



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land North West of Southwater
DESCRIPTION:	Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure.
REFERENCE:	DC/26/0366
RECOMMENDATION:	Modification / No objection, subject to receipt of RCA Surveyor Qualification Certificate (Southwater site) Objection (Christs Hospital site) (Site now removed)
SUMMARY OF COMMENTS & RECOMMENDATION: Many comments have been addressed, which is positive. Evidence of RCA surveyor qualification is requested due to absence from the Cartographer Public Register. Further amendments relating to the footpaths and SuDS within the ancient woodland buffer, as well as the composition of the buffer, are requested at Reserved Matters. Comments relating to habitat management still stand and will be expected to be addressed in a future HMMP. Please also note comments relating to the published West Sussex Local Nature Recovery Strategy and strategic significance which will need addressing to discharge the deemed biodiversity gain condition. The biodiversity metric demonstrates that the development will have an overall 36.86% net gain (+129.40 units) in area habitat, a 5.66% net gain (+5.63 units) in hedgerows, and a 28.02% net gain (+2.69 units) in watercourses. However, there are requests for information and potential amendments pertaining to the baseline assessment and advised amendments relating to the post-development layout. The objection to the Christs Hospital site is based on impacts on irreplaceable habitats.	

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 ~~37.18%~~ **36.86%** net gain (~~+132.79~~ **+129.40** units) in area habitat, a ~~5.75%~~ **5.66%** net gain (~~+4.69~~ **+5.63** units) in hedgerows, and a ~~25.55%~~ **28.02%** net gain (~~+2.29~~ **+2.69** units) in watercourses. As per HDC's definition, the proposal is considered significant on-site BNG and therefore, 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.

It is understood that the extent of hedgerow creation has not been inputted at this stage, as this is yet to be confirmed and are not shown on parameter plans. It is noted that to achieve a 10% in hedgerows, it is proposed that 140m of species-rich native hedgerow with trees, associated with a bank or ditch, 110m of species-rich native hedgerow, and 250m of native hedgerow will need to be created. However, please see point 1.1 below which may change these recommendations.

Southwater Site

Baseline

1.1 Many of the hedgerows are recorded as native hedgerows within the metric and on the UKHab maps within the BNG Technical Note (HDA, 2026). However, the classification does not match those mapped within the Hedgerow Survey ES Appendix 8.5 map (Appendix B, HAD 2022), that details several hedgerows comprising 5 or more woody species, which would result in the classification being species-rich native hedgerows. Species-rich hedgerows hold a greater biodiversity value within the metric. Please can the hedgerow classification be reviewed and confirmed.

This has been actioned. Concern resolved, with thanks.

1.2 Ponds have been mapped on the UKHab maps outside of woodland; however, the condition assessment appended to the BNG Technical Note has not considered Criteria H and I. Please can these be added.

Concern resolved, with thanks.

Further, one pond has been entered as moderate condition within the metric, however there is no indication of a pond scoring 5 or above for woodland ponds. Please can this be clarified.

This has been amended in the metric. Concern resolved, with thanks.

1.3 One parcel of mixed scrub has been entered as poor condition; however, the submitted condition assessment sheets only indicate a score of 3 (moderate). Please can this be clarified.

This is for the Christs Hospital site which has since been removed from the proposals and therefore is no longer relevant.

1.4 Tall Ruderal has been entered within the metric as being in moderate condition, however the condition assessment indicates a good condition (score of 3, including essential Criterion C). Please can this be clarified.

The condition assessment has been amended to now fail criterion A, with a different description in the notes to the previously submitted BNG technical note. This gives a score of 2 (moderate condition).

1.5 It is noted that the condition assessment sheet for woodland has been cut off, and is missing condition criteria L and M. Please can these be added.

These have been provided. Concern resolved, with thanks.

1.6 It is noted that the condition assessment sheet for hedgerows have been cut off, and do not detail which criteria have been passed and failed. Please can these be added.

These have been provided. Concern resolved, with thanks.

1.7 Please can details of the RCA methodology, qualified surveyor and MoRPH5 locations be provided (note the GPS is missing from the condition sheets). Note that all areas of watercourses within 10m and ditches within 5m of the red line boundary should also be caught within the RCA assessment.

Information relating to the qualified surveyor has been provided, however the surveyor cannot be found on the Cartographer Public Register. Please can this be added or a certificate provided.

Grid references for the subreaches have now been added to the condition assessment sheets, with thanks.

Post development

2.0 It is understood by comparison of the pre- and post- Cartographer outputs that the proposed enhancements include:

a) improving the bank face artificial bank profile extent of river section 1 of the southern watercourse, resulting in an overall change in condition from fairly poor to moderate; and

b) improving the bank face artificial bank profile extent of river sections 1, 2 and 3, improving the bank top managed ground cover for section 2, and improving the bank face natural bank profile extent and profile richness for section 3 of the northern watercourse. These enhancements will result in section 3 being enhanced from a fairly poor to moderate condition.

Section 8.6.154 of the ES states that these enhancements are to be done by cessation of livestock poaching on the stream margins; selective thinning of overshadowing vegetation to increase light levels along margins, and encourage the establishment of more diverse wet grassland and aquatic and marginal vegetation habitats, removal of existing culverts where these are no longer required, and design of a hydrological scheme and management strategy that would result in higher water levels within the streams and continuity of flow. Details of such management will be expected in any forthcoming HMMP. It should be noted that the removal of culverts is not currently reflected in the metric.

The metric currently accounts for removal of encroachment. However, the metric will need to account for any installation of headwalls on watercourses and/or ditches as part of the drainage strategy, that results in increased watercourse encroachment as per the metric user guide.

The above has been acknowledged and the relevant information will be provided in the forthcoming HMMP and metric.

2.1 Installation of hardstanding for the PROW within the ancient woodland and its buffer zone as detailed within the DAS is not supported, and it is recommended the PROW is realigned to the other side of the buffer zone. Ideally, given the proximity of pathways,

the PROW would be realigned to merge with the pathway adjacent to the carriageway verge for this section only, to reduce gaps between the canopies. It is recommended that tree species that tend to have a large horizontal canopy spread are planted either side of the carriageway (5.5m in width) to ensure canopy connectivity. Tree species to consider may include *Tilia cordata*. To assist with planting, verges could be 3m in width with the removal of the additional pathway as aforementioned.

The ecologist has stated that no hardstanding will be within ancient woodlands or their buffer but rather made of a sympathetic material. The concern was not in relation to the material, but the presence of footpaths within the buffer in general, however a sympathetic material would be preferred if deemed acceptable. The buffer is to prevent recreational access and damage to the ancient woodland, and therefore footpaths in the buffer defeats this purpose. Hence the request to move the footpath outside of the buffer to help minimise this impact. Any new and additional footpaths outside of existing PROWs within the buffer is not supported.

It is acknowledged that the PROW will be realigned through the ancient woodland, and as such to mitigate impacts on the ancient woodland, the applicant has agreed to fence off this route to deter the public straying from the path. This is a welcome approach, providing the PROW cannot be rerouted to outside of the ancient woodland which would avoid the impact in line with the mitigation hierarchy.

The comment relating to canopy spread across the carriageway is supported by the ecologist, and further detail will be expected at Reserved Matters.

2.2 The UKHab post-development maps do not currently show planting of a buffer around the entire periphery of the ancient woodlands. Please can this be clearly amended.

The purpose of having a mixed scrub buffer with spiky species is to deter public access, particularly given the large quantum of houses and thus increased pressure. As such, this is expected to extend around the periphery of the woodland, for which currently there are grassland habitats that will not quite meet the same purpose. To retain the open space appearance of grassland, it is suggested that a gradual ecotone be created – for example, approx. 5m of scrub planting transitioning into a grassland edge. Alternatively, woodland planting in accordance with the West Sussex Local Nature Recovery Strategy would be supported, which will also receive unit uplift within the metric.

2.3 Attenuation features as part of the drainage strategy are not supported within any ancient woodland buffer zone, contrary to section 8.6.36 of the ES.

The response details that SuDS can be approved if they do not affect RPAs and any change in the water table does not negatively affect the ancient woodland. It further states that, except for a short section of swale, all SuDS will be located more than 15m from the woodland edge. Having discussed with the HDC Arboricultural Officer, The Tree Removal Plan (Ruskins, 2026, drawing no. TRP Rev 1) shows that the two basins near the Ancient Woodland at Courtland Wood are mostly located outside the standard 15m ancient woodland buffer, except at two points where the SuDS are only approximately 11.75 m from the woodland edge, and as little as 2.25m in one area – note the plan does not include a scale bar. As no veteran trees have been identified along the woodland edge, the root protection areas (RPAs) of trees within the ancient woodland would be capped at 15m in accordance with BS 5837, where tree size justifies this. To support the SuDS in the 15m buffer evidence should be provided to demonstrate that this feature is not located within the RPA of any woodland edge trees, particularly where more significant mature trees are concerned, and any such hydrology changes will not impact the ancient woodland. Based on the submitted plans, the section near the road is likely to fall within the RPAs of one or more woodland edge trees, as it is only 2.25m

from the woodland edge. This element should therefore be relocated further to the north.

2.4 If pedestrian pathways and cycle lanes through habitats are comprised of an artificial surface, this must be reflected in the metric and on the post-development habitat maps. Roadways within the development comprising of hardstanding also need to be reflected in the post-development UKHab map. Road verges surrounding residential plots should comprise modified grassland as these are likely to be subject to increased recreational pressure.

This will be expected at Reserved Matters. The current assumptions are acceptable.

2.5 Please can the allotment area be added to the metric.

Concern resolved, with thanks.

2.6 It is recommended to review any published West Sussex Local Nature Recovery Strategy prior to submitting the Biodiversity Gain Plan, as the rules relating to strategic significance will apply for all applications that have not yet discharged the deemed biodiversity gain condition.

Now published. It is noted that the strategic significance of certain habitats has been amended, however this will need further amendment prior to discharging the deemed biodiversity gain condition. The priorities largely relate to woodland habitat, and therefore justification will need to be provided as to how the amended strategic significance for watercourse enhancements qualify under priority W1.6 (enhancement of wet woodland) and W1.8 (enhancement of priority woodland), with reference to the metric user guide. A medium strategic significance can no longer be used, as per the metric user guide, and all baseline habitat is automatically considered as low strategic significance.

Christs Hospital Site

Post development

3.0 The development will comprise of wholly hardstanding and removal of a veteran tree. It does not appear that a bespoke compensation strategy has been offered in support of the tree's removal and therefore is not compliant with Policy 193(c) of the NPPF.

3.1 The site is directly adjacent to a Local Wildlife Site (Sparrow Copse) comprising ancient woodland. A buffer zone of minimum 15m should be incorporated and vegetated to mitigate against adverse effects.

3.2 Section 8.2.7 of the PEA for the Christs Hospital (Appendix 8.4 of the ES) mentions drainage into the ancient woodland, connecting with the watercourse. Further details are therefore requested.

3.3 The metric does not provide detail by site, which is requested in any forthcoming updated versions for review.

This site is no longer to be developed, and therefore the above points 3.0 – 3.3 are no longer relevant to this application.

Draft HMMP

4.0 No draft HMMP has been provided as per HDCs local validation list. The proposed target condition criteria have been provided, but a high-level summary of

management to achieve them is absent. It is at the discretion of the Case Officer as to whether this information is submitted prior to grant of any permission. Given the proposal of priority habitat, I would urge this information to be forthcoming. A full HMMP will be a requirement of the legal agreement. It is advised to consult Natural England's HMMP template and checklist for a comprehensive list on levels of content expected.

[Comment still stands.](#)

ANY RECOMMENDED CONDITIONS:

If minded to approve –

Informative

Scenario 2: BNG Required + Phased Development

Additional text relating to irreplaceable habitat (from Scenario 3) may also be added.

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	01/04/2026 30/06/2026