HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	King George V Playing Fields, Partridge Green, Horsham, West Sussex
DESCRIPTION:	Multi-use Games Area (MUGA)
REFERENCE:	DC/25/0721
RECOMMENDATION:	Advice

SUMMARY OF COMMENTS & RECOMMENDATION:

The baseline within the BNG assessment is incorrect, and the user has not adhered to the metric user guide when completing the calculation tool. As such, the scheme does not meet the national 10% requirement, and many amendments and additional information is required alongside the Biodiversity Gain Plan to discharge the deemed biodiversity gain condition.

MAIN COMMENTS:

Given the received concerns with the BNG Assessment made in the above application, I have been instructed to respond to the assessment post-committee decision, as the finalised BNG plans are yet to be received to discharge the deemed pre-commencement condition.

Having reviewed the BNG plans and accompanying report within the above application, I have the following issues:

1. *Baseline*

The baseline habitat of the site has been assessed to be modified grassland in poor condition. Note that there is no botanical species list or completed condition assessment sheet (which are HDC's local validation requirements) to evidence this conclusion.

Nonetheless, this conclusion is considered incorrect. Not only was the field survey undertaken in January 2025, which is a sub-optimal time of year, but my recent site visit (17th November 2025 – also sub-optimal) identified more than 8 vascular plant species per m^2 (see example photo below, which was taken approximately in the centre of the red line boundary) and therefore is automatically considered at least moderate condition. All other criterions (apart from Criterion B, although this is difficult to ascertain due to mowing regime) were passed resulting in an overall good condition. With further survey visits at an optimal time of year, it is likely it could also be argued the grassland passes three of the four criteria within the UKHab classification for other neutral grassland (as it already comprises the appropriate botanical species).



2. *Post-development*

The report states that the overall net gain on the site will be 14.51%, however the metric calculation tool states 10.04%, and therefore claims of exceeding the national requirement is not accepted. However, the calculation is considered incorrect as the rules of the metric have not been followed.

Specifically, 3x trees of a medium size class are proposed, and has been inputted as such. However, as per the metric user guide, all trees to be planted should be entered as a small size class.

It is also noted that the development proposes to remove all existing grassland, to then create grassland in a higher condition. The appropriateness of this is questioned, however given the baseline is incorrect, this will need to be redone. It is encouraged that a section of grassland is enhanced to reach other neutral grassland in good condition, and recreational access is restricted to reduce damage. Whilst the location of the trees is considered acceptable (although more climate resilient species are advised), note that the introduction of shading will become a limitation to any grassland enhancements in this area.

3. *Draft HMMP*

No draft HMMP has been submitted as per HDCs local validation list. As such, one is expected to be produced alongside the Biodiversity Gain Plan, detailing the management practices necessary to achieve the target condition criterions of the proposed habitats.

Note that if the changes to the metric result in an overall net change in 0.5 units, or the net gain relates to creation of high or very high distinctiveness habitats, then the BNG

proposal would be considered significant on-site BNG, and it is advised to secure any such gains within a S106 legal agreement. Monitoring reports would typically be required in years 1,2,5,10,15,20,25 and 30.

ANY RECOMMENDED CONDITIONS:

Informative:

Scenario 1: BNG Required

Pre-commencement condition:

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

- a non-technical summary;
- 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; and
- the management measures to maintain habitat in accordance with the Biodiversity Gain Plan from the completion of development.

has been submitted to, and approved in writing by, the local planning authority.

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).

Regulatory Condition:

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).

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	17/11/2025