

Land To the North Of Hawes Farm High Street Ipstones

SWT Comments

Application Reference: SMD/2025/0022

Location: Land To The North Of Hawes Farm High Street, Ipstones

Proposed Development: Erection of two detached dwellings

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:

- Biodiversity Net Gain Supplementary Note. Land off High Street, Ipstones, Staffordshire.
Date of publication: 25th September 2024.
Report Reference: HE 2200524
Haslam Ecology, Wolverhampton
- Small Sites Metric (the statutory biodiversity metric) completed by Mr D. Haslam on 25th September, 2024.

Staffordshire Wildlife Trust recommend a **holding objection** until the further information detailed below is supplied and correct and has been assessed:

- Updated Biodiversity Metric Calculation tool – this may need to be the Statutory Biodiversity Metric Calculation Tool rather than the Small Sites Biodiversity Metric Calculation Tool depending upon option taken for protected species.
- The on-site area habitats to be created are to be part of a private garden and should be input into the metric as ‘urban-private gardens’ as per the metric user guide, not modified grassland or other neutral grassland. Trees should be removed from the habitat creation section – the metric user guide states ‘*You should not:...count newly planted trees sited within private gardens*’
- The area of habitat created (1712m²) does not match the area of habitat lost (1740m²). This needs to be corrected so that they match.
- Clarification sought about whether the boundary features are within the red line boundary; if so, the metric and BNG supplementary note will need to be updated accordingly.
- The date that the biodiversity metric used was published is incorrect on the application form and this needs to be corrected or the publication date supplied elsewhere as per the [minimum information requirements for BNG](#).

- Demonstration of consideration and application of the mitigation hierarchy to comply with the NPPF (2024) and BS 42020:2013.
- There does not appear to have been consideration of protected species.
- Either a PEA needs to be carried out assessing the site and neighbouring land for negative impacts on protected species focussing largely on bats and breeding birds or a precautionary approach taken with a completed Statutory Biodiversity Metric Calculation Tool supplied and providing the following measures:
 - Retention of the hedge and possibly and planting a parallel hedge to act as the curtilage of the new properties.
 - Tree root protection zone for construction.
 - Ecologically sensitive lighting plan for external nocturnal lighting both during and post construction.
 - 2x integrated bat boxes per house – 4x in total.
 - 2 x bird nest boxes on each house (1 x house sparrow and 1 x generic).
 - Hedgehog precautionary measures for site clearance and demonstration of retaining ‘hedgehog highway’ features in landscape design.
 - Reasonable avoidance measures to avoid entrapment of mammals or amphibians during construction.
 - Measures put in place to avoid the bird breeding season, any vegetation clearance should be done outside the main bird breeding season. If this cannot be done, then a suitably qualified Ecologist should survey all areas for active nests prior to vegetation removal. Any identified active nests must be protected until the chicks have fledged and the nest is no longer in use.

Further detail on some of the points above:

BNG Metric Comments

Boundaries

The BNG supplementary note states ‘The boundaries are a mixture of the original dry stone walls with garden boundary hedgerows of hawthorn (western boundary), and cherry laurel, honeysuckle and holly in the south western corner. There is a wooden panel fence along the eastern boundary which joins a managed leylandii hedgerow.’ It later states ‘*The boundaries are to be retained, except for the new access onto the High Street which will involve the removal of approximately 3m of dry stone wall. To compensate for this loss, two new walls will be constructed (indicated on site*

plan) and the access will have new walls along the drive edges. This will provide 36m of new dry stone walls'. This suggests that the boundaries are within the red line boundary. These boundary features are not included in the BNG metric calculation. Clarification is sought as to whether they are in the red line boundary. Anything within the red line boundary should be included in the BNG calculation. [Planning portal guidance on red line boundaries](#) states 'Your red line boundary should include the entire site, i.e., land required for access to the site, car parking, gardens, and other outbuildings around the site, such as garages'. Therefore, if the boundary features are to form part of the gardens, they should be included within the red line boundary and the BNG calculation. If the boundary features are within the red line boundary, they will be subject to the net gain condition. Metrics including these will need to be submitted and demonstration of 10% gain in biodiversity units. The BNG supplementary note will also need to be updated.

Private Gardens

The Small Sites Metric (Statutory Biodiversity Metric) User Guide states:

'Private Gardens

A private garden is a garden within the curtilage of a privately owned or tenanted dwelling house. Private gardens can contain important features for biodiversity, including mature trees and hedgerows.

When recording habitats at baseline within a private garden you may need to assess any important features as individual habitat parcels to avoid under-recording biodiversity.

This may include:

recording individual trees

recording hedgerows

recording other habitats, such as ponds

See more about which individual trees to record at baseline within private gardens.

The post-development private garden has no public access, and biodiversity net gains cannot be legally secured. As these gains cannot be secured you should only record created private gardens as either:

'urban – vegetated garden'; or

'urban - unvegetated garden'

You should not:

record the creation of any other new habitats within private gardens

record enhancement of any habitat within private gardens

Habitats which are recorded in the baseline and remain within a private garden may be recorded as retained.'

The modified grassland and other neutral grassland to be created are part of a private garden so need to be inputted into the metric as 'urban – vegetated garden'. The planted trees cannot be input as habitats created in private gardens.

This land holding is not listed as strategic or semi-strategic on [net gain staffs](#). The site is mapped in the habitat layers for pasture, therefore development of this land would lose the potential for it to be used as pasture.

Protected Species

There has been no assessment or consideration of the impact on the proposed development on protected species.

A data search that we carried out has revealed bat records including a maternity roost within 500m of the proposed development and the development is adjacent to a listed building and a mature tree with a TPO. In addition, the hedgerows could be used for commuting and the pasture as a foraging habitat. Therefore, we would recommend either a PEA is carried out or precautionary measures for protected species put in place. The PEA should include a desk review, site survey, and assessment of adjacent features of interest in particular for bats – this would include the mature tree (and any other adjacent trees), listed building/possible maternity roost. This would recommend any suitable mitigation and further surveys. If further surveys are required, these should also be carried out. Surveys would need to be done by a licenced bat worker and at the correct time of year. If European protected species were found then the Statutory Biodiversity Metric Calculation Tool should be submitted in place of the Small Sites Biodiversity Metric Calculation Tool.

If a precautionary approach is taken, the Statutory Biodiversity Metric Calculation Tool should be submitted in place of the Small Sites Biodiversity Metric Calculation Tool and the following should be secured by planning conditions:

- Retention of the hedge and, if this cannot be secured into the future, planting a parallel hedge to act as the curtilage of the new properties (allowing the existing hedge to be an ecological feature that can be retained for commuting/foraging bats and nesting birds and provides some buffer around the development).
- Tree root protection zone for construction – this would be a pre-commencement condition.
- Ecologically sensitive lighting plan for external nocturnal lighting both during and post construction – this would be a pre-commencement condition.
- 2x integrated bat boxes per house – 4x in total.
- 2 x bird nest boxes on each house (1 x house sparrow and 1 x generic) – citing to be agreed as a pre-commencement condition.

- Hedgehog precautionary measures for site clearance and demonstration of retaining 'hedgehog highway' features in landscape design – depending on scheme details, this might be the retention of the existing hedgerow.
- Reasonable avoidance measures to avoid entrapment of mammals or amphibians during construction.
- Measures put in place to avoid the bird breeding season, any vegetation clearance should be done outside the main bird breeding season, between early October and the end of February. If this cannot be done, then a suitably qualified Ecologist should survey all areas for active nests prior to vegetation removal, preferably immediately prior to, and no more than 48 hours before removal. Any identified active nests must be protected until the chicks have fledged and the nest is no longer in use, using a suitable buffer, marked with barriers where necessary. If a suspected active nest is discovered by contractors, an ecologist should be contacted for further advice before clearance can continue in the vicinity of the nest.