



Date: 23 September 2026
Our ref: 22001

Matthew Porter
Horsham District Council
Parkside
Horsham
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RH12 1RL

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/26/0366
Location:	Land North West of Southwater RH13 9AW
Proposal:	"Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of up to 1,000 residential dwellings (including affordable housing) (Use Class C3); up to 80 specialist accommodation units (Use Class C2); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure"

Thank you for re-consulting Place Services on the above outline application.

No ecological objection	☐
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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 following documents relating to the likely impacts of development on designated sites, protected and Priority species and habitats and the identification of proportionate mitigation:

Main site and Christs Hospital site

- Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026)
- Technical Note Appendix C 2026 Wintering and Breeding Bird Survey Report (Hankinson Duckett Associates, May 2026)
- Technical Note Annex D Brown Hairstreak Survey Report (Hankinson Duckett Associates, May 2026)
- Environmental Statement Volume II, Appendix 8.2 UK Habitat Classification Survey and Target Notes – Main Site (Hankinson Duckett Associates, February 2026)
- Environmental Statement Vol II, Appendix 8.12 2025 Reptile Survey Report (Hankinson Duckett Associates, February 2026) Surveys undertaken September 2025.
- Environmental Statement Vol II, Appendix 8.9 2025 Water Vole and Otter Report (Hankinson Duckett Associates, February 2026) Surveys undertaken June and October 2025).
- Environmental Statement Vol II, Appendix 8.6 Botanical Survey Report (Hankinson Duckett Associates, February 2026) Surveys undertaken (Survey undertaken May 2019)
- Environmental Statement Vol II, Appendix 8.7 Bat Survey Report Rev A (Hankinson Duckett Associates, February 2026) Surveys undertaken June 2021 and May and July 2022.
- Environmental Statement Vol II, Appendix 8.11 Wintering and Breeding Bird Assessment (Hankinson Duckett Associates, February 2026) Surveys undertaken between November 2021 and June 2022.
- Environmental Statement Vol II, Appendix 8.15a Invertebrate Survey Report (Ecological Survey and Assessment, February 2026) Surveys undertaken summer 2021 and spring 2022.

- Environmental Statement Vol II, Appendix 8.15b Aquatic Invertebrates Survey Report (Ecological Survey and Assessment, February 2026) Surveys undertaken summer 2021 and spring 2022.

Main site only

- Environmental Statement Vol II, Appendix 8.8 2025 Dormouse Report (Hankinson Duckett Associates, February 2026) Surveys undertaken April, June, August, September and November 2025).

Christs Hospital site only

- Environmental Statement Vol II, Appendix 8.13 Christs Hospital 2025 Reptile Survey Report (Hankinson Duckett Associates, February 2026)
- Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal – Christs Hospital (Hankinson Duckett Associates, January 2026),

We have now also reviewed the Bat Survey Report (hda, August 2026) and additionally, we attended a meeting to discuss the survey efforts on 19th August 2026.

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

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

European Protected Species: bats

We previously highlighted that the Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026) that structure B5 (bridge under footpath) and B11 (single-storey milking room) have low bat roost potential: Therefore, if these structures are being removed, a further single emergence survey will be required in accordance with Table 7.2 of the 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023). The Bat Survey Report (hda, August 2026) has now undertaken the further surveys, and no roosting bats or evidence of roosting bats was identified. We are satisfied no further survey effort is required.

We note from the Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026) that a licence for roosting bats will be required before commencement of any works and recommend that a copy of this is secured by a condition of any consent. This is because surveys undertaken in March 2026 confirmed that Building B12 (T-shaped cow shed) has a bat roost for Common Pipistrelle and Soprano Pipistrelle and tree T59 (Oak) has a confirmed bat roost. We highlight should the LPA be minded to grant permission, a European Protected Species Licence copy will need to be submitted as proof and this can be secured by a condition of any consent. The licence will secure appropriate method of works.

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.

Additionally, we previously listed multiple trees which are classified as PRF-M and are proposed for removal. These have now been subject to the required three aerial climbing inspections, and none were found to currently possess any roosting bats. We are therefore now satisfied that there is sufficient evidence to proceed without a European Protected Species Mitigation Licence with regard to trees. However, as will be required for trees classified as PRF-I, any loss of roost resources which have been subject to the appropriate level of survey effort, then 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). This will need to be secured by a condition of any consent.

The main site lies approximately 11.2km east and the Christs Hospital site approximately 11.3km east of The Mens Special Area of Conservation (SAC). Therefore, both of these sites are within the 12km Wider Conservation Area for the 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 bat, which is the qualifying feature of the SAC. This species was recorded at various locations on site during April, May, June, August and October 2025 (Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026)). In addition, there is one record for this species within 2km of the site, approximately 1.5km northwest from 2014 (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 149 records of bats within 2km of the site, including Daubenton's, Whiskered, Natterers, Noctule, Brown Long-eared and Soprano and Common Pipistrelle (SxBRC). Four European Protected Species Mitigation Licences have been granted within 2km of the site: a) 1.3km to the north for Brown Long-eared bat and Common Pipistrelle in 2017; b) 1.5km to the north for Brown Long-eared bat and Common Pipistrelle 2015; c) 1.7km to the northeast for Common Pipistrelle and Soprano Pipistrelle 2015; and d) 1.9km to the west for Brown Long-eared and Common Pipistrelle in 2015 ([MAGIC maps](#)).

As there is a potential for habitat fragmentation 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).

The main site lies approximately 16.1km east of Ebernoe Common SAC and therefore lies outside the 12km Wider Conservation Area for this SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The main site lies approximately 12.7km northeast of Arun Valley SAC, SPA and Ramsar site.

In general terms, we support the recommendations in the Technical Note Appendix B 2026 Bat Survey Report (Hankinson Duckett Associates, June 2026) to retain and enhance existing hedgerows and treelines for foraging and commuting bats, to create new wetland habitats and to implement a long-term management strategy to maintain high quality habitats, particularly as the rare Barbastelle bat has been recorded on site.

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, with mitigation, that there will be no Adverse Effect on Integrity of the bat SAC. We advise the LPA to prepare a project level HRA Appropriate Assessment to record its decision and consult Natural England on the conclusion.

Hazel Dormouse

We note from the Environmental Statement Vol II, Appendix 8.8 2025 Dormouse Report (Hankinson Duckett Associates, February 2026) that the surveys undertaken in April, June, August, September and November 2025 on the main site concluded that Hazel Dormouse is likely absent from the site. However, as there are local records for the species and there is

suitable habitat onsite, we support the recommendations in Section 5.2 of the Environmental Statement Vol II, Appendix 8.8 2025 Dormouse Report (Hankinson Duckett Associates, February 2026), which need to be secured by a condition of any consent and implemented in full.

We support the non-licensed Precautionary Method Statement for Hazel Dormouse in Section 8.4.2 of the Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal – Christs Hospital (Hankinson Duckett Associates, January 2026) for the Christs Hospital site. This needs to be secured by a condition of any consent and implemented in full.

Reptiles

We note from the Environmental Statement Vol II, Appendix 8.12 2025 Reptile Survey Report (Hankinson Duckett Associates, February 2026) that the seven surveys for reptiles undertaken in September 2025 concluded that the site supports low numbers of Common Lizard and Grass Snake. Therefore, we support the Precautionary Method Statement for reptiles in the Environmental Statement Vol II, Appendix 8.12 2025 Reptile Survey Report (Hankinson Duckett Associates, February 2026) which needs to be secured by a condition of any consent and implemented in full.

Otter and Water Vole

We understand from the Environmental Statement Vol II, Appendix 8.9 2025 Water Vole and Otter Report (Hankinson Duckett Associates, February 2026) that surveys undertaken in June and October 2025 concluded that neither of these species are present on site. Therefore, we agree that no further surveys for Otter or Water Vole are required.

Breeding and Wintering Birds

We note from the Technical Note Annex C 2026 Wintering and Breeding Bird Survey Report (Hankinson Duckett Associates, May 2026) that no birds listed on Annex 1 of the EU Birds Directive or Schedule 1 of the 1981 Wildlife and Countryside Act (as amended) were recorded nesting on the site, although four Red-listed species (Greenfinch, House Sparrow, Linnet and Tree Sparrow) were recorded with territories on site. In addition, Skylark was recorded as using the site during the wintering bird survey only. As the development will result in the loss of open farmland and secondary woodland, we support the recommendations in Section 6 of the Technical Note Appendix C 2026 Wintering and Breeding Bird Survey Report (Hankinson Duckett Associates, May 2026).

Invertebrate species

We welcome the submission of Technical Note Annex D Brown Hairstreak Survey Report (Hankinson Duckett Associates, May 2026) which confirms that surveys in December 2025 recorded Brown Hairstreak butterfly eggs on all areas of the Blackthorn scrub and species-rich hedgerows sampled. We therefore support the recommendations in Section 5 of Technical Note Annex D Brown Hairstreak Survey Report (Hankinson Duckett Associates,

May 2026) to retain and enhance existing hedgerows and to plant new scrub and meadow grassland to benefit this species. This needs to be secured by a condition of any consent.

Irreplaceable habitats

We support the grassland management measures in the Environmental Statement Vol II, Appendix 8.6 Botanical Survey Report (Hankinson Duckett Associates, February 2026) for the Christs Hospital site and the main site.

We also support the recommendation in the Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal – Christs Hospital (Hankinson Duckett Associates, January 2026) for the implementation of a 15m buffer between the areas of adjacent ancient woodland (irreplaceable habitat) and the development on the Christs Hospital site.

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.

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](#).

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 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 Environmental Statement Vol II, Appendix 8.4 2025 Ecological Appraisal – Christs Hospital (Hankinson Duckett Associates, January 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 each phase of RESERVED MATTERS: FURTHER SURVEYS FOR DEVELOPMENTS PHASED OVER A LONG PERIOD

“Where the approved development is to proceed in a series of four phases over several years, further supplementary ecological surveys for protected and Priority species (particularly bat, [REDACTED] and reptile) shall be undertaken to inform the preparation and implementation of corresponding phases of ecological measures. The supplementary surveys shall be of an appropriate type for the above species and survey methods shall follow national good practice guidelines.

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 OF ANY WORKS WHICH WILL IMPACT THE BREEDING / RESTING PLACE OF BATS: SUBMISSION OF A COPY OF EPS MITIGATION LICENCE OR EVIDENCE OF SITE REGISTRATION UNDER A BAT MITIGATION OR EARNED RECOGNITION CLASS LICENCE FOR BATS

“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. **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).

5. CONCURRENT WITH RESERVED MATTERS: 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 (Bats, Dormice and reptiles) 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.

6. CONCURRENT WITH RESERVED MATTERS: 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, 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 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).

7. **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.

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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.

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.