

Endon High School, Leek Road, Endon SWT Comments

Application Reference: SMD/2024/0360

Location: Endon High School, Leek Road, Endon

Proposed development: Proposed Car Park and one-way system. Relocate pedestrian Access. Existing surfaces, Grass, and Asphalt.

SWT has insufficient information to assess this application. We place a holding objection until the following documents are supplied:

- A completed statutory biodiversity metric calculation tool showing the calculations of the pre-development biodiversity value of the on-site habitat. If this shows the off-site gain site calculation that would also be appreciated.
- A preliminary ecological assessment (PEA). If the applicant believes they are exempt from providing a PEA, please provide reasons for this as detailed in 'Planning Application Validation: Staffordshire Requirements for Biodiversity and Geological Conservation'.

In addition, we have the following further comments that need addressing:

Application Form

In the application form the date that the onsite pre-development biodiversity value was calculated was 15/07/24 and the date that the metric was published was 30/07/24. The biodiversity value could not have been calculated before the metric was published. Please correct the date that the metric was published – the statutory metric was published on 12th February 2024.

The biodiversity net gain planning practice guidance states that 'As part of the planning application form, an applicant will need to identify the date being used, this is either: the date of the application; or a proposed earlier date. If the applicant proposes an earlier date, they must provide the reasons for this'. The date that the application was received is 01/08/24, please provide reasons why the date used to calculate the on-site pre-development biodiversity value is before this.

The application form states that there are designated sites, important habitats or biodiversity features that will be affected. Please provide details about these. This should be included in a PEA.

Off-site Habitat Bank

The offsite habitat bank appears to be bordered partially by hedgerows / lines of trees when looking at aerial photos. These are not included in the map in the BNG report. Please explain why these have not been included in the map. The BNG report suggests that it 'will be beneficial to wildlife if the gap between existing hedgerows on either side of this area could be bridged to improve connectivity'. It would be useful to see existing hedgerows to get context for this improvement. We welcome the Statutory Biodiversity Net Gain Assessment explaining the proposed off-site habitat enhancements.

Biodiversity Gain Plan

As BNG is a pre-commencement condition, if the application is granted planning permission, a Biodiversity Gain Plan will need to be submitted which includes a description of arrangements for maintenance and monitoring of habitat enhancement (habitat enhancement which must be maintained for at least 30 years after the development is completed). This will need to be approved to discharge the biodiversity gain condition before development can commence. The design and access statement states that BNG landscaping / planting will be carried out by the school's outdoor

gardening group. There will need to be evidence that the group can deliver and manage the BNG for 30 years.

[Other Current Applications on the same site](#)

This application appears to be similar to another application in progress – SMD/2024/0171 that we have not been consulted upon – please explain if these are different or the same. If they are different, then SMD/2024/0171 will be subject to BNG.