

From: Laura Downs <Laura.Downs@naturespaceuk.com>
Sent: 04 June 2026 11:27:03 UTC+01:00
To: "Shazia Penne" <Shazia.Penne@horsham.gov.uk>
Subject: Re: P1882i DC/26/0388 - MOATFIELD FARM

Good morning Shazia,

Thank you for passing along the applicant's comments. I have reviewed this case again as well as the previous case referenced in the comments below (DC/23/2270). For this past application at Moatfield Farm, the scale of works was smaller, and plans did not appear to include the removal of suitable GCN habitat, hence the informative recommended within our previous comments.

However for this current application, pre and post development habitat maps demonstrate the loss of scrub and grassland habitat which provide terrestrial opportunities for GCN. The closest pond located less than 20m from the planned development has not been surveyed. It has returned a poor HSI, however this appears to be based on an assumption that the waterbody is stocked with fish which does not seem to be confirmed. There are also a number of other waterbodies surrounding the site, and the site is located within the red impact risk zone, which indicates a presence of highly suitable habitat and a high likelihood of great crested newt presence.

We do agree however that due to the scale of the habitat removal and of the overall development, that a reasonable avoidance measures statement may be suitable, and would recommend that the measures laid out within the applicant's PEA (which specifically include ecological supervision, staged clearance and stopping works should a GCN be found), are secured via condition.

As stated above, we do believe that there is a risk associated with this approach, and therefore if the applicant wishes to completely avoid any risks relating to great crested newts, they have the option to enquire for Horsham District Council's District Licence, which provides full legal cover for any impacts to great crested newts and therefore removes the risk of having to stop works if great crested newts are found on site. More details on the District Licensing Scheme operated by the council can be found at www.naturespaceuk.com.

Best wishes,

Laura Downs (*she/her*)
District Licensing Officer (Great Crested Newts) – West Sussex

NatureSpace Partnership

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Company operating hours: Monday to Thursday 09:00 - 17:00



From: Shazia Penne <Shazia.Penne@horsham.gov.uk>

Sent: 27 May 2026 10:54

To: Laura Downs <Laura.Downs@naturespaceuk.com>

Subject: FW: P1882i DC/26/0388 - MOATFIELD FARM

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Hi Laura

Please see below response from the agent.

Kindly advise.

Shazia Penn

e

Planning Officer

Telephone: 01403 21525

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Email: Shazia.Penne@horsham.gov.uk

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Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB

Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton

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From: Paul Carnell <PCarnell@eceplanning.com>

Sent: 27 May 2026 10:45

To: Shazia Penne <Shazia.Penne@horsham.gov.uk>

Subject: P1882i DC/26/0388 - MOATFIELD FARM

Hi Shazia,

Thank you for sending through this further response. Our PEA is clear on the potential for GCN following a thorough site visit undertaken by a qualified ecologist which considers the likelihood of GCN presence to be Low. In these circumstances a site-specific precautionary working method statement is proportionate. I presume the Nature Space officer has not made a site visit and is making this request from a review on google earth and a few photographs. Indeed, our approach mirrors that recommended by Nature Space in 2024 for another application at Moatfield Farm located in close proximity with a waterbody – see attached.

The potential costs for the applicant to either instruct the surveys of nearby waterbodies or seek a nature space licence are potentially significant and are not proportionate to the level of risk as identified in the PEA. To my mind, the request for the additional information above that already provided and proposed is unreasonable in the context of the previous approach taken by Nature Space to development proposals at Moatfield Farm.

We are in discussions with our ecologist at the moment, but I would ask for a re-evaluation of this request given the risk profile here is demonstrably low, and has been accepted as such within the recent past.

Kind Regards,

Paul Carnell

Associate Planner, MRTPI

T 01903 248777 | M 07383 266 457

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From: Shazia Penne <Shazia.Penne@horsham.gov.uk>

Sent: Thursday, May 21, 2026 8:18 AM

To: Paul Carnell <PCarnell@eceplanning.com>

Subject: RE: DC/26/0388 - MOATFIELD FARM

Dear Paul

I received the below comments from Nature Space –

Thank you for sending those over. I have reviewed them alongside the applicant's PEA and would like to request some further information. The applicant's ecological report states that:

- "Habitats on site are of low ecological quality, typical of a working farm courtyard dominated by hardstanding, bare ground and scattered scrub, with higher-quality habitat limited to the native boundary hedgerow and semi-mature trees."
- "Great crested newts: No aquatic habitat is present on site, and terrestrial habitat is limited and largely sub-optimal. However, the site lies within a NatureSpace Red Impact Risk Zone, with confirmed GCN records approximately 1.8 km to the north-east and two off-site ponds (Waterbodies 4 and 5) of average to good suitability"
- "It is recognised that several waterbodies within 500 m of the site display moderate to good suitability for great crested newt (GCN). However, given the nature of the intervening habitat and the limited suitability of the site itself, desk-based biological records are not considered essential at this stage"
- "A precautionary approach is proposed, noting that the Local Planning Authority can request updated survey information during determination"

The above report has determined that there is a lack of suitable habitat on site and therefore no significant opportunity for GCN. However, site photos demonstrate that there is a significant amount of vegetation surrounding and encroaching upon building 2 which is due to be demolished and located only 20m away from the nearest waterbody. Additionally the hardstanding present on site has been described as eroded, cracked and overgrown in some areas, which may provide sheltering opportunities for GCN. It is also believed that there is connectivity between the woodland ponds and the site. It is anticipated that should GCN be present within the nearby waterbodies, they are likely using onsite habitat and therefore there is a risk associated with undertaking works under avoidance measures.

In line with Natural England Standing advice, we do not consider that the survey effort has been robust enough in this case when considering the proximity and quality of the nearby waterbodies and the presence of suitable habitat onsite. The applicant therefore has the following options:

- Submit a NatureSpace Report or Certificate to demonstrate that the impacts of the proposed development can be addressed through Mid Sussex District Council's District Licence. This method of licensing often removes the need for survey work and onsite mitigation for great crested newts as it provides compensation habitats off site. (more details can be found at www.naturespaceuk.com); or
- Provide further information (assessment on nearby ponds), in line with Natural England's Standing Advice, to rule out impacts to great crested newts*, or demonstrate how any impacts can be addressed through appropriate mitigation/compensation proposals**; or

-If through further survey work it is determined that there is no suitable habitat impacted on site and the likelihood of great crested newts is very low, then a precautionary working statement in the form of Reasonable Avoidance Measures (RAMs)/Non-Licensed Method Statement (NLMS) strategy documents completed by a suitably qualified ecologist may be acceptable for the development.

*i.e., to show that any ponds within 500m are not suitable for great crested newts and/or show how any potential impacts can be avoided.

*To do so, surveys to determine presence/likely absence and population size class assessments may need to be undertaken by a suitably qualified ecologist in accordance with Natural England's Standing (Great crested newts: advice for making planning decisions – GOV.UK) (and if using eDNA surveys, the Great Crested Newt Environmental eDNA Technical Advice Note (Natural England 2014)). If GCN are identified, appropriate mitigation and compensatory measures will need to be identified to satisfy planning requirements and a site-based mitigation licence may be required. Surveys are seasonally constrained.

Please review and provide the information requested.

Kind Regards

Shazia Penn

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Planning Officer

Telephone: 01403 21525

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Email: Shazia.Penne@horsham.gov.uk



Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB

Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton

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From: Paul Carnell <PCarnell@eceplanning.com>

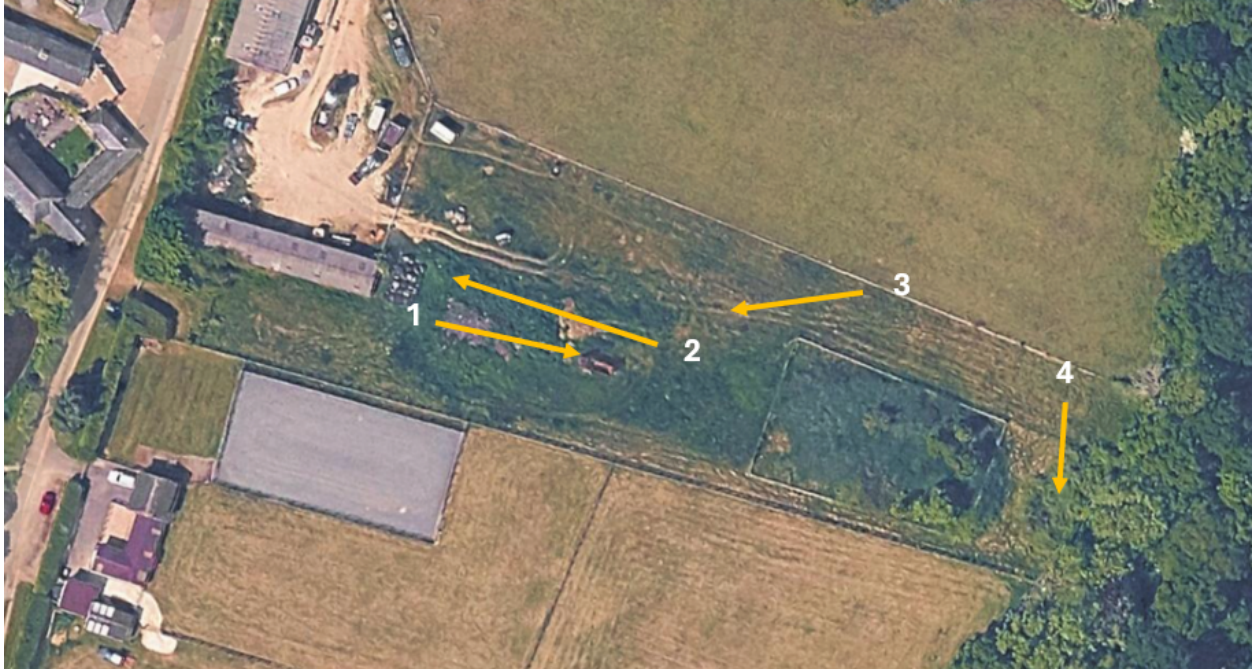
Sent: 20 May 2026 11:12

To: Shazia Penne <Shazia.Penne@horsham.gov.uk>

Subject: RE: DC/26/0388 - MOATFIELD FARM

Hi Shazia,

As requested, please find attached 3 photographs taken of the pond and a few images of the area east of the southern barn (numbered 1 – 4 as per the below) as requested by Nature Space.



In terms of the request for an Extension of time, we can agree provided you are able to confirm that there are no other outstanding matters which would require any additional extension of time beyond 5th June.

Please let me know if you need anything further,

Kind Regards,

Paul Carnell

Associate Planner, MRTPI

T 01903 248777 | M 07383 266 457

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Sussex studio 64-68 Brighton Road, Worthing, BN11 2EN

From: Shazia Penne Shazia.Penne@horsham.gov.uk

Sent: Monday, May 11, 2026 10:45 AM

To: Paul Carnell PCarnell@eceplanning.com

Subject: DC/26/0388 - MOATFIELD FARM

Hi Paul

I was reviewing the details of this application and had noticed that Nature Space had commented below, would it be possible to provide the requested details:

Thank you for consulting us on the above application, I have reviewed the applicant's PEA and would like to request some further information in regard to GCN. There are some photos included within the end of the report however these are fairly limited. Photos 2 and 3 show that there is some extensive suitable GCN habitat surrounding the southern barn. As this building is to be completely removed, it is assumed therefore that this habitat will be impacted (as shown in post development habitat map), and as it sits within 20m of an unsurveyed pond it is considered there could be a risk here. This pond (P1) has been ruled out from consideration due to fowl presence and steep sides, would it please be possible to have some photos of this pond?

Additionally, I was wondering if there are any photos available of this area of habitat (see screenshot below) as it does seem to provide some connectivity between the site/southern barn, and the woodland where P4 and P5 are located? If there are any other photos available of surrounding habitat and onsite then this would always be helpful also



Thank you.

Shazia Penn

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Planning Officer

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