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Horsham District Council
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Our ref: 17653
Date: 3 June 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.

Application: DC/26/0640
Location: Cedar Cottage Sandygate Lane Lower Beeding West Sussex
Proposal: Demolition of existing dwelling and erection of 24no. dwellings including the creation of a new access from Sandygate Lane with associated works.

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: • European Protected Species (bats)	☒
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 following 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.

- Preliminary Ecological Appraisal and Roost Assessment (Arbtech, April 2025)
- Preliminary Roost Assessment (Arbtech, June 2025)
- Coloured Site Layout (OSP Architecture, April 2026)
- Arboriculture Implications Report (SJA Trees, April 2026)
- Bat Emergence and Re-Entry Surveys (BERS) (Arbtech, April 2026)

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: Bats

The assessment undertaken within the Preliminary Ecological Appraisal and Roost Assessment (Arbtech, April 2025), which assessed the site's potential roost features in relation to trees and buildings, is insufficient to fully ascertain the impact upon bats in relation to tree roosts and potential impacts. The document states the following "*Along the northern boundary, there is a fallen tree (shown in photos 14 and 15), with a large linear wound. This provides a suitable roosting feature for bats*". Upon review of photos 14 and 15 we can confirm that the tree does possess a large wound which could be suitable for use by multiple bats. No detail has been provided regarding whether this tree is being retained or whether it was subject to further surveys. This detail was also not possible to ascertain from the Arboriculture Implications Report (SJA Trees, April 2026). We note the results of the Bat Emergence and Re-Entry Surveys (BERS) (Arbtech, April 2026) which assessed the main house identified four Common Pipistrelle day roosts and one Brown Long-eared transition/occasional roost present within that building. As such bats are known to roost within proximity to this tree.

Furthermore, the Preliminary Ecological Appraisal and Roost Assessment (Arbtech, April 2025) states "*There are six more trees within the vegetated garden, which were not subject to a ground level tree assessment (GLTA), due to the unknown nature of tree removal during the site visit. These trees will require an assessment before removal*". The results of the GLTA for the six trees which were not subject to assessment is required prior to determination, unless it can be demonstrated that these are being retained and protected. Any further surveys recommended following the GLTA and details of any mitigation measures will be required prior to determination.

We recommend the results of the GLTA on the above referenced trees is undertaken and if any trees are assessed as PRF-M, these will need to be subject to further surveys if they are to be removed or impacted and the results of these surveys provided prior to determination. If any trees are found to be PRF-I, precautionary measures should be detailed, including details of proposed suitable compensation measures which would need to be in place prior to the loss of any roost resource in accordance with UK Bat Mitigation Guidelines v1.2 CIEEM (Reason and Wray, August 2025). This information is required prior to determination.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, European Protected Species. These surveys are required prior to determination because Government Standing Advice indicates that you should and “*Survey for bats if the area includes buildings or other structures that bats tend to use or there are trees with features that bats tend to use nearby*”.

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 including the Favourable Conservation Status licensing test 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).

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 is not within the 12km Wider Conservation Area for this SAC for The Mens Special Area of Conservation (SAC). We are satisfied the main building has been subject to sufficient survey effort for bats and should the LPA be minded to grant permission, it will be necessary to secure a copy of the European Protected Species Mitigation Licence for bats by a condition of any consent.

We have no objections on any other ecological matters excluding Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the [NatureSpace Partnership](#).

Please contact us if you have any queries in relation to this advice.

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 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.