



Date: 23 April 2026

Our ref: 15784

Kate Turner
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

By email only:

Thank you for requesting advice on this discharge of condition 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/26/0355

Location: Land To The Rear of The Copse Worthing Road Horsham West Sussex RH13 9AT

Proposal: Construction of up to 23 residential dwellings, (including 9 affordable homes), including access, parking, landscaping and other associated infrastructure works.

Thank you for consulting Place Services on the above application.

No ecological objection	☐
No ecological objection subject to attached conditions	☐
Further information required/Temporary holding objection: • European Protected Species (bats)	☒
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 Ecological Impact Assessment Revision 01 (Lizard Landscape Design and Ecology, December 2025), relating to the likely impacts of development on designated sites, protected & Priority species and habitats, and identification of appropriate mitigation measures. Please note that comments on mandatory biodiversity net gain are provided by Horsham District Council in-house.

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 provided prior to determination. The reasons for this are outlined below:

European Protected Species

We note from Section 3.4.10 of the Ecological Impact Assessment Revision 01 (Lizard Landscape Design and Ecology, December 2025), [MAGIC maps](#) and the map on the planning portal that an existing building lies in the path of the access route, within the red line boundary at the site entrance. It appears that this building will need to be demolished, but it has not been subject to a Preliminary Roost Assessment. [Government Standing Advice](#) advises that 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*

Therefore, we recommend that a Preliminary Roost Assessment for bats is undertaken in accordance with 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023). This is required prior to determination in order to inform any mitigation requirements or the need for further surveys. This type of assessment can be undertaken at any time of the year by a qualified ecologist.

We understand from Section 4.4.2 of the Ecological Impact Assessment Revision 01 (Lizard Landscape Design and Ecology, December 2025) that tree T83 has Potential Roost Features for multiple bats (PRF-M). We therefore request confirmation that this tree will be retained within the development when the plans have been finalised.

The survey information for bats 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 Revision 01 (Lizard Landscape Design and Ecology, December 2025) that some trees are proposed for removal as the trees are suffering from Ash die back. As the trees will be removed due to safety concerns and not for the development, no further surveys for bats are required for these trees. However, we recommend that due diligence with regard to roosting bats is exercised during removal.

We support the non-licensed Precautionary Method Statement for Hazel Dormouse in Section 4.7.2 of the Ecological Impact Assessment Revision 01 (Lizard Landscape Design and Ecology, December 2025), which should be secured by a condition of any consent and implemented in full.

We also support the Precautionary Method Statement for mobile protected and Priority species (including Hedgehog, which is a Priority and threatened species) in Section 4.5.2 of the Ecological Impact Assessment Revision 01 (Lizard Landscape Design and Ecology, December 2025), which should be secured by a condition of any consent and implemented in full.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Ecological Impact Assessment Revision 01 (Lizard Landscape Design and Ecology, December 2025) 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.

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 support a lawful decision and 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.