



RE: Horsham District Council Application Number: DC/22/0388
Beckley Stud, Reeds Lane, Southwater RH13 9DQ

Ref: WEc_RH13

June 2023

Dear Mr. Lee Middleton

Horsham District Council (HDC) issued a consultation letter on 15/03/2023 regarding application DC/22/0388, and this letter outlines that HDC have reviewed and refused to permit works at the above address.

Wychwood Environmental have been engaged on behalf of NJA Town Planning Ltd to assist with addressing reason 4 of refusal *'Insufficient information has been provided to demonstrate that the proposed development would have no adverse impact on protected species and its habitat, and to establish how the development will contribute to measurable Biodiversity Net Gain, contrary to Policy 31 of the Horsham District Planning Framework (2015) and Paragraphs 174 and 180 of the NPPF.'*

A Preliminary Ecological Appraisal (PEA) was conducted on 22nd May 2023 to assess the site condition and establish measures on how to contribute and enhancement Biodiversity Net Gain (BNG) within the site. In discussion on site, it is understood the site has already been subject to development and the advice supplied on this development is retrospective.

The PEA found the development area to consist entirely of hard standing, built agricultural buildings and shipping containers (Figure 1). The wider site is used as an equestrian centre, consisting of stables, a riding arena and paddocks of neutral grassland surrounded by species rich lines of trees and hedgerows. The wider landscape features pockets of open grassland, extensive woodland, residential houses with private gardens and industrial areas.

A review of DEFRA's MAGIC¹ map on 25th May 2023 returned that there are no statutory or non-statutory sites within 2km of the development site (Figure 2). No priority habitats or ancient woodland are within the site boundary, but bordering east of the site are parcels of ancient and semi-natural woodland and priority habitat deciduous woodland. The wider area contains several parcels of good quality semi-improved grassland, wood pasture and parkland BAP

¹ <https://magic.defra.gov.uk>

habitat, and traditional orchards. The Living England Habitat Map² indicates the site as acid, calcareous or neutral grassland habitat.

MAGIC returned 20 granted European Protected Species Mitigation (EPSM) licences with 2km of the site. This included 12 licenses for Great Crested Newts (GCN) *Triturus cristatus*, 5 licenses for hazel dormice and 3 licenses for bats. Bat species covered by these include common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, brandts bat *Myotis brandti* and brown long eared bats *Plecotus auratus*. The closest EPSM licence is found 560m west of the site and was granted for great crested newts. There are also 14 licence returns for ponds with GCN within 2km, the closet being 336m NW of the site. There are no ponds in or within 250m of the site.

Historic Google Earth Imagery³ was used to assess potential habitats within the site prior to development. Aerial/satellite images were obtained for the site between August 2013 and July 2022 (Table 1). Changes in habitat appear to have been undertaken in a period from August 2018 until April 2020, after which the habitat area is dominated by Hardstanding and buildings. The images also show changes to the wider site over time. Anecdotal conversations with the landowner claim that the site prior to clearance was ‘grassland dominated by ragwort *Jacobaea vulgaris*’.

Table 1: Google Earth Imagery of the site between August 2013 and July 2020.

	
August 2013	April 2015

² <https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::living-england-habitat-map-phase-4/explore?location=52.790614%2C-2.489781%2C6.92>

³ <https://earth.google.com/web/>

	
September 2015	September 2018
	
April 2020	June 2021
	
March 2022	July 2022

Based on information obtained via the site visit, Living England Habitat Map, Google Earth imagery and on site discussions, it is assumed the development area would meet the UKHabitat Classification of criteria of 'g3 – neutral grassland' (Figure 3). It is not possible to comment on species composition and condition but is not unreasonable to assume the habitat met 'poor' condition when assessed against the condition assessment criteria outlined by Natural England. This is assumed due to the dominate ragwort historically on site. However, to ensure no net gain has been lost during the intervening time to evaluating the baseline habitat; it will be given a condition assessment value of 'moderate'.

Based on the habitats within the site and those impacted by the development; it is thought that it is unlikely any works intentionally disturbed or destroyed habitats for protected species.

Assessing Biodiversity Net Gain

The development area measures approximately 2930m² and would have been eligible for a BNG assessment using the Small Sites Metric (Biodiversity Metric 4.0). The Small Sites Metric permits commercial developments under 0.5ha (5000m²) and does not require habitats to undergo a condition assessment. The 2930m² of g3 neutral grassland gives a pre-development BNG total of 2.344 habitat units. Due to the nature of the post-development consisting of hard-standing and buildings, the development area now hosts a total of 0.00 habitat units.

Enhancing On Site Biodiversity

As it stands, the current development is in a deficit of 2.344 habitat units; and is required to enhance onsite biodiversity by a further 10% (totaling 2.5784 habitat units). Due to the nature of lost habitat, g3 neutral grassland, the trading rules do not need to be satisfied which require like-for-like habitat replacement.

It was noted from the site visit and evidence from Google Earth Imagery much of the wider site has been enhanced since 2013, including planting of hedgerows and the building of a reptile hibernacula to the north-west of site. From the changes in aerial imagery; it is thought that approximately 415m of hedgerow have been planting since 2018; onsite observations recorded these as cherry laurel *Prunus laurocerasus* and coniferous *Pinopsida* species, this would contribute a total of 0.4005 hedgerow units to the site.

If HDC wishes to see new enhancements to the site; the following could be planted within the wider site to achieve >2.5784 habitat units – exceeding the mandatory 10% increase in net gain (Table 2).

Table 2: Habitat creation to achieve BNG

Habitat Type	Total	Total Habitat Units
Native Scattered Tree >90cm DBH	6	1.3416
Native Scattered Tree 30 - 90cm DBH	11	1.232
H3h Mixed Scrub	100m ²	0.08
Total Habitat Units		2.6536

Due to the wider site consisting of good quality and varied habitat; it is suggested that in lieu of habitat creation; provisions should be in place to further enhance sheltering opportunities throughout the wider site for local wildlife – this could include the features outlined below (Table 3).

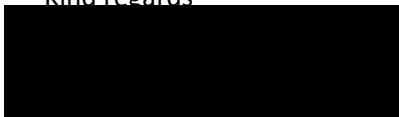
Table 3: Purposed sheltering opportunities for local wildlife.

Target Species	Sheltering Opportunity	Placement
Bats	2x Kent bat box 2 x 1FD Schwegler Bat Box Or similar for crevice and void dwelling species.	Within surrounding tree lines and scrub & on new development building. 3 – 6m off ground and south facing.
Small Birds	5 x Generic nesting bird boxes	Within surrounding trees lines and scrub; at least 3m off ground
Small Mammal Boxes	5 x Standard Dormouse nest box	Throughout surrounding tree lines and scrub
Owls	1 box with species specific design; this should be informed by local records search. e.g. barn owls.	Edge of field; near tree line
Reptile	Purpose built hibernacula	Edge of field near tree lines.

The development is thought to of had little-to-no known impacts on protected habitats or species and the mitigation and enhancement details outlined above should compensate for the loss of biodiversity by the purposed development.

Should you need any further advice on the information provided above please do not hesitate to contact me.

Kind regards



Dr. Craig Turner MCIEEM FRGS FL

Figure 1: UKHabitat Map of development area on 22/05/2023.

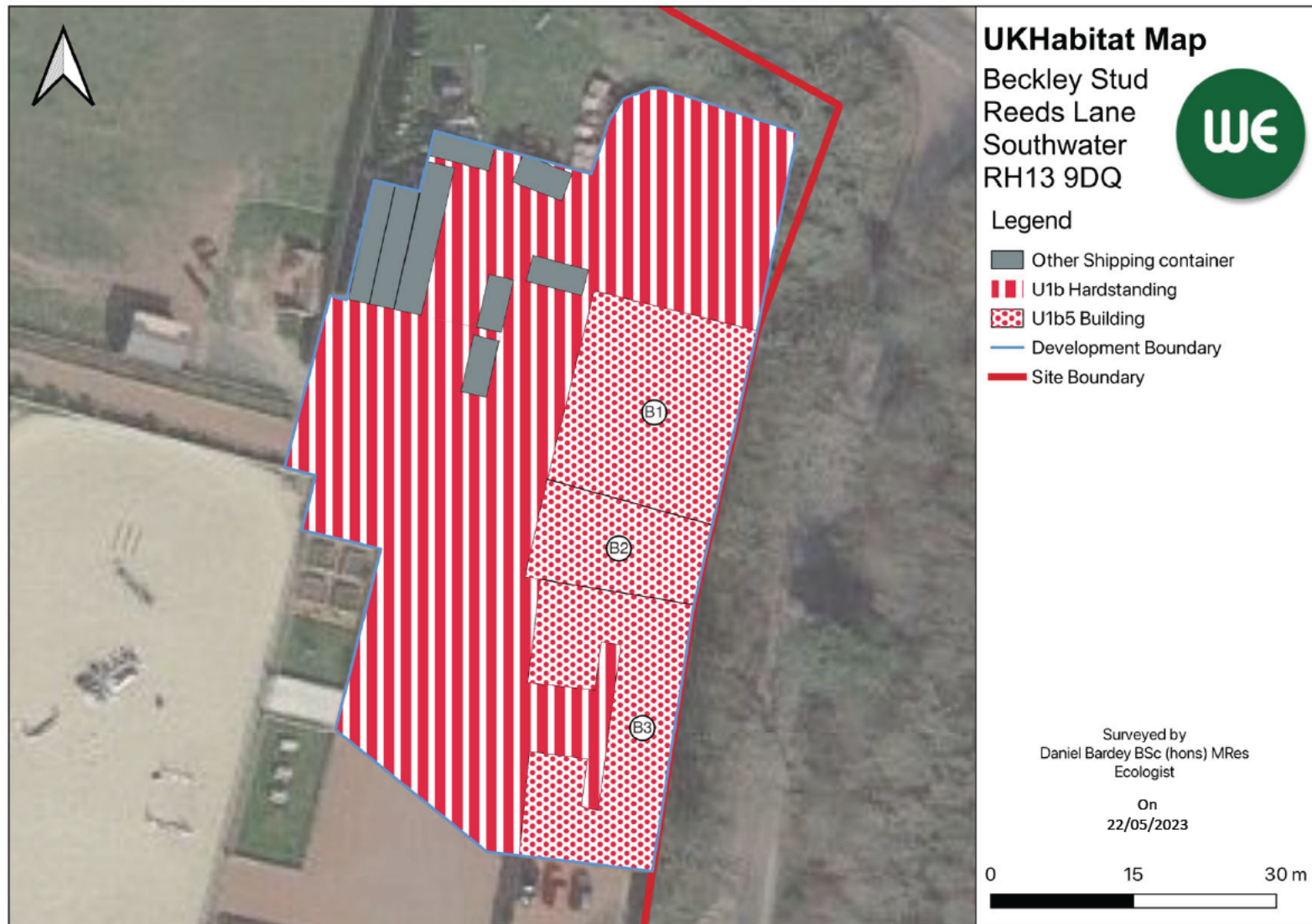
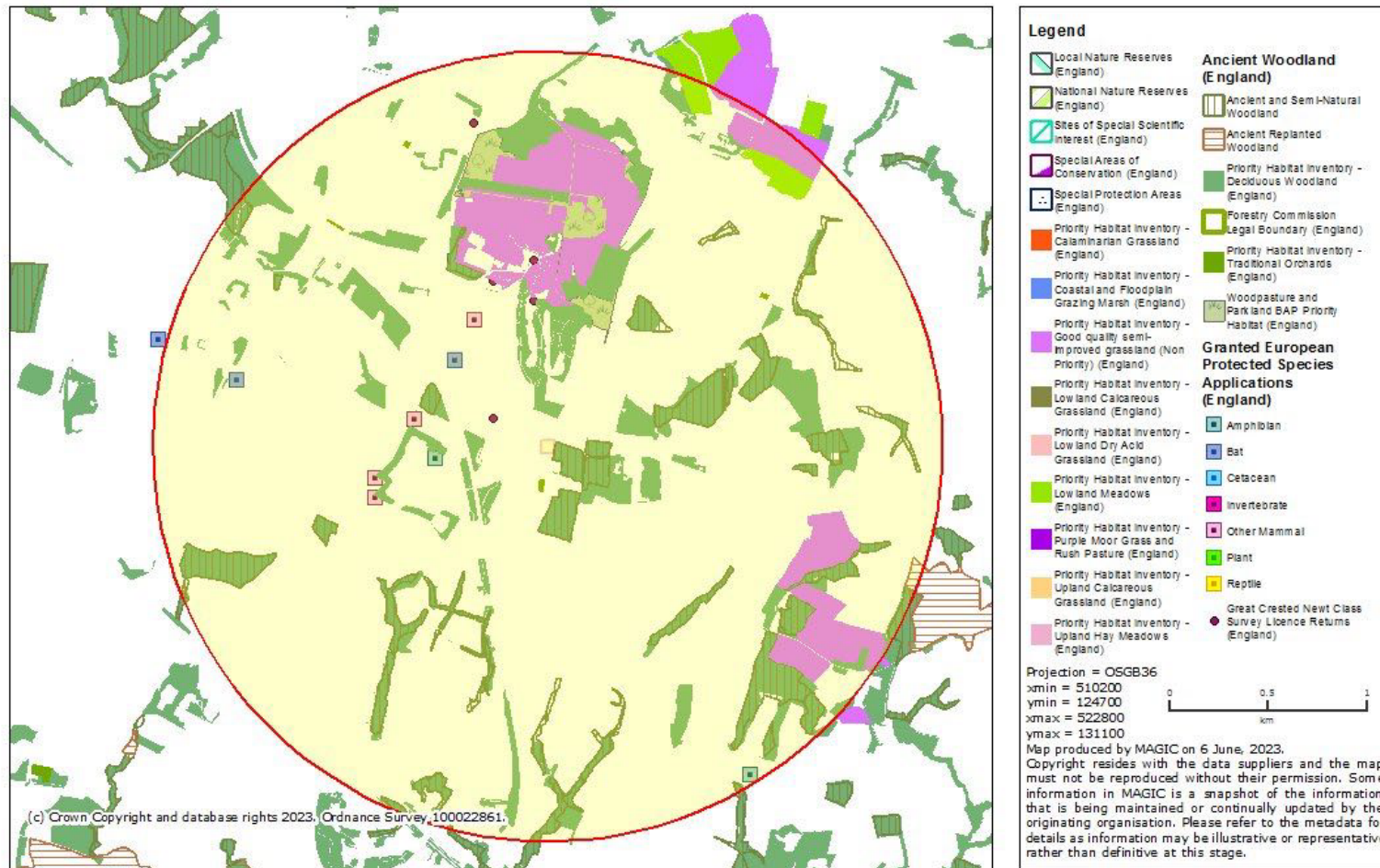


Figure 2: Results of the DEFRA MAGIC search on 25/05/2023.

MAGiC

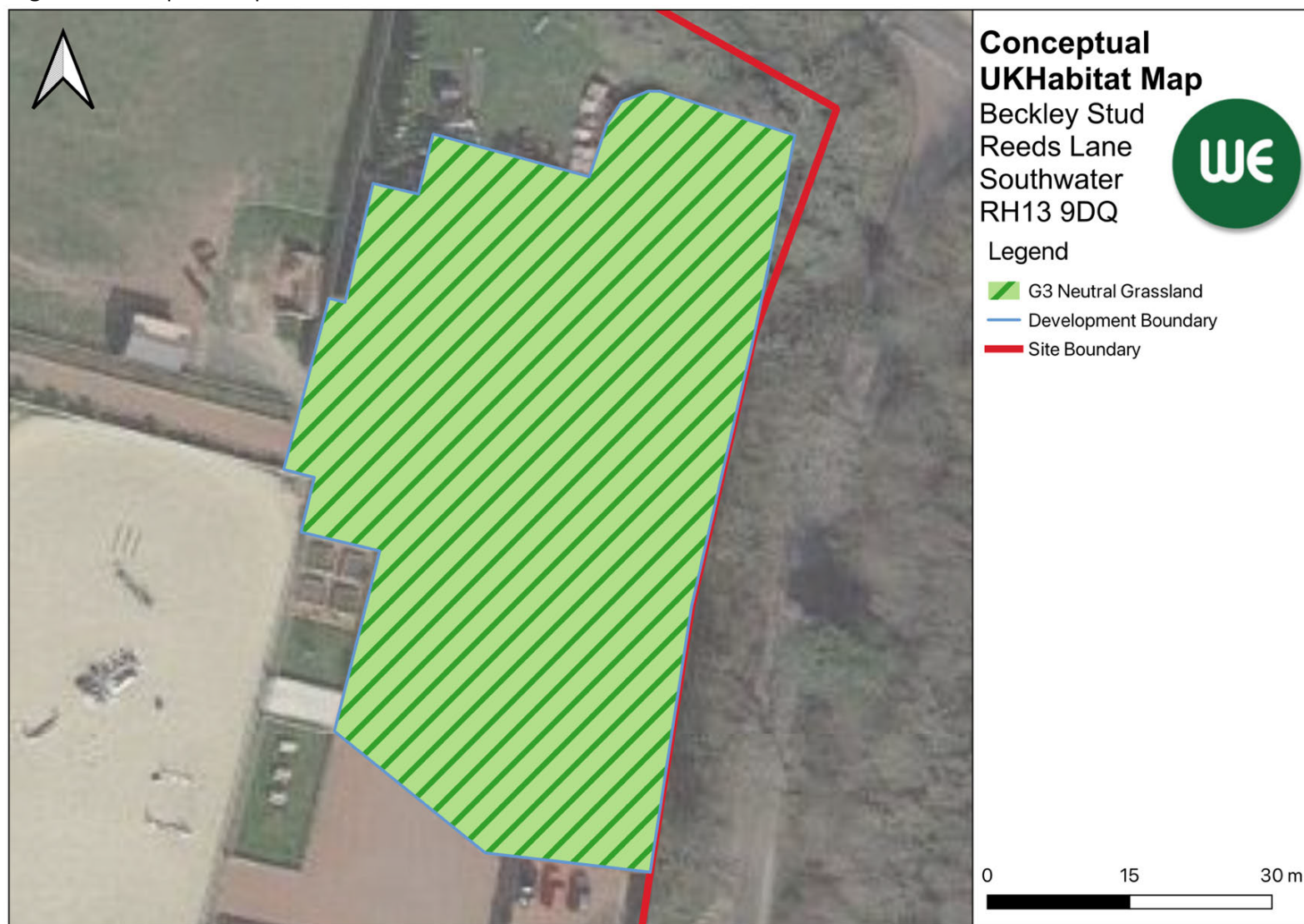


Wychwood Environmental

Tel: (+44)01306743493. Mob: (+44)07760234934

Email: craig@wychwoodenvironmental.com

Figure 3: Conceptual map of baseline habitats.



Wychwood Environmental

Tel: (+44)01306743493. Mob: (+44)07760234934

Email: craig@wychwoodenvironmental.com