



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land West of Shoreham Road Henfield West Sussex
DESCRIPTION:	Erection of a complex of 4no. buildings comprising of 12no. light industrial units for employment use (office, industrial, storage and distribution uses (B2, B8 & E(g) use)) with associated car parking, access and landscaping.
REFERENCE:	DC/26/0556
RECOMMENDATION:	Holding Objection / Modification / More information
SUMMARY OF COMMENTS & RECOMMENDATION: The metric calculation tool submitted currently demonstrates that the development will have a +6.23% net gain (+0.99 units) in area habitats and a +12.02% net gain (+0.89 units) in hedgerows. However, a holding objection is recommended on the grounds of the omittance of the watercourse module and missing condition assessment sheets to evidence the baseline. Further comments are made relating to the post-development habitats proposed and the draft HMMP content.	
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 necessary. The metric calculation tool submitted currently demonstrates that the development will have a +6.23% net gain (+0.99 units) in area habitats and a +12.02% net gain (+0.89 units) in hedgerows. It is assumed that the remaining net gain for area habitats will be met via purchase of local habitat bank units, however clarification is requested in this regard. In accordance with HDCs significant on-site criteria, the proposed on-site BNG is considered significant and therefore a legal agreement to secure the delivery will be required. Monitoring reports will ned to be submitted to HDC typically in years 1,2,5,10,15,20,25 and 30, and an upfront monitoring fee will need to be paid. However, please note that the comments below may alter the final BNG calculation figures. <u>Baseline</u> 1.0 The baseline assessment regarding the area habitats and hedgerows is agreed. However, a ditch is located immediately adjacent to the south-west of the site boundary. A wire runs along the top of the bank. This ditch was holding water with no apparent flow during my site visit in June 2026, and saturated soil in the vicinity and abundant	

water-tolerant plant species such as pendulous sedge and hemlock water dropwort suggest this ditch is regularly wet (please see photos appended below). Rush species are also present within the adjacent fields. As such, as the site boundary lies within the 5m riparian zone, this must be assessed under the watercourse module of the metric. Updated condition assessments, BNG assessment report, and metric will be expected prior to grant of planning permission. Any installation of headwalls as part of the drainage strategy will need to be accounted for in the watercourse encroachment section of the metric.



1.1 The condition assessments for modified grassland, bare ground, rural trees and ecologically valuable line of trees are missing from Appendix 1 of the Outline Biodiversity Net Gain Summary (The Ecology Partnership, 2024). Please can these be submitted.

Post-development

2.0 It is advised not to plant trees on top of or in proximity to the crate diffusers (or any other drainage infrastructure) to ensure any future access is not impeded and the trees survivability is assured (please see drawing no. 16711-HOP-ZZ-xx-DR-C-9000 P02 in the Flood Risk Assessment and Drainage Strategy, HOP 2024).

2.1 It is also advised that the trees proposed in the 'BNG area' in the western field parcels are planted in loose clusters rather than spread across the site, to further prevent excessive shading and make management of the grassland easier and reduce any potential damage on the trees resulting from grassland management.

2.2 The HDC Arboricultural Officer concerns are noted and supported, and therefore these should be addressed to resolve any concerns over certainty of tree retention. In addition, the feasibility of hedgerow creation and mixed scrub extension along the boundary in the north and eastern fields is questioned, due to the development footprint (comprising tall building units) being proposed very close to the existing boundary vegetation. It is considered likely that these units will introduce permanent shade in areas, and therefore shade-tolerant species may need to be considered where enhancements are possible.

2.3 It is noted that a surface water drain is proposed (Flood Risk Assessment and Drainage Strategy, HOP 2024) through the hedgerow to be created in the eastern fields, surrounding the commercial units. Further information is requested on the relationship between the drain and the hedgerow.

Strategic significance

3.0 The site falls within priorities of the draft West Sussex Local Nature Recovery Strategy (LNRS), including creation of new woodland and immediately adjacent to the site, enhance priority habitat. I would therefore advise some woodland planting, or encourage natural succession towards this habitat, in locations where enhanced mixed scrub is proposed in the western-most parcel. With such enhancements, this would qualify as strategically significant and thus receive a biodiversity unit uplift. Please note that the LNRS is due for publication by the end of the June, at which point it will apply to all permissions that have not yet had their biodiversity gain condition discharged.

Draft HMMP

4.0 A full and finalised HMMP will be required as an obligation within the legal agreement, and to support the Biodiversity Gain Plan which is required to discharge the deemed biodiversity gain condition. It is advised to review the Natural England HMMP template, checklist, and companion document for expected content.

4.1 Criterion H for pond creation requires emergent, submerged or floating plants. The mix may therefore need additional in-water planting.

4.2 It is requested that detail regarding how the proposed individual trees within the mixed scrub will be managed to ensure avoidance of accidental mismanagement.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative

Scenario 1: BNG Required

NAME:

Linsey King
Ecology Officer (Planning)

DEPARTMENT:

Strategic Planning - Specialists

DATE:

18/06/2026