Place Services
Essex County Council
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Date: 23 November 2026 Our ref: 24499

Tamara Dale
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

By email only: Planning Department, 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/26/1159**
Location: **The Hyde Rusper Road Ifield West Sussex RH11 0LN**
Proposal: **Outline Application for the erection of up to 4 dwellings with all matters reserved except access.**

Thank you for further 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 Bat Preliminary Ground Level Tree Roost Assessment (The Ecology Partnership, November 2026) and Preliminary Ecological Appraisal (The Ecology Partnership, July 2025) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation

measures. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We note from the Preliminary Ecological Appraisal (The Ecology Partnership, July 2025) that there is a single shed on the site, which has negligible bat roost potential. We also note from the Bat Preliminary Ground Level Tree Roost Assessment (The Ecology Partnership, November 2026) that tree T5 (Hornbeam) and one tree in G4 (Monterey Cypress group) will be removed for the development and both trees have Potential Roost Features for individual bats (PRFs-I). Therefore, we highlight that appropriate compensation is 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). We support the non-licensed Precautionary Working Method Statement for bats in Section 4.4 of the Bat Preliminary Ground Level Tree Roost Assessment (The Ecology Partnership, November 2026), which should include inspection of the 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).

We also support the Precautionary Method Statement for reptiles, common amphibians and mobile protected and Priority species (including Hedgehog, which is a threatened and Priority species) in Sections 4.23 and 4.27 of the Preliminary Ecological Appraisal (The Ecology Partnership, July 2025)). This should be secured by a condition of any consent and implemented in full.

We are now satisfied that there is sufficient ecological information available to support determination of this application. However, 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.

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 Bat Preliminary Ground Level Tree Roost Assessment (The Ecology Partnership, November 2026) and Preliminary Ecological Appraisal (The Ecology Partnership, July 2025) 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, including bats, reptiles, common amphibians and mobile protected and Priority species.

If external lighting is required, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Bat Preliminary Ground Level Tree

Roost Assessment (The Ecology Partnership, November 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 support the proposed reasonable biodiversity measures for protected, Priority and threatened species, which have been recommended in the Bat Preliminary Ground Level Tree Roost Assessment (The Ecology Partnership, November 2026) and Preliminary Ecological Appraisal (The Ecology Partnership, July 2025)) to secure net gains for biodiversity, as outlined under the National Planning Policy Framework (August 2026) N2 Part F. Reasonable biodiversity measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Measures Layout 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 Bat Preliminary Ground Level Tree Roost Assessment (The Ecology Partnership, November 2026) and Preliminary Ecological Appraisal (The Ecology Partnership, July 2025), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. This includes the Precautionary Method Statement for reptiles, common amphibians and mobile protected and Priority species in Sections 4.23 and 4.27 of the Preliminary Ecological Appraisal (The Ecology Partnership, July 2025), which avoids impacts on protected species.

This may 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 ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY MEASURES LAYOUT

"A Biodiversity Measures Layout for the biodiversity measures listed in the Bat Preliminary Ground Level Tree Roost Assessment (The Ecology Partnership, November 2026) and Preliminary Ecological Appraisal (The Ecology Partnership, July 2025) shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Measures Layout shall include the following:

a) detailed designs or product descriptions for biodiversity measures; and
b) locations, orientations and heights for biodiversity measures on appropriate drawings.

The biodiversity measures shall be implemented in accordance with the approved details prior to occupation and all features shall be retained in that manner thereafter."

Reason: To enhance protected and Priority species & habitats and allow the LPA to discharge its duties under the National Planning Policy Framework (August 2026) N2 Part F and s40 of the NERC Act 2006 (as amended).

If external lighting is required:

3. 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 lighting will be installed (through provision of lighting layout plans) 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).

4. CONCURRENT WITH RESERVED MATTERS: TIME LIMIT ON DEVELOPMENT BEFORE FURTHER SURVEYS ARE REQUIRED

"If the application 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.

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, reptiles, common amphibians and mobile and protected species 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 the erection of up to 4 dwellings.

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).

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.

AI may have been used in the preparation of this response, but its 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.