

Apesford Farm SWT Comments

Application Reference: SMD/2024/0529

Location: Apesford Farm

Proposed Development: Erection of replacement dwelling

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. **Our previous comments can be found in black text with updated comments in red text.**

Documents Viewed:

- Biodiversity Net Gain (BNG) Report- Hewitt Carr Services – March 2025 (updated)
- Small Sites Metric (The Statutory Biodiversity Metric) - Hewitt Carr Services – March 2025 (updated)

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

- Soilscales and further information needs to be provided to justify why modified grassland was chosen in the absence of survey data from a suitable time of year.
- Trees planted within the private gardens cannot be recorded in the metric. If the trees are to be planted within the private garden, the metric and Biodiversity Gain Report need updating and this will result in a net % change of -17.38% in habitat units. This does not meet the requirements of the Biodiversity Gain Condition and needs to be resolved.

Biodiversity Net Gain (BNG) Report

- The report is dated as 6th February 2025 but the map on page 4 is dated as 3rd March 2025. Please correct the report date. **Resolved**
- The report lacks any detail regarding the survey method employed to the report. Please clarify what methodology was used. **Resolved.**
- The grassland survey is dated as being undertaken on 6th February 2025. February is outside the optimal survey window for grasslands so we would require the survey is redone in the appropriate window. **Explanation given why the survey was carried out in February, however, this did not provide enough justification and evidence for why the habitat was classified as modified grassland. Furthermore, the MAGIC Living England Habitat Map shows the habitat as acid, calcareous or neutral grassland, therefore we would like to see the Soilscales results and their interpretation that led to the conclusion of this being modified grassland. Details**

of past use and management could help with this explanation. Species indicative of better quality grassland would not be seen at this time of year and if the grassland was short mown remnants would not be visible.

- The report refers to a Site of Special Scientific Interest (SSSI) being with the vicinity of the application site, but no details are given regarding the site's proximity to the SSSI or any other sites that are of nature conservation importance. Please clarify the proximity of the SSSI. **Detail given that the SSSI will not be affected by the scope of works.**
- **As this is a private garden and management and monitoring cannot be legally secured it is not subject to 30 years management and monitoring.**
- Please remove the reference to the Cornwall Biodiversity Action Plan as it is not relevant to the current application. **Resolved.**

Small Sites Metric (SSM)

The SSM requires some clarification regarding the number of habitats to be retained or enhanced. Currently, the fields within the metric for these criteria are blank. **This is resolved as all the habitats within the baseline appear to be lost.**

Tress in private gardens

Please clarify whether the trees planted as mitigation are within the private garden. The metric user guide states that *'You should not:*

- *record the creation of any other new habitats within private gardens'*

Therefore, if the trees to be planted are within the private garden, they cannot be recorded within the metric. Removing the trees from the metric results in a net unit change of -0.0157 habitat units or -17.38%. This does not fulfil the BNG criteria of an uplift of 10% and this will need to be resolved so that 10% BNG is delivered. This may be delivered off site but would need to be in a registered habitat bank.

For clarification, the full BNG metric guidance relating to private gardens is pasted below (p.26 and 27 of The Small Sites Metric (Statutory Biodiversity Metric) User Guide):

'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.’

Previous Comments

Some of our previous comments are still relevant and can be resolved through the application of appropriate planning conditions. We have reiterated these comments below and added conditions at the end of the document.

BIRD AND BAT BOX ENHANCEMENTS

We note and welcome the recommendation in the bat survey report (Etive Ecology 2023) for the installation of four artificial bat roost features and note these will be detailed in the Natural England bat licence. In addition, we note and welcome the recommendation for artificial nest boxes for swift and house sparrow to be installed, although it is not clear from the bat survey report where these would be located. We would wish to see a minimum of four of each type of box installed, and this can be across the wider site if necessary. We recommend a planning condition to secure the location, number and specification of bat roost features and bird boxes.

SENSITIVE LIGHTING SCHEME

We note the site currently provides a dark rural environment after dusk, with no permanent artificial lighting in operation and would therefore support the inclusion of a sensitively designed lighting scheme as detailed in the Bat Survey Report (Etive Ecology 2023) to minimise disturbance to bats and other wildlife including barn owl which is

reported to be using the adjoining farmhouse as a roost/feeding perch. This can be secured by planning condition.

BAT SURVEY AND BAT LICENCE

We have reviewed the Bat Survey Report (Etive Ecology, November 2023). The bat survey was conducted by suitably experienced ecologists at an appropriate time of year during suitable weather conditions. We agree with the conclusion The existing farmhouse/Shippon was assessed to be of High Bat Roost Potential. We note that during the first dusk survey, 2 x common pipistrelles were seen entering the northern gable of the Shippon and 1 x Myotis bat was seen emerging from the eastern gable of the farmhouse and agree with the conclusion that both roosts are summer roosts for a small number of male bats. In addition, we note that foraging activity was recorded in vegetation east of the farmhouse, primarily common pipistrelle and brown long eared bats.

Although the survey data is from the 2023 survey season, it is unlikely that update survey in 2025 would substantially alter the findings, and the results are therefore considered sufficiently up to date to support this planning application.

As confirmed in the bat survey report a licence will be required from Natural England. We recommend inclusion of an informative to obtain a bat licence from Natural England prior to works commencing.

Conditions

We recommend a pre-commencement condition to provide details of the location, type and number of bat and bird boxed to be installed on site. Details should be provided by an ecologist with suitable experience i.e. a bat license. We also recommend a post-commencement condition to confirm that this has been carried out.

We recommend a pre-commencement condition to secure a sensitively designed lighting scheme. We also recommend a post-commencement condition to confirm that this has been carried out.

As stated in the bat survey report a European Protected Species Licence must be applied for and granted before any works may proceed that will impact bats and their roosts. Evidence that the licence has been granted should be supplied including the method statement prior to the commencement of works as a pre-commencement condition. Timing constraints according to the licence should be adhered to.

Regards

Dated 19.08.2025

