



## HORSHAM DISTRICT COUNCIL CONSULTATION

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| <b>TO:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Horsham District Council – Planning Dept                                                                                                                                                                                                  |
| <b>LOCATION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Duckmoor Farm Wooddale Lane Billingshurst West Sussex                                                                                                                                                                                     |
| <b>DESCRIPTION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Application for Approval of Details Reserved by Condition 11 (Landscape and Ecological Management and Maintenance) to approved application DC/20/2607 (83 residential units, landscaping, access, parking and associated infrastructure). |
| <b>REFERENCE:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | DISC/26/0027                                                                                                                                                                                                                              |
| <b>RECOMMENDATION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | More information                                                                                                                                                                                                                          |
| <b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b><br><p>As stated in my response to DISC/25/0257, to ensure that the BNG measures will be delivered, the LEMP must refer to the targeted condition criteria for each proposed UKHab habitat type as per the approved metric/BNG plan, and detail how these will be achieved via appropriate management practices. Further amendments are also advised.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                           |
| <b>MAIN COMMENTS:</b><br><p><u>Condition 11</u></p> <p><i>No part of the development approved at reserved matters applications pursuant to the outline planning application hereby permitted shall be occupied until a Landscape and Ecological Management and Maintenance Plan (LEMMP) has been submitted to, and been approved in writing by, the local planning authority. The content of the LEMMP shall include the following:</i></p> <ul style="list-style-type: none"> <li><i>a) Details of long term design objectives, including description and evaluation of features and all communal landscaped areas to be managed.</i></li> <li><i>b) Ecological trends and constraints on site that might influence management.</i></li> <li><i>c) Aims and objectives of management.</i></li> <li><i>d) Appropriate management options for achieving aims and objectives, including management responsibilities, a description of landscape components, management prescriptions, maintenance schedules, and accompanying plan delineating areas of responsibility.</i></li> <li><i>e) Prescriptions for management actions.</i></li> <li><i>f) Preparation of a work / maintenance schedule (including an annual work plan capable of being rolled forward over a five-year period).</i></li> <li><i>g) Details of the body or organisation responsible for implementation of the plan.</i></li> <li><i>h) Ongoing monitoring and remedial measures.</i></li> </ul> |                                                                                                                                                                                                                                           |

*The LEMMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan shall be implemented in accordance with the approved details.*

My comments below relate to the suitability of the submitted LEMP to support the BNG delivery, as approved under Condition 22 (DISC/25/0257).

- Aim 1 does not correctly list all the proposed creation and enhancement measures as detailed within the metric. Specifically, creation of new grassland (separate to enhancement of existing), creation of *multiple* waterbodies (and SuDS) and creation of hedgerows.
- There are 'suitable species' tables throughout the LEMP. It is advised to append the planting schedule or refer to the species listed in the planting schedule, as this is an approved document under DISC/25/0257. There are some tables that contain additional species not listed in the planting schedule, such as Table 3 *Nymphaea alba*.
- There should be consistency across documents when referring to habitat types, to avoid confusion. It is noted that there is no reference to the UKHab classifications, making it difficult to determine how the habitats will meet these classifications and align with the approved BNG plan.
- There is no reference to the targeted condition criteria for proposed habitat creation or enhancements (as per entered within the metric) and the specific management required to achieve these. This is necessary to ensure that the habitats will meet their proposed condition and thus an overall 10% net gain.
- It is noted that other neutral grassland to achieve a poor condition is proposed. To ensure the correct species density per m<sup>2</sup>, a remedial measure may require additional mowing in early spring.
- When referring to remedial measures of replacing failed specimens, please refer to replacement planting in the following planting season. Please extend replacement planting for failure of establishment to all other habitat types.
- Herbicide application to control undesirable species is not supported, unless as a last resort or when eradicating species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Please amend Section 5.4.6 to reflect this.
- Please add information relating to watering frequency – a maintenance schedule by habitat type is a clear and concise way to summarise the information to present this. It is advised to include this.
- All points raised by the HDC Landscape Officer in their consultation response listed under 'e) *prescriptions for management actions*' is supported.

**ANY RECOMMENDED CONDITIONS:**

N/A

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| <b>NAME:</b>       | Linsey King<br>Ecology Officer (Planning) |
| <b>DEPARTMENT:</b> | Strategic Planning - Specialists          |
| <b>DATE:</b>       | 04/03/2026                                |