

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.

In summary, amended drawings are attached, two showing the Biodiversity area surveys and revised site layout plus the BNG Metric calculation for the holiday lodge site, and likewise for the Manager's lodge site, making four drawings and two BNG calculation sheets in total. The ecologist's report has also been updated to provide the additional information requested.

This has been added to the report and the Defra 'Magic' map screen captured and added to the Biodiversity survey drawing.

The update appraisal of 5th April was the site visit and survey, and this date was confirmed in the BNG Metric Calculation

All existing trees and shrubs will be retained, and on the BNG survey drawing the advice from Staffordshire Wildlife Trust has been adopted, thank you. The existing trees are in line in some parts of the site with outlying individual trees and clumps which made it hard to decide whether they should be assessed as tree lines or areas of woodland as proposed in the first BNG calculation. So now trees are calculated as lines of trees in the calculation, and not woodland. However, in the proposed site layout such a large number (75 new) and area of trees is proposed that the depth of the belt is substantial and the area of trees is then calculated as woodland for the BNG calculation, and shaded and outlined accordingly.

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.

The Field Maple scientific name has been adjusted to *Acer campestre*.

Agreed

Agreed

Revised

Added

Revised to show the areas in dotted coloured lines and individual areas and calculated summations added.

A continuous belt of trees is added to the south-east of the site, and the number of trees provided plus the depth of the belt in conjunction with the existing trees on site changes the character of this to effectively become woodland. This area of woodland is now shaded and outlined for clarity. In total 75 new trees are added as either part of the woodland belt or reinforcing to existing tree lines, and the 73 trees already on site.

The trees were not measured at breast height in the earlier survey and this has now been rectified in the metric calculation, so the sizes are generally now identified as small in the metric, with a few medium. The proposed trees are now all designated as small in size so the numbers in the calculation have been increased to compensate.

The existing trees on site are now noted as being 'lines of trees' on the metric calculation, and lengths shown on the biodiversity survey plan.

In the earlier Feb metric calculation, the introduction of the unsealed surfaces kept appearing as red in the calculation and disallowed. In the latest July revision from the government website which has been used in the revision this has been introduced successfully and entered into the calculation, with the areas shown on the proposed site plan for the drives, sitting areas and paths.

The grassland around the lodges will be maintained and managed for the benefit of visitors. Much of it is on the land which was sparsely vegetated due to wheel compaction from vehicles over the years, and these will be confined to the proposed gravel driveways in future, allowing the grass around to be uplifted, managed and cared for effectively. The detailed seed mix could be agreed via condition?

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

The ecologist has reviewed the Ecological Appraisal and confirmed his findings re other protected species.

Agreed

The ecologist has re-evaluated the methodology and updated his report to bring it into line with the latest guidance.

As stated earlier in these notes, the existing trees have been re-assessed downwards in their sizes and this has been reflected in the revised BNG metric calculation and revised ecologist’s assessment. The proposed trees are now all shown as small although as they grow they will move into the larger categories. It was assumed that this is how this was assessed in the original BNG calculation submitted as it is difficult to imagine new trees of in excess 600mm diameter being moved to the site. So all new introduced trees will be classified as ‘small’ in the metric.

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