

Gravel Bank Farm, Caverswall

Precautionary Working Method Statement

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Site Details

Report	Precautionary Working Method Statement: Mammals and Amphibians
Site Name	Gravel Bank Farm, Caverswall Common Lane, Caverswall, Staffordshire ST11 9EU
Central OS Grid Reference	SJ 94642 44624
Client	Joanne Bettaney

Document Control

Author	Reviewed By	Comments	Report Version	Date
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Disclosure:

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1 INTRODUCTION

Croft Ecology was commissioned by Joanne Bettaney to prepare a Precautionary Working Method Statement (PWMS) for mammals and amphibians for the proposed construction of up to four bungalows at Gravel Bank Nurseries, Caverswall Common Lane, Caverswall, Staffordshire ST11 9EU (central grid reference: SJ 94642 44624).

Following comments from Staffordshire Wildlife Trust on behalf of Staffordshire Moorlands District Council regarding potential impact to bats that may use the tree in the centre of the Site, received 29 April 2026, an updated Ground Level Tree Assessment (GLTA) was carried out by Croft Ecology to inform updates to this PWMS.

1.1 Purpose and scope

The purpose of this statement is to:

- Provide a method of working to any future contractors working at the Site to minimise any ecological impacts to mammals and amphibians.

The scope of this document is provided by condition 12 of the decision notice from Staffordshire Moorlands District Council in relation to the planning permission SMD/2022/0344 dated 9 September 2022 for the development of 4 bungalows:

12. The development hereby approved shall be undertaken in accordance with method statements for the protection of mammals and amphibians including great crested newts, which shall be submitted to and approved in writing by the local planning authority before the commencement of works.

Reason:- In the interests of the ecological value of the site.

1.2 Baseline information

A baseline habitat survey was undertaken by Apex Ecology Limited in January 2021. The proposed location of the bungalows comprised an area consisting of amenity grassland along with areas of hard standing and two large commercial greenhouses. The Site was bounded by a hedgerow to the west and north, with small parcels of bare ground and beds of introduced shrubs interspersed throughout the site, and a single individual tree.

The Apex Ecology report concluded the following regarding protected species in the 2021 survey effort of the Site:

The majority of the site consists of habitats that are relatively low in botanical value. The hedgerow H2, the introduced shrubs, tree and amenity grassland are low in terms of botanical interest and support an array common species tolerant of a wide range of conditions. However, the hedgerows and introduced shrub do provide connectivity around the site and to the wider landscape.

The feature with the greatest ecological value is the hedgerow H1 on the western boundary. This is classified as a Priority Habitat under the UK Biodiversity Action Plan as it consists predominantly (i.e., 80% or more cover) of at least one woody UK native species. Thus, it is classified as a habitat of Principal Importance under the NERC Act, 2006. The hedgerow forms part of a wider network of hedgerows in the local area connecting to and adjoining other nearby habitats.

The large steel framed workshop and storage shed which is to the east of the site and is to be demolished as part of the proposals is generally well-sealed and does not present opportunities which might be used by bats for roosting. As a result, the building holds negligible potential. The on-site greenhouses similarly offer negligible potential for roosting bats. The walnut tree is semi-mature and also offers no potential for roosting bats.

The data search conducted by Apex Ecology Limited in 2021 returned the following results of GCN:

*Great crested newts *Triturus cristatus* (GCN) have been recorded on 21 occasion within the [1km] search area. The nearest record to site has an indefinite grid reference, is unvalidated and dates from 1984 but lies within circa 500m of the site. All of the remaining GCN records are located at ponds within Parkhall Country Park. The nearest two of these records confirm breeding at a pond at circa 1km to the west of the site. A search of the area has been carried out to determine the presence of nearby waterbodies using OS Explorer map, Google Earth and MAGIC maps. The search revealed that the nearest water body is a pond 55m west of the site. This pond is known to only be present for short periods following prolonged rainfall and was in fact dry at the time of survey. Only one other small pond is shown up to 500m from the site, although several other water bodies are indicated beyond this distance. The site is separated from the pond where the definite GCN record originates by a considerable distance and a busy*

road. With no further records within the search area and the limited suitable habitat on site it is unlikely that GCN will be affected by the proposals.

A review of the Preliminary Ecological Appraisal (PEA) produced by Apex Ecology Limited in February 2021 identified that there was limited potential for great crested newt (GCN) due to the small scale and habitat condition of the Site, although a Habitat Suitability Index (HSI) assessment of the pond 55m west of the Site was not undertaken at that time. It was considered disproportionate to require further surveys for GCN based on the habitats present on Site. The PEA also concluded that the buildings on Site were of negligible potential for roosting bats.

A search of MAGIC undertaken by Croft Ecology in March 2026 confirmed that there were no European Protected Species licences associated with the Site for GCN or bats.

Following the comments from Staffordshire Wildlife Trust on behalf of Staffordshire Moorlands District Council regarding potential impact to bats that may use the tree in the centre of the Site, an updated GLTA was carried out on 11 May 2026 by Croft Ecology. The GLTA confirmed that the tree still supports no features suitable for use by roosting bats. The tree was found to be in overall good health. Some superficial features, such as pruning cuts, lifted bark and knot holes, were present but none of the features lead anywhere or had gaps sufficient enough to support roosting bats.

In line with the Apex findings, no impacts to roosting bats are anticipated however foraging and commuting bats could still use the Site. Therefore, given the presence of common and widespread habitats, and the LPA's request to address potential risks to amphibians and mammals, the PWMS focuses on precautionary measures for species such as GCN (should they be present), other amphibians, terrestrial mammals and foraging and commuting bats.

To support this, the recommendations in this report draw on the Apex Ecology PEA findings, recent photographs of the Site taken in January 2026 (supplied by the architect), and a review of satellite imagery. The recent photographs show that habitats on Site remain similar to those described in 2021, and the assessment has therefore been based on no material habitat change.

2 METHOD OF WORKING

2.1 Responsibilities

The Principal Contractor will be in charge of employing and delegating tasks to appropriate and suitable personnel, meaning those with the correct training and experience for the role. Where there are any queries relating to the implementation of this document, these should be referred to the ecologist for specialist advice.

2.2 Site Storage

Any storage on-Site will be located on areas of bare ground or hard standing.

Materials will be stored neatly, flush to the ground or on pallets, to ensure that refuges for wildlife are not created, to discourage amphibians and small mammals from sheltering underneath them.

Hazardous materials will be stored in accordance with COSHH regulations; no chemicals or liquids will be left open or uncovered overnight. Any re-fueling will take place on an impermeable surface; spill kits will be available for immediate use if required.

All spoil material will be compacted at the end of each day to prevent the formation of cracks or crevices in the soil that could inadvertently provide shelter for small mammals or amphibians.

All waste should be kept in skips or removed from Site as soon as possible to avoid creating new areas of habitat suitable for small mammals or amphibians during the works.

2.3 Protective Fencing

Prior to any works commencing on the Site, tree and hedgerow protection fencing will be installed. The fencing will be installed in accordance with BS5837:2012 (BSI, 2012) but will be extended to include a buffer, where possible, around the central tree and along the western hedgerow to be retained. The fencing must be implemented with professional arboricultural advice to avoid impacts to the root protection areas of the retained tree and hedgerow, and to avoid direct impacts from plant machinery. A Root Protection Zone (RPZ) should be established and marked off prior to works, with no work or storage of materials to be undertaken within

the designated RPZ without the prior agreement of the scheme ecologist and arboriculturist. It is expected that some landscaping work will be required within the protection zones, but again, these should be discussed with the scheme arboriculturist prior to commencement.

2.4 Precautionary Working Methods for Clearance of Ground Cover

The following precautionary methods of work should be followed on Site to avoid and minimise potential impacts to GCN, as well as common amphibians and mammals during clearance of ground cover:

- A toolbox talk should be carried out by an Ecological Clerk of Works (ECoW) prior to any work commencing on Site, to ensure all personnel on Site are aware of the presence of ponds and GCN records in the local area, their legal protection and the requirements to ensure works do not cause disturbance. This mitigation strategy should be available on Site for the duration of the works and a copy present within the Site office for reference by site workers.
- Identification sheets for GCN and common amphibians will be permanently available at the Site office, and all contractors should familiarise themselves with the identification sheets and working practices.
- The hedgerow along the boundaries will be retained and protected within the proposals, as well as the vegetation beyond the boundary. Tree protection fencing will be installed around the boundary vegetation on the Site prior to clearance, in line with BS 5837:2012: Trees in Relation to Design, Demolition and Construction – Recommendations, and left in place for the duration of construction activities.
- The habitat within the Site, must be maintained in its current condition between now and the works commencing to prevent it becoming more suitable for GCN or common amphibians in the interim.
 - Vegetation clearance should take place between March to October as this is within the active period for GCN and avoids the possibility of disturbing hibernating GCN. The temperature must be above 5°C, though the works should be avoided during extended periods of hot, dry weather also when newts may seek shelter in denser vegetation. Should temperatures be forecast to be over 27°C for a period of 5 days, works should be delayed until after this heatwave has passed and newts are likely to be more active.

- The vegetation clearance will be undertaken in a phased directional manner, under direct observation of the ECoW, beginning within the eastern extent of the Site and clearing in a northwest direction towards the retained vegetated habitats outside of the Site extents. This will allow any sheltering individual fauna to disperse and encourage them to enter the adjacent vegetation off-site, undisturbed by works.
- The vegetation outlined for removal should be removed to a height of approximately 150mm using handheld tools (strimmers etc.). No machinery which would impact the ground layer should be used at this stage of the works. The vegetation should then be left untouched for 48 hours to allow any sheltering animals to move out of the way of their own accord.
- Complete clearance of the works area to ground level should then be completed, again in a directional manner, leaving bare ground unsuitable for use by GCN, common amphibians and sheltering terrestrial mammals.
- Arisings from the clearance should not be left within the working area of the Site (unless contained in skips), to avoid creating refuges for wildlife.
- Wherever possible the removal of any debris will be carried out by hand with it being lifted off the ground rather than being dragged. The ECoW will conduct checks for GCN, common amphibians and terrestrial mammals throughout the clearance.
- Any log piles, or other habitat feature that could conceal sheltering fauna, should be dismantled carefully under the supervision of an ecologist.

In the highly unlikely event a GCN is found, the work will be stopped immediately, and a way forward will need to be determined by the scheme ecologist/ECoW in discussion with key stakeholders; this may include a requirement for a mitigation licence, unless an offence can be avoided.

Should the ECoW find any common amphibians (not hibernating), hedgehogs (not hibernating or with young), or other protected species, the ECoW will move them away from the working area, into retained boundary vegetation. In the unlikely event that hibernating animals are found, or a pregnant hedgehog/hedgehog with young, and it is not possible to leave them *in situ*, the ECoW will ensure that the animals are relocated to a suitable hibernacula with minimal intervention or taken into care at an appropriate setting.

If any common amphibians or hedgehogs, or other protected species, are encountered on-Site by the contractors, works in the vicinity will stop, a photo will be taken (to enable confirmation

of ID by the scheme ecologist) and the animal will be allowed to disperse out of the area unharmed. If the animal is in immediate danger, it will be moved carefully, in a gloved hand, to the retained boundary habitat. The Site manager will notify the scheme ecologist at the earliest opportunity, and further advice will be given by the scheme ecologist.

2.5 Sensitive Lighting Strategy

A sensitive lighting strategy is required to avoid lighting impacts to the retained tree and western hedgerow, which could impact foraging and commuting bats that may use the tree and hedgerow, or bats that may be roosting nearby beyond the Site boundary.

During construction, working hours must be limited to daylight hours to avoid impacts on the retained habitats. If works outside of daylight hours are required, measures must be implemented to reduce light spill onto the tree and hedgerow from any security lighting required. For this: heras fencing with opaque, light impermeable sheeting must be installed around the tree and along the western hedgerow. The sheeting will be black or dark green.

No new lighting should be installed along the access track close to the retained tree. Any new lighting (permanent and temporary) within the residential plots, particularly along the Site boundaries and in the immediate vicinity of any bat or bird boxes installed, must be kept to a maximum lux level of 0.5 at 1.5m above ground level to maintain a dark corridor along bat commuting and foraging routes. Any installed lighting should be low-level (ground level or bollard height only), diffused warm LED lights (below 3000 kelvins) fitted with diffusers, shields, hoods, and/or cowls to minimise light spillage, and operated using PIR sensors (motion activators) to ensure that lights do not remain activated when not required. All lighting should be designed in accordance with the Bat Conservation Trust and Institute of Lighting Professionals guidance (BCT & ILP, 2023).

2.6 Reasonable Avoidance Measures During Ground Works and Construction

Contractors should be made aware of the potential presence of protected and notable species including badger, amphibians and hedgehog to pass through the Site and the surrounding area. Whilst the Site is not considered to support populations of terrestrial mammals or amphibians (including GCN), contractors should be made aware of the legal protection for these species.

The Site should be kept clean and tidy overnight to discourage mammals from trying to enter the construction area.

If excavations are left uncovered overnight, they will have gently sloping sides, or scaffold boards will be positioned within them so that terrestrial mammals, such as badger and hedgehog can escape if they fall in.

Any open pipework will be capped overnight so that mammals do not enter and become trapped.

Excavations must be checked by Site personnel first-thing in the morning prior to commencement of works to ensure any trapped fauna can be safely moved before excavation/infilling commences.

There will be no works, or storage of materials, within the hedgerow protection zones, unless agreed in advance with the ecologist.

2.7 Reporting of Incidents/Unexpected Encounters

All Site personnel will inform the Site Manager as soon as possible if any protected or notable species are encountered on-Site, or if there is any damage to retained habitats. The Site Manager will inform the scheme ecologist immediately if any habitats or animals are at immediate risk of harm.

3 REFERENCES

Apex Ecology Limited (2021). Preliminary Ecological Appraisal

British Standard (2012). BS 5837:2012: Trees in relation to design, demolition and construction – Recommendations.

British Standard (2013). BS 42020:2013: Biodiversity. Code of practice for planning and development.

DEFRA (2020) Magic Map Application. Available from:
<http://magic.defra.gov.uk/MagicMap.aspx> [Accessed: 10 03 2026].

4 APPENDICES

Protected Species Legislation

In Britain, the Wildlife and Countryside Act 1981¹ serves as the main tool for safeguarding wildlife. Part 1 of the Wildlife and Countryside Act (WCA) deals with the protection of wildlife, including birds, animals, and plants. The Schedules that hold the most significance in terms of planning are Schedule 1, which protects bird species, Schedule 5, which protects other animal species, and Schedule 8, which protects plant species. Schedule 9 lists species of plants and animals that are not native to Great Britain but have established themselves in the wild, posing a threat to the natural fauna and flora.

Great Crested Newt

All great crested newts *Triturus cristatus* are legally protected in the UK under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and are fully protected under Schedule 2 of The Conservation of Habitats and Species Regulations 2017 (as amended). The latter piece of legislation resulted in them being known as “European protected species”. This means that it is illegal to deliberately take, injure, or kill the animal; to intentionally or recklessly disturb the animal whilst they are in a 'place used for shelter or protection' or damage or destroy a breeding or resting place (even when the animal is not present). It is also illegal to intentionally or recklessly obstruct access to a place of shelter or protection; or to possess, control, sell, or transport live or dead individuals or their body parts. If you cannot avoid disturbing these species or damaging their habitats, you may apply to Natural England for a licence to carry out such works under the close supervision of a licensed ecologist.

Common Amphibians

Common frog *Rana temporaria*, common toad *Bufo bufo*, smooth *Lissotriton vulgaris* and palmate newts *Lissotriton helveticus* are protected from sale only under Section 9(5) of the Wildlife and Countryside Act 1981 (as amended).

¹ Wildlife and Countryside Act 1981

Badger

The Protection of Badgers Act 1992 safeguards badger *Meles meles* and their setts. It is illegal to deliberately harm badgers by capturing, killing, or injuring them, or by damaging, destroying, or blocking access to their setts. Disturbing badgers in their setts, treating them cruelly, intentionally sending a dog into a sett, and baiting or digging for badgers are also prohibited.

Bats

All British bat species (*Rhinolophidae* and *Vespertilionidae*) are legally protected in the UK under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and are fully protected under Schedule 2 of The Conservation of Habitats and Species Regulations 2017 (as amended). The latter piece of legislation resulted in them being known as “European Protected Species”. This means that it is illegal to deliberately take, injure, or kill the animal; to intentionally or recklessly disturb the animal whilst they are in a 'place used for shelter or protection' or damage or destroy a breeding or resting place (even when the animal is not present). It is also illegal to intentionally or recklessly obstruct access to a place of shelter or protection; or to possess, control, sell, or transport live or dead individuals or their body parts. If you cannot avoid disturbing these species or damaging their habitats, you may be required to apply to Natural England for a licence to carry out such works under the close supervision of a licensed ecologist.