



Date: 22 May 2025

Our ref: 04321

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By email only: Planning Department, [planning@horsham.gov.uk](mailto:planning@horsham.gov.uk)

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*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.*

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**Application:** DC/25/0629  
**Location:** Former Novartis Site Parsonage Road Horsham West Sussex RH12 5AA  
**Proposal:** Residential development comprising approximately 206 dwellings, including the conversion of 'Building 3' and demolition of 'Building 36'. Vehicular access taken from Wimblehurst Road. Car and cycle parking, landscaping and open space and associated works. The replacement of the existing cedar trees at the site.

Thank you for consulting Place Services on the above application

<b>No ecological objection</b>	<input type="checkbox"/>
<b>Recommend approval subject to attached conditions</b>	<input type="checkbox"/>
<b>Recommend Refusal</b>	<input type="checkbox"/>
<b>Subject to Natural England's comments on the conclusion of the Water Neutrality AA</b>	<input checked="" type="checkbox"/>
<b>Subject to Natural England's comments on the conclusion of the bat AA</b>	<input type="checkbox"/>
<b>Further information required on European Protected Species (bats) and protected species (breeding birds, reptiles and invertebrates)</b>	<input checked="" type="checkbox"/>
<b>Recommended Discharge of condition</b>	<input type="checkbox"/>

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.

### **Summary**

We have reviewed the Preliminary Ecological Appraisal (Greengage Environmental, January 2025) relating to the likely impacts of development on designated sites, protected and Priority species & habitats, and identification of appropriate mitigation measures. 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 on protected species available for determination of this application. We recommend that details of survey results and mitigation measures required to make this proposal acceptable are provided prior to determination. The reasons for this are outlined below:

### **European Protected Species: Bats**

We note from the Preliminary Ecological Appraisal (Greengage Environmental, January 2025) that the former Novartis building has low suitability for summer roosting bats and therefore a single bat emergence survey is required between May and August. We also support the recommendation in the Preliminary Ecological Appraisal (Greengage Environmental, January 2025) that an internal inspection of the building, including the roof cavity, the exterior of the enclosed courtyard and the basement should be carried out to identify any additional Potential Roost Features and/or any signs of roosting bats.

We also note from the Preliminary Ecological Appraisal (Greengage Environmental, January 2025) that the Ground Level Tree Assessment identified that trees T1 (Atlas cedar), T5 (Atlas cedar) and T6 (Atlas cedar) have Potential Roost Features for multiple bats and Further Assessment (FAR) is required. This should be carried out in accordance with the 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins ed., 2023) prior to determination in order to inform any mitigation requirements or the need for further surveys ([Government Standing Advice](#)).

We also support the recommendation in the Preliminary Ecological Appraisal (Greengage Environmental, January 2025) that Night-time Bat Walkover surveys should be undertaken once per season in spring, summer and autumn and that static bat detector monitoring should take place onsite for five consecutive nights per months between April and October. This is because there are suitable habitats onsite for foraging and commuting bats in an unmanaged mosaic of vegetation with trees and scrub connected to the wider landscape via a railway line, and the site is currently unlit.

### **Protected species: breeding birds**

As Peregrine falcon presence has been confirmed onsite and is likely breeding, the site contains suitable habitat for Black redstart and there are records for Nightingale within 2km of the site, the site is considered to support Schedule 1 birds and confirmed nesting birds (Preliminary Ecological Appraisal (Greengage Environmental, January 2025)). Therefore, we support the recommendation for a breeding bird survey, which should be undertaken in accordance with the Bird Survey Guidelines (2025) as recommended by CIEEM (Bird Survey Guidelines for assessing ecological impacts <https://birdsurveyguidelines.org/> [accessed 20th May 2025]). This is in accordance with [Government Standing Advice](#).

### **Protected species: reptiles**

We understand from the Preliminary Ecological Appraisal (Greengage Environmental, January 2025) that there are records for Slow worm, Common lizard and Grass snake onsite and therefore we support an updated reptile survey with seven site visits between April and September in accordance with [Government Standing Advice](#).

If translocation of reptiles to an off-site receptor site is required, we highlight that [Government Standing Advice](#) says:

If translocating reptiles, the proposal needs a receptor site:

- close to the development site, and within the same LPA if possible
- that is at least the same size as the habitat that will be lost, and larger if the lost habitat is of high quality
- that will serve the same function as the habitat to be lost, for example it has hibernation features
- with similar habitat to the area that will be lost, including water bodies
- that does not currently support the same species, but can be improved to make it suitable
- that will be safe from future development and managed in the long term

This means that the receptor site must be identified and assessed to ensure it meets these requirements and it has sufficient carrying capacity for the translocated reptile populations. We recommend that the assessment is submitted to the LPA prior to determination.

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 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.

### **Priority species: invertebrates**

As the site has a suitable range of habitats and a high number of records for Priority invertebrates (including Stag beetle, White Admiral butterfly and Grey Dagger moth) have been made onsite (Preliminary Ecological Appraisal (Greengage Environmental, January 2025)), we support the recommendation for further invertebrate surveys to inform the necessary mitigation measures. These should be undertaken by a specialist entomologist between May and July in accordance with [Government Standing Advice](#).

### **Additional Comments**

We understand that Trees T2 (Atlas cedar) T3 (Atlas cedar) and T4 (Atlas cedar) have Potential Roost Features for individual bats (PRF-I) (Preliminary Ecological Appraisal (Greengage Environmental, January 2025)) and highlight that appropriate compensation for all PRF-Is must be provided in advance of impacts to avoid loss of roost resource. We also highlight that soft felling methods must be supervised by a suitably qualified ecologist under a non-licensed precautionary method statement (UK Bat Mitigation Guidelines CIEEM Version 1.1 (Reason and Wray, 2023)). We support the non-licensed precautionary method statement in the Preliminary Ecological Appraisal (Greengage Environmental, January 2025). This needs to be secured by a condition of any consent.

We support the recommendation that a Wildlife Friendly Lighting Strategy is implemented for this application (Preliminary Ecological Appraisal (Greengage Environmental, January 2025)) to avoid impacts from light disturbance. This should be secured by a condition of any consent and implemented in full. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely to be present within the local area. This should summarise the following measures recommended by [Guidance Note:08/23 \(Institute of Lighting Professionals\)](#) will be implemented:

- Do not provide excessive lighting. Light levels should be as low as possible as required to fulfil the lighting need.
- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used.
- Warm White lights should be used at <2700k. This is necessary as lighting which emits an ultraviolet component or that has a blue spectral content has a high attraction effect on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- Where appropriate, external security lighting should be set on motion-sensors and set to as short a possible a timer as the risk assessment will allow.
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt.
- Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and so should not be relied upon solely.

We support the Precautionary Method Statement for mobile protected species (including Hedgehog, which is a Priority and threatened species) on page 36 of the Preliminary Ecological Appraisal (Greengage Environmental, January 2025)). This needs to be secured by a condition of any consent and implemented in full.

We also support the proposed reasonable biodiversity enhancements for protected, Priority and threatened species, which have been recommended 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 should be outlined within a separate Biodiversity Enhancement Layout and should be secured by a condition of any consent.

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

Please contact us with any queries.

**Hayley Dean MCIEEM MSc BSc (Hons)**  
**Ecological Consultant**

Place Services at Essex County Council

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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.*