



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land Off Old Crawley Road Faygate West Sussex
DESCRIPTION:	Outline Application for a development of up to 120 dwellings (including 45% affordable) with all matters reserved except for access.
REFERENCE:	DC/26/0671
RECOMMENDATION:	Holding Objection / Modification / More information
SUMMARY OF COMMENTS & RECOMMENDATION: The metric calculation tool submitted currently demonstrates that the development will have a +43.77% net gain (+4.33 units) in area habitats and a +65.45% net gain (+1.96 units) in hedgerows. However, a holding objection is recommended on the grounds of the omission of the individual trees within the baseline assessment. Clarification is requested with regards to the ditch network on and adjacent to the site, and further comments are made relating to the post-development interventions 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 +43.77% net gain (+4.33 units) in area habitats and a +65.45% net gain (+1.96 units) in hedgerows. 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 need 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 of the site appears to miss individual trees present within the west of the site, where the site access is proposed. These trees, T16 – T18 (see Appendix A of the Arboricultural Impact Assessment, Arbortrack Systems Ltd 2026) are proposed to be removed, alongside trees T21 and T21a in the south of the site. These trees appear to be located within the modified grassland area and bracken area marked on the habitat map (Figure 1 in Habitat Management and Monitoring Plan, The Ecology	

Co-op 2026). As such, please can these trees be added to the baseline and marked as lost to the development.

1.1 Section 3.2 of the Ecological Impact Assessment (The Ecology Co-op, 2026) states that there is a ditch bordering the north-west which is dry in parts and has running water towards the western edge and is mapped under habitat classification r1e (canals and ditches) in Figure 10. The Drainage Strategy also includes discharge into the adjacent ditch and culvert (see Figures 2-4 and 2-5 in the Flood Risk Assessment and Outline Drainage Strategy, Aqua Terra Consulting 2026). It is noted that some of the ditch is captured under the hedgerow association, however the metric user guide states that if it meets the definition of a watercourse, then it should be classified within the watercourse module of the metric instead. As such, further clarification is requested as to why this does not meet the watercourse definition of a ditch and the watercourse module is not triggered.

Post-development

2.0 It is shown on the Constraints and Opportunities Plan (Paul Hewett 2026, drawing no. 2126/PL.02) that a footpath through the south of the woodland is proposed to adjoin the nearby PROW. If a footpath here is not already existing, this is not supported given its priority habitat status, as well as the protected species found to utilise this woodland. It also goes against the priorities of the West Sussex Local Nature Recovery Strategy which aims to enhance this woodland and renders the proposed buffer ineffective. If the Case Officer deems that this connection is strictly necessary, then it should go around the periphery of the woodland and should be fenced off.

2.1 It is noted that development of hardstanding (road) is proposed within the barbastelle bat buffer. This should be relocated outside of the buffer.

2.2 Please can clarification be sought if fencing will be installed between the woodland edge and the heathland and shrub planting. The buffer should be planted in such a way to deter pedestrian access to minimise woodland disturbance and deterioration, as well as reducing artificial light illumination.

2.3 The Outline Drainage Strategy (Aqua Terra Consulting 2026, Ref. Figure 7-2) depicts 'grassed conveyance swales' within the proposed woodland planting to the north of the site. The detention basin also appears in a different location to the areas within the habitat maps and Illustrative Masterplan (Paul Hewett, 2026, drawing no. 2126/PL.05) and overlaps with the proposed LEAP. Please can the relationship between the proposed post-development habitats and drainage strategy be further explained.

Strategic significance

3.0 Please note that the West Sussex Local Nature Recovery Strategy 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. This is likely to change the strategic significance levels currently entered within the metric.

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 Like that of woodland creation, it is advised to detail minimum planting individual tree distances for each species, which essential for successful establishment.

4.2 Note that Criterion A does not need to be met for modified grassland to achieve poor condition.

4.3 Information on how periphery hedgerows/line of trees will be retained and managed when adjacent to new woodland planting should be included to prevent mismanagement.

4.4 Please amend the wording with regards to herbicide to reflect it will be a last resort option, except in the case when removing an invasive non-native species as listed under schedule 9 of the WCA 1981.

4.5 Please refer to removal of cotoneaster, cherry laurel and buddleia in the HMMP.

4.6 There are areas of modified grassland proposed immediately adjacent to other neutral grassland. Please can it be made clear in the management prescriptions how to avoid mismanagement of the grassland areas.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative –

Scenario 1: BNG Required

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	22/06/2026