Place Services
Essex County Council
County Hall, Chelmsford
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Date: 31 July 2025 Our ref: 06429

Steve Astles
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 householder 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/25/1014
Location: Gatewick House Church Lane Steyning West Sussex BN44 3RS
Proposal: Refurbishment and reconfiguration of the main house and associated outbuildings, including selective demolition, upgrades to services, minor extensions, and reinstatement of historical features. (Householder Application).

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

No ecological objection	☐
No ecological objection subject to attached conditions	☒
Further information required/Temporary holding objection	☐
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the Water Neutrality Appropriate Assessment	☒

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 Protected Species Surveys Report (BAT Ecological, September 2024) relating to the likely impacts of development on designated sites, protected and Priority species & habitats. Please note that comments on mandatory Biodiversity Net Gain are provided by Horsham District Council in-house.

We are satisfied that there is sufficient ecological information available to support 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.

The Protected Species Surveys Report (BAT Ecological, September 2024) undertook emergence surveys upon the buildings that will be impacted by the proposals. Brown Long-eared Bat and Serotine were found to be roosting. Buildings B1 and B2 possessed Brown Long-eared maternity roosts and B5, a Brown Long-eared day roost. The document recommends that any works proposed to impact bats and or their roosts should be secured by a bat licence. A copy the EPS mitigation licence or evidence of site registration if applicable by an individual registered to use a Bat Mitigation Class Licence should be submitted to the LPA and secured by a condition of any consent.

Additionally, the Protected Species Surveys Report (BAT Ecological, September 2024) indicates that some of the work can be carried out without the need for a EPS Mitigation Licence, where bats and their roosts will not be directly impacted. We support the implementation of the Non-licensed Precautionary Method Statement for bats where applicable, as advised by a suitably licenced ecologist. We recommend this is detailed within a precautionary method statement for mobile protected species and secured by a condition of any consent.

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 Protected Species Surveys Report (BAT Ecological, September 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 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 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).

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 measures and/or works shall be carried out in accordance with the details contained in the Protected Species Surveys Report (BAT Ecological, September 2024) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

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 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).

2. **PRIOR TO COMMENCEMENT OF ANY WORKS WHICH WILL IMPACT THE BREEDING / RESTING PLACE OF BATS: SUBMISSION OF A COPY OF EPS MITGATION LICENCE OR EVIDENCE OF SITE REGISTRATION UNDER A BAT MITIGATION OR EARNED RECOGNITION CLASS LICENCE FOR BATS**
"*Any works which will impact the breeding / resting place of bats, shall not in in any circumstances commence unless the local planning authority has been provided with either:*
    a) *a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or*
    b) *evidence of site registration supplied by an individual registered to use a Bat Mitigation or Earned Recognition Class Licence; or*
    c) *a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence."*

Reason: To conserve protected 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 s17 Crime & Disorder Act 1998.

3. **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, bats, 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).

4. 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 Protected Species Surveys Report (BAT Ecological, September 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 do not hesitate to contact us if you have any queries in relation to this advice.

Hayley Dean 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.