



Date: 22 June 2026

Our ref: 18135

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By email only: planning@horsham.gov.uk

CONTAINS SENSITIVE INFORMATION

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/26/0671
Location: Land Off Old Crawley Road Faygate West Sussex
Proposal: Outline Application for a development of up to 120 dwellings (including 45% affordable) with all matters reserved except for access.

Thank you for consulting Place Services on the above outline 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 Councils advice regarding Water Neutrality requirements following Natural England's Withdrawal Statement (31st October 2025).

Summary

We have reviewed the Ecological Impact Assessment (The Ecology Co-op, March 2026), relating to the likely impacts of development on protected & Priority species and habitats, and identification of proportionate mitigation. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We are satisfied that there is sufficient ecological information available to support determination of this application. The reasons for this are outlined below:

Nest tube surveys for Hazel Dormouse were conducted in 2019. The ecological report has given sufficient justification to support the age of the survey data, particularly as the core habitat is being retained and buffered, with only a small section of hedgerow to be removed to allow access. The 2019 surveys returned one positive record, in an area no longer included within the application, but connected to the site by linear habitat. We support the implementation of a non-licensed Precautionary Method Statement (PMS) for Hazel Dormouse which is recommended in section 5.6.2 of the Ecological Impact Assessment (The Ecology Co-op, March 2026)). The measures as detailed within Section 5.6.2 outline the general non-licensed precautionary measures. The applicant will need to submit a detailed on-licensed Precautionary Method Statement (PMS) for Hazel Dormouse, which should be secured by a condition of any consent.

We have considered the likely impacts on European Protected Species and applied the Favourable Conservation Status licensing test to demonstrate that the LPA, as a competent authority, has had regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) as this must not be left until the licence application stage when reaching planning decisions.

We note from the Ecological Impact Assessment (The Ecology Co-op, March 2026) that there are no buildings on site and no trees will be removed. However, the Horsham case officer has advised it is their understanding that the current outline proposals will require the removal of several trees along the western boundary to allow access. None of these trees were identified to have any bat roost potential, as such we are still satisfied and therefore, we agree that no further surveys for bats are required. We welcome the retention of the boundary habitats (with the exception of 30m of the western boundary for access) where bat activity surveys identified the majority of bat foraging and commuting activity taking place by eight species of bat, including the rare Barbastelle. We also support the implementation of the 15m buffer zone between the development and the area of woodland to the east (Section 5.2.2 Ecological Impact Assessment (The Ecology Co-op, March 2026)). This should be secured by a condition of any consent and implemented in full.

We also support the implementation of Skylark plots in adjacent arable fields within the blue line boundary to compensate for the loss of Skylark breeding habitat (Section 5.5.4

Ecological Impact Assessment (The Ecology Co-op, March 2026)). This should be secured by a condition of any consent and implemented in full.

We also support the implementation of the Precautionary Method Statement for reptiles and mobile protected (Badger) and Priority species (including Hedgehog, which is a Priority and threatened species) in Section 5.3.1 - 5.3.4 of the Ecological Impact Assessment (The Ecology Co-op, March 2026). This should be secured by a condition of any consent and implemented in full. This can be detailed within a Construction and Environmental Management Plan – Biodiversity.

We also support the recommendation that the finalised mitigation measures should be provided in a Construction and Environmental Management Plan - Biodiversity (Ecological Impact Assessment (The Ecology Co-op, March 2026)). This needs to be secured as a pre-commencement condition of any consent and implemented in full.

The mitigation measures identified in the Ecological Impact Assessment (The Ecology Co-op, March 2026) 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.

We also support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Ecological Impact Assessment (Urban Edge Environmental Consulting, February 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.

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 recommend that the NatureSpace Partnership is consulted on this application.

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.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).

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 Co-op, March 2026) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

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. CONCURRENT WITH RESERVED MATTERS: PRIOR TO COMMENCEMENT: NON-LICENCED PRECAUTIONARY METHOD STATEMENT (PMS) FOR HAZEL DORMOUSE

“A Hazel Dormouse Non-Licensed Precautionary Method Statement 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 Hazel Dormouse 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 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. CONCURRENT WITH RESERVED MATTERS: PRIOR TO COMMENCEMENT: FARMLAND BIRD COMPENSATION STRATEGY

“A Farmland Bird Compensation Strategy shall be submitted to and approved by the local planning authority to compensate the loss or displacement of any Farmland Bird territories identified as lost or displaced. This shall include provision of offsite compensation in nearby agricultural land, prior to commencement.

The content of the Farmland Bird Compensation Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed compensation measure e.g. Skylark plots;*
- b) detailed methodology for the compensation measures e.g. Skylark plots must follow Agri-Environment Scheme option: ‘AB4 Skylark Plots’;*
- c) locations of the compensation measures by appropriate maps and/or plans;*
- d) persons responsible for implementing the compensation measure.*

The Farmland Bird Compensation Strategy shall be implemented in accordance with the approved details and all features shall be retained for a minimum period of 10 years.”

Reason: To allow the LPA to discharge its duties under the NERC Act 2006 (as amended)

4. CONCURRENT WITH RESERVED MATTERS: 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) Precautionary Method Statement for reptiles, Badger and Hedgehog.*
- b) Risk assessment of potentially damaging construction activities.*
- c) Identification of “biodiversity protection zones”.*
- d) 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).*
- e) The location and timing of sensitive works to avoid harm to biodiversity features.*
- f) The times during construction when specialist ecologists need to be present on site to oversee works.*
- g) Responsible persons and lines of communication.*
- h) The role and responsibilities on site of an ecological clerk of works (ECOW) or similarly competent person.*
- i) 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).

5. CONCURRENT WITH RESERVED MATTERS: 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 in line with the recommendations of the Ecological Impact Assessment (The Ecology Co-op, March 2026), 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).

6. CONCURRENT WITH RESERVED MATTERS: 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 and internal lighting will be installed (through provision of lighting layout plans, isolux contour plans, vertical and horizontal illuminance assessments, internal light spill assessment, luminaire specifications, mounting heights, aiming angles, shielding measures, and lighting control strategies) 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 do not hesitate to contact us if you have any queries in relation to this advice.

Hayley Dean MCIEEM MSc BSc (Hons)

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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.