

Job Name: Partridge Green / Ref DC/24/1699
Date: 6th May 2025
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Subject: Technical Response – Horsham District Council Consultation (16/04/25 – 2nd comments)

Please find below the comments from HDC consultation and the responses provided. This should be read alongside the updated BNG report, updated 06/05/2025.

Further information relating to the hedgerow classifications are required prior to a grant of planning permission. The suggested amendments would result in the development not reaching the 10% BNG requirement in the hedgerow module. In the absence of this information, I recommend refusing the application as the baseline assessment is considered incorrect. Also note that comments/amendments in response to concerns on habitats for protected species, strategic significance and species mixes does not appear to be provided. Amendments and additions to the HMMP will need to be made prior to signing of any legal agreement.

The hedgerow classification was over simplified. However, the BNG report and metric has been update to reflect this. As the southern hedgerow, which is associated with a ditch, will not be impacted or lost. The section where the cycle path is to proposed does not support the southern ditch, and the cycle path will pass through an existing gated feature. As such, the southern hedgerow with ditch, was over estimated. This has now been changed to reflect this. The linear BNG has recalculated and a net increase in linear / hedgerow features has been obtained.

*Confirmation is requested as to how the classification of native hedgerow was arrived at for the baseline, as opposed to species-rich native hedgerow (and **species-rich native hedgerow associated with bank or ditch**, as Para 3.10 of the BNG report states 'a dry ditch was also present along both hedgerows 5 and 6 within the development area'), with reference to the UKHab classification descriptions.*

This has now been updated.

*This does not appear to have been addressed – this must be commented on prior to determination, because misclassification of these hedgerows will affect the BNG calculation, and result in the 10% in the hedgerow module not being met. This concern has been raised because all hedgerows recorded have at least 5 woody species present (as listed under Schedule 3 of The Hedgerow Regulations 1997), as presented in Table 3 of the BNG Report. **In***

the absence of these comments, it is considered the baseline habitats have been incorrectly classified, and in this instance the metric is considered incorrectly completed.

This has now been addressed.

It is not clear whether some habitat creation or enhancements are being used for mitigation or compensation purposes for protected species. Please can this be clarified, and if so, this should be detailed in the metric next to the relevant habitat entries so HDC can be assured that these efforts only count towards no net loss. This does not appear to be commented on.

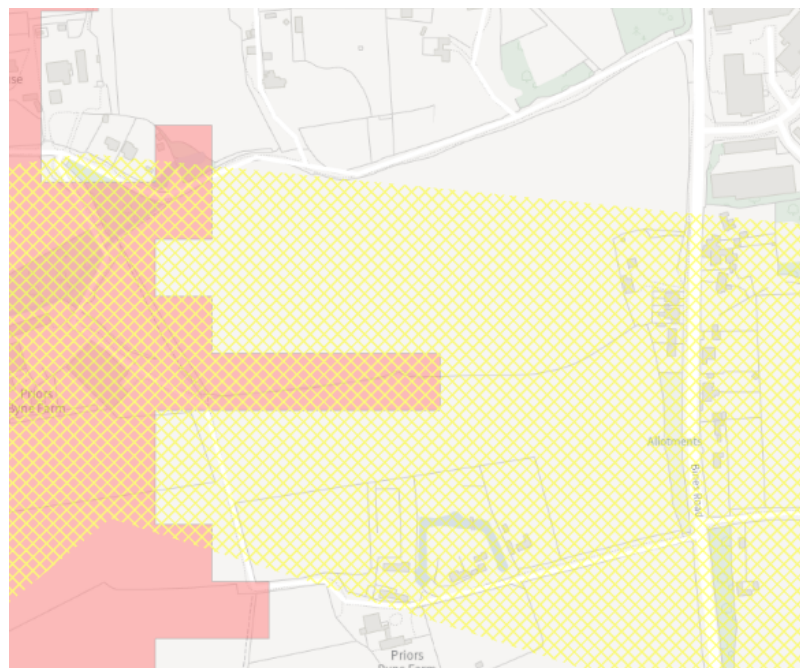
The site supported common reptiles around the edges of the site. The survey area was larger than the submitted red line, as can be seen below. The majority of reptiles identified are located to the north western aspect of the site. Low numbers are located within the application area and are associated with the hedgerows and the field margins. These are not significant areas of habitat, and, as the hedgerows are being retained within the site and the hedgerows are to be protected by tree protection fencing, impacts are considered minimal.



The extent of habitat which supports reptiles is limited and largely retained. There are no proposed compensation habitats proposed.

With regards to bats, trees and hedgerows are being retained.

*The site falls partially within the Wilder Horsham District Nature Recovery Network (WHD NRN). In the absence of a published Local Nature Recovery Strategy for West Sussex, any habitats of biodiversity value greater than zero as calculated by the metric are considered as having medium strategic significance if they lie within the WHD NRN. Therefore, please can the strategic significance for baseline and post-intervention habitats be amended to reflect this. **Not addressed.***



The site falls within the yellow area as provided by the HDC. If all of the baseline habitats and all of the natural habitats (i.e. aside from buildings, hardstanding and gardens), then the baseline habitats would equate to 23.07 units and post development habitats would be 22.50 and retained units 5.05, equating to 19.43% net gain.

With regards to hedgerows, the baseline hedgerow units equates to 14.44, with 14.28 hedgerow baseline units retained. In terms of new hedgerow creation, this would equate to an additional 3.58 units, resulting in a 22.95% net gain. This is not significantly different from the previously submitted metric. This can be altered within the metric if required

A larger variety of species should be incorporated into the landscape plans. As per the Landscape Strategy Plan, three native tree species, three native thicket species and two native hedgerow species is considered low. It is recommended that a further two species (minimum) are incorporated into the hedgerows, for example dogwood

(Cornus sanguinea), blackthorn (Prunus spinosa), elder (Sambucus nigra), spindle (Euonymus europaeus) or wild privet (Ligustrum vulgare) could be included. This will ensure a good quality native hedgerow, and a higher variety of species will provide a buffer to any failing plants. These species can also be incorporated into the mixed scrub / thicket habitats. The proportions of the species should also be provided. The grassland planting will also require a greater diversity of species, including along the margins of the hedgerows and around the SuDS and swales – see meadow mixtures for wet soils. Does not appear to be addressed. This is particularly important for the proposed species-rich native hedgerow, which requires a minimum of 5 woody species, and criterion A of mixed scrub which requires a minimum of 3 woody species.

Species rich native hedgerows, with 5 species, have been recommended. Meadow mix for wet soils have also been recommended. The details can be conditioned. However, it is considered that the species mixtures will be detailed.

HMMP

1. *A draft HMMP has not been submitted with this application, as required on the local validation list. Information on what condition assessment criteria are to be targeted to meet the proposed conditions of the habitats to be created or enhanced is required prior to determination, to assure HDC that the habitat enhancements are feasible and achievable within 30 years.*

Resolved, with thanks. The following comments will need to be addressed prior to signing of a legal agreement.

Note that Para 5.9 states 'all arisings will be removed from site, immediately after cutting' which conflicts with Para 5.7. Please can this be removed or clarified that this is only the case during the first year as per Para 5.6. (see also Para 6.9)

Para 8.1 states that the trees need to achieve at least a poor condition within 30 years, please can this be updated to instead say 'moderate'. The Criteria targeted in Table 1 and Table 11 will also require amendment.

Watering frequency beyond the first two weeks should be specified and included within the tables.

2. *Dust sheets should also be installed on the Heras fencing, to protect retained hedgerows and reptile refuge areas from dust pollution.*

If minded to approve, the BNG proposals are considered 'Significant on-site BNG' and will therefore require a S106 legal agreement to secure for 30 years. Monitoring reports will need to be submitted to HDC in Years 1,2,5,10,15,20,25 and 30.

Note, the draft HMMP states monitoring reports will be submitted to the council in years 5,10, and 30. This is not acceptable.

These changes have been made. The draft HMMP will be formalised once planning permission has been granted.