



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Ingfield Manor School Ingfield Manor Drive Five Oaks Billingshurst
DESCRIPTION:	Expansion of the existing school including the construction of 3 linked single-storey buildings, a sports hall, playground, parking, landscaping, drainage, and associated development, following demolition of redundant buildings.
REFERENCE:	DC/26/0660
RECOMMENDATION:	Holding Objection / Modification No objection (subject to modifications at discharge of conditions/obligations stage)
SUMMARY OF COMMENTS & RECOMMENDATION: The watercourse module of the metric is still under question (see point 1.0 below) and further amendments will be required in the forthcoming final HMMP. Further evidence is requested to support the ecologist's justification for omission of the watercourse module of the metric. The comments relating to downgrading of proposed on-site grassland creation (point 2.1) and modification of the proposed landscaping species mix to the south of the site (point 2.2) remain. Amendments to the draft HMMP are also required to discharge the S106 obligation and deemed biodiversity gain condition. The metric calculation tool submitted currently demonstrates that the development will have a +15.66% net gain (+0.29 units) in area habitats and a +289.27% net gain (+0.48 units) in hedgerows. However, a holding objection is recommended on the grounds of the omission of the watercourse module in the metric. Further comments are made relating to the post-development interventions and the draft HMMP content. MAIN COMMENTS: The comments below pertain primarily to the Biodiversity Net Gain proposal as submitted in the above application. However, it should be noted that these comments are not exhaustive. All other ecology matters will be reviewed by Place Services and NatureSpace, where necessary. The metric calculation tool submitted currently demonstrates that the development will have a +20.38% +15.66% net gain (+0.38 +0.29 units) in area habitats and a +289.27% net gain (+0.48 units) in hedgerows. In accordance with HDCs significant on-	

site criteria, the proposed on-site BNG is considered significant and therefore a legal agreement to secure the delivery will be required. Monitoring reports will need to be submitted to HDC typically in years 1,2,5,10,15,20,25 and 30, and an upfront monitoring fee will need to be paid.

However, please note that the comments below may alter the final BNG calculation figures, and the trading rules are still yet to be met. This will either entail bespoke off-site habitat enhancement or purchase of habitat bank units to meet the trading rules. Please note that the woodland immediately to the south of the site is highlighted under a priority of the draft West Sussex Local Nature Recovery Strategy for woodland enhancement.

It has been highlighted that the proposal is a phased development. An Overall Biodiversity Gain Plan (OBGP) will be required to discharge the deemed pre-commencement biodiversity gain condition. The OBGP must provide details on how the development meets the 10% BNG requirement overall. Prior to commencement of each phase, a Phased Biodiversity Gain Plan (PBG) must be submitted and approved by HDC. The PBGP must detail how the BNG delivery within that phase contributes towards the overall 10%.

It is understood from recent correspondence with the Case Officer that the applicant intends to purchase off-site biodiversity units from the existing market to achieve the minimum 10% BNG requirement.

Baseline

1.0 It is noted that a ditch runs along the northern and western boundary of the site, with several culverts where access roads cross into the site. This can be seen as mapped in the Baseline Habitat Map within the Preliminary Ecological Appraisal (see Figure 4, The Ecology Co-op 2025). However, no watercourse module has been completed as part of the BNG Assessment. Having visited the site in June 2026, it was evident that the ditch does hold water due to saturated soil and areas of pooled water during a heatwave, and presence of water-loving plants such as sedge and rush species, and therefore it is also considered likely that it holds water for >4 months of the year particularly in the winter. As such, this section of ditch as previously mapped should be included within the baseline assessment, as the site falls within the 5m riparian zone. The ditch network does extend to the north-east of the site, however this was dry during the site visit and there were no signs or indicative plant species to suggest this ditch held water.



The BNG Report has been updated with a

paragraph under section 3.5 (assumptions and limitations) that this ditch has not been recorded as continuously holding water for more than four months of the year based on multiple site visits between 2024 and 2026 and anecdotal evidence from the school's groundkeepers. This contrasts with the PEA mapped habitats (recorded as UKHab other standing water, ditch [r1g 50] which excludes dry ditches) and the evidence as provided above from the site visit. As above, it is accepted that the ditch running along the north/north-east of the site is a dry ditch. Therefore, it is requested that such evidence be provided to HDC to support the comment under section 3.5 of the BNG report with regards to the western ditch. Please note that this ditch network is subject to scraping maintenance to retain its drainage function and prevent local flooding.

Limited further statements have been provided, primarily that the ditch is more than 10m from the site boundary and that as the north-eastern ditch is dry, both aspects of the ditch are expected to be dry at the same time. The first point is contested, as the site falls within c.4m of the western ditch (within 5m riparian zone), and the accesses to the north of the site cross over the existing culverts, which have also not been recorded in the BNG assessment. The second expectation was not true on the site visit, as previously detailed. It is at the discretion of the Case Officer as to whether the benefits of the development outweigh this technicality, and if minded to approve, whether such technicalities should be addressed when discharging the deemed biodiversity gain condition.

1.1 The woodland mapped within the BNG Design Stage Report (Map 3, ECOSA 2026) indicates it is moderate condition; however, both the condition assessment and metric state it is poor condition. Please can the correct condition be clarified and consistency across documents ensured when discharging the deemed biodiversity gain condition.

The mapping has been amended to demonstrate that the woodland is poor condition. Concern resolved, with thanks.

Post-development

2.0 Criterion A for other neutral grassland must be achieved to reach a moderate condition. Please amend in the HMMP under Table PM-T01 (despite it being targeted further on in the HMMP) or downgrade the proposed condition to poor (see point 2.1 below).

Grassland target remains at moderate condition. Criterion A is now targeted in table PM-T01, concern resolved with thanks.

2.1 The creation of modified grassland is listed within the post-development condition assessments and HMMP, however is not mapped within the BNG Design Stage report or metric. It is advised that areas that will be subject to high disturbance should be classified as modified grassland due to continuous damage making it unlikely to meet the condition criterions.

This has not been modified. As such, this target condition and habitat type must be achieved to avoid a breach in legal agreement. It is noted that the pockets of proposed mixed scrub creation has been downgraded from a target condition of moderate to poor.

2.2 It is noted in the Landscape Design Strategy (Lizard, 2026) that ornamental planting is planned in the south of the site surrounding the play areas. It is strongly advised to incorporate native species to the edges of this area, to prevent any non-native ornamental species spreading or setting seed in the immediately adjacent priority woodland habitat as designated in Natural England's Priority Habitat inventory.

Does not appear to be addressed. This is strongly advised, and such details should be amended and approved prior to discharging the deemed biodiversity gain condition.

A native edge has been incorporated into the south of the site in the updated Landscape Design Strategy. Concern resolved, with thanks.

Draft HMMP

3.0 A full and finalised HMMP will be required as an obligation within the legal agreement, and to support the Biodiversity Gain Plan which is required to discharge the deemed biodiversity gain condition. It is advised to review the Natural England HMMP template, checklist, and companion document for expected content. More information pertaining to the management prescriptions will also be necessary.

3.1 Please can the relevant maps (i.e., baseline and post-development) be inserted in the HMMP.

Post-development map to be added.

The ecologist states that there is no insert within the HMMP template to allow for this, and so it has been added to the BNG Design Stage document instead. Please note that there is a 'Habitat Creation, Enhancement and Management Plan' template insert (reference EM-F01) from the template Companion Document that allows for this. As the HMMP is the binding document with regards to the S106, this must be added prior to discharging the deemed biodiversity gain condition and S106 obligations.

3.2 The draft HMMP refers to spot treatment. Herbicide use should be a last resort, unless eradicating invasive non-native species as listed under Schedule 9 of the Wildlife and Countryside Act 1981. Please can words to this effect be added.

Concern resolved, with thanks.

3.3 The number of non-targeted condition criteria for hedgerow (5) exceeds the total number allowed to achieve a moderate condition (4 max.). Please amend.

To be reviewed.

3.4 Mixed scrub is proposed to be created as per the metric and BNG Design Stage Report (ECOSA, 2026) however is missing from the HMMP. Please can a section on mixed scrub be added.

Concern resolved, with thanks. More detail will be expected prior to discharging the deemed biodiversity gain condition.

3.5 Please can removal of the previously identified invasive species on-site (see 3.10 of the PEA) be detailed.

To be reviewed.

ANY RECOMMENDED CONDITIONS:

If minded to approve:

Informative –

Scenario 1: BNG Required

Scenario 2: BNG Required + Phased Development

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	23/06/2026

	17/08/2026 22/09/2026
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