20 December 2023

Giles Holbrook
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 Giles

Application: DC/23/1524
Location: Southlands Kent Street Cowfold Horsham West Sussex RH13 8BA
Proposal: Proposed land improvement work

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

a) No ecological harm/No objection	
b) Requires further information	
c) Recommend grant permission subject to conditions	Yes
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. As this application does not yet demonstrate water neutrality, we are required to apply a holding objection.

Summary

We have reviewed the documents supplied by the applicant, but unfortunately there is an absence of ecological information included with the application to help assess the potential use of the site by European Protected Species (including bats), protected species and Priority habitats. We note from the Introductory Statement (Douglas J P Edwards, October 2023) that the application site underwent land improvement without permission in 2021 and it appears from Google Maps that the site was cleared of all vegetation.

We note that European Protected Species Mitigation Licences have been granted for Brown Long-eared bat and Common Pipistrelle 800m to the north of the site in 2017, for Common Pipistrelle, Brown Long-eared and Natterers bats 900m to the north in 2012 and for Common Pipistrelle bat 1.5km to the south in 2017 (MAGIC maps https://magic.defra.gov.uk/MagicMap.aspx). In addition, there are at least 20 records of bats to the south, east and north of the site (Sussex Biodiversity Record Centre – accessed under licence).

In the absence of ecological information included with the application, the potential use of the site by European Protected Species (including bats), protected species and the presence of Priority habitats, together with any impacts from the development, was not assessed before works commenced.

However, we are satisfied that there is sufficient ecological information available for determination of this application. With appropriate biodiversity enhancement measures secured, including the planting of a wildflower meadow as specified in the Introductory Statement (Douglas J P Edwards, October 2023), the development can be made acceptable.

Recommended condition

1. **WITHIN THREE MONTHS OF CONSENT: BIODIVERSITY ENHANCEMENT STRATEGY**
   "A Biodiversity Enhancement Strategy, prepared by a suitably qualified ecologist, for protected and Priority species, particularly bats, and habaitats shall be submitted to and approved in writing by the local planning authority.

   The content of the Biodiversity Enhancement Strategy shall include the following:
   a) *Purpose and conservation objectives for the proposed enhancement measures;*
   b) *detailed designs or product descriptions to achieve stated objectives;*
   c) *locations, orientations, and heights of proposed enhancement measures by appropriate maps and plans;*
   d) *persons responsible for implementing the enhancement measures;*
   e) *details of initial aftercare and long-term maintenance (where relevant).*

   The works shall be implemented in accordance with the approved details prior to occupation and shall be retained in that manner thereafter."

   Reason: To enhance protected and Priority species & habitats and allow the LPA to discharge its duties under the NPPF 2023 and s40 of the NERC Act 2006 (Priority habitats & species).

Please contact us with any queries.

Yours sincerely

Genevieve Broad MCIEEM MSc BSc (Hons)
Ecological Consultant
Place Services at Essex County Council
placeservicesecology@essex.gov.uk

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.