

Biddulph Old Hall SWT Draft Comments

Date: 2nd December 2025

Application Reference: SMD/2023/0108

Location: Biddulph Old Hall

Proposed Development: New access track including replacement bridge and associated visitor parking provision

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.

This is following on from previous comments made regarding this application.

Documents Viewed:

- Emery Planning letter in response to SWT's comments dated 10th December 2024
- Updated application boundary/ location plan
- Biddulph Old Hall, Stoke on Trent, Extended Phase 1 Ecology Survey (updated 2023), Sensible Ecological Survey Solutions Ltd.
- Biodiversity (sic) Net Gain Information Ref 15916A, 18th October 2024, Logika Group
- Biodiversity net gain metric tool, 17th October 2024
- Access Track Layout Drawing M3718-PA-01-V1-1.0, Barnes Walker, 12/2023
- Access Track Layout Drawing M3718-PA-02-V1, Barnes Walker, 12/2023
- Visual Appraisal M3718-VA-10.23-V1, Barnes Walker
- Cut and fill diagram, Nigel Daly Design, August 2022
- Tree Survey Drawing, Cheshire Woodlands, 03 October 2022
- Preliminary Tree Survey Schedule, Cheshire Woodlands 3 October 2022
- Proposed Bridge at Biddulph Old Hall, Plans and Details 6368/220/001 A 17 Jan 2023
- BNG Report- Logika, October 2023 (Updated)
- Biodiversity net gain metric tool- October 2023 (Updated)
- SWT Responses

Summary: We recommend **no objection** subject to the following conditions:

Secure via condition should approval be granted:

- Conditions as detailed for [REDACTED] birds and nocturnal wildlife.
- CEMP, including an Arboricultural Method Statement and method statements for protection of nesting birds [REDACTED]
- Finalised HMMP and net gain plan.

- Condition / S106 detailing how 30 years of management and monitoring of BNG will be secured.
- Detailed drainage scheme.
- Details of bird and bat boxes – pre-commencement condition.

Ecological Survey

The initial Ecological Survey was carried out in November 2023. A further ecological survey was carried out in June 2025; this is considered an optimal time of year to carry out a grassland survey.

Biodiversity Net Gain

With the blue-line enhancements included, there is a net gain of 83.79% in habitat units and 13285.40% in hedgerows.

Removal of Trees

The removal of Tree Group 11 is now being avoided and the two smaller trees T36 and T37, which are going to be removed, are included in the metric.

Watercourse

Our previous comments stated *'Biddulph Brook would be impacted by the construction of a new bridge crossing, and the relevant precautions will be required within a CEMP.*

Opportunities to enhance the brook banks should be taken' and 'A Biodiversity Impact Assessment using the latest Defra metric is required. This will need to include river units as the site includes land within 10m of a watercourse'. The BNG statement states *'No river units were incorporated into the BNG strategy for the site. Although Biddulph Brook is located within 10m of the proposed access track, the new vehicle bridge is replacing an existing river crossing and will be replaced on a like-for like basis, ensuring no impact on the watercourse, with all works confined strictly to the terrestrial environment.'* The riparian zone is 10m either side of the brook, so, although works are confined to the terrestrial environment, the riparian zone is impacted. The Statutory Biodiversity Metric User Guide details exemptions to this, this includes *'established footpaths and existing river crossings'*. As a new bridge is being put in, this is not an existing river crossing. Therefore, if we were bound by current BNG legislation, the BNG assessment would need to include the watercourse and should be carried out by a competent person (MoRPh river assessment trained).

As this is exempt from statutory 10% BNG but still needs to provide a net gain as per the NPPF, we would, as a pragmatic and proportional approach, accept that there are large gains on the site for habitats and hedgerows which could mitigate for any degradation caused by the installation of the new bridge.

Root Protection Areas

It is not clear how close the root protection areas shown on the tree survey drawing are to the proposed track. Clarification should be given that the track avoids the root protection areas in an Arboricultural Method Statement.

Drainage Infrastructure

Our comments dated 8th June 2023 have not been addressed. As this may impact site design and therefore BNG / the HMMP. A more detailed drainage scheme can be conditioned should approval be given.

Post Development Habitat Map

An accurate post development habitat map should be supplied – this can be post decision alongside the HMMP / gain plan, but it is likely that one will need to be drawn to make metric calculations, so this should be provided at the earliest opportunity.

Conditions

Drainage plans are subject to an appropriate planning condition.

In line with the Extended Phase 1 Report, there should be reasonable avoidance measures [REDACTED] to minimise disturbance associated with nocturnal vehicle movements – this would include speed restrictions and the erection [REDACTED] information signs if the Hall is to be open to the general public for functions during nocturnal hours.

In line with the Extended Phase 1 Report, the fencing should be of a design which avoids any restrictions to [REDACTED] movement [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

In line with the Extended Phase 1 Report, it is recommended that the scrub is removed outside the bird breeding season (1st March to 31st August), or alternatively appropriate checks by a suitably qualified person to be completed immediately prior to vegetation removal.

In line with the Extended Phase 1 Report, no static artificial lighting will be erected due to the potential to impact nocturnal wildlife including bats, [REDACTED] and owls. Drivers should be advised to use dipped headlights if using the track and parking area at dusk / night / dawn.

BNG Planning Conditions

Please note that there are significant on-site enhancements delivering BNG and these will need to be secured with a planning condition or S106 agreement with SMDC. This is in addition to a condition of the submission of a HMMP and net gain plan. [There is government guidance on legal agreements for BNG](#). This will need to be agreed and secured 30 years from completion of development of management and monitoring of net gain, therefore it is likely that the schedule for the monitoring of monitoring by SMDC should be agreed prior to consent being given. The agreement will need to detail what is considered completion of the development and the start of the 30 years of management and monitoring.

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 or if the Natural England template is not used, the Natural England checklist 2.0 should be used to ensure all relevant information is included. HMMPs should include:

- 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.

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.
- Any protected species RAM's
- 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.

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.