

Former Anzio Camp SWT Comments

Date: 6th July 2026

Application Reference: SMD/2026/0052

Location: Former Anzio Camp , Buxton Road , Blackshaw Moor , Leek , Staffordshire , ST13 8TL

Proposed Development: Outline permission for redevelopment of the former Anzio site for residential dwellings, retail business, amenity space, internal roads, and associated hard/soft landscaping. Including the principal means of vehicular access from the A53 Buxton Road (all other matters reserved).

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:

- Ecological Walkover, arbtech, 14th October 2025
- Baseline Net Gain Assessment, arbtech, 4th November 2025
- Completed BNG statutory metric tool, Katie Whitfield, 10th November 2025
- Application form

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

- The minimum BNG validation criteria are not met as per Biodiversity Net Gain Planning Practice Guidance. The application form should be updated.
- Application form and BNG unit discrepancy need correcting.
- Please carry out the required bat surveys including site bat activity surveys, emergence surveys and GLTAs on all trees required to be felled and provide the reports. We are unable to assess the impacts of this development within these.
- Please carry out at least 7 reptiles surveys. We are unable to assess the impacts of this development within these.
- A risk to the European sites was identified with the Ecological walkover. The proposal should therefore be screened and possibly subject to Habitats Regulations Assessment. The applicant should provide a shadow HRA to enable the planning authority to undertake this screening / assessment.
- Natural England should be consulted.
- A standard data search for protected and priority species and priority and statutory or non-statutory sites within 2km of the site as a minimum should be requested and the walkover updated in light of the data.

- Please provide details as to whether the Black Poplars will be retained, if not detail mitigation plans for this local BAP species.
- BNG report should cover the whole of the red line boundary – this and the metric should be updated.
- Please supply post development habitat plan, post development metric and details of any available using in Staffordshire that could be purchased to meet the trading rules.
- If significant on-site BNG is to be delivered, please provide a draft HMMP.

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

Application Form

The BNG value on the application form only includes the area habitat units, hedgerow units need to be added to this.

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 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.
- Further detail is required regarding the degradation of the site.
- The date of publication for the biodiversity metric used is incorrect

Metric publication dates are:

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

Walkover

Survey Timing

The grassland survey was at to the end of the survey period for grassland which is April – mid-October; the Phase 1 handbook states the best time for grassland surveys is mid-summer and the survey season ends mid-October. Due to the presence of other neutral grassland, there needs to be some confidence that the site conditions allowed most species likely to be present to be identified. Please either carry out a survey of the grasslands during a more optimal time of year – ideally between May and September – preferably June or July. Alternatively provide a statement of competency for the Ecologist this should include FISC level and be accompanied with a statement from them confirming that they were able to identify enough species to confidently assess the condition of the other neutral grassland.

Data Search

A data search has not been carried out to provide species and local site data. This information is required to fully assess the impacts of this development and the Walkover report should be updated with the results.

Habitat Regulations Assessment (HRA)

Given the application site's close proximity to the Peak District Moors SPA (~1.8km), South Pennine Moors SAC (~1.8km), and Peak District Dales SAC (~2.2km), the development presents the possibility for a Likely Significant Effect (LSE). Consequently, the Local Planning Authority (LPA) cannot legally determine this application without undertaking a formal HRA Screening. We advise that an applicant-submitted Shadow HRA is submitted to enable the LPA to carry out the screening and determine whether an Appropriate Assessment (AA) is required. Natural England should also be consulted.

Species Surveys

Please carry out the required bat surveys including site bat activity surveys, emergence surveys and GLTAs on all trees required to be felled in accordance with Collins2023 guidelines and provide the reports. Please also carry out at least 7 reptile surveys covering all suitable habitat using both transects and refugia checks as per Sewell et al. 2013, Froglife 1999 and Gent and Gibson, 2003. We are unable to assess the impacts of this development within these.

Note on Requiring Protected Species Surveys

Planning permission can be refused if adequate information on protected species is not provided by an applicant, as it will be unable to assess the impacts on the species and thus meet the requirements of the National Planning Policy Framework (2021), ODPM Circular 06/2005 or the Conservation of Habitats and Species Regulations 2017 (as

amended). The Council has the power to request information under Article 4 of the Town and Country (Planning Applications) Regulations 1988 (SI1988.1812) (S3) which covers general information for full applications. CLG 2007 'The validation of planning applications' states that applications should not be registered if there is a requirement for an assessment of the impacts of a development on biodiversity interests.

Section 99 of ODPM Circular 06/2005 states:

"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and / or planning obligations before permission is granted."

As the Ecologists have recommended protected species surveys and a data search has not been carried out, the requested surveys will need to be completed before a decision can be made, and, depending on the results of the data search, further surveys may be required.

Invasive non-native Species

Management Plans will be required for the legal removal of these – these can be conditioned.

Black Poplar

The Black Poplar is a local BAP species. Please provide further information as to whether these will be retained, if they are lost, bespoke mitigation will be required as this species is very rare in Staffordshire.

Species Mitigation

We will comment further once all surveys and suggested mitigation has been provided. As an initial comment, the recommendations for number of bird boxes appear low for the number of potential nesting sites to be lost. The NPPF, government guidance and Local Plan Policy NE1 require biodiversity measures to be provided – detail of these should be supplied.

BNG

The red line boundary for the BNG report is different to the red line boundary for the development. The BNG assessment and metric should cover the same red line boundary as the development. We are unable to provide detailed comments until the whole site has been assessed. We have provided brief comments below:

Please see comments above regarding survey timing – the grassland should be resurveyed at a more optimal time of year or the Ecologist should provide a statement of clarification regarding the ability to confidently identify most of the species that would have been present in June / July.

Please provide a statement of competency for the Ecologist carrying out the survey and assessment.

In the absence of a published LNRS, the Netgainstaffs website should be used to assess strategic significance.

Please assess the plans provided as it appears that the number of trees would meet the UKHab definition for woodland (over 25% cover); if so, the habitat should be inputted into the metric as woodland rather than individual trees.

Please note that the 10% net gain should be in addition to any protected species mitigation. Any protected species mitigation can count towards no net loss but not towards the net gain; the net gain should be in addition to protected species mitigation and should be demonstrated. This is explained in [Government Guidance on what you can count towards a development's biodiversity net gain](#). Therefore the BNG assessment should be undertaken after the requested protected species surveys.

Without a post-development habitat plan and metric and details of how 10% net gain will be achieved we are unable to determine whether the net gain condition is capable of being discharged. Please provide this information.

The applicant should provide evidence that appropriate habitat units to satisfy trading rules are available locally.

If the site is to contain significant on-site habitats, this will need to be secured through a S106 or planning condition. A draft HMMP will be required.

Conditions

We are unable to make suggestions of conditions until the requested information has been supplied.