

Land East of Manifold Drive SWT Comments

Date: August 2025

Application Reference: SMD/2025/0243

Location: Land East of Manifold Drive and South of Rakeway Road

Proposed Development: Outline planning permission with some matters reserved for access for residential development and associated landscaping and on-site infrastructure

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
- Preliminary Ecological Appraisal Report, RSE_9658_R1_V1_PEAR, RammSanderson, May 2025
- Statutory Biodiversity Metric Calculation Tool completed on 16th May 2025 by Erika Nishitani
- Planning statement, Knights, May 2025, Ref CCP5/2/PS
- Flood Risk Assessment and Drainage Strategy, May 2025, Waterco, ref: 14911-FRA & Drainage Strategy-03
- BIA Proposed Habitat Plan, RammSanderson, Ref: 25037, 16/05/2025
- BIA Baseline Habitat Plan, RammSanderson, Ref: 25037, 16/05/2025
- Proposed sketch site plan, Calderpeel Architects, 10.04.25
- Site Location Plan, Calderpeel Architects, 30.04.25

Summary: Please note we are awaiting a response from SMDC about how they would like to BNG in an outline application and will likely need to redress our comments relating this. We recommend a **holding objection** until the following information is supplied and our comments are resolved:

- Please carry out a full GLTA.
- Please carry out bat transect and automated detector surveys as per current survey guidance (Collins, 2023) or give clarification as to why these are not required in this instance.
- Detail on the suitability of the site for foraging and commuting bats in the report is contradictory.
- Provide details of the surveyor's competency to carry out a BNG assessment.
- Clarification as to why the two ditches mentioned in the PEA and further ditch mentioned in the Flood Risk Assessment and Drainage Strategy are not included in the statutory biodiversity Metric Calculation Tool (SMBCT).

- Strategic significance should be updated accordingly in the metric – this alters the net gain units.
- Please supply the condition assessments for the BNG
- Further information from the applicant regarding off-site BNG – this would include answering the following - is this a registered habitat bank? What is the proximity to the development? Do they wish to enter a S106 to secure the off-site BNG or are they securing it through a conservation covenant with a responsible body?

Further detail

PEA

Bats

Given the presence ‘*several mature trees*’ and the proposed scale and likely impacts of the proposed development we would request that a full GLTA is carried out. Although the trees are understood to be retained there could be indirect impacts on roosting bats (if present) during and after construction. At the construction stage this could include noise, vibration and lighting in proximity to the trees.

Please give further detail on the suitability of the site for foraging and commuting bats as the report is contradictory. The report states ‘*The Site also had high suitability (Collins 2023), for foraging and commuting bats in the tree lines, hedgerows and scrub habitats. Additionally, more field boundaries adjacent to the site provides connectivity to the wider environment*’...this is then contradicted with ‘*The Site was considered to have moderate suitability to support foraging and commuting bats, as the trees and hedgerows had good connectivity to the wider landscape, it is unlikely to be severance of habitat connectivity for bats and therefore further bat activity surveys are considered disproportionate.*’. Does the site have high or moderate suitability for foraging or commuting bats? At the completed development stage there will likely be a reduction in quality of foraging and commuting habitat due to direct habitat loss, habitat fragmentation and indirect effects from increased lighting. For this reason, we would request that bat transect and automated detector surveys are carried out to assess the impact on foraging and commuting bats, or to clarification given as to why these are not required in this instance.

BNG

Surveyor competency

The competency of the surveyor is not demonstrating competency to carry out surveys / a BNG assessment. The competency stated - ‘*Qualifying member of Chartered Institute of Ecology and Environmental Management*’ needs to (as per the CIEEM website) ‘*complete our online application form below and tell us a little bit about yourself, how*

you're involved in the sector, and what plans you have to develop your experience, competence and career in the next few years.' This does not demonstrate that the surveyor has the skills, knowledge and experience to carry out the surveys completed. The 'Statutory Biodiversity Metric User Guide states: *'The first principle is that the metric assessment should be completed by a competent person. A competent person has the knowledge and skills to perform specified tasks to complete and review biodiversity metric calculations. You obtain this through training, qualifications, experience, or a combination of them. Competency is aligned with the British Standard 'Process for designing and implementing biodiversity net gain (BS 8683:202)'*". Please provide a statement of competency that complies with this.

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.

Ditches

The PEA mentions two ditches on-site, however, these have not been included in the statutory biodiversity metric calculation tool (SBMCT) and will need to be or justification given as to why they are not included in the SBMCT e.g. they are likely to retain water for less than 4 months a year. The Flood Risk Assessment and Drainage Strategy mentions 'There is an unnamed ditch located along the northern site boundary', this is not included in the BNG assessment or maps. Please explain why this is not included in the metric calculations – any watercourse within 10m of the boundary should be included in the SBMCT.

BNG Planning Conditions / S106 and Documents Needed to Make a Planning Decision

Please note, requirements may change depending upon how SMDC wish to proceed with securing BNG for outline permissions.

BNG for outline applications is treated as phased development. The submission of the completed metric tool allows us to make comments to aid future decisions. If plans change, a new BNG assessment and plans will need to be completed.

It is unclear whether the developers off site land they wish to use to deliver off-site BNG is already registered as a habitat bank please confirm whether this is the case, and, if so, details of this should be provided. If it is not registered as a habitat bank, please could the applicant provide information on how they wish to legally secure the off-site BNG delivery (habitat bank) – the two mechanisms are a S106 with an LPA or a conservation covenant with a responsible body. It will also need to be registered as a

habitat bank (for a fee) with Natural England. As this is outline, and details of the development such as landscaping have not yet been determined, it is recommended that subsequent approvals are put in place to ensure that any significant on-site and blue line boundary off-site BNG delivery is appropriately secured.

Before a planning decision can be reached, we will need to determine whether the biodiversity gain condition is capable of being discharged and how it is to be secured through subsequent approvals. This may require further detail to be provided which could be a draft HMMP, details of how off-site BNG may be delivered and legally secured and a LEMP.

Survey Longevity

Due to the mobility of animals and the potential for colonisation of the Site, it is recommended that an updated ecological survey be undertaken prior to the redevelopment of this Site should this not occur within 18 months of the date of the field survey (survey dated 26th March 2025).

Conditions

These conditions are based on the information provided to date. As further information is given e.g. the results of bat surveys, they will be added to.

Pre-Commencement Conditions

HMMP

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.

LEMP

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.
- Native floral species, where possible of local origin, be included in the landscaping of the site with a known attraction or benefit to local wildlife over the site and also encourage invertebrates and enhance the site for foraging bats.
- As far as possible, existing trees and hedgerows should be retained as part of the proposal.
- Hedgerows should be managed for wildlife and cut on at least a two-year rotation.
- 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.

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.

CEMP

No development shall take 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).
- Precautionary method statements for [REDACTED], bats, breeding birds, reptiles and hedgehogs
- The location and timing of sensitive works to avoid harm to biodiversity.
- An external nocturnal lighting scheme for 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. The strategy will identify features on site that are particularly sensitive for bats and that are likely to cause disturbance to their resting places, breeding sites and key areas for foraging and commuting and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that area to be lit will not disturb or prevent bats using their territory or having access to their breeding sites and resting places. All external lighting will be installed in accordance this the strategy and shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

- 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.

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. There should be a sign off system to show that construction workers have read and understood the contents of the CEMP.

More Detail on Precautionary Method Statements within the Construction and Ecology Management Plan (CEMP)

In line with the PEA, precautionary method statements included in the CEMP should include, but not be restricted to the following:

██████████

Precautionary measures will include the covering of excavations, capping off open pipes and storing hazardous materials safely.

Reptiles

Precautionary Method Statements should include where possible, stump removal or excavations should be undertaken in the active reptile season (spring/summer/early autumn). This means the ideal time to dig on site is September and October to avoid impacts to breeding birds and reptiles. Where this is not possible an ecologist should be present on site to perform checks immediately prior to works (24hrs).

Where vegetation clearance on the Site is required in spring/summer, the habitats should first be cut to a height of 15-20cm by a hand tool such as brush cutter, progressing at walking pace only. The area should be left for 24-48hrs and then cut to 5cm using the same method, working in the same direction as the previous cut. This will

allow any reptiles present to disperse into the wider environment unharmed. In the unlikely event that a reptile is seen during the works they should be allowed to escape unharmed at their own pace. Only a trained ecologist should attempt to move reptiles by hand. If multiple reptiles are encountered, works should cease, and the methodology be re-evaluated

Breeding Birds

Where possible, vegetation clearance should be minimised and undertaken outside the core bird nesting season (1st March and 31st August, though it should be noted that variation in dates is possible, for example from geographical variations in climate, or due to a particularly mild winter) to avoid damage or destruction of occupied nests or harm to breeding birds. If this cannot be achieved, works within the core bird nesting season will require an inspection of vegetation to be cleared for breeding birds and their occupied nests by a suitably qualified ecologist no more than 24 hours prior to any works being undertaken. If any nesting birds are identified during the survey, they will be left in situ for their entire nesting period and alternative approaches to the work proposed. This may include leaving an exclusion zone around the nests to avoid disturbance.

Biodiversity Features

A pre-commencement condition detailing the number, type and citing of bird boxes and bricks, bat boxes and hedgehog boxes along with installation instructions to be submitted to and agreed by the LPA Ecologist. These should follow the recommendations made in the PEA. Plans should also include details of hedgehog highways.

Conditions

A condition requiring demonstration that the features for biodiversity have been delivered as per the pre-commencement plans agreed for bat, bird and hedgehog boxes along with a hedgehog highway.

A condition demonstrating that the sensitive lighting strategy has been implemented.

Adhere to root protection areas in accordance with BS 5837:2012 for retained trees during construction (as recommended in an Arboriculturists report).