



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: An updated metric, accompanying report and HMMP have been provided. The updated metric is now considered correct, however our internal software is flagging an error with tab D1, ref 1, where there is an incomplete entry. This will need to be removed prior to submitting the Biodiversity Gain Plan. There are minor points to address in relation to the HMMP, for the purposes of the legal agreement. 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.

This has now been received, with thanks.

I would advise that, if possible, the length of the ONG sward should ideally be kept at no longer than 5cm until early spring, to allow the yellow rattle to germinate. If there is excessive growth over the winter period, an additional cut may be required in February providing ground conditions are suitable. Also, arisings should be removed from the site when dry, and in some cases 1 day to be left in situ is too short a timeframe for seeds to drop.

Note that monitoring reports will be required for HDC approval in years 1,2,5,10,15,20,25 and 30. Please amend Section 4 of the HMMP to reflect this.

Further information will be required pertaining to responsible person(s) for producing monitoring reports, when known.

Note that the extent of replacing failed trees/shrubs for mixed scrub may also extend beyond the first 2 years, to ensure that the mixed scrub habitat is delivered successfully by year 30. Given the likely pressure from deer browsing, it is appropriate to detail fencing requirements if the need arises due to excessive damage.

Please add the additional activities to the work schedule: wildflower grassland ground preparation and sewing, and mixed scrub tree/shrub planting.

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 14/01/2026