



Date: 20 October 2025

Our ref: 09338

Bethan Tinning
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/25/1394
Location: Sir Roberts Farm Goose Green Lane Goose Green West Sussex
RH20 2LW
Proposal: Demolition of existing dwelling and erection of a replacement three-bed dwelling with a detached garage with associated access and change of use of land from paddock to incidental residential curtilage.

Thank you for consulting Place Services on the above application.

No ecological harm/No objection	<input type="checkbox"/>
Requires further information on European Protected Species (bats)	<input checked="" type="checkbox"/>
Recommend grant permission subject to conditions	<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"/>

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 Bat Activity Survey Report V2 (Chicken Shed and the Cottage) (Phlorum Limited, July 2023) and Preliminary Ecological Appraisal Rev 2 (Chicken Shed) (Phlorum Limited, September 2022), 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 are not satisfied that there is sufficient ecological information on protected species/designated sites available for determination. This is because the ecological assessments (Bat Activity Survey Report V2 (Chicken Shed and the Cottage) (Phlorum Limited, July 2023) and Preliminary Ecological Appraisal Rev 2 (Chicken Shed) (Phlorum Limited, September 2022) are out of date to support the application, in line with CIEEM Guidance¹ and paragraph 6.2.1 of British Standard (BS) BS42020 'Biodiversity – Code of practice for planning and development 2013'. This is because the dusk emergence survey was undertaken in June 2023 and the initial site walkover was undertaken in May 2022. We also request clarification as to the identity of the building to be demolished.

In addition, the site lies approximately 9.7km southeast of The Mens Special Area of Conservation (SAC) and therefore lies within the 12.0km Wider Conservation Area for The Mens SAC, within which significant impacts or severance to flightlines must be considered (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The qualifying feature for the SAC is Barbastelle bat, and there are no records for this species within 2km of the site (Sussex Biodiversity Record Centre). There are approximately 42 other records for bats within 2km of the site, comprising Whiskered bat, Soprano Pipistrelle, Noctule and Brown Long-eared bat species (SxBRC). Three European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site: a) 1.7km to the northeast for Common Pipistrelle bat in 2017; b) 1.8km to the southwest for Brown Long-eared and Common Pipistrelle bat in 2016; and c) 1.9km to the southwest for Brown Long-eared bat in 2017 ([MAGIC maps](#)).

The site lies approximately 15.0km southeast of Ebernoe Common SAC and therefore lies outside the Wider Conservation Area for this SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 5.7km east of Arun Valley SAC, SPA and Ramsar Site.

Therefore, the LPA will need to prepare a project level Habitats Regulations Assessment (HRA) Appropriate Assessment to record its decision and consult Natural England on the conclusion.

As a result, we recommend that the applicant's ecologist provides an ecological addendum or an updated ecological report to support this application, which should require an additional site visit and may require updated desk study information. The ecologist will be required to provide appropriate justification, on:

- The validity of the initial report;

¹ CIEEM (2019) Advice note on the Lifespan of Ecological Reports and Surveys - <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey(s).

If additional impacts to protected species are identified as a result of the additional ecological assessment, then any necessary further surveys for protected species should also be provided prior to determination. This is necessary as the Government Circular 06/2005 identifies that the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Therefore, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed application, is established before planning permission is granted.

Therefore, this further information is required to provide the LPA with certainty of impacts on protected and priority species and enable it to demonstrate compliance with its statutory duties, as well as its biodiversity duty under s.40 NERC Act 2006 (as amended).

We also recommend that reasonable biodiversity enhancements for protected, Priority and threatened species should be identified and implemented 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 Strategy and should be secured by a condition of any consent.

We look forward to working with the LPA and the applicant to receive the additional information required to support a lawful decision and overcome our holding objection.

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](#).

Please do not hesitate to 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.