



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land North West of Southwater
DESCRIPTION:	Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure.
REFERENCE:	DC/26/0366
RECOMMENDATION:	Modification / More information (Southwater site) Objection (Christs Hospital site)
SUMMARY OF COMMENTS & RECOMMENDATION: The biodiversity metric demonstrates that the development will have an overall 37.18% net gain (+132.79 units) in area habitat, a 5.75%% net gain (+4.69 units) in hedgerows, and a 25.55% net gain (+2.29 units) in watercourses. However, there are requests for information and potential amendments pertaining to the baseline assessment and advised amendments relating to the post-development layout. The objection to the Christs Hospital site is based on impacts on irreplaceable habitats.	
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 37.18% net gain (+132.79 units) in area habitat, a 5.75%% net gain (+4.69 units) in hedgerows, and a 25.55% net gain (+2.29 units) in watercourses. 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.

It is understood that the extent of hedgerow creation has not been inputted at this stage, as this is yet to be confirmed and are not shown on parameter plans. It is noted that to achieve a 10% in hedgerows, it is proposed that 140m of species-rich native hedgerow with trees, associated with a bank or ditch, 110m of species-rich native hedgerow, and 250m of native hedgerow will need to be created. However, please see point 1.1 below which may change these recommendations.

Southwater Site

Baseline

1.1 Many of the hedgerows are recorded as native hedgerows within the metric and on the UKHab maps within the BNG Technical Note (HDA, 2026). However, the classification does not match those mapped within the Hedgerow Survey ES Appendix 8.5 map (Appendix B, HAD 2022), that details several hedgerows comprising 5 or more woody species, which would result in the classification being species-rich native hedgerows. Species-rich hedgerows hold a greater biodiversity value within the metric. Please can the hedgerow classification be reviewed and confirmed.

1.2 Ponds have been mapped on the UKHab maps outside of woodland; however, the condition assessment appended to the BNG Technical Note has not considered Criteria H and I. Please can these be added. Further, one pond has been entered as moderate condition within the metric, however there is no indication of a pond scoring 5 or above for woodland ponds. Please can this be clarified.

1.3 One parcel of mixed scrub has been entered as poor condition; however, the submitted condition assessment sheets only indicate a score of 3 (moderate). Please can this be clarified.

1.4 Tall Ruderal has been entered within the metric as being in moderate condition, however the condition assessment indicates a good condition (score of 3, including essential Criterion C). Please can this be clarified.

1.5 It is noted that the condition assessment sheet for woodland has been cut off, and is missing condition criteria L and M. Please can these be added.

1.6 It is noted that the condition assessment sheet for hedgerows have been cut off, and do not detail which criteria have been passed and failed. Please can these be added.

1.7 Please can details of the RCA methodology, qualified surveyor and MoRPH5 locations be provided (note the GPS is missing from the condition sheets). Note that all areas of watercourses within 10m and ditches within 5m of the red line boundary should also be caught within the RCA assessment.

Post development

2.0 It is understood by comparison of the pre- and post- Cartographer outputs that the proposed enhancements include:

a) improving the bank face artificial bank profile extent of river section 1 of the southern watercourse, resulting in an overall change in condition from fairly poor to moderate; and

b) improving the bank face artificial bank profile extent of river sections 1, 2 and 3, improving the bank top managed ground cover for section 2, and improving the bank face natural bank profile extent and profile richness for section 3 of the northern watercourse. These enhancements will result in section 3 being enhanced from a fairly poor to moderate condition.

Section 8.6.154 of the ES states that these enhancements are to be done by cessation of livestock poaching on the stream margins; selective thinning of overshading vegetation to increase light levels along margins, and encourage the establishment of more diverse wet grassland and aquatic and marginal vegetation habitats, removal of existing culverts where these are no longer required, and design of a hydrological scheme and management strategy that would result in higher water levels within the streams and continuity of flow. Details of such management will be expected in any forthcoming HMMP. It should be noted that the removal of culverts is not currently reflected in the metric.

The metric currently accounts for removal of encroachment. However, the metric will need to account for any installation of headwalls on watercourses and/or ditches as part of the drainage strategy, that results in increased watercourse encroachment as per the metric user guide.

2.1 Installation of hardstanding for the PROW within the ancient woodland and its buffer zone as detailed within the DAS is not supported, and it is recommended the PROW is realigned to the other side of the buffer zone. Ideally, given the proximity of pathways, the PROW would be realigned to merge with the pathway adjacent to the carriageway verge for this section only, to reduce gaps between the canopies. It is recommended that tree species that tend to have a large horizontal canopy spread are planted either side of the carriageway (5.5m in width) to ensure canopy connectivity. Tree species to consider may include *Tilia cordata*. To assist with planting, verges could be 3m in width with the removal of the additional pathway as aforementioned.

2.2 The UKHab post-development maps do not currently show planting of a buffer around the entire periphery of the ancient woodlands. Please can this be clearly amended.

2.3 Attenuation features as part of the drainage strategy are not supported within any ancient woodland buffer zone, contrary to section 8.6.36 of the ES.

2.4 If pedestrian pathways and cycle lanes through habitats are comprised of an artificial surface, this must be reflected in the metric and on the post-development habitat maps. Roadways within the development comprising of hardstanding also need to be reflected in the post-development UKHab map. Road verges surrounding residential plots should comprise modified grassland as these are likely to be subject to increased recreational pressure.

2.5 Please can the allotment area be added to the metric.

2.6 It is recommended to review any published West Sussex Local Nature Recovery Strategy prior to submitting the Biodiversity Gain Plan, as the rules relating to strategic significance will apply for all applications that have not yet discharged the deemed biodiversity gain condition.

Christs Hospital Site
Post development

3.0 The development will comprise of wholly hardstanding and removal of a veteran tree. It does not appear that a bespoke compensation strategy has been offered in support of the tree's removal and therefore is not compliant with Policy 193(c) of the NPPF.

3.1 The site is directly adjacent to a Local Wildlife Site (Sparrow Copse) comprising ancient woodland. A buffer zone of minimum 15m should be incorporated and vegetated to mitigate against adverse effects.

3.2 Section 8.2.7 of the PEA for the Christs Hospital (Appendix 8.4 of the ES) mentions drainage into the ancient woodland, connecting with the watercourse. Further details are therefore requested.

3.3 The metric does not provide detail by site, which is requested in any forthcoming updated versions for review.

Draft HMMP

4.0 No draft HMMP has been provided as per HDCs local validation list. The proposed target condition criteria have been provided, but a high-level summary of management to achieve them is absent. 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.

ANY RECOMMENDED CONDITIONS:

If minded to approve –

Informative

Scenario 2: BNG Required + Phased Development

Additional text relating to irreplaceable habitat (from Scenario 3) may also be added.

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	01/04/2026