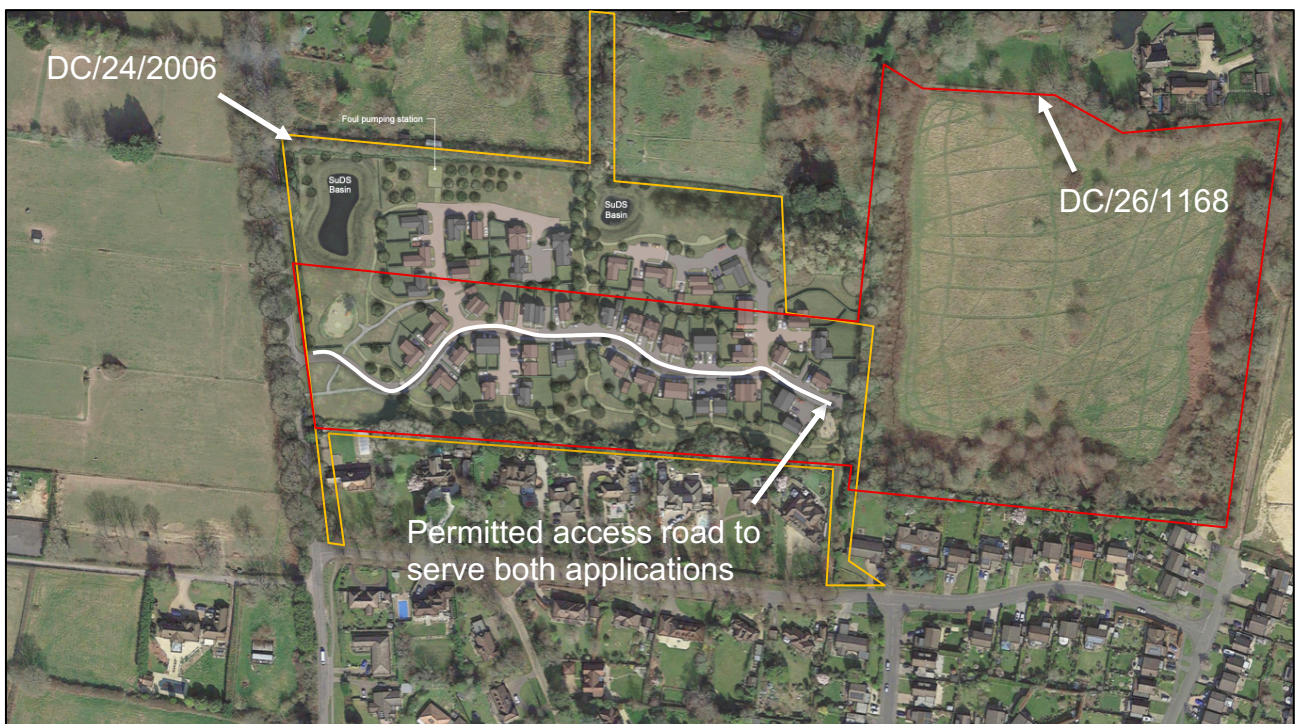


Figure 2. The approved masterplan for DC/24/2006 (outlined in yellow) showing the access route through the area of land included within DC/26/1168 (shown in red). Application boundaries are approximate and for illustrative purposes only. Basemap and plan taken from Re-Format (Drawing No. P19038 - RFT- XX – XX - - DR A- 0100).

² RSK Biocensus (2024) *Land north of Melton Drive, Storrington – Ecological Impact Assessment*.

The Mens SAC

The Mens SAC is located approximately 9.1km northwest of the site, its population of barbastelle bats is a qualifying feature for the designation. The EclA for the current application incorporated static bat detector deployments in Spring, Summer and Autumn: a total of 25 barbastelle registrations were recorded across this period and constituted <1% of all bat calls recorded. The Night-time Bat Walkover Surveys (NBWSs) which served to supplement the static detector data did not record the species in Spring or Summer but did note two registrations on-site and a further three off-site in October.

Section 4.3.2 of the EclA for the current application assessed the impact on bats, in the absence of mitigation, as significant up to a local level. Implementation of avoidance (section 5.3.1) in the form of habitat retention, and mitigation (section 5.3.2) in the form of sensitive lighting was deemed to result in no residual impacts on bat activity.

The RSK Biocensus data for the DC/24/2006 application contained a total of 390 barbastelle registrations from static detectors across the 2024 Spring, Summer and Autumn deployments. The species was not recorded during the 2024 NBWS.

Sections 4.1.6 – 4.1.9 of the RSK Biocensus EclA discuss the potential impacts on The Mens SAC. The assessment concludes that the development (DC/24/2006 – permitted in 2025) “*will have no impact on the Mens SAC*” this conclusion was based on the retention of suitable foraging habitat and adoption of sensitive lighting schemes, whilst also acknowledging barbastelles have an average core sustenance zone of 7km but can forage beyond this range. Section 4.1.63 of the EclA states the residual impact on bat activity as a whole (for all species) is not considered significant.

Both EclAs confirm the development will have no significant impacts on bat activity independently. With the retention of high-value bat foraging habitat and adoption of sensitive lighting it is considered that there will be no foreseeable impacts on bat activity, including barbastelles and The Mens SAC by extension, in combination.

Habitats

The proposed access route included within the current application will see the permanent loss of an area of g3c – other neutral grassland and partial loss of an area of h3d – bramble scrub (Figure 3). Neither of these habitats are considered priority under Section 41 of the Natural Environment and Rural Communities (NERC) Act, 2006. Table 23 of the EclA for the current application assesses the loss of neutral grassland as being significant at the local level, incorporating the loss of habitat for the new access road into this assessment is not considered to raise the level of impact beyond this.

The site will need to demonstrate a 10% net gain in Biodiversity to comply with the Environment Act, 2021.



Protected/Notable Species

Bats

As stated in this addendum, with the adoption of avoidance and mitigation measures the proposed development (including the proposed access road) will have no foreseeable impacts on bats. The assessment within the submitted EclA is considered valid.

Breeding Birds

The RSK Biocensus EclA identified only minor adverse impacts on birds with a neutral residual effect following avoidance and mitigation measures, when viewed in combination with The Ecology Co-op's EclA, which identifies a significant residual effect (assumed to be at the local level) it should be concluded that incorporating the access road in the assessment for DC/26/1168 would not increase the level of impact on breeding birds beyond that already reported in the EclA.

Badgers

The Ecology Co-op's EclA did not record any badger setts or evidence of badgers (section 3.4.1), however acknowledges that foraging badgers may use the site and assesses the site as being of importance to badgers at site level only (section 3.4.3).

2024 surveys by RSK Biocensus reported an outlier badger sett immediately adjacent to the current (DC/26/1168) application boundary (see Figure 4). The impact assessment for badgers is redacted from the RSK Biocensus report. The proposed access road will likely impact upon the outlier sett in combination with the permitted DC/24/2006 development. With the adoption of reasonable avoidance measures and mitigation (likely requiring closure of the sett under a Natural England licence) the loss of a single outlier sett will have a neutral effect on the local badger population.



Figure 4. A plan produced by RSK Biocensus² for DC/24/2006 showing the results of badger surveys. The area of land included within the current application (DC/26/1168) is shown in red. The application boundary is approximate and for illustrative purposes only.

Dormice

2024 surveys by RSK Biocensus confirmed the presence of dormice within the scrub habitat through which the proposed access road will run (Figure 5). Both EclAs assessed the site as being of value to dormice at the local level. The Ecology Co-op report identifies potential impacts through disturbance and increased predation risk during the operational phase, the RSK Biocensus report also highlights these impact pathways as well as the potential loss of small amount of habitat. A moderate adverse effect in the absence of avoidance/mitigation/compensation was reported.

It is confirmed that the proposed access road, which forms a material part of the DC/26/1168 application, will result in significant impacts on dormice through direct habitat loss. In the absence of compensation this would see a permanent negative impact significant at the local level. Given this assessment a European Protected Species (dormouse) mitigation licence is considered necessary for the proposed development to proceed. Mitigation measures are set out in section 5.5.2 of the EclA.



Figure 5. A plan produced by RSK Biocensus² for DC/24/2006 showing the results of dormouse surveys. The area of land included within the current application (DC/26/1168) is shown in red. The application boundary is approximate and for illustrative purposes only.

Amphibians

Both EclAs concluded likely absence of great crested newts from their respective survey areas. The Ecology Co-op EclA concluded the site to be of local value to other amphibians (smooth newt *Lissotriton vulgaris*, palmate newt *L. helveticus*, common frog *Rana temporaria* and common toad *Bufo bufo*). Given the conservation status of these species the reported level of impact (site level) within the EclA is considered appropriate when assessed for the whole site (including access road).

Reptiles

The Ecology Co-op EclA recorded populations of slow worm *Anguis fragilis*, common lizard *Zootoca vivipara* and grass snake *Natrix helvetica* and identified impacts on reptiles at the local level. The RSK Biocensus study recorded a single grass snake. incorporating the access road in the assessment for DC/26/1168 would not increase the level of impact on breeding birds beyond that already reported in the EclA

I trust this is sufficient for your records.

Kind regards,

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For further information on The Ecology Co-op, please visit www.ecologyco-op.co.uk