

25 September 2025

RammSanderson Ecology Ltd
Head Office:
Oban House, 8 Chilwell Road,
Beeston, Nottinghamshire,
NG9 1EL
Tel: 0115 930 2493

Andrew Johnson,
High Peak Borough Council and Staffordshire Moorlands District Council

Issued by email only

RE: RESPONSE TO LAND OFF MANILFOLD DRIVE PRELIMINARY ECOLOGICAL APPRAISAL REPORT

Dear Andrew,

I am writing to you in response to comments made by the Staffordshire Wildlife Trust (SWT) regarding the Preliminary Ecological Appraisal Report (PEAR) (ref: RSE_9658_R1_V1) issued by RammSanderson in May 2025.

Further bat surveys

The PEAR mentions “Given the presence ‘several mature trees’ and the proposed scale and likely impacts of the proposed development we would request that a full Ground Level Tree Assessment (GLTA) is carried out.” However, it has been confirmed that the works will be situated away from any potential roosting feature or habitat in excess of ten metres. The proposed works have been assessed against the mitigation hierarchy and as such avoidance of direct and in-direct impact is achievable. Subsequently a GLTA is considered disproportionate when considered alongside the mitigation measures proposed. Any disturbance is likely avoided through the sensitive design of the Site and the implementation of a Construction Ecological Management Plan (CEMP), which can be secured through a suitably worded condition.

The detail on the suitability of the site for foraging and commuting bats in the report has been considered contradictory. This text has now been clarified within the amended report in terms of relevant habitat connectivity and fragmentation; “*The Site was not considered to be of high suitability due to an absence of high-quality continuous habitat on the Site such as broadleaved woodland or tree lined watercourses which could be used frequently by large numbers of bats. The Site is relatively small in size and is situated within close proximity to urbanised areas providing limited foraging opportunities for small numbers of bats only. Moreover, there remains much more substantial, higher quality habitats present to south of the Site where there is a network of hedgerows with mature trees which are connected with larger areas of woodland locally. Habitats that offer substantially higher quality commuting and foraging habitat, (present to south of the Site), lacks connectivity to the Site. This is due to the fragmented nature of woodland present and the absence of tree lined watercourses*”.

Surveyor competency

Within the comments provided by the SWT, more detail was requested regarding the competency of the onsite surveyor which is provided below.

The PEA/UKHab/BNG Condition Assessment survey was completed by Ewa Tomalak, who has worked as a professional consultant ecologist for over eight years and has recently submitted an application for Full CIEEM Membership. Ewa is appropriately trained and experienced to complete habitat condition assessments to inform BNG with the below providing a brief summary of the experience and training Ewa has received.

Experience

2018-2020 Acted as an assistant to multiple Phase 1 surveys when working for Jacobs Ltd.

2020-2021 Began undertaking simple Phase 1, PEA and UKHab surveys.

2021- Present - Confidently leading PEA, UKHab and BNG condition assessment surveys across a range of sites.



Training

June 2018- Cheshire Wildlife Trust Lyme Park- Introduction to grasses, sedges and rushes workshop- one day training-confirmation of participation
 June 2019- FSC Preston Montford- Training in Top 10 Plant Families- FSC one day training- confirmation of participation
 January 2021- TCV Scotland- Winter Tree ID Zoom webinar
 2021 - UK Habitat Classification Training- confirmation of participation
 2023-Trees in development- online training certificate held
 2023- Trees and the law- online training certificate held
 June 2023- CIEEM Biodiversity Metric 4.0: Everything you need to know and more
 2025 Internal training RammSanderson training: Grasses, Rushes and Sedges
 2025 Internal training RammSanderson training: UKHabs and BNG

Ditches

Clarification has been sought as to why the two ditches mentioned in the PEA and further ditch mentioned in the Flood Risk Assessment and Drainage Strategy were not included in the Statutory Biodiversity Metric Calculation Tool (SMBCT). These ditches were already included within the SMBCT as **Hedgerows with associated banks or ditches**. Both are small dry ditches that are unlikely to retain water for most of the year. The text relating to their description in the PEAR has been clarified and their UKHab primary code has been changed from **Other rivers and streams – Ditch (r2b-50)** to include them as a secondary code (**50 – Ditch**) for the hedgerows instead as this better reflects their character.

Regarding the further ditch mentioned within the Flood Risk Assessment, we assume that this is referring to the 'drain' located to the east of the site (see Figure 1 below). The surveyor found no evidence of this during their survey within the site boundary with Figure 2 showing the area onsite where the ditch should be. There drain/ditch has therefore been considered offsite and therefore emitted from the PEAR and BNG Metric calculations.



Figure 1: Drain located offsite (circled in yellow)

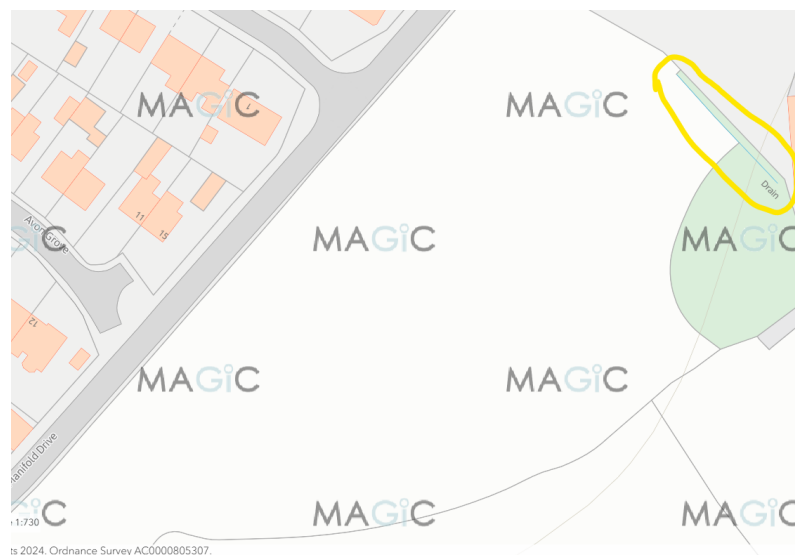


Figure 2: Photograph of the area where the additional ditch should be located



BNG strategic significance

A small area in the east of the site is classed as semi-strategic for pastures on the Net Gain Staffordshire map (<https://netgainstaffs.com/map/>). The metric should be updated to account for this – modified grassland should be classed as 'location ecologically desirable'; this changes the score for the metric.

After reviewing the Staffordshire Moorlands Local Plan 2014 – 2033, the Staffordshire Moorlands Interactive Map, and Magic Map, the site has no connectivity to designated sites or features of importance and so it is not considered to be formally within any Local



Strategy. However, in light of the information source provided by SWT, the site does indeed fall within the Trust's Nature Recovery Network Map for Pastureland. As such, the modified grassland habitat onsite has subsequently been reclassified as 'Location ecologically desirable but not in local strategy' within the updated Metric (RSE_9658_BIA_V2R3). This has resulted in an uplift in baseline biodiversity units for this habitat type meaning that the scheme will incur a greater loss than reflected within the previous Metric. The PEAR has also been amended to reflect these changes. The condition assessment criteria met for each respective habitat are also outlined within the comments section of the Metric for reference.

Offsite compensation

With the Scheme currently sitting at a net loss of 1.85 biodiversity habitat units (-30.02%), it has been requested that more detail be provided on how the client intends to offset these losses and achieve the mandatory 10% net gain as a result of the proposed scheme. To make up the 2.47 biodiversity unit deficit, it is the intention to carry out some offsite compensation within the client's wider ownership (Blue Line Boundary) as shown within the Appendix of this report. This area of land is considered to be suitable for offsetting biodiversity losses, being comprised of similar habitat types and being situated adjacent to the planning application site. However, at this stage it is not known how much of this land will be available for offsite compensation especially due to the lack of baseline data on the habitats present and so it may be necessary to purchase biodiversity units from a local habitat bank provider also. Exact details of which route will be taken will be determined following planning consent. Similarly, while it has also been requested that a draft Habitat Mitigation and Management Plan (HMMP) be produced and submitted with the planning application outlining how exactly on and off site BNG will be secured. As this is not a mandatory requirement under Local Planning Policy, it requested that this be made a pre-commencement condition of planning as is typical with most planning applications of this nature.

I this provides the necessary clarification. Should you have any queries, or require any further clarifications, please do not hesitate to contact me directly.

Yours sincerely,
 Phil Newberry
 Principal Botanist
 Email: p.newberry@rammsanderson.com

For and on behalf of RammSanderson Ecology Ltd.

Enclosures:

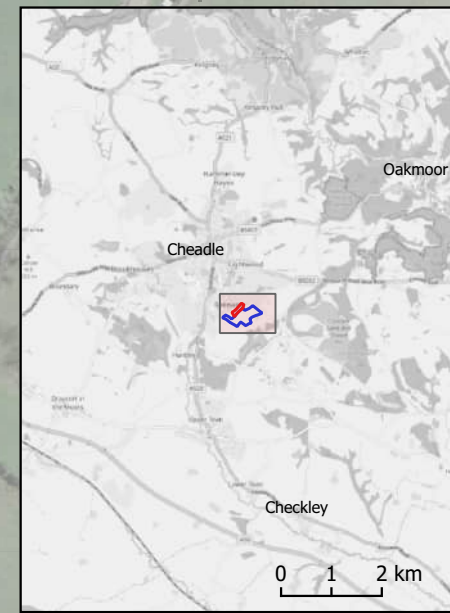
Appendix 1: Planning Application Boundary and Offsite Land Ownership Plan





Key

- Planning application boundary
- Land within wider ownership



		
Title: Site Context Plan		
Project: Land off Manifold Drive, Cheadle		
Client: CCP Developments (Stone) Limited		
Date: 25/09/2025	Fig:	Author: YH
A4 Scale: 1:3750	ID: RSE_9658_STC_0325_V2R1	