

Dear Rebecca Bowers

SMD/2024/-188

Holiday Lodges Supplementing Existing Holiday Accommodation

The Green Man, Ashbourne Road, Bottomhouse, Leek ST13 7QJ

2.60 hectares

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.

We have viewed the following documents:

- Update Ecological Appraisal v2 dated April 2024
- The Biodiversity Net Gain (BNG) Statement (undated)
- Small Sites Metric (The Statutory Biodiversity Metric) Calculator tool dated April 2024
- Biodiversity Enhancement Proposals dated April 2024

SUMMARY – a **Holding objection** to the proposals is recommended due to a request for further information/amendments to ensure any potential impacts on ecological features are adequately assessed and to support BNG. In summary, the information amendments required are:

1. A review of designated sites and priority habitats.
2. Clarifications on baseline habitat survey date and mapping.
3. Amendments/corrections to BNG metric.
4. Additional information in relation to protected species.

Conditions are also recommended for other ecology items.

DESIGNATED WILDLIFE SITES

The Updated Ecological Appraisal does not include any reference to a review of the presence of designated wildlife sites or Priority Habitats on or local to the site. This information should be provided.

HABITATS

An Updated Ecological Appraisal has been submitted dated April 2024. The report has been prepared by a suitably qualified ecologist. It is unclear if the 'update appraisal' included a site survey of the habitats and if not when the habitat survey was undertaken. The date of the habitat survey should be clarified to ensure the information is up-to-date and suitable for planning purposes.

The habitats that will be impacted by the development are described as a mix of 'rank' grassland with an increasing rushy character, bramble scrub and tall ruderal habitat. Some areas of grassland will be enhanced by seeding with 'wild flowers' as shown on the Biodiversity Enhancement Plan (dated April 2024). Areas of habitats of higher value comprising woodland, scrub and trees will be retained, which is welcomed. However, the woodland area is not clearly demarcated on the Biodiversity Plan and a boundary around this habitat should be included.

New tree planting is proposed and is predominantly native, which is welcomed, however (a minor point) the scientific name of Field Maple is incorrect on the Biodiversity Enhancement plan and Proposed Site Plan and should be corrected for clarity.

The detail of proposed species, seed mixes, soil preparation, seeding/planting and aftercare should be secured via planning condition.

The way in which retained habitats and trees will be protected during construction should be secured via planning condition.

BIODIVERSITY NET GAIN

A BNG metric version has been provided using the Small Sites Metric (SSM). This version is acceptable as the application meets the criteria for use of the SSM. The name of assessor and date of assessment are provided. There are no Irreplaceable Habitats recorded on site and no 'red boxes' flagging errors. There are no watercourses on or near to the site. Photographs are included which are helpful. However, there are omissions and inconsistencies in the BNG metric which should be updated and re-submitted as follows:

- The planning application reference does not match the application.
- Desktop Assessment - Information sources are missing for the assessment of designated sites and priority habitats.
- Baseline habitats – the areas of grassland retained, existing 'developed land, sealed surface' and existing woodland are not clearly presented on any map or plan. The relevant plans/map should clearly and consistently present the on-site pre-development habitat types, locations and areas (m2) as specified in the metric.
- Post-development habitats – the 'other woodland' proposed to be created (762m2) is not clearly demarcated on any plans/maps provided. In addition, the justification for classification of this new habitat as woodland as opposed to classifying this as tree planting within the existing grassland habitat is not presented. A clearer distinction should be made between proposed woodland habitat creation and individual newly planted trees, and each element appropriately dealt with in the BNG metric. Further information is required on these aspects.
- There is no evidence to support the classification of existing or proposed trees into the various size categories. In particular, the Updated Ecological Appraisal does not mention medium or large sized trees, however, these size categories are included in the BNG. Further information/clarification should be provided.
- A 'gappy hedgerow' is noted as being present on site in the Updated Ecological Appraisal but is not included in the BNG metric. Further information/clarification should be provided.
- The proposed driveway ('free-draining aggregate') and parking spaces (surface type not specified) does not appear to be accounted for in the BNG metric. Clarification is required.
- The proposed sitting areas and pathways ('free draining aggregate') do not appear to be accounted for in the BNG metric. Clarification is required.
- It is not clear, particularly without any detailed seed mix specification, if/how the proposed uplift from modified grassland to 'other neutral grassland' in Good condition will be achievable and sustainable over the long-term. Further information is required.

SPECIES

The Updated Ecological Appraisal report assessed the site for presence of/potential for nesting birds and bats.

The assessment does not include a review of the potential for/impacts on other notable fauna, such as hedgehog, amphibians or reptiles. This should be included.

Potential for nesting birds is noted within the assessment and a suitable approach to avoiding harm to these protected species is provided and to be welcomed. The measures should take account of potential for ground nesting birds as well as those that nest in trees, shrubs, scrub, etc. The precautionary working measures for nesting birds, including ground nesting species, can be secured by condition.

No bat roost potential has been identified in the trees or buildings across the site and no further surveys are recommended for bats. However, the assessment does not appear to use the most current version of guidance in relation to professional bats surveys (which is Collins 2023¹). The bat survey methodology and evaluation approach should be re-evaluated and brought in line with this latest guidance.

Similarly, if trees of a Moderate or Large classification are present on site (as referred to in the BNG assessment) then the potential for bat roost features in these larger trees should be clarified and the Updated Ecological Appraisal amended to include reference to these larger trees and evaluation with reference to Collins (2023). The BNG statement also includes reference to 'mature' trees which further underlines the need for clarification.

Regards,

Dated 27 June 2024

¹ Collins, J. (ed.), 2023. *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*. The Bat Conservation Trust.