



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Bellway Homes Development Site Wooddale Lane Billingshurst West Sussex
DESCRIPTION:	Erection of a temporary residential sales area to include provision of parking, landscaping and use of a sales cabin.
REFERENCE:	DC/26/0049
RECOMMENDATION:	Holding Objection / Modification
SUMMARY OF COMMENTS & RECOMMENDATION: The baseline assessment is considered incorrect, due to not accounting for the watercourses and all existing hedgerows on-site. Further, current classification of the eastern hedgerow is not agreed. The post-development plans also require amendments.	
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 12.01% net gain (+0.12 units) in area habitat and an 80.56% net gain (+0.17 units) in hedgerows. As the proposed gains relate to habitats of medium distinctiveness, the proposal is considered significant on-site BNG as per HDC's definition. As such, 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. However, please note the requested amendments below are likely to modify the BNG calculation figures. Off-site enhancements are also proposed. Further information is requested as to the location of the off-site area within the wider setting and blue land of the applicant. All off-site BNG needs a legal agreement (either S106 or conservation covenant) to register on the Biodiversity Gain Site Register, which is a requirement under the BNG legislation. All off-site units must be allocated to the development prior to submitting the Biodiversity Gain Plan to discharge the deemed condition. If the applicant wishes to enter a legal agreement with HDC to secure the off-site area, please advise the Case Officer as a separate site visit will be necessary. <u>Baseline</u> 1.0 A culvert and an artificial ditch with high structural banks, marginal vegetation, and standing water are present within the red line boundary to the south of the site running adjacent to the balancing pond (see photographs below). As this	

ditch meets the criteria of a watercourse within the Biodiversity Metric User Guide, this must be included within the watercourse module of the metric.



1.1 There are several mature trees within the hedgerow bordering the east of the site. The UKHab definition of a hedgerow with trees is as follows:

A linear feature $\geq 20\text{m}$ long with a woody component $< 5\text{m}$ wide at its base, a shrub layer present and with ≥ 2 prominent trees taking their natural shape that are $< 20\text{m}$ apart over most of its length.

The 35m length of hedgerow recorded meets the above definition (see photograph to the right) and therefore should be modified to 'native hedgerows with trees' within the metric.

1.2 There is also an existing hornbeam hedgerow running along the north of the site, which can be seen in the Sales Area Landscape Masterplan (drawing no. 3360-APA-ZZ-XX-LA-L-1003, Allen Pyke 2025) and Detailed Planting Plan Sales Area (drawing no. 3360-APA-ZZ-XX-PP-L-2007, Allen Pyke 2025). See photograph to the right. This is not recorded within the baseline assessment and therefore must be added in the hedgerow baseline tab of the metric.



1.3 Modified grassland is recorded on the access part into the adjacent site. It is currently understood that this area of habitat is to be other neutral grassland resulting from the main application site consent (see DISC/25/0257).

This is proposed to be replaced as hard standing, and therefore it is advised to denote this area as ONG at baseline to ensure the relevant uplift is being provided.

Post-development

2.0 It is noted that native hedgerow creation is proposed where the existing hedgerow is located to the north of the site (see Plan Eco2: Proposed Habitats within the BNG Report, Ecology Solutions 2025). This is considered double-counting, and therefore this should be removed from the plan and calculations. Enhancement of this hedgerow from native hedgerow single row to double row species-rich hedgerow is an option. As the hedgerow does not reach the end of the fence, creation of additional hedgerow length is acceptable.

2.1 Other neutral grassland in both poor and moderate condition are proposed on-site. Please can Plan ECO2: Proposed Habitats within the BNG Report (and to be incorporated into the HMMP) be updated to delineate this habitat by condition.

2.2 It is noted that almost a 6m length of hedgerow is to be removed to install a timber bridge going over the on-site ditch.

HMMP

3.0 A draft HMMP has not been submitted, as per the requirements under HDC's local validation list. However, the information pertaining to the post-development habitats contained within the BNG report under Table 3.3 will suffice for determination. It is considered that the proposed on-site habitats and conditions are feasible and appropriate. Note that a full HMMP will be required for the legal agreement – please refer to Natural England's HMMP checklist for advised content.

3.1 Some young trees are to be retained as per Detailed Planting Plan Sales Area – please incorporate this into the full HMMP.

3.2 It is understood that the removal of hedgerow along the east of the site is to be reinstated once the temporary nature of the development is complete. Please incorporate these details into the full HMMP, alongside any other reinstatement works. Note that as this is considered significant on-site BNG and requires management and monitoring for 30 years, the habitats within the hardstanding footprint of the development cannot be removed without delivering net gains above these proposals and approved by HDC.

ANY RECOMMENDED CONDITIONS:

If minded to approve –

Informative:

Scenario 1 – BNG Required

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	09/03/2026