



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Steyning Grammar Upper School Shooting Field Steyning West Sussex
DESCRIPTION:	Part-demolition of existing teaching buildings, MUGAs and all-weather pitch. Construction of replacement 2-storey and 3-storey teaching buildings, flood-lit all-weather pitch and hard surfaced sports courts, with associated access, parking, landscaping and infrastructure.
REFERENCE:	DC/26/0322
RECOMMENDATION:	Holding Objection / Modification / More information
SUMMARY OF COMMENTS & RECOMMENDATION: The biodiversity metric demonstrates that the development will have an overall 42.47% net gain (+6.59 units) in area habitat and a 388.05% net gain (+2.32 units) in hedgerows. However, a holding objection is recommended due to omission of the watercourse module of the metric, as a watercourse with running water is adjacent to the north-east corner of the red line boundary, running along the A283. Other comments are made relating to post-development habitat locations and the LEMP.	
MAIN COMMENTS: The comments below relate solely to the BNG proposed in the above application. The comments are not considered exhaustive. All other ecology matters will be reviewed by Place Services and NatureSpace, where appropriate. As currently submitted, the biodiversity metric demonstrates that the development will have an overall 42.47% net gain (+6.59 units) in area habitat and a 388.05% net gain (+2.32 units) in hedgerows. As per HDC's definition, the proposal is considered significant on-site BNG and therefore, if minded to approve, a S106 legal agreement is required to secure the BNG and monitoring reports will need to be submitted to HDC typically in years 1,2,5,10,15,20,25 and 30. Please note that the requested amendments detailed below are likely to change the final BNG figures calculated by the metric. <u>Baseline</u> 1.0 The drainage strategy details the drainage option into a nearby watercourse immediately adjacent to red line boundary via a ditch system north of the site, which includes installation of a headwall. Given the description of this watercourse within the submitted Condition Survey of Eastern Boundary Ditch report (CTP consulting engineers, 2026), it appears to hold water (including running water) and therefore should be included within the watercourse module of the metric. If the watercourse adjacent to the	

A283 meets the classification of 'other stream and river', then a River Condition Assessment undertaken by a certified person will need to be completed and the outputs of Cartographer provided to evidence the baseline and proposed net gain.

Post-development

2.0 There are many parcels of proposed other neutral grassland and modified grassland that are interspersed throughout the site (see Figure 2 within the BNG Assessment 2026, MKA Ecology). The management will need to be very clear on which parcel must meet what classification and how. For areas that will be subject to high student trampling pressures, it is advised to allocate as modified grassland to ensure that this is met in line with a legal agreement. This change will not affect the development reaching 10%.

2.1 A parcel of traditional orchard is proposed in the north-east of the site, immediately adjacent to the greenfield sports pitch (Figure 2, BNG Assessment 2026). It is questioned whether this location is appropriate, due to high levels of disturbance and likely damage, and whether other locations have been considered. Note that given this is a priority habitat, it will need to meet the JNCC definition and proposed moderate condition.

LEMP (and forthcoming HMMP)

3.0 The LEMP (WWA Landscape, 2026) that is currently submitted only covers the initial 5 years. It is acknowledged in Section 1.1 of the LEMP that a separate HMMP will be prepared by an ecologist and submitted separately. Note that the BNG must be secured for 30 years, which means that the forthcoming HMMP must cover a minimum of 30 years (whereas the LEMP only covers 5 years). The LEMP and HMMP must be in accordance with each other.

3.1 Section 9.2 of the LEMP states that all hedges shall be maintained at a maximum height of 1.5m. However, targeted condition criterion A1 for proposed species-rich native species that hedgerows will have more than a 1.5m average height along the length. Please can the LEMP be amended, or alternatively, the target condition criteria. Note by amending the target condition criteria, the proposed overall moderate condition can still be met.

3.2 It is requested that any fertiliser deemed necessary should be organic, and this be added throughout the LEMP.

3.3 Section 9.9 states that trimming of hedgerows is to be undertaken in spring and outside of bird nesting season, however these are not complimentary as the nesting bird season is accepted as March-August, which is the entirety of the spring months. Please can Section 9.9 specify the month of late winter trimming. It should ideally be late January / early February. Any trimming within March-August for the purposes of appearance should be avoided, but where it cannot be (i.e., dead limbs need to be pruned), must be subject to a nesting bird check by a qualified ecologist or arboriculturalist. This also applies to trimming and pruning of trees and any large ornamental shrubs. Trimming should ideally be done on rotation to maximise biodiversity benefits.

3.4 If persistently mowed and scarified, the need for weed killer on amenity grassland is minimal (which is also referred to in Section 14.4). Manual methods of weed removal should be adopted prior to resorting to pesticides. Please add words to this effect under Section 13.8.

3.5 There is no management prescribed to the proposed green roof, traditional orchard and other neutral grassland (which requires further maintenance beyond flowering lawn). These are expected in any forthcoming HMMP, alongside how the target condition criteria will be met via appropriate management. Please see Natural England's HMMP template and checklist for a comprehensive list of what is expected. A species composition and proportion for each habitat will be expected, in alignment with the examples provided in the PEA technical summary note (MKA Ecology, 2026), and to support the local protected and priority species as identified within the desk study (PEA technical summary note). Thorough plans of construction and cross sections of the green roof will also be expected.

3.6 There is no mention of removal of invasive non-native species (INNS) as listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), which have been identified on site (e.g., *Rhododendron ponticum*). Please can this be added.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative

Scenario 1: BNG Required

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	10/04/2026