



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Thakeham Mushrooms Storrington Road Thakeham Pulborough
DESCRIPTION:	Demolition of existing buildings and the redevelopment of the site to provide 150 dwellings, including affordable housing, land for the community land trust, works to public right of way and associated landscaping, open space and infrastructure.
REFERENCE:	DC/26/0266
RECOMMENDATION:	Modification / More information No objection / More information Objection
SUMMARY OF COMMENTS & RECOMMENDATION: It is noted that the red line boundary has been extended to incorporate a large expanse of open space to the west of the site, increasing the site area from 13.23ha to 25.72ha. Please note that BNG applies to everything within the red line boundary. As no further baseline assessment for this additional area has been provided (as a minimum), I therefore change my recommendation to an objection to the planning application as amended. Many of the comments have been addressed, which is positive. Comments relating to the open space designated for recreation (point 2.6), and discrepancies between documents (point 2.0), do not appear to be addressed and thus are outstanding. It is advised to seek further information on these points. A draft HMMP has not been provided as per HDCs local validation, and it is at the Case Officers discretion as to whether one is requested to assure HDC of the delivery of the BNG proposal (point 3.0). The biodiversity metric demonstrates that the development will have an overall 38.97% 45.23% net gain (+13.03 +15.44 units) in area habitat and an 87.61% 97.39% net gain (+4.76 +4.65 units) in hedgerows. Clarification pertaining to the baseline is requested, and further information and amendments are sought relating to the post-development habitats. It does not appear that a draft HMMP or information relating to target conditions has been provided.	
MAIN COMMENTS:	

The comments below relate solely to the BNG proposed in the above application. The comments are not considered exhaustive. All other ecology matters will be reviewed by Place Services and NatureSpace, where appropriate.

As currently submitted, the biodiversity metric demonstrates that the development will have an overall 38.97% net gain (+13.03 units) in area habitat and an 87.61% net gain (+4.76 units) in hedgerows. As per HDC's definition, the proposal is considered significant on-site BNG and therefore, if minded to approve, a S106 legal agreement is required to secure the BNG and monitoring reports will need to be submitted to HDC typically in years 1,2,5,10,15,20,25 and 30.

Baseline

Willow scrub

1.0 I largely agree with the baseline assessment made of the site. However, I request clarification on why willow scrub has not been recorded in the metric or on the UKHab baseline map despite its mention in Section 4.12 of the Ecological Appraisal (Aspect Ecology, 2026).

The ecologist has confirmed that the willow scrub is no longer located within the developments red line boundary. Therefore, this concern is resolved.

Grassland condition assessments

1.1 A parcel of modified grassland, AG3a, is present on the Pre-Development Habitat Mapping (drawing no. 6612/BNG1, Biodiversity Net Gain Assessment, Aspect Ecology 2026), however has not mention in the condition assessment sheets. Please can further clarity be sought on this. It is also noted that grassland parcel G5 and G6 are not present within Table 3.1 of the BNG Assessment.

The ecologist clarifies that AG3a and b was included within the column for AG1-4 in the condition assessment sheets, and AG3c was separated as it failed an additional condition criterion. Grassland parcels G5 and G6 were removed in previous iterations due to red line boundary changes, however, are now included within the red line boundary and metric calculation. The BNG report has since been updated accordingly. Concern resolved, with thanks.

Hedgerows

1.2 H1 within the metric is classified as species-rich native hedgerow with trees, however conditions E1 and E2 in the condition assessment sheets have not been assessed. This hedgerow is labelled as a species-rich native hedgerow (no trees) on the Pre-development Habitat Mapping. Please can further clarity be sought on this.

The classification 'with trees' was in error, and the metric entry has been amended and the two trees along the hedgerow have been counted separately within the metric, with one marked as lost to the development. Concern resolved, with thanks.

1.3 An additional tree line (TL2) is detailed within the condition assessment sheets, however does not appear on the Pre-development Habitat Mapping or within the metric. Please can further clarity be sought on this.

This tree line is not located within the red line boundary for the Phase 1 site. Concern resolved, with thanks.

Post-development

2.0 There are discrepancies between the landscape masterplan (Pegasus, 2026), BNG post-development habitat plan (Aspect, 2026), and site layout plan (Pegasus, 2026), with the former two being consistent with each other.

Does not appear to be addressed.

Trees

2.1 The loss of 4x small trees (0.0163ha) and 6x large trees (0.2199ha) has been entered into the metric.

The metric has been amended to reflect 3/4 small trees (incl. T13) and 2 medium trees (incl. T2, see point 2.3 below) will be lost to the development, and 7x large trees (incl. T3, see point 2.4 below) are to be retained.

2.2 The line of trees (TL1) to the south of the site is marked as retained within the metric, however these are marked as removed in the Tree Protection Plan (drawing no. 2142-KC-XX-YTREE-TPP01RevC, Keen Consultants 2023). Please can further information be provided on whether the trees marked as lost account for these trees (see TG1 in condition assessment sheets). If not, please can this be amended within the metric accordingly.

The loss of the eastern section of TL1 has been amended within the metric. Concern resolved, with thanks. Although please note that the Tree Protection Plan depicts more than half the length of TL1 for removal, and this should therefore be checked prior to discharging the deemed biodiversity gain condition.

2.3 One Medium size ash tree (DBH 50cm) is proposed to be removed from the hedgerow (H3) (see the Tree Protection Plan). This is present within the condition assessment sheets as in Appendix 6612 of the BNG Report as T2, being in moderate condition. In line with the metric user guide, please can the medium tree be added to the baseline and marked as lost.

This has been actioned. Concern resolved, with thanks.

2.4 The condition assessment sheets also detail a large tree (T3) in H1 for removal, which does not appear to be included in the baseline assessment. Please can this be added.

This appears to now be retained. Concern resolved, with thanks.

Open mosaic habitat

2.5 Given the scarcity (particularly in the southeast) and high cost of OMH units on the BNG market, HDC will need further assurance that this is deliverable and will meet the JNCC priority habitat description. Further information is requested on why this habitat cannot be retained.

The ecologist provides reasoning that there cannot be any certainty that adjacent removal of hardstanding will not damage or destroy the on-site OMH.

Furthermore, the current proposal of a 'butterfly bank' will not be sufficient as currently described, and it is recommended that any proposed OMH accord with the guidance set out in the West Midlands Combined Authority 'Brownfield Habitats and Biodiversity Net Gain' note to meet the priority habitat criteria. Specifically, we want to ensure that the soil will remain nutrient poor, and soil substrates, aspects, topography and hydrology will be varied across the habitat to ensure structural diversity and a mosaic of habitats with different microclimates. No topsoil should be introduced to this area, and it is likely that the upper layer of existing soil will need to be removed and replaced with waste materials, or other friable/aggregate material if the former is not possible. A detailed

drawing and material and species composition alongside long-term management will be expected in any forthcoming HMMP.

An example design has been provided. Further information will be required on how to prevent the OMH being colonised by adjacent wildflower planting, alongside the request for a detailed OMH management plan within any forthcoming HMMP.

Confirmation is also requested on whether screening or fencing will be implemented along the western boundary to ensure the larger off-site OMH parcel is not subject to heavy recreation.

Confirmation has been provided that a post and rail fence will be erected on the western boundary of the site. Concern resolved, with thanks. Please can this be detailed as part of any forthcoming HMMP and/or LEMP.

Open space habitat

2.6 Concerns are raised that there may not be sufficient space of an open area of recreational kickabout in the village green. Presently, the SUDS basin (incl. an area of permanent water) takes up much of the space, and the levels will be sloped, making it unsuitable for ball games. It is recommended that the layout of the proposal be modified to allow for a larger area of amenity modified grassland for this purpose. In doing so, this will alleviate pressure on the other neutral grassland areas.

Does not appear to have been addressed.

2.7 It is noted that there are many pockets of other neutral grassland interspersed with modified grassland. It is envisaged that this may be confusing for management contractors, and therefore the different management practices for different grassland types will need to be very clear and signposted within any forthcoming HMMP.

This has been acknowledged.

Allotment

2.8 It is not clear where the allotment is proposed to be located. Please can this be marked on the plans.

This has been amended to fruit tree provision and therefore Traditional Orchard has been proposed in its place. Concern resolved, with thanks.

Scrub

2.9 Scrub planting is proposed immediately adjacent to the hedgerows to the north. Further information is requested on how the retained hedgerow will remain as such, and any management practices to prevent the scrub spreading into the hedgerows.

The ecologist has confirmed that a narrow gap between the proposed scrub and hedgerow will be maintained. It is requested that such detail is included in any forthcoming HMMP.

Draft HMMP

3.0 It does not appear that a draft HMMP has been submitted, as per HDCs local list validation requirements. Target condition criteria and a high-level summary of management to achieve them have not been submitted to HDC in the BNG Assessment, and therefore there is no assurance that the proposal is wholly feasible. It is at the discretion of the Case Officer as to whether this information is submitted prior to grant of any permission. Given the proposal of priority habitat, I would urge this information to be forthcoming. A full HMMP will be a requirement of the legal agreement. It is advised to consult Natural England's HMMP template and checklist for a comprehensive list on levels of content expected.

3.1 It is acknowledged that barbastelle and myotis bats are currently utilising the site, and dormouse have been identified as present. Furthermore, brown hairstreak has been recorded within 1km of the site. I therefore encourage the incorporation of botanical species (incl. night-scented) listed within the Bat Conservation Trusts 'Encouraging Bats: a guide for bat-friendly gardening and living' to be incorporated in the landscaping of the development, both within the main development footprint, and along the commuting corridors (although only native species within the latter). It is also encouraged to incorporate species beneficial to dormouse as listed within the Hazel Dormouse Conservation Handbook (Mammal Society, 2025) including climbers such as *Lonicera periclymenum* and *Clematis vitalba* within the peripheral connecting habitats. As brown hairstreak exclusively lay eggs on blackthorn, the inclusion of this species is also advised.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative –

Scenario 1: BNG Required

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	26/03/2026 15/07/2026 02/09/2026