

Playing Fields Holt Lane SWT Comments

Application Reference: SMD/2024/0400

Location: Playing Fields, Holt Lane, Kingsley, Staffordshire, ST10 2BA

Proposal: Erection of 10no. bungalows: 5no. for the over 55s and 5no. standard market

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.

SWT recommends a **holding objection** on this application until the following queries are resolved:

- The PEA states that there are buildings, built linear features and other developed land within the site. These are not included on the on-site habitat baseline in the statutory biodiversity metric tool with calculations. These need to be added to the metric calculation tool.
- The built linear features should be included on the habitat map.
- Please supply completed habitat condition assessment sheets so that we can check these against the metric.
- Please clarify the further bat surveys needed to assess the operational impacts on bats mentioned in 4.2.3 of the PEA.

Please note that BNG is a pre-commencement condition requiring a HMMP to demonstrate 30 years of management and monitoring to achieve the target habitat. We would expect to see the HMMP for significant on-site habitats based on the government's template and using the companion document. This would need to include details such as soil preparation, appropriate seed mix, managing public use etc. that indicate that the desired habitat is achievable.

Planning Conditions

The PEA makes sensible suggestions of ecological considerations during and after construction. We would recommend that these are secured through appropriate planning conditions, some of these should be pre-commencement. Listed below are most of these recommendations, although planning conditions should be written using the PEA as guidance.

Planning condition to secure reasonable avoidance measures (RAMs) for amphibians and hedgehogs.

The breeding birds mitigation detailed in the PEA should be followed and secured through planning conditions. Specifically 'Site clearance, tree felling, arboricultural works and vegetation removal (including enabling works) are to take place outside of the breeding bird season and should not be undertaken from March to August inclusive. If this is not possible and works need to take place between this period, a targeted breeding bird nest scoping

survey should be conducted by a suitably qualified ecologist immediately prior to the works, or an ecological clerk of works appointed to oversee the works.'

Provisions for loss of bird foraging and nesting habitat should be provided through planting and provision of nest boxes. A pre-commencement condition should be set to specify the number, type (some suitable have been suggested) and citing of bird boxes provided as mitigation for the loss of nesting habitat. Landscape design should follow recommendations in the PEA.

External nocturnal lighting should be designed to avoid any light spill into the vegetation, with particular reference to the line of trees along the eastern site boundary and woodland in the south eastern corner of the site. A sensitive lighting plan should be delivered as a pre-commencement condition to ensure there are not negative impacts on nocturnal wildlife as a result of this development.

Root protection areas (RPAs) of retained trees and hedges should be secured during construction.

We would welcome the provision of bat boxes appropriately cited as detailed in the PEA.

[Application Form – Incorrect BNG Information.](#)

Information relating to BNG on the application form is incorrect and needs to be corrected. The date the on-site pre-development value was calculated should be the date of the application or an earlier proposed date. The date on the application form is 30/08/2024, this is earlier than the date the application was submitted which was 03/09/2024, therefore a reason for an earlier date should be agreed with the LPA and provided on the planning application form. the publication date of the biodiversity metric used is incorrect in the application form, it was published 12th February 2024. The application form also states that the predevelopment biodiversity value is 1, this is incorrect.