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**RECEIVED**

By Tom.Anderton at 5:57 pm, Apr 03, 2025



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**BY EMAIL ONLY**

Dear Liv,

**Planning consultation:** P/25/010/COU Temporary change of use from field to Class C3 (Dwellings) for 24 portable single sleeper units for a period of up to 6 months for contractors (Integrated Health and Social facility project).

**Location:** Land to the North of Ennor Farm, Old Town Lane, Old Town, St Mary's, Isles Of Scilly.

Thank you for your consultation on the above application.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**SUMMARY OF NATURAL ENGLAND'S ADVICE**

**FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES**

As submitted, the application could damage or destroy the features for which the Lower Moors (St Mary's) SSSI (Site of Special Scientific Interest) has been notified. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

- Information on potential pollution prevention measures

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

The proposed works are located adjacent to the Lower Moors (St Mary's) SSSI. Further information on this site can be found via Natural England's Designated Sites System (DSS)<sup>1</sup>.

### **Wildlife and Countryside Act 1981**

This SSSI supports a range of wetland plant communities including pools, reedbed, acidic marshy grassland, tall herbs and Willow carr with features here being assessed as is in unfavourable condition. Water quality is crucial for wetland plant communities because it directly impacts their growth, survival, and ecological balance and the diversity of habitat also provides feeding and roosting grounds for a variety of breeding and migrating birds.

The current proposal includes the use of a geotextile membrane with compacted aggregate for the path and parking area, which appears to be impermeable. This design seems to direct runoff towards a portion of the field adjacent to the SSSI. Based on the map contours, it appears that the SSSI lies downslope, creating a potential pathway for impact. Consequently, additional information is needed regarding the potential for a pollution impact and options for mitigation.

While it is not Natural England's role to design potential mitigation measures, we strive to provide constructive support wherever possible. As a suggestion (rather than a directive), there are various surface options available for temporary field car parks that could help prevent pollution and better protect the environment and the features of the SSSI, which might serve as an alternative to the proposed surface and provide effective mitigation.

### **Further Advice**

#### **Protected Species**

Natural England has produced [Protected species and development: advice for local planning authorities \(gov.uk\)](#) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply \(www.gov.uk\)](#) for more information.

#### **Biodiversity and wider environmental gains**

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](#) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is also applied extended to small scale development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

[Biodiversity Net Gain](#) guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the [Biodiversity Net Gain Planning Practice Guidance](#) (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric](#) for more information. For small development sites, [The Small Sites Metric](#) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

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<sup>1</sup> Natural England's Designated Sites System - <https://designatedsites.naturalengland.org.uk/>

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](#)

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

Natural environment - GOV.UK ([www.gov.uk](http://www.gov.uk)) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Please consult us at [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) once the revised information is available.

Yours sincerely,

Gareth Townsend

Higher Officer  
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Natural England