

Oonagh Kerrigan
DHA Planning
Eclipse House
Eclipse Park
Sittingbourne Road
Maidstone
Kent
ME14 3EN



14 May 2026

Project reference: 251882

Dear Oonagh,

Re: Steyning Grammar School: Biodiversity Net Gain Assessment comments

Further to comments received from Horsham District Council regarding the Biodiversity Net Gain (BNG) Assessment submitted in support of the planning application at Steyning Grammar School (MKA Ecology Ltd, 2026); this letter responds to the question of whether a ditch located in proximity to the eastern boundary of the Site must be accounted for in the BNG Assessment.

For the purposes of BNG, ditches are described as “artificially created linear water-conveyancing features which are less than 5 metres wide and are likely to retain water for more than four months of the year” (Defra, 2025). Ditches should be included in a site’s BNG Assessment if the planning application boundary overlaps with the ditch or its riparian zone, which is defined as 5m from the top of each bank.

We have undertaken a desk-based review of the ditch using aerial imagery and information supplied in a condition survey (CTP, 2026). We have concluded:

- The ditch and its riparian zone is within 5m of the Site boundary used in the BNG Assessment in at least one location;
- The ditch is less than 5m wide; and

-
- The ditch is highly unlikely to retain water for more than four months of the year. CTP undertook their site visit in February 2026, and describe the section of ditch falling within 5m of the Site boundary as dry at the time of the visit, despite heavy rainfall in the days preceding the site visit. Photographic evidence is provided in the report of the dry sections of ditch in question. CTP describe the southern ditch as “generally dry with small patches of ponding locally to incoming surface water outfalls.” In subsequent email correspondence with CTP they confirmed “the only water th[is] ditch will see locally to this point is surface water from [Steyning Grammar School] during rainfall. During drier spells any residual water will dry out locally.”

Based on this evidence, we believe it is reasonable to conclude that the ditch does not hold water for more than four months of the year, and therefore does not qualify for further assessment in BNG terms.

If you have any further questions please do not hesitate to contact me.

Yours sincerely,



Lydia Ennis ACIEEM

Senior Ecologist

MKA Ecology Ltd



References

CTP (2026) *Steyning Grammar School: Condition Survey of Eastern Boundary Ditch*. SRP1121-CTP-00-EX-T-C-8410/DEIR Ref: n/a/PM_30_10_15. February 2026. B1641.

Department for Environment, Food & Rural Affairs (Defra) (2025) *The Statutory Biodiversity Metric – User Guide – July 2025*. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

MKA Ecology Ltd (2026) *Steyning Grammar School – Biodiversity Net Gain Assessment*. MKA Ecology Ltd: Cambridge.