

31/10/2025

Mr Peter Jackson
DCMS
597 Etruria Road
Basford
Stoke on Trent
ST4 6HP

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

Discharge of condition 3 in relation to SMD/2025/0092
Well House Farm Rudyard Road Biddulph Moor Staffordshire ST8 7JW

I am writing to you regarding the discharge of condition 3 in relation to SMD/2025/0092 (application ref DOC/2025/0067):

3) No development shall commence until a Habitat Management and Monitoring Plan (the HMMP) has been submitted to and approved in writing by the local planning authority. The HMMP shall be prepared in accordance with the Biodiversity Gain Plan (BGP) and shall include:

- a) A non-technical summary;
- b) The roles and responsibilities of the people or organisation(s) delivering the HMMP;
- c) The planned habitat creation and enhancement works to achieve biodiversity net gain in accordance with the approved BGP, to include details of the timing of the implementation of the works;
- d) The management measures to be undertaken to maintain habitat in accordance with the approved BGP for a period of 30 years from the date of the completion of development; and
- e) Details of the methodology and frequency by which the habitat creation and enhancement works will be monitored and reported to the local planning authority.

Notice in writing shall be given to the Council when (i) the HMMP has been implemented, and (ii) the habitat creation and enhancement works set out in the HMMP have been completed. The approved HMMP, including the management, monitoring, and reporting measures, shall be carried out in complete accordance with the approved details.

Having received a consultation response from the Staffordshire Wildlife Trust, the **application to discharge the HMMP condition is hereby refused**. If you wish to resubmit the application further information is required / revisions of documents as detailed:

- Please provide a new statement of competency in the BNG report regarding the person who has completed the metric assessment
- Please could the applicant clarify whether the land is within the curtilage of a privately owned or tenanted dwelling.

- To comply with BNG requirements, please include all required information in the HMMP for BNG as detailed in Natural England's HMMPT checklist 2.0 or use the Natural England HMMP template.
- HMMP - Please provide further detail as to what is mitigation for species mentioned in the PEA and what is mitigation for BNG
- Please submit a revised completed statutory biodiversity metric calculation tool (SBMCT) that is in line with the HMMP or a HMMP that delivers as per the SBMCT and net gain report supplied in the application
- Please could the applicant clarify whether the land is within the curtilage of a privately owned or tenanted dwelling.
- We would like clarification as to whether the HMMP gives the required detail in all of the British Standards quoted. If not, please provide some assurance that the personnel responsible for implementing the HMMP have access to all of the British Standards mentioned.
- If other neutral grassland in at least moderate condition is being delivered, please provide the results of the soil test with details of an appropriate seed mix to be used for the grassland, so that we can be sure that the planned 'diverse meadow' is capable of being delivered.
- Please include UKHab habitats in the pre and post development habitat plans – the habitats in the key do not relate to the habitats in the completed SBMCT.
- Please agree monitoring frequency with the LPA or Responsible Body that the legal agreement is with securing the delivery of the off-site (blue line boundary) BNG
- Please submit a net gain plan that is in line with the SBMCT, net gain report and HMMP i.e. all BNG is being delivered off-site, not on-site as per the current net gain plan.
- Please note that the off-site BNG needs to be registered as a habitat bank with Natural England and will need to be secured either through a S106 with the LPA or a conservation covenant with a responsible body. Details of this need to be included in the net gain plan.

Full comments from SWT can be viewed on the application page on our website.

We note that the HMMP also contains the Net Gain Plan, so have assumed that the applicant wishes for the application to also consider discharge of the statutory biodiversity net gain condition as well as the condition regarding the HMMP.

For the avoidance of doubt the details submitted are also unsatisfactory to address that condition for the reasons set out in the SWT comments and **discharge of the statutory condition is also hereby refused.**

If you have any questions regarding this letter please contact Reuben Berriman.

Yours faithfully,

31/10/2025

X *B.J. Haywood*

Signed by: Ben Haywood

Head of Development Services