HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land at Campsfield Linfield Close Southwater West Sussex
DESCRIPTION:	Outline application with all matters reserved except for access for up to 82 dwellings with vehicular and pedestrian accesses, public open space, noise mitigation measures, landscaping, foul and surface water drainage and associated works.
REFERENCE:	DC/25/0102
RECOMMENDATION:	More Information More Information / Modification

SUMMARY OF COMMENTS & RECOMMENDATION:

The BNG plan proposes a combined approach of delivering habitat creation and enhancements on-site and off-site. The metric calculations demonstrate there will be a -6.81% net loss in area habitats and a 24.29% net gain in hedgerow habitats on-site, and a 76.13% net gain in area habitats off-site. This results in an overall combined net gain of 17.71% for area habitats. Whilst the proposal is considered appropriate and feasible, concerns over additionality and double counting should be addressed prior to determination to prevent delay and/or refusal of the Biodiversity Gain.

The amendments and further clarifications are welcome. However, after closer inspection during a site visit, there are concerns with regards to ditches and misclassification of habitats on site. This requires a response prior to grant of planning permission.

MAIN COMMENTS:

The below comments relate solely to the BNG proposal within the above application.

The planning addendum responding to consultee comments and communicating amendments to the masterplan considering the updated surface water flood risk maps mentions installing a culvert over a ditch for access purposes. During my site visit, a lot of the ditches were inaccessible due to scrub growth. The ditch to the south appeared to be damp despite the week of warm weather, with occasional tufted hair grass and pendulous sedge lining the banks (species indicative of damp soil). The ditch to the north appears drier and has a lot of scrub intrusion and dry leaf litter, with less abundant tufted hair grass and pendulous sedge, with the highest abundance of these species being in the north-west of the site where this ditch joins the watercourse. This ditch appears much deeper and narrower than that of the southern ditch. At the time of the site visit, the water levels of the watercourse were low, and the ponds were dry, but the soil was damp underfoot. As there are no references to ditches on site in the ecology or

BNG report, I would invite further comments on whether this has been assessed during the field survey and the watercourse module of the metric considered.

The on-site BNG is considered significant on-site, and therefore will require a legal agreement to secure. Monitoring reports must be submitted to HDC typically in years 1,2,5,10,15,20,25 and 30. The off-site BNG will also require a legal agreement and registering on the national Biodiversity Gain Sites Register. It must then be allocated to the development, prior to submission of the Biodiversity Gain Plan required to discharge the 'general biodiversity gain condition'.

Baseline

Line of trees listed under Section 3 of the BNG Habitat Management and Monitoring Plan Report but mapped as w1f lowland mixed deciduous woodland (UKHab Map, Ecosupport, 2024). As the line of trees has been entered separately within the metric, please can this be mapped separately so its location within the site is clear.

The amendment is noted. However, during the site visit to assess the ditches, on closer inspection it was noted that there was a shrub layer to the habitat, with more than 1 mature tree. As such, this does not fall within the 'line of trees' classification as per UKHab, however, an 'ecologically valuable line of trees' or hedgerow with trees, minimum. Please also note the ditch comments above. As such, this should be amended to reflect the correct habitat classification.

Post-development

Discrepancy between Table 3 of the BNG HMMP Report (Ecosupport, 2024) and the metric. Table 3 needs correcting in that modified grassland to be created will reach moderate condition, and other woodland; broadleaved will reach moderate condition as per the metric entries. This must be consistent within the HMMP for the purposes of any legal agreement.

Amended, with thanks.

Off-site habitats at baseline include individual trees. These have been marked as retained, however these will no longer be individual trees post-intervention, and it is questioned as to whether there is a degree of double counting. I would recommend recording as lost – this does not hugely alter the overall unit net change or percentage for off-site.

Amended, with thanks. Off-site individual trees marked as lost as incorporated into off-site woodland planting.

This also applies to the on-site line of trees that appears to be incorporated into the on-site woodland planting. Recording this as lost will significantly alter the metric calculations.

Amended, with thanks. 0.703km of 0.915km baseline habitat is proposed to be retained, with the loss accounting for woodland planting. However, see above comments re habitat classification.

There are two hedgerow types entered within the metric for post-development habitat creation, however these have been mapped under a single key in the post-development UKHab map (BNG Management and Monitoring Plan, Ecosupport 2024). For the purposes of monitoring, we will need these mapped separately to ensure that we can apply appropriate monitoring measures within the legal agreement.

Amended, with thanks. A maintenance buffer may need to be implemented.

Additionality

The baselines for the metrics add up to a different number of units. For area (on-site and off-site combined), the total number of units for the metric including hazel dormouse mitigation habitat and ancient woodland buffer is 24.15, however the metric excluding these habitats has a baseline of 22.41 units. The former metric accounts for a larger area of modified grassland and other broadleaved woodland, whereas the latter metric excludes some of the baseline habitat claiming that it is dormouse habitat and within the ancient woodland buffer. The same is applied to the linear module of the metric, whereby one metric has a larger area of line of trees whilst the other has removed the area from the baseline that is considered dormouse habitat or within ancient woodland buffer. However, it is not understood why the baselines would be different when evidencing habitat created or enhanced is for mitigation/compensation purposes and therefore can only count to no net loss (i.e., 100%). In addition, the metric excluding such habitat from the habitat creation tabs for both area and linear modules still do not reach a 10% net gain (individually). I would invite some clear clarification on how the habitats proposed are additional, with the above in mind.

The further clarification and provision of maps is welcome. With the exclusion of the mixed scrub for ancient woodland buffer planting and woodland planting for dormouse compensation on-site from the overall metric, the proposal still meets a 10% uplift. As such, this concern is resolved, with thanks.

Habitat management

Details relating to watering method and frequency are missing.

This has been added for woodland planting only. This will also apply for planting of mixed scrub and hedgerows. It is recommended that watering frequency is entered within the schedule for during years of establishment, and then an increased frequency in periods of drought.

Herbicides should only be used when removing invasive non-native species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) or for other biosecurity purposes. Where manual hand-pulling of undesirable species is sufficient, this technique should be used before considering alternatives.

This is noted with thanks, for any other undesirable species removal, hand-pulling/manual techniques should be included within the HMMP.

It is discouraged to plant woodland trees in a linear sequence to avoid the appearance of a plantation woodland (like that for timber production). Random planting should be implemented to create a more semi-natural appearance, varying the structure and microclimates of the woodland, and providing opportunities for glades and natural regeneration.

Amended, with thanks.

ANY RECOMMENDED CONDITIONS:

If minded to approve – Scenario 1: BNG Required.

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	12/03/2025 02/05/2025