Place Services
Essex County Council
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www.placeservices.co.uk

Date: 17 November 2026 Our ref:24056

Bethan Tinning
Horsham District Council
Parkside
Horsham
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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.

Application: **DC/26/0781**
Location: **3 Station Road Billingshurst West Sussex RH14 9RF**
Proposal: **Erection of a new dwelling.**

Thank you for consulting Place Services on the above application.

No ecological objection	☐
No ecological objection subject to attached conditions	☐
Further information required/Temporary holding objection: • **European Protected Species (bats)** • **No ecological report**	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐

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 available for determination of this application and recommend that further information relating to bats is required to make this proposal acceptable prior to determination. The reason for this is outlined below:

European Protected Species: bats
It appears from the Tree Protection Plan Drawing No. 115/2026-4 (WPS Planning, submitted May 2026) and the Application Form that there are trees on site which will be removed. As this may impact roosting bats, a Ground Level Tree Assessment needs to be undertaken to assess any likely impact to roosting bats in accordance with the 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023) and inform any mitigation measures which may be required. We understand from the Planning Statement (WPS Planning, submitted October 2026) that the existing dwelling on site will be retained.

The site lies approximately 5.1km east of The Mens Special Area of Conservation (SAC) (MAGIC maps) and is therefore within the 6.5km Key Conservation Area for this SAC. Within this area all impacts must be assessed as habitats within this zone are considered critical for sustaining the populations of bats within the SACs (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The qualifying feature of the SAC is Barbastelle bat, but there are no records for this species within 2km of the site (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 51 records of bats within 2km of the site, including Serotine, Myotis species, Common Pipistrelle and Brown Long-eared (SxBRC). The site also lies approximately 10.1km east of Ebernoe Common Special Area of Conservation (SAC) and therefore lies inside the 12.0km Wider Conservation Area for this SAC. One European Protected Species Mitigation Licence has been granted within 2km of the site: a) for Common Pipistrelle, Soprano Pipistrelle and Whiskered bat at 1.9km west of the site in 2016 (MAGIC maps). The site lies approximately 8.2km north of Arun Valley SAC, SPA and Ramsar site.

Government Standing Advice for bats says you should ask for a survey if "*the development site includes or is close to trees*". We highlight that these assessments can be undertaken at any time of the year. To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats and protected species and habitats.

The information 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.

Furthermore, the Local Planning Authority, as a competent authority, should have regard to the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) when reaching planning decisions including the Favourable Conservation Status licensing test and must not leave this until the licence application stage. Therefore, if a European Protected Species Mitigation Licence is required for this application, appropriate mitigation measures to support the provision of the licence must also be outlined prior to determination to allow certainty to the LPA that a licence will likely be granted.

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

Additional comments

We also recommend that reasonable biodiversity measures for protected, Priority and threatened species should be identified by a suitably qualified ecologist and implemented to secure net gains for biodiversity, as outlined in the National Planning Policy Framework (August 2026) N2 Part F. Reasonable biodiversity measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Measures Strategy to be secured as 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

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.

We are unable to respond directly to applicants/agents or other interested parties. Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer at the relevant LPA, who will seek further advice from us where appropriate.

AI may have been used in the preparation of this response, but its use will be limited to basic proof-reading, grammar, and spelling correction. This response has been reviewed by the author(s). If you have any queries, please contact us for information about our AI guidance.