



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land at Hornbrook Farm Brighton Road West Sussex
DESCRIPTION:	Outline planning application for up to 180 dwellings, open space and associated works and infrastructure with all matters reserved apart from access.
REFERENCE:	DC/26/0530
RECOMMENDATION:	More information
SUMMARY OF COMMENTS & RECOMMENDATION: As currently submitted, the metric calculation tool demonstrates that the development will have a 10.09% net gain (+3.16 units) in area habitats, a 25.15% net gain (+1.73 units) in hedgerows, and a 15.00% net gain (+0.35 units) in watercourses. The habitats proposed are generally considered achievable and feasible, however amendments and more information is requested with regards to irreplaceable habitat, condition assessments, and post-development habitats, and suggestions are made for the post-development habitat plans to further meet the priorities of the local nature recovery strategy and aims within the biodiversity opportunity area.	
MAIN COMMENTS: The comments below pertain primarily to the Biodiversity Net Gain proposal as submitted in the above application. However, it should be noted that these comments are not exhaustive. All other ecology matters will be reviewed by Place Services and NatureSpace. The metric calculation tool demonstrates that the development will have a 10.09% net gain (+3.16 units) in area habitats, a 25.15% net gain (+1.73 units) in hedgerows, and a 15.00% net gain (+0.35 units) in watercourses. As such, in accordance with HDC's definition, this is considered significant on-site BNG and will therefore need to be secured via a S106 legal agreement and monitoring fees paid. Monitoring reports will need to be submitted to HDC in years 1,2,5,10,15,20,25 and 30. Please note that the suggested amendments below may result in changes to the final calculated BNG figures. <u>Baseline</u> <i>Hedgerows</i> 1.0 The hedgerows within the condition assessment have been scored in the opposite groups of which they are classified (relating to with and without trees) under Appendix 3 of the BNG Assessment (Urban Edge, 2026, ref. UE0470_Hornbrook_BNG_1_260306). Please can this be amended, and the metric updated with the final overall condition if necessary.	

Irreplaceable habitat

1.1 The HDC Arboricultural Officer states in their consultation response that T56 is of veteran status. Please can this be reflected as irreplaceable habitat in the metric. The comments raised suggesting fencing off the area underneath the veteran tree are supported.

Post-development

Hedgerows

2.0 It is understood from the BNG Assessment that hedgerows H2, H4, H5 and H5a, and H6 will require full or partial removal, largely for access routes. This equates to the loss of c.9m of species-rich native hedgerows with trees, c.10m of non-native and ornamental hedgerow, 88m of native hedgerows with trees, 75m of native hedgerow, and 81m of species-rich native hedgerow. The loss of c.263m of hedgerow is significant, and therefore regrettable. Efforts should be made to avoid removal of hedgerows for multiple access routes where not strictly necessary in line with the mitigation hierarchy. It is noted that the removal of these lengths is to be offset with 815m of new native hedgerow, including 100m of species-rich native hedgerow with trees and 150m species-rich native hedgerow. However, many of these hedgerows are fragmented. If the Case Officer deems this acceptable, then I suggest planting of trees towards the gaps of the hedgerows to ensure there is canopy connectivity across the site.

2.1 It is not clear where the *creation* of new species-rich native hedgerow with trees is to be located (see Appendix 2 of the BNG Assessment, drawing no. UE0470ECO-Hornbrook: HabitatsPostDev2026: 260227). Furthermore, the creation of species rich native hedgerow is not detailed on this map, and hedgerow H6 appears to be downgraded in classification despite its retention within the metric. Please can clarification be sought on these points.

2.2 Confirmation is requested on whether the hedgerow removal required for the proposed emergency access and pedestrian access detailed within the Design and Access Statement has been considered within the BNG Assessment.

Pond

2.3 Pond creation is mentioned in the Preliminary Ecological Appraisal (Urban Edge, 2026, ref. UE0470_Hornbrook_PEA_1_260224), however is not apparent in the post-development habitat maps (see Appendix 2 of the BNG Assessment) or the Landscape Strategy Plan (Liz Lake Associations, 2026, drawing no. 2789-LLA-ZZ-00-DR-0001 rev. P04). Its inclusion is encouraged and would be considered a benefit to the development. This would be in accordance with the opportunities identified within the St Leonards Watershed Biodiversity Opportunity Area (please also see point 3.0 below). Please can further confirmation be sought on this point. If it is due to be added, the cross sections and the frequency of inundation will be required at RM to support its feasibility.

Woodland and the buffer

2.4 It is noted that priority woodland is partially on site and runs along the Horn Brook watercourse. Fencing and signage along the buffer is recommended in the PEA and Ecological Walkover Survey Technical Note (Urban Edge, 2026), to prevent increased damage and disturbance from residential access. This is supported.

2.5 It is noted that Recommendation R2 within the Ecological Walkover Survey Note states that there should be planting of hedgerows, trees and shrubs within the 10m

buffer zone as mitigation for increase disturbance to breeding bird assemblages and bats. It is not clear how other neutral grassland serves this purpose, and therefore further amendments are requested with regards to planting various shrubs and trees along the periphery of the woodland, whilst also retaining the ONG strip.

Watercourse

2.6 It is understood that an outfall into the watercourse is to be installed, however no change of watercourse encroachment is evident in the metric. In line with the metric user guide, please can this be addressed.

2.7 It is understood that an updated RCA has been recommended at RM stage to update the watercourse enhancement suggestions. This is supported.

Grassland

2.8 Within the submitted condition assessments in Appendix 3 of the BNG Assessment, it lists that Criterion F will be 'partially' achieved for other neutral grassland. Please can this be further explained.

2.9 Modified grassland is proposed to achieve good condition for amenity areas and swales. Most of the amenity modified grassland appears to be located along road verges and adjacent to residential dwellings. It also appears to be proposed surrounding the LEAP area to the north of the site. Given the likely increased levels of disturbance from informal play and kickabout, it is advised to dedicate the entire area within and around the LEAP to modified grassland in poor condition. This will also alleviate pressure on the parkland area to the south-east of the site, to ensure that ONG in moderate condition will be met.

Strategic Significance

3.0 The site lies within a core area of the Wilder Horsham District Nature Recovery Network and within the St Leonards Watershed Biodiversity Opportunity Area. It also lies within several priority areas of the draft West Sussex Local Nature Recovery Strategy, which are:

- W1.6 – enhance wet woodland
- W2.1 – create wet woodland
- R1.6 – enhance buffer strips along rivers and streams
- Cor2.2 – create new wildlife corridors

At present, the scheme will receive a strategic significance uplift in accordance with meeting priorities R1.6 and Cor2.2. However, given the above comments regarding the loss and offsetting of hedgerows, commitment to Cor2.2 could be strengthened. In addition, it is encouraged to create further wet woodland in line with point 2.4 above. These are also listed under the opportunities identified for the St Leonards Watershed BOA.

Draft HMMP

4.0 A full HMMP will be required as an obligation under the S106 legal agreement, and to support the Biodiversity Gain Plan when discharging the deemed biodiversity gain condition. The draft HMMP submitted with the application is satisfactory in assuring HDC that the habitats and conditions proposed are feasible and achievable.

4.1 With regards to the contents of the draft HMMP (Urban Edge, 2026, ref. UE0470_HornbrookFm_HMMP_3_260423) to date, it is stated that the specified height of

other neutral grassland sward will be 150mm. Please note that it may be necessary to cut to a shorter sward height and introduce another cut in late winter/early spring to suppress any vigorous grasses, and to satisfy the targeted condition criteria listed in section 2.2.8. This is also important if sowing yellow rattle (*Rhinanthus minor*) which will only germinate if sward height is short in the spring. In addition, arisings cannot be used for hibernacula etc if located within the ONG parcel as doing so may increase nutrient levels and encourage undesirable species to establish. Please note that spot spraying, as mentioned under section 2.2.16 is a last resort and words to that effect should be added.

4.2 The future HMMP will also need to detail full management prescriptions including watering frequency, establishment details such as planting and sowing and any necessary ground preparation, species mix/composition and proportions, a risk register and remedial measures, personnel/organisation roles and responsibilities, and a monitoring methodology. Please see Natural England's HMMP template, companion document, and checklist for more information.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative

Scenario 3: BNG Required + Irreplaceable Habitat

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	15/05/2026