5th August 2025

Hannah Darley
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

By email only

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/25/0150**
Location: **Peacocks Paddock Stall House Lane North Heath Pulborough West Sussex RH20 2HR**
Proposal: **Change of Use of land to a travellers caravan site consisting of 1no. mobile home, 1no. touring caravan and 1no. utility dayroom and associated development.**

Dear Hannah

Thank you for re-consulting Place Services on the above application.

a) No ecological harm/No objection	
b) Requires further information	
c) Recommend grant permission subject to conditions	Yes
d) Recommend refusal	
e) Subject to Natural England's formal comments on the conclusion of the Water Neutrality Appropriate Assessment	Yes
f) Subject to Natural England's formal comments on the conclusion of the Bat Appropriate Assessment (HRA screening only)	N/A
g) Discharge of condition	

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 recently submitted 3rd party Ecology Objection (Ecology Solutions, June 2025) and the Technical Note (prepared in response (ProVision, July 2025) as well as the Arboricultural Method Statement, BS5837 report and Tree Protection Plan (all AT&C, July 2025).

These additional comments exclude Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the NatureSpace Partnership and please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We agree with the note from the Preliminary Ecological Appraisal (Pro Vision Ltd., December 2024) that sufficient survey effort has been undertaken on protected species including Dormouse, bats and reptiles, where there is a reasonbable likelihood of the species being present and affected by the development. Where impacts can be avoided using embedded mititgation, it would be unreasonable to request survey and assessment. This meets the requirements set by paragraph 99 of the ODPM Circular 06/2005: "*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" and "..developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development."*

We still consder that the submitted information provides 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. The LPA can therefore demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006 (as amended), the Conservation of Habitats and Species Regulations 2017 (as amended) and prevent wildlife crime under s17 Crime and Disorder Act 1998.

We are therefore still satisfied that there is sufficient ecological information available for determination

This provides certainty for the LPA of the likely impacts on protected and Priority species and appropriate mitigation measures can be secured by a condition of any consent.

The mitigation and enhancement measures identified in the Preliminary Ecological Appraisal (Pro Vision Ltd., December 2024) should be secured by a condition of any consent and implemented in full. This is necessary to conserve and enhance protected and Priority species.

If external lighting is required, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Ecological Appraisal (Pro Vision Ltd., December 2024) 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 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 the 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 recommended previously which are based on BS42020:2013. We support the proposed Conditions 7, 10 and 17 as set out in the Committee report to secure details any planning consent be granted.

Please contact us with any queries.

Yours sincerely

Sue Hooton CEnv MCIEEM BSc (Hons)
Principal Ecological Consultant
Place Services at Essex County Council
placeservicesecology@essex.gov.uk

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.