# HORSHAM DISTRICT COUNCIL CONSULTATION

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| **TO:** | Horsham District Council – Planning Dept |
| **LOCATION:** | Land West of Ifield Charlwood Road Ifield West Sussex |
| **DESCRIPTION:** | Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising: A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside: An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition. This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way. |
| **REFERENCE:** | DC/25/1312 |
| **RECOMMENDATION:** | Holding Objection / More information |

**SUMMARY OF COMMENTS & RECOMMENDATION:**

The metric calculation tool demonstrates that the development will have a 12.70% net gain (+107.40 units) in area habitats, a 10.07% net gain (+6.14 units) in hedgerows, and a 10.14% net gain (+8.22 units) in watercourses. However, there can be no net gain whilst there are impacts on irreplaceable habitat and no provision of a sufficient compensation strategy. As such, I have recommended a holding objection on these grounds. In addition, further information is requested with regards to providing habitat references in the metric, the watercourse module, buffer zones for sensitive habitats and sites, and details within the LEMP. Modifications are also requested with regards to the location of the sports pitches and allotments.

**MAIN COMMENTS:**

The comments below pertain primarily to the Biodiversity Net Gain proposal as submitted in the above hybrid application. However, it should be noted that these comments are not exhaustive. All other ecology matters will be reviewed by Place Services and NatureSpace. Given the number of concerns raised and the high number of documents submitted as part of the application, a letter response addressing each point (with appropriate signposting where necessary) would be appreciated for a swift review.

The metric calculation tool demonstrates that the development will have a 12.70% net gain (+107.40 units) in area habitats, a 10.07% net gain (+6.14 units) in hedgerows, and a 10.14% net gain (+8.22 units) in watercourses. As such, in accordance with HDC's definition, this is considered significant on-site BNG and will therefore need to be secured via a S106 legal agreement. Given the application proposes creation of lowland meadow which is a very high distinctiveness habitat, and the success of this habitat is dependent on the establishment period, it is requested that monitoring reports be submitted in years 1,2,3,4,5,10,15,20,25 and 30. Note, that this is different to our standard approach, by inclusion of **years 3 and 4**.

As the deemed biodiversity gain pre-commencement condition is applicable to outline permission, an Overall Biodiversity Gain Plan will be required to discharge the condition. A Phase Biodiversity Gain Plan for each phase must also be submitted to and approved by HDC before the development of that phase can begin.

*Baseline*

*Accounting for habitat loss*

1.0 It is stated in section 4.2.2 of the BNG Report (Ramboll, 2025) that '*61 individual trees (2 large, 18 medium, 41 small) as defined according to the UKHab survey and the Statutory Metric user guide, could be removed as a result of the Proposed Development. Some of these trees will definitely be removed and some will potentially be removed subject to detailed design*'. During a brief meeting on the 16th October, it was stated that due to the uncertainty surrounding final numbers of tree loss, a precautionary percentage of trees will be recorded as lost within the baseline. However, no such figure is apparent within the BNG reports. Please can it be signposted as to where this is detailed within the BNG reports. Also note that any trees with a medium or more DBH as per the metric user guide that are being removed from linear hedgerow habitats must be counted for separately within the metric and marked as lost.

*Invasive non-native species*

1.1 During a site visit on 13th October, several stands of invasive non-native Himalayan balsam were identified on the banks of the River Mole and within adjacent fields, which is not identified within Appendix 2 of the Ramboll BNG Report (2025). Therefore, to avoid its spread, this must be removed and details of such should be within the LEMP/HMMP, alongside methods to remove other identified INNS as per Appendix 2 (including cherry laurel). Removal of INNS is also an objective of the Rusper Ridge Biodiversity Opportunity Area. This action can be considered an enhancement to the River Mole.

*Condition assessments*

1.2 The completed condition assessment sheets showing the passed and failed criterions do not appear to be within the Arcadis BNG Report (2025) for the detailed component to support the baseline habitat condition assessments as inputted within the metric. Please can this be provided.

*Irreplaceable Habitat*

2.0 One veteran tree is due to be removed for laying of the access road in the north. The proposed compensation suggested in section 7.14.24 of the Planning Statement includes:

- Extensive tree and woodland planting, including those of the same species as the lost veteran tree, is proposed within proximity of the location of T368 which can be managed to become veteran trees in the future;
- Newly created planting to mimic the conditions provide by the veteran trees to support the species were reliant upon the tree;
- Creation of vertical 'stacks' of the veteran tree and relocated within the Site to decompose naturally and add invertebrate habitat;
- Collection of seeds and cuttings from the veteran tree to propagate new trees would ensure their genetic legacy continues; and
- Screening barriers to protect existing veteran trees from dust and pollution during construction of the Proposed Development.

The above points are welcome. Note that additional actions provided in section 4.2.1 of the Ramboll BNG Report include replanting of the main tree stump, including excavation and relocation of the root plate where feasible, inclusion of fruit tree planting which are known to veteranize more rapidly (although note that this does not provide the same ecological function as a larger tree veteran species), and artificial veteranisation of selected mid-ages trees within adjacent retained habitats.

However, much detail is missing to form a satisfactory compensation strategy. As the impact of the veteran tree loss is within the detailed component of the application, as per para 193(c) the NPPF, development resulting in the loss or deterioration of irreplaceable habitat… should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. At present, the information provided is not considered sufficient, as there is no detail relating to number or availability of appropriate trees to be veteranized, number of trees, species proposed and their compensation/density or location. As such, there is no way to determine whether the proposals so far are appropriate or feasible. If the Case Officer deems that this development has exceptional reasons to remove the veteran tree, then a suitable compensation strategy must be agreed to discharge the deemed biodiversity gain condition. As such a formal plan is required, and this plan will need to be secured. To allow for future long-term monitoring, it is advised that the securement of the compensation strategy is included within any S106 legal agreement.

It is noted that there is a desire to retain the openness of the north of the site from a landscape perspective. Therefore, it has been suggested in a brief meeting on 16th October that the above points can be delivered via woodland planting immediately adjacent to already existing woodlands around the periphery of the north of the site. This is also in accordance with the Rusper Ridge Biodiversity Opportunity Area objective of woodland planting. We would encourage the incorporation of glades, a varied structure, scalloped edging and planting native species that are found within the nearby woodlands.

2.1 It is noted buffers of 25-30m are proposed for retained veteran trees during the construction phase. It is also requested that these are mapped and appended to the CEMP.

*Metric*

*Area Module*

3.0 The entries within the area habitat module of the metric do not have corresponding habitat reference numbers, making review difficult and align with the condition assessment information in Appendix 6 of the Ramboll BNG Report (2025). Please can these be added.

3.1 Table 7 of the Arcadis BNG report (2025) states that a target of good condition should be endeavoured for all areas of woodland planting within the nature recovery network area. There are no woodlands within the creation tab of the metric with a target condition of good. However, there are enhancements of existing woodland to good condition – please can further clarity be sought on the statement in Table 7.

*Hedgerow Module*

4.0 The majority of the hedgerow entries do have habitat reference numbers, although there are a few entries with missing references. Please can these be added.

*Watercourse module*

5.0 It has been noted that the Environment Agency (EA) have provided comments relating to the watercourse module of the metric. They have highlighted that '*The baseline assessment appears to include the proposed river crossing (0.05 km) only, whilst excluding ~0.2 km of the River Mole upstream of the Ifield Brook confluence that is adjacent to the site. Therefore, the baseline assessment should be updated to include all watercourses where the top of bank is within 10 metres of the red line boundary'*. I agree that all other rivers and streams within 10m of the red line boundary and ditches within 5m of the red line boundary must also be included in the calculations. Please can further clarity be sought.

5.1 Note that there are no habitat reference numbers within the full detailed component entries of the metric, making it difficult to review and align with the condition assessment information in Appendix 6 of the Ramboll BNG Report (2025).

5.2 The EA also highlights that there is an indication in the Ramboll BNG report that 0.3km of the Hyde Hill Brook in the northwestern site boundary has not been included within the metric calculation. Please can this be addressed, and the appropriate corresponding habitat references be added and clearly located on the UKHab baseline maps. The references should also be carried over into the post-development tabs, and new ones assigned for new watercourse creations where appropriate – this excludes instances where the metric rules states that existing watercourses should be marked as lost and created with an adjusted creation 10+ years in advance to account for riparian and watercourse encroachment. Details of such encroachment should also be included in the user comments. It is noted that proposals include flood risk management interventions with potential for works to the riparian zones of the River Mole and Ifield Brook watercourses (and their river channels) to increase floodplain volume and river flow conveyance capacity. I echo the issue raised by EA with regards to the missed adjustment of the proposed River Mole bridge riparian encroachment to major/major. Please can this be amended.

5.3 It is acknowledged that the development is to deliver 2.2km of ditches in moderate condition within the outline area of the application to achieve the minimum 10% net gain on the watercourse module. Further details and locations of these ditches must be

provided at reserved matters, and they must not conflict with other considerations such as drainage and flood risk.

5.4 25-30m vegetated buffer zones are proposed from the top of the bank for every watercourse and drainage ditch during the construction stage as specified in the Arcadis Ecological Mitigation Plan. Please can these be annotated on the detailed component maps and appended to the CEMP.

5.5 It is noted within section 3.7.2 of the BNG Report (Ramboll, 2025) it states '*some of these drainage channels on the Ifield Golf Course have been scoped out of having a 5m riparian zone for the purpose of this assessment due to their small size and lack of connectivity to other drainage features and rivers and are referred to as 'small drainage channels' in this report*'. It is not understood why this approach was adopted, as this does not align with Tables 10, 11 and 12 of the biodiversity metric user guide. Please can further clarification be provided.

*River Condition Assessment*

5.6 The RCA assessors mentioned in the Ramboll BNG report are not present on the Cartographer Public Register. As such, please can certification be provided to evidence their qualifications.

5.7 No details of the MoRPH survey locations or Cartographer outputs of the River Condition Assessment has been provided in either BNG report. Please can these be submitted for review, including the positive and negative indicators for watercourses with proposed enhancements.

*Post-development*

*Habitats*

6.0 It is understood that 1.33ha of lowland meadow (priority habitat) in good condition is proposed in the north of the site, with other areas of tussocky grassland for the reptile populations on the golf course. Within ES Chapter 6 (Soil and Agriculture), it mentions that the soils are naturally seasonally waterlogged (Wetness Class IV) and therefore propose drainage improvements (where feasible) could raise their suitability to Wetness Class III, allowing for the successful establishment of lowland meadows. Given that much of the UK land (primarily farmland) has lost the ability to absorb water, it does not seem appropriate to drain land for creation of traditional lowland meadow but rather enhance the current grassland to restore a wet / floodplain meadow and incorporating resilient species.

In the absence of soil nutrient information (in particular Phosphorous), it is difficult to ascertain the feasibility or appropriateness of such enhancements to reach a very high distinctiveness habitat.

6.1 It is also noted that one pond (priority habitat) is proposed within the Ifield Meadow Buffer, and another pond (priority habitat) is being relocated. Furthermore, lowland mixed deciduous woodland (priority habitat) is being created in the north of the site and as part of the detailed component. Further details will be required in the LEMP as to how these habitats will reach priority habitat status by 30 years. Note that any excavations within the buffer zone should not be within any existing tree RPAs.

*Layout and Design*

- *Buffers*

6.2 It is not clear as to what size vegetated buffer zones are located where. For example, in Section 2.5.6 of the BNG Report (Homes England, 2025) it mentions 15m mitigation buffer has been applied to ancient woodlands, and a 5m buffer has been applied to Hyde Hill Wood LWS, however in the Phase 1 Ecological Mitigation Strategy (Arcadis, 2025) it mentions a 35m buffer at Hyde Hill Wood LWS. It would be beneficial for the buffer zones and their sizes to be marked on the habitat maps, so it is clear. Note that a minimum 5m vegetated buffer for LWS is not considered sufficient to mitigate the impacts of increased recreational disturbance and predation. As per the Phase 1 Ecological Mitigation Strategy, buffers of between 25-30m should be implemented around sensitive habitats, such as those listed. They should also incorporate spiky species, such as hawthorn and blackthorn, to act as a deterrent.

- *Connectivity*

6.3 The access roads, particularly to the north with a 40mph speed limit, acts as a barrier for species traversing the landscape. Underpasses for the roads, installation of a clear-span style bridge across the River Mole with mammal ledges, and canopy crossings to allow for connectivity are welcome. I would also advise that due to water likely to collect within these underpasses due to the clay soil, all underpasses should also incorporate a mammal ledge to allow movement of more water-averse animals.

- *Sports pitches*

6.4 It is noted that the location of the proposed sport pitches are close in proximity to watercourses, hedgerows and woodland. It is therefore requested that all sports pitches are greenfield pitches. Where this is not possible and artificial pitches must be installed, there are initial concerns with regards to microplastic / infill and artificial lighting pollution.

To avoid any adverse effects, it is therefore suggested that where feasible, the artificial pitch should be in a field that is not surrounded by or near to sensitive habitat. Consideration should be given to rubber infill use, with a polymeric infill material ban coming into force in the EU in 2031, with an 8-year transition period so existing fields containing polymeric infills can continue to reach their end-of-life. DEFRA is currently reviewing emissions of intentionally added microplastics in the UK, including rubber infill, to inform future regulatory actions in the UK. It is therefore advised that a non-infill design is installed, or alternative infills used such as ground natural cork or coconut husk, and incorporation of containment barriers and shock pads to reduce volume of infill and therefore maintenance. In addition, many artificial pitches require periodic deep cleaning. We strongly recommend that chemical products are not applied at any time due to impacts on existing watercourses and waterbodies, and the nearby woodlands and hedgerows.

Artificial lighting sympathetic to wildlife will also need to be considered, both at the sports pitch locations and across the site.

- *Allotments*

6.5 The proposed location of the allotments is generally located near woodland (including ancient) ponds/SuDS and watercourses, and there are therefore concerns regarding potential impacts from fertilizers and biocides. It is therefore requested that these are placed more centrally within the development footprint and away from sensitive habitats, and particular consideration be given to pollutant filtration.

*Landscape and Ecological Management Plan*

7.0 A full LEMP (or HMMP) is required for the legal agreement to secure BNG. The submitted draft LEMP is lacking with regards to management details of habitats, and how the targeted condition criterions will be achieved to meet the overall target condition for the habitats as per the metric entries – for both detailed component and outline. Additionally, it should include a risk register, trigger points and associated remedial action in the first instance. It is advised to follow the structure/content of Natural England's HMMP template. These amendments will need to be reviewed and approved prior to signing the legal agreement.

7.1 It is recommended that all ecological mitigation is mapped on the Landscape Typologies Plans which are appended to the LEMP. This includes locations of proposed sparsely vegetated south-facing banks and slopes and areas of sandy ground, bee bricks/hotels, and bird/bat boxes.

7.2 It is noted that areas of hawthorn scrub are proposed within the site. However, given the mitigation priorities to provide for the brown hairstreak, it is encouraged to incorporate more blackthorn within the site. It is therefore suggested to make this a hawthorn and blackthorn scrub mix.

7.3 Given that a potential juvenile dormouse nest was identified on site, albeit not conclusive evidence of presence, it is advised to also incorporate native honeysuckle (*Lonicera periclymenum*) and traveller's joy (*Clematis vitalba*) climbing species to the scrub mixes, hedgerows and woodland understorey, to provide foraging sources and nesting materials, and also to provide for night-flying invertebrates. Introducing coppice management will also provide benefits to wildlife and will help to maintain a diverse age structure within woodlands.

**ANY RECOMMENDED CONDITIONS:**

If minded to approve –

*Informative*

Scenario 2: BNG Required + Phased Development

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| **NAME:** | Linsey King<br>Ecology Officer (Planning) |
| **DEPARTMENT:** | Strategic Planning - Specialists |
| **DATE:** | 07/11/2025 |