



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Stonehouse Farm Handcross Road Plummers Plain West Sussex
DESCRIPTION:	<p>Full Planning Application to form a comprehensive masterplan including:</p> <ol style="list-style-type: none"> 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. 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. 3. Residential redevelopment of the Jacksons Farm site including the demolition of existing barns to provide 3no. dwellings with access, parking, and landscaping.
REFERENCE:	DC/25/0403
RECOMMENDATION:	More Information
<p>SUMMARY OF COMMENTS & RECOMMENDATION:</p> <p>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.</p>	
<p>MAIN COMMENTS:</p> <p>The comments below relate to the BNG proposal(s) within the above application. All other ecology matters will be reviewed by Place Services.</p> <p>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</p>	

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.

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 Hedgerow Units (+18.59% 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.

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.

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.

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 Hedgerow Units (+25.10% net gain).

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.

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.

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.

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.

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.

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.

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 criteria 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.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative Scenario 2: BNG Required + Phased Development

NAME:

Linsey King
Ecology Officer (Planning)

DEPARTMENT:

Strategic Planning - Specialists

DATE:

16/05/2025