



Date: 01 July 2026

Our ref: 19071

Matthew Porter
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

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/26/0366
Location: Land North West of Southwater RH13 9AW
Proposal: Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure.

Thank you for 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: • European Protected Species (bats)	☒
Recommend Refusal	☐

Subject to Natural England's comments on the conclusion of the LPA's Appropriate Assessment	☒
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[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 relating to the likely impacts of development on designated sites, protected and Priority species and habitats and the identification of proportionate mitigation:

Main site and Christs Hospital site

- Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026)
- Technical Note Appendix C 2026 Wintering and Breeding Bird Survey Report (Hankinson Duckett Associates, May 2026)
- Technical Note Annex D Brown Hairstreak Survey Report (Hankinson Duckett Associates, May 2026)
- Environmental Statement Volume II, Appendix 8.2 UK Habitat Classification Survey and Target Notes – Main Site (Hankinson Duckett Associates, February 2026)
- Environmental Statement Vol II, Appendix 8.12 2025 Reptile Survey Report (Hankinson Duckett Associates, February 2026) Surveys undertaken September 2025.
- Environmental Statement Vol II, Appendix 8.9 2025 Water Vole and Otter Report (Hankinson Duckett Associates, February 2026) Surveys undertaken June and October 2025).
- Environmental Statement Vol II, Appendix 8.6 Botanical Survey Report (Hankinson Duckett Associates, February 2026) Surveys undertaken (Survey undertaken May 2019)
- Environmental Statement Vol II, Appendix 8.7 Bat Survey Report Rev A (Hankinson Duckett Associates, February 2026) Surveys undertaken June 2021 and May and July 2022.
- Environmental Statement Vol II, Appendix 8.11 Wintering and Breeding Bird Assessment (Hankinson Duckett Associates, February 2026) Surveys undertaken between November 2021 and June 2022.
- Environmental Statement Vol II, Appendix 8.15a Invertebrate Survey Report (Ecological Survey and Assessment, February 2026) Surveys undertaken summer 2021 and spring 2022.
- Environmental Statement Vol II, Appendix 8.15b Aquatic Invertebrates Survey Report (Ecological Survey and Assessment, February 2026) Surveys undertaken summer 2021 and spring 2022.

Main site only

- Environmental Statement Vol II, Appendix 8.8 2025 Dormouse Report (Hankinson Duckett Associates, February 2026) Surveys undertaken April, June, August, September and November 2025).

Christs Hospital site only

- Environmental Statement Vol II, Appendix 8.13 Christs Hospital 2025 Reptile Survey Report (Hankinson Duckett Associates, February 2026)
- Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal – Christs Hospital (Hankinson Duckett Associates, January 2026),

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

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 note from the Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026) that Building B5 (bridge under footpath) and B11 (single-storey milking room) have low bat roost potential: Therefore, if these structures are being removed, a further single emergence survey will be required in accordance with Table 7.2 of the 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023).

In addition, we note from the Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026) that the following trees have probable bat roosts: G14c Field Maple, H4a Oak and T84 Oak and W1Aj Ash. We also note that the following trees have Potential Roost Features for multiple bats (PRF-Ms) and therefore, if any of the trees with probable bat roosts or with PRFs-M, are being removed, then they need to be subject to further aerial (close) inspection or emergence surveys between May and September (Table 6.4 of the 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023), with the results of the surveys submitted to the LPA prior to determination:

T5 Ash T13 Ash T18 Oak T19 Oak T20 Oak T25 Oak T28 Oak T35 Oak T36 Oak T37 Oak T38 Oak T39 Oak T40 Oak T42 Oak T46 Oak T47 Oak T54 Oak T55 Oak T57 Oak T58 Oak T61 Oak T63 dead Ash T65 Oak T71 Oak T72 Oak T77 Oak T78 Oak T79 Oak T80 Oak T82 Ash T87 Oak T101 Ash T103 Oak T104 Oak T105 Oak T108 Oak T111 Oak T116 Oak T117 Oak W1a Dead Ash W1AA Oak W1AB Field Maple W1AC Sycamore W1AD Sycamore W1AE Hornbeam W1AF Field Maple W1ah Field Maple W1AK Sycamore W1b Sycamore W1c Field Maple W1d Sycamore W1e Sycamore W1f Field Maple W1I Sycamore W1J Sycamore W1k Sycamore W1L Sycamore W1m Field Maple W1N Sycamore W1P Sycamore W1Q Silver Birch W1R Sycamore W1T Sycamore W1V Plane W1X Willow W1Y Sycamore

W1Z Hornbeam W2b Sycamore W2C Oak W2F Sycamore W2g Corsican Pine W2h Ash W2i Ash W2j Pine W2k Oak W2L Oak W2m Hazel W2N Beech W5b Oak W6a G10a Goat Willow G11a Oak G21b Dead Oak G21c Dead Oak G26a Oak G28a Field Maple G31a Ash G31b Ash G31c Ash G32a Oak G33c Oak G35c Willow G35d Willow G35f Hazel G35g Hazel G35h Hazel G38a Ash G38b Holly G38c Field Maple x 3 G39a Oak G39b Oak G46q Ash G46b Hawthorn x5 G48a Hawthorn G48b Field Maple G48c Field Maple G59a Ash G64a Oak G64AB dead tree G64AD Oak G64AF Oak G64AG Hawthorn G64AH Field Maple G64AI Oak G64AJ Hawthorn G64AN Field Maple G64AO Ash G64AP Mixed spp G64 AR Hawthorn G64f Ash G64I Hawthorn G64J Field Maple G64K Oak G64m Oak G64n Ash G64Q Oak G64Y Field Maple G64AZ Field Maple G67a Ash G68a Ash G70c Oak G70d Oak G70e Ash x2 G70f Oak G70g Oak G70h Oak G71a Oak G76b Oak G77b Oak G81a Oak G87a Oak G87b Wild Service tree G87e Oak G92b Ash G92d Ash G92e Ash G92g Ash G94a Field Maple G94d Field Maple G95a Ash G95b Oak G96a Oak G96c Oak G99a Ash G101a Oak G101b Oak G102b Willow G103a Goat willow G105a Oak G106b Field Maple G108a Oak G108b Ash G113a Oak G114a Ash G115a Willow G117b Ash G120b Ash G120d Ash G122c Oak G122d Field Maple G124a Field Maple G130a Goat Willow G145e Whitebeam H58a Oak H67a Field Maple.

We understand that the Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026) is an interim report which will be updated and we look forward to reviewing the final report when it becomes available.

We note from the Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026) that a licence for roosting bats will be required before commencement of any works and recommend that a copy of this is secured by a condition of any consent. This is because surveys undertaken in March 2026 confirmed that Building B12 (T-shaped cow shed) has a bat roost for Common Pipistrelle and Soprano Pipistrelle and tree T59 (Oak) has a confirmed bat roost. We highlight should the LPA be minded to grant permission a European Protected Species Licence copy will need to be submitted as proof and this can be secured by a condition of any consent. The licence will secure appropriate method of works.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, which are European Protected Species. These surveys are required prior to determination. This is because Government Circular 06/2005 identifies that the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Therefore, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed application, is established before planning permission is granted.

This information on protected species 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.

See Appeal Decisions Ref: APP/P1560/W/24/3344547 at The Oaks, Clacton Road Weeley Essex CO16 9EF and APP/W3520/W/17/3174638 Pooles Farm, Thorney Green Road, Stowupland IP14 4AJ, where the appeals were dismissed as one of the main issues was the effect of the proposal on protected species. The Inspector could not be sure that there would be no adverse effect on protected species in the absence of ecological information. We also highlight that this information is also requested by the Inspector even where ecology has not been a reason for refusal.

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 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.

Additional Comments

Bats

We highlight that if any of the numerous trees with PRFs for individual bats (PRFs-I) are to be removed, then 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).

The main site lies approximately 11.2km east and the Christs Hospital site approximately 11.3km east of The Mens Special Area of Conservation (SAC). Therefore, both of these sites are within the 12km Wider Conservation Area for the SAC within which 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 bat, which is the qualifying feature of the SAC. This species was recorded at various locations on site during April, May, June, August and October 2025 (Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026)). In addition, there is one record for this

species within 2km of the site, approximately 1.5km northwest from 2014 (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 149 records of bats within 2km of the site, including Daubenton's, Whiskered, Natterers, Noctule, Brown Long-eared and Soprano and Common Pipistrelle (SxBRC). Four European Protected Species Mitigation Licences have been granted within 2km of the site: a) 1.3km to the north for Brown Long-eared bat and Common Pipistrelle in 2017; b) 1.5km to the north for Brown Long-eared bat and Common Pipistrelle 2015; c) 1.7km to the northeast for Common Pipistrelle and Soprano Pipistrelle 2015; and d) 1.9km to the west for Brown Long-eared and Common Pipistrelle in 2015 ([MAGIC maps](#)).

The main site lies approximately 16.1km east of Ebernoe Common SAC and therefore lies outside the 12km Wider Conservation Area for this SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The main site lies approximately 12.7km northeast of Arun Valley SAC, SPA and Ramsar site.

We also note from the Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026) that the following buildings on site have negligible bat roost potential and therefore no further surveys for bats are required for these buildings:

B1 single-storey metal frame hay shelter, B2 single-storey cattle shed, B3 and B4 large single-storey sheds, B8 single-storey metal shelter, B9 single-storey metal building, B10 single-storey shelter, B13 & B14 single-storey metal shelters, B15 large single-storey barn, B16 single-storey grain store and B17 static caravan.

In general terms, we support the recommendations in the Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026) to retain and enhance existing hedgerows and treelines for foraging and commuting bats, to create new wetland habitats and to implement a long-term management strategy to maintain high quality habitats, particularly as the rare Barbastelle bat has been recorded on site.

Hazel Dormouse

We note from the Environmental Statement Vol II, Appendix 8.8 2025 Dormouse Report (Hankinson Duckett Associates, February 2026) that the surveys undertaken in April, June, August, September and November 2025 on the main site concluded that Hazel Dormouse is likely absent from the site. However, as there are local records for the species and there is suitable habitat onsite, we support the recommendations in Section 5.2 of the Environmental Statement Vol II, Appendix 8.8 2025 Dormouse Report (Hankinson Duckett Associates, February 2026), which need to be secured by a condition of any consent and implemented in full.

We support the non-licensed Precautionary Method Statement for Hazel Dormouse in Section 8.4.2 of the Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal

– Christs Hospital (Hankinson Duckett Associates, January 2026) for the Christs Hospital site. This needs to be secured by a condition of any consent and implemented in full.

Reptiles

We note from the Environmental Statement Vol II, Appendix 8.12 2025 Reptile Survey Report (Hankinson Duckett Associates, February 2026) that the seven surveys for reptiles undertaken in September 2025 concluded that the site supports low numbers of Common Lizard and Grass Snake. Therefore, we support the Precautionary Method Statement for reptiles in the Environmental Statement Vol II, Appendix 8.12 2025 Reptile Survey Report (Hankinson Duckett Associates, February 2026) which needs to be secured by a condition of any consent and implemented in full.

Otter and Water Vole

We understand from the Environmental Statement Vol II, Appendix 8.9 2025 Water Vole and Otter Report (Hankinson Duckett Associates, February 2026) that surveys undertaken in June and October 2025 concluded that neither of these species are present on site. Therefore, we agree that no further surveys for Otter or Water Vole are required.

We support the grassland management measures in the Environmental Statement Vol II, Appendix 8.6 Botanical Survey Report (Hankinson Duckett Associates, February 2026) for the Christs Hospital site and the main site.

We also support the recommendation in the Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal – Christs Hospital (Hankinson Duckett Associates, January 2026) for the implementation of a 15m buffer between the areas of adjacent ancient woodland (irreplaceable habitat) and the development on the Christs Hospital site.

As Barbastelle bat uses the onsite habitat, we also support the recommendation that a Wildlife Friendly Lighting Strategy is implemented (Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026) and Hankinson Duckett Associates, 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.

Breeding and Wintering Birds

We note from the Technical Note Annex C 2026 Wintering and Breeding Bird Survey Report (Hankinson Duckett Associates, May 2026) that no birds listed on Annex 1 of the EU Birds Directive or Schedule 1 of the 1981 Wildlife and Countryside Act (as amended) were recorded nesting on the site, although four Red-listed species (Greenfinch, House Sparrow, Linnet and Tree Sparrow) were recorded with territories on site. In addition, Skylark was recorded as using the site during the wintering bird survey. As the development will result in the loss of open farmland and secondary woodland, we support the recommendations in Section 6 of the Technical Note Appendix C 2026 Wintering and Breeding Bird Survey Report (Hankinson Duckett Associates, May 2026) and recommend that a Farmland Bird Compensation Strategy needs to be secured by a condition of any consent.

Invertebrate species

We welcome the submission of Technical Note Annex D Brown Hairstreak Survey Report (Hankinson Duckett Associates, May 2026) which confirms that surveys in December 2025 recorded Brown Hairstreak butterfly eggs on all areas of the Blackthorn scrub and species-rich hedgerows sampled. We therefore support the recommendations in Section 5 of Technical Note Annex D Brown Hairstreak Survey Report (Hankinson Duckett Associates, May 2026) to retain and enhance existing hedgerows and to plant new scrub and meadow grassland to benefit this species. This needs to be secured by a condition of any consent.

We also support the proposed reasonable biodiversity enhancements for the Christs Hospital site for protected, Priority and threatened species, which have been recommended in the submitted documents (Hankinson Duckett Associates) 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.

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 look forward to working with the LPA and the applicant to receive the additional information required to 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.