



Date: 24 September 2026
Our ref: 22236

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Parkside
Horsham
West Sussex
RH12 1RL

By email only: planning@horsham.gov.uk

CONTAINS SENSITIVE INFORMATION

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/25/2114
Location: Land at 519396 111237 Church Farm Walk Upper Beeding West Sussex
Proposal: "Erection of 4 No. detached dwellings with associated amenity space, car parking spaces, detached carports, access road and other associated infrastructure."

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	☐

Please refer to Horsham District Councils advice regarding Water Neutrality requirements following [Natural England's Withdrawal Statement \(31st October 2025\)](#).

Summary

We have previously reviewed (10th February 2026 and 17th June 2026) the Ecological Impact Assessment (The Ecology Co-op, December 2025) and Ecology Letter (The Ecology Co-op, December 2025) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures. We note that the Ecology Letter (The Ecology Co-op, December 2025) is an update walkover survey of the site undertaken in August 2025, following a Preliminary Ecological Appraisal in 2021 and reptile and bat activity surveys in 2022. Those reviews also included a review of the Ecology Addendum (The Ecology Co-Op, 4th June 2026), produced following queries raised in relation to The River Adur Water Meadows & Wyckham Wood Local Wildlife Site, Barbastelle Bat, Badger, Cetti's Warbler and Biodiversity Net Gain.

Please note that comments on mandatory biodiversity net gain are provided by Horsham District Council in-house.

We have now (24th September 2026) additionally reviewed the following:

- Sussex Wildlife Trust Consultation Response (9th February 2026)
- Ecology Letter (The Ecology Co-Op, 8th September 2026)
- Landscape Proposals (CSA Environmental, April 2024)

Following our previous two consultation responses the West Sussex Local Nature Recovery Strategy¹ (LNRS) was published on 24 June 2026. It is indicated that responsible authorities (including LPAs) must "have regard" to relevant local nature recovery strategies, as well as meet their enhanced biodiversity duties under the NERC Act 2006 (as amended), as per the requirements of the Environment Act 2021². There are eight Principles for nature recovery in the West Sussex LNRS and the LNRS includes eight broad habitat categories which are priorities for nature conservation.

We are still satisfied that there is sufficient ecological information available to support determination of this application. We have provided additional commentary to address West Sussex LNRS.

Non-statutory Designated Sites – Local Wildlife Sites

The site is within the boundary of the non-statutory designated site The River Adur Water Meadows & Wyckham Wood Local Wildlife Site (LWS). This was assessed within the original EclA, however, the applicant's ecologist has provided further detail regarding the

¹ <https://www.sussexnaturerecovery.org.uk/publications>

² <https://www.legislation.gov.uk/ukpga/2021/30/part/6/crossheading/local-nature-recovery-strategies>

assessment and the mitigation and compensations strategy. The ecological addendum states *“The application site does not include any of the habitats described within the citation. It is situated some 100m from the closest wet ditch and it is not situated near Wyckham Wood. The dry location of the site, up a slope from the closest riparian habitat, presently includes a mixture of bramble Rubus fruticosus scrub, ruderal habitat dominated by sow thistle Cirsium arvense, cow parsley Anthriscus sylvestris cleavers Galium aparine and common nettle Urtica dioica and some areas of tall grassland dominated by false oat grass Arrhenatherum elatius. Whilst the development would therefore result in a reduction in green space within the boundary of the Local Wildlife Site, it will not directly impact the habitats or species for which this site is designated. Within the appendix accompanying this addendum there is photographs supporting the current site habitat descriptions above.”*

The assessment has provided sufficient evidence to indicate the site itself does not include any habitats which would meet the LWS selection criteria, and there are sufficient proposed mitigation and compensation measures. As indicated within the submitted information a Construction Environmental Management Plan (CEMP): Biodiversity should be secured by a condition of any consent to ensure good practice construction methods are implemented. The soft landscaping measures, which includes compensation buffer planting will need to be secured.

Policy 25 of the Horsham District Planning Framework (HDPF) relates to District character and the natural environment, this policy seeks to protect important landscape features and natural assets, as well as supporting conservation and enhancement of biodiversity and ecological networks. Policy 31 of the HDPF relates to Green Infrastructure and Biodiversity. This policy also seeks to maintain and enhance biodiversity and green infrastructure.

Any loss to the non-statutory designated sites and impacts upon it are, therefore, material planning matters. As cited above, the applicant has provided their reasoning as to why this loss is considered acceptable and not likely to have a significant impact on the integrity of the local wildlife site. In terms of the HDPR Policies and the West Sussex LNRS which seek to protect and enhance ecological networks and biodiversity assets, any loss of habitat within a designated Local Wildlife Site is contrary to the objectives and priorities.

The LPA should determine in combination with all consultation responses whether they accept the above justification, including the proposed mitigation measures and buffer planting.

Bats

We are still satisfied with the information provided in relation to bats. An increase in artificial light would negatively impact foraging/ commuting bats. We recommend lighting details are outlined within a wildlife sensitive lighting scheme, in line with best practice guidance

As previously stated, we note from the Ecological Impact Assessment (The Ecology Co-op, December 2025) that there are no buildings onsite and it appears from the Arboricultural Impact Assessment (Arbortrack Systems Ltd., December 2025) that the only trees to be removed are G19 (Blackthorn) and Tree 18 (Elder). As neither of these would contain Potential Roost Features for bats, we agree that no further surveys for bats are required.

GN:08/23 from the Institute of Lighting Professionals³ and secured by a condition of any consent.

Badger

An updated site walkover was undertaken following reports of Badger activity. The addendum states no evidence of Badger sett making was observed on site or within the immediate vicinity. The mammal tracks and push throughs were suitably inspected. Precautionary mitigation measures to ensure no Badger are harmed during construction should be implanted within a CEMP: Biodiversity and secured by a condition of any consent. This should include details of escape ramps from trenches and covering any pits overnight.

Breeding Birds

The ecological addendum has provided further clarity regarding potential impacts upon Cetti Warbler. We are satisfied the information provided is sufficient and agree a CEMP: Biodiversity should be implemented during construction.

We understand from the Ecology Letter (The Ecology Co-op, December 2025) that dense bramble scrub had been removed between the two visits to the site in 2021 and that the remaining scrub had been recently flailed before the update walkover survey in August 2025.

Reptiles

As there are low populations of Grass Snake and Slow Worm onsite, we support the Precautionary Method Statement for reptiles in Section 5.4.2 of the Ecological Impact Assessment (The Ecology Co-op, December 2025). This should be secured by a condition of any consent and implemented in full.

We are 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](#).

³ <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

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, December 2025) and the Ecological Addendum Report (The Ecology Co-op, June 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, recommended in the Ecological Impact Assessment (The Ecology Co-op, December 2025) and 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 Ecological Impact Assessment (The Ecology Co-op, December 2025) and the Ecological Addendum Report (The Ecology Co-op, June 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. **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).

3. **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 in line with the recommendations of the Ecological Impact Assessment (The Ecology Co-op, December 2025), 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).

4. 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 appropriate lighting plans and technical specifications) 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 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.

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.

