



Date: 11 July 2025

Our ref: 03792

Meg Bayliss
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. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DC/25/0040
Location: Sir Roberts Farm Goose Green Lane Goose Green West Sussex
Proposal: Demolition of existing dwelling and erection of a replacement four-bed barn style dwelling with detached garage

Thank you for consulting Place Services on the above application.

No ecological objection	<input type="checkbox"/>
No ecological objection subject to attached conditions	<input checked="" type="checkbox"/>
Further information required/Temporary holding objection	<input type="checkbox"/>
Recommend Refusal	<input type="checkbox"/>
Subject to Natural England's formal comments on the conclusion of the Water Neutrality Appropriate Assessment	<input checked="" type="checkbox"/>
Subject to Natural England's formal comments on the conclusion of the Bat Appropriate Assessment (screening only)	<input checked="" type="checkbox"/>

Please note that following receipt of Natural England's position statement on developments in the Sussex North Water Supply Zone, decisions on planning

applications should await the completion of a Sussex North water neutrality strategy unless they can demonstrate water neutrality.

Summary

We have reviewed the Preliminary Ecological Appraisal (Phlorum Limited, July 2022) and the Bat Preliminary Roost Assessment (Arun Ecology, April 2025), supplied by the applicant, relating to the likely impacts of development on protected & Priority species and habitats, and identification of proportionate mitigation. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We note the updated Bat Preliminary Roost Assessment assessed the bungalow as having negligible bat roosting potential. Additionally, the document states the proposed replacement dwelling will not result in a significant increase in light pollution.

The site lies approximately 10.1km southeast of The Mens Special Area of Conservation (SAC) and 15.4km southeast of Ebernoe Common Special Area of Conservation (SAC). The site is therefore within the 12.0km Wider Conservation Area for the Mens SAC only, within which significant impacts or severance to flightlines must be considered as this is the full extent of the range of foraging area required by Barbastelle bat, the qualifying feature of the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol).

Two European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site, for Common Pipistrelle in 2017 approximately 1.7km northeast of the site and for Brown Long-eared Bat and Common Pipistrelle in 2022 approximately 1.6km southwest ([MAGIC](#) maps). There are approximately 37 records of bats within 2km of the site, including Soprano Pipistrelle, Whiskered Bat, Brown Long-eared, Daubenton's Bat, and other unidentified species (SBISx – accessed under licence). No Barbastelle records were returned. The site lies approximately 5.8km east of Arun Valley SAC, SPA and Ramsar site.

We understand that the proposed replacement dwelling will not require the removal the hedgerows but will require the removal of a small number of scattered trees which the Preliminary Roost Assessment assessed as negligible. Therefore, there will be no severance to the flight lines of foraging or commuting bats from the SAC and habitat connectivity within the site will be maintained.

The Bat Preliminary Roost Assessment (Arun Ecology, April 2025) states "*It will not include the removal of any bat flightlines or significantly increase the level of light pollution on any bat flight lines*" An increase in artificial light would negatively impact foraging bats. Any lighting should be in line with [best practice guidance GN:08/23 from the Institute of Lighting Professionals](#).

We therefore believe there will be no Adverse Effect on Integrity of the bat SAC. We advise the LPA to prepare a project level HRA Screening Report to record its decision and retain on file.

We are satisfied that there is sufficient ecological information available for determination. However, 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 and enhancement measures identified in the Preliminary Ecological Appraisal (Phlorum Limited, July 2022) and the Bat Preliminary Roost Assessment (Arun Ecology, April 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 bats.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended 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.

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

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

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 Preliminary Ecological Appraisal (Phlorum Limited, July 2022) and the Bat Preliminary Roost Assessment (Arun Ecology, April 2025) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

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. PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT LAYOUT

“A Biodiversity Enhancement Layout for biodiversity enhancements listed in xxx report shall be submitted to and approved in writing by the local planning authority.

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

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

The enhancement 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 paragraph 187d of the NPPF 2024 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)

Ecological Consultant

Place Services at Essex County Council

Email: PlaceServicesEcology@essex.gov.uk



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.