Place Services
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Date: 9 December 2025 Our ref: 04128

Jason Hawkes
Horsham District Council
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By email only: Planning Department, 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. 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/25/0415
Location: Former Novartis Site Parsonage Road West Sussex Horsham
Proposal: The construction of 244 new homes (Use Class C3) with vehicular and pedestrian access from Parsonage Road, public open space, landscaping, parking and associated works.

Thank you for further re-consulting Place Services on the above application for Phase 3.

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

Summary

Further to our previous comments on 21 August, we have now reviewed the final protected species reports supplied by the applicant, relating to the likely impacts of development on protected species and identification of proportionate mitigation where results are available.

- Bat Activity Survey report final (Greengage, November 2025)
- Bird Survey report final (Greengage, August 2025)

- Peregrine Falcon Mitigation Strategy (Greengage, September 2025) unredacted
- Reptile Survey Report (Greengage, October 2025)
- Invertebrate Survey Report ((Greengage, October 2025)

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

Protected species:
Surveys for roosting bats, reptiles and breeding bird surveys have now been completed and results and the final mitigation measures provided are considered appropriate and deliverable.

We are satisfied that 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.

The LPA now has certainty of likely impacts on legally protected species and can 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.

Following the Planning Committee meeting of 21st October 20256, we are now satisfied that the impacts can be minimised such that the proposal is acceptable, subject to the updated conditions which refer to the final ecology reports which are based on BS42020:2013. We therefore recommend that submission for approval and implementation of the details below should be a condition of any planning consent.

Recommended conditions amended with references to final ecology reports and the Planning Committee report

1. **ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS (proposed Condition 35)**
   "*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), Bat Activity Survey report final (Greengage, November 2025), Bird Survey report final (Greengage, August 2025), Reptile Survey Report (Greengage, October 2025) and Invertebrate Survey Report ((Greengage, October 2025)****, as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.*

   This will 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) and Policy 31 of the Horsham Development Framework.

2. **PRIOR TO COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN FOR BIODIVERSITY (proposed Condition 6)**

"*No development shall commence until 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 e.g. for Falcon and Little Ringed Plover) and sensitive lighting scheme during construction ***to include measures recommended in the Preliminary Ecological Appraisal (Greengage Environmental, January 2025), Peregrine Falcon Mitigation Strategy (Greengage, September 2025) ,Bird Survey report final (Greengage, August 2025) and***
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).

3. **PRIOR TO ANY WORKS ABOVE SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY (proposed Condition 14)**

"No development above ground floor slab level of any part of the development hereby permitted shall take place until a Biodiversity Enhancement Strategy for protected, Priority and threatened species, prepared by a suitably qualified ecologist in line with the recommendations of ***the Bat Activity Survey report final (Greengage, November 2025), Bird Survey report final (Greengage, August 2025), Invertebrate Survey Report ((Greengage, October 2025)*** *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 including integrated boxes shown on architect drawings;
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).

4. **PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME (proposed Condition 24)**

"No part of the development hereby permitted shall be occupied until a "lighting design strategy for biodiversity" for areas to be lit 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),s40 of the NERC Act 2006 (as amended) and in accordance with Policy 31 of the Horsham District Planning Framework (2015).

5. **PRIOR TO OCCUPATION: LANDSCAPE & ECOLOGICAL MANAGEMENT PLAN (proposed Condition 29)**

"No part of the development shall be first occupied until 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 e.g. reptiles translocated to receptor site to inform ongoing management.

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 for a minimum of 30 years to deliver the required condition of habitats created."

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) and ensure a satisfactory development and in the interests of visual amenity and nature conservation in accordance with Policy 33 of the Horsham District Planning Framework (2015)

Please do not hesitate to contact us if you have any queries in relation to this advice.

Sue Hooton CEnv MCIEEM BSc (Hons)
Principal 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.