18 November 2024

Hannah Darley
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 Hannah

Application: **DC/24/1018**
Location: **Woodlands Farm Broadwater Lane Copsale West Sussex**
Proposal: **Change of use of land to a mixed use including settled gypsy accommodation site comprising 2No. pitches. Retention of existing hardstanding and proposed biodiversity enhancements.**

Thank you for consulting Place Services on the above application.

a) No ecological harm/No objection	
b) Requires further information on Ancient Woodland (irreplaceable habitat)	Yes
c) Recommend grant permission subject to conditions	
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 documents submitted by the applicant, but unfortunately there is an absence of ecological information included with the application to help assess the likely impact on designated sites and Ancient Woodland (irreplaceable habitat).

We note the comments of the Council's Assistant Arboricultural Officer and the Woodland Trust in relation to loss of ancient woodland and potential deterioration of this irreplaceable and Priority woodland habitat.

We are not satisfied that there is sufficient ecological information available for determination of this application and recommend that details of survey results, mitigation & bespoke compensation and enhancement measures in accordance with Government Standing advice are required on ancient woodland prior to determination.

This advises the LPA that:

"You should refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees unless both of the following applies:

- *there are wholly exceptional reasons*
- *there's a suitable compensation strategy in place (this must not be a part of considerations of wholly exceptional reasons) - see paragraphs 33 and 34 of the planning practice guidance on compensation guidance*

You should make decisions in line with paragraph 186 (c) of the NPPF.

Ancient woodland, ancient trees and veteran trees are irreplaceable. Therefore, you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal."

Additional information

We also recommend that reasonable biodiversity enhancements should be identified and implemented to secure net gains for biodiversity, as outlined under Paragraph 180[d] of the National Planning Policy Framework (December 2023). These would be secured by a condition of any consent.

Please note that comments on mandatory Biodiversity Net Gain are provided by Horsham District Council in-house and 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 on ecological assessment of impacts on ancient woodland and a bespoke compensation strategy required to overcome our holding objection.

Please contact us with any queries.

Yours sincerely

Sue Hooton CEnv MCIEEM 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.