



## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Stonehouse Farm Handcross Road Plummers Plain West Sussex
<b>DESCRIPTION:</b>	<p>Full Planning Application to form a comprehensive masterplan including:</p> <ol style="list-style-type: none"><li>1. Rationalisation and enhancement of existing commercial facilities (Use Classes E(g) B2 and B8 at Stonehouse Business Park including demolition of two buildings and their replacement with new Class E(g), B2 and B8 facilities. Extension of existing building to form a new office and wardens' accommodation. Existing mobile home removed.</li><li>2. Decommissioning of the Anaerobic Digester and re-use of the existing 2no buildings for storage and office uses (Class E (g) and B8) and the diversion of a public footpath.</li><li>3. Residential redevelopment of the Jacksons Farm site including the demolition of existing barns to provide 3no. dwellings with access, parking, and landscaping.</li></ol>
<b>REFERENCE:</b>	DC/25/0403
<b>RECOMMENDATION:</b>	<b>Holding Objection / More Information</b>

### **SUMMARY OF COMMENTS & RECOMMENDATION:**

A metric for the whole development has been provided, which demonstrates an overall net gain of 27.65% in area habitats (+1.28) and 23.05% net gain in hedgerows (+2.60 units). However, the trading rules have not been met for bramble and mixed scrub and therefore on-site habitat plan amendments or purchasing of habitat bank units will be required for these trading rules to be met.

There are outstanding concerns pertaining to Jackson's Ridge, and further issues regarding discrepancies between the site wide illustrative masterplan and individual site plan and the figures proposed for hedgerow loss and creation at the anaerobic digester plant and main livestock building site.

The holding objection remains due to the discrepancies in red line boundaries for the BNG assessment and planning application at Jackson's Ridge, and the question regarding ownership of the tree line.

~~In response to the initial consultation comments, the ecologists argue the need for an overall metric. Justification is provided below, and it is advised that this be forthcoming during the planning application stage. In addition, the BNG assessment for Jackson's~~

~~Farm has changed, with the red line being amended and hedgerows removed from the baseline. Further evidence is requested to justify this and note that even with amendment of the red line for the BNG assessment, there are still concerns with regards to consistency across documents and the existing hedgerow on-site. Elements are also missing from the draft HMMP.~~

~~The BNG proposals for the three sites are considered appropriate and feasible. It is noted that Jacksons Ridge has an overall net loss, due to the land becoming private ownership and thus these habitats cannot be secured. It is recommended that an overall metric is provided to determine whether the 10% requirement has been met across all three sites. If it has, then no further action is required with regards to offsetting the net loss at Jacksons Ridge. More information is required with regards to the retention of the hedgerow/tree line at Jacksons Ridge, condition assessments for baseline and post-intervention habitats are requested, and further metric amendments are necessary prior to grant of planning permission.~~

#### **MAIN COMMENTS:**

The comments below relate to the BNG proposal(s) within the above application. All other ecology matters will be reviewed by Place Services.

The BNG proposal within the attached has an overall net unit change of 3.06 across the 3x sites and is therefore considered significant on-site BNG. A S106 legal agreement will be required to secure the BNG, and monitoring reports will need to be submitted to HDC in years 1,2,5,10,15,20,25 and 30. Note that the 3.06 figure is subject to change with any subsequent amendments as suggested below.

It is noted in the Planning Statement that the application is to be phased, with the Stonehouse Business Park, Anaerobic Digester (AD) Plant and Main Livestock Building, and Jackson's Ridge as individual phases. Note that to discharge the deemed general biodiversity gain condition, an Overall Biodiversity Gain Plan will need to be submitted and approved by HDC prior to commencement of the development. An overall metric will also need to be provided, to demonstrate how the development overall will reach a 10% net gain. It is strongly advised to submit this prior to grant of planning permission for review, to avoid any delay or risk of refusal at the discharge of condition stage. Note that if the BNG proposals as they currently stand reach a 10% overall, then habitat bank units or off-site offsetting will not be required.

A Phased Biodiversity Gain Plan for each phase must be submitted to and approved by HDC before the development of that phase can begin. These must illustrate how these phases contribute towards achieving the overall 10% as per the Overall Biodiversity Gain Plan. These must be accompanied by the individual phase metrics and HMMPs.

**In response to the ecologist's BNG technical note comments:**

For the purpose of discharging the Overall BGP, an overall statutory metric is required, with the overall area matching that of the whole development site. This is with reference to Paragraphs 057 and 059 (Reference ID: 74-057-20240214, Reference ID: 74-059-20240214) of the BNG PPG and section 6.1 of the Overall BGP Form (mandatory document), whereby calculations should show the pre- and post- development biodiversity value of the entire development and of each phase:

#### **6.1 Biodiversity metric calculations**

Calculations should show the pre-development biodiversity value and the proposed post-development biodiversity value of the entire development and of each phase.

At present, the metrics submitted are for each phase, and not for the entire development. It is recommended that these documents are submitted during the planning application process to reduce the risk of delay or refusal of the Overall BGP.

It is noted that the applicant does not wish to account for the unit deficit at Jackson's Ridge by delivering on the other phases, as they wish to keep the BNG provision across each phase of the development separate. As such, the applicant will proceed with the purchase of habitat bank units to offset the unit deficit at Jackson's Ridge. However, HDC will only require the unit deficit (if any) for the entire development to be offset to reach the 10% requirement.

A combined metric for all three phases has been provided – concern resolved, with thanks. It should be noted that, although the whole development has an overall net gain of 27.65% in area habitats (+1.28) and 23.05% net gain in hedgerows (+2.60 units), the trading rules have not been met for bramble and mixed scrub. As such, the post-development habitat plans will need to be amended, or alternatively additional units bought on the off-site BNG market to ensure the trading rules are met.

### **Stonehouse Business Park**

As currently presented, the metric for this phase has a biodiversity impact score of +0.33 Habitat Units (+166.07% net gain) and +0.78 **0.82** Hedgerow Units (+18.59 **18.86**% net gain).

#### *Strategic Significance*

As the BNG Assessment (CSA Environmental, 2025) has correctly identified, the entirety of the site falls within a high potential site of the Wilder Horsham District Nature Recovery Network, and as a result medium strategic significance has been assigned to habitats with a biodiversity value greater than zero. However, the site also falls within The St Leonards Watershed Biodiversity Opportunity Area (BOA), and we therefore advise as per our webpage guidance that any habitats at baseline or post-intervention listed in the profile of this BOA be assigned as having high strategic significance (in the case of this site, this would include species-rich hedgerows). This would change the calculation to have a +18.86% net gain (+0.82 units) in the hedgerow module, which further benefits the development.

**This concern was raised to ensure consistency across applications. This has been amended within the metric. Resolved, with thanks.**

#### *Condition Assessment*

Note there is no condition assessment sheet provided in the BNG Assessment for Ruderal/Ephemeral habitat. Please can this be provided prior to grant of planning permission.

**Concern resolved, with thanks.**

#### *Management*

It is noted that non-native and ornamental hedgerow with trees (H2b) contains a treeline of tall Leyland cypress, with frequent cotoneaster and abundant cherry laurel. Hedgerow H27a also contains buddleia. Note that some cotoneaster species are listed under Schedule 9 of the Wildlife and Countryside Act 1981. In the scope of further enhancements, it is recommended that these species are removed from the habitat, and non-invasive / native species are planted in their place.

The ecologist has proposed that the cotoneaster species are removed from the hedgerows where it does not require the removal of the entire hedgerow feature and supplemented with non-invasive / native species. This is welcome, and it is advisable to add such detail to the draft HMMP.

### **Anaerobic Digester (AD) Plant and Main Livestock Building**

As currently presented, the metric for this phase has a biodiversity impact score of +0.77 Habitat Units (+18.37% net gain) and +1.70 **1.78** Hedgerow Units (+25.10 **25.68**% net gain).

It has been noted that the baseline has changed. Specifically, there is less modified grassland at baseline (was 0.601, now 0.517ha), however hectarage to be retained remains the same (0.509ha). There is also less modified grassland to be created (was 0.336, now 0.271ha).

Additionally, there is less existing native hedgerow to be retained (was 0.321 km of 0.35km, now 0.24km of 0.35km) and 540m of hedgerow will be retained which is less than before (620m). More species-rich native hedgerow is now proposed to be created in 'good condition' (was 0.104km, now 0.132km).

With the above amendments, the metric calculation for the anaerobic digester plant and main livestock building demonstrates the site will have a higher on-site net increase for area habitats units (was +0.77 units, 18.37%, now +0.82, 20.37%) and a lower on-site net change for hedgerow units (was +1.78 units, 25.68%, now +1.50 units, 21.59%) than before.

It has been highlighted that landscape mitigation planting was conditioned under DC/19/112 (see DISC/20/0293), which included installation of a bund with 3x trees, a new native hedgerow with trees along the eastern boundary of the site, and a new hedgerow along the access road. The latter hedgerow has been created (but not to the full extent), however the former two have not. It is noted that with the removal of 3x trees and proposed extension to hedgerow H13 that would be necessary for the previous condition, the BNG is still meeting the 10% requirement. Note that creation of a hedgerow along the eastern boundary has not been included in any BNG calculations, but modified grassland is proposed in this location instead.

The illustrative site-wide masterplan has identified the south of the site as woodland planting; however, it is currently marked for retained modified grassland and creation of hedgerows. If the applicant wanted to continue with this, it is advised to include this within the post-development plans and metric, as any S106 legal agreement for BNG will be tied to the land.

It is not understood how 132m of species-rich native hedgerow is being created along H28, when the amount lost within the metric is stated as 110m. Please can further clarity be sought on this point.

### *Strategic Significance*

As the ecologists have correctly identified, the entirety of the site falls within high potential site of the Wilder Horsham District Nature Recovery Network, and as a result medium strategic significance has been assigned to habitats with a biodiversity value greater than zero. However, the site also falls within The St Leonards Watershed Biodiversity Opportunity Area (BOA), and we therefore advise as per our webpage guidance that any habitats at baseline or post-intervention listed in the profile of this BOA be assigned as having high strategic significance (in the case of this site, this would include species-rich hedgerows). This would change the calculation to have a +25.68% net gain (+1.78 units) in the hedgerow module, which further benefits the development.

This concern was raised to ensure consistency across applications. This has been amended within the metric. Resolved, with thanks.

#### *Condition Assessment*

Note there is no condition assessment sheet provided in the BNG Assessment for Ruderal/Ephemeral habitat. Please can this be provided prior to grant of planning permission.

**Concern resolved, with thanks.**

#### **Jacksons Ridge**

As currently presented, the metric for this phase has a biodiversity impact score of -0.52 Habitat Units (- 46.58%) and 0.00 Hedgerow Units (0.00% net gain)

The net loss is because the habitats will be coming into private ownership, and therefore these are considered lost and replaced as vegetated garden. However, no linear features have been marked as lost. Please can confirmation therefore be sought on whether these hedgerows/tree lines will not be within private ownership.

The ecologist states that it has been confirmed that hedgerows H8 (western boundary) and H1 (northern boundary) occur outside of the red line boundary and as such will not be included within the private ownership of any new dwellings. As such, these linear features have been removed from the statutory metric. However, it is not clear if this is the case, given that there is a wire fence encompassing some of these trees/hedgerows – see photographs below. Please can evidence of the land title plan be submitted to the Case Officer to clarify this point.



*^Trees within the fence line.*



*^Trees outside of the fence line.*

It is also noted that the red line boundary for this phase has only changed for the BNG assessment, and not for the application as a whole. The red line boundary needs to be consistent throughout the application. In addition, as can be seen below, sections of hedgerow H1 are still within the 'new' red line boundary and must therefore be recorded as on-site as part of the baseline. The red line boundary does not appear to be amended to omit H8 either, and therefore this must also still be recorded in the baseline.



*Original - BNG Design State Report (CSA Feb 2025)*



*Revised – BNG Design State Report (CSA Feb 2025 REV D).*

It is recommended to consult the HDC Arboricultural Officer on the likelihood of effective retention of the tree line/hedgerow, considering the incursions within the RPAs.

**All outstanding comments in blue above for Jacksons Ridge do not appear to be addressed.**

#### *Meeting 10%*

In the absence of an overall metric demonstrating that the 10% requirement can be reached for this development, a clear statement of intent is requested as to how the 10% requirement will be met for Jacksons Ridge. Options of purchasing habitat bank units or offsetting off-site on applicant-owned land are provided within the BNG Assessment. Note that there may be scope to offer more on-site options at the Stonehouse Business Park and Anaerobic Digester (AD) Plant and Main Livestock Building, particularly to connect the habitats along the site peripheries.

**It has been confirmed that the applicant wishes to purchase habitat bank units to offset the deficit at Jackson's Ridge. This is irrespective of what the overall development net gain is, as the applicant wishes to address the phases separately. As stipulated above, HDC will only require evidence (within Overall BGP) of the offsetting for the unit deficit (if any) for the whole development, to reach 10% overall.**

#### *Metric errors*

Note, that Mycelia flags the following errors in the metric:

- In D-2 Off-Site Habitat Creation, ref 1, the *habitat type* is “”. This *habitat type* is invalid.
- In D-2 Off-Site Habitat Creation, ref 1, the *strategic significance* is “”. This *strategic significance* is invalid.

The metric will need to be amended prior to grant of planning permission.

**Whilst the ecologist states that this is ‘irrelevant’ at this stage, it is being highlighted so it can be rectified during the amendment of the metric for other concerns, and for the purposes of how the software runs. Given that the hedgerows have been removed from the updated metric submitted in response to my comments, this indeed is no longer relevant as the D-2 hedgerow tab is disregarded.**

**Draft HMMP**

It is noted that no draft (overall) HMMP has been provided, as per HDC's local validation list. It is therefore requested that the condition assessment criterions for the proposed habitats to be created/enhanced are provided, and summary information on the management practices to achieve these. A full Overall HMMP will be required with the Overall Biodiversity Gain Plan, and individual Phase HMMPs will be required with the Phased Biodiversity Gain Plans.

**It is noted that only one draft HMMP is on the portal as of June 2025, and therefore revisions cannot be compared with the original that the ecologist states was prepared for the submission.**

It is noted that the habitats listed within the draft HMMP are divided by phase (site name) and this should suffice for the legal agreement and phased BGPs. Please can all target condition criterion for hedgerows be included for ease of monitoring.

For the proposed SuDS (as entered within the metric) to reach a moderate condition at the Anaerobic Digester (AD) Plant and Main Livestock Building site, the draft HMMP lists the habitat as a non-priority pond to reach a poor condition. Please can the target habitat be further clarified (and if the SuDS entry is a precautionary approach). Also note that SuDS has been proposed at Stonehouse Business Park, to reach a moderate condition. This is missing from the draft HMMP.

**ANY RECOMMENDED CONDITIONS:**

If minded to approve:

Informative Scenario 2: BNG Required + Phased Development

<b>NAME:</b>	Linsey King Ecology Officer (Planning)
<b>DEPARTMENT:</b>	Strategic Planning - Specialists
<b>DATE:</b>	16/05/2025 17/06/2025 21/08/2025