

Little Gorsty Hill Farm Tenford Lane SWT Further 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:

- Bat Activity Surveys to be carried out on building two.
- Clarify why a PRA was not carried out on building 1 when it is directly attached to building 2
- 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.
- Please fix the inconsistencies in the figures in the updated BNG report (March 2025) and the metric (July 2024)

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. This has not been addressed

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.

An ecological appraisal has been undertaken by Evergreen Ecology:

- The survey was undertaken on 20th February- this is considered a sub-optimal time of year for a survey. As the original survey was carried out in June and the habitats have remained the same it shouldn't be an issue this time.
- Staffordshire Ecological Records was not consulted.
- Bat Activity Surveys are required for building two
- Can more explanation be given as to why building one was not assessed for bat potential when it is attached to building two which will be demolished.
- Map is reused from elite ecology; it is very blurry, and it is not possible to read what the habitats are.

BNG Report

There are repeated inconsistencies in the figures in the updated BNG report (March 2025) that don't match the figures given in the metric headline results (July 2024).

3.1 Habitats

Further detail has been given explaining why the grasslands were assigned the 'modified grassland' habitat type rather than 'other neutral grassland'.

3.3 Strategic Significance

Thank you for the explanation.

Total Net Unit Change

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. Changes have been made.

Recommendations

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.

Explanation given, please note that the off-site habitats will need to be registered as a habitat bank with Natural England prior to the Biodiversity Gain Plan being submitted.

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.

Comment not taken on board – consider this in the HMMP.

Habitat Creation and Management

Our comments regarding habitat creation and management have not been addressed. Any HMMP will need to include management that will allow target habitats and conditions to be met before it can be accepted. This will be needed for the Biodiversity Gain Plan to be accepted.

Timing phasing and Duration of Conservation Measures

Our comments have not been addressed, these will need to be addressed in the HMMP to ensure that the planned habitats will meet target condition.

On-site and Off-site Habitats

Please note our previous comments regarding the red and blue line boundaries. As changes to the boundaries have not been made, it is assumed that the habitat creation and enhancement within the blue line boundary will be registered as a habitat bank with Natural England. If this is the case, then the metric submitted with the gain plan for this application should only contain on-site habitats and reference the off-site habitat bank being used to off-set the losses. The offsite area will need its own HMMP and legal agreement.

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. This has not been addressed.

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. This has not been addressed.

Planning Conditions

Pre-commencement condition of a LEMP ensuring correct ground conditions are established for any habitats to be created. This includes ensuring the correct type of soils for wildflower areas and soil testing is likely to be needed. If the main habitats are delivered off-site this probably isn't needed. If the red line boundary is changed to include the blue line boundary, then it will be.

Pre-commencement condition of a CEMP detailing all ground preparations etc. for contractors to follow.

Condition all trees, shrubs and seed mixes to be native species and of local provenance.

The BNG report has made several suggestions regarding protected species mitigation in section 7.3, these are listed below. 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.

The ecological appraisal report (Evergreen Ecology, 2025) details mitigation measures to be carried out, these should be secured with planning conditions:

- Building B2 has the potential to support roosting bats following an internal and external assessment which identified a number of PRFs. Overall, the building was assessed as having moderate bat roost potential and will require further surveys to confirm absence as per the BCT Guidelines. A total of two dusk emergence surveys will be undertaken between May and September, each being at least 3 weeks apart. In the event of a roosting bat being identified then a third survey visit will be required to confirm roost type and inform a Natural England licence. Upon completion of the further surveys, this report will be updated with

the results and mitigation details. All other buildings are considered to be negligible for roosting bats and can be demolished without the need for further survey. If these are to be demolished prior to the surveys at B2 then these works should be done prior to May and starting in the courtyard working away from B2 to limit any noise and vibration impacts in the event bats are roosting in the building.

- The Site habitats have the potential to support nesting birds. It is advised that the buildings doors are kept closed throughout the Spring/Summer to try and prevent birds nesting within the buildings. In the event this is not practical or works to existing habitats is required during the breeding bird season (March to September) then a nesting bird check should be undertaken by a Suitably Qualified Ecologist (SQE) a maximum of 48 hours prior to works commencing in order to adhere to all relevant legislation. In the event of an active nest being identified then a suitable no works buffer (most likely 5m) will be implemented until chicks have fledged and the nest is no longer in use.
- The embankment habitats have the potential to support badger sett creation. A check of these should be undertaken 48 hours prior to works commencing to ensure no new badger setts have been created. In the event new setts are present, a suitable buffer will be implemented until a licence can be sought for closure.
- Habitat clearance should be done sensitively through a two stage cut to avoid impacting on any hedgehog which may be using the scrub/hedgehog habitat for refuge. This should involve strimming down to 150mm, leaving for 24 hours or checking the area for any hedgehog, and then cutting down to ground level. These works should be completed outside of the hibernation period (March onwards) when hedgehog are active.
- It is highly unlikely any other notable species will be present however if found they should be allowed to move out of the area on their own volition unless in immediate danger of being injured or killed and then should be moved into retained adjacent habitat.

If building 2 is found to support bats, then a sensitive lighting scheme should be implemented.

Regards

31.03.2025