



Date: 24 March 2026

Our ref: 15150

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Thank you for requesting advice on this outline 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/26/0366
Location: Land North West of Southwater RH13 9AW
Proposal: Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure.

Thank you for consulting Place Services on the above outline application.

No ecological objection	☐
No ecological objection subject to attached conditions	☐
Further information required/Temporary holding objection: • European Protected Species (bats) • Protected species (invertebrates, aquatic invertebrates, wintering and breeding birds)	☒

Recommend Refusal	☐
Subject to Natural England's comments on the conclusion of the LPA's Appropriate Assessment	☐

[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 documents relating to the likely impacts of development on designated sites, protected and Priority species and habitats and the identification of proportionate mitigation:

Main site and Christs Hospital site – valid in-date surveys

- Environmental Statement Vol II, Appendix 8.12 2025 Reptile Survey Report (Hankinson Duckett Associates, February 2026) Surveys undertaken September 2025.
- Environmental Statement Vol II, Appendix 8.9 2025 Water Vole and Otter Report (Hankinson Duckett Associates, February 2026) Surveys undertaken June and October 2025).
- Environmental Statement Vol II, Appendix 8.6 Botanical Survey Report (Hankinson Duckett Associates, February 2026) Surveys undertaken (Survey undertaken May 2019)

Main site only – valid in-date surveys

- Environmental Statement Vol II, Appendix 8.8 2025 Dormouse Report (Hankinson Duckett Associates, February 2026) Surveys undertaken April, June, August, September and November 2025).

Christs Hospital site only – valid in-date surveys

- Environmental Statement Vol II, Appendix 8.13 Christs Hospital 2025 Reptile Survey Report (Hankinson Duckett Associates, February 2026)
- Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal – Christs Hospital (Hankinson Duckett Associates, January 2026),

Main site and Christs Hospital site – surveys out of date

- Environmental Statement Vol II, Appendix 8.15a Invertebrate Survey Report (Ecological Survey and Assessment, February 2026) Surveys undertaken summer 2021 and spring 2022.
- Environmental Statement Vol II, Appendix 8.15b Aquatic Invertebrates Survey Report (Ecological Survey and Assessment, February 2026) Surveys undertaken summer 2021 and spring 2022.
- Environmental Statement Vol II, Appendix 8.7 Bat Survey Report Rev A (Hankinson Duckett Associates, February 2026) Surveys undertaken June 2021 and May and July 2022.
- Environmental Statement Vol II, Appendix 8.11 Wintering and Breeding Bird Assessment (Hankinson Duckett Associates, February 2026) Surveys undertaken between November 2021 and June 2022.

Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We note that there does not appear to be an ecological impact assessment for the main site of approximately 128ha west of Southwater. The Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal – Christs Hospital (Hankinson Duckett Associates, January 2026) relates to the 1.35ha Christs Hospital site only. Therefore, it appears that information on habitats and some protected species has not been submitted for the main site.

We are not satisfied that there is sufficient ecological information available for determination of this application and recommend that details of survey results, mitigation and enhancement measures for bats are required to make this proposal acceptable/additional information on bats is provided prior to determination. The reasons for this are outlined below:

European Protected Species: bats

We note the ecological assessment (Environmental Statement Vol II, Appendix 8.7 Bat Survey Report Rev A (Hankinson Duckett Associates, February 2026) is out of date to support this application, in line with CIEEM Guidance¹ and paragraph 6.2.1 of British Standard (BS) BS42020 'Biodiversity – Code of practice for planning and development 2013'. This is because the surveys for bats were undertaken in June 2021 and May and July 2022. [Government Standing Advice](#) says you should ask for a survey if:

- distribution and historical records suggest bats may be present
- the development site includes or is close to [any built structures](#), on or underground, that provide commuting, foraging or roosting opportunities for bats

The main site lies approximately 11.2km east and the Christs Hospital site approximately 11.3km east of The Mens Special Area of Conservation (SAC). Therefore, both of these sites are within the 12km Wider Conservation Area for the SAC within which significant impacts or severance to flightlines must be considered. This is because the Wider Conservation Area is the full extent of the range of foraging areas required by Barbastelle bats, which are the qualifying feature of the SAC. There is one record for this species within 2km of the site, approximately 1.5km northwest from 2014 (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 149 records of bats within 2km of the site, including Daubenton's, Whiskered, Natterers, Noctule, Brown Long-eared and Soprano and Common Pipistrelle (SxBRC). Four European Protected Species Mitigation Licences have been granted within 2km of the site: a) 1.3km to the north for Brown Long-eared bat and Common Pipistrelle in 2017; b) 1.5km to the north for Brown Long-eared bat and Common Pipistrelle 2015; c) 1.7km to the northeast for Common Pipistrelle and Soprano Pipistrelle 2015; and d) 1.9km to the west for Brown Long-eared and Common Pipistrelle in 2015 ([MAGIC maps](#)).

The main site lies approximately 16.1km east of Ebernoe Common SAC and therefore lies outside the 12km Wider Conservation Area for this SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The main site lies approximately 12.7km northeast of Arun Valley SAC, SPA and Ramsar site.

¹ CIEEM (2019) Advice note on the Lifespan of Ecological Reports and Surveys - <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

Protected species

We highlight that the following reports for invertebrates, aquatic invertebrates and wintering and breeding birds are also out of date in line with CIEEM Guidance¹ and paragraph 6.2.1 of British Standard (BS) BS42020 'Biodiversity – Code of practice for planning and development 2013'. This is because the surveys were undertaken in 2021 and 2022 and are therefore more than three years old:

- Environmental Statement Vol II, Appendix 8.15a Invertebrate Survey Report (Ecological Survey and Assessment, February 2026) Surveys undertaken summer 2021 and spring 2022.
- Environmental Statement Vol II, Appendix 8.15b Aquatic Invertebrates Survey Report (Ecological Survey and Assessment, February 2026) Surveys undertaken summer 2021 and spring 2022.
- Environmental Statement Vol II, Appendix 8.11 Wintering and Breeding Bird Assessment (Hankinson Duckett Associates, February 2026) Surveys undertaken between November 2021 and June 2022.

As a result, we recommend that the applicant's ecologist provides an ecological addendum for bats, invertebrates, aquatic invertebrates and wintering and breeding birds or updated survey reports to support this application, which should require an additional site visit and may require updated desk study information. The ecologist will be required to provide appropriate justification, on:

- The validity of the initial report;
- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey.

If additional impacts to protected species are identified as a result of the additional ecological assessment, then any necessary further surveys for protected species should also be provided prior to determination. This is necessary as the Government Circular 06/2005 identifies that the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Therefore, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed application, is established before planning permission is granted.

This information on protected species 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.

See Appeal Decisions Ref: APP/P1560/W/24/3344547 at The Oaks, Clacton Road Weeley Essex CO16 9EF and APP/W3520/W/17/3174638 Pooles Farm, Thorney Green Road, Stowupland IP14 4AJ, where the appeals were dismissed as one of the main issues was the effect of the proposal on protected species. The Inspector could not be sure that there would be no adverse effect on protected species in the absence of ecological information. We also

highlight that this information is also requested by the Inspector even where ecology has not been a reason for refusal.

Furthermore, the Local Planning Authority, as a competent authority, should have regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) when reaching planning decisions and must not leave this until the licence application stage. Therefore, if a European Protected Species Mitigation Licence is required for this application, appropriate mitigation measures to support the provision of the licence must also be outlined prior to determination to allow certainty to the LPA that a licence will likely be granted.

Additional Comments

Hazel Dormouse

We note from the Environmental Statement Vol II, Appendix 8.8 2025 Dormouse Report (Hankinson Duckett Associates, February 2026) that the surveys undertaken in April, June, August, September and November 2025 on the main site concluded that Hazel Dormouse are likely absent from the site. However, as there are local records for the species and there is suitable habitat onsite, we support the recommendations in Section 5.2 of the Environmental Statement Vol II, Appendix 8.8 2025 Dormouse Report (Hankinson Duckett Associates, February 2026), which need to be secured by a condition of any consent and implemented in full.

We support the non-licensed Precautionary Method Statement for Hazel Dormouse in Section 8.4.2 of the Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal – Christs Hospital (Hankinson Duckett Associates, January 2026) for the Christs Hospital site. This needs to be secured by a condition of any consent and implemented in full.

Reptiles

We note from the Environmental Statement Vol II, Appendix 8.12 2025 Reptile Survey Report (Hankinson Duckett Associates, February 2026) that the seven surveys for reptiles undertaken in September 2025 concluded that the site supports very low numbers of Common Lizard and Grass Snake. Therefore, we support the Precautionary Method Statement for reptiles in the Environmental Statement Vol II, Appendix 8.12 2025 Reptile Survey Report (Hankinson Duckett Associates, February 2026) which needs to be secured by a condition of any consent and implemented in full.

Otter and Water Vole

We understand from the Environmental Statement Vol II, Appendix 8.9 2025 Water Vole and Otter Report (Hankinson Duckett Associates, February 2026) that surveys undertaken in June and October 2025 concluded that neither of these species are present on site. Therefore, we agree that no further surveys for Otter or Water Vole are required.

We support the grassland management measures in the Environmental Statement Vol II, Appendix 8.6 Botanical Survey Report (Hankinson Duckett Associates, February 2026) for the Christs Hospital site and the main site.

We also support the recommendation in the Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal – Christs Hospital (Hankinson Duckett Associates, January 2026)

for the implementation of a 15m buffer between the areas of adjacent ancient woodland (irreplaceable habitat) and the development on the Christs Hospital site.

We also support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for the Christs Hospital site (Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal – Christs Hospital (Hankinson Duckett Associates, January 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 the Christs Hospital site for protected, Priority and threatened species, which have been recommended in the Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal – Christs Hospital (Hankinson Duckett Associates, January 2026)) 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.

We also recommend that reasonable biodiversity enhancements for protected, Priority and threatened species should be identified by a suitably qualified ecologist for the main site and implemented 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 need to be outlined within a separate Biodiversity Enhancement Strategy and 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 do not hesitate to contact us if you have any queries in relation to this advice.

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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.