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Our ref: 11930  
Date: 16 January 2026

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.*

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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 re-consulting Place Services on the above application.

<b>No ecological objection</b>	<input type="checkbox"/>
<b>No ecological objection subject to attached conditions</b>	<input checked="" type="checkbox"/>
<b>Further information required/Temporary holding objection</b>	<input type="checkbox"/>
<b>Recommend Refusal</b>	<input type="checkbox"/>
<b>Subject to Natural England's formal comments on the conclusion of the LPA's Appropriate Assessment</b>	<input type="checkbox"/>

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 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 have as of 15<sup>th</sup> January 2026 additionally reviewed the following documents:

- Peregrine Falcon Mitigation Strategy (Greengage, September 2025)
- Bat Activity Survey (Greengage, November 2025)
- PRF Inspection Survey (Greengage, February 2025)
- Interim Report (Greengage, no date given)
- Bird Survey Report (Greengage, August 2025)
- Preliminary Roost Assessment (Greengage, March 2025)
- Reptile Survey Report (Greengage, October 2025)
- Bat Hibernation Report (Greengage, August 2025)
- Bat Emergence Survey Report (Greengage, August 2025)
- Invertebrate Survey Report (Greengage, October 2025)

We are now satisfied that there is sufficient ecological information available to support determination of this application.

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

The results of the summer emergence surveys did not identify any bats; however, the hibernation surveys indicate there is the potential for hibernating bats to be present. As such a European Protected Species Mitigation Licence is required. This should be secured by a condition of any consent. We are satisfied that no further surveys are considered necessary.

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.

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

As previously stated, a Peregrine falcon presence has been confirmed onsite and is likely breeding. The further surveys of the building found the roof of the elevator shaft to be the location of Peregrine breeding, with the reason for this location considered likely to be due to the shingle present on the roof. In addition to reviewing the Peregrine Falcon Mitigation Strategy (Greengage, September 2025), we have reviewed an email response which has responded to queries raised in relation to the mitigation strategy. We are satisfied the proposed mitigation and compensation measures for Peregrines are appropriate, including the use of camera footage and altering the building design and providing Peregrine nesting boxes. The measures detailed within the Peregrine Falcon Mitigation Strategy (Greengage, September 2025) should be implemented in full and secured by a condition of any consent.

The Bird Survey Report (Greengage, August 2025) did not identify nesting Nightingale or Black Redstart on site. We are satisfied sufficient survey effort has been undertaken and the proposed implementation of a Landscape Ecological Management Plan (LEMP) and a Construction Environmental Management Plan (CEMP): Biodiversity. Both the LEMP and the CEMP: Biodiversity should be secured by a condition of any consent.,

### **Protected species: reptiles**

We are satisfied that reptiles have been carried out, which identified a low population of Slow worm and Common Lizard on sit. The document states a suitable reptile receptor site has been identified through liaison with Horsham District Council Parks and Countryside team. This site is known as Chennelsbrook Castle, an area of public open space located approximately 1.6km north of the site. An assessment of any existing reptile population at Chennelsbrook Castle is to be undertaken, and enhancement of the receptor site required to ensure it has carrying capacity to support the donor populations of common lizard and slow worm. We recommend that this assessment is submitted to the LPA prior to translocation and that monitoring of reptiles is secured by a condition of any consent e.g. within the LEMP.

### **Protected species: invertebrates**

We are satisfied sufficient survey effort for rare invertebrates has been undertaken and no further surveys are considered necessary. We are satisfied with the recommendation for

enhancements, including landscape specific enhancements to be detailed within a Landscape Ecological Management Plan (LEMP) and secured by a condition of any consent.

**Additional Comment:**

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. The details of a precautionary method statement could be provided within a CEMP: Biodiversity.

We have no objections on ecological matters excluding Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the [NatureSpace Partnership](#).

This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

The mitigation measures identified in the Preliminary Ecological Appraisal (Greengage Environmental, January 2025) should be secured by a condition of any consent and implemented in full. This is necessary to conserve and enhance protected and Priority species particularly those recorded in the locality.

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). Reasonable biodiversity enhancement measures are a separate matter to mandatory biodiversity net gains and the finalised details should be outlined within a separate Biodiversity Enhancement Strategy to be secured as a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006 (as amended).

Impacts will be minimised such that the proposal is acceptable, subject to the conditions below based on BS42020:2013. We recommend that submission for approval and implementation of the details below should be a condition of any planning consent.

**Recommended conditions**

**1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS**

*“All mitigation measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (Greengage Environmental,*

January 2025) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

*This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.”*

**Reason:** To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

**2. PRIOR TO COMMENCEMENT OF ANY WORKS WHICH WILL IMPACT THE RESTING PLACE OF BATS: SUBMISSION OF A COPY OF EPS MITIGATION LICENCE OR EVIDENCE OF SITE REGISTRATION UNDER A BAT MITIGATION OR EARNED RECOGNITION CLASS LICENCE FOR BATS**

*“Any works which will impact the resting place of bats, shall not in in any circumstances commence unless the local planning authority has been provided with either:*

- a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 (as amended) authorizing the specified activity/development to go ahead; or*
- b) evidence of site registration supplied by an individual registered to use a Bat Mitigation or Earned Recognition Class Licence; or*
- c) a statement in writing from the Natural England to the effect that it does not consider that the specified activity/development will require a licence.”*

**Reason:** To conserve protected species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s17 Crime & Disorder Act 1998.

**3. PRIOR TO COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN FOR BIODIVERSITY**

*“A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority.*

*The CEMP (Biodiversity) shall include the following.*

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of “biodiversity protection zones”.*

- c) *Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) *The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) *The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) *Responsible persons and lines of communication.*
- g) *The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) *Use of protective fences, exclusion barriers and warning signs.*

*The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority”*

**Reason:** To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

#### 4. **PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY**

*“Prior to any works above slab level, a Biodiversity Enhancement Strategy for protected, Priority and 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, Priority and threatened species and allow the LPA to discharge its duties under paragraph 187d of NPPF 2024 and s40 of the NERC Act 2006 (as amended).

**5. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**

*“Prior to occupation, a “lighting design strategy for biodiversity” in accordance with Guidance Note 08/23 (Institute of Lighting Professionals) shall be submitted to and approved in writing by the local planning authority. The strategy shall:*

- a) identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and*
- b) show how and where external lighting will be installed (through provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.*

*All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.”*

**Reason:** To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended).

**6. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN**

“A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the occupation of the development [or specified phase of development].

The content of the LEMP shall include the following:

- a) Description and evaluation of features to be managed.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) Details of the body or organisation responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the

management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details”.

**Reason:** To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (as amended)

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.*