



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land To The Rear of The Copse Worthing Road Horsham West Sussex
DESCRIPTION:	Construction of up to 23 residential dwellings, (including 9 affordable homes), including access, parking, landscaping and other associated infrastructure works.
REFERENCE:	DC/26/0355
RECOMMENDATION:	Modification / More information
SUMMARY OF COMMENTS & RECOMMENDATION: The biodiversity metric demonstrates that the development will have an overall -46.04% net loss (-5.31 units) in area habitat and a 20.31% net gain (+0.27 units) in watercourses. However, further amendments are required pertaining to the baseline and the post-development tabs within the metric. Further modifications are requested relating to the layout of the development, in particular respecting the 5m riparian zone of the ditch network and redesigning the footpath to avoid the need for a bridge over the ditch and removal of priority woodland habitat. Brief comments are provided on the draft HMMP.	
MAIN COMMENTS: The comments below relate solely to the BNG proposed in the above application. The comments are not considered exhaustive. All other ecology matters will be reviewed by Place Services and NatureSpace, where appropriate. As currently submitted, the biodiversity metric demonstrates that the development will have an overall -46.04% net loss (-5.31 units) in area habitat and a 20.31% net gain (+0.27 units) in watercourses. There will also be a net gain in hedgerow units, however as none are present at baseline, there will be no percentage increase. As per HDC's definition, the proposal is considered significant on-site BNG due to the net gain in watercourse module relating to enhancement of medium distinctiveness habitats, and therefore, if minded to approve, a S106 legal agreement is required to secure the BNG and monitoring reports will need to be submitted to HDC typically in years 1,2,5,10,15,20,25 and 30. Please note that the concerns detailed below may change the final BNG figures calculated by the metric. <u>Baseline</u> 1.0 The legislation does not provide for a future baseline, and therefore the baseline must be taken to be the habitat which is on site on the relevant date (i.e., date of planning application submission or if habitat degradation occurs, the date prior to this	

degradation). Currently, developed sealed surface has been entered in the metric as provided as part of planning permission DC/24/0622. Please can this be amended to reflect the current habitats on site for where the applications overlap.

1.1 For ease, it is also recommended to restrict the red line boundary within the Phase 1 area to the access route only (which will be the proposed hardstanding as above), given the overlap in red line boundaries between this proposed development and DC/24/0622. Please see more on this point below.

Post-development

2.0 Section 3.8 of the Planning Statement (SLR, 2026) states that the proposal includes creation of 69 trees. However, 20x trees are proposed within the metric. This appears to include new trees to be planted within the adjacent Phase 1 site (see Drawing No. 02 - BNG Proposed Plan within the BNG Statement, Lizard 2026 ref. LLD3554-ECO-REP-002-00-BNG), which currently overlaps with and differs to the BNG proposed to be delivered here as part of the application for Phase 1 (DC/24/0622). Note that the habitats to be created and enhanced must be the same within the overlapping land, and therefore which ever biodiversity gain plan comes in later should accord with the previously approved biodiversity gain plan for the other site. Any changes made after any approvals will require an application to vary the BGP and any other associated documents e.g., HMMP and S106, where relevant.

2.1 According to the Proposed Site Layout (Fluid Architects, 2026), multiple trees (and introduced shrub) are proposed within communal areas in the main residential area, and these should be included within the metric. Confirmation is sought on the correct tree planting number with the above point 1.1 and 2.1 in mind.

2.2 A 0.03km length of native hedgerow with trees is proposed, and whilst acknowledged in Section 3.6.1 of the BNG assessment that this is not required to meet any 10% in the hedgerow module, it should still be entered within the metric to count towards the post-development value as per Para 2 of Schedule 7A of TCPA (it will still provide unit increase, but there will be no percentage gain).

2.3 Please can the encroachment over the ditch crossing the main site area resulting from the proposed pedestrian bridge please be accounted for. Alternatively, can this footpath go around the SUDS to prevent 2x crossings over ditch?

2.4 It is noted that a footpath is proposed into the retained woodland, which does not appear to connect to a recognised PROW. Please can this be removed to prevent further loss of the priority habitat woodland.

2.5 The current watercourse easement is approx. 3m in many places. It is preferred that any residential dwellings and curtilages are located outside the riparian zone of the ditches on-site (5m), and access for maintenance is retained.

2.6 It is noted that the RPAs of many trees to be retained are within proposed private gardens. As such, it is advised to consult the HDC Arboricultural Officer to comment on the certainty of retention of these trees, and recommended conditions where appropriate to ensure their retention.

HMMP

3.0 Please include culvert creation for clarity – no management prescriptions required.

3.1 Please include hedgerow creation – see point 2.2 above regarding hedgerow inclusion.

3.2 The information relating to the targeted condition criteria within the BNG assessment are satisfactory to assure HDC that the proposed habitats and their conditions are attainable. A full HMMP will be required as an obligation within the S106. Note that due to the proposal of a priority habitat, this will need further consideration as to how the description within the JNCC documents will be met. Please do also ensure that the monitoring efforts match the report deadlines to HDC as specified above.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative –

Scenario 1: BNG Required

Recommended additional wording to informative:

It is noted that another permission (DC/24/0622) covers land partially within the red line boundary of this permission. As part of the other permission, habitat enhancements are proposed within this overlapping land area to achieve its biodiversity net gain requirement. As such, both permissions shall need to accord and align with each other, to ensure consistency and deliverability of the habitat enhancements to fulfil the biodiversity net gain requirements for both permissions. Any Biodiversity Gain Plan submitted to discharge the deemed biodiversity net gain condition shall not be approved in the case that the proposals and/or layout undermines the already approved biodiversity gain plan of the other permission.

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	16/04/2026