

Land adjacent to Wayfield House SWT Comments

Date: 2nd April 2026

Application Reference: SMD/2025/0440

Location: Land adjacent to Wayfield House Rownall Road, Werrington

Proposed Development: Outline planning application for up to 9 self build plots

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
- PEA July 2025
- Site Plan
- Proposed Site Plan
- Planning Design and Access Statement

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 local plan and NPPF requirement for a net gain in biodiversity is met.
- Please provide evidence that the development is self-build.
- To meet the above the habitats on site should be surveyed using UKHab methodology and habitat information inputted into the u statutory metric to work out the units required to ensure a net gain in biodiversity. Please provide a completed statutory metric calculation tool and condition assessments.
- Please provide evidence that the mitigation hierarchy has been applied and habitats appropriately mitigated for.
- A mitigation plan for reptiles needs to be provided.
- A Mitigation and Enhancements Plan to be provided detailing the location of the mitigation measures.

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. We have not visited the site.

Whilst the exemption to mandatory 10% net gain applies if the project is self-build and involves 9 or fewer dwellings on a site of no more than 0.5 hectares, the development, remains subject to net gain as per local plan and NPPF.

Please provide evidence that the development is self-build.

We have reviewed the PEA and noted that there are suggested net gain measures recommended, which focus on supporting protected species. Given the semi-natural habitats noted in the PEA report, specifically mixed scrub, hedgerows, lines of trees and other neutral grassland, an assessment of the number of biodiversity units being lost should be quantified in a statutory metric. Any gardens should be included as either 'vegetated garden' or 'unvegetated garden' This assessment is required in order to determine whether the measures suggested are sufficient to make a net gain in accordance with the local plan and NPPF. In addition there is no evidence that the mitigation hierarchy has been applied and appropriate mitigation provided for the habitats that will be lost; mitigation provided is for species only.

A ecological enhancements plan may be then required to demonstrate how this net gain will be delivered. If a net gain cannot be delivered on-site, off-site options should be detailed.

It is noted that a data search has not been carried out -this is recommended in the CIEEM guidelines for PEA. Please carry out a data search for protected and priority species or explain why one is not needed.

The PEA indicated that the grassland sward is considered suitable for reptiles and it is possible that they may be present on site (section 3.28 in the PEA report). Mitigation measures for reptiles have been recommended in section 3.28 of the report however they are not provided in section 4 as per the report. Please could reptile mitigation measures be provided.

The PEA refers to a Mitigation and Enhancements Plan (Appendix IV). This is currently missing from the report. Please could this be provided.

Conditions

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 relating to net gain and some of the suggested conditions below may need to be updated.

If the application is approved we would recommend that this is subject to the following conditions in line with the recommendations from the PEA.

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 route 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.

Control of Lighting (hours of use)

The development shall not be externally lit between the hours of 19:00 and 07:00 between March and September inclusive, unless otherwise agreed in writing by 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.

Reasonable Avoidance Measures

A reasonable avoidance statement should be provided for reptiles (as per the PEA section 3.28) detailing Reasonable Avoidance Measures (RAMs) for these during any further ground clearance works and construction and be included in the CEMP if applicable. 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.

Bat and Bird Boxes

A pre-commencement condition detailing the number, type and citing of bird boxes and bricks, bat boxes and hedgehog holes along with installation instructions to be submitted to and agreed by the LPA Ecologist.

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

CEMP

No development shall take place until a Construction Environmental Management plan (CEMP) has been submitted to the local planning authority (LPA) this must include:

- Risk assessments of potentially damaging construction activities.
- Identification of biodiversity protection zones.
- Practical measures during construction to avoid or reduce impacts during construction (may be provided by method statements). This should include the RAMs as detailed in the PEA.
- The location and timing of sensitive works to avoid harm to biodiversity.
- The times during construction works when specialist ecologists need to be present on site to oversee works.
- Responsible persons and lines of communication
- The role and responsibilities of an ecological clerk of works or similar competent person.
- Use of protective fences, exclusion barriers and warning signs.

- Sign off that the CEMP has been read and understood by construction personnel

The CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with approved details, unless otherwise agreed in writing with the LPA.

Site specific inclusions in CEMP:

As detailed in the PEA there is potential for damage to vegetation from construction dust, pollution from stored materials and construction traffic to Priority deciduous woodland habitat in the vicinity. The production of a CEMP including the following measures to protect priority habitats should be conditioned:

- The production and implementation of a Construction Method Statement (CMS) will ensure the Priority woodland, SSSI, LNR and LWS are protected during the proposed development. This will set out detailed methods of construction to avoid impacts to the nearby habitats, as below:
 - Details of how materials / chemicals will be stored and controlled on-site to avoid pollution (for example - all plant will be fitted with drip trays in order to avoid potential pollution incidents and no re-fuelling will take place on the site).
 - Details on the proposed construction methodology including factors such as construction access, methods of construction, timing of work and working hours (particularly after dark when bats may be affected).
 - Construction lighting, if required, will be targeted and focused inwards away from retained vegetation.
 - Dust suppression to protect the nearby high-quality habitats.
 - A fenced buffer zone to protect the existing hedgerow habitats on the boundaries during construction, this will prevent damage and disturbance to nesting birds and dormice (if present).

Reason: To prevent harm to habitats and species, including those offered legal protection from legislation including the Wildlife and Countryside Act 1981 (as amended). Also adhering the requirements of the Biodiversity Duty (Section 40 of the NERC Act), to Local Plan Policy NE1

Biodiversity Measures

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

- Small holes (13 x 13cm) will be left in any fences separating the gardens from adjacent properties to allow hedgehogs to move freely throughout the site.
- The installation of bat bricks/integrated bat boxes within the walls of the new buildings will enhance the habitat for the local bat population. Bat bricks/boxes

should be installed at the eaves on the south or western elevation, away from windows and external light sources. These can be integrated into the cavity wall, brick faced or rendered over with just a small entrance hole visible. There should be at least one bat or brick box installed per house.

- The provision of at least 10 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.
- Both swift and house sparrows are colonial species and therefore the bricks will be fitted in groups with a minimum of three within proximity to each other to form colonies. The provision of groups of swift bricks on site will enhance the habitat for the local bird population. Swift bricks will be fixed no less than two storeys (4.5-5m) above ground level and nest boxes can be sited on any aspect of a building except the southern side (unless shaded by the eaves) to prevent the young becoming heat stressed. Numbers will be agreed once plans are available. Three groups of three swift boxes, and four sparrow terrace boxes, are proposed for the development.
- Installation of bee bricks within the walls of the new buildings (two per unit). Provision of bee bricks can provide excellent alternative habitat for solitary non-stinging bees. These bricks will be erected 1 metre above ground level within the brickwork.

Details of these should be provided along with a location plan including the height and location of any lighting along with installation instructions 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 the bird boxes and bat boxes have been installed / constructed in accordance with details shown in the bat and bird box plan / 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 external sensitive nocturnal lighting strategy for occupation / post construction has been implemented and lighting is 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. 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.