

Slurry Tank Greenway Bank, Knypersley SWT

Comments

Application Reference: SMD/2024/0483

Location: Slurry tank Greenway Bank, Knypersley

Proposed Development: Proposed erection of Slurry Tower at Greenway Bank Farm to provide sufficient storage for Slurry produced at the farm in a 6 month period

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.

Documents Viewed:

- BNG Report, Harvey Hughes, October 2024
- Biodiversity net gain (BNG) feasibility, Harvey Hughes, October 2024
- Justification Report for the Proposed Slurry Store at Greenway Bank Farm, Brindley Ford, ST8 7QX, Harvey Hughes, not dated
- Application form
- Site location plan go2plan 25.10.24
- Proposed plan and elevation go2plan 31.10.24

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

- An air assessment (including ammonia) such as SCAIL carried out to look at the impacts on nearby ancient woodlands and also Knypersley Reservoir
- Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application

BNG Metric

This is a minor comment. The Gain plan states: *'The remaining portion of the proposed development (735m²) will only see temporary disturbance for access during construction phase. Of this 735m² – 140m² is modified grassland which has previously received hardcore and is now overgrown with grass, 176m² is sealed road surface as part of the farm drive at the southern end of the development and 419m² is compacted, hardcore track'*. This has all been inputted into the metric as 'Developed land – sealed surface'. Given this description, the wrong metric habitat type may have been inputted, some may be Artificial unvegetated – unsealed surface. As both have no value, if the habitat type needs updating, this should be done before the metric is submitted as part of the biodiversity gain plan if the application is approved. UKHab definitions are below:

U1b Developed land – sealed surface ‘soil surface sealed with impervious materials as a result of urban development...’

U1c – Artificial unvegetated – unsealed surface ‘land that has no or very low (<10%) cover of vegetation through direct or indirect human activity, and the soil surface is not sealed with impervious materials’.

It is noted that a Biodiversity Gain Plan has been submitted. The final Biodiversity Gain Plan will need to be submitted at least 24 hours after planning permission is granted, if successful.

BNG Minimum Information Requirements

The [BNG planning practice guidance](#) states ‘Where an applicant believes the development would be subject to the biodiversity gain condition, the application must be accompanied by minimum information set out in [Article 7 of The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015...](#)

- ...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).’

Please provide a plan matching this requirement.

Application Form

The application form states that the application is not subject to the Biodiversity Gain Condition. It has been assumed that the applicant believes they are subject to the Biodiversity Gain Condition as they have submitted several documents relating to Biodiversity Net Gain.

Ancient Woodland and Reservoir

A data search was not carried out and the MAGIC map search was limited to SSSIs. Both the BNG Report and Slurry Store Justification documents consider the impacts on SSSI’s but not on Ancient woodlands which are an irreplaceable habitat that is sensitive to ammonia. The ‘Slurry Store Justification’ states ‘4 SSSI’s in the area have been identified and concluded that at this stage a SCAIL ammonia assessment is not require’. Greenway Wood, an ancient woodland is approximately 70m north and east of the site. Beyond this is Knypersley Reservoir. There are 5 other ancient woodlands within 2km of the site. The requirement for an ammonia / air assessment does not appear to have been considered for the Ancient Woodland. We would like to see an air assessment (including ammonia) such as SCAIL carried out to look at the impacts on nearby ancient woodlands and also Knypersley Reservoir as [per Woodland Trust Technical Advice Note 1 Assessing air pollution impacts on ancient woodland - ammonia](#). This should recommend any mitigation required.

Conditions

A condition should specify that the trees to be planted must be native and of local provenance.

The application is subject to the biodiversity gain condition and, as habitats being provided are of medium distinctiveness, these are significant on-site habitat enhancements that will need to be secured through a S106 or planning condition and subject to 30 years of management and monitoring.