



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land North of Guildford Road Bucks Green Rudgwick West Sussex
DESCRIPTION:	Outline Planning Application for up to 90 no. residential dwellings (including 40% affordable) all matters to be reserved apart from access.
REFERENCE:	DC/25/1269
RECOMMENDATION:	Modification / More information
SUMMARY OF COMMENTS & RECOMMENDATION: <p>As it stands, the BNG metric calculation demonstrates that the development will have a 5.17% net gain (+0.81 units) in area habitats, and a 11.36% net gain (+0.56 units) in hedgerow habitats, and the applicant intends to achieve the 10% requirement for area habitats by purchasing the necessary unit deficit (0.75) from a habitat bank. However, amendments and clarifications are required with regards to the baseline assessment, and further information is requested regarding the post-development habitats. All baseline issues must be resolved prior to grant of planning permission, and it is advised all other concerns are addressed for the signing of the legal agreement.</p>	
MAIN COMMENTS: <p>The comments below relate 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/or NatureSpace, where appropriate.</p> <p>The BNG results in an overall unit change greater than 0.5, and the proposals include creation of habitats of a medium distinctiveness. Therefore, as per HDC's definition, this is considered significant on-site BNG and will therefore require an S106 legal agreement to secure. Monitoring reports will typically be required in years 1,2,5,10,15,20,25 and 30.</p> <p>Note that the biodiversity gain condition only applies to outline planning permissions (not reserved matters), and as such much of the BNG will need to be finalised within the biodiversity gain plan to discharge the condition.</p> <p><i>Baseline</i></p> <p>1.0 Section 3.13 of the Preliminary Ecological Appraisal (The Ecology Partnership, 2024) states that these are hedgerows with trees, however only species rich hedgerows has been entered into the metric. Please can this be amended to the</p>	

habitat 'species rich hedgerows with trees', also in accordance with Table 2 in the Biodiversity Net Gain Feasibility Assessment (The Ecology Partnership, 2025).

- 1.1 Section 3.16 of the PEA states that the number and size classes of individual trees (distinct from surrounding habitats and boundary features) on-site include 2x small, 9x medium and 3x large trees. However, this number of trees is not accounted for within the BNG assessment – going by the PEA statement, the equivalent hectareage should be 0.26ha, however 0.15ha has been inputted (presumably corresponding with Figure 3 in the BNG report showing 6x trees – size classes unknown). Please can this be amended or otherwise clarified.
- 1.2 It is stated in section 3.8 of the Ecological Impact Assessment (The Ecology Partnership, 2025) that it is understood that all trees would be retained as part of the proposed development. However, there are many Category U trees as mapped within the Arboricultural Impact Assessment (Aspect Arboriculture, 2025) that have been recommended for removal, however there is a medium tree (horse chestnut, T58) that is due to be removed, and a group of trees with the largest DBH recorded as 52cm, that is also down to be removed. Please can confirmation be sought on whether any of the trees as mentioned above (incl. Category U) with a DBH greater than 30cm are to be removed, and if so, please can these be accounted for separately in the baseline and marked as lost. It is noted that these trees are also near to the trees with bat roosting potential as listed within Table 3 in the PEA, and if any are to be removed, please can these be cross referenced with these trees to determine if further measures are required.
- 1.3 Additionally, the AIA highlights that many trees were removed as of September 2024. It is not apparent that these were done in accordance with any permission, and as such (if these trees had a likely DBH greater than 30cm), these trees if within the red line boundary should also be accounted for in the metric (and marked as lost) as per habitat degradation rules.

Post-development

- 2.0 It is noted that other neutral grassland is proposed in both poor and moderate condition on site within the BNG Assessment, with user comments in the metric stating that other neutral grassland in poor condition will be in the 'inner area' and 'flowering lawn', whilst other neutral grassland in moderate condition will be 'areas on perimeter of site' and 'SuDS and swale'. Please can the different condition habitats be distinctively mapped for the purposes of future monitoring. In instances where the grassland will be subject to high levels of disturbance from residential use, it is advised to assign these areas as modified grassland.
- 2.1 As per the Preliminary Drainage Strategy (Appendix A, Paul Basham Associated Ltd, 2025), an attenuation crate is proposed to be installed in the south of the site and appears to be very close to the retained hedgerow. Please can confirmation be sought as to whether impacts on this hedgerow will be avoided.
- 2.2 Further clarification is requested as to whether the proposed trees around the middle SuDS basin are to be within the hedgerow or adjacent to. If the former, these should not be counted separately and instead should be classed as species rich native hedgerow with trees within the metric.

HMMP

- 3.0 It is noted in section 2.3 of the draft Habitat Management and Monitoring Plan (The Ecology Partnership, 2025) it states, 'a monitoring report will be submitted to the council during years 5,10 and 30'. This is not considered acceptable, as HDC's legal agreements require monitoring reports in years 1,2,5,10,15,20,25 and 30.

- 3.1 Deer culling is deemed excessive for a residential development. Any tree guards used must be removed at an appropriate time, whereby it is still accessible to remove without damaging the scrub habitat.
- 3.2 Section 3.3 states that at least three criteria need to be met for mixed scrub to achieve good condition. This is incorrect, five criteria need to be passed for this condition.
- 3.3 Section 6.3 states that at least three criteria need to be met for orchard to achieve moderate condition. This is incorrect – of the bullet points listed, at least four criteria need to be passed.
- 3.4 Note that the specific target criteria for hedgerows to meet a moderate condition are not bullet pointed in the main body of the HMMP as per the other habitat types.
- 3.5 It is advised that the full HMMP comprises species compositions of habitats. As listed in section 4.4 of the dormouse survey report, hedgerows should include:
- Hazel
 - Field maple
 - Hawthorn
 - Holly
 - Hornbeam
 - Elder
 - Spindle
 - Beech
 - Dog rose
 - Wild cherry

Night scented flowers are also recommended for invertebrates, subsequently supporting foraging bats.

It is also recommended that hedgerow species favouring more damp soils are incorporated for the proposed hedgerows between the SuDS attenuation basins. This hedgerow should also connect to the existing hedgerow running along the southern boundary of the site.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative

Scenario 1 – BNG required.

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	23/09/2025