



Date: 23 June 2026

Our ref: 18321

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Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

By email only: Planning Department, 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 West Sussex RH14 9AX
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 consulting Place Services on the above application.

No ecological objection	☐
No ecological objection subject to attached conditions	☐
Further information required/Temporary holding objection: • European Protected Species (bats, Hazel Dormouse) • Protected species (reptiles)	☒
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 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 are not satisfied that there is sufficient ecological information available for determination of this application and recommend that further information relating to reptiles is required to make this proposal acceptable prior to determination. The reason for this is outlined below:

European Protected Species: bats

We note from the Ecological Impact Assessment Revision 1 (ECOSA, March 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. However, Section 4.4.2 of the Ecological Impact Assessment Revision 1 (ECOSA, March 2026) states that the results of the bat emergence surveys on four of the seven buildings on site are currently unknown, although a survey in 2025 identified a bat roost in void 1 of Building 1 (main staff hostel) (Preliminary Ecological Appraisal (The Ecology Co-op, October 2025)). In addition, surveys carried out by ECOSA in 2019 identified a maternity bat roost and numerous Common Pipistrelle day roosts in Building 1 and Common Pipistrelle and Soprano Pipistrelle day roosts in Building 8 (Ecological Impact Assessment Revision 1 (ECOSA, March 2026)). We support the outline mitigation measures in Section 5.5.2 of the Ecological Impact Assessment Revision 1 (ECOSA, March 2026)

In addition, Section 4.4.1 of the Ecological Impact Assessment Revision 1 (ECOSA, March 2026) states that a Ground Level Tree Assessment for bats has not yet been undertaken although the site has suitability to support tree roosting bats. Therefore, an assessment of any likely impact to roosting bats will be required prior to determination to inform the need for further assessment and mitigation measures in accordance with the 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023). [Government Standing Advice](#) says you should ask for a survey if:

- *distribution and historical records suggest bats may be present*
- *the development site includes or is close to [any built structures](#)*
- *the development site includes or is close to [trees](#).*

European Protected Species: Hazel Dormouse

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)). This is because there is suitable habitat for this species on site although Hazel Dormouse surveys in October, November and December 2025 found no evidence of this species. We recommend that the outline measures for the non-licensed PMS are submitted

to the LPA prior to determination. This information is required under [Government Standing Advice](#).

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. If translocation of reptiles to an off-site receptor site is required, we highlight that [Government Standing Advice](#) says:

If translocating reptiles, the proposal needs a receptor site:

- *close to the development site, and within the same LPA if possible*
- *that is at least the same size as the habitat that will be lost, and larger if the lost habitat is of high quality*
- *that will serve the same function as the habitat to be lost, for example it has hibernation features*
- *with similar habitat to the area that will be lost, including water bodies*
- *that does not currently support the same species, but can be improved to make it suitable*
- *that will be safe from future development and managed in the long term*

This means that the receptor site must be identified and assessed to ensure it meets these requirements and it has sufficient carrying capacity for the translocated reptile populations. We recommend that the assessment is submitted to the LPA prior to determination.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats and Hazel Dormouse, which are European Protected Species, and reptiles, which are protected Species.

The information is required prior to determination because paragraph 99 of the ODPM 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."*

This information is therefore required to provide the LPA with certainty of likely impacts on legally protected species and be able to secure appropriate mitigation either by a mitigation licence from Natural England or a condition of any consent. This will enable the LPA to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006 (as amended) and prevent wildlife crime under s17 Crime and Disorder Act 1998.

Furthermore, the Local Planning Authority, as a competent authority, should have regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) when reaching planning decisions including the Favourable Conservation Status licensing test and must not leave this until the licence application stage. Therefore, if a European Protected Species Mitigation Licence is required for this application, appropriate mitigation measures to support the provision of the licence must also be outlined prior to determination to allow certainty to the LPA that a licence will likely be granted.

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

Additional comments

We support the implementation of the Precautionary Method Statement for mobile protected and Priority species (including Hedgehog, which is a Priority and threatened species) in Section 5.6.2 of the Ecological Impact Assessment Revision 1 (ECOSA, March 2026). This needs to be secured by a condition of any consent and implemented in full.

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).

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. 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 enhancements for protected, Priority and threatened species, which have been recommended in the Ecological Impact Assessment Revision 1 (ECOSA, March 2026) 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 should be outlined within a separate Biodiversity Enhancement Layout and should be secured by a condition of any consent.

Please note 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 as a non-licensed Precautionary Method Statement for GCN is recommended in the Ecological Impact Assessment Revision 1 (ECOSA, March 2026).

We look forward to working with the LPA and the applicant to receive the additional information required to support a lawful decision 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.

