10th December 2024

Halima Chowdhury
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

By email only

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.

Dear Halima

Application: **DC/24/01609**
Location: **75 High Street Steyning West Sussex BN44 3RE**
Proposal: **Demolition of existing single storey rear extension, garage, and garden room. Erection of single storey rear extension and replacement garage and garden room (Householder)**

Thank you for re-consulting Place Services on the above householder application.

a) No ecological harm/No objection	
b) Requires further information	
c) Recommend grant permission subject to conditions	Yes
d) Recommend refusal	
e) Subject to Natural England's formal comments on the conclusion of the Water Neutrality Appropriate Assessment	Yes
f) Discharge of condition	

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 Emergence Activity Survey Report (Phlorum Limited, October 2024) and Preliminary Ecological Appraisal (Phlorum Limited, October 2024), relating to the likely impacts of development on designated sites, protected & Priority species and 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 note that, following bat emergence surveys in August 2024 on Buildings B1 (main dwelling) and B2 (garden house), the Bat Emergence Activity Survey Report (Phlorum Limited, October 2024) concludes that no bat roosts are present in the two buildings. We support the implementation of the Non-licensed Precautionary Method Statement for bats in Section 4 of the Bat Emergence Activity Survey Report (Phlorum Limited, October 2024), which should be secured by a condition of any consent.

In addition, we note that Building B3 (garage) has negligible bat roost potential (Preliminary Ecological Appraisal (Phlorum Limited, October 2024) and we therefore agree that no further surveys for bats are required for this building. We also note from the Application Form that no trees or hedges will be impacted by the development. Therefore no Ground Level Tree Assessments for potential roost features for bats with regard to trees are required.

As mobile protected species (such as Hedgehog, reptiles and Common Toad) may be present onsite, (Section 5.6 of the Preliminary Ecological Appraisal (Phlorum Limited, October 2024)), we recommend the implementation of a Precautionary Method Statement for mobile protected species. This should be secured by a condition of any consent.

We are satisfied that there is sufficient ecological information available for determination of this application. However, 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.

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.

The mitigation measures identified in the Bat Emergence Activity Survey Report (Phlorum Limited, October 2024) and Preliminary Ecological Appraisal (Phlorum Limited, October 2024) should be secured by a condition of any consent and implemented in full. This is necessary to conserve and enhance protected and Priority species particularly those recorded in the locality.

We also support the proposed reasonable biodiversity enhancements, 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 should be outlined within a Biodiversity Enhancement Layout and should be secured by a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended) and delivery of mandatory Biodiversity Net Gain.

Impacts will be minimised such that the proposal is acceptable, subject to the conditions below based on BS42020:2013. We recommend that submission for approval and implementation of the details below should be a condition of any planning consent.

Recommended conditions

1. **ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS**
   "All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Bat Emergence Activity Survey Report (Phlorum Limited, October 2024) and Preliminary Ecological Appraisal (Phlorum Limited, October 2024), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. This includes the Non-licensed Precautionary Method Statement in Section 4 of the Bat Emergence Activity Survey Report (Phlorum Limited, October 2024), which avoids impacts on European Protected Species.

   This will include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

   Reason*:* To conserve and enhance 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) and Policy 31 of the Horsham Development Framework.

2. **PRIOR TO COMMENCEMENT: PRECAUTIONARY METHOD STATEMENT FOR MOBILE PROTECTED SPECIES**
   "A Precautionary Method Statement for 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 mobile protected species, including Hedgehog, reptiles and Common Toad, 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).

3. **PRIOR TO WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT LAYOUT**
   "A Biodiversity Enhancement Layout, providing the finalised details and locations of the enhancement measures contained within the Ecological Impact Assessment Version 5 (South Downs Ecology, August 2024) relating, shall be submitted to and approved in writing by the local planning authority.

The enhancement measures shall be implemented in accordance with the approved details prior to occupation and all features shall be retained in that manner thereafter."

Reason: To enhance Protected and Priority Species and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (as amended).

Please contact us with any queries.

Yours sincerely

Genevieve Broad MCIEEM MSc BSc (Hons)
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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.