Place Services
Essex County Council
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Date: 29 October 2026
Our ref: 23517

Jason Hawkes
Horsham District Council
Parkside
Horsham
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By email only: planning@horsham.gov.uk

Thank you for requesting advice on this discharge of condition 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: DISC/26/0259
Location: Former Novartis Site Parsonage Road West Sussex Horsham
Proposal: Approval of details reserved by conditions 5, 7, 18 and 29 to approved application DC/25/0415 (condition 7 wording amended under Non-Material Amendment application DC/26/0876).

Thank you for consulting Place Services on the above discharge of Condition application. We can only comment on Conditions related to ecology.

Condition
Condition 5: **Further Information Required**

Pre-Commencement Condition: Other than works of site survey and investigations, 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).*
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).

Comments

We have reviewed the Construction and Environmental Management Plan (Greengage, July 2026) and the Bird Hazard Management Plan (Greengage, July 2026) which have been submitted in order to discharge Condition 5.

We are not satisfied that the submitted information includes the detail required by this Condition.

Section C of the condition wording states "*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"* Whilst we are satisfied sufficient detail relating to Peregrine Falcons has been provided, insufficient detail has been provided for Little Ringed Plover. The CEMP: Biodiversity states in Table 2.1 "*Species specific mitigation requirements for*

little ringed plover to include, but not limited to, creation of a mitigation area for this species through creation of an area of bare sparsely vegetated land with a waterbody to provide nesting and foraging habitat. This cannot be accommodated on site and has been delivered off site (e.g within a local nature reserve) met by condition." This detail relates to compensation measures, but includes no detail related to onsite mitigation in the event Little Ringed Plover are encountered onsite during construction.

As such, further detail addressing the above matter is still required.

Recommendation

We are unable to recommend the discharge of Condition 5 until the additional information outlined above has been provided.

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

Yours sincerely,

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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.

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.