

Somerdale Farm Lodge Barn Road SWT Comments

Application Reference: SMD/2024/0419

Location: Somerdale Farm Lodge Barn Road

Proposed Development: (copy from planning portal)

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.

Documents Viewed:

- Application form
- Planning, & Design & Access Statement, Sammons Architectural Limited, September 2024
- Biodiversity Net Gain Assessment, Somerdale Farm, Peak Ecology limited, 05/12/2024
- Existing Conditions, Plan and Elevations, Sammons Architectural Limited, September 2024
- Planning Proposal, Plan and Elevations, Sammons Architectural Limited, September 2024

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

- Carry out a Preliminary Ecological Appraisal or Preliminary Roost Assessment looking specifically at bats and birds
- Supply correct date of publication of the version of the metric used.
- Change strategic significance in metric for grasslands
- Clarification on reasoning for grassland type using precautionary approach
- Metric needs to be updated to account for habitat degradation

Further detail

Preliminary Ecological Appraisal / Preliminary Roost Assessment

The building attached to the barn being demolished has a tiled roof and a stone construction. Therefore, it may have the potential to support roosting bats. Therefore, this needs to be assessed for its potential to support roosting bats by a suitably qualified Ecologist and any further recommended surveys completed; these should be following methodology in Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). In addition, the barn to be demolished and the attached building being retained have not been assessed for their potential to support

breeding birds and this should be done at the same time as the bat roost assessment, including but not limited to Barn Owl and Barn Swallows. Depending upon results of the surveys, a licence or planning conditions may be needed.

BNG

Metric Publication Date

A date of the publication of the metric used has been given as 01/01/2024. This is incorrect. Supplying the publication date of the metric used is one of the minimum validation requirements and therefore we need the correct date to be supplied.

Strategic Significance

The location is mapped as a semi strategic area and is adjacent to a strategic area for woodland as shown on the map on the [net gain Staffordshire website](#). The area is not identified for grasslands, therefore the strategic significance in the metric needs to be changed to 'Area / compensation not in local strategy / local strategy'. If woodland was created, then this would be locations ecologically desirable.

MMU

Minor comment, the minimum mapping unit (MMU) is not used in the latest version of UKHab where the descriptions of the habitats need to be read, therefore MMUs should not be used if using UKHab V2.01 July 2023.

Grassland Type and Precautionary Approach

The BNG assessment acknowledges that '*The habitat survey was undertaken outside of the optimal botanical survey season (April to September, inclusive), however this was not considered a significant limitation in identifying onsite habitats and assigning their condition.*'. It also states '*It should be noted that any habitats on site that have evidently been recently destroyed or intentionally degraded will be recorded as the pre-degradation habitat. The habitat lost will be assigned high distinctiveness and good condition in the absence of evidence to the contrary.*'.

The condition assessment has not been supplied, although there is a summary in the BNG Assessment.

A precautionary approach should be adopted in this instance. The grassland has been listed as poor-quality modified grassland.

Evidence available for grassland type:

- Living England Habitat Map maps the area as Acid, Calcareous, Neutral Grassland (Source: MAGIC maps)
- Grassland removed in November 2022

- Condition assessment carried out *'assumed based on the remaining grassland to the north, east and west which was surveyed and considered to be reflective of that lost given its similar species composition across the site.'*
- Survey carried out outside optimal botanical survey season (therefore grassland plants likely missed)
- Grass was short when survey carried out – makes identification of some species difficult and likely flower heads not present.
- Species identified are consistent with modified grassland, however as it was the wrong time of year and the grass was short, species could have been missed.
- Conditions passed C, E, F, G
- Other conditions are difficult to assess:
 - A (vascular plant species) – survey carried out at wrong time of year and grassland short, also habitat no longer present
 - B (sward height) – difficult to assess as grassland no longer there, could rely on landowner knowledge
 - D (physical damage) – difficult to assess as habitat no longer present.

The Statutory Biodiversity Metric User Guide (July 2024) states *'You can use data records, imagery and historic field surveys to determine pre-degradation habitat types. Use a precautionary approach when assigning condition scores. For example, assign a higher condition score in the absence of contrary evidence'*. We would like justification to explain why the lowest value of grassland habitat has been assigned when the grassland was no longer present, is mapped as a higher quality grassland in Living England Habitat Map and surveys of adjacent grassland were carried out at a sub-optimal time of year when the grass was short, therefore species may have been missed. Given that species are likely to have been missed, we would question whether the habitat should have been listed as at least moderate or good quality modified grassland by applying the precautionary approach.

Habitat Degradation Accounted for in the Metric

The report stated that the grassland was lost in November 2022. The metric needs to be updated to reflect the loss of habitat using the delay in starting habitat creation or enhancement function as described below. The Statutory Biodiversity Metric User Guide (July 2024) states:

'Accounting for degraded sites

If a habitat has been cleared, destroyed or degraded previously, and you should use an earlier baseline, you must:

- *use the pre-degradation habitat type as the site's baseline*
- *evidence how this habitat type and condition has been determined in the user comments*

- *record the habitat as lost within the biodiversity metric tool*
- *account for the time between the habitat loss and compensation using the ‘delay in starting habitat creation or enhancement’ function...*

... Advanced or delayed action

You should adjust the temporal risk multiplier to account for any time difference between the loss and compensation, use the:

- *‘creation in advance function’ to reflect the number of years habitat is created in advance of clearance of the habitat on-site (for example, when habitat banking is used)*
- *‘delay in starting habitat creation or enhancement’ function to reflect the number of years the habitat is absent i.e. from clearance of the habitat to the start of habitat compensation for the loss’.*