



Date: 21 July 2026

Our ref:19576

Hannah Darley
Horsham District Council
Parkside
Horsham
West Sussex
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By email only: Planning Department, 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/26/0506
Location: Land at Grid Reference 510699 117812 To The South of Dukes Copse Community Bramble Lane Thakeham West Sussex
Proposal: Change of Use of land to Gypsy/Traveller site comprising 2 pitches with the siting of a mobile home and dayroom per pitch.

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

No ecological objection	☐
No ecological objection subject to attached conditions	☐
Further information required/Temporary holding objection: • European Protected Species (bats) • Protected species (reptiles)	☒
Recommend Refusal	☐
Subject to Natural England's formal 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 documents supplied by the applicant, relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation. Unfortunately, no information has been submitted in relation to ecology, other than that for Biodiversity Net Gain. Please note that comments on 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 further information relating to bats and reptiles is required to make this proposal acceptable prior to determination. The reason for this is outlined below:

European Protected Species: bats

It appears from the As Existing Site Plan Drawing No. J005516-DD-03 (WS Planning & Architecture Ltd., February 2026) and the As Proposed Site Plan Drawing No. J005516-DD-13 Rev A (WS Planning & Architecture Ltd., February 2026) that there are eight structures on site which will be removed. As this may impact roosting bats, a Preliminary Roost Assessment is required and the results submitted to the LPA prior to determination.

In addition, it also appears from the As Existing Site Plan Drawing No. J005516-DD-03 (WS Planning & Architecture Ltd., February 2026) and the As Proposed Site Plan Drawing No. J005516-DD-13 Rev A (WS Planning & Architecture Ltd., February 2026) that two trees may be removed from the western area of the site. Therefore, a Ground Level Tree Assessment needs to be undertaken to assess any likely impact to roosting bats in accordance with the 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023).

[Government Standing Advice](#) for bats says you should ask for a survey if:

- *the development site includes or is close to [any built structures](#), on or underground, that provide commuting, foraging or roosting opportunities for bats*
- *the development site includes or is close to [trees](#).*

We highlight that these assessments can be undertaken at any time of the year.

Protected Species: reptiles

We also recommend that a Preliminary Ecological Appraisal should be undertaken in order to assess any impacts to reptiles and other mobile protected and Priority species, including common amphibians and Hedgehog (which is a Priority and threatened species). The As Existing Site Plan Drawing No. J005516-DD-03 (WS Planning & Architecture Ltd., February 2026) shows a rubble and debris pile near the western boundary which may provide suitable habitat for reptiles and the hedgerows can also provide shelter for reptiles and other mobile protected and Priority species. This is in accordance with [Government Standing Advice for reptiles](#), which says you should ask for a survey if:

- *the development proposal is likely to lead to harm to individual reptiles or their habitats*

- *suitable habitat is present at the development site that could support reptiles*

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, reptiles and mobile protected and Priority species.

The information 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.

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 including the Favourable Conservation Status licensing test 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.

This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).

We also highlight that the Location Plan Drawing No. J005516-DD-01 Rev A (WS Planning & Architecture Ltd., February 2026) indicates a long track to the site as part of the red line boundary. The map on the website shows only the site itself as being enclosed by the red line boundary.

Additional comments

We welcome the retention of the native hedgerows around the site.

If external lighting is required, we also recommend that a Wildlife Friendly Lighting Strategy is implemented for this application 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 recommend that reasonable biodiversity enhancements for protected, Priority and threatened species should be identified 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 should be outlined within a separate Biodiversity Enhancement Layout and should be secured by a condition of any consent.

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](#).

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.

Hayley Dean MCIEEM MSc BSc (Hons)
Senior Ecological Consultant

Place Services at Essex County Council



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.