



Date: 12 May 2026

Our ref: 16777

Sophie Moore
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

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/26/0514
Location: Oakridge House The Street Thakeham West Sussex RH20 3EP
Proposal: Conversion of existing barn to form 1no. detached self-build dwelling and associated works.

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 Ecology email (Lizard Landscape Design and Ecology, July 2024), 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.

European Protected Species: bats

We are not satisfied that there is sufficient ecological information on protected species and designated sites available for determination. This is because the Ecology email (Lizard Landscape Design and Ecology, July 2024) is out of date to support this application, in line with CIEEM Guidance¹ and paragraph 6.2.1 of British Standard (BS) BS42020 'Biodiversity – Code of practice for planning and development 2013'. This is because the Ecology email (Lizard Landscape Design and Ecology, July 2024) is dated more than two and a half years ago.

In addition, a site walkover was not undertaken, the ecology information is based on a photograph which is not available on the planning portal and the information has not been provided by a suitably qualified ecologist. The Existing Layouts and Elevations Drawing number 1 drawing number 2026 2025.498.01 (Downsview Associates, February 2026) and the Planning Statement Version 1 (MNE Planning Services, March 2026) indicate that the existing barn consist of a steel-framed, closed construction and Bat Conservation Trust advises that bats '*often adapt to the crevices and structural gaps found in agricultural steel-framed buildings*'. [Government Standing Advice](#) states that you should ask for a survey if:

- *distribution and historical records suggest bats may be present*
- *the development site includes or is close to [any built structures](#), on or underground, that provide commuting, foraging or roosting opportunities for bats*

As such we recommend an updated Preliminary Roost Assessment, undertaken by a suitably qualified person is carried out. If further surveys are recommended the results of this are required prior to determination.

In addition, the site lies approximately 9.3km southeast of The Mens Special Area of Conservation (SAC) and is therefore within the 12km Wider Conservation Area for the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The qualifying feature of the SAC is Barbastelle bat, but this species has not been recorded within 2km of the site. Two European Protected Species Mitigation Licences have been granted within 2km of the site: a) 1.0km to the southeast in 2016 for Brown Long-eared and Common Pipistrelle bat; and b) 1.6km to the southeast in 2017 for Brown Long-eared bat ([MAGIC maps](#)). There are 37 records of bats within 2km of the site (Sussex Biodiversity Record Centre – accessed under licence). The site lies approximately 15.0km southeast of Ebernoe Common SAC and therefore lies outside the 12km Wider Conservation Area for this SAC. The site lies approximately 4.6km east of Arun Valley SAC, SPA and Ramsar site.

¹ CIEEM (2019) Advice note on the Lifespan of Ecological Reports and Surveys - <https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf>

Therefore, the LPA will be required to prepare a project level HRA Appropriate Assessment Report for this application.

As a result, we recommend that the applicant's ecologist provides an ecological report to support this application, which would require a site visit and may require updated desk study information. The ecologist will be required to provide appropriate justification, on:

- The validity of the initial report;
- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey(s).

If additional impacts to protected species are identified as a result of the additional ecological assessment, then any necessary further surveys for protected species should also be provided prior to determination. This is necessary as the Government Circular 06/2005 identifies that the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Therefore, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed application, is established before planning permission is granted.

Therefore, this further information is required to provide the LPA with certainty of impacts on protected and priority species and enable it to demonstrate compliance with its statutory duties, as well as its biodiversity duty under s.40 NERC Act 2006 (as amended).

Additional comments

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.

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Please do not hesitate to 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

Email: 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.*
- *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.*