



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land To The North and South of Mercer Road Warnham
DESCRIPTION:	Redevelopment of the site to provide 304 residential units, parking, a retail unit, public car park, public open space, attenuation basins and landscaping
REFERENCE:	DC/25/0151
RECOMMENDATION:	Modification / More Information
SUMMARY OF COMMENTS & RECOMMENDATION: Several amendments are requested to ensure the conditions of habitats to be retained are protected and to assure the conditions of habitats to be created will be met. Further evidence and clarifications are requested with regards to baseline and post-intervention assessments. More information is required for the LMMP (HMMP), which will be required for the signing of any legal agreement.	
MAIN COMMENTS: The comments below relate solely to the BNG requirement for the above development. All other ecology matters are reviewed by Place Services. As the overall net change across all modules is 1.5, and the net gains include creation and enhancements of habitats of medium distinctiveness, this qualifies as significant on-site BNG and will therefore require a legal agreement to secure the on-site BNG for 30 years. Monitoring reports will need to be submitted to HDC in years 1,2,5,10,15,20,25 and 30. Ancient Woodland The buffer area for the ancient woodland to the north of the site appears to have open access to residents through multiple gaps in the hedgerows, with other neutral grassland and trees planted within it (see ACD Landscape Masterplan, 2020). There is currently no mechanism proposed to act as a deterrent to enter the ancient woodland. It is recommended that mixed scrub comprising thorny species is planted along the ancient woodland periphery (including on the eastern segment) to discourage access. Lowland Mixed Deciduous Woodland The woodland to the east of the site contains a veteran oak on the northern boundary, located on the north side of a small access track. Given the presence of this tree, and the woodland being priority habitat, it is recommended to restrict resident access by installing a post-and-rail fence around the periphery of the woodland (including the	

veteran tree). This is to ensure that these habitats are not subject to degradation as a result of trampling.

Trees and Hedgerows

Many hedgerows identified on site have been classified as 'native hedgerow'. However, several of these have a minimum of 5 woody species listed in Appendix 3 of the PEA (Ecology Partnership, 2024), which would otherwise classify them as species-rich native hedgerows. Please can clarification be sought on why these hedgerows have been entered as native hedgerow instead of species-rich native hedgerow within the metric.

H3 has been assigned as having moderation condition, both in the metric and condition assessment sheets within the BNG report (Ecology Partnership, 2024), however the condition assessment score adds up to a poor condition, as there are more than 5 failures and failures of both attributes in two functional groups. Amendment of this in the metric will increase the percentage net gain for the hedgerow module but has no effect on unit net change.

On the BNG Proposed Habitat map within the BNG Report it appears that planting of several small trees is proposed in areas marked as vegetated garden. Any trees within private gardens cannot be secured and therefore must be included within the vegetated garden entry and not counted separately. The same is applied to hedgerows that are part of a private garden. Please can confirmation be sought on whether these trees and hedgerows have been counted towards the BNG calculation.

Stream

The outputs from Cartographer are requested to evidence the baseline and post-intervention assessment.

Grassland

0.4021ha of other neutral grassland to reach 'poor condition' is proposed to the south of the site, and on road verges throughout the urban development, with species-rich flowering lawn mix managed as 'amenity grassland'. 0.1119ha of modified grassland to reach 'poor condition' is proposed in 'areas of open space and grass verges'.

Within the soft landscaping management and maintenance plan (ACD, 2024), these are to be managed in the same way. I therefore question whether 'other neutral grassland' is appropriate. These areas should be changed to modified grassland.

3.9997ha of other neutral grassland to reach 'moderate condition' is proposed 'around the site boundaries sensitively managed for wildlife and biodiversity'. From looking at the post-development habitat map in the BNG report, this is almost the rest of the green space in the site (orange colouring on the map below, Appendix 2 of BNG Report).

Appendix 2: Proposed Masterplan UKHab Classification



I have concerns as to the level of damage that potential recreational use may have on these areas, particularly in the open space areas surrounding the wooded stream, priority woodland and in the ancient woodland buffer area where clearly mown pathways, post-and-rail fencing / green barriers and signage are absent. It is my opinion that not enough modified grassland / amenity area such as that in the central island of the site (yellow colouring on the map above) is provided to alleviate this pressure on areas of other neutral grassland (sewn for biodiversity purposes). I also believe, given their open space nature and close proximity to the dwellings, these areas will be used recreationally, and I therefore question whether Criterion A (essential for other neutral grassland to reach moderate condition) will be met.

The area of modified grassland in the central 'island' of the site is very small. The immediate surrounding area is marked as other neutral grassland to reach moderate condition. It is considered probable that the surrounding areas of the allocated modified grassland for the open space area will also be used recreationally, and it is therefore advised that at least half of this island is sewn as modified grassland and dedicated to recreation.

Reaching 10%

Para 3.16 of the BNG Report states that 'offsite credits will be required for purchase to ensure a 10% net gain in habitat units is reached and that trading summaries will be met'. Please can confirmation be sought as to whether the applicant intends to purchase habitat bank units from the local market, or purchase of statutory credits from the national scheme. If the latter, as per government guidance, the applicant will need to provide evidence that 3 other local or national suppliers, habitat banks or trading websites have been approached, and that insufficient off-site options are available in England.

Soft landscaping management and maintenance plan (LMMP)

It is strongly recommended that tree and hedgerow species to be planted in areas near to ecologically sensitive or important habitats (i.e., within the ancient woodland buffer areas, around the priority woodland and stream) are native and of local character, to

avoid non-native species seeding in these habitats. Please amend the landscape plan to reflect this and incorporate into LMMP.

It is recommended that the top and subsoil layers of the fields that are currently modified grassland are inverted prior to sowing the seed to create other neutral grassland, to reduce the soil fertility. Arisings should remain in situ for up to 3 days before removal, to allow seeds to drop into the soil.

Removal of temporary fences planted within hedgerows has potential to damage the hedgerow, and therefore it is recommended against installing them.

Reference to how the proposed management methods will achieve the criteria as set out in the condition assessment criteria for each habitat should be included, and the trigger points for when remedial action is necessary. It is strongly advised to review Natural England's HMMP template (or accompanying checklist) to view the required information, for which the legal agreement will be pinned to.

The above is required prior to signing any legal agreement.

ANY RECOMMENDED CONDITIONS:

If minded to approve – Scenario 3: BNG Required + Irreplaceable Habitat

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	22/04/25