HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Steyning Grammar Upper School Shooting Field Steyning West Sussex
DESCRIPTION:	Application for Approval of Details Reserved by Conditions 3 (Archaeology) ,4 (underground services) ,5 (Biodiversity Enhancement Strategy) and BNG (Biodiversity Net Gain) to approved application DC/26/0322 (Part-demolition of existing teaching buildings, MUGAs and all-weather pitch. Construction of replacement 2-storey and 3-storey teaching buildings, flood-lit allweather pitch and hard surfaced sports courts, with associated access, parking, landscaping and infrastructure.
REFERENCE:	DISC/26/0329
RECOMMENDATION:	More information

SUMMARY OF COMMENTS & RECOMMENDATION:

There are outstanding issues pertaining to tree planting and certainty of existing tree retention, which must be resolved prior to discharging the deemed biodiversity gain condition.

HMMP comments are listed to be addressed to discharge Condition 5, as well as the S106 obligation for BNG.

MAIN COMMENTS:

The comments below relate only to the submission to discharge the deemed biodiversity gain condition and are not considered exhaustive.

As per Para 13 under Schedule 7A of the Town and Country Planning Act 1990:

'13 (1)Every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition in sub-paragraph (2).

(2)The condition is that the development may not be begun unless—

(a)a biodiversity gain plan has been submitted to the planning authority (see paragraph 14), and

(b)the planning authority has approved the plan (see paragraph 15).'

Having reviewed the submitted Biodiversity Net Gain Assessment (MKA Ecology, 2026) and supporting metric calculation tool, it is considered that all matters under Paragraphs 14 and 15 of Schedule 7A of the TCPA 1990 have been met. However, the comments

from the HDC Landscape Officer dated 28/10/26 regarding retention of existing trees and proposed tree planting on hardstanding and near to underground services/drainage infrastructure (and their associated rooting volume ratio) are echoed, and therefore this requires resolution prior to confirming the final figures for BNG and discharging the deemed biodiversity gain condition.

HMMP comments

The below comments should be actioned to discharge the S106 obligation for BNG, however as the same document is likely being used to discharge Condition 5, it is recommended for these comments to be addressed prior to discharging the condition to ensure consistency.

1. Please detail method of weed removal throughout the HMMP, bearing in mind that herbicides should only be used as a last resort, unless eradicating invasive non-native species as listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).
2. The tree stakes should be installed during or immediately after placing the sapling in the ground, before backfilling the soil.
3. Please detail mulch collar measurements.
4. Trees should be inspected on an annual basis, and any dead, dying, or diseased trees should be replaced on a 1:1 basis in the following planting season. This is important as the number of individual trees count towards the BNG calculation, rather than number of whips per hedgerow for example. This should be detailed in the Risk Register table.
5. Please refer to taking precaution with regards to roosting bats.
6. It is preferable for hedgerows and other fruiting species to be pruned in late winter, to provide an overwinter foraging resource for local wildlife.
7. There should be no % cover of invasive species (as listed under Schedule 9 of the WCA 1981, as amended) to trigger the remedial measure. Removal should be undertaken at the earliest opportunity following initial identification.
8. Please include establishment failure in the Risk Register for all habitats.
9. Please include roles and responsibilities.
10. Please detail methods of removal for *Rhododendron ponticum*, which was identified on site in the original baseline assessment.
11. It is understood that the HMMP mentions installation of fencing around the proposed traditional orchard to help protect it from disturbance. Please can this be added to the post-development mapping.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	24/11/2026