

K4 Keppel
Daedalus Park
Daedalus Drive
Lee on the Solent
PO13 9FX

9th June 2025

RE: Land at Campfields, Southwater – Ecology comments

This rebuttal has been produced in response to comments received from Horsham District Council with regards to outline planning application DC/25/0102.

The comments received have been included below:

'The planning addendum responding to consultee comments and communicating amendments to the masterplan considering the updated surface water flood risk maps mentions installing a culvert over a ditch for access purposes. During my site visit, a lot of the ditches were inaccessible due to scrub growth. The ditch to the south appeared to be damp despite the week of warm weather, with occasional tufted hair grass and pendulous sedge lining the banks (species indicative of damp soil). The ditch to the north appears drier and has a lot of scrub intrusion and dry leaf litter, with less abundant tufted hair grass and pendulous sedge, with the highest abundance of these species being in the north-west of the site where this ditch joins the watercourse. This ditch appears much deeper and narrower than that of the southern ditch. At the time of the site visit, the water levels of the watercourse were low, and the ponds were dry, but the soil was damp underfoot. As there are no references to ditches on site in the ecology or BNG report, I would invite further comments on whether this has been assessed during the field survey and the watercourse module of the metric considered.'

As the ditches identified in the above comments have not been addressed previously, and were not noted on the topographical survey, an updated walkover of the site was conducted by Amy Johnston BSC (Hons) (Project Ecologist with Ecosupport) on the 6th June 2025 in order to reassess the habitats on site and take updated photos.

During the walkover, the features were identified, but were difficult to view due to the density of scrub particularly from within the site itself (**Fig 1 & 2**). A more established ditch was found to be present outside of the site, towards the northwestern corner, connecting the northern boundary of the site to the watercourse present to the east of the site (**Fig 3**).

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Figure 1. View of the ditch present along the northern boundary of the site (taken June 2025)



Figure 2. View of the ditch present along the southern boundary of the site (taken June 2025)



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Figure 3. View of the ditch found to be outside of the site’s boundary (taken June 2025).




The ditches within the site were all found to be dry, with a buildup of leaf litter and non-aquatic vegetation such as Ivy and Bramble. The soil was damp, but the site visit was following a day of intense rain on the 5th June. Pendulous Sedge (*Carex pendula*) was noted particularly along the public right of way present outside of the southern boundary (**Fig 4**) of the site, indicative of damp soil to be present, however, the site has been identified to be damp overall due to its topography. The sedge was not found to be present within the ditch along the northern boundary but was found in the more established ditch outside of the boundary of the site. The ditches present have not been identified to be carry water on any previous walkovers in March 2023 and March 2024 or during the numerous visits to the site to conduct field work between March and October 2023.

Figure 4. View of the Pendulous Sedge present along the PRoW (taken June 2025).



As per the UKHab Guidelines (**Fig 5**), as these ditches are within a line of trees, they should be recorded as part of the line of trees linear feature.

Figure 5. Screenshot of the UKHab guidelines.



Code and Name

50 Ditch

Category Type

Essential Secondary Codes - Freshwater

Spatial Feature Type

Line

Allowable Primary Codes

g~ w~ h~ r~

Definition

An artificial standing-water or dry ditch linear feature that is <5 m wide and that is ≥20 times longer than its width.

Inclusions

Drainage ditches in fenland or on levels (use r1).

Ditches that are part of the structure of a hedgerow and within 2 m of it should be recorded as part of the hedgerow linear feature (use h2~).

Ditches that are part of the structure of a line of trees and within 2 m of it should be recorded as part of the line of trees linear feature (use w~ and 33 or 34).

[Back to Essential Secondary Code List](#)

As per the BNG guidelines (**Fig 6**), if the ditches are unlikely to retain water for more than 4 months of the year, they can be excluded from the calculation. Due to the presence of leaf litter and lack of aquatic vegetation beyond the Pendulous Sedge which was found along the entirety of the southern boundary, not localised to the ditch, it is considered unlikely that they maintain water levels beyond extreme weather events and peak rainfall in the winter. Therefore, they have not been included within the BNG Calculation.

Figure 6. Screenshot of the BNG guidelines.

Watercourse type	Biodiversity metric watercourse definition	Distinctiveness
Ditch	<p>Artificially created linear water-conveyancing features which are:</p> <ul style="list-style-type: none"> • less than 5 metres wide; and • are likely to retain water for more than 4 months of the year <p>Do not record as a ditch if the watercourse meets the definition of:</p> <ul style="list-style-type: none"> • a higher distinctiveness habitat; or • a canal 	Medium

Kind regards,

Amy Johnston BSc (Hons)

Project Ecologist

Reviewed by:

Lyndsey Barratt BSc (Hons) PGCert MCIEEM

Senior Ecologist

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