Place Services
Essex County Council
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Date: 18 November 2026
Our ref: 24770

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By email only: planning@horsham.gov.uk

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.

Application: DC/26/0266
Location: Thakeham Mushrooms Storrington Road Thakeham Pulborough
Proposal: "Demolition of existing buildings and the redevelopment of the site to provide 150 dwellings, including affordable housing, land for the community land trust, works to public right of way and associated landscaping, open space and infrastructure."

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

No ecological objection	☐
No ecological objection subject to attached conditions	☒
Further information required/Temporary holding objection	☐
Recommend refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐

Summary

We have reviewed the documents supplied by the applicant relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

Our comments from 26th March 2026 are largely unchanged and have been included for posterity. However, we received updated information from the case officer (26th October 2026) about the potential presence of Black Redstart and Linnet present on site. Regarding the Linnet, the site has suitable habitat for use by nesting Linnets. The information provided for this species is sufficient and conditions such as a CEMP: Biodiversity and landscaping conditions would be sufficient, and no further comment was required at the time. We requested further information be provided regarding the provision of an outline mitigation and compensation strategy for Black Redstart, due to the photos showing both male and female birds, recorded in summer and winter. Black Redstart is a Schedule 1, Priority species. We have provided further comments on this matter below.

We are now satisfied that there is sufficient ecological information available to support determination of this application.

European Protected Species: Bats

We note from the Ecological Appraisal (Aspect Ecology Ltd., January 2026) that a licence for bats will be required before commencement of any works and recommend that a copy of this is secured by a condition of any consent. Emergence and dawn re-entry surveys for bats were undertaken in 2023 and update inspections undertaken in 2025 as follows:

- Single surveys in August 2023 on Buildings B5 (industrial building), B6 (industrial building), B7a, b and c (industrial buildings), B10 (industrial building) and B11(also labelled B11a) (industrial building).
- Two surveys in July and August 2023 on building B8 (disused office building).

These surveys confirmed the presence of summer day roosts for Soprano Pipistrelle, an unidentified bat and Common Pipistrelle in building B8 and a summer day roost for a Soprano Pipistrelle in building B11a. We support the outline mitigation measures in Sections 6.1.10 to 6.1.12 of the Ecological Appraisal (Aspect Ecology Ltd., January 2026). We highlight that, if the applicant intends to use a registered bat consultant under a Bat Mitigation Class Licence, post consent evidence of the site registration under a Bat Mitigation Class Licence for Bats will need to be submitted to the LPA.

We note from the Ecological Appraisal (Aspect Ecology Ltd., January 2026) that the following buildings have negligible bat roost potential: B1 (steel framed construction), B2 (steel framed construction), B3 (steel framed construction), B4 (brick built substation), B5a (breeze block construction), B5b (metal agricultural building), B9 (brick construction), B12 (steel framed construction), B13 (steel framed construction), B14 (corrugated asbestos

outbuilding), B051 (metal electrical structure), B052 (sealed metal storage cylinder), B053 (steel container), B054 (sealed steel cylinder), B055 (timber framed construction). In addition, we understand from the Ecological Appraisal (Aspect Ecology Ltd., January 2026) that all trees on site will be retained.

We also note from the Ecological Appraisal (Aspect Ecology Ltd., January 2026) that Common and Soprano Pipistrelle frequently forage and commute in the woodland, trees and scrub on site and there were occasional passes from Barbastelle, a rare species. We understand the majority of these habitats will be retained and there will be additional tree, hedgerow and shrub planting.

We have considered the likely impacts on European Protected Species and applied the Favourable Conservation Status licensing test to demonstrate that the LPA, as a competent authority, has had regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) as this must not be left until the licence application stage when reaching planning decisions.

Designated Sites: The Mens SAC

The site lies approximately 9.0km southeast of The Mens Special Area of Conservation (SAC) (MAGIC maps) and therefore lies within the 12km Wider Conservation Area for this SAC, for which significant impacts or severance to flightlines must be considered (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The qualifying feature for the SACs is Barbastelle bat and there are five records for this species within 2km, with the nearest located 1.8km northeast (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). Two European Protected Species Mitigation Licences (EPSML) has been granted within 2km of the site as follows: a) for Brown Long-eared bat and Common Pipistrelle bat approximately 1.8km to the east in 2016; and b) for Brown Long-eared bat bat approximately 1.8km to the east in 2017; (MAGIC maps). There are approximately 85 records of bats within 2km of the site, including Common Pipistrelle, Serotine and Brown Long-eared bat (SBISx – accessed under licence.

The site lies approximately 14.7km southeast of Ebernoe Common SAC and therefore lies outside the 12km Wider Conservation Area for this SAC. The site lies approximately 4.2km east of Arun Valley SAC, SPA and Ramsar site.

We understand from the submitted documents that the site comprises buildings, other structures and hardstanding, amenity grassland, species-poor grassland, other neutral grassland, open mosaic habitat, broadleaved woodland, bramble and scattered scrub, scattered trees, hedgerows and a tree line to the south of the site. We also understand that all woodland and the six hedgerows will be retained, apart from small sections of hedgerows H1(comprised of Hazel, Hawthorn, Dogwood, Blackthorn, Field Maple, Ash, Holly, English Elm and Wild Privet) and H2 (comprised of Wilson's Honeysuckle) on the

eastern boundary which will be removed to facilitate access. New native species-rich hedgerows will be planted in compensation around the green space areas and the built development and gaps in existing hedgerows will be planted up with native species.

Therefore, there will be no severance to the flight lines of foraging or commuting bats from the SAC and habitat connectivity within the site will be maintained.

It is recommended in the Ecological Appraisal (Aspect Ecology Ltd., January 2026) that a sensitive lighting scheme is implemented for this application to mitigate against the increase in light measures following Bat Conservation Trust advice and The Institution of Lighting Professionals.

As there is a potential for habitat fragmentation from light spill of potentially functionally linked land for Barbastelle bats, this has been screened in and will need to be considered at Stage 2 Appropriate Assessment of the LPA's project level Habitats Regulations Assessment (HRA).

As Barbastelle bats may use the onsite habitat, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Ecological Appraisal (Aspect Ecology Ltd., 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 therefore believe that, with mitigation, there will be no Adverse Effect on Integrity of the SAC. We advise the LPA to prepare a project level HRA Appropriate Assessment to record its decision and consult Natural England on the conclusion. The HRA Appropriate Assessment to record produced in March 2026 does not require updating and if Natural England have already been consulted, will not require additional consultation.

European Protected Species: Hazel Dormouse

We also note from the Ecological Appraisal (Aspect Ecology Ltd., January 2026) that surveys during July through to November 2023 confirmed the presence of Hazel Dormouse onsite. As short sections of hedgerows H1 and H2 will be removed, we support the outline measures in Sections 6.1.23 and 6.1.24 of the Ecological Appraisal (Aspect Ecology Ltd., January 2026) to support an application for a European Protected Species Mitigation Licence.

Schedule 1 Bird Species/ Priority Species: Black Redstart

We have reviewed the Ecological Method Statement for Black Redstart (Aspect Ecology, November 2026) and we are satisfied that the mitigation measures proposed within the document, which include sensitive timings of works, implementation of buffers where needed and ecological supervision are sufficient. Additionally, we are satisfied that the justification regarding the lack of compensation provisions is reasonable. The Ecological Method Statement for Black Redstart (Aspect Ecology, November 2026) should be secured by a condition of any consent and implemented in full.

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 Appraisal (Aspect Ecology Ltd., January 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, which includes bats, Hazel Dormouse 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 also support the implementation of the Precautionary Method Statement for mobile protected and Priority species (including Hedgehog, which is a Priority and threatened species) in Sections 6.1.17, 6.1.18 of the Ecological Appraisal (Aspect Ecology Ltd., January 2026)). This should be secured by a condition of any consent and implemented in full.

We are satisfied that there is sufficient ecological information available for determination of this application. We have no objections on ecological matters excluding Great Crested

Newt as we have been instructed to leave comments on this European Protected Species to the NatureSpace Partnership.

We also support the proposed reasonable biodiversity measures for protected, Priority and threatened species, as outlined in National Policy N2 1(f) of the National Planning Policy Framework (August 2026). 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 Appraisal (Aspect Ecology Ltd., January 2026) and the Ecological Method Statement for Black Redstart (Aspect Ecology, November 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 and Priority species in Sections 6.1.17 and 6.1.18 of the Ecological Appraisal (Aspect Ecology Ltd., January 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. **PRIOR TO COMMENCEMENT OF ANY WORKS WHICH WILL IMPACT THE BREEDING / RESTING PLACE OF BATS: SUBMISSION OF A COPY OF EPS**

MITGATION LICENCE OR EVIDENCE OF SITE REGISTRATION UNDER A BAT MITIGATION OR EARNED RECOGNITION CLASS LICENCE FOR BATS

"Any works which will impact the resting place of bats, shall not in in any circumstances commence *unless the local planning authority has been provided with either:*

a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or

b) evidence of site registration supplied by an individual registered to use a Bat Mitigation or Earned Recognition Class Licence; or

c) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence."

Reason: To conserve protected 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 s17 Crime & Disorder Act 1998.

3. PRIOR TO COMMENCEMENT OF ANY WORKS WHICH WILL IMPACT THE BREEDING / RESTING PLACE OF HAZEL DORMOUSE: SUBMISSION OF A COPY OF EPS MITGATION LICENCE

"Any works which will impact the breeding / resting place of Hazel Dormouse, shall not in in any circumstances commence *unless the local planning authority has been provided with either:*

a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or

b) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence."

Reason: To conserve protected 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 s17 Crime & Disorder Act 1998.

4. 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).

5. PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY MEASURES STRATEGY

"Prior to any works above slab level, a Biodiversity Measures Strategy for protected, Priority and threatened species, prepared by a suitably qualified ecologist in line with the recommendations of the Ecological Appraisal (Aspect Ecology Ltd., January 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 support protected, Priority and threatened species and allow the LPA to discharge its duties under National Policy N2 1(f) of NPPF August 2026 and s40 of the NERC Act 2006 (as amended).

6. 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 Hazel Dormouse 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 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).

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.

Place Services have a policy relating to the use of AI. Unless otherwise stipulated, any AI 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.