

Werrington Clinic SWT Comments

Date: 20/03/2026

Application Reference: SMD/2025/0504

Location: Werrington Clinic , Salters Close , Werrington , Staffordshire , ST9 0DB

Proposed Development: Existing disused clinic to be demolished and replaced with proposed 5 new bungalows

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
- Ecological Appraisal- Ostara Ecological Services (No Date)
- Existing Block Plan- Daniel Matthias Architecture, November 2024
- Proposed Design- Daniel Matthias Architecture, November 2024
- Proposed Plan and Elevations- Daniel Matthias Architecture, November 2024
- Statutory Metric- November, 2025

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

- We have insufficient information to determine whether the Biodiversity Gain Condition is capable of being discharged. This will need to be determined by the planning case officer when making their decision.
- The minimum BNG validation criteria are not met as per Biodiversity Net Gain Planning Practice Guidance. The application form should be updated.
- More information provided on the suitability of the building to support bats- low or negligible

Please note that we will submit a more detailed planning response including other biodiversity comments once the issues stated above have been resolved. This may include planning conditions.

Further detail

We have viewed aerial photographs, biological records from Staffordshire Ecological Record (SER), mapping on netgainstaffs and information on DEFRA's MAGIC map to inform our response.

Application Form

Minimum Validation Requirements

This application does not meet the following minimum validation requirements as stipulated in the [Biodiversity Net Gain Planning Practice Guidance](#):

- The date of the pre-development value is incorrect, it should be either the date of the application or an earlier proposed date as agreed between the LPA and the person writing the net gain plan. If the date is earlier than the application date, evidence for the agreement of this date between the local authority and the individual who will be writing the Biodiversity Gain Plan should be provided. Alternatively use the application date.
- The date of publication for the biodiversity metric used is incorrect

Metric publication dates:

Listed in the 'version history' tab of the metrics

- Statutory Biodiversity Net Gain Metric
 - 29th November 2023
 - 15th December 2023
 - 12th February 2024
 - 23rd July 2024
 - 3rd July 2025

BNG

Sub-optimal Timing of Grassland Survey

The grassland was surveyed at a sub-optimal time of year for grassland surveys and many indicator species would not have been visible. Grassland should be surveyed between April and October by a very competent botanist but ideally between May and September prior to cuts or intensive grazing.

Is the BNG Condition Capable of being Discharged?

BNG is a material consideration and we have insufficient information to consider whether the Biodiversity Gain Condition is capable of being discharged. To enable us to do this for this application, we require the following information:

Off-site delivery of BNG

- If the BNG is being delivered off-site then some detail on how this may be achieved.
- This will be subject to the net gain condition and a net gain plan will be required.

PEA

Various Species – reasonable precautions suggested

Survey carried out on 11 Nov 2025- The grassland was surveyed at a sub-optimal time of year for grassland surveys and many indicator species would not have been visible.

Grassland should be surveyed between April and October by a very competent botanist but ideally between May and September prior to cuts or intensive grazing.

The PEA recommends reasonable precautions which would be adequate to avoid harm to these species.

A data search wasn't carried out, which would usually be recommended. Upon looking at the results of a data search there is a record of a Great Crested Newt less than 500m from the site. Therefore, RAMs for GCN should be included.

There are inconsistencies with the level of suitability the building has to support bats. In the summary at the start of the report the building has "low" suitability, in the baseline survey section the building has "negligible suitability". This has an important difference as even low suitability buildings are required to have one dusk bat survey carried out on them. Please can the inconsistencies be cleared up.

Bats / Nocturnal Wildlife – Sensitive Lighting Scheme

The PEA recommends that a sensitive lighting scheme should be installed for nocturnal wildlife / bats. This is agreed and will be conditioned – both as a pre-commencement condition for the agreed design and lighting strategy and also pre-occupancy condition demonstrating adherence to the sensitive lighting strategy. A sensitive lighting scheme should be designed with a bat Ecologist and should be designed in line with [the guidance note 08/23 by ILP on Bats and Artificial Lighting at Night](#). Lighting should not shine on semi-natural vegetation or near to potential bat roosts.

Conditions

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

Pre-commencement

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. Lighting should include cowls / hoods or shields, operational timers and use a lighting spectrum below 2700K. The strategy shall:

- a) identify features on site that are particularly sensitive for bats and that are likely to cause disturbance to their roosting 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 badgers 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.

Any subsequent lighting installed upon occupation should adhere to the sensitive lighting strategy.

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.

Reasonable Avoidance Measures

A reasonable avoidance statement should be provided for amphibians, bats, birds, badgers and hedgehogs detailing Reasonable Avoidance Measures (RAMs) for these during any further ground clearance works and construction. These should be in line with the recommendations in the PEAs (Ostara Ecological Services) and BS42020:2013 Biodiversity – code of practice for planning and development. This should include instructions detailing what should be done if a protected species is encountered and measures to avoid entrapment of mammals during construction works. A provision should be made for construction personnel sign to say that they have read, understood and will adhere to this.

Reason: to comply with wildlife legislation including the Wildlife and Countryside Act 1981 (as amended), Biodiversity Duty (NERC Act Section 40), NPPF and local plan policy NE1.

Protection of Breeding Birds During Construction

No removal of hedgerows, trees or shrubs or works to or demolition of buildings or structures that may be used by breeding birds shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared / structure demolished and provided written confirmation that no birds will be harmed and / or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority. If breeding birds or a nest is found, exclusion zones will be put in place as directed by a competent ecologist until after the young have fledged.

Reason: All British birds, their nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife and Countryside Act.

Bat and Bird Boxes

A pre-commencement condition detailing the number, type and citing of bird boxes and bricks, bat boxes and hedgehog boxes along with installation instructions to be submitted to and agreed by the LPA Ecologist. All bat and bird boxes should be made of woodcrete or a similar material to ensure longevity. These should be integrated boxes and places away from any external lighting.

Reason: to comply with wildlife legislation including the Wildlife and Countryside Act 1981 (as amended), Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1, the National Design Guide and Staffordshire Moorlands Design Guide 18 SPD

Site Permeability for Hedgehog

All fences installed as part of the proposed development must include a 13x13 cm gap every 3m at the base of barriers between gardens and around the perimeter of the site so that all garden space is accessible for hedgehog.

Reason: To prevent harm to species of principal importance in accordance with Policy EQ1 of the adopted Core Strategy and the biodiversity duty within the Natural Environment and Rural Communities Act 2006 (as amended).

Biodiversity Measures

As detailed in the PEA and in accordance with the NPPF and Biodiversity Duty, the following measures for biodiversity should be conditioned:

- All trees and shrubs should be native species and of local provenance.
- Fruit bearing trees will be planted
- Any roofing membranes used should not harm bats – if a NBCRM is used, a certificate should be provided that proves the roofing membrane selected has passed a 'snagging propensity test'.

Details of these should be provided along with a location plan before development commences.

Reason: *To comply with the Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1, the National Design Guide and Staffordshire Moorlands Design Guide 18 SPD.*

Conditions

Restriction on occupation of development until specific biodiversity outcomes achieved

The development hereby permitted shall not be occupied until bird boxes, bat boxes and hedgehog highways have been installed / constructed in accordance with details shown biodiversity measures plan.

Reason: *to comply with wildlife legislation including the Wildlife and Countryside Act 1981 (as amended), Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1, the National Design Guide and Staffordshire Moorlands Design Guide 18 SPD*

Restriction on occupation of development until nocturnal lighting plan implemented

The development hereby permitted shall not be occupied until the sensitive lighting plan for occupation / post construction has been installed / constructed in accordance with details shown in the approved Lighting Design Strategy for Light-Sensitive Biodiversity.

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. bat [REDACTED] 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.*