



14th October 2025

RE: BNG Exemption Sheppard Street, Biddulph

Dear Arnold,

I am writing with regards to Proposed Residential Development at The Old School Canteen, Shepherd Street, Biddulph, Stoke on Trent, Staffordshire, ST8 6HZ. The proposals for the site include the clearance of the existing building on site and the construction of five new buildings on site.

A planning application will be submitted for the site, which may trigger a requirement for Biodiversity Net Gain.

Net Gains for Biodiversity

Under the Environment Act 2021, all planning permissions granted in England will have to deliver at least 10% Biodiversity Net Gain (BNG) to be maintained for a period of at least 30 years. The concept seeks measurable improvements for biodiversity by creating or enhancing habitats in association with development.

Mandatory BNG came into force on 12th February 2024 for all developments except exemptions and small sites. The current date is 2nd April 2024 for the introduction of BNG for small sites (residential 1-9 units on a site less than one hectare, or number of dwellings is unknown and the site is less than 0.5 hectare; or for non-residential for floor space less than 1000m² or site less than one hectare). The are exceptions for mandatory BNG, which include developments of less than 25m² habitat or 5m for linear habitats (hedgerows and watercourses), householder applications and small scale self build. If site clearance was conducted under a previous planning consent prior since January 2020 and before August 2023 then the site is exempt from BNG requirement.

The site does not meet the requirements for Mandatory BNG because the entire site comprises of hardstanding, and an existing dilapidated building. The building is constructed from brick, with metal window frames, and wooden doors. The roof beams are constructed from wood, and the roofing material has been removed, leaving the entirety of the building exposed to the elements. The building is completely unsuitable for roosting bats in the current state. The building does offer limited potential for nesting birds, however, due to the exposed nature of the building this is very limited.

There are some areas of ruderal vegetation growing up around the edges of the site, however, this is less than 25m² of habitat in total within the development site boundary. The habitat will be managed until the point of development by spraying the weeds with a non-glyphosate based weed killer. The dead weeds will be removed from the site annually. This will ensure the site does not become colonised by vegetation prior to the proposed development.

Enhancement and Mitigation

All lighting installed as part of the development will be in line with Guidance Note 08/23 Bats and Artificial Lighting at night. The following will be required:

- LED lighting will be used and light levels will be kept as low as possible. Metal halide, fluorescent sources will not be used.
- Lighting will be directed to where it is required and away from retained trees and boundaries.
- Only luminaires with no light output above 90 degrees and/or an upward light ratio of 0% and with good optical control will be used, luminaires will always be mounted on the horizontal, i.e. no upward tilt.
- Any external security lighting will be set on motion-sensors and short (1min) timers.
- Internal lighting within the new rooms will be recessed where installed in proximity to windows to reduce glare and light spill.
- Light sources will emit minimal ultra-violet light, peak higher than 550nm and be of a warm white spectrum (ideally <2700 Kelvin).
- The use of bollard or low-level downward directional luminaires is strongly discouraged.

Enhancements for species will include:

- The provision of nest boxes for bird species such as swift and house sparrow on the walls of the new building will provide permanent nesting for species in decline. Swift boxes have the added benefit of being used often by other non-target species such as house sparrows. The design will include two groups of three integrated swift boxes which can be rendered or brick faced.
- Provision of two bat integrated boxes/bricks, provides new roosting opportunities for the local bat populations. The box/brick will be fitted on south or west facing walls, as close to the eaves as possible. Bat bricks/boxes should not be fitted above or immediately adjacent to windows. These bat boxes are self contained with only a small entrance slot visible on the external wall and can be rendered over or brick faced.
- Any areas to be planted as flowerbeds should include plants that provide good nectar sources for invertebrates such as bees and attract insects which will provide foraging for birds and attract moths for bats. Species include honeysuckle, jasmine, evening primrose, hebe, sedum, night scented stock, lavender, chives, geranium, foxgloves, aquilegia, wallflower and fuchsia.

If you have any questions or queries at any time, please do not hesitate to contact me.

Kind regards,

Liz

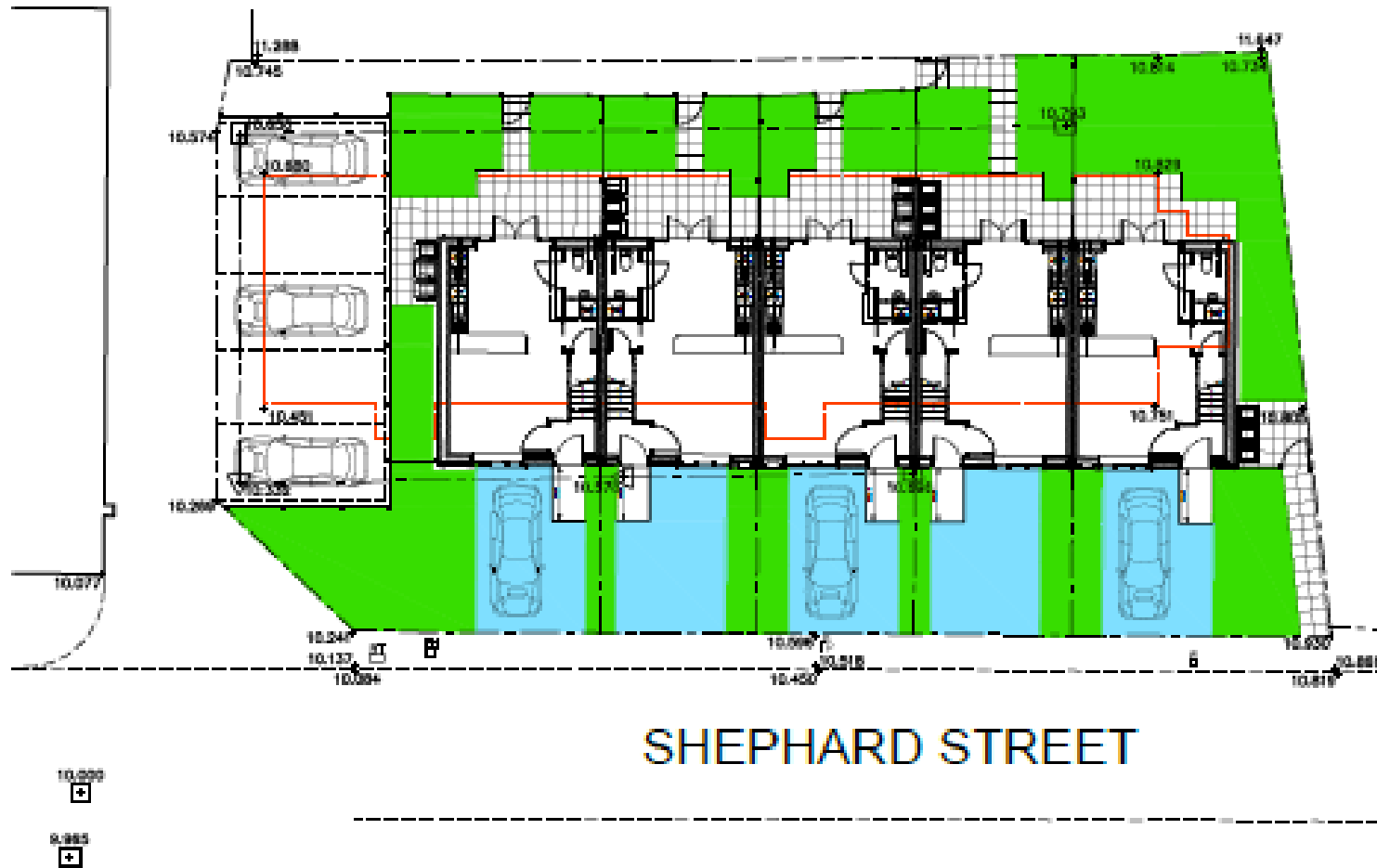
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Proposed site plan



PROPOSED SITE PLAN.

SCALE 1 : 200

Photographs

Photograph 1: General view of site



Photograph 2: General view of site

