15th August 2024

Meg Bayliss
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

By email only

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/24/1046**
Location: **Warren Lodge Heather Way Storrington Pulborough West Sussex RH20 4DD**
Proposal: **Erection of a single storey side extension.**

Dear Meg,

Thank you for consulting Place Services on the above application.

a) No ecological harm/No objection	
b) Requires further information on European Protected Species	
c) Recommend grant permission subject to conditions	Yes
d) Recommend refusal	
e) Subject to Natural England's formal comments on the conclusion of the Water Neutrality Appropriate Assessment	
f) Subject to Natural England's formal comments on the conclusion of the Bat Appropriate Assessment	
g) Discharge of condition	

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.

Summary

We have reviewed the submitted documents for this application, including the Phase 1 Bat Survey Report (Batscan Ltd, May 2024), relating to the likely impacts of development on protected & Priority species and identification of proportionate mitigation.

We note from the Phase 1 Bat Survey Report (Batscan Ltd, May 2024) states the following:
"5.1 No bats, evidence of bats or significant potential for bat use were found in the section of this building which will be affected by the proposed works – or elsewhere in the structure. It is therefore concluded that the tiled roof of the porch/lobby, at the south-east corner of the house, has a virtually negligible potential for bat use. Therefore, no further surveys will be required, prior to the proposed works."

As a result, we therefore agree that no further surveys for bats are required. However, we note that the Phase 1 Bat Survey Report (Batscan Ltd, May 2024) recommends that the tiles are removed by hand with consideration for bats. In addition, a written copy of a toolbox talk has apparently been included as part of this report. However, we can not see any evidence of this being provided. As a result, we recommend that a Bat Method Statement is included as a condition of any consent, to set out the precautionary measures during the construction phase.

The site lies approximately 10.3km southeast of The Mens Special Area of Conservation (SAC) and approximately 16km southeast of Ebernoe Common SAC. The site therefore does not falls within the 6.5km Key Conservation Area for The Mens SAC, but is within the 12m Wider Conservation Area for Ebernoe Common SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). One of the qualifying features for the SACs is Barbastelle bat and there are records for this species within 2km of the site (Sussex Biodiversity Record Centre (SxBRC) - accessed under licence) and MAGIC maps.

There are records of bats within 2km of the site, including Common Pipistrelle, Soprano Pipistrelle, Brown Long-eared, Noctule, Serotine, Natterer's, Barbastelle bat (SxBRC - accessed under licence). In addition, there four record of European Protected Species Mitigation Licence (EPSML) being granted (MAGIC maps). These include two breeding roosts, one of which were Common pipistrelle, Brown long-eared bat, Brandt's bat, Whiskered bat, and Barbastelle were recorded and one relating to Soprano pipistrelle. Both of these licences dated from 2015. The two non-breeding roosts dated from between 2013 and 2015 and related to Common pipistrelle, Brown long-eared bat, Serotine, Whiskered bat, Daubenton's bat and Natterer's bat.

The site comprises of buildings, surrounded by gardens and woodland to the north--east, residential housing and a treeline to the south and woodland to the east. As no trees will be removed during the development, 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. No lighting is also proposed which could cause indirect impacts upon foraging and commuting bats and a a timer operated black out blind is propsoed on the proposed garden room roof window.

We therefore believe that there will therefore be no Adverse Effect on Integrity of the bat SAC. We advise the LPA to prepare a project level HRA screening report to support a lawful decision..

We are satisfied that there is sufficient ecological information available for determination.

This provides certainty for the LPA of the likely impacts on protected and Priority species and, with finalised mitigation measures secured via a bat method statement, the development can be made acceptable.

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

It is highlighted that we have been instructed to leave comments on Great crested newt to the NatureSpace Partnership. Please note that also we do not provide comments on mandatory biodiversity net gain as these will be provided by Horsham District Council in-house.

We also support the proposed reasonable biodiversity enhancements, which include bat boxes, 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.

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. **PRIOR TO COMMENCEMENT: BAT METHOD STATEMENT**
   "A Bat Method Statement shall be submitted to and approved in writing by the local planning authority, in line with the Phase 1 Bat Survey Report (Batscan Ltd, May 2024). This will contain precautionary mitigation measures and/or works to reduce potential impacts to bats during the construction phase and will include a written copy of a 'toolbox talk'.

   The measures and/works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter."

   Reason*:* To conserve and enhance 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) and Policy 31 of the Horsham Development Framework.

2. **PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY**
   "A Biodiversity Enhancement Strategy for protected and Priority species prepared by a suitably qualified ecologist shall be submitted to and approved in writing by the local planning authority.

   The content of the Biodiversity Enhancement Strategy shall include the following:
   - *a) Purpose and conservation objectives for the proposed enhancement measures;*
   - *b) detailed designs or product descriptions to achieve stated objectives;*
   - *c) locations, orientations and heights of proposed enhancement measures by appropriate maps and plans (where relevant);*
   - *d) persons responsible for implementing the enhancement measures; and*
   - *e) details of initial aftercare and long-term maintenance (where relevant).*

The works shall be implemented in accordance with the approved details shall be retained in that manner thereafter."

Reason: To enhance protected and Priority species & habitats and allow the LPA to discharge its duties under the NPPF 2023 and s40 of the NERC Act 2006 (as amended).

Please contact us with any queries.

Yours sincerely

Hamish Jackson ACIEEM 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.