

Leonards Farm SWT Comments

Date: 27/02/2026

Application Reference: SMD/2025/0374

Location: Leonards Farm , Hot Lane , Biddulph Moor , Staffordshire , ST8 7HP

Proposed Development: Demolition of a steel-framed building and derelict farmhouse, and construction of a four-bedroom replacement farmhouse

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
- Preliminary Roost Assesment- Apex Ecology, April 2025
- Bat Survey Report- Dunelm Ecology, July 2025
- Revised Location Plan- Tom Ford Architechts, Septermber 2025
- Proposed Block Plan- Tom Ford Architects, August 2025

Summary: On ecological grounds we have **no objections**, subject to the following conditions:

- The production of an external sensitive nocturnal lighting strategy
- RAMs for birds and bats
- The installation of bird and bat boxes
- The creation of an invasive species method statement
- The inclusion of biodiversity measures

Further detail

We have viewed aerial photographs, biological records from Staffordshire Ecological Record (SER), mapping on netgainstaffs and information on DEFRA's MAGIC map to inform our response.

Conditions

If the application is approved, we would recommend that this is subject to the following conditions.

Pre-commencement

Lighting Design Strategy for Light-Sensitive Biodiversity

An external sensitive nocturnal lighting strategy for during and after construction should be secured through a pre-commencement planning condition. The external nocturnal lighting strategy should be designed in line with [the guidance note 08/23 by ILP on Bats and Artificial Lighting at Night](#). Lighting should include cowls / hoods or shields, operational timers and use a lighting spectrum below 2700K. The strategy shall:

- a) identify features on site that are particularly sensitive for bats and that are likely to cause disturbance to their roosting in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for instance for foraging,
- b) Cater for other species such as badger and otters that are sensitive to light pollution; and
- c) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: to comply with the Wildlife and Countryside Act 1981 (as amended), Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1. Many species protected by wildlife legislation are active at night (e.g. bats, badgers and otters are sensitive to light pollution. The introduction of artificial light might mean such species are disturbed / discouraged from using their breeding or resting places.

Reasonable Avoidance Measures

A reasonable avoidance statement should be provided for birds and bats detailing Reasonable Avoidance Measures (RAMs) for these during any further ground clearance works and construction. This should include instructions detailing what should be done if a protected species is encountered and measures to avoid entrapment of mammals during construction works. This should be secured through a planning condition and a provision made for construction personnel sign to say that they have read, understood and will adhere to this.

Reason: to comply with wildlife legislation including the Wildlife and Countryside Act 1981 (as amended), Biodiversity Duty (NERC Act Section 40), NPPF and local plan policy NE1.

A pre-commencement condition detailing a minimum of six bird boxes of a range of types and their citing, and a minimum of at least one integrated bat roosting feature in each gable end along with installation instructions to be submitted to and agreed by the LPA Ecologist. All bat and bird boxes should be made of woodcrete or a similar material to ensure longevity.

Reason: *to comply with wildlife legislation including the Wildlife and Countryside Act 1981 (as amended), Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1, the National Design Guide and Staffordshire Moorlands Design Guide 18 SPD*

Invasive Non-Native species management plan

Prior to the commencement of development, an invasive non-native species management plan shall be submitted to and approved by the local planning authority, detailing the containment, control and removal of Himalayan balsam *Impatiens glandulifera* on site. The measures shall be carried out strictly in accordance with the approved scheme.

Reason: *To ensure that the spread of invasive non-native species is controlled in accordance with the Wildlife and Countryside Act 1981 (as amended).*

Biodiversity Measures

In accordance with the NPPF and Biodiversity Duty, which states that a net gain should be achieved on site, the following measures for biodiversity should be conditioned:

- All trees and shrubs should be native species and of local provenance.
- Fruit bearing trees will be planted
- Hedgehog highways should be created in all fences so that hedgehogs can move freely through the development.
- Any roofing membranes used should not harm bats – if a NBCRM is used, a certificate should be provided that proves the roofing membrane selected has passed a ‘snagging propensity test’.

Reason: *To comply with the Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1, the National Design Guide and Staffordshire Moorlands Design Guide 18 SPD.*

Conditions

Restriction on occupation of development until specific biodiversity outcomes achieved

The development hereby permitted shall not be occupied until bat and bird boxes, hedgehog highways, proof of use of roofing membrane that doesn’t harm bats have

been installed / constructed in accordance with details shown in the bat and bird box plan / biodiversity measures plan.

Reason: to comply with wildlife legislation including the Wildlife and Countryside Act 1981 (as amended), Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1, the National Design Guide and Staffordshire Moorlands Design Guide 18 SPD

Restriction on occupation of development until nocturnal lighting plan implemented

The development hereby permitted shall not be occupied until the sensitive lighting plan for occupation / post construction has been installed / constructed in accordance with details shown in the approved Lighting Design Strategy for Light-Sensitive Biodiversity.

Reason: to comply with the Wildlife and Countryside Act 1981 (as amended), Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1. Many species protected by wildlife legislation are active at night (e.g. bats, badgers and otters are sensitive to light pollution. The introduction of artificial light might mean such species are disturbed / discouraged from using their breeding or resting places.