



Date: 2 July 2026
Our ref: 19064

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By email only: 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/25/2087
Location: Thakeham Tiles Ltd Rock Road Storrington West Sussex
Proposal: Outline application for the demolition of existing buildings, and the re-development of the site for up to 108no. dwellings (including a mix of private and affordable housing units), with associated infrastructure including vehicular, cycle and pedestrian access, parking, landscaping, open space and play provision, and sustainable drainage with all matters reserved except access.

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

No ecological objection	☐
Recommend approval subject to attached conditions	☐
Further information required/Temporary holding objection on: • European Protected Species (bats)	☒
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 previously reviewed the Ecological Impact Assessment (The Ecology Co-op, November 2025) 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 mandatory biodiversity net gain are provided by Horsham District Council in-house.

We have now also reviewed the Ground Level Tree Assessment (GLTA) (The Ecology Co-Op, May 2026), Arboricultural Implications Assessment (CBA, May 2026) and the Illustrative Landscape Masterplan Rev 4 (Lizard, September 2025).

We are still 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. The reasons for this are outlined below:

European Protected Species: bats

We previously stated that we understand from Section 3.4.1 of the Ecological Impact Assessment (The Ecology Co-op, November 2025) that sections of woodland on the western boundary will be removed and therefore we agree that Ground Level Tree Assessment for impacts to roosting bats are required. The applicant has now undertaken a Ground Level Tree Assessment (GLTA) (The Ecology Co-Op, May 2026) with Oak Tree 1 assessed as PRF-M (This is T79 in the Arboricultural Report) and Oak Tree 4 assessed as FAR, with further assessment required due to Ivy presence (T48 within the Arboricultural Report).

Regarding Oak Tree 1, the Ground Level Tree Assessment (GLTA) (The Ecology Co-Op, May 2026) states this will be retained and protected, however, this does not correlate with the Illustrative Landscape Masterplan Rev 4 (Lizard, September 2025) and additionally, the Arboricultural Implications Assessment (CBA, May 2026) advises the removal of this tree. As this tree was assessed as PRF-M as per Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition), this tree should be subject to further surveys to inform mitigation and compensation measures. Additionally, if it can be suitably demonstrated that Tree 1 is to be retained, the applicant's ecologist should assess the impacts upon this roost resource from having surrounding trees removed and leaving it exposed to the elements.

Regarding Tree 4, the Ground Level Tree Assessment (GLTA) (The Ecology Co-Op, May 2026) recommends precautionary measures overseen by a suitably licenced ecologist, however, until the level of bat roost potential is known, this advice is not appropriate. The

Arboricultural Report advises there the deadwood is to be removed and the Ivy is to be severed. Unless it can be demonstrated that this tree will be retained and unimpacted, further assessment is required to ascertain the level of bat roost potential and if further surveys are required to inform mitigation measures. If the tree is found to be PRF-I, precautionary measures as described, would be appropriate, alongside, suitable compensation measures which would need to be in place prior to the loss of any roost resource in accordance with UK Bat Mitigation Guidelines v1.2 CIEEM (Reason and Wray, August 2025).

This is in accordance with [Government Standing Advice](#) which says that you should ask for a bat survey if:

- the development site includes or is close to [trees](#), shrubs, rock formations, quarries, natural cliff faces or water bodies that provide commuting, foraging or roosting opportunities for bats
- the development proposal includes lighting of buildings or green spaces close to habitats that bats tend to use.

As the site lies approximately 10.3km southeast of The Mens Special Area of Conservation (SAC) ([MAGIC maps](#)), it is within the 12.0km Wider Conservation Area for this SAC. Within this area 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 (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). There are four records for this species within 2 kilometres, with the nearest approximately 330m north, from 2015 (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). Four European Protected Species Mitigation Licence (EPSML) have been granted within 2km of the site as follows: (a) Common Pipistrelle; Whiskered; Brown Long-eared; Barbastelle, Brandts 2015, 1.7km, south, (b) Whiskered, Daubentons and Natterers, 2013, 1km southeast, (c) Soprano Pipistrelle, 2015, 135m southwest and (d) Brown Long-eared, 2017, 1.6km northeast. There are approximately 109 records of bats within 2km of the site (SBISx – accessed under licence).

Further detail is also required regarding the loss of potential roost resources, foraging and commuting habitat used by Barbastelle bats, which are the qualifying feature of the SAC. This information is required to inform the LPAs Project Level 2 HRA.

The bat activity survey results indicate that at least seven species of bat are foraging and commuting on the site, particularly in the northeastern woodland (Section 3.4.5 of the Ecological Impact Assessment (The Ecology Co-op, November 2025)). These include the rare Barbastelle bat, Common Pipistrelle, Soprano Pipistrelle, long-eared bat species, *Myotis* species, Serotine and *Nyctalus* species.

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.”*

The results of these surveys are 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).

Additional Comments

We note from the Ecological Impact Assessment (The Ecology Co-op, November 2025) that the following buildings have low bat roost potential: Storage warehouse, Main office, Factory and Manufacturing warehouse. However, single bat emergence surveys undertaken on these buildings in August 2024 observed no emerging bats. We also note that the following buildings have negligible bat roost potential: Weighbridge office (no potential), Toilet block, Garage, Workshop, Canteen, Air compressor building and Storage facility. Therefore, we agree that no further surveys are required for the buildings onsite. We would like to highlight due to the age of the emergence surveys, should there be a significant delay in this application, it may be necessary to undertake update emergence surveys to ensure the results are consistent.

Due to the age of the ecological data, it may be necessary to provide an ecological addendum, to verify the results of the single emergence survey are still valid in line with CIEEM Advice Note on the Lifespan of Ecological reports and surveys (2019).

We also note from the Ecological Impact Assessment (The Ecology Co-op, November 2025) that the Hazel Dormouse survey concludes that this species is likely absent on the site and we therefore agree that no further surveys are required.

We also support the Precautionary Method Statement for reptiles and mobile protected and Priority species (including Hedgehog, which is a threatened and Priority species) in Section 5.3.2 of the Ecological Impact Assessment (The Ecology Co-op, November 2025). This needs to be secured by a condition of any consent and implemented in full.

We support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Ecological Impact Assessment (The Ecology Co-op, November 2025)) 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 the Ecological Impact Assessment (The Ecology Co-op, November 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 recommend that the NatureSpace Partnership is consulted on this application.

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.