



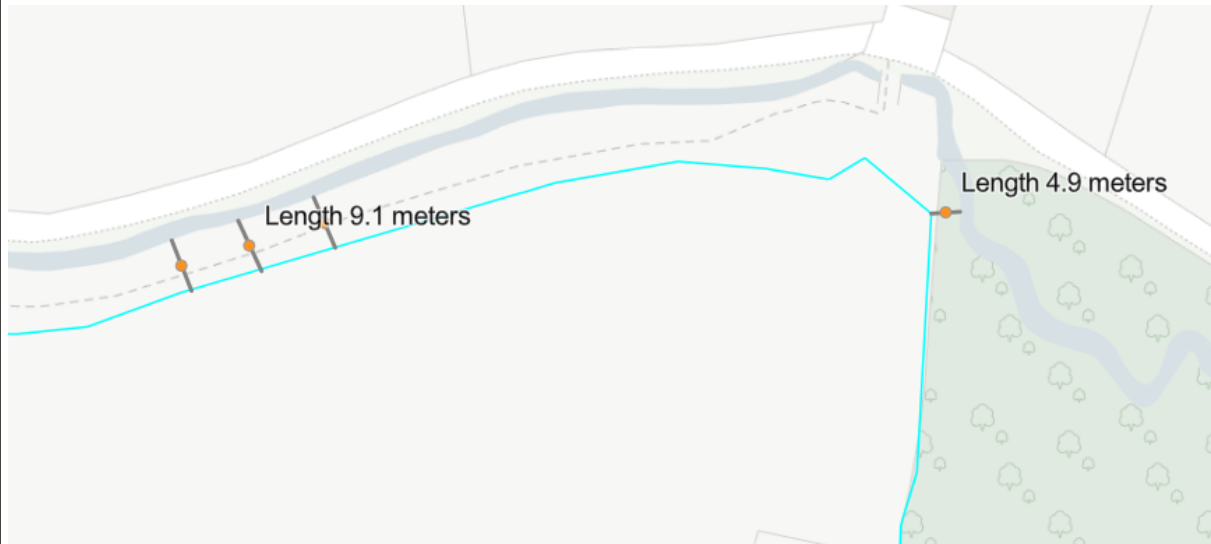
Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Mowbray Employment Park Horsham West Sussex
DESCRIPTION:	Outline planning application (all matters reserved) to provide an Employment Park comprising flexible commercial, industrial and logistics uses (Use Classes E(g), B2, B8), healthcare (Class E(e) including pharmacy) and commercial leisure.
REFERENCE:	DC/26/1240
RECOMMENDATION:	Holding objection / Modification
SUMMARY OF COMMENTS & RECOMMENDATION: The submitted metric demonstrates that the development will have a -61.99% net loss (-21.80 units) in area habitats and a -100% net loss (-1.72 units) in hedgerows, but as the calculation cannot fully account for the post-development habitats due to several masterplan options presented, these figures are likely to change. Due to the on-site BNG (at present) being considered as non-significant, a legal agreement is not recommended to secure habitat delivery. However, as not all the post-development habitats can be included in the calculation yet, it is possible the final BNG figures may exceed the significance threshold once the layout is determined. It is recommended that the metric be updated to reflect at least one of the indicative layout options to give a better estimate of final BNG figures. Comments made pertaining to the watercourse module requires further information prior to grant of planning permission. Additional points are raised with regards to the indicative layouts and associated green infrastructure which should be considered and addressed at reserved matters.	
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 -61.99% net loss (-21.80 units) in area habitats and a -100% net loss (-1.72 units) in hedgerows. In accordance with HDCs significant on-site criteria, the proposed on-site BNG is not considered significant, and therefore a legal agreement to secure is not required. However, please note the below comments may result in modifications that will alter the final BNG calculated figures and subsequently overall on-site significance.	

Baseline

1.0 There are instances in the north-east of the site where the red line boundary is within the riparian zone of the watercourse (i.e. within 10m of the bank top). As such a River Condition Assessment will be required and the watercourse module of the metric completed. Alternatively, the red line boundary may be amended to be outside 10m of any mapped watercourse, to ensure no adverse impacts on the watercourse and no watercourse module requirement in the metric.

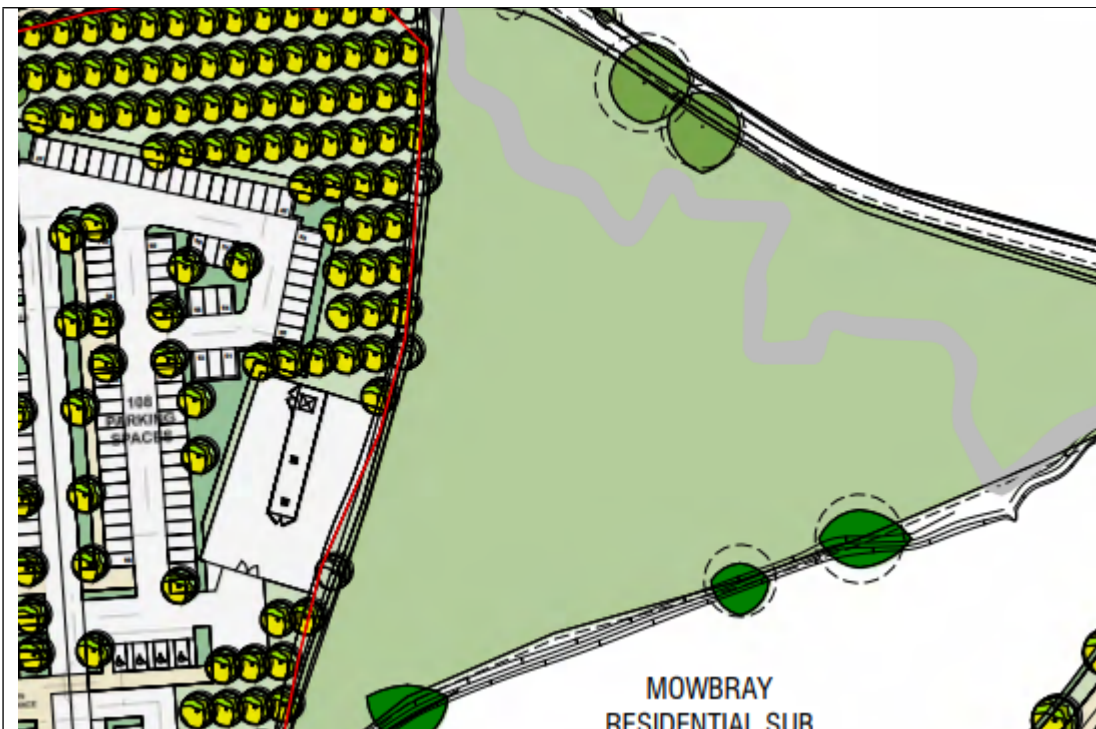


Post-development

2.0 It is apparent from the multiple option indicative masterplans that tree and hedgerow/introduced shrub planting is proposed across the site. It is therefore envisaged that prior to discharging the deemed biodiversity gain condition, the metric will be amended to add in these enhancements (however earlier is recommended). Please can this also be translated onto a post-development habitat map, as it is not currently clear what habitats are proposed where on the site.

2.1 It is recommended that proposed hedgerows are a continuous length rather than several short ones where possible, to enhance connectivity across the site. It is also recommended that trees are not planted over underground utilities, such as drainage infrastructure, to ensure long term survival and minimise damage if future maintenance is required.

2.2 It is strongly advised not to erect any buildings or hardstanding immediately adjacent to the priority woodland habitat to the north-east of the site, as identified on Natural England's Priority Habitat Inventory. Please see screenshot below from the proposed Option 2 Illustrative Masterplan (it is not fully understood what this building is proposed to function as). This location is not supported, due to introduced impacts on the woodland edge such as shading, change in microclimate, and compaction of edge tree root network. The other options are better in this respect, with a green infrastructure buffer comprising native species being supported along the woodland boundary.



Strategic significance

3.0 Please note that the site is partially highlighted as an area for several priorities within the West Sussex Local Nature Recovery Strategy. Specifically, the priorities are W2.1 (create new woodland), R1.1 (renaturalise rivers and floodplains), R1.2 (improve in-river connectivity), R1.3 (enhance in-river/riparian habitats), and R1.6 (buffer strips along rivers and streams). At present, the north-east of the site is eligible for strategic significance uplift in the metric for the woodland creation, providing this is what is depicted in the illustrative masterplans.

HMMP

4.0 It does not appear that a draft HMMP has been submitted, as per HDCs local validation list. However, it is considered appropriate to condition the final HMMP as the current proposal is not considered significant on-site BNG. **However**, this is subject to change (see above points). Please consult Natural England's HMMP template, companion document and checklist for expected content.

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:	17/09/2026