



Date: 7 October 2026
Our ref: 22811

Sophie Moore
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

By email only: planning@horsham.gov.uk

Thank you for requesting advice on this discharge of condition 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: DISC/26/0315
Location: Rushfields High Bar Lane Thakeham West Sussex
Proposal: Approval of details reserved by conditions 9 (CEMP Biodiversity) and 11 (Precautionary Method Statement) to approved application DC/20/2577

Thank you for consulting Place Services on the above discharge of Condition application. We can only comment on Conditions related to ecology.

Condition

Condition 9: Further Information Required

Pre-Commencement Condition : No development shall commence until 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 Local Planning Authority 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) and Policy 31 of the Horsham Development Framework (2015).

Condition 11: Further Information Required

Pre-Commencement Condition: Prior to the commencement of development, a Precautionary Method Statement for reptiles shall be submitted to and approved in writing by the local planning authority. This will contain precautionary mitigation measures and/or works to reduce potential impacts to reptiles during the construction phase. The measures and/works shall be carried out strictly in accordance with the approved Details and shall be retained in that manner thereafter.

Reason: To conserve protected and Priority species and allow the Local Planning Authority 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) and to accord with Policy 31 of the Horsham District Planning Framework (2015).

Comments

We have reviewed the Ecological Construction Management Plan (CEMP) (ecosupport, September 2026) and the Reptile Precautionary Working Method Statement) (ecosupport, September 2026) which has been submitted in order to discharge Condition 9 and 11.

Regarding Condition 9, we are not satisfied that the submitted information includes the detail required by this Condition. There are some inconsistencies within the CEMP which need addressing and some inconsistencies between this document and the Reptile Precautionary Working Method Statement) (ecosupport, September 2026) which need

addressing. The Great Crested Newt Section 5.3.1 states “*Any amphibians present on site will be translocated from works area into the receptor site under precautionary working methods involving sensitive habitat removal.*” No details of a receptor site, including its location and whether this methodology was approved for GCN without a licence has been provided. We note the recommendation of moving GCN to a receptor site contradicts the note present at the end of this section which states if GCN are found all work must stop and a licence obtained. As such further clarity on the recommendation of a receptor site is required before we can recommend discharge.

Additionally, when cross referencing the reptile and GCN sections regarding sensitive habitat removal these two sections do not align. With the GCN section recommending vegetation is cut to 50cm and then 10cm, whereas the reptile Section recommends strimming to 15cm. Clarity on why the staged vegetation clearance varies should be provided.

Regarding what temperatures works can be undertaken in, the reptile and GCN Section states 12C, which we would agree with, however, Table 3 within the CEMP states 15C. Clarity on this should be provided.

Regarding other species we are satisfied the information is sufficient.

Regarding Condition 11, we are not satisfied that the submitted information includes the detail required by this Condition. The described sensitive habitat removal lacks detail regarding direction of cutting. Which should be established to ensure the recommendations are appropriate. There are various methods with regard to this process, usually starting centrally within the site, working outwards to allow any reptiles or amphibians ahead of the ECoW to naturally disperse into the retained areas of habitat. We note the CEMP includes a plan for direction, which should be included within the Reptile Precautionary Working Method Statement) (ecosupport, September 2026).

The CEMP if to include reptile mitigation measures should be in line with the recommendations within the Reptile Precautionary Working Method Statement) (ecosupport, September 2026), of which it currently is not and the directional cutting should be included within the document.

Recommendation

We are unable to recommend the discharge of Condition 9 and 11 until the additional information outlined above has been provided.

Please do not hesitate to contact us if you have any queries in relation to this advice.

Yours sincerely,

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.

Place Services have a policy relating to the use of AI. Unless otherwise stipulated, any AI use will be limited to basic proof-reading, grammar, and spelling correction. This response has been reviewed by the author(s). If you have any queries, please [contact us](#) for information about our AI guidance.

