

Employment Land Road, Biodiversity Gain Plan and HMMP (DISC/26/0220 and S106/26/0033): HDC Ecology Response

NO.	COMMENT	APPLICANT RESPONSE
Metric		
01	As submitted, there are entries within the post-development tabs of the metric for on-site area and hedgerow habitats that are assigned as having a medium strategic significance. As the West Sussex Local Nature Recovery Strategy was published in June 2026, this level of strategic significance can no longer be applied (please see the metric user guide). In accordance with the priorities mapped and identified within the LNRS, only the proposed woodland creation may receive the uplift, and therefore this entry should be amended to high strategic significance and all others as low by default.	The BNG Metric has been amended accordingly, with the strategic significance multiplier updated as requested, to the benefit of the number of habitat units provided. However, we would be grateful for clarification on the basis for requiring this amendment post-consent, given that the original Metric was submitted and accepted as part of the planning application.
Biodiversity Gain Plan		
02	Section 6.4 should be amended to '16.09' area habitat biodiversity units, and Section 6.5 amended to read '2.93' units and '22.28%' net change for area habitats, as per the submitted metric calculation.	We are unclear as to why the amendment sought requests area habitat units to be reduced to 16.09 in Section 6.4. The metric submitted alongside the planning application (V3; now the previous revision) demonstrated 16.82 units. Nonetheless, the Biodiversity Gain Plan submitted with this response has been amended to align with V4 of the metric (as set out at 01 of this response), which now provides 17.18 area habitat units.

		6.5 showing a 3.66 unit (27.83%) gain is similarly accurate to the approved (V3) metric though has also been amended to reflect V4 of the metric submitted. This now provides a 4.03 unit (30.60%) gain.
03	The numbers recorded in Sections 7.4 – 7.6 for watercourse figures need revisiting to align with the submitted metric calculation.	An updated Gain Plan is enclosed with this response. Unit numbers have been updated to match Metric V4.
04	There are no allocations under the habitat bank reference BGS-130225001 for permission DC/25/1543. The allocation is required prior to discharge the deemed biodiversity gain condition.	This has now been allocated and is visible on the Sites Register.
HMMP		
05	Monitoring requirements must include year 20. Monitoring reports need to be in alignment with HDCs process – monitoring reports submitted in years 1,2,5,10,15,20,25 and 30.	This has been added to the amended Habitat Management and Monitoring Plan (11/08/2026; Rev. B) enclosed.
06	Please include a watering frequency for whips to be planted in woodland, hedgerows and as individual trees.	Watering frequencies have been updated and specified in the amended Habitat Management and Monitoring Plan (11/08/2026; Rev. B) enclosed.
07	Tables PM-B01 and PM-T01 – other neutral grassland is also proposed in good condition for SuDS basin. Please can this be added. Please also specify that the hedgerow to be created and existing hedgerow to be enhanced is to become species rich.	Table PM-T01 has been amended accordingly.
08	The height for cutting other neutral grassland is considered high (e.g., 50cm). Please amend GH-T01 to state a cutting height of 100mm/10cm. Please detail an additional cut in early autumn/late winter where required, ground conditions allowing. If needing to sow yellow rattle, 10cm may be too high for successful germination in early Spring. Note the frequency of cuts of every 2 weeks in year 1 (April – October) is considered intensive for establishment. A maximum of three cuts across this period should suffice. Furthermore, cuts are not considered necessary in April and May and are usually done late winter/early Spring (e.g., February or early March, ground conditions allowing), and June/July (with some pushed to August with regards to ground-nesting birds and invertebrate assemblage interest), and later in the year September/October. Note that	Table GH-T02 has been amended to other neutral grass cutting height to 10cm and reduce cutting frequency in accordance with the suggested timings. Table GH-T01 has been amended accordingly.

	scarification may not be necessary in year 3 onwards and may disrupt establishment efforts. This should be a remedial action instead.	
09	Please refer to nesting bird season months throughout so it is clear to management contractors and refer to cautionary approach when pruning/cutting tree limbs.	The Habitat Management and Monitoring Plan (11/08/2026; Rev. B) has been amended accordingly.
10	Please detail the number of standard trees within hedgerow creation/enhancement if possible.	Additional standard trees are not proposed within retained / newly created hedgerows. Existing hedgerows where existing hedgerow with trees are retained, they will be enhanced through whip planting but not additional tree planting along retained hedgerows is proposed. (existing trees along hedgerows c. 15 trees).
11	The method of weeding should be manual/by hand in the first instance and herbicide should be a last resort (see Table HD-T02), unless treating invasive non-native species as listed under Schedule 9 of the Wildlife and Countryside Act 1981 [as amended]. This should be the approach throughout the HMMP.	Table HD-T01 has been amended accordingly. The messaging through the HMMP is consistent that herbicides will only be used where necessary.
12	The proposed tree mix is not going to achieve criterion A for individual trees, as the species mix does not meet the 70% native requirement. The other proposed species are cultivars and are not considered native. It is recommended to increase the abundance of native species to reach 70% (see consultation response comment regarding native tree planting near to the priority woodland habitat, which is still recommended), or to not target condition criterion A.	The proposed tree mix does not target Criterion A condition, and Table UT-T01 has been amended accordingly. Moderate condition can be achieved.
13	Please do not remove deadwood from the watercourse as it provides habitat for many freshwater species and acts as natural water flow regulators. Cutting additional bankside vegetation is likely to impact the watercourse by increasing light – removal of Himalayan balsam will contribute to this. Further bankside vegetation cutting and removal of deadwood were not included within the main planning application, and these actions are also considered off-site. As such, it is recommended to remove these actions from the HMMP.	Table WC-T02 has been amended accordingly.