

Memo

To: Planning Policy & Development Management Team
FAO: Kiran Sajjan

From: Heather Twizell

Ref: WD/3517/CC (KS)

Date: 28/03/25

Re: **GROVE PARK SCHOOL, CHURCH ROAD, CROWBOROUGH, TN26 1BN**
THE ERECTION OF A NEW SECONDARY SCHOOL BUILDING WITH ASSOCIATED OUTDOOR LEARNING AND PLAY SPACE, LANDSCAPING AND PARKING

Ecology Comments – UPDATED INFORMATION

Recommend for approval in principle subject to the imposition of conditions	The information provided is satisfactory and enables the LPA to determine that whilst the proposed development is likely to have an impact on biodiversity, those impacts can be mitigated through the application of planning conditions which are outlined in this response.	YES
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With reference to your recent re-consultation, I have now had an opportunity to consider the revised application and offer the following advice. Our previous advice (24/01/25) should be read alongside this response.

Key documents reviewed include the following:

- Cover Letter (ECE Planning, 10/03/25, Ref. MS/Let/P1949);
- Ecological Impact Assessment (EclA, Richard Graves Associates, March 2025, V3.0);
- Biodiversity Net Gain Assessment (BNGA, Richard Graves Associates, March 2025, V2.0);
- Statutory Biodiversity Metric (Metric, Dr Suzy Cardy, 14/03/25, V2.0); and
- Draft Biodiversity Gain Plan V2.0 (DBGP, unsigned, undated).

Summary of Changes

1. An updated Planning Pack has been produced to address a number of non-material design changes. These include the addition of a substation to the north of the proposed new school building to facilitate power and utilities for the development and the relocation of parking spaces to accommodate electric vehicle (EV) charging points and automated gates. All changes are listed in Appendix A of the Cover Letter and shown on the updated Landscape Layout Plan (LLP, Wynne-Williams Associates, July 2024, Drawing No. GROV-WWA-XX-XX-D-L-0102, Rev. P13).
2. Key points noted are that onsite parking provision remains unchanged, with spaces simply repositioned to accommodate new features and that no proposed trees have been removed but instead have been relocated within the site.

Policy context

3. Advice on policy context remains unchanged.

Potential impacts on biodiversity

4. The minor changes to the scheme have no bearing on the advice previously provided regarding designated sites, habitats, invasive non-native species or protected species. All advice on these matters given in our letter of 24/01/25 remains valid.

Enhancements and Biodiversity Net Gain

5. The proposed design changes and their implications for the site's biodiversity net gain (BNG) calculations are helpfully summarised in BNGA paragraph 2.7. The revised scheme will result in a net loss of -0.93 habitat units (-6.43%) where the previous loss equated to -6.65%. To meet the required minimum gain of 10% the deficit of 2.39 habitat units (a minor increase on the previous 2.34) will need to be provided through the purchase of either offsite units from a Habitat Bank or Statutory Biodiversity Credits (as stated previously this figure could be subject to change at Biodiversity Gain Plan (BGP) stage when full details will be required).
6. There are no changes to those habitats which we recommend should be treated as ['significant onsite' BNG](#), although the areas of lowland mixed deciduous woodland and other broadleaved woodland proposed for enhancement have been slightly reduced. Advice on securing the management and monitoring of BNG remains valid.
7. Our previous response raised some queries and concerns regarding the proposed woodland enhancement and the target condition selected. Some further information is now provided in the BNGA. The measures proposed seem reasonable but as before we would expect full details to come through the future BGP and Habitat Management and Monitoring Plan (HMMP).


Recommended conditions

8. Recommended conditions (including text for the general biodiversity gain condition) remain as per our previous advice.

Summary

In summary, provided the recommended mitigation, compensation and enhancement measures are implemented, the proposed development can be supported from an ecological perspective. A standard pre-commencement Biodiversity Gain Condition should also be applied, and it is recommended that in addition to any legal agreement required to secure the maintenance of significant onsite BNG for at least 30 years, the Council should also secure fees for compliance monitoring. Further advice can be provided on request.

Kind regards



Heather Twizell
Ecology Officer, East Sussex County Council