HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Wilderness Farm Broadwater Lane Copsale Horsham
DESCRIPTION:	Outline Application for redevelopment of the site to provide up to 16 dwellings, ancillary parking and landscaping with all matters reserved
REFERENCE:	DC/26/1676
RECOMMENDATION:	Holding objection / More information

SUMMARY OF COMMENTS & RECOMMENDATION:

The metric currently demonstrates that the development will have a -45.20% net loss (-7.77 units) in area habitats and a +121.46% net gain (+0.33 units) in hedgerows. However, the full extent of post-development habitats has not been inputted as it has not been finalised, and therefore these figures are subject to change.

A holding objection is recommended due to a ditch and irreplaceable habitat (ancient woodland) being unaccounted for in the metric, and the omittance of a botanical species list to support the on-site habitat classifications. These comments must be addressed prior to grant of planning permission.

Other comments relating to post-development including the relationship between the development layout and the ancient woodland and boundary vegetation, accounting for tree losses in the metric, and species composition of proposed habitat enhancements are listed, and these should be addressed at Reserved Matters must be resolved to discharge the deemed biodiversity gain condition. Further HMMP comments are listed for the forthcoming final HMMP to discharge the S106 obligation.

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 -45.20% net loss (-7.77 units) in area habitats and a +121.46% net gain (+0.33 units) in hedgerows. In accordance with HDCs significant on-site criteria, the proposed on-site BNG is considered significant as the gains pertain to habitats of a medium distinctiveness (hedgerows) and therefore a legal agreement to secure the delivery will be required. Monitoring reports will ned 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.

Baseline

1.0 It is understood that a ditch is present on the eastern boundary, which is to play a role in the drainage strategy of the proposal. A ditch has not been accounted for in the metric, neither within the watercourse module or hedgerow module. Further clarification is therefore sought on the ditch.

1.1 As per the Arboricultural Impact Assessment (AIA) and Preliminary Method Statement (MDJ, 2026), and the Natural England Ancient Woodland Inventory Map, it is understood that ancient woodland does fall within the red line boundary. As such, this area of woodland (B8 on the post-development habitat map in the Biodiversity Net Gain Statement (Oz Group Contracting Ltd, 2026) must be assigned as irreplaceable habitat within the metric, as per the minimum national validation requirements.

1.2 A botanical species list of the habitats on-site is requested as per good practice to support the concluding habitat types recorded.

Post-development

2.0 The current illustrative site layout indicates that dwellings will immediately abut retained boundary woodland habitat (which contains an area of ancient woodland). To protect these habitats from deterioration and ensure certainty of retention in their current condition, a buffer should be incorporated comprising shrubby species. This will require an amendment to the layout to account for this.

2.1 Appendix 3 in the AIA appears to cut off the northern-most section of the site. It is therefore requested that a fully visible document is provided to ensure that Plot 11 falls outside of the proposed 15m ancient woodland buffer.

2.2 More hedgerow species (specifically comprising a minimum total of 5x woody species as listed within the Hedgerow Regulations 1997 within a 30m stretch) are required to be incorporated into the proposed hedgerows to meet the proposed species-rich native hedgerow classification in the metric, as per UKHab.

2.3 It is not understood how the parcel B10 (see post-development habitat map in the BNG Statement) can be retained when overlapped with private gardens and buildings. Please can this be clarified.

2.4 The 15m ancient woodland buffer should incorporate native species (incl. spiky species) as found within the adjacent ancient woodland, as far as possible. This is to deter residents accessing the woodland and subsequently resulting in its deterioration. It is acknowledged that Plot 16 falls within the ancient woodland buffer to the west, and therefore it is advised to seek HDC Arboricultural Officer comment on whether this is acceptable, however it is encouraged to modify the layout to respect the full 15m buffer.

2.5 It is noted that 3x trees are proposed to be lost in the south of the site. However, these losses do not appear to be accounted for in the metric. Please can this be amended. Please also note that any removal of Category U trees will also need to be accounted for if within the red line boundary.

2.6 It is understood that not all habitat enhancements proposed within the communal areas of the site have been included in the metric as it is subject to change.

Strategic Significance

3.0 It is understood that the entirety of the site falls within the West Sussex LNRS priority Cor2.2 (create new wildlife corridors). However, as per the metric user guide, as this priority is not a habitat specific priority, it cannot be used when assigning strategic significance uplift to a habitat measure for BNG purposes. Another priority, W1.12 (manage existing and 'future' veteran and ancient trees), is also located on-site with reference to the Monterey Pine (T15 in the AIA). However, no enhancement is suggested for this tree, and it is not understood how it would be feasible to enhance, and therefore this is also low by default in the baseline. As recognised by Oz Group Contracting Ltd, any change in the units with regards to strategic significant uplift is minimal.

Draft HMMP

4.0 Please note that a full and final HMMP will be required to discharge the S106 obligation. It is recommended to consult Natural England's HMMP template, companion document, and checklist, for expected content. Management prescriptions, monitoring methodology, risk register and remedial measures, and roles and responsibilities will require further detail, and the specific target condition criterions for each habitat type will be expected. The post-development habitat map should also be included, which specifies the UKHab habitat parcels.

4.1 Please note that herbicide use for weed control is strongly discouraged and should only be used as a last resort, unless eradicating invasive non-native species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

4.2 If proposing individual tree planting, please note that in the event of failure, these must be replaced on a 1:1 basis in the following planting season rather than the trigger of a percentage of the total number of trees lost. This is because the trees count individually towards the metric calculation, unlike for example woodland which is an overall hectarage cover.

4.3 It is advised to also refer to taking precaution with regards to roosting bats during management operations.

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:	25/11/2026