

The John Pointon Sport and Recreational Facility SWT

Comments

Date: 17/03/26

Application Reference: SMD/2025/0429

Location: The John Pointon Sport And Recreational Facility , Felthouse Lane

Proposed Development: Removal of existing skateboard park including all equipment, surfacing and fenced enclosure and construction of two Padel courts

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
- BNG, Liz Ecology, 15/09/25
- BNG metric, Liz Ecology, 31/08/25
- Location and block plan, Sammons Architectural Ltd, Sept 2025
- Planning/Heritage and Design & Access Statement, Sammons Architectural Ltd, September 2025

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.
- Further detail will be required in the BNG assessment including
 - Soil testing
 - Evidence that the grassland condition can be achieved and maintained

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 incorrectly stated as the application date. If an earlier date than the application date is used then please provide details as to why this has been used and 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.

- The date of publication for the biodiversity metric used is incorrect

BNG Assessment

- The BNG Assessment states: “Due to the date at which the planning application was granted, mandatory biodiversity net gain set out in the Environment Act was not applicable, as this did not come into force until February 2024 for new planning application.” However the date of the application is 2025, please could this be clarified.
- Soil testing will be required to ensure the site is suitable for the creation of other neutral grassland of moderate condition
- High footfall on this grassland will degrade the quality therefore measures must be in place to ensure the quality can be delivered for 30 years. Please provide evidence that this can be delivered
- To ensure that the BNG is capable of being delivered please could you provide details of the site preparation and the ongoing management. A draft HMMP could be supplied for this but a brief description would be adequate at this stage.

As the BNG is significant onsite BNG the management and monitoring will need to be secured through a planning condition for 30 years and this will require an HMMP in addition to the gain plan.

Conditions

If the application is approved we would recommend that this is subject to the following conditions.

Pre-commencement

Habitat Management and Monitoring Plan (HMMP)

The development shall not commence until a Habitat Management and Monitoring Plan (HMMP), has been submitted to, and approved in writing by, the local planning authority. This should be 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.
- Targets for each monitoring report
- Details of what shall be included in monitoring reports along with remedial measures and when these will be put in place if targets are not being met
- A risk register

The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP, and monitoring reports shall be submitted to Local Planning Authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

Reason: To ensure mandatory biodiversity net gain is delivered as part of the development, in accordance with the requirements of Schedule 7a of the Town and Country Planning Act 1990 (as amended), local plan policy NE1, the National Planning Policy Framework (NPPF) and the national design guide.

Lighting Design Strategy for Light-Sensitive Biodiversity

An external sensitive nocturnal lighting strategy for during and after construction should be secured through a pre-commencement planning condition. The external nocturnal lighting strategy should be designed in line with [the guidance note 08/23 by ILP on Bats and Artificial Lighting at Night](#). The strategy shall:

- a) identify features on site that are particularly sensitive for bats and that are likely to cause disturbance to their roosts in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for instance for foraging,
- b) Cater for other species such as badger and otters that are sensitive to light pollution; and
- c) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: to comply with the Wildlife and Countryside Act 1981 (as amended), Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1. Many species protected by wildlife legislation are active at night (e.g. bats, badgers and otters are sensitive to light pollution. The introduction of artificial light might mean such species are disturbed / discouraged from using their breeding or resting places.