

Land Adjacent to St Luke's Church SWT Comments

Date: 17.12.2025

Application Reference: SMD/2025/0296

Location: LAND ADJACENT ST LUKES CHURCH , Church Lane , Endon , Staffordshire

Proposed Development: Proposed Change of Use of Agricultural land to form Extension to the Existing Lawn Cemetery on land adjacent to St Luke's Church, Church Lane, Endon, Staffordshire.

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
- ECIA and BNG report- Eyebright Ecology, June 2025
- BNG Metric- June 2025
- Existing Site Plan- Forte Architectural, March 2025.
- Location Plan
- Design and Access Statement- Forte Architectural, June 2025.
- Scheme Proposal- Forte Architectural, March 2025.

Summary: We recommend **no objection** with the below conditions:

Further detail

The application form says the predevelopment biodiversity value of the site is 0- this is incorrect.

BNG

There are significant on-site habitat enhancement and creation. This will need securing with a S106.

The ECIA and BNG report states that off site credits will be used to reach a 10% net gain, details of these will be required at the gain plan stage.

Conditions

Condition or S106 securing 30 years of monitoring of management and monitoring of significant on-site BNG from the completion of development. This should either include approval of the HMMP or specify measures of success and remedial measures if things are not going to plan.

Pre-commencement

A pre-commencement condition detailing the type and citing of bird boxes and bat boxes along with installation instructions to be submitted to and agreed by the LPA Ecologist.

If there is to be any lighting of the site, then an external lighting plan needs to be submitted and agreed by the LPA Ecologist.

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,

This should be submitted to, and approved in writing by, the local planning authority.

Conditions

The table in Section 8.5 (below) and Appendix 4 of the ECIA and BNG report should be followed for RAMs and precautionary working methods for protected species that may be found on the site.

Species	Summary of Findings & Recommendations	Timing
Bats	No roosts likely to be present within the site and no further surveys required. Proposed enhancements: - 2 tree bat boxes in the wider cemetery (2 Schwegler 2F or similar).	During construction

Polecat	Follow Precautionary Working Method Statement (Appendix 4) to carefully excavate rabbit burrows by hand outside of breeding season (Sep/Oct) to avoid potential for harming polecats and avoid unnecessary suffering to rabbits.	Pre construction – Sep / Oct
Hedgehog/Brown hare	Check for hedgehogs and brown hares during removal of vegetation and scrub.	During construction
Birds	Vegetation (hedgerows, scrub) may be used by nesting birds between March to August inclusive. Scrub removal ideally undertaken between October and Feb to minimise risk of encountering active nests. If not, ecologist to check for nests within 24 hours before work in that area commences. Any active nests to be left undisturbed until fledglings have left the nest.	Vegetation removal Oct to Feb or subject to nesting bird checks
	Enhancement of the site by installation of 4 woodstone bird boxes: • 2 cavity bird boxes (32mm hole) on trees • 2 open bird boxes in covered areas (e.g. within ivy on trees or in hedgerows)	During construction
Great crested newt	Low risk of great crested newts on site. Follow Precautionary Working Method Statement (Appendix 4) during vegetation removal / ground works.	During construction