

Rudyard Vale Caravan Park Lake Road SWT Comments

Date: 09/07/25

Application Reference: SMD/2025/0053

Location: Rudyard Vale Caravan Park , Lake Road , Rudyard , Staffordshire , ST13 8RN

Proposed Development: Full planning application for demolition of building and alterations to site layout to accommodate 49 static caravans with associated internal access roads and parking areas and amendment to occupancy dates to permit all year round opening.

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
- Ecological Impact Appraisal
- BNG Report
- Location and Site Plan
- Existing Site Plan
- Proposed Site Plan

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

- We have insufficient information to determine whether the Biodiversity Gain Condition is capable of being discharged. This will need to be determined by the planning case officer when making their decision. Details of what is required are in the text below.
- The EIA states there were “areas of recently cleared ground which were previously where buildings, static caravans and modified grassland”, these have been mapped as artificial unvegetated unsealed surface in the Statutory Biodiversity Metric. Due to the degradation of the habitats present on site the approach within the Statutory Biodiversity Metric User Guide should be followed;
 - *“use the pre-degradation habitat type as the site’s baseline”*
 - *“evidence how this habitat type and condition has been determined in the user comments”*
 - *“record the habitat as lost within the biodiversity metric tool”*
 - *“account for the time between the habitat loss and compensation using the ‘delay in starting habitat creation or enhancement’ function”*

- Please explain whether a data search for protected and priority habitats and species was carried out. This is not mentioned in the 'desk study' section but 3.38 references records. It is unclear where the records came from and whether a data search was carried out. If a data search was not carried out, please provide justification as to why this was not undertaken.

BNG

BNG is a material consideration and we have insufficient information to consider whether the Biodiversity Gain Condition is capable of being discharged. To enable us to do this for this application, we require the following information:

Significant On-site Habitats

- Soil test showing conditions are suitable for creation of good quality Other Neutral Grassland (ONG) (this is required after conditions have been created). This habitat requires low nutrient soils and, if soil conditions are not correct, good quality ONG is unlikely to be achieved. If only moderate quality ONG is achieved there will only be a net gain of 7.48% and the net gain condition will not be met, so we need to be sure that the habitat has every chance of success in being delivered.
- A LEMP for the creation of suitable ground conditions for the habitats you are creating, this will also detail the seed mix that is to be used that matches the soil and site conditions.
- Draft HMMP detailing management to create desired habitat, timings of when you would expect to see certain conditions and remedial measures for if things do not go to plan.
Details of the S106 agreement securing 30 years of monitoring and management of the significant on-site net gain. This should include a definition of what is considered the completion date i.e. when the 30 years will start. This needs to be agreed with the LPA prior to determination. This S106 agreement should either include the approval of the HMMP or this could be approved in a separate condition, ideally the HMMP should be approved in conjunction with the net gain plan. This should include measures of success and remedial measures if things are not going to plan. We would need to see details of this to determine whether enough measures are in place to ensure that at least 10% BNG is delivered 30 years after development has finished. You may wish to submit a draft Biodiversity Gain Plan to provide evidence that the trading rules / net gain hierarchy etc have been met.
- 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

The proposed works should be carried out using Precautionary Working Measures, these should be included in the CEMP and a sign off system in place to show that workers have read and understood these measures prior to the commencement of works;

- Herptiles - during construction works, materials that require piling will be stored on pallets within areas of bare ground above ground level, to prevent reptiles or amphibians from seeking shelter below.
- Entrapment of mammals - no works which include the creation of trenches or culverts or the presence of pipes shall commence until measures provided to protect from being trapped in open excavations and/or pipe and culverts through the creation of sloping escape ramps for , which may be achieved by edge profiling of trenches/excavations or by using planks placed into them at the end of each working day, and open pipework greater than 150mm outside diameter being blanked off at the end of each working day.
- Bats – a pre-commencement condition for a sensitive nocturnal lighting scheme plan or Construction Method Statement for during the construction and operation phases of the development to be submitted and approved prior to the commencement of development. This should be designed to avoid illuminating habitats used by bats, such as scattered trees, in accordance with guidance set out in Bats and Artificial Lighting at Night (ILP, 2023) and as detailed in the Ecological Impact Assessment. Consideration should also be given to the times automatic lighting will be on, to maximise the amount of time the area is in darkness throughout construction works and once construction is complete. Low intensity bulbs (sodium lamps) should be used, with lamps fitted with spill accessories to avoid upward spill. A further condition should ensure that the lighting scheme has been delivered as specified in the sensitive nocturnal lighting plan.
- No removal of hedgerows, trees or shrubs shall take place between 1st March and 31st September 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 LPA.

- Hedgehogs - any areas of debris which require removal to facilitate the works will be removed by hand outside of the hedgehog hibernation period (Between March and October inclusive), under supervision of a suitably qualified ecologist.
- As detailed above there should be a section 106 agreement securing the 30 years of management and monitoring of significant on-site BNG.
- There should be a condition securing the HMMP (to be considered alongside the net gain condition).
- There should be a condition securing the grassland enhancement prior to the HMMP starting – this may be in the form of a LEMP.