



Date: 11 April 2025

Our ref: 02245

Robert Hermitage  
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Parkside  
Horsham  
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RH12 1RL

By email only: Planning Department, [planning@horsham.gov.uk](mailto:planning@horsham.gov.uk)

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*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.*

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**Application:** DC/25/0169  
**Location:** Partridge Green: The Green Man Jolesfield Partridge Green West Sussex  
**Proposal:** Change of use of existing public house into No.3 residential units (1 x 1 bedroom and 2 x 2 bedroom dwellings)

Thank you for consulting Place Services on the above application.

Recommended Refusal	<input type="checkbox"/>
No ecological objections	<input type="checkbox"/>
Recommended Approval subject to attached conditions	<input type="checkbox"/>
Subject to Natural England's comments on the conclusion of the Water Neutrality AA	<input checked="" type="checkbox"/>
Subject to Natural England's comments on the conclusion of the bat AA	<input type="checkbox"/>
Further information required for European Protected Species (bats)	<input checked="" type="checkbox"/>
Recommended Discharge of condition	<input 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 submitted information. No information relating to the likely impacts of development on designated sites and protected and Priority species & habitats, and identification of appropriate mitigation measures has been supplied. 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. This is because further information is required for bats, as detailed below:

### **European Protected Species**

#### **Bats**

The proposals include the change of use of an existing public house, to three residential dwellings. Photographs show the building has a tiled roof and could possess features suitable for use by roosting bats, which could be directly and or indirectly impacted by the proposed change of use. As such we recommend a Preliminary Roost Assessment (PRA) of the building is undertaken by a suitably qualified ecologist to inform any required mitigation or the need for further bat surveys. The results of any further surveys would be required prior to determination. The PRA can be undertaken at any time of year. Additionally, if any trees will be impacted by the proposals, we recommend a Ground Level Tree Assessment (GLTA) is undertaken prior to determination.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, European Protected Species. These surveys are required prior to determination because Government Standing Advice indicates that you should “Survey for bats if the area includes buildings or other structures that bats tend to use or there are trees with features that bats tend to use nearby”.

The results of these surveys are 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 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).

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 look forward to working with the LPA and the applicant to receive the additional information required to 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)**

Ecological Consultant

Place Services at Essex County Council

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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.*