



## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Land East of Mousdell Close Rectory Lane Ashington RH20 3GS
<b>DESCRIPTION:</b>	Erection of 74 dwellings with associated access, parking and landscaping
<b>REFERENCE:</b>	DC/25/1327
<b>RECOMMENDATION:</b>	Objection <a href="#">More information</a> No objection (more information/modifications required to discharge condition)

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

The further amendments and information are welcome, and many issues have been resolved. I therefore do not raise any objections to the proposal, however a few points relating to the DBH of the largest stem of T42 and amendments to the HMMP and watercourse module of the metric are requested upon submitting a Biodiversity Gain Plan and accompanying metric to discharge the general biodiversity gain condition. Further clarification is requested on which ditch the outfall of the drainage pipes is connecting to.

The submitted metric now demonstrates that the development will have a -67.59% - 66.20% net loss (-9.31 units) in area habitats, a 29.35% net gain (+0.46 units) in hedgerows, and a 49.02% net gain (+0.22 units) in watercourses. [Further information and potential modification to the layout is requested in line with the HDC Arboricultural Officer comments with regards to impacts on trees/habitats.](#)

The application has not met the national minimum validation requirements and is therefore invalid, and a thorough review of the BNG baseline assessment and calculation to demonstrate that a 10% BNG requirement will be achieved, cannot be made. Therefore, this must be provided prior to grant of planning permission to overcome the recommended objection.

### **MAIN COMMENTS:**

The comments below relate solely to the BNG proposal within the above application. Note that these comments are not exhaustive. All other ecology matters will be reviewed by Place Services and NatureSpace, where appropriate.

The baseline measurements and post-development habitat creation tabs for area habitat within the metric have been amended. Namely, the introduction of a bioswale (acting as an attenuation basin – note there is a habitat type for this in the metric), increased vegetated garden and reduced developed sealed surface, increase in modified grassland, more tree planting, and removal of introduced shrub creation.

It is noted that additional user comments regarding T42 have been provided, and it is claimed that given that T42 has a small DBH as per the metric user guide, this does not need to be counted. The multi-stem sycamore has a reported collective DBH of 89cm within the updated AIA. Please can the DBH of the largest stem be provided, to ascertain whether the stated small DBH is correct.

It also recognised that the ditch 'creation' is actually the wetting of an existing ditch. This approach is acceptable as per the metric user guide, as the area habitat (modified grassland) is already accounted for as lost to the development. However, as per the drainage strategy (Motion 2025, drawing no. 2504072-0501) an outfall headwall is proposed in the 'existing ditch'. From the drawings, it appears to be the off-site ditch, and therefore the change in encroachment (minor) will need accounting for (note this will affect the % gain for the watercourse module). Please refer to the metric user guide on how to do this. Note that if this outfall is going to the off-site ditch, then the feasibility of wetting the 'new' ditch is questioned, and further consideration will be required as to how this ditch will meet the definition as per the metric user guide.

It is noted that the HDC Arboricultural Officer has concerns with regards to the creation of a new ditch to the south of the site, running adjacent to the existing ditch off-site. They state that the ditch '*appears to intersect the RPAs of mature boundary trees associated with the adjacent woodland belt. No root investigation, hydrological assessment, or construction methodology appears to have been provided to demonstrate compliance with BS5837:2012, Section 7.7, which requires avoidance of root severance and ground disturbance. Excavation of a continuous ditch in this location poses a high risk of root damage and potential alteration of local hydrology, leading to long-term decline of the boundary trees. More information is needed on this aspect of the scheme.*' I agree with the need for further assessment, particularly as the woodland to the south is priority habitat and therefore has greater ecological value than other boundary vegetation.

I also agree with the HDC Arboricultural Officer with regards to many of the private gardens being situated within the RPAs.

With the above in mind, the retention of these habitats is therefore uncertain, and if potential decline cannot be ruled out either by further assessments or modification of the layout, their loss or deterioration in condition will need to be reflected within the metric.

Having discussed with the HDC Arboricultural Officer, we are now satisfied that with the removal of permitted development rights concerning the creation of hard surfaces in the gardens of properties with tree RPAs, the retention of these trees can be assured.

In addition, given the second ditch is already existing and the tree roots are likely already subject to periods of increased water, we are no longer of the view that there will be adverse hydrological impacts on the retained woodland trees.

1.1 A Statutory Biodiversity Metric in its original format has not been provided with the application and therefore it does not meet the national minimum validation requirements. In the absence of this document, an objection has been recommended as a proper review of the BNG baseline assessment and further information cannot be made. It is not doubted that the metric has been completed to inform the Biodiversity Net Gain Statement (Lizard Landscape Design and Ecology, 2025), however HDC require submission of the metric prior to grant of planning permission.

**A metric has been submitted. Concern resolved, with thanks.**

1.2 Section 3.10 of the BNG Statement suggests that the metric calculation demonstrates that the development will have a -67.12% net loss (-9.11 units) in area habitat, a 29.35% net gain (+0.46 units) in hedgerows, and a 49.02% net gain (+0.22 units) in watercourses. The proposal includes delivery of habitats of medium

distinctiveness within the hedgerow and watercourse modules (which both demonstrate a net gain), and therefore as per HDC's definition this is considered significant on-site BNG. As such, if minded to approve, a S106 legal agreement will be required to secure the BNG, and monitoring reports will be required typically in years 1,2,5,10,15,20,25 and 30. It has been suggested that the intent to reach the minimum 10% net gain in area habitats is to purchase the unit deficit from a local habitat bank.

**Baseline**

1.3 As the site has recently been cleared, the ecologist has used on-site indicators and historical aerial imagery to determine the baseline prior to this clearance, as per habitat degradation rules. The baseline assessment with regards to habitat type and condition is agreed.

1.4 It is noted that within the Ecological Impact Assessment (Lizard Landscape Design and Ecology, 2025), section 5.4.2 states that the proposed site access may result in the removal of tree T01 along the northern boundary. It is noted from the Arboricultural Impact Assessment and Method Statement (Lizard Landscape Design and Ecology, 2025) that T44 has been marked to be removed. Further confirmation is sought as to whether these trees are the same, or whether T01 is considered separate. Also note that T44 has a DBH of 79cm, and therefore as per the Biodiversity Metric User Guide, any medium trees (DBH >30cm) or larger that are due to be removed from hedgerows must be recorded separately as individual trees in the metric and marked as lost.

**Confirmation has been provided that T01 (oak) and T44 (willow) are separate, and T44 has now been entered within the baseline of the metric and marked as lost. Concern resolved, with thanks.**

**HMMP**

1.5 A full HMMP i.e., including species lists and proportions, management practices to achieve the proposed habitat types and conditions, risks, and remedial measures, will be required alongside the Biodiversity Gain Plan. HDC Legal Officers may ask for further information pertaining to the draft HMMP for the purposes of drafting any legal agreement.

1.6 The post-development habitat map should distinguish the modified grassland parcels that are to be of good and poor condition.

1.7 It is noted in section 5.6.2 of the EcIA that seed and fruit bearing shrub and tree species such as cherry, rowan, birch and crab apple should be selected within the scheme to provide a foraging resource for birds and invertebrates. These species are therefore expected in the forthcoming full HMMP. It is also advised to include a mix of plants for pollinators, including native night-scented flowering species for nocturnal invertebrates, thus also providing for foraging bats.

**Creation of individual trees is not present within the draft HMMP as submitted. All other comments still stand.**

**ANY RECOMMENDED CONDITIONS:**

If minded to approve:

*Informative -*

Scenario 1: BNG Required

<b>NAME:</b>	Linsey King Ecology Officer (Planning)
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<b>DEPARTMENT:</b>	Strategic Planning - Specialists
<b>DATE:</b>	25/09/2025 <a href="#"><u>27/10/2025</u></a> <a href="#"><u>17/12/2025</u></a>