

Little Gorsty Hill Farm Tenford Lane SWT Comments

Application Reference: SMD/2024/0563

Location: Little Gorsty Hill Farm Tenford Lane

Proposed Development: Existing farm-house will be completely refurbished and the low quality outbuildings will be demolished to provide 3 x new build properties.

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.

Summary: We recommend a **holding objection** until the following information is supplied and our further comments are resolved:

- Preliminary Ecological Appraisal required.
- Redraw the red line boundary to include all habitat that are being lost in the blue line boundary due to the development. Update the BNG report and the Statutory Biodiversity Metric Calculation tool accordingly.

Further comments on specific documents or sections of documents associated with the application.

Application Form

The application form stated that there are 1.51 units. This is the score from the baseline area habitats but does not contain the linear habitats which have 0.92 units; therefore the total is 2.43 units.

Preliminary Ecological Appraisal (PEA)

The BNG report states '*The habitats on site have the potential to support a number of protected species*' and '*No preliminary ecological appraisal survey has been undertaken. As such, the potential to support protected or rare species has not been undertaken*'. To fully assess the BNG implications of the proposed development we require a PEA or Ecological statement to be completed by a suitably qualified and experienced Ecologist. This will carry out a data search, site visit and assess any impacts on ecology, biodiversity or protected species. It should include GLTAs for bats. It should be presented in full in an ecology report or statement referencing methodologies used, etc and proposing any further surveys, suitable mitigation and compensation measures as required. This would also ensure that the mitigation hierarchy is followed.

BNG Report

We have further comments on individual sections of the BNG Report that need addressing:

3.1 Habitats

Please could further detail be given explaining why the grasslands were assigned the 'modified grassland' habitat type rather than 'other neutral grassland', given that both scored highly in the condition assessments.

5.3 Habitat Mitigation Score

Please check the 'on-site post development units no enhancements' '% Net Gain' for 'Linear habitats – hedgerows or lines of trees'; in the report it states this is -92.17 whereas the headline results for the metric state -84.78%. Please check the 'Post-development units with recommendations' '% Net Gain' for 'Linear habitats – hedgerows or lines of trees'; in the report it states this is +53.92, whereas the metric states this is 53.92%.

3.3 Strategic Significance

Checking strategic significance using the maps on <https://netgainstaffs.com/map>. A very small amount of the land within the blue line boundary is a semi-strategic area for woodland.

Total Net Unit Change

Section 5.3 - 'Red Line Boundary Net Unit Change' and 'Total Net Unit Change' - the linear habitats in the red line boundary change and on-site net change unit and percentage loss are different in the report and metric. Please correct the incorrect document or explain the reason for the difference.

Under the 'Blue Line Boundary Net Unit Change' heading it states that there is to be a loss of linear habitats within the blue line boundary, in the sentence, these are described as 'on-site', it appears that this may be a typo as this section is for off-site habitats. The loss of on-site habitats is listed in the section above under 'Red Line Boundary Net Unit Change'. The metric also states that native hedgerows are to be lost off-site. If off-site habitats are lost due to the development then they should be included in the red line boundary.

Recommendations

6.1 As stated elsewhere in these comments, the figures in the report and metric differ for linear habitats, please correct as necessary.

The timetable for monitoring will be agreed in the S106 agreement or conservation covenant.

6.2 The report states ‘...*the off-site habitat biodiversity value is calculated at **11.85** habitat units, with **2.28** units lost during the development*’. If habitats are lost in the blue line boundary due to the development, the red line boundary should be redrawn to include all areas impacted by the development. This report and the Statutory Biodiversity Metric Calculation tool will need updating to reflect the changes.

6.3 Enhancement of gorse scrub through planting gorse saplings – allow natural regeneration and monitoring after perhaps 5 years (depending upon monitoring schedule) with supplementary planting of native stock with local provenance if needed.

Off-Site (Blue line boundary) BNG

Any off-site (blue line boundary) BNG delivery would need to be [registered as a Biodiversity Gain Site](#) with Natural England and secured for 30 years through a legal agreement – either S106 with the LPA or conservation covenant with a responsible body. This would be subject to a Habitat Management and Monitoring Plan (HMMP) which would need to be in place prior to registration.

Additionally, any significant on-site BNG delivery would be secured through a S106 with the LPA; currently the post development plans for the red line boundary do not include any significant habitats.

The applicant may wish to consider whether it would be better for them to extend the red line boundary to include any off-site biodiversity gain delivery as on-site BNG delivery. If this is extended and includes significant habitats then a Biodiversity Gain Plan and HMMP will need to be submitted after permission has been granted as part of the pre-commencement Biodiversity Gain Condition. Regardless of whether the red line boundary is altered, the pre-commencement Biodiversity Gain Condition requires a Biodiversity Gain Plan to be submitted after planning approval. The Biodiversity Gain Plan will need to demonstrate application of the Biodiversity Gain Hierarchy. There is further guidance and information including report templates for [Biodiversity Gain Plans](#) and [HMMPs](#) available from the gov.uk website and more information is provided in the [BNG planning practice guidance](#).

Habitat Creation and Management

Management recommendations should be detailed so that the person creating or managing the habitat can follow them. Ensure any description of habitat works in accordance with British Standards that are not freely available are fully explained so that people without access to the British Standards can follow them.

7.1 Soil preparation. Wildflower areas – suggest low nutrient soil or subsoil rather than topsoil to keep the soil as nutrient poor as possible. No compost should be added to wildflower areas.

7.2.1 We would recommend using local provenance heritage varieties of fruit trees in the orchard. As a minimum all trees should be native and of local provenance.

Traditional Orchards will require more detail on management in the HMMP e.g. ground preparation, tree guards, weeding; Natural England Technical Information Note TIN14 on traditional orchards: planting and establishing fruit trees states ‘Good tree management and aftercare in the first few years after planting is crucial to ensure their survival and long term health’ (<https://publications.naturalengland.org.uk/file/81049>). Therefore we would not recommend that ‘trees are left to mature’ without any management then pruned as stated in the Net Gain Report.

7.2.2 Wildflower meadow. All seeds should be native and preferably of local provenance. This could be purchased seed mixes or collection / green hay from a suitable local donor site. The cut should be between mid-July and September with all cuttings removed off-site or placed in a designated area. If areas are left long, they should be cut on at least a three-year rotation to avoid succession, coarse grasses, plants such as dock and nettle that thrive in more nutrient enriched areas and scrub appearing.

7.2.3. Ensure that ‘*Mixed scrub is to be planted in accordance with BS 3936 and handled in accordance with NPS ‘Handling & Establishment’ guidelines and planted in accordance with BS 4428:1989*’ is expanded upon so that people without access to the British Standards understand what is required.

If possible natural regeneration or transplanting from unwanted or excess scrub within the site should be encouraged before buying in scrub. If scrub is bought in, it should be native and of local provenance. Scrub should be left to grow for five years then monitored and managed every 5 years to ensure that it is covering the desired area. If areas are cut, this should be done on a rotational basis every 5 years.

7.2.4 Hedge species should be native and of local provenance, species should be selected depending on local conditions e.g. soil pH, whether soil is free draining etc. [Advice on planting hedges can be found on hedgelink](#), this details everything that needs considering including planting density. Hedges are usually cut on a two or three year rotation – preferably three. A cut every five years seems like a long time between cuts and this should be reviewed. Further information on hedgerow management including types of machine used to trim hedges is available here:

[Hedgelink hedgerow management advice](#)

[Hedgelink hedgerow cutting advice](#)

The links provided should be used to inform the HMMP.

7.2.5 When considering the HMMP, the Freshwater Habitats Trust has produced good guides on [pond creation](#) and [pond management](#).

7.2.6 Control of aggressive weeds – the management should include removal of aggressive weeds as well as plant ID survey. Perhaps worded ‘any aggressive or invasive weeds will be identified and removed by hand’. It is unclear why March is one of the times suggested to do carry out an ID survey for aggressive weeds – further clarification required. We would recommend identifying and removing aggressive weeds just once a year in May.

Timing phasing and Duration of Conservation Measures

Planting of wildflower seeds is usually done in Autumn or Spring following appropriate ground preparation. Timing should be as per seed company instructions.

Planting of trees / scrub / hedgerows to be ideally between the end of November and end of March, avoiding hard frosts, droughts or particularly cold, windy periods.

Pond – would recommend this is left to colonise naturally, planting should only be required if plants have not become established after a number of years. Freshwater Habitat Trust advice states ‘*Within two or three years after a clean water pond is made, it can be as rich as a 50 year old pond – entirely by natural colonisation*’

Wildflowers – sow Autumn or Spring. Cut between mid-July and end of September.

New Scrub – Would recommend monitoring after 5 years, not 15. Would recommend sections are monitored and cut on rotation every 5 to 6 years, not every 9 years.

Hedgerows – please refer to Hedgelink advice link above.

Orchard - please refer to ‘Natural England Technical Information Note TIN14 on traditional orchards: planting and establishing fruit trees’ or another trusted Orchard authority, do not leave pruning until year 28.

Controlling aggressive weeds - the management should include removal of aggressive weeds as well as plant ID survey. Perhaps worded ‘any aggressive or invasive weeds will be identified and removed by hand’. We would recommend just once a year in May.

The monitoring schedule should be as agreed in the S106, planning condition or conservation covenant.

Appendix B1 – On Site Habitat Conditions

The condition assessment for mixed scrub indicates that ‘there is an absence of non-native plant species (as listed on Schedule 9 of WCA and species of sub-optimal condition make up less than 5% of ground cover’ criteria is not met. No further

explanation is given. Please could clarification be provided as to whether a plan is required to control and prevent the spread of a species listed on Schedule 9 of WCA into the wild.

Appendix D and Appendix E

The symbols on the key for retained modified grassland and new vegetated garden appear the same. Please distinguish between them.

Potential Planning Conditions

The BNG report has made several suggestions regarding protected species mitigation in section 7.3, these are listed below. It should be noted that these requirements may change after the receipt of a PEA, but any recommendations or reasonable avoidance measures for protected species during and after construction should be secured with planning conditions.

- Three amphibian hibernacula
- Five bat boxes. Citing and type to be specified as a pre-commencement condition.
- Sensitive nocturnal lighting plan to be prepared in accordance with and signed off by an appropriately qualified Ecologist
- At least four bird boxes, type, number and citing to be agreed as a pre-commencement condition.
- Four eco hedgehog nest boxes citing to be agreed as a pre-commencement condition.
- Two bug hotels and two bee boxes type and citing to be agreed as a pre-commencement condition.
- Three reptile hibernacula and designated grass cuttings area for reptiles.