

Stonehouse Farm SWT Comments

Date: 05/03/26

Application Reference: SMD/2025/0532

Location: Stonehouse Farm, Ash Bank Road

Proposed Development: Demolition of existing buildings on site and erection of Class E retail unit, alongside access, car parking 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
- Preliminary Ecological Appraisal Bat Risk Assessment , BOM-PP-25-06 Bombus Ecology, September 2025
- 2025.12_BNG Metric, Bombus Ecology, 16/12/25
- 2025.12_BNG Report, Bombus Ecology, 18/12/25
- 2025.11_Landscape Plan, FPCR Environment & Design

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

- This application does not meet the minimum validation requirements as stipulated in the Biodiversity Net Gain Planning Practice Guidance. A repeat BNG survey and metric will be required including further clarifications and condition assessments detailed below

Please note that we will submit a more detailed planning response including other biodiversity comments once the issues stated above have been resolved. This may include further planning conditions.

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. We have not visited the site

Application Form

This application does not meet the following minimum validation requirements as stipulated in the Biodiversity Net Gain Planning Practice Guidance, as follows:

- The number of BNG units only states the area habitats not the hedgerows as well – it should be 0.49 units, but the metric needs to be redone, so update when true value known.
- The date of the pre-development value is earlier than the application date. Please provide evidence for the agreement of this date between the local authority and the individual who will be writing the Biodiversity Gain Plan or alternatively use the application date.
- The date of publication for the biodiversity metric used is incorrect

PEA

Please provide a Night Vision Aid (NVA) darkest point photo as per the Bat Conservation Trust good practice guidelines 4th edition, 2024

BNG metric and report

BNG Competency

- The first principle of BNG as detailed in the statutory biodiversity metric user guide is that the metric assessment should be completed by a competent person. Competency is as defined in BS42020:2013 British Standard Biodiversity - Code of practice for planning and development states. Please provide evidence that the person carrying out the BNG assessment is competent to do so.

BNG Survey

- The BNG survey and metric will need to be repeated using the UK Hab methodology rather than phase 1 as the metric is based on UK Hab definitions. There is a Phase 1 convertor within the metric tool.
- A condition assessment will be required for grasslands and hedges as well as a full species list for the hedge is required to determine whether it is species-rich.

BNG Report

- The regular biodiversity metric has been used rather than small sites as stated. Please amend text to clarify the correct version of the metric.
- The BNG report states '*a site visit is conducted to establish the type of habitats present on site using the Phase 1 Habitat Survey methodology*'. This is incorrect, the site should be surveyed using UKHab methodology.
- The BNG report states '*you to choose from Natural England set definitions*', this is incorrect, the habitat classifications are based on UKHab definitions.
- Habitats in the metric should be the same as those detailed in the BNG report habitat maps. Please amend so that all documents match and are correct.
- A BNG report would usually detail the baseline habitats using the UKHab classification system. Please include details of baseline habitats.
- Please clarify whether degradation as defined in the BNG Planning Practice Guidance has occurred as 'tree removed' and 'stumps' are referenced in the proposed site plan. If so, this should be referenced in the BNG report and rules for degradation in the statutory biodiversity metric user guide followed to input this into the metric

Maps

- The redline boundary in the landscape plan does not match the maps in BNG report. The BNG assessment should be carried out covering the area within the red line application boundary and the shape of the maps in the BNG report and total area assessed within the metric should be the same.
- The BNG map of 'proposed enhancement locations for the site' depicts a new hedgerow along the south west side which is not referenced in the text. Please confirm whether hedgerow planting forms part of the post-development plans and clarify within the BNG report and metric that this is a proposed enhancement measure.
- The key on the proposed enhancement map does not explain what the area with small dots is.
- It is unclear what the habitat 'grassland ruderal' on the habitat maps is referring to; this is not a habitat type in Phase 1 or UKHab methodology – for BNG, UKHab surveys should be carried out. 'Hedging' should be referred to in correct the UKHab terminology.

BNG Metric

- The habitats within the metric should be the same as those in the BNG report
- The area of the metric should be the same as the site area in the application form (currently 0.21ha and 2298sq metres).

- The brick wall referred to in the PEA must be included in the BNG metric and maps. Please amend.
- The metric description of the hedge as ornamental does not correspond to the species list in the PEA which indicates the hedge is native. Please provide further detail and update the report and metric accordingly.
- Area of trees should be calculated using the tree helper in the Start tab of the metric which does not appear to have been done
- We appreciate the post construction habitat plan and metric, however they do not correspond to each other

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 (*add species as appropriate e.g. badgers*) and that are likely to cause disturbance to their r 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.

Protection of Breeding Birds During Construction

No removal of hedgerows, trees or shrubs shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the **vegetation is cleared** and provided written confirmation that no birds will be harmed and / or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority. If breeding birds or a nest is found, exclusion zones will be put in place as directed by a competent ecologist until after the young have fledged.

Reason: All British birds, their nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife and Countryside Act.

Bat and Bird Boxes

A pre-commencement condition detailing the number, type and citing of bird boxes and bricks and bat boxes along with installation instructions to be submitted to and agreed by the LPA Ecologist.

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

Biodiversity Measures

As detailed in the PEA and in accordance with the NPPF and Biodiversity Duty, the following measures for biodiversity should be conditioned:

- Installation of bat tiles / bricks - approx. totalling 5 in places where they will not be subject to nocturnal lighting
- Installation of 2 open fronted bird boxes
- All trees and shrubs should be native species and of local provenance.
- Landscape planting of trees that should provide nectar / fruit / nuts.
- 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'.

Details of these should be provided along with a location plan before development commences.

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.*

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 Montbretia Crocosmia spp. 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)*