



Date: 23 September 2026
Our ref: 21744

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By email only: 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/26/1274
Location: Reflections Hair and Sunbed Centre 37 London Road Pulborough
West Sussex
Proposal: Demolition of existing buildings and erection of 3-storey apartment building containing 5 dwellings, together with associated refuse and bike storage and landscaping.

Thank you for consulting Place Services on the above application.

No ecological objection	☐
Recommend approval subject to attached conditions	☐
Further information required/Temporary holding objection on: • European Protected Species (bats)	☒
Recommend Refusal	☐
Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐

Summary

We have reviewed the Existing and Proposed Site Plan (DH Architecture + Design, No date given) and Preliminary Ecological Appraisal and Roost Assessment (Arbtech, September 2025) supplied by the applicant, relating to the likely impacts of development on designated sites, 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. The reasons for this are outlined below:

European Protected Species: bats

The submitted Preliminary Ecological Appraisal and Roost Assessment (Arbtech, September 2025) assessed building B1 as having moderate bat roost potential and additionally, their data search (NBN Atlas) suggests the building has previously been assessed as having a maternity bat roost of soprano Pipistrelles, it is noted this is not present on [MAGIC](#). Building B2 was assessed as having negligible potential. As such, the document has recommended a minimum of three further bat emergence surveys are undertaken, the results of which are still required to support the LPA in assessing the impacts upon European Protected Species (bats) and securing appropriate mitigation and compensation measures. As such, the results of the further surveys are required prior to determination.

To fully assess the impacts of the proposal the LPA needs ecological information for the site, particularly bats, which are all European Protected Species. These surveys are required prior to determination because [Government Standing Advice](#) indicates that you should survey for bats if any of the following criteria apply:

- *distribution and historical records suggest bats may be present – you can [search the National Biodiversity Network Atlas](#) by species and location*
- *the development site includes or is close to [any built structures](#), on or underground, that provide commuting, foraging or roosting opportunities for bats*
- *the development site includes or is close to [trees](#), shrubs, rock formations, quarries, natural cliff faces or water bodies that provide commuting, foraging or roosting opportunities for bats*
- *the development proposal includes lighting of buildings or green spaces close to habitats that bats tend to use*

Additionally, the site lies approximately 3.65km northwest of The Mens Special Area of Conservation (SAC) ([MAGIC maps](#)) and is therefore within the 6.5km Key Conservation Area for this SAC. Within this area all impacts must be assessed as habitats within this zone are considered critical for sustaining the populations of bats within the SACs (Sussex

Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The qualifying feature of the SAC is Barbastelle bat, of which there are four records of within 2 km of the site (records between 1999 and 2010), the nearest record is approximately 990m north of the site (Sussex Biodiversity Record Centre (SxBRC) – accessed under licence). There are approximately 267 records of bats within 2km of the site, including Daubenton's, Whiskered, Natterers, Brown Long-eared and Common Pipistrelle (SxBRC). The site also lies approximately 9.3km northwest of Ebernoe Common Special Area of Conservation (SAC) and therefore lies inside the 12.0km Wider Conservation Area for this SAC. Additionally, there are two European Protected Species Mitigation Licences have been granted within 2km of the site (MAGIC maps). One is 700m south and was for a day roost of Soprano Pipistrelle (2016-25246-MIT) and one was 905m south and was also for Soprano Pipistrelle, roost type unknown (2016-24617-MIT). The site lies approximately 1.2km north of Arun Valley SAC, SPA and Ramsar site.

Regarding impacts upon foraging and commuting bats the submitted PEA states *“The proposed development will not result in the removal of any habitats which could be used by foraging or commuting bats. However, the proposed development will include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.”*

The results of these surveys are 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).

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 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.

Place Services have a policy relating to the use of AI. Unless otherwise stipulated, any AI use will be limited to basic proof-reading, grammar, and spelling correction. This response has been reviewed by the author(s). If you have any queries, please [contact us](#) for information about our AI guidance.