

Fingerpost Farm Dilhorne, Lane Dilhorne SWT Comments

Application Reference: SMD/2024/0535

Location: Fingerpost Farm Dilhorne, Lane Dilhorne

Proposed Development: Agricultural building for the storage of implements

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.

Staffordshire Wildlife Trust recommend a **holding objection** until the further information detailed below is supplied and correct and has been assessed:

BNG Minimum Information Requirements (taken from BNG Planning Practice Guidance):

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- the pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate);
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- the completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have:
 - a statement to the effect that these activities have been carried out;
 - the date immediately before these activities were carried out;
 - the pre-development biodiversity value of the onsite habitat on this date;
 - the completed metric calculation tool showing the calculations, and
 - any available supporting evidence of this;
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

The plan and BNG metric should be covering the area within the red line boundary as shown in the location map, therefore the shape and area should be the same as that identified in the location plan. The metric should be provided in its Excel format. The plan should be accurate in terms of its size, scale, habitat types and habitat dimensions. The plan should map all habitats present within the red line boundary to UKhab level or using the habitat

types in the metric. Photos or other evidence should be provided to provide evidence of the contents of the metric and habitat plan.

Aerial photos and photos in the planning statement show that part of this is a vegetated area which includes mature trees, however no vegetated habitats are shown in either the plan or BNG calculation tool baseline. Please ensure that the metric and plans submitted accurately reflect the habitats present on site.

The BNG report submitted is a 'Biodiversity Gain Plan', a Biodiversity Net Gain Report or statement should be supplied with the application at least providing the minimum validation requirements listed above, a biodiversity gain plan is required to release the biodiversity gain condition after planning permission has been granted. However, we welcome a Biodiversity Gain Plan submitted at the application stage. In light of comments made above, the submitted Biodiversity Gain Plan would not be acceptable.

Use of the Small Sites Metric (SSM):

The SSM user guide states '*Principles and rules underpin the use of the SSM. The first principle is that the SSM assessment should be completed by a competent person.*

A competent person has the knowledge and skills to perform specified tasks to complete and review SSM calculations. You obtain this through training, qualifications, experience, or a combination of them.

A competent person completing the SSM is known as the SSM 'user'. Users of the SSM should be competent in identifying:

- *habitats present on site (pre-development)*
- *management requirements for habitats to be created or enhanced within the landscape design (post-development)*

Competency is aligned with the British Standard 'Process for designing and implementing biodiversity net gain: BS 8683:2021'.

The submitted SSM metric does not show any evidence that the person that completed them met the competency requirements above. The submitted SSM needs to be completed by a competent person as detailed above. If the Statutory Biodiversity Metric Calculation Tool is used, this should also be completed by a competent person.

Protected Species

There is no assessment / mention of potential of protected species, including nesting birds or bats, and this assessment should be provided. This may require a desk study to be undertaken. The photos in the planning statement and location plan show structures and mature trees that may need to be removed to make room for the proposed development, these may require a ground level tree assessment (GLTA) / bat roost assessment. A Preliminary Ecological Appraisal (PEA) or statement from a suitably qualified Ecologist should detail as a minimum the likely presence of protected species, any further survey requirements, any ecological opportunities and reasonable avoidance measures (RAMs) or mitigation required, this should follow the mitigation hierarchy.