



HORSHAM DISTRICT COUNCIL CONSULTATION

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

SUMMARY OF COMMENTS & RECOMMENDATION:

With the welcomed metric amendments, the calculation now demonstrates that the development will have an overall net loss of 0.92 units (-100%) in area habitats on-site. This results in a 1.01 unit deficit. The applicant has confirmed that they intend to meet the 10% net gain through purchase of habitat bank units. I am satisfied that the development can meet their BNG requirement, and as such I do not object to this proposal. **However, it must be noted that in light of the HDC Arboricultural Officers comments dated 14th July 2025, if satisfactory amendments are not made to alleviate their concerns, and the Case Officer is minded to approve this application, then the loss of T3 must be accounted for in the metric. In which case, I request to be reconsulted to review any further amendments.**

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.

The applicant has confirmed that the intention to meet the 10% requirement is through purchase of habitat bank units, with ongoing discussions being had with habitat bank providers.

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.

The metric has been amended to include T1, T2, and T7 within one single entry, with the assumption these are all to be felled. Concern resolved, with thanks.

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.

It is noted that the HDC Arboricultural Officer raises concerns with the effective retention of T3 (1x large oak tree with TPO/0084 served 24/12/1963, DBH 75cm) with encroachment of the proposed replacement building within the root protection area. They raise the concern that '*the proposed root severance will remove essential structural and fibrous roots, potentially impacting the tree's stability and nutrient uptake. This cumulative impact will, over time, significantly diminish the tree's health and resilience, increasing the likelihood of decline or failure in the short to medium term*'. As such, **if the proposed building is not moved outside of the RPA of T3, and the Arboricultural Officer retains this view with submission of any new information, then the loss of this tree must be accounted for within the metric.**

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.

The above amendments have been made in the metric. Concern resolved, with thanks.

ANY RECOMMENDED CONDITIONS:

Informative:

Scenario 1: BNG Required.

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	17/06/25 <u>16/07/25</u>