

12 June 2026

FAO: Kate Turner
Senior Planning Officer
Horsham District Council

By email only

SLR Project No.: 433.066607.00001

**RE: The Copse Phase 2 – Application Reference DC/26/0355
Response to Consultee Comments**

Construction of up to 23 residential dwellings, (including 9 affordable homes), including access, parking, landscaping, and other associated infrastructure works.

On behalf of our client, Starbuild Ltd., we would like to respond to the following consultation responses received to date.

1. Land Contamination

- *Request for an up-to-date walkover of the site subject to this Ph2 application to be undertaken and a revised report issued just relating to the Ph2 site.*

SLR Response:

An updated site walkover has been completed as requested and confirmation is submitted along with this letter.

Reports submitted:

- GeoEnviro Letter
- 4444-23 PII GI Interpretative Report

2. Place Services - Bats

Comments made by Place Services

- *We are not satisfied that there is sufficient ecological information available for determination of this application and recommend that details of survey results, mitigation and enhancement measures for bats are provided prior to determination.*
- *The reasons for this are outlined below:*
- **European Protected Species** - *We note from Section 3.4.10 of the Ecological Impact Assessment Revision 01 (Lizard Landscape Design and Ecology, December 2025), MAGIC maps and the map on the planning portal that an existing building lies in the path of the access route, within the red line boundary at the site entrance. It appears that this building will need to be demolished, but it has not been subject to a Preliminary Roost Assessment.*
- *Therefore, we recommend that a Preliminary Roost Assessment for bats is undertaken in accordance with 4th Ed. Bat Surveys for Professional Ecologists Bat Conservation Trust (Collins*

ed., 2023). This is required prior to determination in order to inform any mitigation requirements or the need for further surveys. This type of assessment can be undertaken at any time of the year by a qualified ecologist.

We understand from Section 4.4.2 of the Ecological Impact Assessment Revision 01 (Lizard Landscape Design and Ecology, December 2025) that tree T83 has Potential Roost Features for multiple bats (PRF-M). We therefore request confirmation that this tree will be retained within the development when the plans have been finalised.

SLR Response:

The existing dwelling was approved for demolition under reference DS/25/0618 dated 14 November 2025. The dwelling and subsequent permission were subject to bat licence reference WML-CL47, therefore the comments relating to the existing building and bat roosts are no longer relevant.

Reports submitted:

- Bat ER Class Licence WML-CL47 V2.5
- 20093Demolition Approved Letter_14-20251114-160957

3. Drainage*Comments made by HDC Specialists Team - Strategic Planning*

- *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?*

Price and Myers Response:

With regards to the pedestrian crossing, the LLFA did not raise any concerns about the proposals for two crossings over the ditch.

- *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.*

Price and Myers Response:

The council's guidelines on ordinary watercourse land drainage consents state that "under the Flood and Water Management Act 2010, West Sussex County Council, as the Lead Local Flood Authority (LLFA), is the consenting authority for proposed structures and obstructions within a watercourse; these require consent under Section 23 of the Land Drainage Act 1991." We have contacted the LLFA to discuss the proposals, and they confirmed that a 3m easement is required for this watercourse (refer to point 10 in the response received from the LLFA – copy submitted) and extracted below:

'The watercourses within the site and boundaries will need a 3m easement from the top of both banks for maintenance purposes. The applicant is reminded that the landowner (riparian owner) must maintain all watercourses now and as the development progresses, to ensure flood risk is not increased elsewhere.'

While a 5m stand-off is expressed as a preference, the scheme provides this where practicable, with a minimum 3m easement maintained in all locations in accordance with the agreement with the LLFA. This ensures maintenance access and protection of the watercourse are not compromised, and represents a reasonable and proportionate response to the site's constraints.



With regards to landscaping comments Price and Myers have confirmed that they have updated the FRA in accordance with the comments made. Specifically, the revised landscaping drawing was used as the base drawing for the drainage layout. The attenuation tank was reshaped to avoid clashes with trees, and the rising main was rerouted to minimise impacts on trees. In addition, footbridge detail was provided, and the reference to "weed spray with environmentally friendly chemicals" was removed from Table 6.1.

Document submitted:

- WSCC 719750830 The Copse Worthing Rd L2 pre app response
- 31276-2 PM Land West of Worthing Road_FRA – 4
- 31276-SK6066-4 Drainage Plan

4. Trees

Comments made by Tree Officer

- Clarification/confirmation that the road will not be built to an adoptable highway standard;
- Provide confirmation that the extent of new no-dig hard standing proposed does not exceed 20% of the currently unsurfaced minimum recommended root protection area of either of the two TPO oak trees affected;
- Provide confirmation of where all the relevant utility installations will be routed – water, gas, electric etc. through this pinch point. If only a single trench is required, provide detail of services layout within it.

Comments made by HDC Specialists Team - Strategic Planning

- concern remains with the northern, eastern and southern boundaries, highlighting plots 5, 11, 12 and 23 in particular, where the existing trees will be at risk of post development pressure. 11 and 23 are of key concern given that the private gardens fall almost entirely within the root protection area (RPA) of existing trees, particularly plot 23 and the RPA of P2T92 which is afforded protection under TPO/1543.

Response:

Please see submitted response prepared by Ruskins Tree Consultancy.

Report submitted:

- Arboricultural Statement in response to Tree Officer comments for The Land to the West of The Copse RH13 9AT 29-05-2026
- 31276-SK6069 - Section Drawing

5. Landscape

Comments made by HDC Specialists Team - Strategic Planning

Please see submitted response from Lizard Landscape.

With regards to the request to remove the footpath into the retained woodland; this was requested at pre-app stage by Horsham Planning to ensure a future link to the Strategic Allocated site proposed to the west and north of the site.



Reports/plans submitted:

- LLD3554-LAN-LET-001 Landscape Response
- LLD3554-LPL-REP-001-02 LVA 2
- LLD3554-LAN-DWG-010-03 Landscape Masterplan
- LLD3554-LAN-REP-010-02 Landscape Design Strategy 1

6. Ecology

- *Comments made by Ecologist and Naturespace – EDNA surveys*

Response:

Please see submitted updated information from Lizard Ecology.

Reports/plans submitted:

- LLD3554-ECO-REP-003-01-HMMP DRAFT
- LLD3554-ECO-REP-002-02-BNG
- LLD3554-ECO-REP-001-02-EcIA
- LLD3554-ECO-CALC-001-02-METRIC

7. Affordable Housing

After discussions with Horsham District Homes who have stated that they would only be interested taking on the larger properties i.e. 3-bed and 4-bed as affordable homes, the layout and schedule have been amended to show 1No. 1-bed FOG dwelling, 6No. 3-bed and 2No. 4-bed affordable homes; a total of nine properties. This means that the site is still policy compliant at 39%.

These nine properties will be broken down as follows:

<u>Affordable rent</u>	<u>Intermediate rent</u>
3x3b	3x3b
2x4b	
1x1b	

Report submitted:

- FL25-2301-010J - Accommodation Schedule

8. Sustainability*Comments made by Environmental Health and Licensing*

- *An Assessment of Dust from Demolition and Construction (using the methodology in the IAQM's Guidance on the assessment of dust from demolition and construction) to be submitted up front;*

Response from RF Environmental:

The relevant construction information to inform the assessment is not available at this stage, so we request that this is conditioned.

- *A review of the EFT and damage cost calculations as believed to be inaccurate;*

Response from RF Environmental:

The damage cost has been recalculated and is £1 less than previously reported, i.e. £1,656 rather than £1,657. However, Defra has since updated the EFT and damage cost toolkits. Confirmation is requested from the EHO as to whether the calculations need to be updated using the latest Defra toolkits.

- *A revision of the mitigation measures as cycle storage is not considered acceptable.*

Response from RF Environmental:

A contribution towards measures identified within the Storrington AQAP is proposed. Given the distance to the Storrington AQMA, a contribution to either the AQAP or the wider Horsham District may also be appropriate. This would ultimately be at the discretion of the LPA. Potential measures for consideration, by way of contribution, could include:

- Contribute to local low or zero emission vehicle refuelling/recharging infrastructure;
- Contribute to low emission bus service provision or waste collection services;
- Contribute to local bike/e-bike hire schemes;
- Contribute to renewable fuel and energy generation projects;
- Fund incentives for the take-up of low emission technologies and fuels.

- *Provide evidence that key sources of air pollution have been identified within the scheme and taken appropriate action to minimise emissions of PM2.5 and its precursors as far as is reasonably practicable;*

Response from RF Environmental:

An assessment of introduced road traffic and energy plant associated with the development has been undertaken, with both expected to have a negligible impact in accordance with IAQM guidance. In addition, the demolition and construction assessment will be carried out and appropriate mitigation recommended in line with IAQM guidance, as per the LPAs above request. We would be grateful if the LPA could clarify what further evidence they require in relation to this point, if required.

We look forward to receiving confirmation that our responses above, along with the submitted plans and reports, address the concerns raised to date and that no further information is required. Should you have any questions or wish to discuss any submitted report or plan, please do not hesitate to contact us.

Regards,

SLR Consulting Limited

Debra Higginbotham

Associate Planner - Planning

