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RammSanderson Ecology Ltd

West Midlands Office:
1st Floor, Barn 7, Dunston Business Village,
Stafford Road, Stafford, ST18 9FJ

Tel: 01785 562 416

Luke Clarke
CCP Developments (Stone) Limited

Issued by email only

RE: LAND OFF MANIFOLD DRIVE, CHEADLE – BNG LETTER

BACKGROUND

RammSanderson Ecology Ltd (RS) were commissioned by CPC Developments (Stone) Limited to carry out a Biodiversity Impact Assessment (BIA) which included baseline habitat condition assessments and completion of the Statutory Biodiversity Metric. The Biodiversity Impact Assessment looked at the potential impacts upon habitats at land at Manifold Drive, Cheadle for the proposed residential development of 50 houses.

Measurable net gain is a requirement of the National Planning Policy Framework (NPPF) 2024 and the Environment Act 2021. From February 2024, following the introduction of the mandatory biodiversity net gain policy, Staffordshire Moorlands District Council requires a 10% net gain.

METHODOLOGIES

Baseline Habitat Survey

An extended UK Habitat Survey of the site was completed to identify habitats present. All habitats within the site boundary were described and mapped following standard UKHab V2.01 methodology (2023), which categorises habitat type through the identification of individual plant species. Nomenclature follows Stace (Stace, 2010) for vascular plant species and the DAFOR scale for relative abundance was used in the field to determine dominant plants within habitats and communities (D = dominant, A = abundant, F = frequent, O = occasional and R = rare).

Biodiversity Impact Assessment

Outline Procedure

Biodiversity Impact Assessment of proposals was carried out in accordance with guidelines published by DEFRA and via the DEFRA Statutory Biodiversity Metric. The existing value of individual habitats on site is initially calculated by accurately mapping the proposed development site from information collected during a Preliminary Ecological Appraisal and by dividing the land into individual habitat parcels; This part of the work is informed by UK habitats¹ classification systems. The distinctiveness, condition, connectivity and strategic significance of these parcels is then assessed and together with the area of each habitat, a value is assigned. A summary of how habitat distinctiveness, condition assessment, connectivity and strategic significance is determined is detailed within DEFRA best practice literature.

Calculation

¹ UK Habitat Classification Working Group, 2023. UK Habitat Classification – Habitat Definitions V.2 at [ukhab – UK Habitat Classification](https://www.ukhab.org.uk/)



Once the habitat types have been input into the Statutory Biodiversity Metric, along with their area, distinctiveness, condition, connectivity and strategic significance an overall score in biodiversity units is calculated.

Compensation

Once the biodiversity value of existing on-site habitats has been quantified, the value of indicatively proposed habitats to achieve a net gain as part of development must be calculated. This is calculated using the methodology applied above, taking into account the area/length of indicatively proposed habitats, their distinctiveness, condition, connectivity and strategic significance once this is established. A further two parameters are also taken into consideration at this stage. These are the time it will take to reach this target condition and the difficulty of creating/restoring each habitat type proposed. By using these parameters, the calculation takes into account that the time it takes for a habitat to establish may result in a loss of biodiversity for a period of time and also the risk of failure associated with any habitat creation/restoration.

RESULTS

Biodiversity On Site

When assessed against the DEFRA Statutory Biodiversity Metric for biodiversity, the onsite land contains 5.74 baseline biodiversity units for area-based habitats and 3.04 units for hedgerows. There are no watercourses present on site or within 10m of the red line boundary and therefore BNG is not required for watercourse units.

The most distinctive habitat on site is the individual trees, however the modified grassland on site accounts for the majority of biodiversity units due to the area that this habitat covered. The majority of area that the habitats comprised within the Site was of low distinctiveness.

Figure 1: Pre and Post Units – On site

On-site baseline	Habitat units	5.74
	Hedgerow units	3.04
	Watercourse units	0.00
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	4.32
	Hedgerow units	5.50
	Watercourse units	0.00
On-site net change (units & percentage)	Habitat units	-1.42
	Hedgerow units	2.46
	Watercourse units	0.00

Figure 2: Post development Net Change

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-1.42
	Hedgerow units	2.46
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-24.67%
	Hedgerow units	80.79%
	Watercourse units	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

DISCUSSION & RECOMMENDATIONS

The post intervention score for area-based habitats on site is a net loss of -1.42 units (-24.67%), and for hedgerow units a net gain of 2.46 units (80.79%), despite the gain it is not currently meeting trading rules due to the loss of high distinctiveness hedgerow type.

Therefore, to satisfy 10% net gain 1.99 area-based units are required, there are no trading rules linked with the units required as the unit deficit is linked to low distinctiveness habitats only. There is a gain in hedgerow units however the trading rules are not satisfied and as such 1.18 units of 'Species-rich native hedgerow- associated with bank or ditch' are required, as it is a high distinctiveness hedgerow type it's loss must be compensated for with like for like or better, as per the trading rules.

BNG has been considered from the outset for the proposed residential development and incorporated into the masterplan were feasible with the BNG hierarchy adopted throughout. The Site is constrained in terms of BNG delivery within the red line boundary due to the area available and the number of plots that need to be delivered for the development to be feasible. The majority of the Site will fall into developed land and private curtilage which reduces the opportunity to deliver biodiversity enhancements. In addition, space on site is required to deliver practical and required drainage and areas of public open space. It would not be appropriate or feasible to assign habitat creation in areas of public open space as higher distinctiveness habitat types due to the anticipated anthropogenic pressures on these areas, as part of their intended use. As such, these areas have been captured as low distinctiveness modified grassland. It is considered that this is the habitat type that will be realistic for the areas of public space and will be managed as amenity space.

Taking this into consideration, and following BNG hierarchy, the next step is to consider offsite solutions to achieve the required uplift in area-based habitat units and to satisfy trading rules for hedgerow units. There is no hierarchy between delivering offsite units within the developers own blue line boundary or purchase of units from a habitat bank provider. Our client was originally considering both options, however, are now pursuing the route of purchasing units from a habitat bank provider, this route is fixed and final. This will avoid the requirement for a S106 agreement. The purchase of offsite units from a habitat bank provider is considered an acceptable approach and has been accepted by multiple local councils within Staffordshire and nationally.

Quotes have been received from multiple habitat bank providers, with the one below the most favourable with no spatial risk multiplier required as the habitat bank provider is within the Local Planning Authority/National Character Area. A total of five quotes were received from habitat bank providers, showing that there are available units to purchase for this development.

Figure 3: Quotation for offsite units from habitat bank provider

ETP						
	Habitats Lost	# Units	Habitats Supplied	# Units	Price Per Unit	Offset Cost
Area Habitat Grassland						
	Modified grassland	1.99	Other neutral grassland	1.99	£18,700	£37,213
Hedgerows and Treelines Hedgerows						
	Native Species Rich Hedgerow - Associated with bank or ditch	1.176	Native Species Rich Hedgerow with trees	1.176	£18,700	£21,991
	Planning Discharge Pack					£500
Total		3.166		3.166		£59,728

For the purpose of outline planning application approval, the above quote should be acceptable to showcase the mechanism that BNG will be achieved, which is required for planning permission to be granted. The Biodiversity Gain Condition is a post planning condition. As such, it would be deemed inappropriate for our client to have to secure units prior to approval, and this would not be in line with the DEFRA guidance on mandatory BNG.

I trust this is to your satisfaction. Should you have any queries, or require any clarifications, please do not hesitate to call me directly.



Yours sincerely,
Maisie Ryan

Mobile: 07955081350
Email: m.ryan@rammsanderson.com

For and on behalf of RammSanderson Ecology Ltd.