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

Date: 14 August 2025 Our ref: 06673

Hannah Darley
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/25/0984
Location: Greenacres New Barn Lane Henfield West Sussex BN5 9SJ
Proposal: Demolition of 2no. existing storage buildings and erection of 3no. replacement single storage barns arranged in a courtyard. Construction of access track and balancing pond. Provision of 2no. parking spaces.

Thank you for consulting Place Services on the above application.

No ecological objection	☐
Recommend approval subject to attached conditions	☐
Further information required on European Protected Species (bats) and Protected species (reptiles)	☒
Recommend Refusal	☐
Subject to Natural England's comments on the conclusion of the Water Neutrality 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 unless they can demonstrate water neutrality.

Summary

We have reviewed the submitted information. No information relating to the likely impacts of development on designated sites and protected and Priority species & habitats, and identification of appropriate mitigation measures has been supplied. 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. This is because further information is required for bats, as detailed below:

European Protected Species

Bats

The proposals include the demolition of two buildings. Additionally, as indicated by Horsham District Council Arboricultural Consultant, it is not clear if any of the bordering trees will be impacted by the proposals. It is therefore not clear whether bats will be impacted by the proposals. As such we recommend a Preliminary Roost Assessment (PRA) of the buildings, and a Ground Level Tree Assessment (GLTA) of the trees are undertaken in line with industry good practice guidelines to inform any required mitigation or the need for further surveys. The results of the further surveys are required prior to determination. The PRA/ GLTA can be undertaken at any time of year.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, European Protected Species. These surveys are required prior to determination because Government Standing Advice indicates that you should "*Survey for bats if the area includes buildings or other structures that bats tend to use or there are trees with features that bats tend to use nearby*".

Protected Species

Reptiles

The site is surrounded by grassland, with surrounding areas of scrub and open grassland habitat, as shown on aerial imagery. The site could be suitable for use by reptiles. We note the proposals include ground works to create the proposed balancing pond, as well as demolition. As such we recommend a Preliminary Ecological Appraisal is undertaken to assess the sites suitability for use by protected species, specifically reptiles and recommend any mitigation measures/ need for further surveys if considered appropriate.

We note the Preliminary Ecological Appraisal can include the PRA/ GLTA as part of the assessment.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for reptiles, protected species. These surveys are required prior to determination because Government Standing Advice indicates that you should "*Survey for reptiles if suitable habitat is present at the development site that could support reptiles".*

The results of these surveys are 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 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).

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 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)
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.