

Apesford Farm SWT Further Comments

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 Report, Hewitt & Carr Services 06/02/25
- BNG Metric, completed by Thomas Egerton Ecologist 06/02/25
- Planning Statement, Rob Duncan Planning consultancy

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

1. Any private gardens (meeting the definition below) pre and post development should be classified as ‘urban-vegetated garden’ or ‘urban unvegetated garden’ in the SSM. This will need to be revised. The BNG report will need updating to show how a 10% net gain in biodiversity units can be achieved.

Further Clarification

The BNG metric is filled out for an application that *‘proposes the demolition of the existing farmhouse, with the existing shippon to be retained. A replacement dwelling will be constructed to the south of the existing farmhouse, in an area currently occupied by an otherwise redundant and somewhat dilapidated former agricultural building.’*. The latest version of the BNG metric guidance has new guidance on filling out the metric for private gardens. This states:

‘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.’