



Bombus Ecology Ltd
The White House
50 Mackie Drive
Guisborough
North Yorkshire
TS14 6DJ

Via Email

To Staffordshire Wildlife Trust

19th May 2026

Re: Rebuttal to Staffordshire Wildlife Trusts Letter – Ash Bank Werrington

Dear Sir/Madam

As instructed by Planning Potential we are providing our rebuttal to the original comments received from Staffordshire Wildlife Trust (SWT) about the above development site.

I will address each one of their original comments below.

I am David Pollard BSc (Hons) MRSB Director of Ecology at Bombus Ecology and I am a lifelong naturalist and I have been a professional ecologist/zoologist for over twenty-eight years specialising in wildlife management particularly birds, mammals and reptiles/amphibians. I have Class Level 2 2017-29217-CLS-CLS with respect to bats. I am a Natural England Roost Visitor and a Bat Carer.

Comment 1 – Methodology (UK Habs)

Survey didn't need to be repeated due to the fact the basic habitats are very similar in both circumstances. **We used UK Habs to ascertain the BNG habitats** clearly stated in revised document attached with matrices

Comment 2 – Metric version

Relates to initial confusion on which Matrix was used On the first iteration Small Site Matrix was used but wasn't entirely suitable (because the category poor cannot be used in Small Sites) so in the revised version **the Standard Matrix is used** - it does clearly state on the front page of the matrices the title Small Sites or Standard.

Comment 3 – BNG Unit Figures

This has been completely addressed in the revised document, but it is still unsure where SWT's figures originate/derive from.



Bombus Ecology Ltd
The White House
50 Mackie Drive
Guisborough
North Yorkshire
TS14 6DJ

Comment 4 – Pre-development date earlier than application date

I do not quite understand this comment my survey date will be previous to submission date because you cannot submit without my initial survey I wonder if this is a misunderstanding of key terms by SWT. I carried out my survey on 27th August 2025 and the Full Application was submitted 22nd December 2025

Comment 5 – Publication date of Matrices

Fully addressed within revised documents to be issued – Date was 26th April 2026 it was accessed and the issue date was 29th November 2023

Comment 6 – Competence to complete

Fully addressed within revised documentation – Sarah Woods Bsc (Hons) Msc MRSB – PhD Candidate. One would think there would be a reciprocal respect between professionals about competences.

Comment 7 – Condition Assessments

These will be supplied with the revised BNG documentation

Comment 8 – Hedgerow Species

Does not relate to BNG document – Information contained within the original PEA BRA completed by Bombus Ecology and submitted with the application

Comment 9 – Red line inaccuracies

Fully addressed within revised documentation

Comment 10 – Red line boundary

Fully addressed within revised documentation

Comment 11 – Habitat Classifications

It may be incorrect terminology, but it is the accurate description of the habitat currently on site and this is the biggest problem with UK Habitats – it is Modified Grassland see condition assessment.

Comment 12 – Hedgerow classification conflict

There has been some element of confusion with the main hedgerow down the site boundary in a species poor native hedgerow but there is a tiny patch of non-native *Montbretia Crocosmia* that was wrongly recorded as hedgerow and has now been amended within the revised documentation.



Bombus Ecology Ltd
The White House
50 Mackie Drive
Guisborough
North Yorkshire
TS14 6DJ

Comment 13 – Brick Wall

it is not missing as it is just outside the redline boundary it is private wall that does not belong to our client i.e. we have no influence on it hence it is not included in our calculations.

Comment 14 – Tree Area

They are two individual trees outside the site boundary contained within the wall mentioned above – you use the helper tool with larger and more dense areas of woodland.

Comment 15 – Inconsistent Site Area

Fully dealt with in the revised documentation

Comment 16 – Potential site degradation

It isn't site degradation because stump is old and rotting – possibly at least 20-30 years old. The other issue is its location at the base of the brick wall so it outside the redline boundary

Comment 17 – Proposed Hedgerow Enhancement

Fully dealt with in revised documentation

Comment 18 – Key / legend

Fully dealt with in revised documentation

Comment 19 – NVA Darkest Point

This request relates to new guidelines presented February 2026. I did the survey in August 2025 but have since deleted the photo since time was passed since original survey and the fact the buildings were deemed sub optimal originally – the emergence surveys were only deemed necessary because the buildings were not fully accessible – externally they were both sub optimal for bats – one a large timber framed building with corrugated metal and sides – corrugated metal is sub optimal for bats due to the excessive temperature gradient i.e. either too hot or too cold. The smaller building had no roof void and windows so ambient light will be an issue the brickwork was well appointed thus, a lack of external PRF's – the application also follows a previous application on site where emergence surveys were undertaken, and no evidence of bat use recorded.



Bombus Ecology Ltd
The White House
50 Mackie Drive
Guisborough
North Yorkshire
TS14 6DJ

Comment 20 – Clarification from LPA

in my considerable experience this is not something that happens at this stage we supply our proposed uplift and it is at that point that it is discussed with LPA. With this project I find this request strange given the fact it has already been through the planning system already and we are now working on change to layout rather than a completely new project. During pre-application discussions, it was advised that any application would need to be supported by a metric and this has been completed. It is understood that SWT are the responsible consultee on behalf of the LPA and hence who we seek agreement with at application stage

This site should be recognised for what it is - an **urban site adjacent to a road** with associated infrastructure i.e. street lighting noise etc. – behind site there is large housing estate and a large prison with excessive security lighting.

If you require any further information, please do not hesitate to contact me.

Yours Sincerely

David
David Pollard, BSc (Hons), MRSB
Director of Ecology, Specialist in Herpetology
Email: david@bombusecology.co.uk
Phone: 074494 58612