

Land adjacent to Lakeland Lodges SWT Comments

Date: 11/02/26

Application Reference: SMD/2025/0167

Location: Land adjacent to Lakeland Lodges , Rudyard Road , Rudyard , Staffordshire

Proposed Development: Erection of 4no. dwellings and associated works

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 11/04/25
- Preliminary Ecological Appraisal, Hewitt&Carr, 26/11/25
- Habitat management & Monitoring Plan, Hewitt&Carr, 27/10/25
- Arboricultural statement 9507-AS3, Cheshire Woodlands, 26/3/25
- Amended plans to show amended access, Cheshire Woodlands, 9/5/25
- Tree Survey 9507-SS6, Cheshire Woodlands, 26/3/25
- Site plan amended
- BNG report, Hewitt&Carr, 19/3/25
- BNG report – amended, Hewitt&Carr, 27/10/25

Summary: We recommend a **holding objection** until the following information is supplied and our comments are resolved:

- This application does not meet the minimum validation requirements as stipulated in the Biodiversity Net Gain Planning Practice Guidance. See further detail below.
- Comments are applicable to a development of 4 houses as depicted in ‘Site Plan amended’.
- The BNG boundary in the ‘Site plan amended’ does not match the site boundary in the ‘BNG report-amended’. Please confirm which is the correct boundary for the proposed development and the BNG survey boundary should match this
- The PEA should include impacts on priority habitats within the zone of influence. All Schedule 9 species should be considered.
- This development will result in a loss of connectivity of woodland habitats including ancient woodland. This will need to be mitigated for. This should be evidenced in the PEA.
- There are inconsistencies between the ‘Arboricultural Statement 9507-AS3’ and the PEA. The Arboricultural report references a WW2 bunker which has not been

included in the PEA, as well as rhododendron, a schedule 9 invasive species. Please update the PEA to include these.

- Further habitat and species surveys will be required or justification from a suitably qualified ecologist as to why this is not required. This should include:
 - Breeding bird surveys
 - GLTA, PRA, bat activity surveys
 - Reptile surveys
 - Amphibian (Great Crested Newt) surveys on all ponds within 500m of the site and a consideration of the terrestrial habitats on site.
 - grassland survey at a suitable time of year
- BNG metric and report will need updating taking into account the following:
 - Updated grassland survey at correct time of year
 - Detail as to how the 10% BNG will be delivered eg. Redline boundary, blueline boundary purchase of units.
 - The BNG metric should be for 4 houses (not 9 as it currently is)
 - Include correct information on strategic significance as per [Net Gain Staffordshire Website](#)
There needs to be reference in the PEA to the nearby priority habitats - coastal and floodplain grazing marsh and lowland meadow. And potential impacts on these.
- A hydrological assessment needs to be carried out to assess that impacts on nearby priority habitats. This should include potential for pollution during the construction and operation phases.

Further detail

Application Form

This application does not meet the following requirements as stipulated in the Biodiversity Net Gain Planning Practice Guidance. as follows:

- The date of the pre-development value is earlier than the application date. Please provide evidence for the agreement of this date between the local authority and the individual who will be writing the Biodiversity Gain Plan or alternatively use the application date.
- Clarification is required as to when and what has occurred in terms of degradation of the site. The application form, BNG report, metric (and degradation metric rules followed as per the BNG user guide) and PEA should all be updated to reflect what has happened with regards to degradation of the site.
- The date of publication for the biodiversity metric used is incorrect

PEA

The PEA should include details of Schedule 9 plants found on site.

The PEA should consider priority habitats within the zone of influence of the site.

The PEA should have advised on further survey work required, from the information available, we believe that the following further survey work will be required for us to be able to assess the impact of the development on the species and habitats affected; this is unless a suitably qualified ecologist with the relevant species licences can confirm that this survey work is not required:

- Breeding bird survey (6 surveys and following methodology on birdsurveyguidelines.org)
- Ground level tree assessment for bats (GLTA), preliminary roost assessment (PRA) for any relevant features including the WW2 bunker as well as any surveys recommended as a result of these and consideration as to how bats may use the site. The surrounding area (zone of influence) should also be assessed for potential bat roosts which may be impacted by the development.
- Reptile surveys (x7)
- Amphibian (Great Crested Newt) surveys on all ponds within 500m of the site and a consideration of the terrestrial habitats on site, this should include consideration of the site providing connectivity between terrestrial habitats / hibernation sites and breeding sites.
- A further grassland survey at a suitable time of year will be required that is carried out by a botanist who is at least FISC level 3. The PEA and BNG surveys were conducted at an unsuitable time of year for assessing grassland. The PEA survey was conducted on 12/02/25 and 19/11/25 while the BNG survey took place on 12/02/2025. A grassland survey should be completed from Apr – to end of Oct but ideally between May and Sept. The survey should be carried out prior to any cuts or grazing.

BNG Report and Metric

As stated above the grassland survey should be carried out at a suitable time of year and BNG metric and report updated accordingly.

The area included in the BNG metric and report should match the red line boundary of the development.

Strategic significance on the metric should be included as per Net gain Staffs website or the LNRS (if it has been published).

Degradation needs to be fully accounted for in the report and metric and the BNG statutory metric user guide followed to account for this accordingly.

Details should be provided as to how a 10% biodiversity net gain will be achieved – on-site / off-site / blue line boundary, units etc. Any significant onsite BNG would need to be legally secured through a S106 with SMDC prior to a planning decision being made

Please note that if the applicant wishes to deliver part or all of the 10% BNG on blueline boundary land this will need to be registered as a habitat bank with Natural England and legally secured through either a S106 with a Local Planning Authority or a conservation covenant with a responsible body.

Impacts on Hydrology of Priority Habitats

Please provide a hydrological assessment demonstrating there will be no negative impacts on the nearby priority wetland habitats. This should include impacts of potential runoff of pollutants during and post construction.