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Horsham
West Sussex
RH12 1RL

Our ref: 13170
Date: 2 February 2026

By email only: Planning Department, planning@horsham.gov.uk

Thank you for requesting advice on this variation of condition 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/25/2115
Location: Mackley Industrial Estate Henfield Road Small Dole West Sussex
Proposal: Variation of Condition 1 and Removal of Conditions 4, 9, 10, 11 and 20 of previously approved application DC/25/0993 (Variation of Condition 1 (approved plans list), removal of condition 5 (rainwater harvesting), variation of condition 11 (water neutrality strategy), removal of condition 12 (post-occupation water consumption and removal of condition 17 (mains water connection) of approved application DC/24/1858 (Demolition of existing building and construction of replacement 1.5 storey community pavilion building with associated parking and access)) Relating to water neutrality.

Thank you for consulting Place Services on the above variation of and discharge of condition application. We can only comment on conditions related to ecology.

No ecological objection	☐
No ecological objection subject to attached conditions	☐
Further information required Condition 4 (Biodiversity Enhancement Strategy)	☒
Recommend Refusal	☐

Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment	☐
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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 submitted plans, Cover Letter, Biodiversity Enhancement Strategy (Ecology Partnership, December 2025) and decision notice related to DC/25/0993.

The Cover Letter states the applicant is seeking to discharge Condition 4 (Biodiversity Enhancement Strategy) and remove Conditions 11 and 20, which both relate to Water Neutrality. The discharge and variation of these conditions would vary Condition 1 (approved plans).

Condition 11 and 20: Support removal of conditions.

In Natural England's view the package of ecological resilience measures and proposed licence amendments provides certainty that development in the Sussex North Water Supply Zone (SNWSZ) will not have a likely significant effect on the Arun Valley sites in line with the Habitats Regulations. The long-term solution set out by Natural England and the assessment confirming that development in the SNWSZ will not have a likely significant effect on the Arun Valley Sites means that Natural England has decided to withdraw its September 2021 Position Statement.

Therefore, we support the removal of Conditions 11 and 20 because they are no longer necessary.

Condition 4: Further Information Required

"Pre- Commencement (slab-level) Condition: Prior to any works above slab level, a Biodiversity Enhancement Strategy for protected and Priority or threatened species, prepared by a suitably qualified ecologist, 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 of proposed enhancement measures by appropriate maps and plans (where relevant);*
- d) persons responsible for implementing the enhancement measures; and*
- e) details of initial aftercare and long-term maintenance (where relevant).*

The works shall be implemented in accordance with the approved details shall be retained in that manner thereafter.”

Reason: To enhance protected and Priority species & habitats and allow the LPA to discharge its duties under paragraph 187d of NPPF 2024 and s40 of the NERC Act 2006 (as amended).

Comments

We have reviewed the Biodiversity Enhancement Strategy (BES) (Ecology Partnership, December 2025) which has been submitted in order to discharge Condition 4.

Figures 1 and 2 within the BES show approximate locations for the proposed bat boxes. However, the plans lack clarity and it appears as though one of the boxes is proposed to be located beneath the covered porch area, which would be too low to be suitable for use by roosting bats. One of the boxes is clearly situated within a suitable located at the apex of the gable end. We recommend further clarity is provided regarding the location of the second bat box to ensure the contractors listed in Section 2.5 appropriately place the bat box.

As such, we are not satisfied that the submitted information includes the detail required by this condition.

Recommendation

We are unable to recommend the discharge of condition 4 until the additional information outlined above has been provided.

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.