Place Services
Essex County Council
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Date: 23 November 2026 Our ref: 24630

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By email only: Planning Department, planning@horsham.gov.uk

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.

Application: **DC/26/0530**
Location: **Land at Hornbrook Farm Brighton Road West Sussex**
Proposal: **Outline planning application for up to 160 dwellings, open space and associated works and infrastructure with all matters reserved apart from access (revised 10.11.2026)**

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

No ecological objection	☐
No ecological objection subject to attached conditions	☒
Further information required/Temporary holding objection	☐
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 supplied by the applicant, relating to the likely impacts of development on protected & Priority species and habitats, and identification of appropriate mitigation:

- Ecological Impact Assessment Revision 1 (Urban Edge Environmental Consulting, October 2026)

- Ecological Impact Assessment (Urban Edge Environmental Consulting, February 2026)
- Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting, February 2026)
- Great Crested Newt & Otter / Water Vole Survey Report Revision 1 (Urban Edge Environmental Consulting, February 2026)
- Protected Species Report (Urban Edge Environmental Consulting, February 2026)
- Technical Note Ecological Walkover Survey 3rd Issue (Urban Edge Environmental Consulting, February 2026)

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

We note from the Ecological Impact Assessment Revision 1 (Urban Edge Environmental Consulting, October 2026) that there are no buildings on site and the six trees identified with Potential Roost Features for multiple bats (PRFs-M) will be retained. We highlight that for any trees with PRFs for individual bats which will be removed, 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 for bats 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 Bat Conservation Trust (Collins ed., 2023).

We also support the implementation of the 10m buffer zone to protect Horn Brook in Section 5.2.3 of the Ecological Impact Assessment Revision 1 (Urban Edge Environmental Consulting, October 2026) and the implementation of pre-commencement checks for Otter (European Protected Species) and Water Vole (protected species) in the vicinity of the waterbody. We highlight that if evidence is found of either of these species, then further assessment will be required. This should be secured by a condition of any consent and implemented in full. We also note that the Ecological Impact Assessment Revision 1 (Urban Edge Environmental Consulting, October 2026) concludes that Horn Brook has negligible importance for fish.

We note that an on-site receptor site for Common Lizard and other reptiles will be created in the southeast of the site and we support the outline translocation methodology in Table 6.2 Section 6.3 of the Ecological Impact Assessment Revision 1 (Urban Edge Environmental Consulting, October 2026). This should be secured by a condition of any consent and implemented in full.

We also support Recommendation R18 in Table 5.3 Section 5.4 of the Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting, February 2026) to enable continued use of the site by Harvest Mouse through the retention of hedgerows, the creation of new hedgerows and the provision of tall grass within green spaces. This should be secured by a condition of any consent and implemented in full.

We also support the implementation of the Precautionary Method Statement for mobile protected and Priority species (including Hedgehog, which is a Priority and threatened species) (R19 in Table 5.3 Section 5.4 of the of the Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting, February 2026)). This should be secured by a condition of any consent and implemented in full.

We are still satisfied that there is sufficient ecological information available to support determination of this application. However, please note 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.

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 Ecological Impact Assessment Revision 1 (Urban Edge Environmental Consulting, October 2026), Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting, February 2026), Great Crested Newt & Otter / Water Vole Survey Report Revision 1 (Urban Edge Environmental Consulting, February 2026), Protected Species Report (Urban Edge Environmental Consulting, February 2026) and Technical Note Ecological Walkover Survey 3rd Issue (Urban Edge Environmental Consulting, February 2026) 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, including bats, Otter, Water Vole, 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 (Ecological Impact Assessment Revision 1 (Urban Edge Environmental Consulting, October 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 Table 5.4 Section 5.5 of the Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting, February 2026) to secure net gains for biodiversity, as outlined under the National Planning Policy Framework (August 2026) N2 Part F. Reasonable biodiversity measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Measures Strategy to be secured as 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 Ecological Impact Assessment Revision 1 (Urban Edge Environmental Consulting, October 2026)), Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting, February 2026), Great Crested Newt & Otter / Water Vole Survey Report Revision 1 (Urban Edge Environmental

Consulting, February 2026), Protected Species Report (Urban Edge Environmental Consulting, February 2026) and Technical Note Ecological Walkover Survey 3rd Issue (Urban Edge Environmental Consulting, February 2026), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. This includes the Precautionary Method Statement for mobile protected species in R19 in Table 5.3 Section 5.4 of the of the Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting, February 2026)), which avoids impacts on protected species.

This will 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. CONCURRENT WITH RESERVED MATTERS 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).

3. CONCURRENT WITH RESERVED MATTERS PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY MEASURES STRATEGY

"Prior to any works above slab level, a Biodiversity Measures Strategy for protected and Priority or threatened species, prepared by a suitably qualified ecologist in line with the recommendations of the prepared by a suitably qualified ecologist in line with the recommendations in Table 5.4 Section 5.5 of the Preliminary Ecological Appraisal Report (Urban Edge Environmental Consulting, February 2026), shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Measures Strategy shall include the following:

a) Purpose and conservation objectives for the proposed measures or features;
b) detailed designs or product descriptions to achieve stated objectives;
c) locations of proposed measures or features by appropriate maps and plans (where relevant);
d) persons responsible for implementing the measures or features; 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 National Planning Policy Framework (August 2026) N2 Part F and s40 of the NERC Act 2006 (as amended).

3. CONCURRENT WITH RESERVED MATTERS PRIOR TO OCCUPATION: 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 (through provision of lighting layout plans, isolux contour plans, luminaire specifications, mounting heights, aiming angles, shielding measures, and lighting control strategies) 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).

6. CONCURRENT WITH RESERVED MATTERS: TIME LIMIT ON DEVELOPMENT BEFORE FURTHER SURVEYS ARE REQUIRED

"If the development hereby approved does not commence within one year from the date of the planning consent, the approved ecological mitigation measures secured through condition shall be reviewed and, where necessary, amended and updated.

The review shall be informed by further ecological surveys commissioned to:

i. establish if there have been any changes in the presence and/or abundance of bats, Otter, Water Vole, reptiles and mobile protected and Priority species and;

ii. identify any likely new ecological impacts that might arise from any changes.

Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and approved in writing by the local planning authority prior to the commencement of the development.

Works will then be carried out in accordance with the proposed new approved ecological measures and timetable."

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.

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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.

AI may have been used in the preparation of this response, but its use will be limited to basic proof-reading, grammar, and spelling correction. This response has been reviewed by the author(s). If you have any queries, please contact us for information about our AI guidance.