Place Services
Essex County Council
County Hall, Chelmsford
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Date: 23 September 2025 Our ref: 08827

Sam Whitehouse
Horsham District Council
Parkside
Horsham
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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/25/0505
Location: Wiltshires Farm Pickhurst Lane Pulborough West Sussex RH20 1DA
Proposal: Conversion and extension of buildings to form a single dwelling

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 on: European Protected Species (Dormouse); and Protected species (reptiles).	☒
Recommend Refusal	☐
Subject to Natural England's comments on the conclusion of the Water Neutrality AA	☒

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 documents supplied by the applicant, including the Protected Species Walkover and Bat Assessment (AEWC, March 2025), relating to the likely impacts of development on designated sites, protected & Priority species and habitats and 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. The reasons for this are outlined below:

European Protected Species: Dormouse

The site is situated central between two large blocks of Ancient Woodland. Following further consultation from the Landscape Consultant it is our understanding that the intention now is to retain any boundary vegetation, including hedgerows and trees. The submitted Protected Species Walkover and Bat Assessment (AEWC, March 2025) do state there is some scattered dense scrub present on site. The ecological report assessment is as follows "*Whilst the area of dense scrub and hedge are considered to have some suitability to support hazel dormice, the presence of gaps over 5m in length between the hedgerow and other lines of trees reduces the connectivity of this habitat. The hedge is not directly connected to any other suitable habitat in the wider landscape such as woodland or other hedgerows. As such it is considered to be highly unlikely that they would use the site."*

We note the Protected Species Walkover and Bat Assessment (AEWC, March 2025) does not appear to be supported by a data search from Sussex Biodiversity Records Centre (SBIS). Given the site is situated between two areas of highly suitable Dormouse habitat, impacts upon transient Dormice cannot be fully disregarded. As such precautionary mitigation measures should be further detailed prior to determination.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for Dormice, European Protected Species. These surveys are required prior to determination because Government Standing Advice indicates that you should "*Survey for Dormice if the development proposal will affect an area of woodland (including deciduous, conifer or mixed woodland), hedgerow or scrub".* These proposals will impact scrub.

Protected Species: reptiles

The Protected Species Walkover and Bat Assessment (AEWC, March 2025) identified the site as having suitability for use by reptile species including Common Lizard, Slow-worm and Grass Snake. The document states "*Further survey is required for reptiles to determine their presence/likely absence within the development site boundary. These surveys need to be conducted between March and September / October and will ascertain reptile presence and population size and thus inform the level of mitigation required*." The results of the reptile surveys are required prior to determination.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for reptiles, Protected Species. These surveys are required prior to determination because Government Standing Advice indicates that you should *"Survey for reptiles if suitable habitat is present at the development site that could support reptiles".*

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.

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.

This is needed to enable the LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).

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.

Additional Comments

The site lies approximately 3.1km southeast 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). There are three Barbastelle records present within two kilometres of the site, the nearest is located 585 metres southwest (SxBRC – accessed under licence). We have reviewed MAGIC and no European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site according to that data search. There are approximately 81 records of bats within 2km of the site, including Common and Soprano Pipistrelle, Brown Long-eared Bat, Natterers and Noctule (SxBRC – accessed under licence). The site lies 8.5km southeast of Ebernoe Common Special Area of Conservation (SAC), and therefore within the Wider Conservation Area for this SAC, and approximately 2.4km 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.

The building which is open sided was sufficiently assessed for its bat roost potential, we are in agreement that a non-licenced method statement is an appropriate approach given the buildings lack of Potential Roost Features, but potential the building could be used opportunistically. The non-licenced methods as detailed within the Protected Species Walkover and Bat Assessment (AEWC, March 2025) has been prepared by a suitably licenced ecologist and should be secured by a condition of any consent should the LPA be minded to grant permission.

If external lighting is required, we support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application to avoid impacts from light disturbance. This needs to be secured by a condition of any consent and implemented in full.

Additionally, the site visits identified a Barn Owl on two occasions flying out of the building, and pellets were observed. The mitigation and compensation measures as detailed are considered appropriate.

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 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.