



Date: 1st July 2025

Our ref: 02245

Robert Hermitage
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/25/0169
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 re-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 Preliminary Bat Roost Assessment (Alex Rosenfield, June 2025), relating to the likely impacts of development on designated sites, protected and Priority species and habitats and the identification of proportionate mitigation. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

We are still 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

We understand from Section 8.8 of the Preliminary Bat Roost Assessment (Alex Rosenfield, June 2025) that the building provides moderate suitability for roosting bats and that there is potential for impact to bats without mitigation. Although we understand impacts to the roof are not foreseen, we request that justification is provided as to the reason why no provision has been made for mitigation measures for bats or we recommend that a Non-licensed Precautionary Method Statement for bats is submitted to the LPA prior to determination in accordance with [Government Standing Advice](#).

This justification or the details of the Non-licensed Precautionary Method Statement for bats is 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.

See Appeal Decisions Ref: APP/P1560/W/24/3344547 at The Oaks, Clacton Road Weeley Essex CO16 9EF and APP/W3520/W/17/3174638 Pooles Farm, Thorney Green Road, Stowupland IP14 4AJ, where the appeals were dismissed as one of the main issues was the effect of the proposal on protected species. The Inspector could not be sure that there would be no adverse effect on protected species in the absence of ecological information. We also highlight that this information is also requested by the Inspector even where ecology has not been a reason for refusal.

Additional comments

We note from the Preliminary Bat Roost Assessment (Alex Rosenfield, June 2025) that the two sheds have negligible bat roost potential. We also note from the Preliminary Bat Roost

Assessment (Alex Rosenfield, June 2025) that the trees onsite have negligible bat roost potential and from the Biodiversity Net Gain Assessment (Alex Rosenfield, January 2025) that the scattered trees will all be retained. We therefore agree that no further surveys are required for these buildings or for trees.

We support the Precautionary Method Statement for mobile protected species (including Hedgehog, which is a Priority and threatened species) in Section 8.17 of the Preliminary Bat Roost Assessment (Alex Rosenfield, June 2025). This needs to be secured by a condition of any consent and implemented in full.

We also support the proposed reasonable biodiversity enhancements, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 180d and 186d of the National Planning Policy Framework (December 2023). The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Layout and should be secured by a condition of any consent.

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 look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Hayley Dean MCIEEM MSc BSc (Hons)
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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.