

Park View Farm Stoney Lane SWT Comments

Application Reference: SMD/2024/0196

Location: Park View Farm, Stoney Lane, Cauldon

Proposed Development: Proposed erection of livestock building

Staffordshire Wildlife Trust has been asked to review the above application as part of a service level agreement with Staffordshire Moorlands District Council to provide ecology advice regarding planning and development management functions.

Summary: We recommend a **holding objection** until the following information is supplied and our comments are resolved:

- Updated Biodiversity Net Gain Report
- Updated completed biodiversity metric calculation tool following changes made
- The application form updated to include BNG information
- PEA including checks for protected species
- Evidence that the mitigation hierarchy has been applied and complied with

BNG

The application states that the applicant believes the development to be exempt from BNG, this should be corrected, the development is not exempt from BNG. The application form should also include the pre-development biodiversity value, the date the onsite pre-development biodiversity value was calculated and the publication date of the metric.

The Biodiversity Metric Calculation Tool and BNG Report

We have the following comments that need addressing regarding the completed biodiversity metric calculation tool and biodiversity net gain report:

- The Biodiversity Net Gain Report states '*Please note that this report is provisional pending on the supply of adequately detailed landscape plans. This report and its accompanying calculations will be updated following the supply of these landscape plans*'. Please could the applicant confirm whether an updated report is available and supply one.
- The metric states that the habitats are not in a local strategy. This is incorrect, the location is a strategic area for grasslands as shown at <https://netgainstaffs.com/map/>. Updating the strategic significance in the metric alters the baseline and creation units.
- The trees to be planted as net gain are not within the red line boundary, therefore they should be included as off-site, not on-site area habitat creation within the metric. Providing off-site BNG would need the site to be registered as a habitat bank, therefore we would recommend either that the BNG is provided within the red line boundary or the redline boundary extended to include the BNG on-site.
- As the area is in a strategic area for grasslands, we would prefer the mitigation to provide for this habitat if possible.

- The fence should be included as on site habitat baseline urban → built linear features in the metric tool and be included on the habitat map.
- The habitat described as 'artificial unvegetated sealed' is shown in Plate 2 on p.25 of the Net Gain Report. To be artificial unvegetated sealed, there needs to have very low (<10%) cover of vegetation; the photo appears to show more vegetation cover than 10%. We can appreciate why the Ecologist has suggested this habitat as the metric tool does not have an appropriate match for the habitat on site, however we think that 'sparsely vegetated land --> ruderal / ephemeral' would be more suitable in this instance and this should be changed.
- The map (in the BNG report) should have an identified scale.

If the above changes are made, the requirement for a net gain of 10% is not met. The biodiversity units should be recalculated in the statutory biodiversity metric calculation tool and, mitigation modified so that 10% BNG is delivered.

Habitat Condition Monitoring

We would not recommend annual checks. Monitoring should be as specified in the net gain plan.

Protected Species /PEA

The Biodiversity Net Gain Report states 'The habitats on site could have the potential to support a limited number of protected species' and 'A preliminary ecological appraisal has not been commissioned and as such species specific recommendations have not been made'. To comply with wildlife legislation, protected species need to be considered in advance of a development. In light of this information, we request that a PEA that fully considers protected species is provided.

The PEA should also ensure that the mitigation hierarchy has been applied to demonstrate compliance with BS 40404:2013 section 5.2 and the NPPF paragraph 186 a).

We look forward to receiving the additional information in due course.

We may wish to make further comments on this application upon review of the additional requested information.