

# Playing Fields Holt Lane SWT Comments

**Date:** 28<sup>th</sup> October 2025

**Application Reference:** SMD/2025/0305

**Location:** Playing Fields Holt Lane Proposed Development: Erection of 9no. bungalows: 4no. 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.

## Documents Viewed:

- Application form
- Existing site layout, Hammonds Construction Ltd, April 2024
- Proposed Site Layout Plan, Hammonds Construction Ltd, June 2025
- Proposed Site Location Plan, Hammonds Construction Ltd, June 2025
- Planning Statement, Byall Oliver Limited, 21<sup>st</sup> June 2025
- Biodiversity Net Gain Statement, UES, 25<sup>th</sup> July 2025
- Biodiversity Net Gain Completed Metric
- Biodiversity Net Gain Condition Assessment
- Preliminary Ecological Appraisal, UES, 23<sup>rd</sup> September 2024

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

- The published date of the metric used is listed as 30/08/2024, this is not a date that the metric was published. Minimum validation requirement not met
- The pre-development biodiversity value is dated for 30/08/2024, this is before the date that the application was submitted. This date should have been agreed between the person writing the biodiversity gain plan and the LPA with reasoning given for an earlier date on the application form please provide evidence of this agreement. Alternatively, the date that the application was submitted should be given. Minimum validation requirement not met
- Biodiversity value incorrect on the application form.
- Please provide details of how off-site BNG is to be delivered
- Please either change the plans so that a priority pond can be delivered or change the type of pond in the metric to one which is achievable
- Please provide a draft HMMP which includes remedial measures for if the enhanced grassland does not reach condition and also maintenance to ensure the priority pond meets all of the criteria in the habitat condition assessment.
- It appears information regarding badgers has been removed from the PEA, please provide an unredacted version.

## Further detail

### Application Form

Predevelopment biodiversity value is 1 and the date this was calculated is 30/08/2024. This is prior to the date that the application form was submitted, which is dated 22/06/2025. Please supply evidence that this earlier date has been agreed between the person who will be writing the biodiversity gain plan and the LPA with reasoning given for an earlier date on the application form. Alternatively, the date that the application was submitted should be given. Please correct, this is a minimum validation requirement as per the [BNG PPG](#). This application should not have been validated. In addition, the BNG report stated the biodiversity value is 4.09 habitat units and 0.91 hedgerow units, therefore the value on the application form is incorrect.

The date that the version of the metric was published is also given as 30/08/2024. This is not any date that the statutory biodiversity net gain metric was published. Please correct, this is a minimum validation requirement as per the [BNG PPG](#). This application should not have been validated.

### BNG

Some of the grassland is being enhanced from poor condition modified grassland to good condition other neutral grassland. Modified grassland usually occurs on enriched soils but this is a former playing field and there is other neutral grassland already adjacent to the modified grassland. Having spoken to the Ecologist, they feel that this is achievable on this site. In the HMMP, we would like to see remedial measures put in place to ensure that the target condition is reached within the 15 years allowed in the metric.

We would like to see details of the planned pond to check that it is capable of becoming a priority pond in good condition. It would need to pass all 9 of the criteria. This includes:

- Good water quality with no signs of pollution
- There is semi-natural habitat completely surrounding the pond for at least 10m from the ponds edge
- Less than 10% of surface covered by duckweed or filamentous algae
- No dams, pumps or pipework
- Absence of non-native plants and animals
- Not artificially stocked with fish
- Emergent, submerged or floating plants cover at least 50% of the pond area
- Pond surface no more than 50% shaded but adjacent trees and scrub.

Currently the plans do not allow the second criteria to be met. Plans should be changed to allow at least 10 m of seminatural habitat around the whole of the pond, or the pond

type changed on the metric and report. Plans should also show no pipework going to the pond and there should be evidence that polluted water will not runoff into the pond to maintain good water quality and discourage duckweed and filamentous algae.

#### *Off-Site BNG*

As not all of the BNG will be delivered on-site, some will need to be supplied elsewhere. Please provide details of how this is to be achieved. This is important as, if a S106 is required on blue line boundary land, this will need to be put in place before a planning decision can be reached.

We have insufficient information to consider whether the Biodiversity Gain Condition is capable of being discharged. Significant on-site BNG needs to be managed and monitored for 30 years, to enable a S106 to be set up to enable the LPA to monitor this, details of the monitoring and management are required. To enable us to do this for this application, we require the following information:

- Draft HMMP to allow S106 to be set. This should use the Natural England template and 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 (especially for the poor condition Modified Grassland being enhanced to good condition Other Neutral Grassland). It should also include measures recommended in the PEA regarding pruning.
- Detail in the LEMP of the creation of suitable ground conditions for the habitats that are being created
- You may wish to submit a draft Biodiversity Gain Plan to provide evidence that the trading rules / net gain hierarchy etc have been met, however we are not insisting on this at this stage – this will be required as a pre-commencement condition

#### *Off-site delivery of BNG*

- If the BNG is being delivered off-site then some detail on how this may be achieved, especially if this is on blue line boundary land a S106 would need to be set up to secure the BNG.

A condition or S106 will be needed to secure the monitoring of 30 years of management and monitoring after the development has finished. This needs to be agreed with the LPA prior to determination. This condition or S106 agreement should either include the approval of the HMMP or this could be approved in a separate condition. Ideally 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.

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.

## PEA

RAMs for badgers are mentioned, however they are not in the version of the PEA that we have. These should be provided along with any other omitted details regarding badgers.

## Conditions

List anything that needs conditioning – this would include recommendations in the Ecologist's report.

### *Pre-commencement*

A sensitive nocturnal lighting scheme should be secured through a pre-commencement planning condition. Any external nocturnal lighting both during and after construction should be designed in line with guidance from the [BCT on Bats and Artificial Lighting at Night](#). Lighting should include cowls / hoods or shields, operational timers and use a lighting spectrum ideally below 2700K. This should avoid overspill onto the vegetation, with particular reference to the line of trees along the eastern site boundary and woodland in the southeastern corner of the site.

A pre-commencement condition for plans to be submitted detailing the number, type and citing of bird and bat boxes as per the PEA and to comply with the NPPF, Local Plan, Government guidance and NERC Act. These should be made of sturdy materials such as woodcrete. Plans should also provide provisions for hedgehog highways allowing hedgehogs to move freely between the gardens.

The development shall not commence until a [Habitat Management and Monitoring Plan (the HMMP)], prepared in accordance with the approved Biodiversity Gain Plan using the Natural England template and including:

- a non-technical summary;
- the roles and responsibilities of the people or organisation(s) delivering the [HMMP];
- the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority,

has been submitted to, and approved in writing by, the local planning authority.

No development shall take place until a Construction Environmental Management plan (CEMP) has been submitted to the local planning authority (LPA) this must include:

- Risk assessments of potentially damaging construction activities.
- Identification of biodiversity protection zones.
- Practical measures during construction to avoid or reduce impacts during construction (may be provided by method statements).
- The location and timing of sensitive works to avoid harm to biodiversity.
- The times during construction works when specialist ecologists need to be present on site to oversee works.
- Responsible persons and lines of communication
- The role and responsibilities of an ecological clerk of works or similar competent person.
- Use of protective fences, exclusion barriers and warning signs.
- Pollution protection measures for woodland – reducing dust / runoff

The CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with approved details, unless otherwise agreed in writing with the LPA.

A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the Local Planning Authority prior to the commencement or of the development. This should cover aspects not included in the HMMP and ground preparation in advance of the HMMP being followed as well as:

- Description of creating appropriate ground conditions for the planned habitats
- Description and evaluation of features to be managed.
- Ecological trends and constraints on site that might influence management.
- Aims and objectives of management.
- Appropriate management options for achieving aims and objectives.
- Prescriptions for management actions.
- Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- Details of the body or organization responsible for implementation of the plan.
- Ongoing monitoring and remedial measures.

In addition, the following measure set out in the PEA should be incorporated into the LEMP:

- Implementing good horticultural practice in any landscaping scheme, including the use of peat-free composts, mulches and soil conditioners.

- The use of pesticides (herbicides, insecticides, fungicides and slug pellets) should be discouraged to prevent fatal effects on the food chain. Any pesticides used should be non-residual.
- Excessive removal or pruning of trees and hedgerows should be avoided to maximise the growth and plant matter available to wildlife. Pruning should be left until late winter to leave seeds and berries for wintering wildlife and to ensure no impact on breeding and nesting birds.

As per the PEA, principles and landscaping ideas beneficial to wildlife and relevant to this site to be included in the LEMP include:

- Planting and management of hedgerows
- Planting of berry and nut bearing shrub species to encourage winter birds
- Planting and management of shrubs which develop a mosaic of structures to support breeding birds
- Use of nectar bearing flowers to encourage invertebrates (such as bees, flies, beetles and butterflies)
- Species are to be native of local provenance or to have a proven benefit to biodiversity.
- Details of how the priority pond will be created.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

A reasonable avoidance statement should be provided for amphibians, badgers and hedgehogs detailing Reasonable Avoidance Measures (RAMs) for these during any further ground clearance works and construction and be included in the CEMP and be signed off as read by construction personnel. This should include instructions detailing what should be done if a protected species is encountered and measures to avoid entrapment of mammals during construction works. This should be secured through a planning condition and a provision made for construction personnel sign to say that they have read, understood and will adhere to this.

As per the PEA, RAMs for amphibians should include:

The following RAMs should be implemented on site during the construction phase of the development:

- The grasslands are to be maintained at its current short sward length of below 10cm through a regular mowing regime until the works on site have been completed.
- Any potential hibernacula, including areas of woodland or scrub that may be removed, will be removed following a fingertip search to minimise the risk of harm to common amphibians that may be using these areas for shelter.
- No excavations are to be left open overnight. If this is not feasible a plank should be left within the excavation at a 45-degree angle to allow amphibians to escape. Any open excavations should be checked for amphibians in the morning prior to start of works on site.
- All excavations will be checked for trapped or sheltering wildlife immediately prior to any infilling works.
- Materials will be stored on pallets off the ground in order to reduce the risk of amphibians sheltering underneath them.
- The hedgerows and trees along the site boundaries should remain, where feasible, to continue to provide shelter and connectivity across site for amphibians and fauna. Alternatively, connectivity should be implemented as part of a detailed landscaping scheme.
- If any suspected GCNs are encountered, work on site is to stop immediately and ecological advice from a licenced Ecologist is to be sought.

**As per the PEA, RAMs for badgers and hedgehogs should include:**

**To be inserted when provided**

### *Conditions*

A condition for providing evidence that the sensitive lighting plan has been followed and implemented.

A condition for providing evidence that the bat and bird boxes and hedgehog highway have been installed.

As per the PEA, if the development proposals change, a condition should secure that a ground level tree assessment (GLTA) should be undertaken of all trees that have the potential to be adversely impacted by the development, including felling, arboricultural works or significant levels of disturbance, to assess their potential to support roosting bats. This survey can be undertaken at any time of the year. If any trees due to be adversely impacted are found to have the potential to support roosting bats, aerial tree inspections should be conducted. If any potential roosting features are still found to be suitable following the inspections, further bat presence / absence surveys or further aerial inspections may be required, which would need to be undertaken during the peak bat survey season (May to August inclusive). The condition should also allow for any recommendations as a result of these surveys to be adhered to.

As per the PEA, site clearance, tree felling, arboricultural works and vegetation clearance 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 during this period, a targeted nest survey is to be undertaken immediately prior to the works by a suitably qualified ecologist or an ecological clerk of works appointed to oversee the works.

As per the PEA, hedgerow, trees and woodland are to be retained where possible, or replaced as part of a detailed landscaping scheme with only native species preferably of local provenance. If the development proposals change to impact the woodland onsite, any woodland lost will need to be replaced two-fold in terms of area in an appropriate location and three trees planted for every one lost.

A condition relating to root protection areas (RPAs) should be set including an appropriate area for fencing to be installed to protect roots and no storage of materials under trees – this should be clarified with the tree officer.