



Horsham  
District  
Council

## HORSHAM DISTRICT COUNCIL CONSULTATION

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| <b>TO:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Horsham District Council – Planning Dept                                                                                                                    |
| <b>LOCATION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Land at 519396 111237 Church Farm Walk Upper Beeding West Sussex                                                                                            |
| <b>DESCRIPTION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Erection of 4 No. detached dwellings with associated amenity space, car parking spaces, detached carports, access road and other associated infrastructure. |
| <b>REFERENCE:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | DC/25/2114                                                                                                                                                  |
| <b>RECOMMENDATION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <a href="#">No objection</a><br><a href="#">More information / Modification</a>                                                                             |
| <b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b><br><a href="#">Further amendments are requested prior to discharging the deemed biodiversity gain condition and S106 obligations.</a><br><br><a href="#">See below.</a><br>The metric submitted demonstrates that the development will have an overall <a href="#">77.67%</a> net gain ( <a href="#">+1.58</a> units) in area habitats and <a href="#">+0.68</a> units in hedgerows through both on-site and off-site habitat enhancements. Prior to grant of planning permission, it is requested that clarification is sought on the comments regarding the baseline assessment, and it is advised that the consistency between reports relating to enhancements within the off-site blue line area is rectified. All other comments must be addressed to discharge the deemed biodiversity gain condition.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                             |
| <b>MAIN COMMENTS:</b><br>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 appropriate.<br><br>The BNG proposed comprises on-site and bespoke off-site enhancements. The metric calculation tool demonstrates that the development will have an overall <del>115.58%</del> <del>52.67%</del> <a href="#">77.67%</a> net gain ( <del>+2.27</del> <del>+1.07</del> <a href="#">+1.58</a> units) in area habitats and <del>+0.86</del> <a href="#">+0.68</a> units in hedgerows. The on-site enhancements alone result in a <del>-40.97%</del> <del>-40.02%</del> <del>-42.28%</del> net loss ( <del>-0.80</del> <del>-0.82</del> <del>-0.86</del> units), and therefore the net gain results from the off-site proposal. As on-site is not contributing towards the net gain, <b>this cannot be considered as significant on-site BNG and therefore a legal agreement to secure on-site proposals is not required.</b> However, all off-site BNG must be registered on Natural England's Biodiversity Gain Register, and a legal agreement and HMMP are required for registration. The applicant will need to notify HDC if they wish to |                                                                                                                                                             |

pursue a legal agreement to secure off-site BNG with HDC, and if they intend to sell any excess units. In the case that they do, further assessment of the off-site areas will be necessary. Any legal agreement to secure BNG with HDC will require submission of monitoring reports, typically in years 1,2,5,10,15,20,25, and 30, and upfront payment of monitoring fees.

The applicant has confirmed their intention to secure the off-site BNG with HDC, with all units solely intended for the biodiversity uplift for the development.

Please note that registration of the off-site BNG incurs a fee, and therefore it may be in the applicant's interest to explore whether the proposed off-site habitats can be absorbed into a larger red line boundary. This would also be in better accordance with the Biodiversity Gain Hierarchy. This would not negate the need for a legal agreement and management and monitoring for 30 years, as this would result in the proposal being significant *on-site* BNG. However, this option would require less admin and registration fees. This decision must be made prior to grant of planning permission to enable HDC to draft the on-site legal agreement. In this case, the HMMP would become an obligation within the legal agreement, rather than a condition.

#### Baseline

1.0 Google Earth and the site visit photographs from 2025 (see the Ecological Impact Assessment, The Ecology Co-op 2025) confirm that the site undergoes periodic bramble scrub clearance. However, Figure 6 of the EcIA maps trees separately to the bramble scrub parcel which is not apparent within the Biodiversity Impact Calculation (The Ecology Co-op, 2025), and therefore further clarification is requested with regards to individual trees on-site.

Does not appear to be addressed.

This has now been added. Concern resolved, with thanks.

1.1 It is understood that the indicative drainage strategy details installation of pipework and an outfall at the nearby watercourse within the blue line boundary. As per Paragraph 024 of the PPG, the red line boundary should include all land necessary to carry out the proposed development. As such, it is at the case officer's discretion whether the drainage should be incorporated into the red line boundary. If the red line boundary is located 5m from the top of the bank of ditches and 10m from the top of the bank of other streams and rivers, this crosses the riparian zone and thus triggers the watercourse module of the metric, and a 10% net gain will need to be achieved for watercourse habitat. Note that for other streams and rivers, a river condition assessment will be necessary to inform the watercourse BNG assessment. As BNG is finalised via the deemed pre-commencement condition, any changes to the red line boundary prior to the submission of the biodiversity gain plan must be reflected in the final metric calculations. It should also be noted that the floodplain grazing marsh and watercourse are highlighted under the priorities of the draft West Sussex Local Nature Recovery Strategy.

The red line boundary has since been redrawn to include the area required to implement the drainage strategy. However, the argument made states that as the ditch is dry it does not need to be entered within the watercourse module. Given the photograph provided in the outline drainage strategy, this is accepted.

The baseline for the pipe route has also been recorded as modified grassland. However, the Natural England's Priority Habitat inventory maps this area as coastal and floodplain grazing marsh. No evidence has been submitted to support modified grassland classification.

Further information has been provided to evidence that this is modified grassland, which is accepted. Please note that an argument is made stating that floodplain grazing marsh cannot be entered in the metric, however it is an option in the metric but rather

abbreviated to 'CFGM'. But as previous, not necessary in this instance. Concern resolved, with thanks.

#### Post-development

2.0 The site falls within the River Adur Water Meadows and Wyckham Wood Local Wildlife Site. The proposed habitats are not representative of the habitats that are cause of the LWS designation, however given the baseline largely comprised of scrub, and the site is bordered by priority habitat woodland, the planting of woodland to extend this parcel and inclusion of mixed scrub to retain the ecological function is considered acceptable. The woodland is also highlighted within the draft West Sussex Local Nature Recovery Strategy as a priority for enhancement.

Woodland planting is now proposed within the off-site area. However, the metric and HMMP management prescriptions do not reflect this. This needs to be updated prior to discharging the deemed biodiversity gain condition and obligation within the S106 for off-site. It is also noted that the baseline (see Figure 1 in the Biodiversity Impact Calculation report / Figure 2 in the HMMP) for off-site includes a small section of woodland, that is not accounted for in the metric, and the habitat creation should not double count woodland planting in this area. Please can this be rectified.

This appears to have been addressed, however there appear to be discrepancies between pre- and post- blue line boundary areas in the maps within the Biodiversity Impact Calculation report. It is suggested that all metric entries and corresponding maps are revisited and finalised prior to discharge of the deemed biodiversity gain condition and S106 obligations.

2.1 It is requested that the hedgerows bordering the priority woodland habitat off-site is comprised of spiky species to act as a deterrent and discourage public access.

Concern resolved, with thanks.

2.2 The Landscape Proposals (CSA Environmental, 2024, drawing no. CSA/5627/104) do not appear to be consistent with the Site Layout (Paul Hewett 2025, drawing no. 2517/PL.03) or Figure 3 in the Biodiversity Impact Calculation report. Specifically, it appears to be missing the hedgerow running along the western boundary of the site.

Concern resolved, with thanks.

2.3 The blue line boundary for the off-site proposals is not consistent within the Biodiversity Impact Calculation and the draft Habitat Management and Monitoring Plan (The Ecology Co-op, 2026) (or habitats within the landscape proposal). The BNG strategy also appears to differ within the two documents. Please can the correct strategy be confirmed.

The correct strategy has since been confirmed. Please note that Figures 1 and 2 within the HMMP may result in confusion for management contractors, and it is therefore recommended to redraw the red line boundary and blue line boundary to match that of the areas within Figure 3.

#### Strategic significance

It is noted that some entries within the metric have been assigned as having a high strategic significance. The West Sussex Local Nature Recovery Strategy was published in June 2026, and therefore the assigned strategic significance must accord with the priorities within this strategy. Specifically, as the habitat delivery is proposed in areas not highlighted within the LNRS (with the only overlapping area being the installation of a drainage pipe and headwall in the area highlighted for enhanced floodplain grazing

marsh), all habitat entries should be assigned as having low strategic significance by default. Please amend this prior to discharging the deemed biodiversity gain condition.  
Concern resolved, with thanks.

#### HMMP

3.0 A draft HMMP has been provided in accordance with HDCs local validation list. A final HMMP will be required either by condition or as an obligation within the legal agreement. The following comments should be addressed to discharge the HMMP condition/obligation. Please note that further amendments to the HMMP may be required dependent on which BNG strategy is being proposed (see point 2.3 above).

3.1 There are multiple incorrect statements in Section 1.1, please can these be amended to reflect the BNG strategy for this scheme.

The HMMP requires updating to reflect the BNG strategy as per Figure 3.

3.2 Please provide a management prescription schedule in tabular format within the appendices.

Does not appear to be addressed.

3.3 Please detail how the individual trees will be managed differently to the mixed scrub to ensure they are not accidentally subject to mismanagement. This may also apply to where mixed scrub and hedgerow are proposed immediately adjacent to each other.

Concern resolved, with thanks.

3.4 Treatment with herbicides is strongly discouraged, given the local wildlife site location and proximity to floodplain grazing marsh habitat. Alternative methods should be used instead, irrespective of the abundance of undesirable species. The only times herbicide should be used is when eradicating invasive non-native species as listed under Schedule 9 of the Wildlife and Countryside Act 1981.

Does not appear to be addressed.

3.5 The practicality of management of other neutral grassland and modified grassland strips immediately adjacent to each other in the southeast of the site has potential to lead to mismanagement. It is advised to either have wholly as other neutral grassland or modified grassland.

The reasoning behind this has been justified.

3.6 It is advised not to flail the hedgerow, given the other neutral grassland is to be established at the base. Heavy machinery will likely cause destruction of this habitat. A circular saw is the preferred option.

Does not appear to be addressed.

3.7 The Landscape Proposals (CSA, 2024) must be in accordance with the HMMP.

This includes proposed species mixes.

#### **ANY RECOMMENDED CONDITIONS:**

If minded to approve:

*Informative –*

Scenario 1: BNG Required

*Condition*

**Habitat Management and Monitoring Plan (HMMP)**

**Pre-Commencement Condition:**

The development hereby permitted shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the Biodiversity Gain Plan and including:

- (a) a non-technical summary;
- (b) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the Biodiversity Gain Plan, together with a timetable for its provision;
- (c) the management measures to maintain habitat in accordance with the Biodiversity Gain Plan from the completion of development; and
- (d) management responsibilities of the people or organisation(s) delivering the HMMP

has been submitted to, and approved in writing by, the Local Planning Authority.

The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP. Any proposed or retained planting, which within a period of 5 years after the completion of development, dies, is removed, or becomes seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

**Reason:** To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 and Policy 31 of the Horsham District Planning Framework (2015).

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| <b>NAME:</b>       | Linsey King<br>Ecology Officer (Planning)                              |
| <b>DEPARTMENT:</b> | Strategic Planning - Specialists                                       |
| <b>DATE:</b>       | 05/06/2026<br><a href="#">18/08/2026</a><br><a href="#">23/09/2026</a> |