Ecology Response Note

Land West of Billingshurst Road, Ashington October 2026

1.0 Introduction

1.1 This Response Note has been prepared by CSA Environmental on behalf of Devine Homes PLC in relation to Land West of Billingshurst Road, Ashington (planning ref: DC/26/1037), which is hereafter referred to as 'the Site'). It has been prepared in response to comments received from the Horsham District Council (HDC) County Ecology Officer (Planning), dated 03 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 and associated report, address the holding objection such that it may be removed.

2.0 Baseline

Recording of the 'Watercourse'

Within the EcIA

2.1 The Ecological Impact Assessment (EcIA; CSA/7799/01) details the use of the UK Habitat Classification System (UKHab) as the method by which habitats on and adjacent to the Site have been recorded within the EcIA. Through application of the UKHab system, the aquatic feature north of the Site was recorded as 'Standing Open Water (r1), ditch (50)'.

2.2 Under UKHab methodology, it is mandatory that each recorded habitat parcel is allocated a single Primary Habitat Code with secondary codes recorded as appropriate (see Section One, page ii of UK Habitat Classification Version 2.0, 2023). In this case, the primary code selected was 'standing open water (r1)' because it includes '*ditches with open water for at least the majority of the year with limited flow…*' but it should be noted that this is a fairly low-resolution habitat descriptor which sits at level 2 of the five-level hierarchy, with higher levels using longer habitat codes and more specific habitat descriptions.

2.3 'Standing open water (r1)' was selected to apply the secondary code of 'ditch (50)', which is described as '*an artificial standing-water or dry ditch linear feature that is <5m wide and that is >20 times longer than its width.*'

2.4 In reality, the 'ditch' is a shallow drainage channel and has been observed to be dry on all site visits except for the occasion on which the photo included in the EcIA was taken. This photo was taken in February

2026, following a period of extended wet and stormy weather throughout January and February, and was taken in order to note that it does hold water on rare occasions.

2.5 On reflection, it may have been more accurate to have recorded this feature as a secondary code on the description for Woodland 3 which it is within, instead of using the 'standing open water' primary code, as this primary habitat is not present. It would have been remiss not to have recorded this semi-aquatic feature in the EcIA, even though it is only occasionally forming and relatively low value.

Within the BNG Metric

2.6 There are subtle differences between the methodology used in an EcIA and a BNG calculation, even though both use the UKHab system either in part or in full. It is quickly apparent upon opening the Statutory Biodiversity Metric that although it includes some primary habitat classifications from UKHab, it also includes some secondary code habitat as 'primary' habitat.

2.7 A ditch should be recorded within the watercourse module if present on site or within 5m of a Site boundary. However, the User Guide (DEFRA, 2026) defines ditches as '*Artificially created linear water-conveyancing features [that]… are likely to retain water for more than 4 months of the year.*' As discussed above, this drainage feature has not been observed to meet this description, and to record it as a ditch on the watercourses module of the metric would be an overvaluation. Furthermore, the drainage channel is not illustrated on OS Maps as a ditch, tributary or even as a drain. We maintain that it is correct not to record it on the watercourses module for these reasons.

<u>Clarification of Hedgerows</u>

2.8 The comments received are correct to note that hedgerows H2, H3 and H4 are not included in the metric calculations as they are rooted outside of the red line boundary. However, clarity was sought over why they appear on the maps on the EcIA and not on the maps associated with the Biodiversity Net Gain Assessment (BNGA). This is because the BNGA should only include those habitats that are within the Site boundary/ownership, and the associated plans reflect this. However, the off-site hedgerows form part of the immediate local green infrastructure network and offer important resources for a range of fauna, and as such need to be considered when assessing overall ecological impact and are therefore included on the EcIA plans and in the report itself, but the developer has no control over the future management or permeance of those hedgerows so they cannot be included in the BNGA.

3.0 Post-development

3.1 It was requested that the number of gaps in hedgerow H1 are reduced from two to one. One gap (immediately south of the play area) is already present, and there is only one new gap proposed near to the sub-station, so only one gap is proposed. However, wildlife corridors around the periphery of the site will be maintained on Reserved Matters submission documents, as requested.

3.2 It was highlighted that maintenance strips should be implemented for all boundary vegetation. This is agreed in principal and can be included in detailed designs, but it is not something that would typically be mapped on a BNG plan as the maintenance strips would form a feature of an overall habitat parcel rather than a distinct feature in themselves.

3.3 The target condition of 'moderate' for the SuDS is correct in the metric but was given a target of 'good' in the report. This was in error and has been corrected in the report to reflect the metric on the revised copy associated with this response note. On the same topic, clarity was sought on where 'non-priority pond' was proposed on Site as this has not been illustrated on the Proposed Habitats Plan (PHP). As noted in the user comments on the metric, this is allocated to an area equivalent to 10% of the main SuDS basin to account for a permanently wet core, but this cannot be mapped with accuracy at the outline stage.

3.4 Discrepancies/inconsistencies may have arisen on the PHP when compared to the illustrative masterplan (Thrive, 2026. Drawing no. IMP-01 Rev P4) because the PHP was devised through interrogation of both the illustrative masterplan and the Landscape Sketch Plan (Lizard Landscape Design and Ecology, 2026. Plan ref. LLD3780-LAN-DWG-002), as detailed in Methods of the BNGA. All documents will be consistent for submission at Reserved Matters, as requested.

3.5 Proposed planting will give full consideration of comments received at the reserved matters stage, particularly in relation to tree spacing and reputable suppliers of native plants. Planting of oak trees on Site can be reconsidered at reserved matters as part of the detailed landscape strategy/soft landscape proposals.

3.6 It is acknowledged that the tree protection fencing illustrated on 'Combined Tree Retention/Removal & draft Protection Plan' (Barton-Hyett Associates, 2026. Drawing no. BHA_7339_02) does not show full protection of the priority woodland habitat to the north, likely because the western extent of this habitat parcel extends beyond the application boundary. Full protection of this woodland using a small extension of tree protection fencing can be accommodated and will be included on the final Protection Plan at reserved matters.

4.0 Strategic Significance

4.1 The comment regarding the publication of the Local Nature Recovery Strategy (LNRS) is acknowledged, and the allocation of strategic significance multipliers has been corrected on the re-issue of the Statutory BNG Metric.

5.0 Outline HMMP

5.1 The requirement to complete a Natural England Habitat Management and Monitoring Plan (HMMP) template at reserved matters is acknowledged.

5.2 Additional comments received on the outline HMMP are agreed and have been written in to the updated outline HMMP where appropriate.

6.0 References

Department for Environment, Food & Rural Affairs (DEFRA), 2026. *The Statutory Biodiversity Metric User Guide*.

UKHab Ltd (2023). *UK Habitat Classification Version 2.0 (at https://www.ukhab.org)*