Place Services
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Our ref: 23468

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By email only: planning@horsham.gov.uk

Thank you for requesting advice on this 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/26/0660
Location: Ingfield Manor School Ingfield Manor Drive Five Oaks Billingshurst
Proposal: Expansion of the existing school including the construction of 3 linked single-storey buildings, a sports hall, playground, parking, landscaping, drainage, and associated development, following demolition of redundant buildings

Thank you for re-consulting Place Services on the above 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	☐

Summary

We have previously reviewed the Ecological Impact Assessment Revision 1 (ECOSA, March 2026) and Preliminary Ecological Appraisal (The Ecology Co-op, October 2025), relating to the likely impacts of development on designated sites, protected and Priority species and habitats and the identification of proportionate mitigation. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house. We have now reviewed the Ecological Impact Assessment Rev 2 (ECOSA, Jul 2026).

We are still satisfied that there is sufficient ecological information available to support determination of this application. Our revised comments relate only to Great Crested Newt, the other comments remain unchanged and are included for posterity.

Designated sites:
The site lies approximately 5.9km northwest of The Mens Special Area of Conservation (SAC) (MAGIC maps) and is therefore within the 6.5km Key Conservation Area for this SAC, within which all impacts must be assessed as the habitats within this zone are considered critical for sustaining the populations of Barbastelle bats within the SAC, the qualifying feature of the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 10.5km east of Ebernoe Common Special Area of Conservation (SAC) and therefore lies within the 12.0km Wider Conservation Area for this SAC. However, there are no records for this species within 2km of the site. No European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site (MAGIC maps). There are approximately 17 records of bats within 2km of the site, including Common Pipistrelle and Brown Long-eared Bat (SBISx – accessed under licence).

With regard to tree loss in relation to impacting foraging and commuting habitats, we have reviewed additionally the Arboricultural Impact Assessment & Method Statement (Lizard, March 2026). Additionally, we have reviewed the Arboricultural Consultant Comments which state "*The extent of tree removal will not have a significant impact on the surrounding landscape setting, subject to appropriate landscape mitigation/planting. Arboricultural impacts are considered to be relatively limited and can be reasonably controlled by compliance conditions."* We are satisfied the plans demonstrate the proposed tree removal will not significantly impact upon the sites use a foraging/ commuting resource.

As there is a potential for habitat fragmentation from light spill of potentially functionally linked land for Barbastelle bats, this has been screened in and will need to be considered at Stage 2 Appropriate Assessment of the LPA's project level Habitats Regulations Assessment (HRA).

European Protected Species: Great Crested Newt
We were instructed to comment on Great Crested Newts for this application, in place of NatureSpace Partnership, as the applicant will not be pursuing a strategic licencing scheme, but rather a tradition EPS Mitigation Licence from Natural England. Great Crested Newt were found in ponds 6, 7 and 8, additionally, the site was assessed as having suitable terrestrial habitat. We have corresponded with the case officer prior to providing these comments, requesting that further justification be provided regarding the validity of the survey data to ensure the mitigation strategy outlined within the Ecological Impact

Assessment Rev 2 (ECOSA, Jul 2026) is appropriate and that the data would be considered valid by Natural England to issue a EPS mitigation licence. This justification has now been provided, including evidencing this with the EPSM Method Statement. We recommend a copy of the licence is submitted to the LPA as proof and secured by a condition of any consent.

European Protected Species: bats
We note from the Ecological Impact Assessment Rev 2 (ECOSA, Jul 2026) that a licence for bats will be required before commencement of any works and recommend that a copy of this is secured by a condition of any consent. Updated emergence surveys have now been undertaken and noted several Day roosts within Building 1 and within Building 8.

Additionally, a Ground Level Tree Assessment for bats has now been undertaken. Several trees were assessed as being PRF-I, as such precautionary measures should be detailed, including details of proposed suitable compensation measures which would need to be in place prior to the loss of any roost resource in accordance with UK Bat Mitigation Guidelines v1.2 CIEEM (Reason and Wray, August 2025). This information should be detailed within a Biodiversity Method Statement and secured by a condition of any consent.

European Protected Species: Hazel Dormouse
As stated previously, we support the implementation of a non-licensed Precautionary Method Statement (PMS) for Hazel Dormouse (Section 5.7.2 Ecological Impact Assessment Revision 1 (ECOSA, March 2026)). We are now satisfied the outline measures as detailed within Section 5.7.2 of Revision 2 of the EcIA are appropriate. We recommend the final details, with any plans, showing the sites constraint zones and what to do in the event any Hazel Dormouse are found, are to be detailed within a Biodiversity Method Statement and secured by a condition of any consent.

Protected Species: reptiles
We note from the Ecological Impact Assessment Revision 1 (ECOSA, March 2026) that seven site visits in September and October confirmed that the site holds a ‘low’ population of Slow Worm and we therefore support the implementation of a reptile mitigation strategy, which will include translocation of reptiles. We have now reviewed the Ecological Impact Assessment Rev 2 (ECOSA, Jul 2026) and we are satisfied the identified mitigation and translocation location are appropriate, as detailed within section 5.9.2. We recommend these are fully detailed, including plans within a Biodiversity Method Statement and 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.

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.

The mitigation measures identified in the Ecological Impact Assessment Rev 2 (ECOSA, Jul 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 support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (We support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Ecological Impact Assessment Revision 1 (ECOSA, March 2026)) to avoid impacts from light disturbance.) to avoid impacts from light disturbance. We recommend that any external lighting is sensitive to wildlife and secured by a condition of any consent to avoid impacts to foraging and commuting bats. This must follow the Guidance Note 8 Bats and artificial lighting (The Institute of Lighting Professionals & Bat Conservation Trust). In summary, it is highlighted that the following measures should be implemented for the lighting design, which could be informed by a professional ecologist:

- 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 support the proposed reasonable biodiversity measures for protected, Priority and threatened species, as outlined in National Policy N2 (f) of the National Planning Policy Framework (August 2026). Reasonable biodiversity measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Measures Strategy to be secured as a condition of any consent.

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 Rev 2 (ECOSA, Jul 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. **PRIOR TO COMMENCEMENT ACTION REQUIRED: SUBMISSION OF A COPY OF NATURAL ENGLAND MITIGATION LICENCE FOR GREAT CRESTED NEWT**
   "*Any works which will impact the resting place of Great Crested Newt, shall not in in any circumstances commence unless the local planning authority has been provided with either:*
   a) *a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or*
   b) *a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence."*

   Reason: To conserve protected 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 s17 Crime & Disorder Act 1998.

3. **PRIOR TO COMMENCEMENT OF ANY WORKS WHICH WILL IMPACT THE BREEDING / RESTING PLACE OF BATS: SUBMISSION OF A COPY OF EPS MITGATION LICENCE**
   "Any works which will impact the breeding / resting place of bats, shall not in in any circumstances commence *unless the local planning authority has been provided with either:*
   a) *a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or*
   b) *evidence of site registration supplied by an individual registered to use a Bat Mitigation or Earned Recognition Class Licence; or*
   c) *a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence."*

   Reason: To conserve protected 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 s17 Crime & Disorder Act 1998.

4. PRIOR TO COMMENCEMENT: PRECAUTIONARY BIODIVERSITY METHOD STATEMENT

"No development shall take place (including any demolition, ground works, site clearance) until a Precautionary Biodiversity Method Statement for protected and Priority species (Dormice, bats, reptiles and [redacted]) has been submitted to and approved in writing by the local planning authority.

The content of the method statement shall include the following:

a) *purpose and objectives for the proposed works;*
b) *detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);*
c) *extent and location of proposed works shown on appropriate scale maps and plans;*
d) *timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;*
e) *persons responsible for implementing the works;*
f) *initial aftercare and long-term maintenance (where relevant);*
g) *disposal of any wastes arising from works.*

The 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), s40 of the NERC Act 2006 (as amended) and s17 Crime & Disorder Act 1998.

5. PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY MEASURES STRATEGY

"Prior to any works above slab level, a Biodiversity Measures Strategy for protected, Priority and threatened species, prepared by a suitably qualified ecologist in line with the recommendations of the Ecological Impact Assessment Rev 2 (ECOSA, Jul 2026), shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Measures 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 National Policy N2 1(f) of NPPF August 2026 and s40 of the NERC Act 2006 (as amended).

6. **PRIOR TO BENEFICIAL USE: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**

"*Prior to beneficial use, 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.

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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.

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