HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land East of Oaklands Henfield Road Cowfold West Sussex
DESCRIPTION:	Outline planning application for a phased development of approximately 40 residential dwellings, vehicular access, car parking, landscaping, open space and other associated works and infrastructure. All matters reserved except for access.
REFERENCE:	DC/26/0913
RECOMMENDATION:	Modification / More information

SUMMARY OF COMMENTS & RECOMMENDATION:

Currently, the submitted metric demonstrates that the development will have a 21.47% net gain (+2.04 units) in area habitat, a 30.48% net gain (+1.60 units) in hedgerows, and a 14.94% net gain (+0.54 units) in watercourses. However, further information is requested prior to grant of planning permission with regards to ~~potential veteran tree status~~, clarification on baseline hedgerow classification, and river condition assessment methodology~~. A draft HMMP has not been submitted, and~~ further information is requested with regards to target condition criterions for post-development habitats.

Additional comments are made relating to river condition assessment, post-development habitats, tree removals, and strategic significance, to be addressed at Reserved Matters.

MAIN COMMENTS:

The below comments relate primarily to the Biodiversity Net Gain requirement for the above application. Note, these comments are not exhaustive. All other ecology matters will be reviewed by Place Services and/or NatureSpace where necessary.

The submitted metric demonstrates that the development will have a ~~23.87%~~ 21.47% net gain (~~+2.09~~ +2.04 units) in area habitat, a 30.48% net gain (+1.60 units) in hedgerows, and a 14.94% net gain (+0.54 units) in watercourses. As per HDCs definition, this is considered significant on-site BNG and therefore will require a legal agreement to secure and an upfront monitoring fee. Monitoring reports will typically need to be submitted to HDC in years 1,2,5,10,15,20,25 and 30. However note, amendments are required which are likely to change the calculated figures in the metric.

As this is development is proposed as phase, an Overall Biodiversity Gain Plan (OBGP) will be required to discharge the deemed pre-commencement biodiversity gain condition. The OBGP must provide details on how the development meets the 10% BNG requirement overall. Prior to commencement of each phase, a Phased Biodiversity Gain

Plan (PBGP) must be submitted and approved by HDC. The PBPG must detail how the BNG delivery within that phase contributes towards the overall 10%.

It is noted that the HDC Arboricultural Officers consultation response states that tree T21 (within the submitted tree survey) is of an age, size and condition with visible signs of branch death and hollowing that warrants consideration as a veteran tree. As such further comment is required with regards to why this was not assigned as an irreplaceable habitat within the metric. Please note that if the certainty of the veteran tree's retention in its current condition cannot be assured, then a bespoke compensation strategy will be required which cannot count towards BNG. An overall strategy should be forthcoming prior to grant of planning permission.

This has been confirmed as having veteran tree status, and the development design has been modified to account for a greater RPA. It is advised to seek Arboricultural comment as to certainty of retention of this tree considering the updated layout and associated land uses.

Baseline

1.0 Sections 5.29 and 5.30 of the PEA states that more than 5x woody species as listed under the Hedgerow Regulations 1997 are present within the native hedgerow with trees and native hedgerows with trees associated with a ditch across the site. As such, clarification is requested on why this has not been classified as species-rich within the metric.

Does not appear to be addressed.

1.1 It is understood that further trees have been added to the metric considering the need for several removals to facilitate the access. The updated baseline habitat map comprises 4x small, 5x medium, 1x large and 1x very large trees, equating to a total hectarage of 0.2108. However, the hectarage presented in the updated metric is approx. 0.283. Please can the difference be further explained – user comments in the metric will suffice.

Post-development

2.0 It is requested that the change in river condition assessment indicators from pre- to post- intervention are provided to demonstrate the change in RCA indicator B5 (bank top managed ground cover). The methodology and location of the MoRPH surveys have not been provided, which is also requested to support the assessment.

Does not appear to be addressed.

2.1 The proposed drainage strategy plan within the Flood Risk Assessment (see GTA Civils and Transport, 2026 drawing no. 14136/1100 Rev. P01) illustrates drainage from the swales to the stream which includes installation of headwalls within the stream. This installation will need to be accounted for in the metric and river condition assessment with regards to increased watercourse encroachment.

Does not appear to be addressed.

2.2 It is understood that the north-eastern parcel is to be designated as a recreational area and sewn as modified grassland to reach a good condition. Given the likely high disturbance this area will receive, it is questioned whether a good condition is achievable, particularly with regards to Criterions A,B,D and E. It is therefore advised to downgrade this to reach a poor condition to avoid a potential breach of legal agreement. As the net gain percentage exceeds the 10% minimum for area habitat, there is flexibility to do this. The same concern is raised for the proposed other neutral grassland

in moderate condition to the south of the site, and further information is requested as to whether this area will have public access as 'informal open space', and if so, whether mown pathways will be implemented to reduce damage from wide roaming.

Does not appear to be addressed.

2.3 It is noted in Section 3.1 of the Arboricultural Impact Assessment (Ramsay & Co Landscape Architecture, 2026 Rev 02) that existing trees are proposed to be retained, and vegetation loss is limited to some shrubs and small specimens, however that the line of poplars may need to be considered for removal. Please note that if these need to be removed, this must be accounted for in the metric.

Does not appear to be addressed.

2.4 The HDC Arboricultural Officer concerns with regards to retention of the mature TPO oak tree at the access point from the A281 are also noted, and thus any deterioration or loss to this tree (and others, including any trees with a DBH of more than 30cm within linear habitats) resulting from the proposal must also be accounted for within the metric.

It has been agreed that this tree would require removal to facilitate access to the site, in addition to some small trees to the south of the proposed access.

It appears that 1x large and 3x small trees are now proposed to be lost to the development, equating to 0.0489ha. However, the metric accounts for a loss of approx. 0.078ha. Please can these differences be further explained.

2.5 Please note that any non-native tree species must be restricted to the developed residential area within the site, and only native tree species should be used around the periphery and adjacent to retained habitats.

2.6 Please note that planting of new trees in the veteran tree RPA is strongly discouraged and should be relocated elsewhere within the site.

2.7 It is recommended that new species-rich native hedgerows are connected to retained vegetation to enhance green corridors across the site. Please see an example below where the hedgerow could join up to the existing central belt.



Strategic significance

3.0 The southern portion of the site falls within the West Sussex Local Nature Recovery Strategy. The priorities highlighted include creation of new woodland and creation of buffer strips along rivers and streams (with a small portion of the site highlighted as a priority for renaturalising rivers and floodplains).

3.1 The proposed watercourse riparian zone enhancement qualifies as strategically significant under the LNRS priorities and therefore can be afforded the uplift within the metric. However, as currently submitted, the metric has assigned high strategic significance at both baseline and post-development. This must be amended as all baseline habitats are low strategic significance by default – this allows the calculation of an uplift within the metric.

Does not appear to be addressed.

3.2 It is encouraged to incorporate woodland planting in the southern portion of the site to further align with the highlighted LNRS priorities.

HMMP

~~4.0 It does not appear that a draft HMMP has been submitted in accordance with HDCs local validation list. This is requested to ascertain whether the proposed habitat creations and enhancements are feasible. At a minimum, further information is requested as to what condition criterions are to be targeted for the habitats, and high-level information on the predicted management methods required to achieve them.~~

4.1 When submitting the HMMP, it is advised to review Natural England's HMMP template, companion document, and checklist, for expected content. It is encouraged to incorporate botanical species in the mix that provide benefits to protected and priority species identified to be or likely to be utilising the site. It is advised to also incorporate accessible management strips between the residential back gardens and retained or proposed vegetation. Management prescriptions are expected to be more detailed.

4.2 Please note, as created modified grassland is proposed to achieve both good and poor condition, it is recommended to clearly mark on a map these areas to avoid mismanagement, and detail prescriptions that apply to poor and good, respectively. Modified grassland still needs to meet the habitat classification. Please note that regular mowing of modified grassland may hinder achievement of condition criterion A.

4.3 Herbicide use is discouraged and should only be used as a last resort unless eradicating invasive non-native species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Please can words be added to reflect this.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative –

Scenario 2: BNG Required + Phased Development

Further wording from Scenario 3 with regards to irreplaceable habitat may also be added.

NAME:	Linsey King Ecology Officer (Planning)

DEPARTMENT:	Strategic Planning - Specialists
DATE:	13/08/2026 13/11/2026