Place Services
Essex County Council
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Date: 3 August 2026 Our ref: 19997

Steve Astles
Horsham District Council
Parkside,
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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.

Application: **DC/25/0925**
Location: **Tisserand Farm Stane Street Billingshurst West Sussex RH14 9AE**
Proposal: **Change of use to rear parcel of land and existing house. Erection of rear extension to existing commercial building and rear store extensions (part retrospective).**

Thank you for consulting Place Services on the above application.

No ecological objection	☐
No ecological objection subject to attached conditions	☐
Further information required/Temporary holding objection: • **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 Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2025), relating to the likely impacts of development on designated sites, protected and Priority species and habitats and the 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 and recommend that additional information on bats is provided prior to determination.

European Protected Species (bats)

We note from the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2025) that Building B1 (double storey residential dwelling) has moderate bat roost potential, although no evidence of bats was found during the survey. As this building will be demolished, and in accordance with Government Standing Advice and the 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023), we support the recommendation that two emergence / re-entry surveys are required between May and September to confirm presence or likely absence of bats.

We highlight that the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2025) mentions two buildings in the Site Location and Context. However, we assume that this is an error as Appendix 2: Habitat Map and the Planning Portal website both indicate only one building on site.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly for bats, which are European Protected Species. This information is required prior to determination (Government Standing Advice).

The information is 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).

Additional comments

We support the Precautionary Method Statement for reptiles and mobile protected and Priority species (including Hedgehog, which is a threatened and Priority species) in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2025). This needs to be secured by a condition of any consent and implemented in full.

We note that Trees T6 and T7 (both Field Maple) have Potential Roost Features for individual bats (PRFs-I). We therefore highlight that appropriate compensation will be required in advance of works to avoid loss of roost resource (Reason and Wray (2023) *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1.* Chartered Institute of Ecology and Environmental Management). We support the non-licensed Precautionary Working Method Statement in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2025), which includes inspection of any affected trees by endoscope on the day and felling under the supervision of a licensed bat ecologist, as required in Table 6.3 of 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023).

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech Consulting Ltd., November 2025) 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 need to be secured by a condition of any consent.

Please note that 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.

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.
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.