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

Date: 5 September 2025 Our ref: 07654

Tamara Dale
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/25/1153
Location: Palaceland Farm Hooklands Lane Shipley West Sussex RH13 8PX
Proposal: Demolition of existing agricultural barn and construction of a holiday let accommodation (Class C1). Following previous extant approval DC/23/0589.

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required/Temporary holding objection • **Requires further information on protected species and designated sites (out of date reports)**	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the Water Neutrality 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 unless they can demonstrate water neutrality.

Summary

We have reviewed the Bat Survey Report (Batscan Ltd., August 2023) and Preliminary Ecological Appraisal and Preliminary Roost Assessment Survey (Arbtech Consultancy Ltd., October 2019), relating to the likely impacts of development on designated sites, protected and Priority species & habitats and appropriate mitigation measures. Please note that comments on mandatory Biodiversity Net Gain are provided by Horsham District Council in-house.

We are not satisfied that there is sufficient ecological information on protected species/designated sites available for determination. This is because the ecological assessments (Bat Survey Report (Batscan Ltd., August 2023) and Preliminary Ecological Appraisal and Preliminary Roost Assessment Survey (Arbtech Consultancy Ltd., October 2019)) are out of date to support this application, in line with CIEEM Guidance[1] and paragraph 6.2.1 of British Standard (BS) BS42020 'Biodiversity – Code of practice for planning and development 2013'. This is because the combined Phase 1 bat survey (daytime building inspection) and Phase 2 survey (dusk emergence check) of the derelict barn was undertaken in August 2023 and a day roost by a single Common Pipistrelle bat was identified.

As a result, we recommend that the applicant's ecologist provides an ecological addendum or an updated ecological report to support this application, which should require an additional site visit and may require updated desk study information. The ecologist will be required to provide appropriate justification, on:

- The validity of the initial report;
- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey(s).

If additional impacts to protected species are identified as a result of the additional ecological assessment, then any necessary further surveys for protected species should also be provided prior to determination. This is necessary as the Government Circular 06/2005 identifies that the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Therefore, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed application, is established before planning permission is granted.

Therefore, this further information is required to provide the LPA with certainty of impacts on protected and priority species and enable it to demonstrate compliance with its statutory duties, as well as its biodiversity duty under s.40 NERC Act 2006 (as amended).

Additional comments

The site lies approximately 10.4 km southeast of The Mens Special Area of Conservation (SAC) and therefore lies within the 12.0km Wider Conservation Area for the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The qualifying feature for the SAC is Barbastelle bat, there is one record of this species within

[1] CIEEM (2019) Advice note on the Lifespan of Ecological Reports and Surveys - https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf

2km of the site, approximately 1.1 km east (Sussex Biodiversity Records Centre (SxBIS) - accessed under licence and MAGIC maps).

One European Protected Species Mitigation Licence (EPSML) has been granted within 2km of the site: 1.6km south of the site for Common Pipistrelle in 2017 (MAGIC maps). There are approximately 84 records of bats within 2km of the site, including Natterers, Common and Soprano Pipistrelle and Brown Long-eared Bat (SBISx – accessed under licence). The site lies approximately 15.4km southeast of Ebernoe Common SAC and is therefore outside the Wider Conservation Area for this SAC. The site lies approximately 7.1km northeast of Arun Valley SAC, SPA and Ramsar site.

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 needs to be outlined within a separate Biodiversity Enhancement Strategy and secured by a condition of any consent.

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

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.