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Horsham District Council
Parkside
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West Sussex
RH12 1RL

Our ref: 16772
Date: 12 May 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. 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/26/0479
Location: Shuckers Farm House Copsale Road Maplehurst West Sussex RH13 6QY
Proposal: Erection of a single storey side extension, detached garage with integrated pool house and swimming pool. (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: • 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 Version VI (Phlorum Limited, January 2026), supplied by the applicant, relating to the likely impacts of development on protected & Priority species and habitats, and 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 details of survey results, mitigation and enhancement measures for bats are provided prior to determination. The reasons for this are outlined below:

European Protected Species: bats

It appears from Section 5.27 of the Preliminary Ecological Appraisal Version VI (Phlorum Limited, January 2026) that there may be removal of trees to facilitate the works. Therefore, we request clarification as to whether a Ground Level Tree Assessment (GLTA) for Potential Roost features (PRFs) for roosting bats has been undertaken on those trees which may be removed. This is required prior to determination to ensure no bats or their roosts are impacted and if they are to be impacted, are suitably mitigated and compensated for.

In addition, we understand from the Preliminary Ecological Appraisal Version VI (Phlorum Limited, January 2026) that the proposed extension will involve the roofing membrane sliding beneath the existing tiles on Building One (B1) (residential house). Although the area of the proposed works has negligible bat roost potential and the thatched roof will not be impacted by the works, we agree that the construction activities may disturb any bats present in the building. Therefore, we support the recommendation in Section 5.5 of the Preliminary Ecological Appraisal Version VI (Phlorum Limited, January 2026) for a 'watching brief' by a suitably qualified ecologist. Therefore, the outline measures for a non-licensed Precautionary Method Statement for bats needs to be submitted to the LPA prior to determination in accordance with [Government Standing Advice](#).

The additional information for bats 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.

Additional comments

We note from the Preliminary Ecological Appraisal Version VI (Phlorum Limited, January 2026) that Building B2 (outbuilding) has negligible bat roost potential. We therefore agree that no further survey for this building is required.

We support the Precautionary Method Statement for mobile protected species (including Hedgehog, which is a Priority and threatened species) in Section 5.21 of the Preliminary Ecological Appraisal Version VI (Phlorum Limited, January 2026). This needs to be secured by a condition of any consent and implemented in full.

We also recommend that reasonable biodiversity enhancements for protected, Priority and threatened species should be identified by a suitably qualified ecologist and implemented 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 need to be outlined within a separate Biodiversity Enhancement Strategy and secured by a condition of any consent.

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](#). We recommend that the NatureSpace Partnership is consulted on this application.

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

Hayley Dean MCIEEM MSc BSc (Hons)

Senior Ecological Consultant

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.

