Place Services
Essex County Council
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Date: 18 November 2026 Our ref: 23753

Bethan Tinning
Horsham District Council
Parkside
Horsham
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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/26/1475**
Location: **Land To The Rear of The Hermitage Tower Hill Horsham West Sussex RH13 0JS**
Proposal: **Erection of nine dwellings (two affordable units) with associated existing access, parking, landscaping, drainage infrastructure and communal amenity space**

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 reviewed the Reptile Survey Report (Arun Ecology Ltd., August 2026) and Preliminary Ecological Appraisal (Arun Ecology Ltd., August 2026), relating to the likely impacts of development on designated sites, protected and Priority species and habitats and the 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 (Arun Ecology Ltd., August 2026), that there are no buildings on site. We understand that trees T074, T075 and T076 have Potential Roost Features for individual bats (PRFs-I) and will be removed for the development. Therefore, we highlight that appropriate compensation will be 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 also highlight that a non-licensed Precautionary Working Method Statement for bats will be required, which includes inspection of any 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).

The site lies approximately 12.4km northeast of The Mens Special Area of Conservation (SAC) (MAGIC maps) and therefore lies outside within the 12km Wider Conservation Area for this SAC. Therefore, a project level Habitats Regulations Assessment (HRA) will not be required.

We support the implementation of the non-licensed Precautionary Method Statement for Hazel Dormouse in Section 6.4.8 of the Preliminary Ecological Appraisal (Arun Ecology Ltd., August 2026). This is because a 14m strip of lowland mixed deciduous woodland containing Blackthorn, Bramble and Dog Rose, which comprises suitable habitat to support Hazel Dormouse, will be removed for the development. This should be secured by a condition of any consent and implemented in full.

We support the Reptile Mitigation Strategy in Section 8 of the Reptile Survey Report (Arun Ecology Ltd., August 2026) as there is a low population of Slow Worm on site. 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 mobile protected and Priority species (including Hedgehog, which is a threatened and Priority species) in Sections 6.4.1, 6.4.9 and 6.4.10 of the Preliminary Ecological Appraisal (Arun Ecology Ltd., August 2026). 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. 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.

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 Reptile Survey Report (Arun Ecology Ltd., August 2026) and Preliminary Ecological Appraisal (Arun Ecology Ltd., August 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, including bats, Hazel Dormouse, reptiles and mobile protected and Priority species.

We support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Ecological Appraisal (Arun Ecology Ltd., August 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 Reptile Survey Report (Arun Ecology Ltd., August 2026) and Preliminary Ecological Appraisal (Arun Ecology Ltd., August 2026) to secure net gains for biodiversity, 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) 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 Reptile Survey Report (Arun Ecology Ltd., August 2026) and Preliminary Ecological Appraisal (Arun Ecology Ltd., August 2026), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. This includes the non-licensed Precautionary Method Statement for Hazel Dormouse in Section 6.4.8 and the Precautionary Method Statement for mobile protected and Priority species in Sections 6.4.1, 6.4.9 and 6.4.10 of the Preliminary Ecological Appraisal (Arun Ecology Ltd., August 2026) and the Reptile Mitigation Strategy in Section 8 of the Reptile Survey Report (Arun Ecology Ltd., August 2026). This avoids impacts on European Protected Species and protected species.

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 ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY MEASURES LAYOUT

"A Biodiversity Measures Layout for the biodiversity measures listed in the Reptile Survey Report (Arun Ecology Ltd., August 2026) and Preliminary Ecological Appraisal (Arun Ecology Ltd., August 2026) 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).

3. 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 Hazel Dormouse 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 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)
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.

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.