



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land North of Melton Drive Storrington West Sussex
DESCRIPTION:	Outline application, with all matters reserved, for the phased development comprising: Phase 1 construction of the access road (to be delivered through a subsequent Reserved Matters Application pursuant to Outline Permission DC/24/2006); and Phase 2 residential development of up to 56 dwellings with associated landscaping, pedestrian and vehicular access.
REFERENCE:	DC/26/1168
RECOMMENDATION:	Holding objection / Modification / More information
SUMMARY OF COMMENTS & RECOMMENDATION: The submitted metric currently demonstrates that the development will have a -7.77% net loss (-2.08 units) in area habitats and a +16.09% net gain (+0.05 units) in hedgerows. However, a holding objection is recommended because the BNG assessment does not currently cover the entirety of the site within the red line boundary, and there are discrepancies regarding trees at baseline within the metric and BNG report. These should be rectified prior to grant of planning permission. Further comments are made relating to the post-development habitats and HMMP, which should be resolved prior to discharging the deemed biodiversity gain and HMMP conditions.	
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 -7.77% net loss (-2.08 units) in area habitats and a +16.09% net gain (+0.05 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. It is noted that this is a proposed phased development and therefore an Overall Biodiversity Gain Plan, detailing how the development will reach the minimum 10% BNG,	

will need to be submitted to discharge the deemed biodiversity gain pre-commencement condition. Additionally, prior to any Phase commencing, a Phased Biodiversity Gain Condition must be submitted to HDC detailing how that individual phase contributes towards the overall minimum 10% BNG.

Baseline

1.0 BNG must be applied to the whole red line boundary, including that within the consented outline application site to the west. There is no mechanism within the BNG legislation to omit this, and it is not considered double counting (as mentioned within the Planning Statement). However, the post-development habitats must be the same across applications when discharging the deemed biodiversity gain conditions.

1.1 The Biodiversity Impact Calculation report (The Ecology Co-op, 2026) states that 8x moderate and 5x good condition trees will be retained. However, only trees of moderate condition have been entered in the metric at baseline. Please can this be clarified, and the condition assessment sheets for individual trees submitted.

Post-development

2.0 Please map where the enhanced bramble scrub to mixed scrub is on Figure 3 in the Biodiversity Impact Calculation report. This will also need to be in the final HMMP.

2.1 Please confirm if any retained trees will be absorbed into private curtilage. If yes, these must be accounted for as lost as the new habitat is vegetated garden.

2.2 It is strongly advised to seek HDC Arboricultural comment on the retained trees adjacent to gardens, particularly in the south of the site. If it cannot be certain that the current development layout will not cause any loss or deterioration of these trees, then I request to be reconsulted as it is likely that these trees will have to be accounted for as lost or subject to a reduction in condition within the metric.

2.3 Please add parcel references to the separate line of trees habitats on the baseline habitat map and within the metric so it is clear which section is being enhanced.

2.4 SuDS are proposed where a tree is marked as retained in the post-development habitat map. The SuDS should be outside of retained tree RPAs to avoid engineering works causing severance to the root network. Please can this be confirmed to assure HDC of the tree's retention in its current condition.

2.5 Please complete the entry within Tab A3 where the strategic significance is missing (row 16).

2.6 It is noted that hedgerow planting is proposed within the main residential area on the Landscape Strategy. Please can these be added to the metric.

Draft HMMP

3.0 A final HMMP will be required to discharge the recommended HMMP condition. It is advised to consult Natural England's HMMP template, companion document and checklist for expected content.

3.1 It is advised to undertake a March cut for other neutral grassland habitats if the sward has grown significantly, to ensure yellow rattle germination.

3.2 Please detail timeframe for arisings removal for other neutral grassland habitat.

3.3 The bramble scrub may need to be thinned or cut back prior to planting whips for mixed scrub creation to prevent over competition.

3.4 It is recommended that cut bramble does not get buried when preparing for sewing of grassland and should instead be removed from site to avoid reestablishment in these habitats.

3.5 Please include mulching for planting of individual trees.

3.6 Please refer to taking precaution when undertaking tree works with regards to roosting bats.

3.7 Please include removal of silt for SuDS if required.

3.8 With regards to remedial actions, please note that any failed individual trees should be replaced in the next planting season irrespective of how many years has passed.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative –

Scenario 2: BNG Required + Phased Development

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:	15/09/2026