

11 September 2026

Daniel Holmes
Horsham District Council,
Albery House,
Springfield Road,
Horsham,
West Sussex,
RH12 2GB

SS/Let/P2310

Dear Daniel,

Response to email dated 26 August 2024 in relation to Application Reference: DC/25/2114 at Land at 519396 111237 Church Farm Walk Upper Beeding West Sussex.

We are writing to you in response to your email dated 26 August which concerns the recent submission of the amended plans and supporting information, including the revised red line boundary, updated drainage strategy, landscape proposals and ecological documentation.

We appreciate the update and have now undertaken a detailed review of the matters raised with the applicant's consultant team. We respond to each point below.

At the outset, however, we consider it important to distinguish between matters which genuinely require resolution before the planning application can be determined, and detailed matters which can appropriately and robustly be secured through planning conditions, the statutory Biodiversity Gain Plan process and/or the associated legal agreement.

A significant amount of additional technical information has now been provided over the course of the application. In our view, the Council has sufficient information to reach a planning judgement on the principle and effects of the development, with appropriate conditions available to secure the detailed mitigation and management measures referred to by consultees where these pass the relevant tests for planning conditions as set out in the NPPF.

1. Amended Red Line Boundary

We acknowledge that the amended red line boundary, received on 25 August 2026, incorporates the land required to facilitate the proposed drainage trench and outfall and that the Council is therefore undertaking a further 21-day consultation exercise.

That said, we would ask that preparation of the officer assessment continues in parallel so that the expiry of the consultation period does not result in a further unnecessary delay to determination.

2. Ecology and Local Wildlife Site

We have carefully considered the further comments relating to the drainage trench, pipework and headwall.

Importantly, the Ecology Officer has not raised an objection in principle to the drainage proposals. The matters identified instead relate principally to the manner in which relatively small scale construction works are undertaken, the reinstatement of the affected land and precautionary measures during construction.

The applicant is entirely willing to accept proportionate and appropriately worded ecological conditions to secure those matters where necessary. We respond to the individual points below.

Detailed construction methodology

The proposed drainage works are limited in scale. In particular, the headwall represents a very small physical intervention and as identified within the ecological information, is of such a scale that it cannot meaningfully be mapped as a separate habitat feature for BNG purposes.

Our ecologist has visited the site and has not raised any specific concern regarding the drainage infrastructure.

We are not presently clear what specific in principle construction impact has been identified by the Council that could not be adequately managed through a standard construction methodology.

Nevertheless, the applicant is content to accept appropriately worded condition could require a Construction Environmental/Ecological Management Plan for the site including the drainage works to be submitted and approved before those works commence.

This would provide the Council with a clear and enforceable mechanism for ensuring that the works are undertaken sensitively without requiring further detailed design information prior to determination of the application.

Habitat reinstatement

The drainage route has been assessed by the project ecologist and classified as modified grassland based on the condition and botanical composition observed on site.

The trench works will result principally in temporary disturbance. Following installation of the pipe, the affected area will be reinstated to modified grassland.

We therefore consider that this is a straightforward construction and reinstatement matter rather than an issue which prevents the Council reaching a view on the planning application.

The required seed mix, timing of reinstatement, establishment measures and subsequent management can readily be secured through the Construction Environmental/Ecological Management Plan and/or the final HMMP.

Ecological compensation for residual impacts

The project ecologist has surveyed the site and has reviewed both the revised red line boundary and detailed drainage information. On the evidence available, the drainage route does not affect a protected habitat or give rise to an identified effect on protected species which would prevent the development proceeding.

We therefore consider that the ecological mitigation and enhancement package already proposed provides an appropriate mechanism for addressing the effects of the development.

Precautionary method statement for breeding birds, including Cetti's Warbler

We have no objection to the use of a precautionary method statement in respect of breeding birds. This is a conventional construction stage ecological safeguard and can readily be incorporated into the Construction Environmental/Ecological Management Plan secured by condition.

There is therefore no need, in our view, for this matter to remain outstanding prior to determination.

Works outside the bird breeding season where appropriate

Similarly, the timing of vegetation clearance and other relevant works can be controlled through an appropriately worded condition.

Use of Planning Conditions

More generally, we consider that the matters identified above demonstrate precisely how appropriately worded planning conditions can be used positively to make development acceptable and secure detailed ecological safeguards.

Policy DM6 of the National Planning Policy Framework confirms that planning conditions should be kept to a minimum and should only be imposed where they are:

- a. Necessary to make the development acceptable in planning terms;
- b. Relevant to the development and to planning considerations generally;
- c. Sufficiently precise to make them capable of being complied with and enforced;
and
- d. Reasonable in all other respects

The applicant is not seeking to avoid appropriate ecological safeguards. On the contrary, we are positively offering to accept conditions where they are necessary to make the development acceptable.

In our view, construction approach, habitat reinstatement, precautionary breeding bird measures and appropriate timing of works are all matters capable of being dealt with through such a mechanism.

3. Biodiversity Net Gain

The Council's latest BNG comments have been reviewed in detail by ECE and the project ecologist alongside the following submitted documents:

- P10959 Church Farm Biodiversity Impact Calculation Report Rev06;
- P10959 Church Farm Statutory BNG Metric Rev09; and
- 10959 Church Farm Consultation Response dated 8 September 2026 (reviewed).
- P2310 HDC Ecology (BNG) Consultation Response ECE Mark Up 260909

ECE Planning has prepared a detailed marked-up response to the Council's latest BNG consultation response, which is provided at Appendix A to this Covering Letter.

Our detailed response demonstrates that the matters raised by the BNG Officer have either now been addressed through the revised information or are matters which can properly be finalised through the statutory Biodiversity Gain Plan, HMMP and legal agreement process.

The latest metric demonstrates a net gain. There is therefore no question as to the ability of the development to meet the statutory biodiversity gain requirement.

It is also particularly relevant that a number of the Council's remaining comments expressly relate to matters to be addressed prior to discharge of the biodiversity gain condition or through the final HMMP/legal agreement.

4. Great Crested Newts

We note that the Council is awaiting a final formal response from the Great Crested Newt District Licensing Officer/NatureSpace. The applicant has responded fully to the matters raised and has submitted two detailed technical ecology responses in August following the further queries received.

We would be grateful if that response could now be chased by the Council so that it does not become a further source of delay to determination.

5. Programme and Determination

We appreciate that the amended red line boundary is presently subject to the statutory consultation exercise and accept that this process needs to conclude.

However, this application was submitted on 16 December 2025 and has now been under consideration for almost nine months.

During that period the applicant team has responded comprehensively and promptly to successive rounds of landscape, ecology, drainage, BNG, policy and NatureSpace comments. Earlier ecology consultation responses have expressly raised no ecological objection subject to conditions, and the applicant has repeatedly supplied additional information as further matters have been raised. Refer to Appendix B to see the submissions in full.

As explained previously, a significant amount of professional time and resource has now been spent addressing these matters. The client is understandably increasingly concerned by the continuing absence of a clear endpoint to the determination process.

ECE has been appointed to progress this planning application to determination on the basis of an appropriate and proportionate evidence base. We do not consider that an applicant can reasonably be expected to continue responding indefinitely to successive rounds of technical commentary where the relevant planning effects have been adequately assessed and any remaining detailed controls can appropriately be secured through planning conditions or the statutory BNG process.

In our professional view, sufficient information is now before the Council to determine the application.

We therefore respectfully request that the application is now progressed towards determination at the earliest available Planning Committee following completion of the current consultation period.

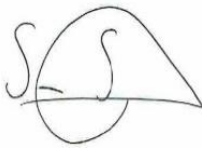
We would welcome a meeting with you to close these matters out and agree the route to determination. Please could we arrange a call during the week commencing 14 September 2026, at which we would hope to agree both the remaining actions and a target Committee date.

We remain committed to working positively with the Council and are entirely willing to agree necessary and proportionate conditions. However, given the extent of information now submitted and the length of time the application has been under consideration, we consider that the appropriate next step is for the Council to move from information gathering to determination.

We look forward to discussing this with you.

If you have any further queries or require further information, please contact me on 01903 248777.

Yours sincerely
ECE Planning



Sam Sykes MRTPI
Director
Encs

Appendix A – ECE Ecology Response – ECE Mark Up



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land at 519396 111237 Church Farm Walk Upper Beeding West Sussex
DESCRIPTION:	Erection of 4 No. detached dwellings with associated amenity space, car parking spaces, detached carports, access road and other associated infrastructure.
REFERENCE:	DC/25/2114
RECOMMENDATION:	More information / Modification
SUMMARY OF COMMENTS & RECOMMENDATION: See below. ECE Planning and Ecology Co-op responses in red below. Further documents submitted to be read alongside response: • P10959 Church Farm Biodiversity Impact Calculation Report Rev06 • Copy of P10959 Church Farm Statutory BNG Metric Rev09 • 10959. Church Farm Consultation response 08.09.26 (reviewed) The metric submitted demonstrates that the development will have an overall 52.67% net gain (+1.07 units) in area habitats and +0.86 units in hedgerows through both on-site and off-site habitat enhancements. Prior to grant of planning permission, it is requested that clarification is sought on the comments regarding the baseline assessment, and it is advised that the consistency between reports relating to enhancements within the off-site blue line area is rectified. All other comments must be addressed to discharge the deemed biodiversity gain condition. Updated figures have been provided in the submitted Statutory BNG Metric and Biodiversity Impact Calculation Report. Regardless, there is a statutory 10% net gain as required by the Environmental Act.	
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, where appropriate.	

The BNG proposed comprises on-site and bespoke off-site enhancements. The metric calculation tool demonstrates that the development will have an overall ~~115.58%~~ **52.67%** net gain (~~+2.27~~ **+1.07** units) in area habitats and +0.86 units in hedgerows. The on-site enhancements alone result in a ~~-40.97%~~ **-40.02%** net loss (~~-0.80~~ **-0.82** units), and therefore the net gain results from the off-site proposal. As on-site is not contributing towards the net gain, **this cannot be considered as significant on-site BNG and therefore a legal agreement to secure on-site proposals is not required.**

Updated figures have been provided in the submitted Statutory BNG Metric and Biodiversity Impact Calculation Report. Regardless, there is a statutory 10% net gain as required by the Environmental Act.

However, all off-site BNG must be registered on Natural England's Biodiversity Gain Register, and a legal agreement and HMMP are required for registration. The applicant will need to notify HDC if they wish to pursue a legal agreement to secure off-site BNG with HDC, and if they intend to sell any excess units. In the case that they do, further assessment of the off-site areas will be necessary. Any legal agreement to secure BNG with HDC will require submission of monitoring reports, typically in years 1,2,5,10,15,20,25, and 30, and upfront payment of monitoring fees.

The applicant has confirmed their intention to secure the off-site BNG with HDC, with all units solely intended for the biodiversity uplift for the development.

The applicant is happy to peruse a legal agreement to secure off-site BNG with HDC.

Please note that registration of the off-site BNG incurs a fee, and therefore it may be in the applicant's interest to explore whether the proposed off-site habitats can be absorbed into a larger red line boundary. This would also be in better accordance with the Biodiversity Gain Hierarchy. This would not negate the need for a legal agreement and management and monitoring for 30 years, as this would result in the proposal being significant *on-site* BNG. However, this option would require less admin and registration fees. This decision must be made prior to grant of planning permission to enable HDC to draft the on-site legal agreement. In this case, the HMMP would become an obligation within the legal agreement, rather than a condition.

As above. We are already in conversations with HDC's legal team to form a legal agreement. Heads of terms have been forwarded.

Baseline

1.0 Google Earth and the site visit photographs from 2025 (see the Ecological Impact Assessment, The Ecology Co-op 2025) confirm that the site undergoes periodic bramble scrub clearance. However, Figure 6 of the EcIA maps trees separately to the bramble scrub parcel which is not apparent within the Biodiversity Impact Calculation (The Ecology Co-op, 2025), and therefore further clarification is requested with regards to individual trees on-site.

Does not appear to be addressed.

Please note that the most recent version of the statutory biodiversity metric, which indicates a habitat unit change of 52.67%, accounts for this tree at row 5 of tab 'A-1 On-Site Habitat Baseline'. The tree has therefore been accounted for; its original omission

was due to its position within a shared boundary, and as a precautionary measure it is included in the current calculations.

1.1 It is understood that the indicative drainage strategy details installation of pipework and an outfall at the nearby watercourse within the blue line boundary. As per Paragraph 024 of the PPG, the red line boundary should include all land necessary to carry out the proposed development. As such, it is at the case officer's discretion whether the drainage should be incorporated into the red line boundary. If the red line boundary is located 5m from the top of the bank of ditches and 10m from the top of the bank of other streams and rivers, this crosses the riparian zone and thus triggers the watercourse module of the metric, and a 10% net gain will need to be achieved for watercourse habitat.

Note that for other streams and rivers, a river condition assessment will be necessary to inform the watercourse BNG assessment. As BNG is finalised via the deemed pre-commencement condition, any changes to the red line boundary prior to the submission of the biodiversity gain plan must be reflected in the final metric calculations. It should also be noted that the floodplain grazing marsh and watercourse are highlighted under the priorities of the draft West Sussex Local Nature Recovery Strategy.

The red line boundary has since been redrawn to include the area required to implement the drainage strategy. However, the argument made states that as the ditch is dry it does not need to be entered within the watercourse module. Given the photograph provided in the outline drainage strategy, this is accepted.

The baseline for the pipe route has also been recorded as modified grassland. However, the Natural England's Priority Habitat inventory maps this area as coastal and floodplain grazing marsh. No evidence has been submitted to support modified grassland classification.

Floodplain grazing marsh is not a mappable habitat within the biodiversity metric, which is based on UKHab codes. The Modified grassland habitat code has been applied on the basis of the site assessment and the botanical composition recorded. The habitat notes held on our project file record perennial rye-grass as dominant, with cock's-foot abundant and Yorkshire fog frequent, which fits this habitat characterisation. The area itself lies upslope of the wetland features associated with the LWS, within a dry part of the site.

Post-development

2.0 The site falls within the River Adur Water Meadows and Wyckham Wood Local Wildlife Site. The proposed habitats are not representative of the habitats that are cause of the LWS designation, however given the baseline largely comprised of scrub, and the site is bordered by priority habitat woodland, the planting of woodland to extend this parcel and inclusion of mixed scrub to retain the ecological function is considered acceptable. The woodland is also highlighted within the draft West Sussex Local Nature Recovery Strategy as a priority for enhancement.

Woodland planting is now proposed within the off-site area. However, the metric and HMMP management prescriptions do not reflect this. This needs to be updated prior to discharging the deemed biodiversity gain condition and obligation within the S106 for off-site. It is also noted that the baseline (see Figure 1 in the Biodiversity Impact Calculation report / Figure 2 in the HMMP) for off-site includes a small section of woodland, that is not accounted for in the metric, and the habitat creation should not double count woodland planting in this area. Please can this be rectified.

The overlap in the off-site woodland has been identified and adjusted, with all habitats within the blue line now categorised as retention, creation or enhancement in a revised metric calculation and accompanying report. The HMMP has been produced as an illustration; the Natural England template document is yet to be prepared and will support the Biodiversity Gain Plan to be submitted prior to commencement.

2.1 It is requested that the hedgerows bordering the priority woodland habitat off-site is comprised of spiky species to act as a deterrent and discourage public access.

Concern resolved, with thanks. N/A

2.2 The Landscape Proposals (CSA Environmental, 2024, drawing no. CSA/5627/104) do not appear to be consistent with the Site Layout (Paul Hewett 2025, drawing no. 2517/PL.03) or Figure 3 in the Biodiversity Impact Calculation report. Specifically, it appears to be missing the hedgerow running along the western boundary of the site.

Concern resolved, with thanks. N/A

2.3 The blue line boundary for the off-site proposals is not consistent within the Biodiversity Impact Calculation and the draft Habitat Management and Monitoring Plan (The Ecology Co-op, 2026) (or habitats within the landscape proposal). The BNG strategy also appears to differ within the two documents. Please can the correct strategy be confirmed.

The correct strategy has since been confirmed. Please note that Figures 1 and 2 within the HMMP may result in confusion for management contractors, and it is therefore recommended to redraw the red line boundary and blue line boundary to match that of the areas within Figure 3.

We will ensure this is updated, at condition / obligation stage, in line with the suggested conditions.

Strategic significance

It is noted that some entries within the metric have been assigned as having a high strategic significance. The West Sussex Local Nature Recovery Strategy was published in June 2026, and therefore the assigned strategic significance must accord with the priorities within this strategy. Specifically, as the habitat delivery is proposed in areas not highlighted within the LNRS (with the only overlapping area being the installation of a drainage pipe and headwall in the area highlighted for enhanced floodplain grazing marsh), all habitat entries should be assigned as having low strategic significance by default. Please amend this prior to discharging the deemed biodiversity gain condition.

We will ensure that any necessary updates are made to the HMMP to meet the planning condition suggested in your consultation note, and that it incorporates detailed habitat creation and management prescriptions. The delivery of these proposals is not in question, and it is welcomed that the creation of new woodland habitat is deemed acceptable in this context. Further, as the LNRS has been published since the application was submitted, the off-site metric inputs have been updated accordingly in the revised metric calculation.

HMMP

3.0 A draft HMMP has been provided in accordance with HDCs local validation list. A final HMMP will be required either by condition or as an obligation within the legal agreement. The following comments should be addressed to discharge the HMMP condition/obligation.

Please note that further amendments to the HMMP may be required dependent on which BNG strategy is being proposed (see point 2.3 above).

3.1 There are multiple incorrect statements in Section 1.1, please can these be amended to reflect the BNG strategy for this scheme.

As the biodiversity net gain for this scheme is delivered in part through off-site habitats, we have already established that the relevant gain site will need to be registered on Natural England's biodiversity gain site register, and the HMMP forms part of the information required for that registration. It will be prepared in accordance with Natural England's HMMP template and may be subject to minor change through the registration process.

Registration and the approval of the Biodiversity Gain Plan are pre-commencement requirements under the biodiversity gain condition attached to the permission by Schedule 7A to the Town and Country Planning Act 1990. The finalisation of the HMMP therefore properly sits within that pre-commencement framework rather than being resolved prior to determination, and I would suggest the points raised are best addressed through the finalised HMMP as part of gain site registration.

The HMMP requires updating to reflect the BNG strategy as per Figure 3.

We will ensure this is updated, at condition / obligation stage, in line with the suggested conditions.

3.2 Please provide a management prescription schedule in tabular format within the appendices.

Does not appear to be addressed.

We will ensure this is updated, at condition / obligation stage, in line with the suggested conditions.

3.3 Please detail how the individual trees will be managed differently to the mixed scrub to ensure they are not accidentally subject to mismanagement. This may also apply to where mixed scrub and hedgerow are proposed immediately adjacent to each other.

Concern resolved, with thanks. N/A

3.4 Treatment with herbicides is strongly discouraged, given the local wildlife site location and proximity to floodplain grazing marsh habitat. Alternative methods should be used instead, irrespective of the abundance of undesirable species. The only times herbicide should be used is when eradicating invasive non-native species as listed under Schedule 9 of the Wildlife and Countryside Act 1981.

Does not appear to be addressed.

I am unsure where this concern has arisen, as the HMMP provided does not recommend the use of herbicides. A clear instruction that herbicides must not be used can, however, be included in the final version submitted to meet a pre-commencement condition.

3.5 The practicality of management of other neutral grassland and modified grassland strips immediately adjacent to each other in the southeast of the site has potential to lead to mismanagement. It is advised to either have wholly as other neutral grassland or modified grassland.

The reasoning behind this has been justified. N/A

3.6 It is advised not to flail the hedgerow, given the other neutral grassland is to be established at the base. Heavy machinery will likely cause destruction of this habitat. A circular saw is the preferred option.

Does not appear to be addressed.

Please note that the HMMP it states that Hedges should be cut in rotation, cutting only a third of all hedgerows in one year. Flails should be avoided and the use of a circular saw is required. However, this can be included in the final version submitted to meet a pre-commencement condition

3.7 The Landscape Proposals (CSA, 2024) must be in accordance with the HMMP.

This includes proposed species mixes. N/A

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative –

Scenario 1: BNG Required

Condition

Habitat Management and Monitoring Plan (HMMP)

Pre-Commencement Condition: Agreed.

The development hereby permitted shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the Biodiversity Gain Plan and including:

- (a) a non-technical summary;
- (b) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the Biodiversity Gain Plan, together with a timetable for its provision;
- (c) the management measures to maintain habitat in accordance with the Biodiversity Gain Plan from the completion of development; and
- (d) management responsibilities of the people or organisation(s) delivering the HMMP

has been submitted to, and approved in writing by, the Local Planning Authority.

The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Any proposed or retained planting, which within a period of 5 years after the completion of development, dies, is removed, or becomes seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 and Policy 31 of the Horsham District Planning Framework (2015).

NAME:

Linsey King
Ecology Officer (Planning)

DEPARTMENT:

Strategic Planning - Specialists

DATE:

05/06/2026
[18/08/2026](#)

Appendix B – Correspondence showing submissions to LPA

Date	Party	Matter Raised / Action	Applicant Response / Outcome
Submission 16 December 2025			
12 February 2026	Place Services - Landscape	Not supportive on landscape grounds. Further information required.	Response submitted 20 March 2026.
16 February 2026	Place Services - Eco	No ecological objection subject to attached conditions	No action.
2 April 2026	Place Services - Landscape	Welcomes the amended landscape proposals and considers that they improve mitigation of landscape and visual effects. However, concerns remain regarding development within the LoWS/SNCI and its impact on the setting of the listed Church and Priory. Conditions suggested.	No action.
8 April 2026	ECE to HDC	Email following latest consultation response (2 April 2026) stating that we not there is a no no objection has been raised, and that the amendments to the scheme, particularly the enhanced landscape mitigation, are welcomed. Given this, I just wanted to check the current timescales for determination.	No action.
16 April 2026	ECE and HDC Teams Meeting	Positive discussions and confirmation that the scheme was being written for approval. ECE provided solicitors details.	Amended landscape plan submitted 22 April 2026.
29 April 2026	ECE to HDC	Email to push to May committee.	No action.
11 May 2026	ECE to HDC	Email to push to May committee.	No action.
12 May 2026	ECE to HDC	Email to push to 2 June committee.	No action.
12 May 2026	HDC to ECE	Email confirming the drainage officer raises no objection, subject to conditions requiring a finalised drainage strategy and further ground testing to confirm the swale design. The application is provisionally targeted for the early June Committee, although this is not yet confirmed. The Council's Legal Department will also contact the applicant regarding the Section 106 agreement to secure Biodiversity Net Gain.	No action.
14 May 2026	ECE to HDC	Comments on proposed conditions for Committee Report.	No action.
28 May 2026	HDC to ECE	Email from Daniel which identified three late-stage matters requiring resolution: - Further justification is needed to demonstrate that the development would not significantly harm the River Adur Water Meadows & Wyckham Wood Local Wildlife Site. - The Council's ecologist is reviewing concerns relating to a possible active badger sett, barbastelle bats and notable	Amended ecology addendum submitted 4 June 2026.

		bird species, with further surveys or information potentially required. Historic England has now been formally consulted regarding effects on the setting of nearby listed buildings. Consequently, the application is unlikely to proceed to the forthcoming committee and may be deferred to the early July Planning Committee. The case officer will also respond separately on the proposed amendments to the planning conditions.	
3 June 2026	ECE and HDC Teams Meeting	Teams meeting with HDC. Requested further ecological information to address impacts on the Local Wildlife Site, neighbour representations relating to bats, Cetti's Warbler and badgers, and clarification of Biodiversity Net Gain baseline habitat assessments. Confirmed that the application could not be scheduled for Planning Committee until the outstanding ecological and BNG matters had been resolved.	Amended ecology addendum submitted 5 June 2026. To address neighbour comment on badgers.
9 June 2026	Place Services - Eco	No ecological objection subject to attached conditions.	No action.
12 June 2026	HDC BNG Officer	Confirmed that the submitted metric demonstrated an overall 115.58% biodiversity net gain, primarily through off-site habitat enhancements. Requested clarification of the baseline assessment, drainage and watercourse implications, and inconsistencies between the metric, landscape proposals and HMMP. Amendments to the BNG strategy and HMMP were also required, together with a legal agreement and registration of the off-site biodiversity gains.	Amended ecology information submitted 30 July 2026.
29 July 2026	HDC Policy Comments	Strategic Planning advised that the site lies within a Local Wildlife Site identified as an Area of Particular Importance for Biodiversity in the West Sussex Local Nature Recovery Strategy. Further information was requested on the final drainage design, off-site works, application boundary, and any resulting implications for the biodiversity metric, HMMP and BNG strategy. An extension of time to 19 August 2026 was also requested.	Addressed in submission of 30 July 2026.
13 August 2026	ECE to HDC	Email to push to 9 September Committee .	No action.
14 August 2026	HDC to ECE – Nature Space	Requested clarification following advice from NatureSpace (District Licensing Officer for Great Crested Newts). The Landscape Officer noted that Great Crested Newts did not appear to have been considered within the Ecological Impact Assessment or subsequent addenda and requested the applicant discuss the matter with their ecologist and provide a response.	Amended ecology information submitted 17 August 2026.
18 August 2026	HDC to ECE – Nature Space	The District Licensing Officer advised that the ponds identified in the ecological addendum were not those raised by the interested party. The relevant ponds were confirmed to exist and to be holding water, with other newt species reportedly	Amended ecology information submitted 19 August 2026.

		recorded in Waterbody B. Further clarification and ecological assessment were requested from the applicant.	
26 August 2026	HDC to ECE – Ecology and BNG	Advised that the amended red line boundary required re-consultation for 21 days before the application could be determined. Ecology Officer raised concerns regarding impacts of the proposed drainage works on the Local Wildlife Site and requested further mitigation, habitat reinstatement, ecological compensation and construction methodology. Advised that further amendments to the BNG assessment, metric and HMMP were required before the biodiversity gain condition could be discharged. Advised that a final response from the Great Crested Newt District Licensing Officer remained outstanding. Confirmed that the application could not be progressed to Planning Committee until the consultation period had ended and outstanding ecological matters had been resolved.	Submitted with this Covering Letter.