



Date: 30 September 2026
Our ref: 21902

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Parkside
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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/26/0913
Location: Land East of Oaklands Henfield Road Cowfold West Sussex
Proposal: Outline planning application for a phased development of approximately 40 residential dwellings, vehicular access, car parking, landscaping, open space and other associated works and infrastructure. All matters reserved except for 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) • European Protected Species (Hazel Dormouse)	☒
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 following documents 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.

- Hazel Dormouse Survey Report (AEWC, August 2026)
- Bat Static Detector Surveys (AEWC, August 2026)

We reviewed previously, Preliminary Ecological Appraisal and Survey Report (AEWC Ltd., February 2026) and Reptile Survey Report (AEWC Ltd., June 2026) (both contained within the Preliminary Ecological Appraisal and Survey Report (Landacre, January and June 2026).

We are not satisfied that there is sufficient ecological information available for determination of this application and recommend that further information with regard to bats and Hazel Dormouse is provided prior to determination. The reasons for this are outlined below:

European Protected Species: bats

The applicant has now provided the results of a Bat Static Detector Surveys (AEWC, August 2026), which addresses one part of our previous comments relating to bats. However, we previously stated there was a need for a Ground Level Tree Assessment (GLTA) to be undertaken prior to determination, the results of which are still outstanding.

As stated previously, we note from the Preliminary Ecological Appraisal and Survey Report (AEWC Ltd., February 2026) that a Ground Level Tree Assessment (GLTA) has not yet been undertaken as it was not known at the time of the survey which trees would be impacted. We therefore recommend that a GLTA should be undertaken and highlight that appropriate compensation for any trees with Potential Roost Features for individual bats (PRFs-I) would 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 would be required for trees with PRFs-I, 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). Any trees with PRFs for multiple bats (PRF-M) would require further assessment if it cannot be clearly demonstrated these will be unimpacted. This is in accordance with [Government Standing Advice](#) which states you should ask for a survey if:

- *distribution and historical records suggest bats may be present*

- *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*

The results of the GLTA assessment, together with any necessary mitigation measures, need to be submitted to the LPA prior to determination.

European Protected Species: Hazel Dormouse

As per the previous recommendation within the PEA, due to the presence of suitable habitat for Hazel Dormouse, the applicant has now provided the results of a Hazel Dormouse Survey Report (AEWC, August 2026). Whilst the survey does generally follow best practice guidelines, we have several queries which need addressing prior to determination to provide the LPA of the certainty of the likely impacts upon European Protected Species Hazel Dormouse.

There is a minor discrepancy in the survey methodology which has not been addressed within the constraints and could skew the probability index. As stated within the guidance, due to neophobic behaviour the footprint tunnels should be in place a minimum of two weeks prior to the survey commencement. However, the tunnels went out 30th April 2026 and the survey commenced on 8th May 2026, which is roughly a week after the tunnels were placed. This constraint should be addressed.

The results should include the weather and if heavy rainfall occurred during the survey period. Heavy rain can damage tracking papers and wash away/ blur footprints, lowering detection success. This information should be provided and the potential constraint should be addressed.

We acknowledge that Footprint tunnel surveys for Dormice do not require a survey licence, but the guidance does state the surveyor needs to be suitably qualified, specifically stating the person is suitably qualified to identify in person Dormouse nests, feeding signs and footprints. As such further detail on the surveyor's competency is required. The submitted Hazel Dormouse Survey Report (AEWC, August 2026) only states they are suitably qualified with no competency details or details of a person who may have verified the dormouse footprint tunnel papers.

Additionally, whilst not an essential requirement of the report, we would expect the report to include photo evidence of some of the footprint papers, to support the assessment.

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.

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 Preliminary Ecological Appraisal and Survey Report (AEWC Ltd., February 2026) that the two field shelters on site have negligible bat roost potential, and we therefore agree that no further bat surveys for these structures are required.

We note from the Reptile Survey Report (AEWC Ltd., June 2026) that seven reptile surveys undertaken during April and May 2026 confirmed the presence of a low population of Grass Snake on site. We support the recommendation in the Reptile Survey Report (AEWC Ltd., June 2026) to retain the reptiles on site with in-situ mitigation under a Reptile Mitigation Strategy and Method Statement. This needs to be secured by a condition of any consent and implemented in full.

We support the implementation of the Precautionary Method Statement for mobile protected and Priority species (including Hedgehog, which is a threatened and Priority species) in Sections 6.17 and 6.19 of the Preliminary Ecological Appraisal and Survey Report (AEWC Ltd., February 2026). This needs to be secured by a condition of any consent and implemented in full.

We also recommend that reasonable biodiversity enhancements for protected, Priority and threatened species should be identified by a suitably qualified ecologist 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 need to be outlined within a separate Biodiversity Enhancement Strategy and 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 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 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.

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