



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Danefold House Littleworth Lane Partridge Green West Sussex
DESCRIPTION:	Relocation of existing farmyard manure storage, construction of a silage clamp and construction of a slurry lagoon incorporating importation and use of materials and all associated engineering works.
REFERENCE:	DC/25/1023
RECOMMENDATION:	Advice / No Objection
SUMMARY OF COMMENTS & RECOMMENDATION: It appears that the BNG will all be delivered on-site within the red line boundary, as per the amendments to Figure 3 within the BNG Impact Calculation Report (The Ecology Co-op, October 2025 Issue no. 2). The proposal now also includes creation of mixed scrub and a larger area of other neutral grassland, and thus the metric calculation tool now demonstrates the development will have a 38.66% net gain (+2.01 units) in area habitats on-site. These amendments are welcome from a biodiversity point of view. However, the off-site tabs are still completed within the updated metric, and as such the overall net gain figures (+45.18% / +2.35 units) are currently inflated. These will need to be removed prior to submission of the Biodiversity Gain Plan to discharge the deemed biodiversity gain condition. Note, the requirement of a HMMP for the legal agreement still stands. The BNG is considered feasible, and the calculation demonstrates that as it stands, the development will have an overall 13.59% net gain (+0.71 units) in area habitats. Further advice is offered to simplify the securement process.	
MAIN COMMENTS: The comments below relate to the BNG proposal within the above application; however, these comments may not be exhaustive. Note that any other ecology matters will be reviewed by Place Services and/or NatureSpace. As currently submitted, the BNG for this development proposes both on- and off-site delivery. In this instance, as the gains on-site relate to habitats of medium distinctiveness, this is considered significant on-site BNG in line with HDC's definition, and as such will require a legal agreement to secure and monitoring reports submitted in years 1,2,5,10,15,20,25 and 30. Note that all off-site BNG automatically needs a legal	

agreement to secure, as it requires one to register the land on the Biodiversity Gain Sites Register which is a mandatory requirement. However, please see my comments below under the 'off-site BNG' heading.

Irreplaceable and Priority Habitat

The woodland to the west of the site (Furzefield Wood) is priority woodland (Lowland Mixed Deciduous Woodland) and the woodland to the east of the site (Moon Wood) is both priority and ancient woodland. Section 4.2 of the PEA (The Ecology Co-op, 2025) states that '*The proposed development may indirectly impact the adjacent habitats including the woodland parcels and adjacent waterbodies through increased nutrient enrichment which may reduce the soil/water quality reducing the ground flora/marginal vegetation if mitigation measures and appropriate construction are not considered.*' An appropriate buffer of 15m from the ancient woodland has been respected (although is not specifically drawn), and no development activities shall be undertaken in the buffer areas or any other tree RPAs on-site. As such, in verbal discussions with the HDC Arboricultural Officer, a planning condition is proposed to ensure compliance with the Arboricultural Survey impact Assessment and Method Statement (Owen Allpress Independent Arboricultural Consultancy, May 2025). In addition, as stated by the Environment Agency in their consultation response, the development will need to be built in line with the SSAFO Regulations 2010.

Off-site BNG

It is noted that some of the proposed grassland is within the blue line boundary (off-site), and therefore it will require a legal agreement to register on the Biodiversity Gain Sites Register. To save the additional effort and cost of registering this area, it is advised to include this area within the red line boundary (on-site) of the application if possible. This will reduce the overall net gain provided from 13.59% to 12.72%, however the net unit change of 0.71 will remain the same. The on-site BNG will still be subject to a legal agreement and will require management and monitoring for 30 years.

HMMP

Note that a HMMP will be required for any legal agreement. Consideration will be needed for appropriate management of other neutral grassland within the ancient woodland buffer zone.

ANY RECOMMENDED CONDITIONS:

Informative

Scenario 1: BNG Required.

6.8 Arboricultural Method Statement - Implementation

Regulatory Condition: All works shall be executed in full accordance with the submitted Arboricultural Impact Assessment/Method Statement [Arboricultural Survey impact Assessment and Method Statement, 2682 Rev-01, Owen Allpress Independent Arboricultural Consultancy May 2025 **or latest**].

Reason: To ensure the successful and satisfactory protection of important trees, shrubs and hedges on the site in accordance with Policies 30 and 33 of the Horsham District Planning Framework (2015).

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists

DATE:	18/08/2025 13/11/2025
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