



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Outline application for the erection of approximately 24 residential dwellings, with all matters reserved except for access.
DESCRIPTION:	Land at Station Road Warnham West Sussex RH12 3SR
REFERENCE:	DC/26/0585
RECOMMENDATION:	Holding objection / Modification No objection

SUMMARY OF COMMENTS & RECOMMENDATION:

[All comments have been addressed, which is welcome. Further amendments are required at reserved matters/discharge of conditions relating to the local nature recovery strategy and strategic significance, and the content of the HMMP.](#)

The metric calculation tool currently demonstrates that the development will have an overall 14.89% net gain (+0.64 units) in area habitats [and a 12.58% net gain \(+0.01 units\) in hedgerows](#), with contributions from off-site bespoke habitat enhancements. ~~However, there are concerns pertaining to the baseline assessment that need addressing, and further comments regarding the relationship between the layout and the adjacent priority woodland habitat, additionality for off-site BNG, and post-development habitats.~~

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.

The BNG proposed comprises on-site and bespoke off-site enhancements. The metric calculation tool demonstrates that the development will have an overall 14.89% [18.63%](#) net gain (+0.64 [+0.67](#) units) in area habitats [and a 12.58% net gain \(+0.01 units\) in hedgerows](#). The on-site enhancements alone result in a ~~-23.40%~~ [-16.85%](#) net loss (~~-1.01~~ [-0.61](#) units) [in area habitats and a -100% net loss \(-0.05 units\) in hedgerows](#), 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.** 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.

Please note that the West Sussex Local Nature Recovery Strategy is now published, and therefore the metric strategic significance will need to be in accordance with the LNRS and metric user guide when discharging the deemed biodiversity gain condition. The off-site areas are covered by woodland and watercourse priorities.

Baseline

1.0 One pond on-site has confirmed presence of GCN (see section 6.3.4 of the Environmental Impact Assessment, EcoSurv 2026, with reference to 'Pond ID 1') and therefore meets priority habitat criteria. Please amend the entry within the metric and add 'pond (priority habitat)' for the GCN confirmed pond.

Concern resolved, with thanks. However, it is noted that the classification of the proposed off-site pond has now changed from non-priority to priority, and the HMMP states that priority habitat status will be achieved through the active GCN population colonising the pond. This is not a certainty, and therefore further action is required to ensure priority habitat status. If not, this should be downgraded to non-priority.

1.1 The metric accounts for 16 small trees, 3 medium trees, and 1 large tree. However, the trees listed in the Tree Survey Schedule (Arboricultural Constraints Survey, EcoSurv 2025) demonstrate that there are at least 2x trees that have a large DBH (see T5 and T9, scots pine 72cm and oak 74cm respectively). Please can clarification be sought on why 1 large tree is recorded in the metric.

2x large trees are now accounted for in the metric (total: 16 small, 2 medium, 2 large), with eight small trees, both medium trees, and one large tree recorded as lost. Concern resolved, with thanks.

1.2 It is also noted that a hedgerow (H1 on Tree Survey Schedule) has been recorded to the south of the site which is to be removed to facilitate access. Please can justification be provided as to why this has been omitted from the BNG assessment (which is currently mapped as modified grassland on the Baseline Habitat Map in the BNG Statement (EcoSurv, 2026)).

12m of hedgerow has now been added to the metric. Concern resolved, with thanks.

Post-development

2.0 Table 20 and Section 8.20 within the EcIA (EcoSurv, 2026) lists the mitigation and compensation measures advised. As part of this, proposals include a 15m buffer for the priority woodland habitat, soft landscaping including boundaries planted with native tree and shrub species to increase nesting opportunities for birds, alongside grassland creation to provide foraging and commuting habitat for bats, invertebrates and hedgehog. Furthermore, enhancement of the pond in the north of the site is recommended. However, these measures do not appear to be proposed in full. For example, the partial retention of the priority habitat woodland is immediately abutted by the proposed location of residential units, and there does not appear to be inclusion of shrub areas within the General Arrangements Site Plan Landscaping (Wienerberger, 2025, drawing no. WAR-WBR-ZZ-ZZ-DR-A-13302). It is therefore advised that effort should be made to retain all priority woodland habitat, and to incorporate a buffer between the residential units and the woodland and a fence along the woodland periphery to deter public access. The HDC Arboricultural Officer should also be consulted to comment on incursion of individual tree and woodland RPAs and certainty of

retention. The landscaping strategy should also include a variety of vegetation as listed above. The planting palette and their composition will be required in the HMMP, with the expectation that some of the plants selected provide for the protected species groups above and are of native and local provenance.

It is noted that the development scheme now proposes planting of mixed scrub along the periphery of the woodland, which is welcome. The mixed scrub should comprise spiky species to act as a deterrent to accessing the woodland. Consistency across documents within the Reserved Matters application with regards to the landscaping in the buffer area is expected.

2.1 It is noted that the proposed area of off-site BNG overlaps with one of the reptile receptor sites. Given that this area is proposed to be returned to woodland, it may be better to explore translocating reptiles to the larger opening that is marked for grassland enhancement and pond creation. Further information should also be forthcoming on how the off-site BNG is additional to the mitigation.

One of the proposed receptor sites has now been relocated to the off-site grassland area. The enhancements for the purpose of reptile mitigation in the off-site BNG area involve installation of hibernation refugia and grassland management regime. As such, the enhancement of the grassland type and condition can be considered additional to this mitigation for the purposes of achieving BNG. Concern resolved, with thanks.

2.2 In the absence of a draft HMMP, further information is requested on how on site other neutral grassland will reach the classification and moderate condition, and how trees to be planted will achieve moderate condition, with reference to the condition assessment criteria and management techniques. This is to assure HDC that the habitat enhancement proposals are appropriate and feasible.

A draft HMMP has now been provided which is positive. Concern resolved, with thanks.

Draft HMMP

3.0 No draft HMMP has been provided, however as the on-site proposals are not considered significant, a full HMMP has been requested to be secured by condition. It is advised to review Natural England's HMMP checklist, template and companion document for expected content. It is requested that INNS removal management (including cherry laurel) is also included in the HMMP.

3.1 Draft HMMP now received. Please amend Table 6 to state that 0.028km of native hedgerow is being created off-site.

3.2 Please include details of staggered row planting for hedgerows in Section 5.

3.3 Please maintain the approach throughout the entire HMMP that herbicide must be used only as a last resort, unless eradicating invasive non-native species listed under Schedule 9 of the Wildlife and Countryside 1981 (as amended). Wording will need amending in several places to reflect this.

3.4 Please ensure that habitat classifications are consistent throughout the HMMP. There are several instances where the incorrect hedgerow type is referred to.

3.5 Please remove reference to other woodland; mixed under Section 8.3, as this is not present within the metric.

3.6 Please refer to removal of cherry laurel.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative

Scenario 1: BNG Required

Condition

Habitat Management and Monitoring Plan (HMMP)

Pre-Commencement Condition:

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:	27/05/2026 03/07/2026