



## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Units 4 To 5 Redkiln Close Horsham West Sussex
<b>DESCRIPTION:</b>	Demolition of warehouse building and associated structures. Construction of two no self-contained warehouse units for storage (Class B8).
<b>REFERENCE:</b>	DC/25/0803
<b>RECOMMENDATION:</b>	Modification / More information

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

There is a proposed overall net loss of 0.48 units (-76.90%) in area habitats on-site. This results in a 0.54 unit deficit that needs to be offset. The BNG Feasibility Report (PJC, 2025) suggests off-site options should be explored, however the intent on how the 10% requirement will be met is requested. Furthermore, amendments need to be made in the metric/report for consistency. It is strongly advised to consult the HDC Arboricultural Officer with regards to impacts on existing trees.

### **MAIN COMMENTS:**

The comments below relate solely to the BNG requirement for the above application. All other ecology matters will be reviewed by Place Services. Please note that the comments below are not an exhaustive list of issues or concerns with the proposal.

As no on-site habitat creation or enhancement is proposed, there is no significant on-site BNG and therefore this application does not require a S106 legal agreement for BNG purposes. The BNG Feasibility Report (PJC, 2025) highlights there is a unit deficit of 0.54, and given the spatial constraints of the site, off-site solutions are recommended. However, further clarification is requested on the applicant's intent to meet the 10% requirement – whether this be through bespoke off-site habitat creation/enhancement or purchase of habitat bank units.

#### Baseline habitats

It is noted that works including severance of ivy on T1, reduction of tree crowns for T3 and G1, and mapped removal of trees T1, T2, and T7 (2x medium size trees, DBH greater than 30cm, and 1x large tree, DBH greater than 60cm) are proposed in the Arboricultural Impact Assessment (PJC, 2025).

It is noted that Section 3.2.1 of the BNG Feasibility Assessment (PJC, 2025) states '*Trees T1 and T7 are located on-site and are therefore included within the ecological baseline. Tree T2 is located within the adjacent ownership boundary but is anticipated to be felled and is therefore included within the ecological baseline. Trees T3-T6 are located within the adjacent ownership boundary and are anticipated to be retained and are therefore not included within the ecological baseline*'. It is also noted that Section 3.3.1

states '*a line of trees (G1) was recorded along the western site boundary as part of the Arboricultural survey. However, this treeline is located within the adjacent ownership boundary and is anticipated to be retained and is therefore not included within the ecological baseline*'.

Please can clarification be sought as to whether T7 is to be felled or not. If yes, please can the metric be amended to no individual trees being retained.

It is also advised to consult the HDC Arboricultural Officer to confirm trees T3-T6 and G1 will not be impacted by the development. If, however, the Arboricultural Officer believes that the condition of these trees will deteriorate because of the development, then I requested to be reconsulted to review the BNG assessment.

#### Condition Assessment

Modified grassland at baseline has been inputted as being in moderate condition within the metric. However, the condition assessment sheets in Appendix 3 of the BNG Feasibility Assessment (PJC, 2025) states that this grassland habitat failed Criterion A, which automatically makes this habitat poor condition. The condition assessments for trees T1, T2 and T7 all state that these trees pass 5x criteria, and as such these are considered in good condition. However, the entry in the metric states these are in moderate condition. Please can these discrepancies be rectified, and the appropriate document amended.

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

*Informative:*

Scenario 1: BNG Required.

<b>NAME:</b>	Linsey King Ecology Officer (Planning)
<b>DEPARTMENT:</b>	Strategic Planning - Specialists
<b>DATE:</b>	17/06/25