



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Cedar Cottage Sandygate Lane Lower Beeding West Sussex
DESCRIPTION:	Demolition of existing dwelling and erection of 24no. dwellings including the creation of a new access from Sandygate Lane with associated works.
REFERENCE:	DC/26/0640
RECOMMENDATION:	Holding objection No objection (subject to clarification on baseline tree no.)
SUMMARY OF COMMENTS & RECOMMENDATION: There remains discrepancy in the BNG Report re number of trees at baseline. Subject to receiving confirmation on this, I recommend no objection on BNG grounds. However, there is still concern relating to Plot 13s relationship with the boundary vegetation and lack of appropriate vegetated buffer zone (see point 2.0). Further comments are outstanding and should be addressed prior to discharging the deemed biodiversity gain condition. Clarification is requested with regards to trees at the baseline, which should be forthcoming prior to grant of any planning permission. Further amendments are requested with regards to vegetation planting along the boundary, and modification to the assigned strategic significance within the metric is required prior to discharging the deemed biodiversity gain condition. The metric calculation tool currently demonstrates that the development will have a --20.25% net loss (-0.65 units) in area habitats and an increase in 0.68 units for hedgerows) in area habitats. However, there are concerns pertaining to the baseline assessment that need addressing, and further comments are raised regarding the relationship between the layout and the boundary vegetation, and scope for further habitat creation and enhancement on-site in accordance with the Biodiversity Gain Hierarchy. 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 metric calculation tool submitted currently demonstrates that the development will have a -49.62% -20.25% net loss (-1.39 -0.65 units) in area habitats and an increase in	

0.68 units for hedgerows (note a percentage net gain cannot be calculated as no hedgerows were identified within the baseline assessment). As there is no net gain on-site, **this cannot be considered as significant on-site BNG and therefore a legal agreement to secure on-site proposals is not required.** However, there are current concerns with the baseline assessment, and there is scope for further on-site delivery in accordance with the biodiversity gain hierarchy, which are likely to alter the final BNG calculation figures – please see the comments below for further detail.

Baseline

1.0 6x individual trees in the garden have not been recorded at baseline within the metric as per the metric user guide (see Appendix 1 Baseline Habitat Plan within the Biodiversity Net Gain Assessment, Arbtech 2026). Further justification is therefore requested for their omission (please see page 60 of the statutory biodiversity metric user guide on recording medium+ size class trees within private gardens, and the Tree Schedule within Arboricultural Implications Report, SJA Trees 2026).

Page 8 of the updated BNG assessment states that 2x medium trees (T4 and T5) are now included within the baseline, with the metric accounting for 2x small, 2x medium and 1 very large tree. However, it is stated that there are three trees within the field (comprising 2x small and 1x very large), but later details five trees. Individual trees not associated with any other habitat, irrespective of size, need to be inputted in the metric. A further 13 trees (and 2 groups, comprising all small trees) are identified within the vegetated garden, and of these 10 are small and 2 are medium (totalling 12). As such, it appears that 3x trees are not accounted for in the description. Please can detail be provided as to the size of the remaining 1x tree, and the other 2x trees in the field as mentioned.

The text on Page 8 has been amended to detail:

- 11x small trees and 2x medium trees in vegetated garden

The text still refers to '2 out of 5 trees' within the field but only provides detail of 3x trees. It assumed this is in error, however, please can clarification be sought.

Confirmation has been received that the 5x trees are in relation to the total no. Concern resolved, with thanks.

It is noted that 0.0041ha is marked as retained, equivalent to 1x small tree (identified as T2). However, given the proposed layout, it is not understood how this tree will be retained, particularly with the creation of native hedgerow now proposed. Please can this be clarified.

It appears that the private garden has been shortened to allow for retention of this tree.

1.1 It is noted that no boundary vegetation is included within the BNG assessment. Confirmation is requested on whether any of the boundary vegetation (hedgerows, trees etc.) are within the applicant's ownership.

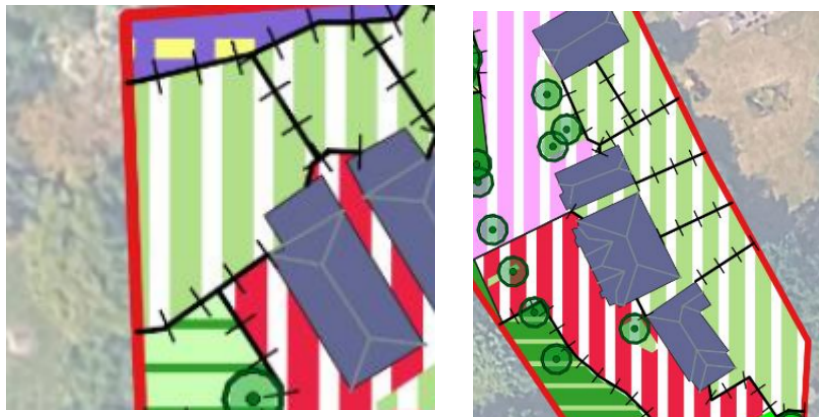
It has been confirmed that the boundary vegetation is not within the applicant's ownership. Concern resolved, with thanks. It is therefore important to not cause any deterioration of this habitat (see point 2.0 below).

Post-development

2.0 As it stands, the layout results in many of the residential gardens backing on to the boundary vegetation and being located within multiple tree RPAs (see the Tree Protection Plan, drawing no. SJA TPP 25319-041 within the Arboricultural Implications Report, SJA Trees 2026). The certainty of retention in their current condition cannot be guaranteed. It is therefore advised to seek comment from the HDC Arboricultural Officer

regarding their retention. There is also the likely additional impact of increased artificial illumination of the boundary vegetation from garden lighting and light spill from dwellings. As such, it is requested that the layout be modified to respect the boundary tree RPAs (including a min. 1.5m buffer from hedgerows) and further planting along the boundary is implemented to mitigate impacts of artificial lighting (alongside those listed in Bat Emergence and Re-Entry Survey Report, Arbtech 2026).

Whilst efforts have been made to plant hedgerows behind the residential private gardens that face the boundary vegetation, which is positive, maintenance strips will need to be considered, and this approach is not applied to all private gardens abutting boundary vegetation (please see screenshots of the post-development habitat plan (Appendix 2 of BNG Assessment) below). Such measures should also be applied in these areas for the reasons mentioned above, crucially minimising artificial lighting illumination of boundary vegetation.



This has largely been addressed, with nearly all plots having a vegetated buffer with maintenance strips to the rear, which is welcome. Further reasoning is requested as to why this does not extend along the western boundary of Plot 13 (as above, pictured on left). It is noted that this tree is sizeable, and therefore the buffer along this edge should be greater.

2.1 Further enhancements on-site in accordance with the recommendations within the Preliminary Ecological Appraisal and Roost Assessment (Arbtech, 2025) are requested. This includes grassland enhancement and wildflower planting which will benefit the local invertebrate assemblage, and creation of native scrub which will benefit multiple protected and priority species. This is in greater accordance with the Biodiversity Gain Hierarchy and will provide for locally recorded species. Creation of ecotones from the boundary vegetation (i.e., from hedgerow/woodland to scrub to grassland) will provide a great benefit to biodiversity. This would be complementary to the proposed layout amendment advised in point 2.0. The retention/creation of an area of modified grassland for recreational use is supported.

The BNG plans have been amended to incorporate creation of wildflower meadows, scrub and hedgerow areas, in addition to tree planting across the site. These amendments are welcome.

2.2 It is noted that the Indicative Landscape Plan (OSP Architecture, 2026) and the BNG Post-Development Habitat Plan (Appendix 2 in the BNG Assessment, Arbtech 2026) do not match regarding their habitat creation and enhancement proposals. Please can these be updated so that they are consistent with each other.

A pre-commencement condition has been suggested to align these documents. It is at the Case Officers discretion as to whether this approach is acceptable.

Strategic significance

3.0 The south of the site partially falls within the Wilder Horsham District Nature Recovery Network, and therefore all habitats with a biodiversity value greater than zero at baseline and post-intervention within the southern portion of the site should be assigned as having a medium strategic significance as per HDC guidance which can be found on the HDC BNG webpage. However, please note that the West Sussex Local Nature Recovery Strategy is due for publication in Summer 2026, and therefore strategic significance associated with the LNRS will supersede HDC guidance. The LNRS strategic significance will apply to all applications which have not yet had their deemed biodiversity gain pre-commencement condition discharged, and thus it is advised to refer to the West Sussex LNRS website prior to submission of the Biodiversity Gain Plan.

As the new LNRS has been published, there is no longer justification for using the medium strategic significance category (please see Table 7 in the biodiversity metric user guide). Please can this be amended prior to submitting the Biodiversity Gain Plan and final metric to discharge the deemed biodiversity gain condition.

HMMP

4.0 No draft HMMP has been provided, however as the on-site enhancements are not considered significant and currently propose easily achievable habitats, 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 advised content. The planting palette and their composition within habitats will be required in the HMMP, with the expectation that some of the plants selected provide for the protected species groups identified in the PEA (Arbtech, 2025) and are of native and local provenance.

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:	29/05/2026 26/08/2026 24/09/2026 02/10/2026