



## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Land To The South of Broadbridge Way Broadbridge Heath West Sussex
<b>DESCRIPTION:</b>	Full Planning Application for the erection of 89no. residential dwellings comprising dwellings (54no.) and apartments (35no.), 36% affordable homes, creation of new vehicular access on to Sergeant Way, provision of public open space, landscaping and drainage solutions.
<b>REFERENCE:</b>	DC/25/0894
<b>RECOMMENDATION:</b>	<a href="#">Holding Objection / Modification</a>
<p><b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b></p> <p>The development demonstrates it will have a net loss in area habitats and hedgerows and will reach no net loss for watercourses. It is not clear how the applicant intends to achieve the 10% BNG requirement. There are concerns pertaining to the baseline assessment and overall design and layout of the development, which need addressing prior to grant of planning permission, and further issues are highlighted relating to proposed post-development habitats.</p> <p><a href="#">Many of the concerns have been addressed, which is welcome. There are still concerns pertaining to the baseline assessment which needs further clarification and amending where necessary.</a></p>	
<p><b>MAIN COMMENTS</b></p> <p>The below comments relate solely to the BNG proposals within the above application. All other ecology matters will be reviewed by Place Services. Please note that the below concerns and issues is not an exhaustive list.</p> <p><a href="#">The level of baseline scrub mapped on the Phase 1 Habitat Map (Figure 1 in the BNG Report, Derek Finnie Associates, 2025) has increased, however the metric entry extent has remained the same. In addition, despite the removal of the plots and relocation of open space, there is no change to the proposed habitat creation tab within the metric. Therefore, further confirmation is required as to the correct hectares of these habitats.</a></p> <p><b>Non-significant on-site BNG</b></p> <p>As the proposal currently stands, the development demonstrates it will have a -45.52% net loss (-3.83 units) in the area habitat module, a -1.96% net loss (-0.04 units) in the hedgerow module, and no net loss (0% and 0 units) in the watercourse module. As there is no net gain in any of these modules, the on-site proposals are considered non-significant, and therefore will not require a legal agreement to secure the delivery or to</p>	

be managed and monitored for 30 years. However, any amendments in response to the concerns listed below may trigger the definition of significant on-site BNG.

The updated metric demonstrates that the development will have a -45.20% net loss (-4.27 units) in area habitats, a 12.32% net gain (+0.51 units) in hedgerows, and no net loss (0% and 0 units) in watercourses. However, note that the trading rules are not met within the hedgerow module, and as such this net gain is not considered to be achieving the minimum 10% requirement and additional units will need to be sought to satisfy these rules. Additionally, further metric amendments are requested below which are likely to amend the final figures.

### **Intention to meet 10%**

Section 3.2.3 of the BNG Report (Derek Finnie Associates, 2025) states that '*offsite options, or the purchasing of credits for a third party, will be considered to ensure that a 10% increase in BNG is realised as a result of the scheme*'. HDC need to be assured that the 10% requirement can be met. Therefore, please can a clear statement of intent be provided to detail how the applicant intends to meet the 10% BNG requirement through off-site solutions.

This does not appear to have been addressed.

### **Baseline Habitats**

#### *Ditch*

The dry ditch on-site has been entered as poor condition within the metric, however Table 1 of the BNG Report (Derek Finnie Associates, 2025) states it is moderate condition. This ditch is also marked as retained within the metric, however there is no indication on any landscaping plans or drainage plans that this ditch is going to be retained. Please can these points be addressed, and amendments made to the metric.

It is noted that the dry ditch running east to west has been classified within the watercourse module, whereas the wet ditch running north to south has been classified within the hedgerow module. The metric user guide states that when a ditch associated with a hedgerow meets the definition of a watercourse, the 'associated with ditch' habitat types should not be used, and the ditch must be recorded as a length in the watercourse module. This is particularly important to consider given the proposed works of culverting the north of the ditch which leads to the drain, and the proposed dwellings near to the ditch and potential riparian encroachment. Therefore, please can further comments be provided as to how this ditch does not meet the definition of a watercourse ditch as per the metric user guide.

The dry ditch has been omitted from the metric, with the reasoning given it was '*reportedly created to prevent unauthorised third-party access to the Site. As this does not meet the definition of a ditch within the Metric, i.e. it was not created to carry water, it has not be considered further in this assessment*'. The user guide does not differentiate between created purpose and resulting function as a ditch. However, after my site visit on 20<sup>th</sup> November (after a period of rainfall), it is apparent that this ditch does not collect or convey water and is therefore unlikely to retain water for a minimum of 4 months of the year. I accept that this ditch does not meet the definition as per the metric user guide and therefore does not need to be included within the watercourse module of the metric.

The ditch running north to south has been reclassified as a wet ditch within the watercourse module of the metric. This amendment is welcome. However, note that the installation of a culvert and footbridge will increase the levels of riparian and

watercourse encroachment, which needs to be reflected in the metric. To do this, please follow the guidance on page 51 of the metric user guide.

It is acknowledged that the updated landscaping plans have removed the plots that were encroaching within the ditch riparian zone, and instead an open space area is proposed. This is welcome.

#### *Trees*

It is noted that there are more than 1x mature trees within the line of trees habitat. As such, further clarification is requested on why this has not been classified as ecologically valuable line of trees as per UKHab definition.

This has been amended, with thanks.

There are no individual tree entries in the metric, however some trees outside of habitat types that are categorised by trees (e.g., hedgerows and scrub) with a DBH of 7.5cm or greater are being lost e.g., T21 (DBH 8cm), and T35 (DBH 30cm) (see Tree Protection Plan, ACD 2025 and Appendix 2 of the Tree Survey Report, ACD 2024). As such, please can these be accounted for within the metric.

G38 and T42 (ash trees) within the line of trees are proposed to be reduced tgo a monolith. The metric user guide states *'where there is no loss (or change of condition) of individual trees within a hedgerow or 'rural' line, the individual trees within that feature do not need to be recorded separately in the baseline'*. Therefore, further comments are requested as to whether these works will reduce the condition of these trees and as such should be accounted for separately.

It is apparent that G9 comprises trees with the highest DBH being 7.5cm. However, it is not clear from the ACD Tree Protection Plan (2025) or ACD Tree Survey Report (2024) whether these are proposed to be retained. Please can confirmation be sought on this point.

0.1099ha of individual trees (equivalent to 3x small and 6x medium trees) has been added to the baseline and marked as lost. This accounts for the trees mentioned above, and group G38 and T42 (see below) which were originally marked as reduced to a monolith to now marked for full removal. Concerns resolved, with thanks.

#### *Hedgerow*

The hedgerow module of the metric contains an entry for 'native hedgerow with trees' which is presumed to be the vegetation along the northern boundary. However, there are no details provided with regards to species composition within the Ecological Assessment Report (Derek Finnie Associates 2025) or BNG Report (Derek Finnie Associates, 2025). Upon reviewing the ACD Tree Protection Plan (2025) and during a site visit, it is evident that this hedgerow comprises more than 5 woody species. As such, this hedgerow is classified as species rich as per the UKHab definition, and therefore this entry should be amended to 'species-rich hedgerow with trees' within the metric.

0.2km of species-rich native hedgerow has been added to the metric. Concern resolved, with thanks.

The illustrative masterplan (Finc Architects, 2025), the combined soft and hard landscaping plans (Finc Architects, 2025), and tree protection plans (ACD, 2025) show that vegetation in the form of scrub/hedgerow is present and is proposed to be reduced on the eastern border of the site within the red line boundary, however this has been omitted from the Phase 1 Habitat Map as presented within Appendix of the BNG report (Derek Finnie Associates, 2025). It is therefore also assumed this has not been included within the BNG metric calculation. Please can further comments be provided on why this

has not been included within the BNG Report / metric, despite its partial retention on other plans.

This does not appear to have been addressed.

### **Post-development Habitats**

There is a lack of detailed information provided on the proposed post-development on-site habitats. From looking at the illustrative masterplan (Finc Architects, 2025), the combined soft and hard landscaping plans (Finc Architects, 2025) and the individual tree entry in the post-development tabs in the metric, it is assumed that 59/60 small trees will be planted across the entirety of the site. Please can confirmation be provided on this number.

The correct number is assumed to be 60 without further confirmation. However, it is noted that many of the proposed trees are on top of existing vegetation, including hedgerows with mature trees. Note that all hedgerows on-site are classified as 'with trees', and therefore tree planting in hedgerows should only count towards enhancement of the hedgerow to good condition. Further information is therefore requested on the overall number of individual trees to be planted, and their feasibility relating to management and enhancements if within existing vegetation.

There are also proposed ornamental hedgerows and shrub, native shrub planting and swales within these plans outside of private gardens that have not been accounted for with the BNG calculation.

This has not been included.

Please remove 'herbicide application' from point 8 of the general maintenance on the Planting Schedule and Notes (Finc Architects, 2025).

This has not been addressed.

### **Design and Layout**

There is concern regarding the layout of site, specifically in the south / south-east of the site whereby the dwelling gardens are within RPAs of mature trees (whereby some are already subject to existing pressure from development on one side), and appear to be very close to the ditch, which is to be used as part of the drainage strategy. Any future outbuildings or patios that involve ground works or compaction of the soil may cause damage to the roots of these trees that can affect their condition and survivability. As such, there are concerns over the certainty of retention. The HDC Arboricultural Officer should be consulted for their comment.

The layout has been amended to respect the riparian zone of the ditch. Further comment should be sought from the HDC Arboricultural Officer regarding the layout amendments on tree RPAs.

### **ANY RECOMMENDED CONDITIONS:**

If minded to approve:

*Informative-*

Scenario 1: BNG Required

*Condition-*

**Habitat Management and Monitoring Plan**

Pre-commencement condition:

- 1.1 The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the Biodiversity Gain Plan and including:
- (a) a non-technical summary;
  - (b) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the Biodiversity Gain Plan; and
  - (c) the management measures to maintain habitat in accordance with the Biodiversity Gain Plan from the completion of development.
- has been submitted to, and approved in writing by, the local planning authority.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 and Policy 31 of the Horsham District Planning Framework (2015).

Regulatory Condition:

- 1.2 The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Any proposed or retained planting, which within a period of 5 years after the completion of development, dies, is removed, or becomes seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 and Policy 31 of the Horsham District Planning Framework (2015).

<b>NAME:</b>	Linsey King Ecology Officer (Planning)
<b>DEPARTMENT:</b>	Strategic Planning - Specialists
<b>DATE:</b>	08/07/25 <a href="#">18/11/25</a>