



Jacques Burrowes
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

Our ref: 16765
Date: 07 May 2026

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/26/0261
Location: Crays Barn Crays Lane Goose Green West Sussex RH20 2LR
Proposal: Demolition of an agricultural building and the erection of 3No. dwellings

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: • European Protected Species – bats • Protected and Priority species	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☒

Please refer to Horsham District Council's advice regarding Water Neutrality requirements following [Natural England's Withdrawal Statement \(31st October 2025\)](#).

Summary

We have reviewed the documents supplied by the applicant, relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation. Unfortunately, no information has been submitted in relation to ecology, other than that for Biodiversity Net Gain. 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 for bats and protected species are provided prior to determination. The reasons for this are outlined below:

European Protected Species: bats

We understand from the Planning, Design and Access Statement (New Form Architecture, January 2026) that the existing Long Barn structure will be demolished and therefore there may be impact to roosting bats. We recommend that a Preliminary Roost Assessment is undertaken and the results submitted to the LPA prior to determination. This assessment can be undertaken at any time of the year.

We highlight that if any trees will be removed for the application, then a Ground Level Tree Assessment for roosting bats will also be required.

In addition, the site lies approximately 10.2km southeast of The Mens Special Area of Conservation (SAC) and therefore lies within the 12km Wider Conservation Area for this SAC, for which significant impacts or severance to flightlines must be considered. The qualifying feature for The Mens SAC is Barbastelle bat, and there are no records for this species within 2km of the site (SxBRC). There are approximately 46 other records for bats within 2km of the site, comprising Whiskered Bat, Noctule, Common Pipistrelle, Soprano Pipistrelle and Brown Long-eared Bat (SxBRC). Three European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site as follows: a) for Brown Long-eared and Common Pipistrelle bat 1.1km to the south in 2016; b) for Brown long-eared bat 1.8km to the south in 2017; and c) for Common Pipistrelle bat 2.0km to the northeast in 2017 ([MAGIC maps](#)). The site lies approximately 15.6km southeast of Ebernoe Common and 5.8km east of Arun Valley SAC, SPA and Ramsar site.

The additional surveys are required in accordance with [Government Standing Advice](#) which says that you should ask for a survey if:

- *distribution and historical records suggest bats may be present*
- *the development site includes or is close to [any built structures](#), on or underground, that provide commuting, foraging or roosting opportunities for bats*
- *the development site includes or is close to [trees](#), shrubs, rock formations, quarries, natural cliff faces or water bodies that provide commuting, foraging or roosting opportunities for bats*

Protected and Priority species (including reptiles)

We also recommend that a Preliminary Ecological Appraisal should be undertaken in order to assess any impacts to Priority species, including reptiles. Hedgerows can provide suitable habitat for reptiles and other mobile protected species (such as Hedgehog). This is in accordance with Government Standing Advice, which says you should ask for a survey if:

- *distribution and historical records suggest reptiles may be present*
- *the development proposal is likely to lead to harm to individual reptiles or their habitats*
- *suitable habitat is present at the development site that could support reptiles*

The survey information for bats and additional information for protected and Priority species is 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.

Additional comments

We support the proposed reasonable biodiversity enhancements, including the bee brick, hibernaculum, integrated bat box and integrated bird box on the BNG Proposed Habitat Plan (Arun Ecology, January 2026), which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 180d and 186d of the National Planning Policy Framework (December 2023). The reasonable biodiversity enhancement measures, together with specifications, need to be secured by a condition of any consent.

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 support a lawful decision and overcome our holding objection.

Please 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



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.

We are unable to respond directly to applicants/agents or other interested parties. Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer at the relevant LPA, who will seek further advice from us where appropriate.