



Date: 29 September 2026
Our ref: 21998

Alice Johnson
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

By email only: planning@horsham.gov.uk

Thank you for requesting advice on this reserved matter 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/26/1236
Location: Land South of Furze Common Road Thakeham West Sussex
Proposal: "Reserved matters application for up to 28 dwellings following approval of outline application DC/23/2146 relating to access, appearance, landscaping, layout and scale."

Thank you for consulting Place Services on the above reserved matters application.

No ecological objection	☐
Recommend approval subject to attached conditions	☐
Further information required/Temporary holding objection on: • Statutory Designated Sites (The Mens SAC) • European Protected Species (bats)	☒
Recommend Refusal	☐

Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☒
---	---

Summary

We have reviewed the documents supplied by the applicant, relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation.

Additionally, we have reviewed the documents submitted at outline (DC/22/0080), which includes Preliminary Ecological Appraisal (Arbtech, October 2023) and the Reptile Presence/ Absence Surveys (Arbtech, October 2017). Furthermore, the outline application was allowed at appeal (Appeal reference: APP/Z3825/W/25/3365902), of which we have reviewed the decision notice for.

We are not satisfied that there is sufficient ecological information available for approval of this reserved matter application. The reasons for this are outlined below:

The site lies approximately 9.07km northwest of The Mens Special Area of Conservation (SAC) and therefore lies within the 12km Wider Conservation Area for this SAC, for which significant impacts or severance to flightlines must be considered. The qualifying feature for The Mens SAC is Barbastelle bat.

Further detail is required before the layout can be approved to ensure the proposals will not indirectly impact the integrity of the Mens SAC, by impacting through increased lighting the qualifying species, Barbastelle Bat, which might utilise the bordering habitats for commuting and foraging.

We therefore consider that there is currently insufficient information to aid the LPA in the preparation of a project level HRA Appropriate Assessment to record its decision and consult Natural England on the conclusion. Additionally, we cannot see that an Appropriate Assessment was prepared at outline stage or at appeal.

Condition 10, which relates to the layout of lighting, should be provided concurrent with the reserved matter application, to ensure any approved layout has suitable lighting provisions, which will not illuminate boundary habitats. As such, this information is required. Any lighting should be in line with best practice guidance GN:08/23 from the Institute of Lighting Professionals¹.

Regarding roosting bats, there are several trees along the access track which we understand will be subject to a crown lift. These trees should be subject to a Ground Level

¹ <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

Tree Assessment (GLTA), for Potential Roost Features (PRFs) for bats is required on all trees which are proposed for removal/ reduction. We highlight that if any trees have PRFs for Individual bats (PRFs-I), 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). In addition, 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). If any trees have PRFs for Multiple bats (PRFs-M), then further assessment will be required. This survey is in accordance with Government Standing Advice which says that 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

We note, Condition 11 states the following:

“(i) At no time either during construction or within a period of 5 years after the completion of the development, shall any of the existing trees or hedgerows on the site be cut down, uprooted, removed or destroyed, nor shall any such tree or hedge be lopped, topped, pruned or reduced, other than in accordance with the proposals set out in paragraph 5.2.1 of the Arboricultural Impact Assessment and Method Statement by Greenspace Ecological Solutions, dated November 2023. (ii) In the case of trees T5, T6, T9, T11 and T28, the approved crown lifting works shall not be carried out until an aerial inspection has been carried out to establish the presence or absence of any active bat roosts. In the event that any such roost is found to be present, no works shall be carried out to the tree in question until a bat mitigation scheme has been submitted to the local planning authority and approved in writing. Any such scheme shall include details as to the timing of the relevant mitigation measures. Thereafter, the tree works and mitigation measures shall be carried out in accordance with these approved details. (iii) If, during the construction of the development or within 5 years from its completion, any retained tree or hedge is removed, destroyed or dies, it shall be replaced within the first available planting season by a new tree or hedge, of a size and type that shall have been approved in writing by the local planning authority.”

As per Condition 11, no construction activities can proceed until the results of the aerial inspection for bats and potential roost features has been undertaken. This is a material consideration with regard to ensuring the layout is appropriate. As such, Condition 11, should be provided concurrent with the reserved matter application, to ensure bats and their

roosts can be appropriately mitigated and compensated for if required. See [Government Standing Advice](#).

As a result, we recommend that the applicant's ecologist provides an ecological addendum or an updated ecological report to support this application, which should require an additional site visit and may require updated desk study information. The ecologist will be required to provide appropriate justification, on:

- The validity of the initial report;
- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey(s).

If additional impacts to protected species are identified as a result of the additional ecological assessment, then any necessary further surveys for protected species should also be provided prior to determination. This is necessary as the Government 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."

Additionally, secured at appeal were the following relevant conditions:

- Condition 4: Completion of pre-construction ecological mitigation measures detailed within the Preliminary Ecological Appraisal and the Great Crested Newt and Reptile Mitigation Plan (both by 'Arbtech', dated October 2023).
- Condition 9: Biodiversity Enhancement Scheme
- Condition 10: Lighting Scheme
- Condition 11: Aerial Inspection for potential bat roosts and mitigation strategy.

The applicant has not sought to discharge any of these conditions with this application. We look forward to commenting on the above conditions when the applicant seeks to discharge

² CIEEM (2019) Advice note on the Lifespan of Ecological Reports and Surveys - <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

these conditions. As stated above, Conditions 10 and 11 should be submitted concurrent with reserved matters to ensure the information is appropriate.

We look forward to working with the LPA and the applicant to receive the additional information required to support a lawful approval and overcome our holding objection.

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

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.

