



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Thakeham Tiles Ltd Rock Road Storrington West Sussex
DESCRIPTION:	Outline application for the demolition of existing buildings, and the re-development of the site for up to 108no. dwellings (including a mix of private and affordable housing units), with associated infrastructure including vehicular, cycle and pedestrian access, parking, landscaping, open space and play provision, and sustainable drainage with all matters reserved except access.
REFERENCE:	DC/25/2087
RECOMMENDATION:	More information / Modification No objection
SUMMARY OF COMMENTS & RECOMMENDATION: Most of the comments have been addressed, which is welcome. The loss of woodland cover remains regrettable. Outstanding comments relating to the post-development habitats will need to be addressed at Reserved Matters (although see point 4 regarding relationships between site layout and southern woodland RPAs), and strategic significance amended considering the recently published West Sussex LNRS when submitting the Biodiversity Gain Plan to discharge the deemed biodiversity gain condition. A final HMMP will be required as an obligation within the legal agreement, and to support the Biodiversity Gain Plan. Currently, the metric calculation demonstrates that the development will have a 11.30% net gain (+2.96 units) in area habitats, +0.80 units in hedgerows, and a -31.03% net loss (-0.09 units) in watercourses. However, further information and amendments are requested relating to the baseline assessment and post-development plans which may change these figures. The strategic significance of the woodland habitat is lower than what is advised in HDC BNG guidance, and a few minor points are raised relating to the draft HMMP.	
MAIN COMMENTS: The comments in this response relate solely to the BNG proposal as part of the above application. Note that the concerns highlighted below are not exhaustive. All other ecology matters will be reviewed by Place Services and NatureSpace, where appropriate.	

As it stands, the metric calculation demonstrates that the development will have a ~~14.47%~~ **11.30%** net gain (+3.57 **+2.96** units) in area habitats, +0.19 **+0.80** units in hedgerows (no percentage can be calculated as no hedgerows were identified at baseline), and a ~~50.58%~~ **-31.03%** net **loss** (+0.17 **-0.09** units) in watercourses. As the overall net gain is greater than 0.5 units, as per HDC's definition this is considered significant on-site BNG, and if minded to approve, will require a S106 legal agreement to secure. Monitoring reports will be expected to be submitted to HDC typically in years 1,2,5,10,15,20,25 and 30. However note, with the amendments requested below, the final figures for BNG calculations are likely to change.

Despite **a net gain in the area habitat** module of the metric, the trading rules have not been met due to the high loss of individual trees. As such, and as acknowledged in the BNG report, additional units will need to be purchased to satisfy the trading rules, **as well as to meet a 10% net gain in the watercourse module.**

It is disappointing that this outline application extends into the priority woodland habitat to the north-east of the site, unlike the previously consented outline application DC/18/2095. As per Para 192(b) of the NPPF 2025, plans should '*promote the conservation, restoration and enhancement of priority habitats, ecological networks [...] and identify and pursue opportunities for securing measurable net gains for biodiversity*'. Whilst the latter has been demonstrated, the overall loss of priority woodland cover across the site (which is proposed as higher than the previously consented outline application) is a material consideration and it is at the Case Officers discretion as to whether the benefits of the development outweigh this adverse impact.

Baseline

- 1.0 As previously highlighted in the preapplication response and confirmed in the EcIA report (The Ecology Co-op, 2025, see Figure 9 for mapping), the northern east and west woodland parcels and the broadleaved woodland in the centre/south of the site are identified as priority woodland habitat (as can be seen on Defra's MAGIC map). Therefore, justification is required as to why these have not been inputted as such (i.e., as lowland mixed deciduous woodland) in the metric. This is particularly important given the proposed loss of this woodland to facilitate the development.

The updated BNG Assessment states that the understorey of the woodland is dominated by non-native species, and there was a lack of varying tree structure and species diversity within the woodland parcel. For these reasons, the classification of the woodland has been downgraded from priority habitat status. Such evidence should be submitted to Natural England to remove the designation of priority habitat. It should be noted that given the current condition of the woodland, it is considered likely that the woodland can bounce back to priority habitat status with good management, and generally the presence of non-native species does not eradicate the status entirely. As such, it is requested that enhancements to this habitat are classified in the post-development tabs of the metric to reach lowland mixed deciduous woodland (priority habitat), in accordance with priority W1.8 of the now published West Sussex Local Nature Recovery Strategy and to qualify for strategic significance uplift. Such amendments can be deferred to Reserved Matters. Nonetheless, as highlighted above it is regrettable that woodland cover is to be lost to this development.

- 2.0 It is noted in the Proposed Drainage Strategy Plan (Stantec, 2025) that a ditch (partial culvert) running along the north of the site appears to be within the red line boundary, with installation of a headwall proposed from the attenuation basin run-off. Please can further confirmation be sought as to why this ditch has not

been accounted for in the metric. Any ditches within 5m of the red line boundary are also caught within BNG assessments of a site.

Additional wording has been provided in the BNG Assessment stating that several ditches on-site were found to be dry year-round, or don't meet the full criteria to be counted as ditches for BNG purposes. Concern resolved, with thanks.

Post-development

- 3.0 It is noted that 0.24ha of the north-eastern woodland parcel is recorded as lost in the metric (with the remaining 0.527ha to be enhanced), however there is no details within the BNG Assessment (Ecosupport, 2025) as to the reasoning for this. It is understood that visibility splays are likely to be needed, however 0.24ha for this is considered excessive. Please can further clarification be provided.

Does not appear to be addressed.

- 4.0 There is a lack of tree RPA information relating to the woodlands surrounding the development footprint, particularly in the south of the site (see Tree Retention, Removal and Indicative Tree Protection Plan, CBA Trees 2025 drawing no. CBA10637.02 TRR&TPP). The level of impact cannot therefore be fully ascertained, and subsequently nor can certainty of tree retention in cases where RPAs are subject to private garden incursion. It is requested that this information is sought, and the HDC Arboricultural Officer is consulted.

Awaiting HDC Arboricultural Officer confirmation.

- 5.0 54x trees are proposed in the HMMP, however 80 are stated in the BNG Assessment and metric. It is also noted that there appear to be tree number and location discrepancies between the post-development map in the BNG Assessment and the Illustrative Landscape Masterplan (Lizard, 2025 drawing no. LLD3475-LAN-DWG-010). Therefore, please can the correct number of proposed trees be confirmed.

This has now been amended to 74x trees. With thanks.

- 6.0 It is recommended that modified grassland around the LEAP area is targeted to meet a poor condition due to the likely high recreational disturbance it will receive.

Concern resolved, with thanks.

- 7.0 Any proposed access to the retained priority woodland habitats is not supported, and proposed enhancements will need to be revisited to account for additional deterioration resulting from trampling. It is advised to install fencing or planting spiky species along the woodland edge to act as deterrents.

- 8.0 The installation of a headwall on the existing ditch near the centre of the site (from the proposed cellular tank) has not been considered with regards to increased encroachment. Please can this be amended in the metric (rules on how to do this are within the metric user guide).

Concern resolved, with thanks.

- 9.0 The introduction of dwellings will result in broken or thin connectivity in small areas to the central west of the site. Further efforts are advised to better connect the woodland periphery to allow protected and priority species to traverse successfully across the site. Note that these green corridors must not be illuminated, which has the same impact as physical fragmentation of habitat. This is important considering that this habitat connects to the wider habitat and acts as a stepping stone habitat to the Sullington Warren SSSI.

Further tree planting has been proposed to fill the gaps and connect green corridors across the site. This is welcome. Concern resolved, with thanks.

- 10.0 T24 is listed within Table 7 of the BNG Assessment report and is identified as retained, however this tree is advised for removal in the Arboricultural Impact Assessment (CBA Trees, 2025).
Does not appear to be addressed.
- 11.0 Tree 12 is mapped as individual trees on the baseline habitat map in the BNG Assessment report, however there is no mention of this tree in Table 7 of the report. Please can further confirmation be sought on whether this tree has been considered.
Does not appear to be addressed.

Strategic Significance

- 12.0 The southern half of the site lies within the Lower Adur and Arun Watershed Biodiversity Opportunity Area. As woodland is indicated as a key habitat within this BOA, and as per HDC's interim guidance on strategic significance, we expect all woodland in this area to be classed as a high strategic significance at both baseline and post-development.
- 13.0 It should be noted that the West Sussex LNRS is currently due for publication in Spring 2026. The strategic significance as a result of the LNRS is mandated as of publication, which applies to an application at any stage in the planning process. Therefore, if the Biodiversity Gain Plan to discharge the deemed condition is submitted post-LNRS publication, the LNRS mapping and priorities may need to be consulted to determine if the strategic significance needs amending. The draft LNRS currently highlights that all broadleaved/mixed woodland on-site is covered by the woodland enhancement priority, and therefore at present the BNG proposal is in accordance with the LNRS priorities. If this remains post-publication, the strategic significance will need to be assigned as high in the post-development tabs.

Please note, the West Sussex Local Nature Recovery Strategy has now been published, and the woodlands on-site are highlighted as priorities. As such, this will require further amendments, with all baseline habitats automatically assigned a low strategic significance, and removal of the medium strategic significance category (please see the metric user guide for more information). Please also see comments relating to point 1.0 above. This change is expected to discharge the deemed biodiversity gain condition.

HMMP

- 14.0 No ditches aren't present within the HMMP – please can these be added with the proposed target condition criteria and management methods to achieve these.
Ditches have now been added, but with no reference to target condition criteria. Such information will be expected in the final HMMP. For expected content, please refer to Natural England's HMMP template, companion document and checklist.
- 15.0 Biocides should only be used as a last resort, unless eradicating species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Please can words to this effect be added under each habitat for the control of undesirable species, with manual removal being the preferred primary method.
Concern resolved, with thanks.
- 16.0 Details of watering frequency for planted trees and shrubs are requested to be included in the HMMP.
Has since been added. Please apply to all other relevant habitats and add to schedule in final HMMP.

17.0 A final HMMP will be required alongside the Biodiversity Gain Plan to discharge the deemed biodiversity gain condition ([as well as an obligation within the legal agreement](#)).

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative

Scenario 1 – BNG required

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	03/02/2026 07/07/2026