

Knypersley Sports Club Tunstall Road SWT Comments

Application Reference: SMD/2025/0007

Location: Knypersley Sports Club Tunstall Road

Proposed Development: Proposed replacement building forming children's nursery

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 read:

- Arboricultural Impact Assessment
Land at Bee Active, Tunstall Rd, Stoke-on-Trent ST8 7AH
November 2024
Prepared by Jenna Young – Arboriculturist
- Preliminary Roost Assessment, Knypersley Sports Club, Knypersley, December 2024 by Elite Ecology
- Existing floor plan by Forefront Development Consulting, 09/12/24
- Proposed floor plan by Forefront Development Consulting, 09/12/24

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

- BNG assessment – completed statutory or small sites statutory biodiversity metric calculation tool.
- BNG statement or report to accompany the completed metric ensuring to supply minimum information requirements as detailed in the [government's Biodiversity Net Gain Planning Practice Guidance](#).
- GLTA of tree on site and any further surveys as advised.
- Assessment of the tree for breeding bird potential

BNG

There is a mature tree within the red line boundary of this application. This has been assessed as part of the Arboricultural Impact Assessment and this measured the stem diameter at 1.5m to be 500 and 800mm. This also stated the physiological condition is fair and structural condition good and the tree is mature. The tree is categorised in group B- trees of moderate quality and is 1 and 2 – downgraded because of impaired condition and landscape qualities.

Putting this into the Small Sites Metric as a large tree (diameter at breast height >60 <90cm gives an area of 366m² and baseline units of 0.3369. The small sites metric needs to be filled out by a competent person as defined in the user guide.

Putting this into the Statutory Biodiversity Metric Tool in moderate condition gives an area of 0.04ha and units as 0.29 – this would need to be filled out by a competent person as defined in BS8683:2021 *‘person who can demonstrate they have acquired through training, qualifications or experience , or a combination of these, the knowledge and skills enabling that person to perform a specified task’*.

Both of these areas are above the 25 square metres of non-priority on site habitat; therefore, the proposed development does not meet the de minimis exemption threshold and the application is subject to the biodiversity net gain condition.

The site is in a strategic area as shown on [net gain maps](#), the habitat associated with this is pastures, with nearby significance for grassland. As the strategic area is not for woodland, this is classed as not in a strategic area for the metric.

Bat and Bird Assessment of Tree

The Preliminary Roost Assessment assessed one building for bat and birds. It did not assess the mature tree assessed in the Arboricultural Impact Assessment. The Arboricultural Impact Assessment described the tree as a *‘Street tree growing in stone wall alcove. Stems contacting stonework of wall. Old pruning wounds from previous crown raising works. Some minor branch knothole cavities and minor dead branches throughout crown, typical of age and species’*. The presence of cavities and pruning wounds could provide potential for bat roosts and this needs to be assessed. The Arboricultural Impact Assessment did not carry out an assessment for bats and birds. Therefore, a PRA / GLTA for bats and birds on the mature tree is required, this may recommend further surveys or mitigation measures. An addendum to the existing PEA will be accepted.