



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land North of Little Slaughterford Chapel Road Barns Green West Sussex
DESCRIPTION:	Proposed development of 68 dwellings with vehicular and pedestrian accesses, public open space, hard and soft landscaping and associated works including supporting foul and surface water drainage works, and works to existing culverted watercourse on site.
REFERENCE:	DC/25/2057
RECOMMENDATION:	No objection (proposed modification prior to discharging the deemed condition) More information
SUMMARY OF COMMENTS & RECOMMENDATION: Generally, I am satisfied that the demonstrated net gains are appropriate, feasible and deliverable. A modification regarding the proposed grassland type in the surrounding areas of the LAP is still advised. – now received and accepted. New BNG figures – • 30.45% net gain (+2.20 units) 30.30% net gain (+2.19 units) in area habitat. • 17.67% net gain (+1.69 units) 19.58% net gain (+1.87 units) in hedgerows. • 104.06% net gain (+0.17 units) in watercourses. The changes result from partial retention of the eastern hedgerow, creation of short lengths of hedgerow adjacent to the de-culverted watercourse, and minor changes to area of grassland creation. However, further information pertaining to trees and the ancient woodland buffer (and any impacts) is required prior to signing a legal agreement and amendments/additions suggested.	
MAIN COMMENTS: The comments in this response relate solely to the BNG proposal as part of the above application. Note that the concerns highlighted below are not exhaustive. All other ecology matters will be reviewed by Place Services and NatureSpace, where appropriate. As it stands, the metric calculation demonstrates that the development will have a 43.54 32.29% net gain (+3.07 2.34 units) in area habitats, a 21.59 17.67% net gain (+2.07 1.69 units) in hedgerows, and a 121.74 104.06% net gain (+0.20 0.17 units) in	

~~watercourses.~~ As the overall net gain is greater than 0.5 units, as per HDC's definition this is considered significant on-site BNG and will therefore require a S106 legal agreement to secure. Monitoring reports will be expected to be submitted to HDC typically in years 1,2,5,10,15,20,25 and 30.

Baseline

It is noted within the Arboricultural Implications Assessment and Method Statement and associated Tree Protection Plan (Canopy Consultancy, 2025, drawing ref. 25-1907-TTP) that trees T80 and T81 will be removed to facilitate drainage works. However, there is no accompanying information pertaining to these trees, which is required to determine whether their losses need to be accounted for separately in the metric. Please can this information be sought.

The ecologist has confirmed that T80 has a small DBH, however T81 is medium DBH and therefore requires its removal accounted for separately in the metric. This has now been actioned – concern resolved, with thanks.

Post-development

The Preliminary Ecological Appraisal and the BNG Feasibility Report (The Ecology Partnership, 2025) both mention a 20m buffer zone for ancient woodland, whereas other documents refer to 15m. Please can the correct buffer zone be confirmed.

The ecologist has confirmed that the size of the buffer changes, and the range is 15-20m. This has now been presented as a range within the BNG report – concern resolved, with thanks.

It is understood that the entirety of the eastern hedgerow, which is a priority habitat in good condition, is to be lost to facilitate the de-culverting of a watercourse, and for the watercourse to be opened on-site. The loss is regrettable, and therefore it is preferred to retain sections of this hedgerow where possible in line with the mitigation hierarchy. Note that the hedgerow loss may have landscape implications.

It is stated in the technical response that due to site access, sightlines and stream de-culverting that there is no way that the hedgerow can be retained. It is at the discretion of the Case Officer as to whether this level of loss is acceptable.

A small section of the hedgerow is now proposed to be retained in the south-eastern corner. This amendment is welcome, however the loss of the remaining length (81m) of the hedgerow is undesirable.

It is recommended that a greater surrounding area of modified grassland is located around the LAP, to provide opportunity for informal recreational/sport play.

The ecologist states that the areas surrounding the LAP will be flowering lawns (i.e., other neutral grassland) managed to a short sward height which would be suitable for recreational play. This is not wholly agreed, as the appropriate UKHab definition (including >8sp per sqm) will need to be reached (which is generally achievable for areas subject to lighter disturbance in comparison). Larger unobstructed areas should be designated as modified grassland to allow for informal kickabout (etc.) where there are limited alternatives. It also does not seem practical to classify as other neutral grassland with the view to continuously scarify and re-seed to ensure it does not degrade to modified grassland. There is plenty of scope within the metric to allow for this provision and the southern area with designated mown pathways will retain the flowering lawn and wildflower meadow appeal. It will also reduce any likelihood of a legal agreement breach.

resolved

It is noted that some of the gardens are within existing tree RPAs on the southern hedgerow. Methods to reduce impact on ancient woodland resulting from increased PROW use via an introduced footpath connection through the buffer zone are also proposed. Therefore, the HDC Arboricultural Officer should be consulted to comment on certainty of retention of these trees and impacts on irreplaceable habitat. If the HDC Arboricultural Officer deems that the ancient woodland would deteriorate because of the development, I request to be reconsulted to determine whether a compensation strategy is needed.

The HDC Arboricultural Officer has broadly accepted the approach taken to avoid impacts on ancient woodland.

HMMP

An outline HMMP has been provided to support the BNG proposal, which is welcome. A final full HMMP will be required to discharge the biodiversity gain condition and is needed for the legal agreement. This may be in combination with the Landscape Management Plan to ensure consistency. It is advised to include detail pertaining to project information, appropriate post-development habitat maps, roles and responsibilities, areas of habitat retention, habitat target conditions and criteria to be met, species composition, management prescriptions to achieve the condition criteria, risk register and remedial measures, and monitoring strategy.

It is requested that botanical species listed in the Bat Activity Report (The Ecology Partnership, 2025) to enhance the site for bats are incorporated within the plans.

The other neutral grassland (wildflower grassland incl. SUDS) and mixed scrub needs to pass a minimum of 4 criteria (including Criterion A for ONG) to achieve moderate condition. Please can this be amended in Table 10, 12 and 14 of the BNG Feasibility Report.

The above comment is in error, only grassland of low distinctiveness needs to meet 4 target criteria to achieve moderate condition. 3 criteria will suffice (incl. Criterion A) for moderate condition for both habitat types.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative

Scenario 1: BNG Required

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	27/01/26 27/04/26 30/04/2026 05/06/26