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**From:** Ecology  
**Sent:** 07 October 2025 11:35  
**To:** Nicola.Pettifer  
**Cc:** Planning  
**Subject:** DC/25/1155 Land East of Tilletts Lane Warnham - HDC Ecology (BNG) Consultation Response  
**Attachments:** DC251155 Land East of Tilletts Lane Warnham - HDC Ecology (BNG) Consultation Response.docx  
**Categories:** Consultations

Hi Nic,

Please see attached my consultation response for DC/25/1155, which is now ready to be uploaded.

I should raise that within the ecology reports, the ecologist identifies that there is an exceptional population of slow worm and a population of grass snake on site. They suggest that if any part of the site is to be developed on, then a receptor site will need to be identified for translocation works. In my opinion, the designated amenity space is not considered sufficient as a receptor site, and therefore an off-site area will should be sought and submitted prior to grant of planning permission. I thought I'd raise this, as I can see Place Services have not yet returned a consultation response yet.

Any questions, let me know.

Best,  
Linsey

**Linsey King**  
Ecology Officer  
Specialists Team - Strategic Planning

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## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Land East of Tilletts Lane Warnham
<b>DESCRIPTION:</b>	Erection of 59 dwellings with associated open space, landscaping, parking, access, and drainage infrastructure
<b>REFERENCE:</b>	DC/25/1155
<b>RECOMMENDATION:</b>	Holding objection / Modification / More information
<b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b> <p>The submitted BNG documents suggest that the development will have a 28.83% net gain (+3.30 units) in area habitats, and a 14.15% net gain (+1.41 units) in hedgerows. However, there are concerns with regards to the baseline assessment, impacts on irreplaceable habitat, and post-development layout. Further issues are also highlighted regarding the content of the LEMP.</p>	
<b>MAIN COMMENTS:</b> <p>The comments below relate only to the BNG proposal within the above application. Please note that the concerns raised are not necessarily exhaustive. All other ecology matters will be reviewed by Places Services and/or NatureSpace, where necessary.</p> <p>As it currently stands, the metric calculation demonstrates that the development will have a 28.83% net gain (+3.30 units) in area habitats, and a 14.15% net gain (+1.41 units) in hedgerows. As such, in accordance with HDC's definition, this is considered significant on-site BNG and will therefore require a S106 legal agreement to secure. Monitoring reports will typically be required in years 1,2,5,10,15,20,25 and 30. However, note that amendments to the metric tool are requested below which are likely to change these figures.</p> <p><i>Baseline</i></p> <p>The drainage plans in Appendix 3 of the Flood Risk Assessment and Drainage Strategy (Motion 2025) map multiple watercourses surrounding the site (many with existing culverts and artificial piping), for which headwalls and a culvert will be installed on. Having undertaken a site visit, there is indeed a ditch network running across the site along the boundary edges. Please can the metric be amended to reflect for this existing habitat in the baseline.</p> <p>It is noted in Table 3 of the Arboricultural Impact Assessment and Preliminary Method Statement (MDJ 2025, Doc ref: MDJAC-24.025-AIAPMS-01) that there are 3x medium trees that are noted to be removed for access roads; T47 hornbeam (DBH 40cm), T63</p>	

ash (DBH 52cm) and T64 oak (DBH 54cm). As per the metric user guide, because these trees have a DBH greater than 30cm, these should be recorded separately from any linear habitat and recorded as lost.

#### *Irreplaceable Habitat*

Veteran trees have been reported on-site in the western hedgerow and north-east hedgerow (see Table 2 in the Arboricultural Impact Assessment and Preliminary Method Statement, MDJ 2025). As such, these must be entered separately in the metric as irreplaceable habitat. It is noted that the post-development plans will include encroachment in the RPA of veteran tree T58, resulting from introducing private gardens. As the use of these gardens cannot be conditioned, it therefore cannot prevent excavation or installation that may consequently damage the underlying roots, thus making the retention of this irreplaceable habitat in its current condition uncertain. As such, if the layout of this area cannot be modified to avoid the RPA, the HDC Arboricultural Officer deems there to be potential impacts as a result, and if the case officer is minded to approve the application with the current site layout, a bespoke compensation plan will be required as per NPPF policy 193(c) and BNG guidance prior to grant of planning permission.

#### *Post-development*

It is noted that to facilitate a connecting road between the western and eastern field, several metres of this hedgerow will be removed. It is noted that there is another gap to the north of this section, and a gap to the north-west of the site, presumably for access to the northern fields. It is recommended that the hedgerow gaps are planted with species of that hedgerow length to enhance connectivity across the site.

The extended phase 1 habitat survey, bat survey report and reptile survey report (all AEWC, 2025, doc refs: 23-246-PEA-v1; 23-246-BAS-V1; and 23-246-RS-v1 respectively) all state that buffers should be implemented *between* the development footprint and retained hedgerows (and the proposed mixed scrub to the south), to prevent disturbance to birds, retain suitable habitat for the slow worm and grass snake on-site, and protect the hedgerows' condition given that it is a priority habitat. Not only this, but many bats including barbastelle have been identified in using the hedgerows as commuting habitat, and as such buffers will also reduce illumination of the hedgerow and retain the ecological function as a dark corridor. However, given the current layout of the dwellings and private gardens directly abutting the hedgerow to the north-west of the site as seen on the post-development map (Figure 5 in Phase 1 habitat survey, AEWC 2025), this is not possible and note that the lighting impacts cannot be controlled in these areas. As such, it is recommended that the development footprint be reduced to allow a vegetated buffer strip with a grassland and tree mix that will provide appropriate habitat in place of the agricultural field margins and screening for these priority hedgerows and protected species. Adequate space is also required for management access.

The effective retention of hedgerow trees is also questioned, in locations where the private gardens lie within the RPAs. It is advised to seek the HDC Arboricultural Officer's views on this.

It is noted that the masterplan/soft landscaping plan and the post-development habitat map (see Figure 5 in the Phase 1 habitat survey report, AEWC 2025) are inconsistent in layout, particularly with regards to proposed tree planting location and number and 'woodland shrub' planting to the south of the southernmost SuDS. Also note that many of the proposed locations of tree planting are within RPAs of existing trees, which is not recommended, particularly in the veteran RPAs.

### *LEMP*

The ecological and the habitats in the submitted draft LEMP do not appear to match that of this application. Please can this be amended and resubmitted for review. This should as a minimum detail the target condition criteria for each habitat type and how management methods will achieve these. A HMMP is required for the S106 legal agreement.

It is noted that individual trees are proposed to be planted within the mixed scrub to the south of the site. It is recommended to include detail in the LEMP as to how these trees will be marked to ensure they are not managed in the same way as the mixed scrub whips that will form the shrub layer.

Note that traditional orchards are priority habitat, and as such will need to meet the UK BAP definition by 30 years. It is recommended to include details as to how this definition will be achieved alongside the proposed condition. Apple, pear and cherry tree varieties should be approx. 8m apart in accordance with the UK BAP profile.

Species compositions should be included for each habitat type. Non-native species should be limited to the more built-up area of the development, and native species incorporated when adjacent or near to the boundary vegetation to avoid non-natives setting seed in these habitats.

### **ANY RECOMMENDED CONDITIONS:**

If minded to approve:

#### *Informative*

Scenario 3: BNG Required + Irreplaceable Habitat

<b>NAME:</b>	Linsey King Ecology Officer (Planning)
<b>DEPARTMENT:</b>	Strategic Planning - Specialists
<b>DATE:</b>	07/10/2025