



Date: 23 April 2026

Our ref: 15788

Tamara Dale
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

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/26/0253
Location: West Chilmington House Harbolets Road West Chilmington West Sussex RH20 2LG
Proposal: Demolition of the existing residential dwelling and erection of 5no. terraced houses (2no. 2 bed dwellings and 3no 3 bed dwellings).

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 • Protected and Priority species	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐

[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 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 details of survey results, mitigation and enhancement measures for bats and protected species are provided prior to determination. The reasons for this are outlined below:

European Protected Species: bats

We understand from the Planning, Design and Access Statement (submitted February 2026) that the existing dwelling will be demolished and therefore there may be impact to roosting bats. We recommend that a Preliminary Roost Assessment is undertaken and the results submitted to the LPA prior to determination. This assessment can be undertaken at any time of the year.

We highlight that if any trees will be removed for the application, then a Ground Level Tree Assessment for roosting bats will also be required.

In addition, the site lies approximately 8.1km east of The Mens Special Area of Conservation (SAC) and therefore lies within the 12km Wider 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 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 11 other records for bats within 2km of the site, comprising Whiskered, Common Pipistrelle and Brown Long-eared species (SxBRC). No European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site ([MAGIC maps](#)). The site lies approximately 13.1km southeast of Ebernoe Common and 5.2km northeast of Arun Valley SAC, SPA and Ramsar site.

Therefore, we request clarification as to whether there will be any impact to bats, including Barbastelle bats, from the development in accordance with [Government Standing Advice](#) which says that 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*
- *the development site includes or is close to [trees](#), shrubs, rock formations, quarries, natural cliff faces or water bodies that provide commuting, foraging or roosting opportunities for bats*

Protected and Priority species (including reptiles)

We also recommend that a Preliminary Ecological Appraisal should be undertaken in order to assess any impacts to Priority species, including reptiles. Hedgerows can provide suitable habitat for reptiles and other mobile protected species (such as Hedgehog) and it is not clear from the submitted documents if hedgerows will be removed as part of the development. This

is in accordance with [Government Standing Advice](#), which says you should ask for a survey if:

- *distribution and historical records suggest reptiles may be present*
- *the development proposal is likely to lead to harm to individual reptiles or their habitats*
- *suitable habitat is present at the development site that could support reptiles*

The survey information for bats and additional information for protected species and Priority species 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 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 should be outlined within a separate Biodiversity Enhancement Strategy 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 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)

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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.
- 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.