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

Date: 26 November 2025 Our ref: 11410

Tamara Dale
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/25/1153
Location: Palaceland Farm Hooklands Lane Shipley West Sussex RH13 8PX
Proposal: Demolition of existing agricultural barn and construction of a holiday let accommodation (Class C1). Following previous extant approval DC/23/0589.

Dear Tamara

Thank you for re-consulting Place Services on the above application.

No ecological objection	☐
Recommend approval subject to attached conditions	☐
Further information required/Temporary holding objection • **Requires further information on European Protected Species (bats)**	☒
Recommend Refusal	☐

Please refer to Horsham District Councils advice regarding Water Neutrality requirements following Natural England's Withdrawal Statement (31st October 2025).

Summary

We have reviewed the Ecological Walkover Survey (Arbtech Consulting Ltd., October 2025), Bat Survey Report (Batscan Ltd., August 2023) and Preliminary Ecological Appraisal and Preliminary Roost Assessment Survey (Arbtech Consultancy Ltd., October 2019), relating to the likely impacts of development on designated sites, protected and Priority species & habitats and appropriate mitigation measures. Please note that comments on mandatory Biodiversity Net Gain are provided by Horsham District Council in-house.

We are not satisfied that there is sufficient ecological information available for determination of this application and recommend that further information for bats is provided prior to determination. The reasons for this are outlined below:

European Protected Species - bats

We note that the Ecological Walkover Survey (Arbtech Consulting Ltd., October 2025) confirmed that Building B1 (agricultural barn) has a low value for roosting bats and the combined Phase 1 bat survey (daytime building inspection) and Phase 2 survey (dusk emergence check) of the derelict barn undertaken in August 2023 identified a day roost by a single Common Pipistrelle bat (Bat Survey Report (Batscan Ltd., August 2023). We understand that the barn is open on all sides and in a significantly worse condition than when surveyed previously (Ecological Walkover Survey (Arbtech Consulting Ltd., October 2025). Therefore, we agree that further bat emergence or re-entry surveys to ascertain the roost type is required between May and September in accordance with Government Standing Advice.

The additional information for bats is required prior to determination because paragraph 99 of 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 required to provide the LPA with certainty of 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.

This further information is therefore required to provide the LPA with certainty of impacts on legally protected species and enable it to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006 (as amended).

Additional comments

The site lies approximately 10.4 km southeast of The Mens Special Area of Conservation (SAC) and therefore lies within the 12.0km Wider Conservation Area for the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The qualifying feature for the SAC is Barbastelle bat and there is one record of this species within 2km of the site, approximately 1.1 km to the east (Sussex Biodiversity Records Centre (SxBIS) - accessed under licence and MAGIC maps).

One European Protected Species Mitigation Licence (EPSML) has been granted within 2km of the site: 1.6km south of the site for Common Pipistrelle in 2017 (MAGIC maps). There are approximately 84 records of bats within 2km of the site, including Natterers, Common and Soprano Pipistrelle and Brown Long-eared Bat (SBISx – accessed under licence). The site lies approximately 15.4km southeast of Ebernoe Common SAC and is therefore outside the Wider Conservation Area for this SAC. The site lies approximately 7.1km 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.

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.

We look forward to working with the LPA and the applicant to receive the additional information required to 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 contact us with any queries.

Yours sincerely

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.