

Job Name: **Land North of Guildford Road, Bucks Green, Rudgwick**

Date: **9th October 2025**

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Subject: **Ecological Technical Note – Response to the LPA Ecology Comments**

Please find the responses to the following with regards to the Horsham District Council request for further information regarding BNG for the planning application ref DC/25/1269 dated 23/09/2025. Each request is addressed individually by their corresponding reference numbers.

Ahead of addressing the queries below, we are grateful for the opportunity to re-examine our work with BNG. As well as addressing the queries raised as below, we have been back over all aspects of our PEA, habitat condition assessment, and metric calculation and have consolidated our results. In particular, we feel that the baseline classification of the western field (F1) as modified grassland in 'good' condition was not an accurate measure of onsite conditions. As shown in Figure 1, localised areas of ground damage created by excessive poaching by the onsite cattle have now been measured more accurately, and have been found to cover more than 5% of the total F1 grassland area. As such, this grassland has been found to fail the condition criterion concerning physical damage. As a result, we have come to the more accurate classification of F1 as modified grassland in 'moderate' condition. This has been amended in the corresponding condition assessment tables, within the report, and within the calculation to give a more appropriate result. The proposals have also been more accurately aligned with the final landscape masterplan, to give a more realistic result.



Figure 1: Areas of damaged ground within grassland F1.

Baseline

1.0 & 1.1 – Addressed via corresponding amendments in the relevant documents.

1.2 & 1.3 – Regarding the removal of a number of Category U trees from the southern site boundary, it is not believed that this is relevant to the BNG calculation. UKHab v2 2023 describes a tree as a, 'Forest phanerophyte at any stage of growth'. The AIA report (July 2025) has described all targeted and removed trees referenced in this query as either 'standing deadwood' or 'terminal decline' with no reference to any sort of living canopy. By these descriptions, none would be considered as being within a stage of growth and therefore do not fall within a 'tree' classification within UKHab or the metric. As such, these features cannot be accounted for individually within the BNG calculation. This concept has been more stringently applied across the site in terms of tree classification in this update. However, we can still apply BNG principles to these features, and it is recommended that any deadwood deemed safe to retain on site by an Arboriculture specialist, without risk of fungal dispersal, should be retained as log piles within open greenspace on site. This would ensure that any existing value from this deadwood is retained on site post-development.

Post-development

2.0 – Addressed via corresponding amendments in the relevant documents.

2.1 – All retained hedgerows onsite are no closer than *c.* 15m from any proposed SuDS basins, and all basins fall outside of the RPA of all retained trees. This distance is considered sufficient to safeguard these features. Possibly this comment refers to an offsite linear feature (a cypress group G8 in the AIA report) that is not accounted for within the metric calculation. As this feature was considered offsite, there are no implications in terms of the existing BNG result, however, arboriculture advice should be sought as to whether the distances involved are sufficient to safeguard it.

2.2 – Addressed via corresponding amendments in the relevant documents.

HMMP

3.0-3.4 – Addressed via corresponding amendments in the relevant documents.

3.5 – Once a detailed planting schedule has been drawn up as part of the reserved matters application, the corresponding species lists, as detailed within the query, can be included within the full HMMP report at this later stage. Unfortunately, the recommended hedgerow in the previous version of the metric calculation was not incorporated within the final landscape masterplan. However, an area of mixed native shrub and tree planting on the south-eastern site boundary measured approximately 3m wide and >20m long so has been classified as species-rich native hedgerow with trees to most closely match its anticipated ecological function. The metric calculation and mapping have been updated accordingly.