

Tompkin Head Farm SWT Comments

Date: 27.11.2025

Application Reference: SMD/2025/0082

Location: Tompkin Head Farm , Tompkin Road , Stanley , Staffordshire , ST9 9NA

Proposed Development: Conversion and alteration of agricultural buildings to form 2no. dwellinghouses, and associated works

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
- BNG Report- Elite Ecology, November 2024
- Bat Activity Report- Elite Ecology, November 2024
- BNG Metric- Elite Ecology
- New Habitat Map- Elite Ecology, November 2024
- Location Plan
- Planning Statement- Rob Duncan Planning Consultancy, February 2025.
- [BNG Report- Elite Ecology, October 2025.](#)
- [New Habitat Map- Elite Ecology, October 2025.](#)

Summary: We recommend **no objection** until the following information is supplied and our comments are resolved:

Further detail

Bat Report

There are bats present in at least one of the buildings, therefore a Natural England license is needed.

BNG Report

Looking at aerial photos there appear to be trees and shrubs to the east on the site that has been mapped as modified grassland. Can clarification be given on why the baseline is not mapped as the aerial photos suggest.

The area habitat loss of the on-site habitat baseline in the metric doesn't match with the table in 4.1 of the report. [This has been resolved.](#)

There are inconsistencies between the written management in section 6.3 of the report and the table of management in 7.2 of the report. [This has been resolved.](#)

At the beginning of the report, in the executive summary, it is suggested that the site will not meet the 10% net gain as most of the uplift is in vegetated gardens which cannot be ensured for management and monitoring. However, this is contradicted with the rest of the report and the metric with there being no mention of vegetated gardens. Looking at the site plans, the majority of the site, including the hedgerows, are part of private or tenanted buildings and therefore cannot be legally secured. Clarification is sought as to whether these will be private gardens as defined in the BNG metric user guide (and therefore should be either vegetated or unvegetated garden), or managed as habitats for 30 years – in which case significant habitats will need to have their monitoring and management secured through a S106 which will need to be agreed prior to a decision being made. The habitats should be listed accordingly. This needs amending in the metric and the rest of the report. The planning statement also suggests a net gain of 200% which does not match the executive summary. [This has been resolved with some areas of vegetated garden included on the metric.](#)

If 10% net gain is not achieved on site, then evidence will need to be given to show that offsite net gain or statutory credits can be secured.

Preliminary Ecological Appraisal and Survey Reports

Section 3.3 of the BNG Report references the Preliminary Ecological Appraisal – please provide a copy of the report for this. [This report has not been provided, however, section 3.3 of the BNG report provides some detail on \[REDACTED\] bats, birds and hedgehogs.](#)

8.6 mentions ‘*Surveys for several taxa are still ongoing for this site. At the time of this report’s write-up this principle has not been met. However, if recommendations are implemented on site this will exceeds what is currently on site offering more habitats in better condition and species-specific enhancements.*’ Please provide these survey reports and inform us of any outstanding surveys and reports. [Further survey reports have not been provided, however, section 3.3 of the BNG report provides some detail on species using the site.](#)

BNG

We would recommend that you should consider whether the Biodiversity Gain Condition is capable of being discharged when creating the HMMP, as, if the Biodiversity Gain Condition cannot be discharged and changes need to be made to any plans, the HMMP may need to be adjusted to accommodate this.

Conditions

All the details of the species boxes suggested in the ‘new habitat map’, such as the height, aspect and specifications should be provided as a pre-commencement condition.

Bats: -

Prior to any works, a Natural England Development Licence is necessary to legally close or disturb the bat roosts. Natural England licences take thirty working days once all the paperwork has been completed and submitted. As part of the licence, post-monitoring surveys will be required in subsequent years to assess whether any bats are using the compensatory measures installed around the site. A pre-commencement condition should require details of the licence to be submitted.

All works on B1 must wait until October/November when the bats typically move to their hibernation roosts. It is possible, however, that some bats may remain within their summer roost over the winter months for hibernation purposes. Due to this, at the beginning of the demolition works, a licenced ecologist is required to undertake soft demolition by accompanying building contractors in inspecting the structure by hand. This will ensure that no hibernating bats are harmed by the works.

Two 1FS Schwegler Large Colony Bat Boxes or similar (one per species) will be required to be installed on the morning of the commencement of the bat inspection. These will need to be situated on nearby trees (facing north) so that any bats found can be translocated to these features and enable the works to commence without impacting upon the bats. To compensate for the loss of common pipistrelle day roosts, a total of four bat access tiles should be installed and to compensate for the Brandt's/whiskered day roost, two Eco Bat Boxes should be installed. Bat boxes should be placed as high as possible, ideally on a southern facing elevation that is free from obstructions and access from predators, such as cats.

Artificial lighting should be avoided around compensatory roosting features. If artificial lighting is required during either the construction or operational phases, a sensitive lighting plan incorporating features such as with sensor lights triggered by large bodies, hoods or cowls and a lux level below 2700k should be submitted as a pre-commencement condition. We would recommend utilising Bat Conservation Trust's [Guidance on Bats and Artificial Lighting at Night](#). This should be submitted and approved as a pre-commencement condition.

A further condition post development should evidence the correct installation of any nocturnal lighting as per the sensitive lighting plan (if required).

Birds:

Due to the confirmed presence of nesting birds in B1 and B2, and the high potential presence of nesting birds in B3, it is recommended that any works on these structures takes place outside the bird breeding season (March to August, inclusive), or if this is

not possible, the buildings must be inspected by a suitably qualified ecologist no more than twenty-four hours prior to the start of the works on these structures.

To compensate for the loss of blue tit nests, two small bird nest boxes should be installed. One artificial overhang containing two No. 10 Schwegler Swallow Nest boxes per feature should also be installed on both B1 and B2. A tawny owl nest box should also be installed onsite to compensate for loss of the tawny owl roost in B2. Bird boxes installed on buildings should face between north and east to avoid the strong sunlight and wet winds. Boxes installed on trees can face any direction as the trees will provide shelter however the entrance must be kept clear of branches and vegetation. All bird enhancements must be situated in a way that prevents access to predators such as cats.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Hedgehogs

It is recommended that precautionary measures are incorporated if construction is undertaken during the active hedgehog season of midMarch to October. This will be to create provisions for hedgehogs to escape from all trenches dug into the ground, by creating slopes or providing ramps at the end of each working day. Additionally, any pipework left on site that is greater than 150mm in diameter will need to be planked off.

We would re-iterate the need for the applicant to secure a bat licence prior to works starting and to implement the recommended mitigation and enhancement measures as set out in the Bat Activity Report and these requirements should be secured via suitable conditions, as appropriate.