

Land to the Corner of Well Street - SWT Comments

Date: 24/07/2026

Application Reference: SMD/2025/0528

Location: Land to the corner of Well Street , adjoining Robina Drive

Proposed Development: The proposal relates to the construction of 18 dwellings ranging from one bedroom cottage style apartments to 3 bedroom semi detached homes, with all associated landscaping and amenities

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
- Existing Site Plan, John McCall Architects Ltd, Sept 2025
- Proposed Site Layout 1, John McCall Architects Ltd, July 2025
- Extended Phase 1 Habitat Survey (Preliminary Ecological Appraisal), Amenity Tree Care Ltd, 12/12/2025
- Assessment of Biodiversity Baseline, Amenity Tree Care Ltd, 12/12/2025
- The statutory Biodiversity Metric and Condition Assessment, Amenity Tree Care Ltd, 12/12/2025
- Ground Level Tree Assessment, Amenity Tree Care Ltd, 12/12/2025

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

- This application does not meet the minimum validation requirements as stipulated in the Biodiversity Net Gain Planning Practice Guidance.
- Further information is required regarding the PEA report, including
 - the date of survey
 - redline boundary
 - details of how bats may be using the site for foraging and commuting with any proposed mitigation
- Further information regarding the BNG report, including
 - details of the proposed habitats as it is not clear that the mitigation hierarchy has been followed
 - a statement of competency
 - clarification of de-vegetation
 - grassland species list

- clarification as to the number of trees on site
- Details of any proposed SuDS

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

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 is earlier than the application date. Please provide details as to why this has been used and evidence for the agreement of this date between the local authority and the individual who will be writing the Biodiversity Gain Plan or alternatively use the application date.
- The date of publication for the biodiversity metric used is incorrect, please can this be updated
- The pre-development biodiversity onsite value is incorrectly stated on the application form. The value should include habitat, hedgerow and watercourse units which would bring it to a total of 2.34 rather than the stated 2.21, please could the application form be updated with this figure.

Preliminary Ecological Appraisal (PEA)

Please provide details as to how the site may be used for foraging and commuting by bats and, if so, any mitigation is proposed for this.

Clarification is also required as to when the surveys were conducted. The BNG report states a habitat walkover was conducted in July 2025 however the PEA states a survey was conducted in September using the UK Habs methodology.

The BNG and PEA redline boundaries do not match the boundary in the Proposed Site Layout 1, please could the maps be updated.

BNG

Please provide the following further information:

- It is unclear if the mitigation hierarchy has been followed. Further details are required of the proposed onsite habitats including a habitat map and details of any Swift boxes and/or bat and bird tiles/bricks. Significant onsite habitats will need to be legally secured pre-approval. We would also require confirmation of offsite BNG and that this meets the trading standards.
- A statement of competency that demonstrates the skills, knowledge and experience of the surveyor as per BS42020 (BSI, 2013) and the Statutory biodiversity metric: user guide.
- Clarification of the de-vegetation that has occurred adjacent to the residential property (see Condition Assessment – 5B Grassland Low) and whether this constitutes degradation.
- A grassland species list with DAFOR and any available quadrat data along with justification for the classification of modified grassland.
- Clarification as to why there appear to be 6 trees included in the Condition Assessment but only 5 in the metric.

Sustainable Drainage Systems (SuDS)

Please provide details of any Sustainable Drainage Systems (SuDS) proposed and how these might benefit wildlife. These should be considered as per policy SD 5 of the SMDC Local Plan.

Conditions

If the application is approved we would recommend that this is subject to the following conditions however these may be changed or added to in light of further information received.

Pre-commencement

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:

- an invasive non-native species management plan detailing the containment, control and removal of Rhododendron and Cotoneaster on site. The measures shall be carried out strictly in accordance with the approved scheme
- 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).
- 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.
- No clearance of trees, shrubs, tall ruderal or brambles between 31st March and 31st August inclusive unless a competent ecologist has undertaken a careful detailed check of vegetation for active birds nests, immediately before vegetation removal, and provided written confirmation that no birds will be harmed and, or appropriate methods are in place to protect nesting bird interest on sites. Any such written confirmation should be submitted to the LPA.
- Lighting used during construction should minimise impacts on wildlife – this is to be read and signed off by construction workers as part of the CEMP.
- Open excavations or pipes to be sealed at night. Ramps / planking to be installed to permit wildlife to escape being trapped in structures during construction.
- Disposal of waste material on site.
- Pollution protection measures for woodland – reducing dust / runoff
- 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.

Reason: To prevent harm to habitats and species, including those offered legal protection from legislation including the Conservation of Habitats and Species Regulations 2017 (as amended), 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

Reasonable Avoidance Measures

A reasonable avoidance statement should be provided for amphibians, reptiles, birds, badgers and hedgehogs detailing Reasonable Avoidance Measures (RAMs) for these during any further ground clearance works and construction and be included in the CEMP if applicable. These should be in line with the recommendations in the Extended Phase 1 Habitat Survey (Preliminary Ecological Appraisal) and BS42020:2013 Biodiversity – code of practice for planning and development. 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.