



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land at Campsfield Linfield Close Southwater West Sussex
DESCRIPTION:	Outline application with all matters reserved except for access for up to 82 dwellings with vehicular and pedestrian accesses, public open space, noise mitigation measures, landscaping, foul and surface water drainage and associated works.
REFERENCE:	DC/25/0102
RECOMMENDATION:	More Information
SUMMARY OF COMMENTS & RECOMMENDATION: <p>The BNG plan proposes a combined approach of delivering habitat creation and enhancements on-site and off-site. The metric calculations demonstrate there will be a - 6.81% net loss in area habitats and a 24.29% net gain in hedgerow habitats on-site, and a 76.13% net gain in area habitats off-site. This results in an overall combined net gain of 17.71% for area habitats. Whilst the proposal is considered appropriate and feasible, concerns over additionality and double counting should be addressed prior to determination to prevent delay and/or refusal of the Biodiversity Gain.</p>	
MAIN COMMENTS: <p>The below comments relate solely to the BNG proposal within the above application.</p> <p>The on-site BNG is considered significant on-site, and therefore will require a legal agreement to secure. Monitoring reports must be submitted to HDC typically in years 1,2,5,10,15,20,25 and 30. The off-site BNG will also require a legal agreement and registering on the national Biodiversity Gain Sites Register. It must then be allocated to the development, prior to submission of the Biodiversity Gain Plan required to discharge the 'general biodiversity gain condition'.</p> <p><i>Baseline</i></p> <p>Line of trees listed under Section 3 of the BNG Habitat Management and Monitoring Plan Report but mapped as w1f lowland mixed deciduous woodland (UKHab Map, Ecosupport, 2024). As the line of trees has been entered separately within the metric, please can this be mapped separately so its location within the site is clear.</p> <p><i>Post-development</i></p> <p>Discrepancy between Table 3 of the BNG HMMP Report (Ecosupport, 2024) and the metric. Table 3 needs correcting in that modified grassland to be created will reach</p>	

moderate condition, and other woodland; broadleaved will reach moderate condition as per the metric entries. This must be consistent within the HMMP for the purposes of any legal agreement.

Off-site habitats at baseline include individual trees. These have been marked as retained, however these will no longer be individual trees post-intervention, and it is questioned as to whether there is a degree of double counting. I would recommend recording as lost – this does not hugely alter the overall unit net change or percentage for off-site.

This also applies to the on-site line of trees that appears to be incorporated into the on-site woodland planting. Recording this as lost will significantly alter the metric calculations.

There are two hedgerow types entered within the metric for post-development habitat creation, however these have been mapped under a single key in the post-development UKHab map (BNG Management and Monitoring Plan, Ecosupport 2024). For the purposes of monitoring, we will need these mapped separately to ensure that we can apply appropriate monitoring measures within the legal agreement.

Additionality

The baselines for the metrics add up to a different number of units. For area (on-site and off-site combined), the total number of units for the metric including hazel dormouse mitigation habitat and ancient woodland buffer is 24.15, however the metric excluding these habitats has a baseline of 22.41 units. The former metric accounts for a larger area of modified grassland and other broadleaved woodland, whereas the latter metric excludes some of the baseline habitat claiming that it is dormouse habitat and within the ancient woodland buffer. The same is applied to the linear module of the metric, whereby one metric has a larger area of line of trees whilst the other has removed the area from the baseline that is considered dormouse habitat or within ancient woodland buffer. However, it is not understood why the baselines would be different when evidencing habitat created or enhanced is for mitigation/compensation purposes and therefore can only count to no net loss (i.e., 100%). In addition, the metric excluding such habitat from the habitat creation tabs for both area and linear modules still do not reach a 10% net gain (individually). I would invite some clear clarification on how the habitats proposed are additional, with the above in mind.

Habitat management

Details relating to watering method and frequency are missing.

Herbicides should only be used when removing invasive non-native species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) or for other biosecurity purposes. Where manual hand-pulling of undesirable species is sufficient, this technique should be used before considering alternatives.

It is discouraged to plant woodland trees in a linear sequence to avoid the appearance of a plantation woodland (like that for timber production). Random planting should be implemented to create a more semi-natural appearance, varying the structure and microclimates of the woodland, and providing opportunities for glades and natural regeneration.

ANY RECOMMENDED CONDITIONS:

If minded to approve – Scenario 1: BNG Required.

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	12/03/2025