14th May 2025

Hannah Darley
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/25/0566**
Location: **Wood Reeves Mill Lane Lower Beeding West Sussex RH13 6PX**
Proposal: **Extensions and alterations to existing building to provide 'Fishery Managers' dwellinghouse.**

Dear Hannah,

Thank you for consulting Place Services on the above application.

Recommended Refusal	
No ecological objections	
Recommended Approval subject to attached conditions	
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	
Further information required on European Protected Species (bats)	Yes
Recommended 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 Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2024), relating to the likely impacts of development on designated sites, protected and Priority species & habitats, and identification of appropriate mitigation measures. 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 for bats is provided prior to determination. The reasons for this are outlined below:

European Protected Species - bats

We note from the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2024) that bat activity surveys, including walked transects and static monitoring, are recommended to record the usage of the site by foraging and commuting bats and to identify any bat roosts in the vicinity. This is 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 information

We note from the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2024) that Buildings B1 and B2 (both outbuildings) have negligible at bat roost potential. We therefore agree that no further surveys are required for bats and buildings.

As there is scrub and hedgerow on site and the site is surrounded by woodland, Hazel Dormouse may be present. However, as there are no records for this species within 2km of the site and no suitable habitats will be removed during works, we support the non-licensed Precautionary Method Statement for Hazel Dormouse in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2024). This needs to be secured by a condition of any consent and implemented in full.

No works will be undertaken within 8m of the watercourse, no riparian habitats will be lost and there are no records for Otter within 2km of the site (Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2024). However, as the works are close to the watercourse, we support the non-licensed Precautionary Method Statement for Otter in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2024). This needs to be secured by a condition of any consent and implemented in full.

Water Vole is protected under the Wildlife and Countryside Act 1981 (as amended), but as no works will be undertaken within 5m of the watercourse banks (Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2024), we support the Precautionary Method Statement for Water Vole in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2024). This needs to be secured by a condition of any consent and implemented in full.

As the site contains optimal habitat for reptiles, but no reptiles have been recorded within 2km of the site, and other mobile protected species may also be present onsite, including Hedgehog (which is a Priority and threatened species), we support the Precautionary Method Statement for reptiles and mobile protected species in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2024). This needs to be secured by a condition of any consent and implemented in full.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended 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 should be outlined within a separate Biodiversity Enhancement Layout and should be secured by a condition of any consent.

Please note that 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 recommend that the NatureSpace Partnership is consulted on this application.

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Please contact us with any queries.

Yours sincerely

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Ecological Consultant
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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.