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## **BIODIVERSITY NET GAIN (BNG) EXEMPTION JUSTIFICATION STATEMENT**

**Proposed Erection of an Agricultural Equipment and Feed Storage  
Building with Associated Stables.**

**Land to the side of 19 Salley Street, Calderbrook, Littleborough.**

### **Biodiversity Net Gain (BNG) Exemption Justification Statement**

The proposed development comprises a single 15 m × 15 m (225 m<sup>2</sup>) agricultural and equestrian storage building located on a small parcel of improved grassland measuring approximately 0.124 ha. The works are confined to a compact footprint adjacent to existing rural buildings and managed hardstanding, with no encroachment into open countryside or areas of ecological sensitivity.

Under the Environment Act 2021 and the Biodiversity Gain (Town and Country Planning) (Exemptions) Regulations 2024, the mandatory requirement to deliver a minimum 10 % Biodiversity Net Gain (BNG) currently applies only to major development as defined in Article 2 of the Town and Country Planning (Development Management Procedure) (England) Order 2015—that is, development providing 1,000 m<sup>2</sup> or more of floorspace or on a site exceeding 1 ha.

This proposal clearly constitutes minor development and therefore falls outside the current statutory BNG requirement.

Even when the national BNG framework is extended to minor developments (anticipated in April 2025), the scheme would still not trigger a formal BNG assessment. The site area is modest, the works are low impact, and the development relates directly to existing agricultural and equestrian activity rather than introducing a new or intensified land use.

While the building's footprint exceeds the 25 m<sup>2</sup> threshold referenced in Schedule 7A paragraph 2(2)(a) of the Town and Country Planning Act 1990, that threshold applies only to very small-scale domestic or ancillary structures. The appropriate justification here is that the proposal does not constitute major development, involves no loss of priority habitat, and has negligible ecological impact consistent with the principle of proportionality embedded in national and local policy.

The site comprises improved, species-poor grassland and areas of compacted ground with no semi-natural or priority habitats. No trees, hedgerows, or water features will be affected. The development is for agricultural and equestrian purposes, a form of rural activity specifically recognised in NPPF 149(a) as appropriate within the Green Belt, provided it preserves openness and does not conflict with Green Belt purposes. Such uses are typically of negligible ecological impact when located on managed land of this nature.

In line with NPPF 188 and CIEEM Guidance (2021), ecological assessment effort should be proportionate to the scale and likely effects of a proposal. Rochdale MBC's Local Validation Checklist (2023) similarly confirms that BNG calculations are not required for small-scale rural proposals under 1 ha where no significant habitat loss is anticipated.

Nevertheless, to demonstrate the applicant's commitment to positive land stewardship and Core Strategy Policy G7 (Biodiversity and Geological Conservation), minor biodiversity enhancements can be incorporated as part of the scheme, including:

Planting of a short section of native hawthorn and blackthorn hedge along the western boundary; and

Installation of two bird nesting boxes on the new building's elevation.

These proportionate measures ensure that the development will maintain and modestly enhance local biodiversity, aligning with the Government's principle of "biodiversity gain by design" and Rochdale MBC's expectations for sustainable rural development. A full BNG metric assessment would therefore be disproportionate to the scale and negligible ecological impact of the proposal.