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Development Management
Horsham District Council,
Albery House,
Springfield Road,
Horsham,
West Sussex
RH12 2GB

14 April 2026

Discharge of Pre-Commencement Planning Conditions

Planning Application Ref: DC/25/0446 - Crays Barn, Crays Lane, Goose Green, Pulborough

Dear Sir / Madam,

We write on behalf of our client, Mr Stuart Jolliff of Jolliff Homes Ltd, in respect of the above planning permission, which was granted on 13 February 2026 for the demolition of 2no. agricultural buildings and the erection of 3no. dwellings at the above site.

We are now writing to seek the formal discharge of the pre-commencement planning conditions attached to the permission, specifically Conditions 3, 4, and 5 (Parts a–c), together with a note on Condition 6. We are also simultaneously submitting the statutory Biodiversity Gain Plan required under Paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990, as inserted by the Environment Act 2021, for the Council's approval prior to commencement of development. Supporting documents are enclosed with this letter as referenced below.

CONDITION 3 – Construction Site Set-Up Details

Condition 3 requires that, prior to any development including demolition, details of the construction site set-up are submitted to and approved in writing by the Local Planning Authority, covering:

- (a) the location for loading and unloading of plant and materials, site offices, and storage of plant and materials (including any stripped topsoil); and
- (b) the provision of wheel washing facilities (if necessary) and dust suppression facilities.

Proposed Construction Site Set-Up

Given the modest scale of this development (3 dwellings on a 0.08 ha site), the following construction site management arrangements are proposed:

Loading, Unloading and Plant Storage:

All deliveries of plant and materials will be received within the existing access track and hardstanding areas forming the site entrance off Crays Lane. The existing concrete and asphalt hardstanding within the site boundary will be utilised for the storage of plant, equipment and materials during the demolition and construction phases, thereby avoiding any use of the public highway.

Site Office:

A temporary site welfare unit/office will be positioned within the existing hardstanding area to the south of the barn footprint, as indicated on the approved site plan (Drawing No. HB-03). This location avoids the proposed garden areas and is accessible from the access track.

Stripped Topsoil:

Any topsoil stripped during groundworks will be stockpiled within the site boundary, in the eastern portion of the site, in areas designated within the proposed garden areas, and will be retained for reinstatement during landscaping works.

Wheel Washing:

In view of the rural location, the access track, and the predominantly clay ground conditions at the site, a temporary wheel wash facility will be installed at the site exit onto Crays Lane prior to any demolition or earthworks commencing. This will be supplemented by road sweeping as required to prevent mud being deposited on the public highway.

Dust Suppression:

Dust suppression measures will be implemented throughout the demolition and construction phases including dampening of arisings during dry weather, covering of stockpiled materials, and use of enclosed skips where appropriate. Given that the barn roof and capping materials have been confirmed to contain chrysotile asbestos (see Condition 5 below), the asbestos removal will be undertaken by a licensed contractor in advance of general demolition works and in strict compliance with the Control of Asbestos Regulations 2012, which will inherently control dust release during that phase of works.

We confirm that the above arrangements will be adhered to throughout the entire construction period, in accordance with Condition 3.

CONDITION 4 – Drainage Strategy

Condition 4 requires that a drainage strategy detailing the proposed means of foul and surface water disposal is submitted and approved prior to any development other than demolition commencing.

Foul Water Drainage

The site is in a rural location and is not served by a public foul sewer. As shown on the Proposed Site Services and Drainage drawing (Drawing No. NFA037HB09 / HB-09), the existing sewage treatment plant on site is to be retained and will serve the three proposed dwellings. The capacity of the existing sewage treatment plant is sufficient for the proposed use. No connection to the public sewer is proposed or required.

Surface Water Drainage

The site lies within Flood Zone 1 (very low probability of flooding from rivers and sea). The underlying geology comprises the Weald Clay Formation, which is classified as unproductive in terms of aquifer designation and has very low to low permeability. As such, infiltration via soakaways is unlikely to be appropriate.

Surface water from the proposed dwellings and hardstanding areas will be managed as follows:

- Roof drainage from the three dwellings will be directed to rainwater harvesting or attenuation as part of the building drainage design, with controlled discharge to the ground where ground conditions allow or via a surface water run-off system.
- Surface water run-off from hardstanding and access areas will be minimised through the use of permeable paving surfaces where practical, consistent with the approved site plan (Drawing No. HB-03) and landscaping strategy.
- No surface water will be permitted to drain to the foul water sewer.

The Proposed Site Services drawing (Drawing No. HB-09, submitted with the original application) illustrates the layout of services including the sewage treatment plant, borehole pumphouse, mains water supply, BT connections, and proposed electrical connection. The drainage approach above is consistent with the submitted proposals.

We confirm that the development will be carried out in accordance with the above drainage strategy.

CONDITION 5 – Contamination and Asbestos

Condition 5 requires the submission and approval of a scheme to deal with the risks associated with contamination (including asbestos contamination) of the site. The condition is structured in four parts (a)–(d), each contingent on the outcome of the preceding stage. We set out below how each part has been addressed, with reference to the enclosed technical reports.

Part (a) – Preliminary Risk Assessment

The following enclosed document addresses Part (a):

- Phase 1: Desktop Study and Preliminary Risk Assessment, prepared by YourEnvironment (Report Ref. YEX2150, June 2021) on behalf of Jolliff Developments Limited.

The Phase 1 report identifies all previous uses of the site (agricultural from at least 1875 with a large agricultural barn in situ since approximately 1999), all potential contaminants associated with those uses, a Conceptual Site Model (CSM) setting out sources, pathways and receptors, and a qualitative risk assessment of potentially unacceptable risks.

The principal potential contaminant sources identified were: made ground soils possibly containing metals and organic compounds (TPH, PAH, VOCs/SVOCs); asbestos-containing materials (ACMs) in the corrugated roofing; agricultural machinery storage; and off-site historical land uses. Potential receptors included future residential end users, construction workers, and controlled waters. Risk ratings ranged from Moderate/Low to Low for all identified linkages, reflecting the relatively benign site history.

The Phase 1 report recommended an intrusive site investigation to quantify risks, and an asbestos demolition survey in advance of any demolition works.

Part (b) – Intrusive Site Investigation

The following enclosed documents address Part (b):

- Phase II Site Investigation Report, prepared by H Fraser Consulting Ltd (Report Ref. 31066R1, 22 January 2025) on behalf of Jolliff Developments Ltd.
- High Barn Farm – Addendum Technical Note (Ref. 31066TN1, 25 June 2025), prepared by H Fraser Consulting Ltd in response to comments from Horsham District Council.

The Phase II investigation incorporated data from two phases of site investigation:

Phase 1 geotechnical investigation (May 2021): Three mini percussive boreholes to a maximum depth of 5.45 m bgl with SPTs and laboratory analysis of metals, PAH, BTEX, MTBE, phenols, SOM, pH, sulphates, and asbestos screening across eight soil samples.

Phase 2 investigation (December 2024): Six trial pits (TPo1–TPo6) to a depth of 1.2 m bgl across the proposed garden areas (including three positions under the existing floor slab), with ten soil samples submitted to Normec DETS Limited for analysis (metals/metalloids, pH, sulphate, phenols, speciated PAH, asbestos screen, FOC, TPH CWG, and VOCs).

Ground conditions comprised grass topsoil or reinforced concrete (0–0.1 m), underlain by made ground (maximum 0.48 m thickness) of brown slightly silty clay, chalk deposits and small brick pieces, overlying brown mottled clay (Weald Clay Formation). No groundwater was encountered and no visual or olfactory evidence of contamination was observed.

A Generic Quantitative Risk Assessment (GQRA) was undertaken comparing soil data against Land Quality Management (LQM)/CIEH Suitable for Use Levels (S₄ULs) for residential land use (with and without home-grown vegetables, 1% SOM). Key findings were:

- Asbestos: No asbestos was detected in any soil sample from either investigation phase.
- PAHs: All speciated PAH concentrations from the December 2024 investigation were below laboratory detection limits. PAH concentrations from the May 2021 investigation (where detected) were all below GACs.
- Metals and metalloids: All concentrations below GACs, with the exception of beryllium at TPO₄ (0.5–1.2 m depth, 2.3 mg/kg vs. S₄UL of 1.7 mg/kg) and lead at WSo₂ (0.4 m depth, 466 mg/kg vs. S₄UL of 200 mg/kg). However, average concentrations across the site for both analytes are below the relevant GACs, giving good evidence that risks to human health are acceptable.
- TPH: All TPH concentrations substantially below relevant GACs.
- Phenols, BTEX, MTBE, VOCs: All below detection limits.

The Addendum Technical Note (31066TN1, June 2025) was prepared in direct response to the Council's earlier comments regarding the Phase II investigation, specifically:

- Photographs of trial pits: Photographs are appended to the addendum, confirming a methodical approach with clear records of location, depth, and spoil for each trial pit. No visual contamination was observed in any trial pit.
- Supervision: The works were undertaken by CK Drilling Ltd, directed by Kris Sunderland (24 years' ground investigation experience). The addendum explains that whilst consultant supervision is preferable, the data generated are considered sufficiently reliable given the low contamination risk, comparable results with the earlier investigation, and the competence and photographic records provided by the contractor.
- Adequacy of investigation: The total of nine sampling locations across 800 m² (18 samples to a maximum depth of 2.1 m bgl) equates to a grid spacing of approximately 9 m and 1 sample per 93 m³. This is consistent with BS 10175 guidance on non-targeted sampling density for main investigations (10–25 m centres), and is considered adequate for the proposed land use.

Part (c) – Remediation

As set out in the Phase II Site Investigation Report (31066R1), given the relatively benign historic land use and the results of both site investigation campaigns, risks to human health and the environment from soil contaminants at the site are assessed as low. No remediation works are considered necessary. The site is suitable for the proposed residential use.

In respect of asbestos within the buildings, the enclosed Asbestos Demolition Survey Report addresses this separately (see below). Appropriate health and safety measures will be implemented to protect construction workers during demolition and construction works as required.

Part (d) – Verification Plan

As no remediation is required, a verification plan under Part (d) is not applicable. The site investigation results themselves serve as verification that soil contamination does not present an unacceptable risk to future end users.

Asbestos Demolition Survey

In addition to the contamination reports, we enclose the following document which directly addresses the asbestos aspect of Condition 5:

- Asbestos Demolition Survey Report, prepared by Crucial Environmental Ltd (Report Ref. C-10078, 13 April 2021) on behalf of Stuart Jolliff, in accordance with HSG264 and UKAS procedures.

The survey was carried out on 9 April 2021 and identified the following asbestos-containing materials (ACMs) in the barn structures on site:

- Soo2: Cement capping (bolted, 50 lin m) – Chrysotile confirmed, Material Assessment Score 3 (Very Low). Recommendation: Remove – Non-Licensed Material.
- Soo3: Corrugated cement roof sheeting including ridge vents (300 m²) – Chrysotile confirmed, Material Assessment Score 4 (Very Low). Recommendation: Remove – Non-Licensed Material.
- Soo4: Cement capping (bolted, 50 lin m) – Chrysotile confirmed, Material Assessment Score 4 (Very Low). Recommendation: Remove – Non-Licensed Material.
- Soo5: Corrugated cement roof (Store, 20 m²) – Chrysotile confirmed, Material Assessment Score 4 (Very Low). Recommendation: Remove – Non-Licensed Material.
- Soo6: Corrugated cement roof (300 m²) – Chrysotile confirmed, Material Assessment Score 4 (Very Low). Recommendation: Remove – Non-Licensed Material.
- Soo8: Two redundant cement roofing slates found within barn – Chrysotile confirmed, Material Assessment Score 4 (Very Low). Recommendation: Remove – Non-Licensed Material.

Two samples (Soo1 and Soo7 – end capping and cement debris respectively) returned No Asbestos Detected (NAD). All identified ACMs are categorised as Very Low risk and comprise non-licensed chrysotile composite materials in good to low-damage condition.

All ACMs will be removed by a licensed asbestos contractor prior to general demolition works and in full compliance with the Control of Asbestos Regulations 2012. Where notifiable to the Health and Safety Executive, notifications will be made in the required timeframe. The removal methodology will be included within the Construction Management arrangements.

CONDITION 6 – Schedule of Materials and Finishes (Pre-Slab Level)

We note that Condition 6 is a Pre-Commencement (Slab Level) Condition, requiring submission prior to any new-build development above ground floor slab level, rather than prior to demolition commencing. This condition is therefore not a pre-commencement condition in the strictest sense and does not need to be discharged prior to demolition works.

For the avoidance of doubt, we confirm that we will submit a full schedule of materials, finishes, and colours for external walls, windows, and roofs for approval prior to any new-build development proceeding above slab level, and we will seek separate approval of this information at the appropriate stage.

BIODIVERSITY GAIN PLAN – Statutory Submission

Pursuant to Paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 (as inserted by the Environment Act 2021), development may not begin unless a Biodiversity Gain Plan has been submitted to and approved by the Local Planning Authority. We hereby submit the Biodiversity Gain Plan for this permission for the Council's consideration and approval.

Ecological Survey and Baseline

A walkover survey of the site was carried out by The Ecology Co-op on 4 December 2024 to establish the baseline ecological conditions. No ecological constraints were identified and no Phase 2 surveys were recommended. The existing habitats within the site comprise three parcels of modified grassland (all in poor condition), the existing agricultural buildings, and hardstanding/sealed surfaces. The on-site calculated baseline biodiversity value is 0.09 habitat units, assessed in accordance with the Statutory Biodiversity Metric.

Biodiversity Net Gain Strategy

The Biodiversity Gain Plan confirms that the 10% mandatory net gain requirement set out in the Environment Act 2021 will be met entirely on-site through habitat retention and creation, with no off-site units and no statutory biodiversity credits required. The BNG hierarchy principles of avoiding habitat loss, enhancing baseline habitat, and compensating through creation of new on-site habitat have been applied to the design of the development.

The proposed development will result in the loss of 0.046ha of modified grassland (poor condition), 0.086ha of buildings, and 0.058ha of developed/sealed land. Post-development, the following habitats will be created on-site: 0.073ha vegetated garden, 0.032ha unvegetated garden, 0.042ha artificial unvegetated unsealed surface, and 0.044ha of buildings. No irreplaceable habitats are present within or adjacent to the site boundary.

Metric Results

The Statutory Biodiversity Metric calculation, undertaken by The Ecology Co-op (Project No. P6742), demonstrates the following headline results:

- Pre-development biodiversity value: 0.09 habitat units (area); 0.00 hedgerow units; 0.00 watercourse units.
- Post-development biodiversity value: 0.14 habitat units (area); 0.00 hedgerow units; 0.00 watercourse units.
- Net change: +0.05 habitat units (+51.82%).

- BNG trading rules: satisfied for all distinctiveness groups.

The scheme therefore meets the mandatory minimum 10% biodiversity net gain requirement and the no net loss through development goals of Horsham District Council. No Section 106 agreement is required to secure the on-site gains, as the net unit gain of 0.05 falls below HDC's 0.5-unit threshold for S106 securing.

Biodiversity Enhancement Strategy

In addition to the metric-counted habitat creation, a Biodiversity Enhancement Strategy (BES) has been prepared by The Ecology Co-op (Project No. 6742, Rev01, 12 March 2025) to deliver further ecological enhancements beyond those captured in the BIC. The following measures are proposed, noting that hedgerows and trees within private gardens cannot contribute to BNG but are provided as additional voluntary enhancements:

- Native species-rich hedgerow planting along the northern site boundary and running east to west between the three plots on the western boundary, comprising at least 50% hawthorn or blackthorn with a mix of at least five additional native woody species.
- Six native trees (sourced from UK stock) planted along the northern, eastern and southern borders of the site, selected from an approved list of appropriate native species.
- Two bat boxes or two bat access tiles per dwelling (six in total), installed at a minimum height of 3.5 metres above ground, facing south-east and away from lighting. Bat access tiles to use bitumen lining rather than breathable membranes.
- House sparrow nesting opportunities on one dwelling (either groups of five individual sparrow boxes or two 1SP Schwegler Sparrow Terraces per building), positioned at a minimum of 2m above ground facing north or east.
- Four swift boxes installed together on one dwelling, positioned at a minimum of 5m above ground on a non-south-facing elevation with clear unobstructed access.

External lighting across the development will be designed in accordance with Bat Conservation Trust guidance (Guidance Note 8), using warm-spectrum lighting (peak wavelength >550nm, colour temperature <2700K), with no upward light spill and directional fittings to minimise impacts on bat commuting routes and nocturnal invertebrates.

Post-construction management responsibilities and a detailed annual work schedule for all green assets are set out in the BES and will be passed to the developer and future occupiers. A suitably qualified ecologist will oversee implementation and undertake a post-construction inspection to confirm compliance.

Relevant Date for Pre-Development Biodiversity Value

As recorded in the Biodiversity Gain Plan form, the relevant date for the pre-development biodiversity value is 12 March 2025, which is the date of the ecological survey and Biodiversity Impact Calculation, rather than the date of the original planning application. This earlier date has been used in accordance with current DEFRA guidance.

SUMMARY OF ENCLOSED DOCUMENTS

The following documents are enclosed with this letter in support of the discharge of Conditions 3, 4, and 5, and the statutory Biodiversity Gain Plan submission:

Condition 3 – Construction Site Set-Up:

- Proposed construction site set-up details as described in this letter above (no separate drawing required at this stage).

Condition 4 – Drainage Strategy:

- Drawing No. NFA037HB09 / HB-09 – Proposed Site Services and Drainage (New Form Architecture) [submitted with original application and re-enclosed].

Condition 5 – Contamination and Asbestos:

- Phase 1: Desktop Study and Preliminary Risk Assessment (YourEnvironment, Report Ref. YEX2150, June 2021).
- Phase II Site Investigation Report (H Fraser Consulting Ltd, Ref. 31066R1, 22 January 2025).
- High Barn Farm – Addendum Technical Note (H Fraser Consulting Ltd, Ref. 31066TN1, 25 June 2025).
- Asbestos Demolition Survey Report (Crucial Environmental Ltd, Ref. C-10078, 13 April 2021).
- Superseded Phase II Geotechnical Investigation and Appendices (Your Environment, May 2021) [referenced within the Phase II Report].

Statutory Biodiversity Gain Plan – Schedule 7A Submission:

- Biodiversity Gain Plan (statutory DEFRA form, Planning Application Ref. DC/25/0446, dated 13 April 2026) – signed by the responsible person on behalf of New Form Architecture Ltd.
- Biodiversity Impact Calculation Report (The Ecology Co-op, Project No. P6742, 12 March 2025) – including Statutory Biodiversity Metric condition assessments and pre-development baseline habitat survey report and UKHAB maps.
- Statutory Biodiversity Net Gain Metric Calculation Tool (The Ecology Co-op, file ref. P6742 High Barn Statutory BNG Metric ISSUE) – Excel spreadsheet submitted separately in accordance with the LPA's requirements.
- Biodiversity Enhancement Strategy Report (The Ecology Co-op, Project No. 6742, Rev01, 12 March 2025) – including post-development habitat map, species-rich hedgerow and native tree planting proposals, bat roost features, swift and house sparrow boxes, post-construction management plan, and annual work schedule.

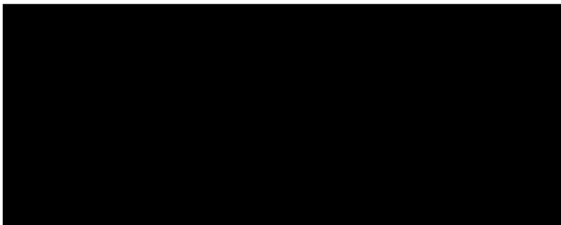
CONCLUSION

We submit that the enclosed documentation fully addresses the requirements of pre-commencement Conditions 3, 4, and 5 of planning permission DC/25/0446, and that the enclosed Biodiversity Gain Plan documentation satisfies the statutory requirements of Paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990. We respectfully request that the Local Planning Authority confirm the formal discharge of Conditions 3, 4, and 5 in writing, and provide written approval of the Biodiversity Gain Plan, prior to any commencement of development.

We confirm that development will not commence (including any works of demolition) until written approval has been received from the Local Planning Authority in respect of all pre-commencement conditions, and that all works will be carried out strictly in accordance with the approved details.

We would be grateful if you could acknowledge receipt of this letter and the enclosed documentation, and confirm the anticipated timescale for the determination of this discharge of conditions application. Should you require any further information or wish to discuss any aspect of the above, please do not hesitate to contact us.

Yours faithfully,



Angus Morrison

New Form Architecture Ltd

On behalf of Jolliff Homes Ltd