

Dear Chris Johnston

SMD/2024/0529

Erection of replacement dwelling

Apesford Farm, Apesford Lane, Bradnop, Staffordshire , ST13 7EX

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:

- BNG Assessment, Haslam Ecology, December 2024
- BNG Metric, Haslam Ecology, December 2024
- Proposed Site Plan, Architectural Design Limited, dated March 2024
- Bat Survey Report - Etive Ecology, November 2023

SUMMARY – Having reviewed the information provided we have a **holding objection** further information required.

1. Clarifications/revisions to BNG Metric and Assessment

Secure via condition should approval be granted:

1. Details of proposed planting scheme
2. Details/specification for species enhancement measures i.e. bird and bat boxes.
3. Sensitive lighting scheme

BNG ASSESSMENT

We have reviewed the BNG Assessment and accompanying Small Sites Metric prepared by Haslam Ecology, December 2024. We concur that it is appropriate to use the Small Sites Metric in this case due to the small footprint of the proposed development.

There appears to be an error in the BNG metric which require further clarification. The baseline section of the BNG metric suggests that the existing yard (1160m²) and buildings (175m²) would be retained, and the only habitat loss would be 65m² of modified grassland.

Under habitats to be created it is stated that a new farmhouse (175m²) and access track (1225m²) would be created. This appears to have resulted in an 'error' with the extent of habitat creation not equal to the area of habitat lost. Clarification and/or corrections are required to address this apparent inconsistency.

The above amendments may result in change to the overall BNG score. We request that an updated metric is submitted for review, and we may wish to make further comments in due course.

PLANTING SCHEME

We note it is intended to plant three rowan trees to provide the necessary 10% BNG uplift. Subject to the outcome of the revised BNG metric (as per our comments above) it may be necessary to provide additional planting to achieve 10% net gain.

Notwithstanding, we recommend the detail of the proposed planting scheme is secured by planning condition to confirm the location, species, ground preparation, aftercare and management to deliver the stated BNG.

BIRD AND BAT BOX ENHANCEMENTS

We note and welcome the recommendation in the bat survey report for the installation of four artificial bat roost features and note these will be detailed in the Natural England bat licence. In addition, we note and welcome the recommendation for artificial nest boxes for swift and house sparrow to be installed, although it is not clear from the bat survey report where these would be located. We would wish to see a minimum of four of each type of box installed, and this can be across the wider site if necessary. We recommend a planning condition to secure the location, number and specification of bat roost features and bird boxes.

SENSITIVE LIGHTING SCHEME

We note the site currently provides a dark rural environment after dusk, with no permanent artificial lighting in operation and would therefore support the inclusion of a sensitively designed lighting scheme as detailed in the Bat Survey Report (Etive Ecology 2023) to minimise disturbance to bats and other wildlife including barn owl which is reported to be using the adjoining farmhouse as a roost/feeding perch. This can be secured by planning condition.

BAT SURVEY AND BAT LICENCE

We have reviewed the Bat Survey Report (Etive Ecology, November 2023). The bat survey was conducted by suitably experienced ecologists at an appropriate time of year during suitable weather conditions. We agree with the conclusion The existing farmhouse/Shippon was assessed to be of High Bat Roost Potential. We note that during the first dusk survey, 2 x common pipistrelles were seen entering the northern gable of the Shippon and 1 x Myotis bat was seen emerging from the eastern gable of the farmhouse and agree with the conclusion that both roosts are summer roosts for a small number of male bats. In addition, we note that foraging activity was recorded in vegetation east of the farmhouse, primarily common pipistrelle and brown long eared bats.

Although the survey data is from the 2023 survey season, it is unlikely that update survey in 2024 would substantially alter the findings, and the results are therefore considered sufficiently up to date to support this planning application.

As confirmed in the bat survey report a licence will be required from Natural England. We recommend inclusion of an informative to obtain a bat licence from Natural England prior to works commencing.

Regards,

Dated 12 December 2024