Parcel of Grassland of Caverswall Road SWT Comments

Application Reference: SMD/2024/0233
Location: PARCEL OF GRASSLAND OFF Caverswall Road, Dilhorne
Proposed Development: Change of use of land for equestrian purposes and erection of stables

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.

Staffordshire Wildlife Trust recommends a **holding objection** on this application until the comments below have been addressed and further suitable information relating to bats and BNG is made available and assessed:

- Bat surveys have not been carried out to assess the impact of the development on bats. There are large trees near to the development, it is immediately adjacent to a hedge and there is a woodland on the opposite side of the field. These are all features used by bats. In the absence of bat surveys at an appropriate time of year, a precautionary approach should be applied in relation to bats. A Ground Level Tree Assessment (GLTA) should be carried out by an appropriately licenced Ecologist to assess the likely impact of the development on bats. A report should be produced that should detail any mitigation needed. This should then inform a sensitive lighting plan designed for bats both during and post construction should be provided and approved prior to construction. We would recommend utilising Bat Conservation Trust's Guidance on Bats and Artificial Lighting at Night. The citing of the stable block may need to be amended to ensure that there are no negative impacts on bats that may be using the site. Negative impacts include illumination of any potential roost entrances, habitats and features that may be used by bats.

The mitigation and sensitive lighting plan should be secured by appropriate planning conditions.

In addition, we have the following comments in relation to BNG:

- The Defra metric calculator 4.0 has been used to calculate BNG. Guidance states that the statutory metric should be used to calculate BNG assessments. The BNG calculations need to be done on the statutory biodiversity metric calculation tool that was published on 12th February 2024.
- The application form states that the development is not subject to the biodiversity gain condition as the development is subject to the de minimis exemption as it is less than 625 square metres. This is incorrect, the de minimis exemption applies for developments that are 'less than 25 square metres of onsite habitat that has biodiversity value(1) greater than zero'. The measurements on the proposed layout show that the fodder store, wash room and four loose boxes are 12ft x 56ft and this accounts for less than a quarter of the proposed site plan. The application form needs to be amended.

- The habitat map needs to have a north arrow.
- The proposed enhancements to habitat are significant. Evidence will need to be provided to show that the grassland can meet the target of other neutral grassland in moderate condition and it will be subject to a 30-year management and monitoring plan to demonstrate this. This is not required prior to planning permission being granted, but it is a pre-commencement condition that needs to be fulfilled before development can commence and the applicant should be aware of this.

We may wish to provide further comments upon receipt of the requested information.