

Our ref: 6612 008 let consultee response

12 June 2026

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Sent By E-Mail Only

Dear Linsey,

Thakeham Mushrooms, Storrington Road, Thakeham, Pulborough –Planning Application DC/26/0266

Aspect Ecology is advising the applicant in regard to ecological matters in respect of the above application. In this regard we have been passed consultation responses from Horsham District Council Planning Department (dated 26th March 2026) and NatureSpace (dated 19th March 2026), which relates to ecology and Biodiversity Net Gain.

I am pleased to address these queries overleaf, within the enclosed Tables.

I trust that our comments provide a full and helpful response to the queries raised, and assist Horsham District Council with positively assessing and approving the proposed scheme. Should you have any queries please do not hesitate to contact me.

Yours sincerely



Andy Holyoak
Associate
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Encl. Responses to WDC and NatureSpace comments
Example Butterfly Bank design



Table 1: Response to Horsham District Council Planning Department dated 26th March 2026

Topic	Comments	Aspect Ecology Response
BNG	"I largely agree with the baseline assessment made of the site. However, I request clarification on why willow scrub has not been recorded in the metric or on the UKHab baseline map despite its mention in Section 4.12 of the Ecological Appraisal (Aspect Ecology, 2026)."	It is recognised that the Scattered/Willow Scrub is included within Section 4 of the submitted Ecological Appraisal (ref: 6612 EcoAp dv5 /AS/AN/AH, dated January 2026). However, upon review, this area of Willow Scrub is no longer located within the line boundary for Phase 1 of the development. Apologies for this error and the subsequent confusion. It is requested that the error concerning Willow Scrub be ignored and the BNG metric and reporting be relied upon with regard to scrub habitats present on-site.
	"A parcel of modified grassland, AG3a, is present on the Pre-Development Habitat Mapping (drawing no. 6612/BNG1, Biodiversity Net Gain Assessment, Aspect Ecology 2026), however has not mention in the condition assessment sheets. Please can further clarity be sought on this. It is also noted that grassland parcel G5 and G6 are not present within Table 3.1 of the BNG Assessment."	Following a review of the submitted BNG report and calculations, the condition assessment for AG3a and b was included within the condition assessment sheets under the column comprising AG1-4. The condition assessment for AG3c was included separate from this as it failed an additional assessment criterion (criterion E). With regard to grassland parcels G5 and G6, due to previous red line boundary changes these areas were removed in previous iterations. As these grassland areas are now included within the line boundary, the BNG report has since been updated (ref: 6612 vf3 AN/AH, dated June 2026) to include such grassland in line with the BNG metric, we apologise for this error and the subsequent confusion.
	"H1 within the metric is classified as species-rich native hedgerow with trees, however conditions E1 and E2 in the condition assessment sheets have not been assessed. This hedgerow is labelled as a species-rich native hedgerow (no trees) on the Pre-development Habitat Mapping. Please can further clarity be sought on this."	It is recognised that hedgerow H1 was incorrectly categorised as a species-rich hedgerow with trees within the submitted BNG metric calculations. Upon review, this hedgerow has been categorised as a species-rich hedgerow within the metric and the two trees (T2 and T3) present within the hedgerow have been included within the calculations as Urban Trees. The BNG metric has since been updated (ref: 6612 BNG Stat vf, dated June 2026) to include such amendments, we apologise for this error and the subsequent confusion.
	"An additional tree line (TL2) is detailed within the condition assessment sheets, however does not appear on the Pre-development Habitat Mapping or within the metric. Please can further clarity be sought on this."	It is recognised that tree line TL2 is included within Appendix 6612/BNG2 (Habitat Condition Assessment Sheets) for the submitted BNG Report (ref: 6612 BNG dv5 /AS/AN/AH, dated January 2026). However, upon review, this tree line is not located within the line boundary for Phase 1 of the development. We apologise for this error and the subsequent confusion and request that the error be ignored.
	"The loss of 4x small trees (0.0163ha) and 6x large trees (0.2199ha) has been	It is recognised that tree T13 was absent from the baseline mapping and reporting therefore the BNG reporting and calculations have been amended to ensure the T13 is included. However, upon



	entered into the metric.”	review, tree T17 is no longer located within the line boundary for Phase 1 of the development as such has been removed from the metric calculations. Apologies for this error and the subsequent confusion. The BNG metric has since been updated (ref: 6612 BNG Stat vf, dated June 2026) to include such amendments, we apologise for this error and the subsequent confusion.
	“The line of trees (TL1) to the south of the site is marked as retained within the metric, however these are marked as removed in the Tree Protection Plan (drawing no. 2142-KC-XX-YTREE-TPP01RevC, Keen Consultants 2023). Please can further information be provided on whether the trees marked as lost account for these trees (see TG1 in condition assessment sheets). If not, please can this be amended within the metric accordingly.”	It is recognised that tree line TL1 was mapped as being fully retained within reporting. However, upon review of the tree removals plan, the length of the TL1 has since been amended within the graphics and metric to incorporate the loss of the eastern section. It was also noted that two trees (labelled as AT1 and AT2) within the tree removals plan had not been incorporated within the BNG assessment as such these trees have also been included as individual urban trees within the calculations and reporting. The BNG metric and reporting has since been updated (ref: 6612 BNG Stat vf, dated June 2026) to include such amendments, we apologise for this error and the subsequent confusion.
	“One Medium size ash tree (DBH 50cm) is proposed to be removed from the hedgerow (H3) (see the Tree Protection Plan). This is present within the condition assessment sheets as in Appendix 6612 of the BNG Report as T2, being in moderate condition. In line with the metric user guide, please can the medium tree be added to the baseline and marked as lost.” “The condition assessment sheets also detail a large tree (T3) in H1 for removal, which does not appear to be included in the baseline assessment. Please can this be added.”	It is recognised that trees T2 and T3 were not included within post-development mapping however, following the amendments for hedgerow H1, tree T3 has been added to baseline and post-development mapping and tree T2 has been included within the baseline mapping and marked as lost to the proposals post-development. The BNG metric and reporting has since been updated (ref: 6612 BNG Stat vf, dated June 2026) to include such amendments, we apologise for this error and the subsequent confusion.
	“Given the scarcity (particularly in the southeast) and high cost of OMH units on the BNG market, HDC will need further assurance that this is deliverable and will meet the JNCC priority habitat description. Further information is requested on why this habitat cannot be retained. Furthermore,	The onsite area of OMH unfortunately cannot be retained within the site, as work to remove adjacent areas of hardstanding cannot be guaranteed to not damage/destroy the onsite OMH. However, given the size of the existing onsite OMH, only a very small area of OMH creation is required within the site, which is readily achievable (delivered in the form of a butterfly bank).



	the current proposal of a ‘butterfly bank’ will not be sufficient as currently described, and it is recommended that any proposed OMH accord with the guidance set out in the West Midlands Combined Authority ‘Brownfield Habitats and Biodiversity Net Gain’ note to meet the priority habitat criteria. Specifically, we want to ensure that the soil will remain nutrient poor, and soil substrates, aspects, topography and hydrology will be varied across the habitat to ensure structural diversity and a mosaic of habitats with different microclimates. No topsoil should be introduced to this area, and it is likely that the upper layer of existing soil will need to be removed and replaced with waste materials, or other friable/aggregate material if the former is not possible. A detailed drawing and material and species composition alongside long-term management will be expected in any forthcoming HMMP. Confirmation is also requested on whether screening or fencing will be implemented along the western boundary to ensure the larger off-site OMH parcel is not subject to heavy recreation.”	In terms of the substrate to be utilised, we can confirm that any topsoil utilised will be buried deep within the butterfly bank, such that suitable species rich grasslands and colonising vegetation will dominate the bank, with bare and exposed soils/gravel adjacent to the bank. Indeed, given the volume of concrete and brick material currently present within the site, it is envisioned that such material can be broken down and incorporated within the bund to ensure the substrate is nutrient poor. An example butterfly bank design is appended to this letter. Finally, with respect to the western boundary treatment, a post and rail fence will be installed.
	“It is noted that there are many pockets of other neutral grassland interspersed with modified grassland. It is envisaged that this may be confusing for management contractors, and therefore the different management practices for different grassland.” types will need to be very clear and signposted within any forthcoming HMMP.	Agreed, and this will be set out within the HMMP.
	“It is not clear where the allotment is proposed to be located. Please can this be marked on the plans.”	It is recognised that allotment habitat was included within the BNG report (ref: 6612 BNG dv5 /AS/AN/AH, dated January 2026) however upon review, this was amended to fruit tree provision therefore it was re-classified as Traditional Orchard within the calculations and report. The BNG report has since been updated (ref: 6612 BNG vf AN/AH, dated June 2026) to include such amendments, we apologise for this error and the subsequent confusion.



	“Scrub planting is proposed immediately adjacent to the hedgerows to the north. Further information is requested on how the retained hedgerow will remain as such, and any management practices to prevent the scrub spreading into the hedgerows.”	Future management will be implemented to maintain a narrow gap between the proposed scrub and the hedgerow, which will offer a sheltered environment for the benefit of invertebrates.
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Table 2: Response to NatureSpace dated 26th March 2026

Topic		Comments	Aspect Ecology Response
Great Newt	Crested	"Could I please therefore request some detailed photos which demonstrate the current state and extent of the different habitats onsite, if these could also be labelled in some way to explain where they are this would be really helpful"	Environmental DNA surveys have confirmed absence of Great Crested Newts, and so further consideration of terrestrial habitats is, in this instance, not required. However, as requested, a photo sheet (ref: Appendix 6612/Table2.1, dated June 2026) and a corresponding photo location plan (ref: 6612 PL1, dated June 2026) have been appended to this letter.

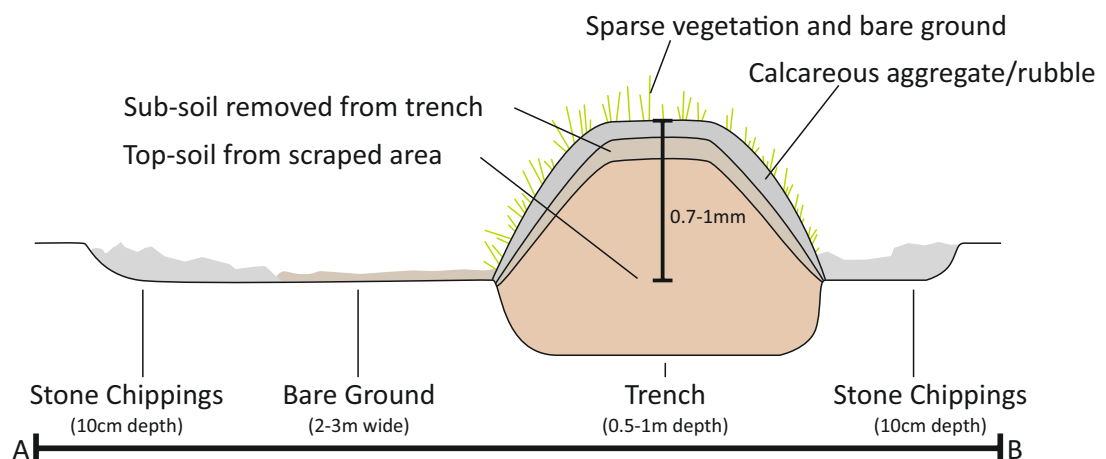
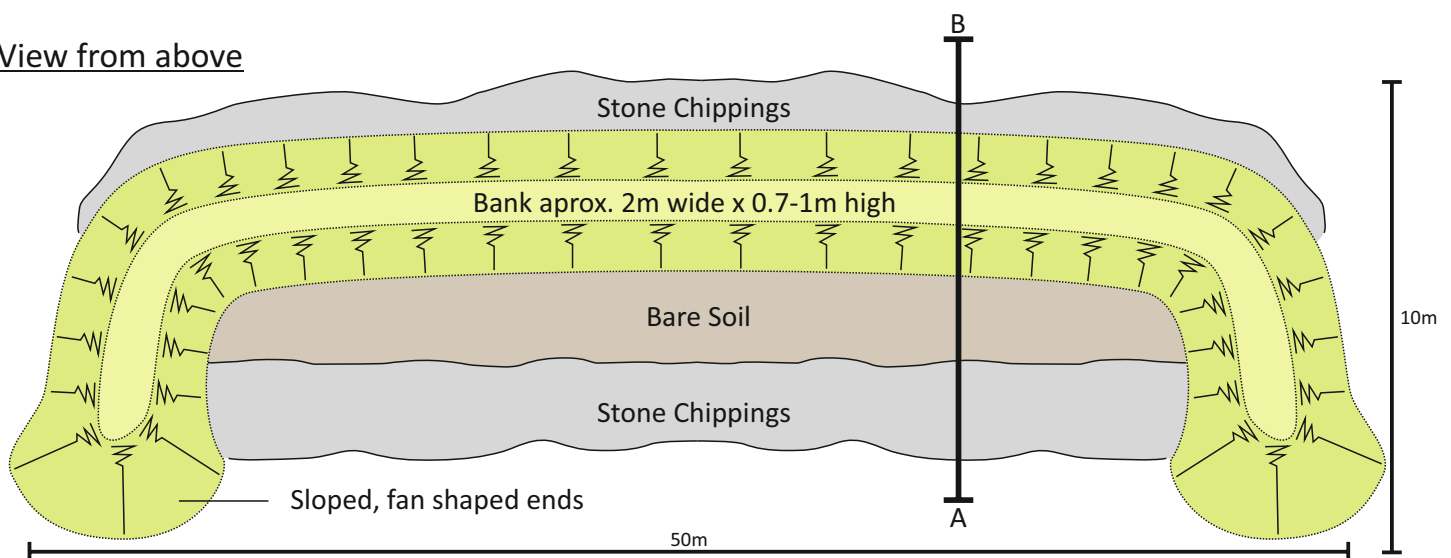
Butterfly Bank

Butterfly banks provide breeding opportunities and enhance connectivity between habitats for a range of butterfly and moth species and other invertebrates.

Butterfly banks are sparsely vegetated mounds, ideally created on nutrient poor substrates, which support a mosaic of early successional herbs and bare ground. The bank can also be designed to reduce nutrients through burying of topsoil as described below.

Butterfly banks should be situated in a sheltered area where an unshaded, south-facing bank can be created, as well as a variety of other aspects (through designing the bank in a 'C' shape) creating different temperate conditions and microclimates.

View from above



Based on recommendations within Butterfly Conservation's Management Factsheet - Creating a butterfly bank.