The Black Swan in Idridgehay

AVA/2026/0109- 0110

Change of use application supplementary information relating to Biodiversity Net Gain

On submission of application, the LPA has queried the biodiversity net gain of the proposed development as follows:

2. **BNG**

Biodiversity Net Gain (BNG) is mandatory for new planning applications made under the Town and Country Planning Act (TCPA) 1990, subject to the confirmed exemptions.

It is noted on the application form that an exemption of 'development subject to de minimis exemption' has been selected. Part of the criteria for this exemption is the proposal must impact less than 25 sqm of habitat.

It is noted that the proposed extension, garage and permeable drive / turning area exceed 25 sqm, therefore, if these are to be built over existing habitat such as grassland, hedgerow units, trees etc, then the statutory biodiversity metric will be required. Please see the guidance below for the requirements –

https://www.gov.uk/guidance/biodiversity-net-gain#biodiversity-net-gain-submitting-a-planning-application

If the proposal will not impact more than the criteria outlined for the de minimis exemption below, please provide a supporting statement to confirm and justify this:

- *the development must not impact on any onsite priority habitat; and*
- *if there is an impact on other onsite habitat, that impact must be on less than 25 square metres (e.g. less than a 5m by 5m square) of onsite habitat with a biodiversity value greater than zero and on less than 5 metres of onsite linear habitat (such as a hedgerow)*

Photographs can also be included to support the justification, and existing and proposed habitat plans.

This is a reasonable enquiry within the statutory context. Within this development, the biodiversity net gain falls below the de-minimis requirements for the following reasons.

The existing development site “as existing” is not an existing habitat and the “as proposed” is a significant biodiversity net gain (BNG).

The proposed development of a garage, driveway and turning circle is entirely within the existing tarmacadam carpark. The subject area is illustrated below bounded in red. This area will be grubbed up and replaced with a permeable block paving solution on a SUDS base. The remaining area of existing carpark to be grubbed up and cleared away and reinstated with native species vegetation and soft landscaping



Illustration 1. Area in red to be replaced by permeable hard standing. Area in Green to be enhanced by grubbing up and returning to a enhanced biodiversity habitat



Illustration 2. The carpark with tarmacadam as existing