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

Date: 10 September 2025 Our ref: 07659

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/25/1159
Location: Lodge Farmhouse Guildford Road Slinfold West Sussex RH13 0QZ
Proposal: Installation of 2no. units for overnight guest use with associated decking, footpaths, parking and turning area, and recycling/refuse storage. Minor landscaping of the site, planting of native species trees, hedgerows, shrubbery and enhanced modified grassland throughout the site.

Thank you for consulting Place Services on the above application.

No ecological objection	☐
Recommend approval subject to attached conditions	☐
Further information required/Temporary holding objection. Insufficient Ecological Information: • European Protected Species (bats)	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the Water Neutrality Appropriate Assessment	☒
Subject to Natural England's formal comments on the conclusion of the Bat Appropriate Assessment	☒

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 (Sylvatica Ecology Ltd., March 2024) relating to the likely impacts of development on designated sites, protected and Priority species and habitats and the identification of proportionate mitigation. 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 are required prior to determination. The reasons for this are outlined below:

European Protected Species – bats
We note from the Proposed Layout Plan Drawing Number 231102-01-02 (Glamitect, February 2024) that three trees will be removed. However, it does not appear from the Preliminary Ecological Appraisal (Sylvatica Ecology Ltd., March 2024) that these trees have been subject to a Ground Level Tree Assessment in accordance with the 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023) and Government Standing Advice. If the trees have Potential Roost Features for Individual Bats (PRF-Is), we highlight that appropriate compensation will be required in advance of works to avoid loss of roost resource (Reason and Wray (2023) *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1. Chartered Institute of Ecology and Environmental Management).* In addition, a non-licensed Precautionary Working Method Statement for bats will be required for any trees with PRF-Is, which includes inspection of any affected trees by endoscope on the day and felling under the supervision of a licensed bat ecologist, as required in Table 6.3 of 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023).

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*".

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.

See Appeal Decisions Ref: APP/P1560/W/24/3344547 at The Oaks, Clacton Road Weeley Essex CO16 9EF and APP/W3520/W/17/3174638 Pooles Farm, Thorney Green Road, Stowupland IP14 4AJ, where the appeals were dismissed as one of the main issues was the effect of the proposal on protected species. The Inspector could not be sure that there would be no adverse effect on protected species in the absence of ecological information. We also highlight that this information is also requested by the Inspector even where ecology has not been a reason for refusal.

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.

Additional Comments
We note from the Preliminary Ecological Appraisal (Sylvatica Ecology Ltd., March 2024) that the building on site has negligible bat roost potential and therefore agree that no further surveys for bats and buildings are required.

As the site lies adjacent to ancient woodland (which is irreplaceable habitat), we support the recommendation in Section 6.1 of the Preliminary Ecological Appraisal (Sylvatica Ecology Ltd., March 2024) that a 15m buffer should be maintained between the site and the ancient woodland in accordance with Government Standing Advice.

The site lies approximately 10.7km northeast of The Mens Special Area of Conservation (SAC) and therefore lies within the 12.0km Wider Conservation Area this SAC, within which significant impacts or severance to flightlines must be considered. This is because this is the full extent of the range of foraging area required by Barbastelle bat, the qualifying feature of the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). No Barbastelles records are present within two kilometres of the site. Two European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site: a) for Common Pipistrelle and Brown Long-eared bat in 2013 approximately 1.2km northeast of the site; and b) for Brown Long-eared bat, Common Pipistrelle, Nathusius Pipistrelle and Soprano Pipistrelle bat 1.9km southeast of the site (MAGIC maps). There are approximately 22 records of bats within 2km of the site, including Common and Soprano Pipistrelle and Brown Long-eared Bat (SBISx – accessed under licence). The site lies 14.4km northeast of Ebernoe Common Special Area of Conservation (SAC), and therefore outside the Wider Conservation Area for this SAC, and approximately 16.5km north of Arun Valley SAC, SPA and Ramsar site. The LPA will need to prepare a project level HRA Appropriate Assessment to record its decision and consult Natural England on the conclusion.

We support the Precautionary Method Statement for mobile protected species (including Hedgehog, which is a Priority and threatened species, in Section 6.6 of the Preliminary Ecological Appraisal (Sylvatica Ecology Ltd., March 2024)). This needs to be secured by a condition of any consent and implemented in full.

If external lighting is required, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Ecological Appraisal (Sylvatica Ecology Ltd., March 2024)) to avoid impacts from light disturbance. 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 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
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.