

Land Adjacent To Daisy Bank Farm, Uttoxeter Road SWT

Comments

Date: 21st January 2026

Application Reference: DOC/2022/0042 relating to SMD/2018/0509

Location: Land Adjacent To Daisy Bank Farm , Uttoxeter Road

Proposed Development: Outline permission with details of access (all other matters reserved) for residential development of up to 55 dwellings

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 dated 01/07/2022
- Decision notice for SMD/2018/0509
- Extended Phase 1 Habitat Survey, Rachel Hacking Ecology, March 2022
- Ecological Walkover letter, Urban Green, 11th November 2025
- Construction Environmental Management Plan at Daisy Bank Farm, Uttoxeter Road, Upper Tean, Staffordshire, Version 5 16th January 2026, Salboy
- Construction Environmental Management Plan at Daisy Bank Farm, Uttoxeter Road, Upper Tean, Staffordshire, Version 6, 21st January 2026, Salboy

Summary: We recommend that Condition 12 is **discharged** following the receipt of the Construction Environmental Management Plan at Daisy Bank Farm, Uttoxeter Road, Upper Tean, Staffordshire, Version 6, 21st January 2026, Salboy.

For completeness, we have commented on previous comments that we have made below in **red**. In addition, further comments made to the applicant via email have also been addressed.

The new Collington Winter, CEMP needs to be updated in the following areas and signed off by the LPA:

- Risk assessment bought in line with requirements in BS42020:2013. **This is resolved**
- Risk zones to include a scale plan. **This is resolved**

Further detail

Validity of Ecological Survey

CIEEM advice note on the lifespan of ecological reports and surveys, April 2019, states that if a report or survey is more than 3 years old 'The report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated (subject to an assessment by a professional ecologist, as described above)'. Therefore as a minimum an assessment by an Ecologist covering the following needs to be carried out (directly pasted from the advice note):

'A professional ecologist will need to undertake a site visit and may also need to update desk study information (effectively updating the Preliminary Ecological Appraisal) and then review the validity of the report, based on the factors listed below. Some or all of the other ecological surveys may need to be updated. The professional ecologist will need to issue a clear statement, with appropriate justification, on:

- The validity of the report;
- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey(s).

The likelihood of surveys needing to be updated increases with time, and is greater for mobile species or in circumstances where the habitat or its management has changed significantly since the surveys were undertaken. Factors to be considered include (but are not limited to):

- Whether the site supports, or may support, a mobile species which could have moved on to site, or changed its distribution within a site (see scenario 1&2 examples);
- Whether there have been significant changes to the habitats present (and/or the ecological conditions/functions/ecosystem functioning upon which they are dependent) since the surveys were undertaken, including through changes to site management (see scenario 3 example);
- Whether the local distribution of a species in the wider area around a site has changed (or knowledge of it increased), increasing the likelihood of its presence (see scenario 4 example).'

A recent Ecological Walkover letter has been supplied concluding '*the site's habitats remain of low ecological value, with limited suitability for protected species, and mitigation measures should be employed to safeguard identified bat roosting features*'. This is resolved.

DOC in Relation to Condition 12

The Ecological Walkover letter states 'During the 2025 survey, preliminary groundworks were evident in the northwestern part of the site, including earth mounds and vegetation clearance. The previous outbuildings had been demolished'. Therefore there has been a breach of condition 12 as development has started prior to the CEMP

being submitted and approved. We have not received an updated CEMP, so our comments in blue remain unresolved.

Comments directly relating to the condition in blue then later updated in orange below (the condition has been pasted and comments added):

Biodiversity/Ecology

12. No development including site clearance shall take until a Construction Environmental Management plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority (LPA). This must include:

- Risk assessments of potentially damaging construction activities. This is not included. The risk assessment included is not a risk assessment, it is a list of measures that will be taken during construction. See BS42020:2013 – the risk assessment should normally relate to the ECOP. The risk assessment only identifies the risks in terms of ecological constraints; it does not assess all proposed construction type activities likely to impact upon important biodiversity as detailed in BS42020:2013. Whilst useful, it does not fulfil the requirements as detailed in BS42020:2013. This should be updated or added to as per BS42020:2013 – even adding a column with all of the activities that would pose a threat to the risks identified would comply with BS42020:2013. This is resolved, a risk assessment has been produced and is in section 7.1.
- Identification of biodiversity protection zones. This is not included – see BS42020:2013 for detail about what should be included. This is partially resolved – please see 10.4 of BS42020:2013 for details of what should be included. This includes appropriate scale plans. This is partially resolved – a scale plan identifying areas detailed in 10.4 of BS42020:2013 should be included. This is resolved, a plan has been included at the end of the CEMP.
- Practical measures during construction to avoid or reduce impacts during construction (may be provided by method statements). These are not sufficient. Please provide the method statements. Reasonable avoidance measures for the work on T2 included in the Rachel Hacking Ecological Report should be provided within the CEMP. This is resolved.
- The location and timing of sensitive works to avoid harm to biodiversity. This is not included. This included information relating to breeding birds so is resolved. This is resolved.
- Confirmation that there will be no clearance of trees, shrubs, tall ruderal or brambles between 31st March and 31st August inclusive unless a competent ecologist has undertaken a careful detailed check of vegetation for active birds nests, immediately before vegetation removal, and provided written confirmation that no birds will be harmed and/or appropriate methods are in place to protect nesting bird interest on sites. Any such written confirmation should be submitted to the LPA for its written approval before any clearance of trees, shrubs, tall ruderal or brambles. This is not included – noted appendices with some information but this should be in the main body of the document. This is resolved. This is resolved.

- Suitable methodology for the removal of Japanese Rose before any work is undertaken on the hedgerows. Details of the removal of Japanese Rose should be provided prior to the start of construction which will include measures to stop the spread of this species if it is not eradicated before construction starts or evidence should be provided to show that any works started will not spread this schedule 9 species and appropriate biosecurity measures are in place. This is resolved.
- Lighting used during construction to minimise impacts on wildlife. This is not sufficient. This is not resolved, further comments below. This is partially resolved – further comments below. This is resolved
- Open excavations or pipes to be sealed at night. Ramps / planking to be installed to permit wildlife to escape being trapped in structures during construction. This is not included This is resolved. This is partially resolved in the new CEMP – it should be updated to ensure pipes over 150mm diameter are blanked off at the end of each working day. This is resolved
- The role and responsibilities of an ecological clerk of works or similar competent person. This should include measures detailed for works on T2 in relation to bats. This is resolved.
- Disposal of waste material on site. This is included. This is not in the new CEMP by Collington Winter but is in the main updated CEMP.
- Use of protective fences , exclusion barriers and warning signs. We cannot see this included anywhere. This is resolved. This is resolved.

The CEMP shall be implemented and adhered to throughout the construction period strictly in accordance with approved details.

Reason:- In the interests of protected species and habitats during construction

Specific Comments on the CEMP

A new CEMP has been provided, we have the following comments:

1.6 – query as to why Natural Resources Wales are listed for agreeing provisions for controlling, pumping and discharging water when this development is not in Wales. This is resolved, the new CEMP by Collington Winter does not mention NRW.

1.7 Invasive Species - Japanese Rose

Japanese Rose, a Schedule 9 plant species was identified in the original survey and also identified in the Ecological Walkover by Urban Green in November 2025.

The CEMP mentions:

‘Suitable methodology for the removal of Japanese Rose before any work is undertaken on the hedgerows.

- Japanese Rose has been noted in the Habitat Survey. A specialist consultant will be required to provide a survey, method statement and options to remove from site. This is

discussed above, but the method statement provided by the specialist consultant will be adhered to with a validation report provided on completion of the removal of Japanese Rose and haulage tickets attained.’.

Details of how Japanese Rise should be removed (specific methodology and also biosecurity measures to stop the spread) should be submitted prior to the commencement of works to ensure that it is appropriately dealt with and this should be signed off by the LPA. **This is resolved.**

6.1 Ecology – also RAMs for T2 in relation to bats, sensitive lighting scheme (as above) for bats (potential roosts and semi-natural habitats potentially used for commuting and foraging should not be lit) and also potential spread of a Schedule 9 species should all be included. **This is resolved.**

7.1 – does not mention the most recent Ecological Walkover by Urban Green, just the original survey by Rachel Hacking.

Site Lighting - The lighting plan is not made following the industry standard guidance from the ILP and 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 be updated to be suitable for bats and nocturnal wildlife. The site lighting is detailed on p.23. This does not adhere with the industry standard guidance linked to above and should be updated accordingly. The CEMP states that construction will be carried out in daylight hours only. Clarification is required to determine whether there will be any lighting on the site at night e.g. for security purposes, if not then a sensitive lighting plan is not required. This should include measures in the Ecological Management Plan by Rachel Hacking Ecology, 2022

This is partially resolved. The new CEMP by Collington Winter mentions several measures, however the lighting spectrum of security lighting should be below 2700K. and lighting should be on timers as well as sensors. This is resolved in section 4.3.2. of section 7.1.