



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Leonardslee Gardens Brighton Road Lower Beeding West Sussex
DESCRIPTION:	Extension to the visitor entrance building to house a new ticket sales area and café; Infilling roof to the former generator block courtyard, re-roofing of the Alpine House and internal/external reconfigurations and link extension; Single storey winter garden conservatory to the Stable Block; Terrace extension to the east and internal/ external reconfigurations; Change of use from redundant staff offices and staff accommodation within the stable block to guest accommodation including extension to Honey Cottage; Change of use to the partial first floor of the Red House to staff accommodation; Small WC extension, reinstated chimney stack, and roof alterations to the Engine House; Lightweight wedding pavilion to the lawn, south of Leonardslee House; Landscaping changes including to the forecourt of Leonardslee House.
REFERENCE:	DC/25/1146
RECOMMENDATION:	Holding Objection / Modification
SUMMARY OF COMMENTS & RECOMMENDATION:	
The submitted metric demonstrates that the development will have a 11.38% net gain (+0.12 units) in area habitats, and a 260.61% net gain (+0.09 units). However, the red line boundary with the overall application and the BNG assessment do not match, and there are several metric amendments requested as detailed below.	
MAIN COMMENTS: The comments below relate only the BNG proposal within the above application. Please note however, that the comments are not necessarily exhaustive. All other ecology matters will be reviewed by Place Services and/or NatureSpace, where necessary.	
As it currently stands, the metric calculation tool demonstrates that the development will have a 11.38% net gain (+0.12 units) in area habitats, and a 260.61% net gain (+0.09 units). If minded to approve the application, as the net gain in the area habitat module relates to habitats of medium distinctiveness, and given this is a major application, this triggers HDC's definition on what is considered significant on-site BNG. Therefore, the	

BNG will need to be secured by a legal agreement and monitoring reports submitted typically in years 1,2,5,10,15,20,25 and 30.

As per the metric user guide, the BNG assessment must be applied to all land within the red line boundary. However, the BNG assessments have been made on the individual sites where works are due to take place, which does not match the red line boundary of the submitted application as per the site location plan. As such, one of these needs to be amended; either the overall red line boundary needs to be split or amended to stick to access tracks only (comprising of sealed surface), or the BNG assessment needs to be redone to include all habitats within the red line boundary. If possible and in agreement with the Case Officer, I would advise doing the former option.

Metric

1.0 It is noted in Section 3.13 of the BNG report (Temple, July 2025) that it states:

It is important to understand the phasing of clearance of habitats and to set reasonable assumptions about when habitat creation will take place. Where appropriate such assumptions are identified. Habitat loss/clearance is assumed to take place at the start of construction. Habitat enhancement or creation within the Site is planned to be in a phased approach covering 20 years, including 10 phases at two-year intervals. Habitat enhancement or creation within the Site is assumed to have a 'delay in starting habitat creation' of 2 years for creation of habitats onsite.

However, no time delay has been inputted into the metric for the post-intervention enhancement and creation proposals. In addition, the consequences of the above statement need to be clearly communicated for the purposes of drafting a legal agreement.

1.1 Many of the entries within the metric have an area (ha) or length (km) of 0, which is being flagged on our internal BNG reviewing software. Please can these entries be amended/removed where appropriate.

1.2 With reference to rural tree entries in the metric, Refs 84 – 87, all retention = 0.0041ha. However, different size classes of tree are proposed to be retained, and 1x small tree = 0.0041ha. There are 3x medium trees that are also to be retained. Please increase the hectarage to reflect the medium size class (1x medium = 0.0163ha).

1.3 0.0075ha of modified grassland (Ref 79 in metric) enhanced to ONG in moderate condition, however it is not clear as to where this is located. It is assumed this area is for the Wedding Pavilion, however confirmation should be sought on the location as the areas do not match that stated in the associated Preliminary Ecological Appraisal (PEA) (Temple, 2023).

Strategic Significance

2.0 The site in its entirety falls within the St Leonards Watershed Biodiversity Opportunity Area (BOA), and the high potential sites of the Wilder Horsham District Nature Recovery Network. As such, in line with HDC's BNG webpage guidance, habitats at both baseline and post-intervention that are listed within the BOA profile should be assigned as having high strategic significance (i.e., woodland and species-rich hedgerows). All other habitats at baseline and post-intervention with a biodiversity value greater than zero, as calculated by the metric, should be assigned as having a medium strategic significance.

Entrance Building

3.0 T45 (small goat willow) is marked as being removed within the Arboricultural Impact Assessment (Temple, 2025), however there is no inclusion of the loss of this tree within the metric. It is considered partially within the red line boundary, and as it is being removed to facilitate the development, it must be included. Note that all tree removals should be subject to a ground level roost assessment.

3.1 Table 3.1 of the associated PEA (Temple, 2025) states that bare ground was present on-site, which has its own classification and biodiversity value within the metric. However, this has not been included – please can this be amended.

Clock Tower Café

4.0 It is noted that the whole of the application area is also marked as wood pasture and parkland priority habitat in MAGIC maps, and the woodland within the Clock Tower Café is also priority habitat (lowland mixed deciduous woodland). However, having visited the site, it is agreed that the presence of non-native tree species, lack of grazing and lack of open heathland renders this habitat degraded and no longer contains the required characteristics. and with regards to the Clock Tower Café site, it is agreed that the habitat can be classified as other woodland; mixed. Although, it is noted that having discussed the nature of the works with the Applicant, the works comprise the installation of a terrace adjoining the existing building and will over sail much of the current vegetation (except for trimming where required and a couple of tree losses – see T118 and T119 in the AIA, Temple 2024, both small DBH).

4.1 It is also noted that tree T107 is also marked as being removed in the AIA, however this does not appear to be accounted for within the metric. Please can this be amended.

Engine House

5.0 During the site visit, a hedgerow was apparent running alongside the southern edge of the building. The agent informed me that this hedgerow is due to be removed, but retained and translocated. If this hedgerow fails to survive the translocation, a new one will be planted in its place of the same classification. However, this hedgerow is not marked in the metric at baseline, and a species-rich hedgerow is present on the post-intervention habitat map, but not within the metric. Please can this be corrected in the metric and on the maps. Note that the translocation and remedial action will need to be noted in the forthcoming HMMP.

5.1 It is also acknowledged that this site falls within an area of ancient woodland, as mapped on defra's MAGIC mapping. However, it is agreed (see section 4.6 in the PEA, Temple 2023) that the works will not result in any deterioration or removal of ancient woodland habitat, and the immediately surrounding area within the gardens is heavily modified with the introduction of footpaths and unvegetated unsealed surface. Therefore, no bespoke compensation strategy is necessary. Any lighting introduced as part of the development should be sympathetic to wildlife (see details in section 4.15 and 4.16 of the PEA) to ensure the dark corridors are retained, and the recommendations for habitat protection and pollution prevention must be followed.

5.2 The condition assessment for the Engine House within both the BNG report and PEA show that the modified grassland at baseline was scored as being in moderate condition. However, the corresponding condition in the metric have been inputted as poor. Please can this be amended.

Village Complex

6.0 The metric user comments states that 7x small trees are to be retained, and out of the 2 medium trees present on site, 1x of these will be removed. However, as per section 1.23 of the BNG report, it states the main house forecourt will require removal of trees including T97 (medium Japanese cedar), T98 (small windmill palm), T122-T125 (small windmill palms), and partial removal of G13 (trees with small DBH) and G16 (trees with small DBH). T122-T125 are not marked to be removed in the AIA (Temple, 2025), and therefore further confirmation is also sought on the removal of these trees. Note that all tree removals should be subject to a ground level roost assessment.

6.1 The metric also states that 3x small trees in poor condition will be created, however it is not clear where these will be located on the post-intervention habitat map. Please can this detail be added.

6.2 The native hedgerow should include more than 1x native species and inclusion of sweet box as mentioned in the landscaping strategy is not considered appropriate. The sweet box should be located outside of the proposed hedgerow area.

Former Generator Block

7.0 It is noted that the baseline habitat maps within the BNG report and PEA (Temple, 2023) for this site are different. Please can the correct one be confirmed. It is also noted that the condition assessment sheets appended to the PEA and BNG report mention mixed scrub on-site, however this has not been accounted for in the metric. Please can further clarity be sought on this point.

HMMP

8.0 A HMMP is required for the legal agreement. This should comprise target condition criterions for all habitats to be created and enhanced, species compositions and proportions, the management techniques required to meet the target condition by year 30, and any proposed risks, trigger points and remedial measures.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative

Scenario 1 – BNG required

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	09/10/2025