

Ivy House Farm Leek Road Staffordshire Wildlife Trust

Comments

Application Reference: SMD/2024/0557

Location: Ivy House Farm, Leek Road, Moorville, Cellarhead

Proposed Development: Erection of an agricultural building to store machinery and hay bales

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 following information has been supplied, assessed and resolved:

- Update application form to include habitat degradation
- Adjust the BNG metric tool to account for habitat degradation and delay in reaching intended condition
- Carry out a Preliminary Ecological Appraisal (PEA) with particular consideration of the impacts of construction and operation to bats and nesting birds.
- Update the application red line boundary so that it is consistent with the red line boundary in the BNG report.

Further Detail

Application Form

The application form states that there has not been any loss (or degradation) of any onsite habitat(s), resulting from activities carried out before the date the onsite pre-development biodiversity value was calculated. The BNG report states '*3.2.1 The survey and desk study indicated that activities have been carried out between the 30th of January 2020 and the date of application that would have degraded the baseline habitats. This includes degradation of the grassland.*'. The metric was filled in on 27/11/24. Therefore, there has been loss and degradation of on-site habitats before the date that the on-site pre-development biodiversity value was calculated. The application form needs to be updated to reflect this.

Habitat Degradation and the Statutory BNG Metric Calculation Tool

The three years (estimated degradation time June 2022) of degraded habitat is not accounted for in the Statutory Biodiversity Metric calculation tool. This should be recalculated and any adjustments to values and mitigation applied.

In relation to recording degraded sites in the metric, the Statutory Biodiversity Metric User Guide states the following:

'Accounting for degraded sites

If a habitat has been cleared, destroyed or degraded previously, and you should use an earlier baseline, you must:

- *use the pre-degradation habitat type as the site's baseline*
- *evidence how this habitat type and condition has been determined in the user comments*
- *record the habitat as lost within the biodiversity metric tool*
- *account for the time between the habitat loss and compensation using the 'delay in starting habitat creation or enhancement' function.*

Advanced or delayed action

You should adjust the temporal risk multiplier to account for any time difference between the loss and compensation, use the:

- *'delay in starting habitat creation or enhancement' function to reflect the number of years the habitat is absent i.e. from clearance of the habitat to the start of habitat compensation for the loss'.*

The steps detailed above should be taken to account for the degraded modified grassland that is being retained and time that it will take for the 0.0047ha retained grassland to reach target condition. This means the modified grassland (that is being retained and bought back to moderate condition) will need to be inputted into the metric as lost and then created with a delay of 3 years as the estimated date of degradation is June 2022. This does not account for the 0.0384ha degraded modified grassland that is being lost and replaced by hard standing / a building. This habitat has been input in predicted condition before degradation but the three years of degradation are not accounted for. Therefore this needs to be taken into account when detailing mitigation to ensure that 10% net gain is delivered as currently the metric calculation does not account for this previous loss. The biodiversity statement should clearly explain how this has been taken into account and Net Gain Plan should also account for this.

Preliminary Ecological Appraisal (PEA)

To fully assess the BNG implications of the proposed development we require a PEA or Ecological statement to be completed by a suitably qualified and experienced ecologist. This will carry out a data search and assess any impacts on ecology, biodiversity or protected species. It should be presented in full in an ecology report or statement referencing methodologies used, etc and proposing any further surveys, suitable mitigation and compensation measures as required.

Red Line Boundary

The red line boundary in the 'proposed layout' is different to the red line boundary in the BNG report which includes areas for BNG delivery. The application boundary should be updated so that it is the same as the boundary in the BNG report.

Planning Conditions

The planting of 16 native species trees of local provenance should be secured through a planning condition. It is noted that the enhancement is close to a watercourse. Delivery of the mitigation - i.e. planting of trees should be outside of the riparian zone i.e. 10 metres from the top of each bank. This is key as, if the riparian zone is impacted, it will need to be surveyed and included in the BNG metric calculations and mitigation provided for watercourses.