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Our ref: 16946
Date: 8 May 2026

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/25/2057
Location: Land North of Little Slaughterford Chapel Road Barns Green West Sussex
Proposal: "Proposed development of 68 dwellings with vehicular and pedestrian accesses, public open space, hard and soft landscaping and associated works including supporting foul and surface water drainage works, and works to existing culverted watercourse on site."

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	☒

Please refer to Horsham District Council's advice regarding Water Neutrality requirements following [Natural England's Withdrawal Statement \(31st October 2025\)](#).

Summary

Our comments are largely unchanged; we are still satisfied with the ecological information provided and the reasons for this are detailed below. Our comments regarding Ancient Woodland buffer and hedgerow planting have been updated following revisions to the BNG Technical Note (Ecology Partnership, April 2026) and the Landscape Strategy (Deacon Design, Revision F, September 2025).

We have reviewed the Ecological Impact Assessment (The Ecology Partnership, November 2025), Bat Activity Survey Report (The Ecology Partnership, November 2025), Dormouse Survey Report (The Ecology Partnership, September 2025) and Preliminary Ecological Appraisal (The Ecology Partnership, June 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 note from the Ecological Impact Assessment (The Ecology Partnership, November 2025) that there are no buildings onsite and that all of the trees to be impacted by the proposals have negligible bat roost potential. We therefore agree that no further surveys for bats are required.

The site lies approximately 8.6km northeast of The Mens Special Area of Conservation (SAC) and therefore lies within the 12.0km Wider Conservation Area for this SACs. Within this area, significant impacts or severance to flightlines must be considered as this is the full extent of the range of foraging area required by Barbastelle bat, the qualifying feature of the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). Barbastelle bat was recorded 48 times onsite throughout April, July, August and September (Bat Activity Survey Report (The Ecology Partnership, November 2025)).

Two European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site: a) 3.14km to the southwest for Brown Long-eared bat and Common Pipistrelle bat in 2015 and b) 1.0km to the northeast for Brown Long-eared bat and Common Pipistrelle bat in 2015 ([MAGIC maps](#)). There are approximately 94 records of bats within 2km of the site, including one record for Barbastelle and multiple records for Serotine, Brandts, Daubenton's, Whiskered and Natterer's Bat (SBISx – accessed under licence), as well as multiple records for common species.

The site lies 13.8km east of Ebernoe Common Special Area of Conservation (SAC) and approximately 11.3km northeast of Arun Valley SAC, SPA and Ramsar site.

We understand from the submitted documents that the 3.2ha site comprises modified grassland bordered by hedgerows with adjacent ancient woodland on the western

boundary. There is a large fishing pond offsite to the west, which is also surrounded on the southern western and eastern boundaries by ancient woodland ([MAGIC maps](#)). We understand the onsite eastern hedgerow is to be removed for access, but a new native species hedgerow will be established on this boundary. Other boundary habitats are to be retained. In addition, ~32 native trees will be planted outside the residential areas and ~38 street trees will be planted outside private gardens. This is a reduction from what was previously proposed. Mixed native shrub will be planted on the southern and northern boundaries (Biodiversity Net Gain Feasibility Assessment & Outline Habitat Management and Monitoring Plan (The Ecology Partnership, September 2025)). We are still satisfied the important commuting corridors are being retained and or reinstated, as is demonstrated within the Landscape Strategy (Deacon Design, Revision F, September 2025).

Therefore, there will be no overall 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 Impact Assessment (The Ecology Partnership, November 2025), Ecological Impact Assessment (Ecology Works, March 2025) 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 bat may use the onsite habitat, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Ecological Impact Assessment (The Ecology Partnership, 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 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.

We understand from the Ecological Impact Assessment (The Ecology Partnership, November 2025) that the Hazel Dormouse survey undertaken between May and September 2025 did not record the presence of this species. We therefore agree that no further surveys are required for Hazel Dormouse.

There is suitable habitat onsite to support reptiles and mobile protected and Priority species (including Hedgehog, which is a Priority and threatened species). Therefore, we support the Precautionary Method Statement for reptiles in Section 4.44 of the Preliminary Ecological Appraisal (The Ecology Partnership, June 2025) and for mobile protected and Priority species in Sections 4.47 and 5.20 of the Ecological Impact Assessment (The Ecology Partnership, November 2025). This should be secured by a condition of any consent and implemented in full.

As there is adjacent ancient woodland (irreplaceable habitat) on the western boundary, we support the implementation of a vegetated buffer between the ancient woodland and the grassland. The BNG Technical Note (Ecology Partnership, April 2026) indicates this will now be a varied buffer between 15 and 20 m, which is still considered an appropriate buffer distance. This should be secured by a condition of any consent and implemented in full.

We are satisfied that there is sufficient ecological information available to support determination of this application. However, 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](#).

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 (The Ecology Partnership, November 2025), Bat Activity Survey Report (The Ecology Partnership, November 2025), Dormouse Survey Report (The Ecology Partnership, September 2025) and Preliminary Ecological Appraisal (The Ecology Partnership, June 2025), which 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, 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 also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Ecological Impact Assessment (The Ecology Partnership, 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 Strategy and should be secured by 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 (The Ecology Partnership, November 2025), Bat Activity Survey Report (The Ecology Partnership, November 2025), Dormouse Survey Report (The Ecology Partnership, September 2025) and Preliminary Ecological Appraisal (The Ecology Partnership, June 2025) 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 reptiles in Section 4.44 of the Preliminary Ecological Appraisal (The

Ecology Partnership, June 2025) and for mobile protected and Priority species in Sections 4.47 and 5.20 of the Ecological Impact Assessment (The Ecology Partnership, November 2025). This 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: 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. **PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY**

“Prior to any works above slab level, a Biodiversity Enhancement Strategy for protected, Priority and threatened species, prepared by a suitably qualified ecologist, shall be submitted to and approved in writing by the local planning authority.

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

- a) Purpose and conservation objectives for the proposed enhancement measures;*
- b) detailed designs or product descriptions to achieve stated objectives;*
- c) locations of proposed enhancement measures by appropriate maps and plans (where relevant);*
- d) persons responsible for implementing the enhancement measures; 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, Priority and threatened species and allow the LPA to discharge its duties under paragraph 187d of NPPF 2024 and s40 of the NERC Act 2006 (as amended).

4. **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 appropriate lighting plans and technical specifications) 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 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.