Place Services
Essex County Council
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Date: 18 November 2026
Our ref: 24089

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Horsham District Council
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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/26/1168
Location: Land North of Melton Drive Storrington West Sussex
Proposal: Outline application, with all matters reserved, for the phased development comprising: Phase 1 construction of the access road (to be delivered through a subsequent Reserved Matters Application pursuant to Outline Permission DC/24/2006); and Phase 2 residential development of up to 56 dwellings with associated landscaping, pedestrian and vehicular access

Thank you for re-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 April 2026) and the ecological addendum (The Ecology Co-op, October 2026) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of proportionate mitigation. Please note that comments on mandatory biodiversity net gain are provided by Horsham District Council in-house. We have now additionally reviewed the Natural England Consultation Response (Ref: 562243, 5th November 2026) and the Ecology Letter Relating to Ancient Woodlands (The Ecology Co-op, 6th November 2026).

Our previous concerns regarding Irreplaceable Habitats (Ancient Woodland) have now been addressed and we have provided further comments on this below. We note the other included comments are unchanged and are included for posterity. We are now satisfied that there is sufficient ecological information available to support determination of this application.

Designated Sites:

The site lies approximately 9.1km southeast of The Mens Special Area of Conservation (SAC) (MAGIC maps) and is therefore within the 12.0km Wider Conservation Area for this SAC, within which significant impacts or severance to flightlines must be considered. This is because the Wider Conservation Area is the full extent of the range of foraging areas required by Barbastelle bats, which are the qualifying feature of the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 14.9km southeast of Ebernoe Common Special Area of Conservation (SAC) and therefore lies outside the 12.0km Wider Conservation Area for this SAC and lies approximately 3.6km east of Arun Valley SAC, SPA and Ramsar site.

It is our understanding that will be no severance to the flight lines of foraging or commuting bats from the SAC and habitat connectivity within the site will be maintained. We would like to address that there will be a small section of boundary vegetation removal along the western boundary, however, this is not considered significant in terms of impacts to habitat connectivity in relation to these proposed plans.

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 therefore believe that, with mitigation, there will be no Adverse Effect on Integrity of the SAC. We advise the LPA to prepare a project level HRA Appropriate Assessment to record its decision and retain on file. We note Natural England have already been consulted and do not require re-consultation.

Irreplaceable Habitat: Ancient Woodland

We previously commented that we had been provided with additional information relating to the site and the *"Formal designation of a woodland strip north of Storrington as 'ancient woodland"* which includes correspondence from Philip Jones and Natural England Ancient Woodland Inventory Programme Manager which took place in 2024. This correspondence pertains to the two bordering woodland strips along the southern and eastern strips, which were both surveyed by a suitably qualified person and found to classify as Ancient Woodland. We noted, that the correspondence from Natural England indicated that the parcels are below 0.25 hectares and thus would not be included in the inventory, as visible on MAGIC, but the woodlands would still be subject to the same protections detailed within the NPPF, regardless of their size if found to be Ancient.

We have now reviewed the Ecology Letter Relating to Ancient Woodlands (The Ecology Co-op, 6th November 2026) which addressed our concerns. We note the document states Natural England did not find the strip to be ancient, this was not the context of their comments, the comments were only advisory and indicated there could be ancient origins, but the habitats are of an area too small to be included on the mappable inventory. The Natural England response did not provide a definitive opinion regarding whether they found the woodland to be ancient or not. We now have access to detailed maps from the National

Tithe Record Collection of which we have used to inform our desktop assessment. Those historic maps do not show any linear features bordering the site, only the linear features, located offsite. As such, with the evidence provided within the Ecology Letter Relating to Ancient Woodlands (The Ecology Co-op, 6th November 2026) and the results of the Place Services desktop assessment, we are satisfied the recommendation within point two of the submitted additional information is appropriate "*To assess both belts as priority habitat deciduous woodland of local value and consider the imbedded mitigation and compensation prescribed through the scheme on this basis.*"

We recommend the mitigation measures are detailed within a Construction Environmental Management Plan (CEMP): Biodiversity and the compensation measures detailed within the Biodiversity Compensation and Enhancement Measures Strategy. These should be secured by a condition of any consent. We would encourage the compensation strategy is informed by updated spring botanical surveys, to assess the woodland flora, as there were queries regarding the validity of botanical list provided within the information which was requesting the woodlands be added to the Ancient Woodland Inventory.

We have no objections on ecological matters excluding Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the NatureSpace Partnership.

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 (The Ecology Co-op April 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 proposed reasonable biodiversity measures for protected, Priority and threatened species, as outlined in National Policy N2 1(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 Compensation and Enhancement 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) and delivery of mandatory Biodiversity Net Gain.

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 April 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: TIME LIMIT ON DEVELOPMENT BEFORE FURTHER SURVEYS ARE REQUIRED

"If the development hereby approved does not commence within one year from the date of the planning consent, the approved ecological mitigation measures secured through condition shall be reviewed and, where necessary, amended and updated. This is based on the Advice Note for the Lifespan or Ecological reports and surveys (CIEEM,2019).

The review shall be informed by further ecological surveys commissioned to:

i. establish if there have been any changes in the presence and/or abundance of bats and Badger likely to be present and
ii. identify any likely new ecological impacts that might arise from any changes.

Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and

approved in writing by the local planning authority prior to the commencement of development.

Works will then be carried out in accordance with the proposed new approved ecological measures and timetable."

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).

3. 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) 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 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).

4. CONCURRENT WITH RESERVED MATTERS: PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY COMPENSATION AND ENHANCEMENT MEASURES STRATEGY

"Prior to any works above slab level, a Biodiversity Compensation and Enhancement Measures Strategy for protected, Priority and threatened species, prepared by a suitably qualified ecologist, shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Compensation and Enhancement Measures Strategy shall include the following:

a) Purpose and conservation objectives for the proposed measures or features;
b) detailed designs or product descriptions to achieve stated objectives;
c) locations of proposed measures or features by appropriate maps and plans (where relevant);
d) persons responsible for implementing the measures or features; 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 support 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).

5. 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.

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.