



Date: 16 April 2026

Our ref: 15787

Jacques Burrows
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/26/0161
Location: Bowood Bashurst Copse Itchingfield West Sussex RH13 0NZ
Proposal: Demolition of existing dwelling and garage, and erection of replacement (self-build) dwelling with detached garage/garden store.

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Further information required/Temporary holding objection: • Out of date ecological report	☒
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 Preliminary Ecological Appraisal (Arun Ecology Ltd., September 2024), Biodiversity Enhancement Layout (Barry Holdsworth Ltd. September 2025) and Biodiversity Enhancement Layout Plan (submitted January 2026), relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of 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 or designated sites available for determination. This is because the Preliminary Ecological Appraisal (Arun Ecology Ltd., September 2024) is out of date to support this application, in line with CIEEM Guidance¹ and paragraph 6.2.1 of British Standard (BS) BS42020 'Biodiversity – Code of practice for planning and development 2013'. This is because the initial site walkover was undertaken in May 2024.

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.

We highlight that two further surveys for bats were required for Building B1 (residential dwelling) as the structure had moderate suitability to support roosting bats (Preliminary Ecological Appraisal (Arun Ecology Ltd., September 2024).

The site lies approximately 9.7km northeast of The Mens Special Area of Conservation (SAC) ([MAGIC maps](#)) is therefore within the 12.0km Wider Conservation Area for this SAC, within which significant impacts or severance to flightlines must be considered. This is because the habitats within this zone are considered to encompass the wider conservation area which is the full extent of the range of foraging areas required by populations of Barbastelle bats, the qualifying feature of the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). There is one record for Barbastelle bat just over 1km southeast of the site (SBISx – accessed under licence).

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

The site lies approximately 14.4km east of Ebernoe Common Special Area of Conservation (SAC) and therefore lies outside the 12.0km Wider Conservation Area for this SAC. Four European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site ([MAGIC maps](#)): a) 1.5km to the south for Brown long-eared bat and Common Pipistrelle in 2015; b) 2.0km to the southeast for Brown long-eared bat and Common Pipistrelle in 2015; c) 2.0km to the northeast for Common Pipistrelle, Soprano Pipistrelle, Brown Long-eared bat and Natterers' bat in 2013; and d) 2.0km to the northeast for Common Pipistrelle and Soprano Pipistrelle in 2013. There are approximately 105 records of bats within 2km of the site, including Serotine, Natterers, Noctule, Common Pipistrelle and Brown Long-eared Bat (SBISx – accessed under licence). The site lies approximately 13.5km north of Arun Valley SAC, SPA and Ramsar site.

We advise that the LPA will be required to prepare a project level HRA Appropriate Assessment for this application.

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

We support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Preliminary Ecological Appraisal (Arun Ecology Ltd., September 2024) to secure net gains for biodiversity, as outlined under Paragraph 187d and 193d of the National Planning Policy Framework (December 2024). These need to be secured by a condition of any consent. We note that the enhancements are detailed in the Biodiversity Enhancement Layout (Barry Holdsworth Ltd. September 2025) and Biodiversity Enhancement Layout Plan (submitted January 2026), but highlight that the Biodiversity Enhancement plan needs to be revised to indicate the locations of the two integrated bird boxes and the Swift box.

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.

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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.