Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
www.placeservices.co.uk

Date: 24 September 2025 Our ref: 08392

Sam Whitehouse
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

By email only: Planning Department, 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/25/1141
**Location:** Barclays Bank Ltd 84 High Street Billingshurst West Sussex RH14 9QS
**Proposal:** Change of Use and external alterations to provide 1no. retail/commercial unit and 6no. 1 bedroom flats.

Thank you for consulting Place Services on the above application.

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|---|---|
| **No ecological objection** | ☐ |
| **Recommend approval subject to attached conditions** | ☐ |
| **Further information required/Temporary holding objection.<br>Insufficient Ecological Information on:<br>European Protected Species (bats)** | ☒ |
| **Recommend Refusal** | ☐ |
| **Subject to Natural England's comments on the conclusion of the Water Neutrality AA** | ☒ |
| **Subject to Natural England's comments on the conclusion of the bat AA** | ☒ |

**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 documents supplied by the applicant, relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation. Unfortunately, no information has been submitted in relation to ecology. 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 available for determination of this application. We recommend that further information on protected species is provided prior to determination. The reasons for this are outlined below:

**European Protected Species - bats**

We understand from the Planning, Design & Heritage Statement (Allen Planning Ltd., July 2025) that the development includes the installation of new roof lights and therefore there may be impacts to bats. Government Standing Advice says you should ask for a survey if:

- distribution and historical records suggest bats may be present
- the development site includes or is close to any built structures, on or underground, that provide commuting, foraging or roosting opportunities for bats

In addition, the site lies approximately 4.7km east of The Mens Special Area of Conservation (SAC) and therefore lies within the 6.5km Key Conservation Area for The Mens SAC, for which significant impacts or severance to flightlines must be considered (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site also lies approximately 10.1km east of Ebernoe Common SAC and therefore lies within the Wider Conservation Area for this SAC for 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 SACs is Barbastelle bat, and there are no records for this species within 2km of the site (Sussex Biodiversity Record Centre). There are approximately 61 other records for bats within 2km of the site, comprising Serotine, Brandts, Noctule, Common Pipistrelle and Brown Long-eared Bat species (SxBRC). One European Protected Species Mitigation Licence (EPSML) has been granted within 2km of the site: 1.89km to the west for Common Pipistrelle, Soprano Pipistrelle and Whiskered bat in 2016 (MAGIC maps). The site lies approximately 8.3km northeast 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.

The survey information 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.

**Additional comments**
We understand from the Application Form that there are no trees on site and therefore a Ground Level Tree Assessment for bats is not required.

If external lighting is required, we recommend that a Wildlife Friendly Lighting Strategy is implemented for this application to avoid impacts from light disturbance. This needs to be secured by a condition of any consent and implemented in full.

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 need to be outlined within a separate Biodiversity Enhancement Strategy and secured by a condition of any consent.

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 support a lawful decision and 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)**
**Senior Ecological Consultant**
Place Services at Essex County Council
Email: PlaceServicesEcology@essex.gov.uk

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.*

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