Place Services
Essex County Council
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Date: 5 September 2025 Our ref: 07656

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Horsham District Council
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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/25/0989
Location: Nutbourne Place Farm Nutbourne Lane Nutbourne West Sussex RH20 2HF
Proposal: Erection of an agricultural storage barn and water tank.

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	☐
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 (screening only)	☒

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 Habitat Management and Monitoring Plan (South Downs Ecology, April 2025), 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 note from the Habitat Management and Monitoring Plan (South Downs Ecology, April 2025) that there are no buildings on the site and that no trees will be removed and therefore no surveys for bats are required. In addition, we note that the two lines of trees bordering the road, the majority of which are Poplar, will be retained.

The site lies approximately 5.6km southeast of The Mens Special Area of Conservation (SAC) and therefore lies within the 6km Key Conservation Area for this SAC, for which all impacts must be considered (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 11.0km southeast of Ebernoe Common SAC and therefore lies within the 12km Wider Conservation Area for this SAC. The qualifying feature for the SACs is Barbastelle bat and there are two records for this species, with the closest approximately 1.1 km southwest (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). Two European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site as follows: a) for Barbastelle, Brown Long-eared bat, Common Pipistrelle, Serotine and Soprano Pipistrelle bat approximately 1km to the east in 2017; and b) for Common Pipistrelle, Soprano Pipistrelle and Brown Long-eared bat approximately 1km to the east in 2010 (MAGIC maps). There are over 200 records of bats within 2km of the site, including Daubenton's, Natterers, Common Pipistrelle, Soprano Pipistrelle and Brown Long-eared (SBISx – accessed under licence). The site lies approximately 1.7km north of Arun Valley SAC, SPA and Ramsar site.

We understand from the submitted documents that the site of 0.13ha comprises a developed lane, artificial unvegetated, unsealed surface, 0.04ha of modified grassland, horticulture, vacant land and two lines of trees bordering the lane, which will be retained. Therefore, there will be no severance to the flight lines of foraging or commuting bats from the SAC and habitat connectivity within the site will be maintained.

If external lighting is required, we recommend that a sensitive lighting scheme is implemented for this application to mitigate against the increase in light measures following Bat Conservation Trust advice and The Institution of Lighting Professionals (Guidance Note:08/23 (Institute of Lighting Professionals).

We therefore believe there will be no Adverse Effect on Integrity of the bat SAC. We advise the LPA to prepare a project level HRA Screening Report to record its decision and retain on file.

As low numbers of reptiles are likely to use the site at times and the proposals include the removal of some suitable reptile habitat in the fruit cage (Habitat Management and Monitoring Plan (South Downs Ecology, April 2025), we recommend that a Precautionary Method

Statement for reptiles and mobile protected species (such as Hedgehog, which is a Priority and threatened species) is implemented for this application. This should be secured by a condition of any consent and implemented in full.

We are satisfied that there is sufficient ecological information available to support determination of this application. 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.

This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

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

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

Submission for approval and implementation of the details below should be a condition of any planning consent:

Recommended conditions

1. **PRIOR TO COMMENCEMENT: PRECAUTIONARY METHOD STATEMENT FOR REPTILES AND MOBILE PROTECTED SPECIES**
"*A Precautionary Method Statement for reptiles and mobile protected species shall be submitted to and approved in writing by the local planning authority. This will contain precautionary mitigation measures and/or works to reduce potential impacts to reptiles and mobile protected species during the construction phase.*

   The measures and/works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter."

   Reason: To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

2. **PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY**
"Prior to any works above slab level, a Biodiversity Enhancement Strategy for protected, Priority and threatened species, prepared by a suitably qualified

ecologist, shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Enhancement Strategy shall include the following:

a) Purpose and conservation objectives for the proposed enhancement measures;
b) detailed designs or product descriptions to achieve stated objectives;
c) locations of proposed enhancement measures by appropriate maps and plans (where relevant);
d) persons responsible for implementing the enhancement measures; and
e) details of initial aftercare and long-term maintenance (where relevant).

The works shall be implemented in accordance with the approved details shall be retained in that manner thereafter."

Reason: To enhance protected, Priority and threatened species and allow the LPA to discharge its duties under paragraph 187d of NPPF 2024 and s40 of the NERC Act 2006 (as amended).

Please do not hesitate to contact us if you have any queries in relation to this advice.

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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.