



## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Land to the South of Furners Lane Henfield West Sussex
<b>DESCRIPTION:</b>	Erection of 29 dwellings with associated landscaping, open space, parking and creation of new vehicular access.
<b>REFERENCE:</b>	DC/24/1538
<b>RECOMMENDATION:</b>	More Information

### **SUMMARY OF COMMENTS & RECOMMENDATION:**

The biodiversity net gain (BNG) proposal is considered adequate and feasible; however, the below comments should be addressed prior to determination. Please also note, comments relating to irreplaceable habitat depend on the response to the Councils Arboricultural Officer's comments.

### **MAIN COMMENTS:**

The comments below relate solely to the BNG proposal in the above application. All other ecology matters will be addressed by Place Services.

#### Irreplaceable Habitat

- In light of the comments made by the Councils Arboricultural Officer, it is strongly recommended that the minimum recommended buffer or root protection area (RPA) for the veteran trees on-site are adhered to with regards to the proposed new vehicle access point. If this is not possible, and it is further deemed by the Arboricultural Officer that installation of the new access within this buffer zone will adversely impact the veteran tree and the Case Officer is minded to approve the application, then bespoke compensation will need to be discussed with the Council. This compensation cannot count towards BNG.

#### Habitat Survey

- Further justification is sought for the classification of modified grassland. From the photographs and botanical species listed, it is possible that this could fall into the 'other neutral grassland' classification if the minimum 3 of 4 criteria are met as per the definition in the UKHab guide, and if the habitat does not qualify under the exclusions.

#### Metric

- User comments for the individual tree entry Ref 12 within the metric mentions that T26 and T27 (for which, T27 there are two trees as per the BNG report) are

medium trees in moderate condition that are to be removed. This does not align with the EcIA and BNG Assessment (Sam Watson Ecology, 2024), which states T26 is a small tree in moderate condition. Please can the correct description be confirmed.

- Please can the tree ID references be added to the individual entries within the metric, in accordance with the trees listed in Appendix 4. This will allow the council to better review these entries.
- Confirmation is also requested as to whether some of the retained trees (not those to be removed) are within hedgerows, and if so, they should be included within the hedgerows with trees classification to prevent double counting.

#### Landscape Plan

- The number of newly planted trees within the metric is 57, however proposed trees within the landscaping plan is 55. Please can the correct number be confirmed, and the appropriate document amended where necessary.
- There are inconsistencies between the habitat map from the EcIA and BNG Assessment (2024), and the Landscape Strategy Plan. Specifically, on the Landscape Plan it maps native hedge being retained in the north-east to south-east of the site with enhancement, however this has been classified as bramble scrub within the EcIA/BNG Report, and there are no hedgerow enhancements within the metric. Please can the baseline and habitat works be clarified.

#### Draft HMMP

- Within the Habitat Retention section (PM-03), it states that the only habitats that are to be retained in their baseline condition are the existing hedgerows. Existing individual trees and bramble scrub to be retained should be included in this section.
- It is not clear what condition assessment criteria are to be achieved by year 30 for the proposed individual trees, mixed scrub, or native hedgerows. Please can this be confirmed.
- The Landscape Plan should also be included within the HMMP.

#### **ANY RECOMMENDED CONDITIONS:**

BNG Informative.

<b>NAME:</b>	Linsey King Ecology Officer (Planning)
<b>DEPARTMENT:</b>	Strategic Planning - Specialists
<b>DATE:</b>	07/11/2024