

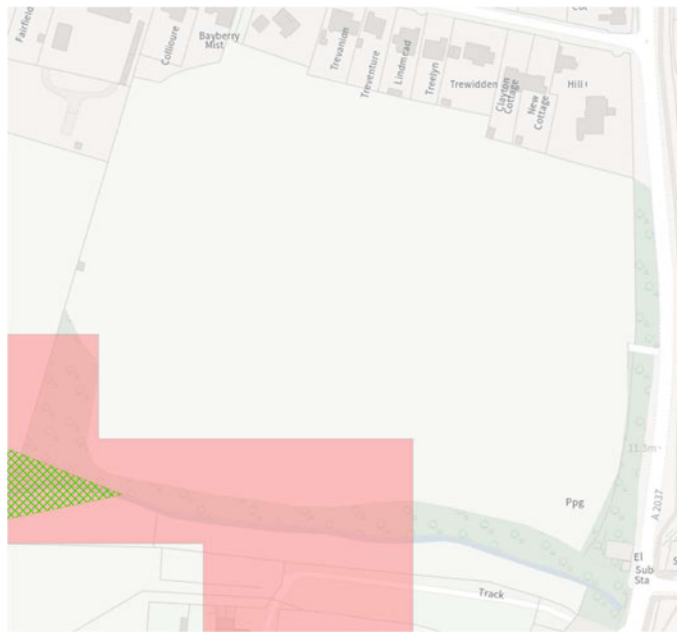


## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Land To The West of Shoreham Road Small Dole West Sussex
<b>DESCRIPTION:</b>	Outline planning application for up to 45 dwellings (including affordable homes) with all matters reserved apart from access.
<b>REFERENCE:</b>	DC/25/1019
<b>RECOMMENDATION:</b>	More Information / Modification
<b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b> <p>As it stands, the metric calculation demonstrates that the development will have a 18.36% net gain (+4.52 units) in area habitats and a 10.62% net gain (+0.31 units) in watercourses. Further information and modifications are requested with regards to the baseline assessment, post-development habitats and design, and the draft HMMP. Some of the requested modifications are likely to alter the above figures.</p>	
<b>MAIN COMMENTS:</b> <p>The comments in this response relate solely to the BNG proposal as part of the above application. Note that the concerns highlighted below are not exhaustive. All other ecology matters will be reviewed by Place Services and NatureSpace, where appropriate.</p> <p>As it stands, the metric calculation demonstrates that the development will have a 18.36% net gain (+4.52 units) in area habitats and a 10.62% net gain (+0.31 units) in watercourses. As the overall net gain is greater than 0.5 units, as per HDC's definition this is considered significant on-site BNG and will therefore require a S106 legal agreement to secure. Monitoring reports will be expected to be submitted to HDC typically in years 1,2,5,10,15,20,25 and 30.</p> <p>The biodiversity gain condition is only applicable to the outline permission, not the subsequent reserved matters, and as such much of the post-development habitat creation and enhancement will need to be finalised to discharge the condition. As such, my comments below concern both baseline and post-development habitats.</p> <p><i>Baseline</i></p> <p>Section 2.1 of the BNG report mentions hedgerows, however these are marked as scrub in the metric and there are no entries within the hedgerow module. Please can further clarification be sought on this.</p>	

The condition assessments for the baseline habitats do not appear to detail the passed/failed criteria. This is required to evidence the concluded condition.

All habitats within the metric have been inputted as having a low strategic significance (area/compensation not in local strategy/no local strategy). However, please note that the south of the site comprising the priority woodland and watercourse fall within a very high potential site of the Wilder Horsham District Nature Recovery Network, and therefore as per HDC guidance, all habitats with a biodiversity value greater than zero within the metric should be assigned as having a medium strategic significance (location ecologically desirable but not in local strategy). It is therefore requested that the strategic significance for habitats in this area is amended.



^Red and green shading above indicate areas that fall within the WHD NRN route.

RCA certification for the RCA assessor does not appear to be visible on Cartographer's public register for qualified surveyors. Please can evidence of certification be requested.

#### *Post-development*

The large grassland area to the north of the site will also be used as mitigation for on-site receptor for translocated reptiles. It is advised that an increase in scrub pockets or log piles are placed throughout this open area to provide increased shelter for reptiles to reduce predation from introduced cats, and any such details incorporated into the HMMP. Furthermore, low-level post and rail fencing and/or signage could be installed to inform residents of the reptiles in the area.

The priority woodland to the south of the site is currently undisturbed [REDACTED]. As such, it is advised that further measures such as planting of thick thorny scrub species within the buffer area to prevent residential access.

Within the metric, other neutral grassland is proposed to be created and enhanced to poor, moderate and good conditions. It is noted in the user comments, that the other neutral grassland in poor condition will be where the swale route is proposed, however it is not clear of the locations of the moderate and good condition other neutral grassland areas. Please can this be clearly marked on the post-development habitat map and

included in the HMMP. It is also recommended to include an area of modified grassland for recreational activities which is subject to more disturbance, to alleviate any recreational pressure from the other neutral grassland / reptile receptor areas.

It is noted that a ditch is proposed along the swale that leads to the SuDS/pond, and another ditch (which appears to be isolated) is proposed to the south of the site. Please can further information be provided on the transition between ditch and swale for monitoring purposes, and feasibility of water retention.

70 trees are proposed to be planted within the metric; however, the indicative site plan illustrates that more are proposed (excluding those within vegetated gardens). Therefore, please can the correct number be confirmed.

In Appendix 2 detailing the positive and negative indicator scores, it appears that there is a change of +3 (resulting in a score of 0) for the eastern module and a change of +4 (score 0) for the western module in indicator E10 Channel bed artificial features severity. There is also a change of +1 (total score 0) for indicator C8 bank face reinforcement extent. Please can further information be provided on the post-development works that result in these changes to indicator scores. It is acknowledged that the change in these scores do not amount to a change in overall condition.

As part of the drainage strategy, installation of a headwall in the stream is proposed to link the SuDS/pond to the watercourse. As such, this needs accounting for in the metric as per the metric user guide.

Given the potential for increased use of fertilizer, herbicide and pesticide in the proposed allotment on site, it is recommended that this is located further north (as demonstrated below with the yellow circles) but with appropriate distance from the scrub boundary. Other proposed locations of the allotment would also be welcome where deemed suitable. Relocation further north will reduce pollutant run-off into the nearby ditch/swale (both of which are entered as biodiversity serving habitats) which flow into a proposed multifunctional SuDS/ pond for biodiversity. Note the potential addition of nutrients to the soil in other neutral grassland (including from the orchard over time) may also increase the soil fertility and consequently increase the abundance undesirable species, thus affecting condition.



There are several category U trees highlighted within tree survey plan. If any of the highlighted trees with a DBH of and above 30cm are to be felled due to a danger to the public as a result of the development, these should be counted within the baseline and recorded as lost. (specifically, trees 3, 16, 41, 52 and 61).

#### HMMP

It is noted in Section 2.3 that it states '*a monitoring report will be submitted to the council during years 5, 10 and 30.*' This is not appropriate, and as per our guidance on significant on-site BNG, monitoring reports will typically be required in years 1,2,5,10,15,20,25 and 30.

Deer culling is suggested as a management technique to protect whips from browsing. This seems excessive for a residential site and is advised that this should be listed under potential remedial measures as a last resort and only if approved by HDC.

Note that Table 3 states spot treating or hand pulling undesirable weed species, however the preceding section 4.9 states that no herbicides will be used within the grassland areas. Please can the Table 3 wording be amended to reflect the wording in section 4.9.

The stated nesting bird season period is inconsistent throughout. Section 3.7 states March – September inclusive, however section 5.3 states March – August inclusive. Please can corrections be made to reflect the former nesting bird season period throughout the document.

Species compositions and proportions (where appropriate) should be added for each habitat type. It is recommended that the planting of night flowering and scented plant species as listed under section 4.15 of the Bat Activity Surveys report (The Ecology Partnership, 2023) should be incorporated where appropriate. Likewise for the species listed under Section 4.13 for hedgerow and tree links, and fruit bearing tree suggestions as listed under Section 4.14.

With reference to section 9.2, only dead trees that pose a safety risk to areas of public access (i.e, outside of the woodland area or for the purposes of access for management) should be felled. Standing dead trees are vital for healthy woodlands and therefore should not be removed unless necessary. This is further supported in section 9.4.

Avoid unnecessarily taking existing deadwood from this habitat to achieve condition criteria for other proposed habitats.

It is noted that a drainage pipe is to be installed in the pond, connecting to the watercourse in the woodland. As such, as per criterion E of the condition assessment, this cannot be passed as the water fluctuation level is controlled by draining to a particular height. As such, without passing criterion E, this pond will not reach moderate condition.

Cross sections of the proposed pond and ditch should be provided and appended to the HMMP.

Note that the bottom of Table 13 is incorrect, and 6 or 7 criteria passed are required to reach a moderate condition.

There is no mention of management practices [REDACTED] within the woodland. Any suggested practices should be specified within the HMMP, or the PMS present in an Appendix.

**ANY RECOMMENDED CONDITIONS:**

If minded to approve:

*Informative*

Scenario 1 – BNG required.

<b>NAME:</b>	Linsey King Ecology Officer (Planning)
<b>DEPARTMENT:</b>	Strategic Planning - Specialists
<b>DATE:</b>	17/09/2025