Ecology Response Note

Land North of Rectory Lane, Ashington November 2026

1.0 Introduction

1.1 This Response Note has been prepared by CSA Environmental on behalf of Taylor Wimpey Ltd. In relation to Land North of Rectory Lane, Ashington (planning ref. DC/26/1186), which is hereafter referred to as 'the Site'). It has been prepared in response to comments received from the Horsham District Council (HDC) Country Ecology Officer (Planning), dated 15 September 2026, which are focused on the Biodiversity Net Gain Assessment documents associated with the application. It is intended that this response note, along with updated copies of the BNG Metric (V6) and associated reports (BNG Design Stage Report; CSA/4705/D and Draft Habitat Management and Monitoring Plan (HMMP) CSA/4705/14/B), satisfy the recommendation for 'modification / more information'. These updated documents were submitted to HDC on 19 October 2026.

2.0 BNG Baseline

BNG Veteran Trees

2.1 The consultation response notes that 8x (BNG) veteran trees (irreplaceable habitat) were recorded at the Site as defined by the BNG legislation (and also 1 x tree included by the NPPF definition); and advises that to adhere to recommended buffer zones in government guidance which should be a least 15x larger that the diameter of the tree or 5m from the tree's canopy if that is larger. Confirmation of buffers zones was requested.

Legislation and Guidance

2.2 Veteran trees are defined within the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 as follows:

"*Veteran trees are mature trees that share physical and other characteristics in common with ancient trees, due to their life or environment, but are neither developmentally nor chronologically ancient. All ancient trees are veteran trees, but not all veteran trees are ancient. Veteran and ancient trees which have died are still recognised as such because they retain significant biodiversity value for many decades.*

Veteran trees exhibit one or more of the following –

(i) significant decay features such as deadwood, hollowing or signs of advanced decay in the trunk or major limbs

(ii) a large girth, depending on and relative to species, site and management history

(iii) a high value for nature, especially in hosting rare or specialist fungi, lichens and deadwood invertebrates"

2.3 Ancient and veteran trees are also defined under the National Planning Policy Framework (NPPF, 2026) as follows:

"*A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.*"

2.4 The definition of a veteran tree contained within the 2024 Regulations is broader than that of the NPPF. Therefore, trees which meet the criteria of veteran under the Irreplaceable Habitats Regulations, but not that of the NPPF, are referred to herein as 'BNG veterans'.

BNG Veteran Tree Buffers

2.5 As detailed on the comments received, eight BNG veterans (T9, T19, T22, T25, T27, T2 and 2 x trees within G6) were recorded on-Site, inclusive of one tree which met the definition of an 'NPPF veteran' (English Oak Tree T25). All of these trees will be retained and buffered appropriately as part of the Proposed Development.

2.6 Further consideration of the NPPF status of particular trees (e.g. T22) has been undertaken by the arborical consultant; confirming that the only tree considered to meet the NPPF criteria for definition of a Veteran Tree is T25 (AIA Addendum; November 2026).

2.7 As such, the proposed scheme provides for an appropriate buffer to T25, in line with Standing Advice and the AIA (BHA, June 2026) confirms that the indicative site layout demonstrates that the required buffer to T25 will be maintained free of development, including ground level changes and drainage features. The areas within the buffer will be enhanced as semi-natural habitat, which will offer an improvement in the soil rooting environment (when compared to the current arable cultivation).

2.8 All other BNG Veteran trees will be retained, and subject to standard buffers in line with BS 5837:2012 Trees in relation to design, demolition and construction — Recommendations. The AIA confirms that there appears

to be ample scope to locate utilities and design ground-level changes so that they avoid the Root Protection Areas (RPAs) of retained trees or can be located where they would have the least impact.

Lighting

2.9 The consultee comments request that an artificial lighting strategy be secured by way of Condition, to avoid illumination (of retained BNG Veteran Trees) from the adjacent residential parcels. This can be addressed at the Reserved Matters stage.

3.0 BNG Post Development

Watercourse Units

3.1 The consultee response requested that post-intervention RCA positive / negative indicator outputs be provided; these are included within in Appendix E (River Condition Assessment) of the BNG Design Stage Report (CSA/4705/15/D).

3.2 The Metric (V6) has been updated to reflect the 'loss' of watercourse to account for increased watercourse encroachment due to the installation of a headwall.

3.3 The consultee response requests that post-development plans are updated once landscape proposals are finalised. This will be provided at the Reserved Matters stage, when Metric calculations will be updated to reflect detailed planting proposals, a final Habitat Management and Monitoring Plan (HMMP) and Biodiversity Gain Plan (BGP) will be finalised. Post-development plans submitted to date have been based on the indicative Illustrative Landscape Strategy; which may be subject to change at the Reserved Maters stage. However, the illustrative plans / BNG Design Stage Assessment demonstrate how the mandatory biodiversity gain requirement may be met.

Hedgerow Units

3.4 The Metric (V6) has been updated to reflect the potential loss (3m wide) of hedgerow sections along H1 and H5, to provide active travel connections to adjacent land, as identified in the ASN2 Draft Allocation Concept Masterplan. As such, the impact of this has been captured within the BNG Assessment. The Post-Development Habitats Plan has been updated to clearly show this.

Non-Native Species

3.5 The consultee response highlights the inclusion of non-native species within Section 24 (Plant Coding) of the Design and Access Statement Part 5. Planting of these species can be limited to residential amenity planting, and this can be secured as part of detailed Planting Proposals to be provided at the RM stage. It is not considered that this impacts the current BNG Assessment.

Strategic Significance

3.6 Strategic significance in the Metric (V6) has been updated to only reflect LRNS objectives R1.6 (Buffers strips along river and streams) in relation to post-development uplift in Strategic Significance. All baseline habitats have been assigned 'Low Strategic Significance', in accordance with Tabel 7 of the biodiversity Metric User Guide.

HMMP

3.7 The Metric (V6) has been updated to reflect the extent of Tree Planting on the Illustrative Landscape Strategy; a total of 96 trees.

3.8 HMMP Box PM-B01 and table PM-T01 have been updated as requested within the consultee comments. Chain harrowing of grassland has been removed as an ongoing management measure (as requested); but will be undertaken within the establishment year to prepare the ground for initial grassland seeding. Reference to the use of herbicides has been removed, honeysuckle added to the proposed hedgerow mix and hedgerow / tree management prescriptions amended to acknowledge the bird nesting season / potential for roosting bats to be present. Management prescriptions for SuDs / rain gardens have been added; and requirements for replacement of failed planting has been incorporated.

3.9 This HMMP will be updated at the Reserved Matters stage to accurately reflect the final Planting Proposals, and inform any further updates to the Metric and BGP. Any further changes to planting mixes / target condition / management prescriptions may be addressed at that point as secure through the BGP condition.

4.0 References

Bartton Hyett Associates (BHA), June 2026. Arboricultural Impact Assessment. Land north of Rectory Lane, Ashington (Ref: 5948).

Bartton Hyett Associates (BHA), November 2026. Addendum to Arboricultural Impact Assessment (DC/26/1186). Land north of Rectory Lane, Ashington.

Ministry of Housing, Communities & Local Government, 2026. *National Planning Policy Framework (NPPF)*. London: Ministry of Housing, Communities & Local Government.