



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land North of Rectory Lane Ashington West Sussex
DESCRIPTION:	Outline Application for redevelopment of the site to provide up to 125 dwellings, access, public open space and associated landscaping, drainage and highways infrastructure with all matters reserved except access.
REFERENCE:	DC/26/1186
RECOMMENDATION:	Modification / More information
SUMMARY OF COMMENTS & RECOMMENDATION: As currently submitted, the metric demonstrates that the development will have a +44.11% net gain (+7.56 units) in area habitats, a +11.87% net gain (+3.25 units) in hedgerows and a +16.22% net gain (+0.42 units) in watercourses. However more information is required with regards to impacts on veteran trees on site (as defined by BNG legislation). Further concerns are listed for post-development habitats and content within the draft HMMP, which require additional comment and modifications.	
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 +44.11% net gain (+7.56 units) in area habitats, a +11.87% net gain (+3.25 units) in hedgerows and a +16.22% net gain (+0.42 units) in watercourses. 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 the below comments may result in modifications that will alter the final BNG calculated figures. <u>Baseline</u> 1.0 It is noted that 8x veteran trees (irreplaceable habitat) were recorded on-site as defined by the BNG legislation (and 1x also included by NPPF definition). To ensure there is no deterioration on these trees and additional disruption to wildlife commuting corridors across the site, it is advised to adhere to the recommended buffer zones in government guidance which should be at least 15x larger than the diameter of the tree,	

or 5m from the edge of the tree's canopy if that area is larger. Such confirmation is requested. An artificial lighting strategy to be secured by condition should also ensure no illumination from the adjacent residential parcels. In the absence of either of these mitigation efforts, it cannot be certain that no deterioration on these veteran trees will occur as a result from the development, and as such if the Case Officer is minded to approve the application, it is advised to seek comment from the HDC Arboricultural team and a bespoke compensation strategy may be required.

Post-development

2.0 Please provide post-intervention RCA positive/negative indicator outputs.

2.1 There is no baseline loss of watercourse to account for the increased watercourse encroachment within the creation tab, and the created watercourse entry does not account for the increased watercourse encroachment, but rather only the reduction in riparian encroachment on one bank due to enhancing grassland. Please can this be amended.

2.2 Once finalised, please can the post-development plans be finalised and parcels differentiated by those habitats as entered in the metric (e.g. pond, vegetated garden, hedgerow types, traditional orchard) for the purposes of future monitoring. This will need to be included in the HMMP.

2.3 It is noted in the ASN2 Draft Allocation Concept Masterplan appended to the Planning Statement and Section 5.5 of the BNG Report that gaps in the on-site hedgerows H1 and H5 are indicated to connect to adjacent land. Please can any such gaps be shown on the post-development habitat map or clearly keyed.

2.4 It is noted that under Section 24 (Planting Coding) of the Design and Access Statement Part 5, *Liriodendron tulipifera* and *Ligustrum ovalifolium* are considered native and proposed within the open space to the north of the site. These are not considered native, and thus please only plant within residential parcel as amenity planting (please move to this table). Non-native species proposed around SuDS should only be located on the northern side, closes to that of the residential parcels.

2.5 Please note that the indicative location of the children's play area in the Outline Masterplan (Urban Place Lab, 2026) is marked to the immediate north of the leftmost SuDS basin and the indicative active travel route. However, the BNG post-development habitat plans indicate this area is where traditional orchard is to be planted, and the children's play is immediately adjacent to the retained ecologically valuable line of trees. It is recommended for the play area to be as indicated in the Outline Masterplan, with relocation of the traditional orchard to other areas of the site to minimise disturbance from nearby play. Consistency across documents will be expected at Reserved Matters.

Strategic Significance

3.0 It is noted that the ACIB layer of the West Sussex LNRS. However, as this is not habitat specific, this cannot be used for assigning strategic significance in accordance with Table 7 of the biodiversity metric user guide. It is agreed that a small section of the site falls within priority R1.6 (Buffer strips along rivers and streams) of the LNRS. As such, as this priority is being delivered as part of the development scheme through change of habitat from arable land to other neutral grassland etc, it is accepted that high strategic significance can be afforded to the watercourse habitat. However, it cannot then also be assigned to the hedgerow and grassland habitats, as this is considered double counting the uplift and the priority in the LNRS does not apply to these specific

habitat types. Please note that all baseline habitats must have a low strategic significance. Please can amendments be made to the metric in accordance with the above.

HMMP

4.0 A final HMMP will be required to discharge the deemed biodiversity gain condition and S106 obligation.

4.1 Box PM-B01 states that 87x new trees are proposed throughout the site, however user comments in the metric entry state that 105x new trees are proposed in the open space area. Please can the correct number be confirmed.

4.2 Please also include species-rich native hedgerow with trees – with associated bank or ditch in table PM-T01.

4.3 As the proposed species mix comprises yellow rattle, an early spring cut for ONG may be necessary for the short sward required for germination. Annual chain harrowing is not supported as it can disrupt established root and fungi networks and burrowing insect populations. In addition, it can potentially open gaps for undesirable species. Therefore, it is recommended to harrow only every 2-3 years or on an as-needed basis.

4.5 Herbicide use is not supported as a primary method, and manual/mechanic techniques should first be adopted prior to herbicide as a last resort (unless eradicating species listed under Schedule 9 of the Wildlife and Countryside Act 1981, as amended). Please can wording aligning with this approach be incorporated throughout the HMMP.

4.6 It is requested that honeysuckle, *Lonicera periclymenum*, is added to the hedgerow mix for the multiple benefits to pollinators and night-time flying insects (and subsequently bats), and dormice.

4.7 It is advised that the hedgerow cutting and other prescriptions are undertaken outside nesting bird season (i.e., September – February), as identified in Table HD-T01 above. Taking a precautionary approach with regards to roosting bats should also be mentioned with regards to works on trees.

4.8 Condition criterion A for individual trees cannot apply to street trees, as the proposed species in the DAS Part 5 are non-native ornamentals. As such, the metric and/or soft landscaping plans will need amending with regards to the achievable overall target condition, if proposed species mixes unchanged at Reserved Matters.

4.9 It is recommended that failed individual trees are to be replaced on a 1 for 1 basis within the next planting season. This is because individual trees are counted wholly when contributing towards BNG (converted to hectareage), unlike no. of whips in hedgerow or scrub for example which contribute by length/area instead.

5.0 Please include management for SuDS and rain gardens to achieve their proposed overall target condition as entered in the metric.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative –

Scenario 3: BNG Required + Irreplaceable Habitat

NAME:

Linsey King
Ecology Officer (Planning)

DEPARTMENT:

Strategic Planning - Specialists

DATE:

15/09/2026