

Land at Augustus Way SWT Comments

Date: 27th July 2026

Application Reference: SMD/2026/0188

Location: LAND AT , AUGUSTUS WAY , CHEADLE ,

Proposed Development: Full planning application for residential development including public open space, landscaping and associated infrastructure works
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:

- Post intervention Habitat Map, Ascerta, 09.04.2026
- Landscape Layout, TPM Landscape, 13.03.26
- Landscape Layout (1-5), TPM Landscape, 13.03.26
- Preliminary Ecological Appraisal, Ascerta, March 2026
- Biodiversity Impact Assessment, Ascerta, April 2026
- Arboricultural Impact Assessment, Ascerta, February 2026
- Baseline Habitats, Ascerta, 09/04/2026, P2331.25.E02
- Completed Statutory Biodiversity Metric Tool, Marc Kipling, 8th April 2026
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- Application form
- Include the title, author and date of any reports / plans

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

- The BNG minimum validation requirements have not been met please provide the correct information.
- There are inconsistencies between the statutory biodiversity metric tool and the application form – please correct the incorrect document and update reports etc as appropriate.
- BIA – please include a statement of competency for the surveyor.
- Please carry out a survey of grassland, ditch and waterbody habitats at an appropriate time of year.
- As the riparian zone for the ditch is on the site boundary, this will need to be included in the BNG calculations and a 10% uplift provided
- Please carry out required condition assessments
- Please carry out bat activity (transect and static) and emergence surveys as recommended in the PEA. Any tree with the potential to be a bat roost should be subject to emergence surveys as deemed by its potential to be a roost. These

should be done by licenced bat Ecologists following the BCT survey guidelines (Collins 2023).

- Please carry out both HSIs on all ponds within a 500m radius of the site.
- Please carry out eDNA surveys on all ponds within a 500m radius of the site with suitability for Great Crested Newts.
- Please carry out Water Vole and Otter surveys
- Please carry out 6 x breeding bird surveys as per guidelines or justify why this is not needed.
- Please provide hydrological reports and a drainage plan accounting for climate change impacts demonstrating the impact of the development on Cecilly Brook Nature Reserve and the nearby habitats including the ditch.
- It is not clear from the baseline map in the BIA where the boundary hedgerows are and which are h1-8. Please make this clear.
- Please clarify whether the 90 trees included in the metric tool are in gardens or elsewhere should be classified as woodland (over 25% cover as per UKHab v2.01 or 20% as per UKHab v2.1).
- Trees and hedgerows in gardens should not be entered onto the metric calculation tool – see metric user guide.
- It appears that tree density is such that the grassland ‘meadow’ areas should be mapped as woodland. Please check UKHab definitions for woodland. Also note that trees over ‘other neutral grassland’ will limit the condition that can be reached due to shading and leaf fall.
- Please ensure that the landscape plan and post development habitat maps (both within documents and the separate one provided) are delivering the same habitats (northern edge is either scrub, developed land sealed surface or grassland).
- Please update the BIA map so hedgerows are visible
- The BIA post development habitat map and separate post development habitat map have similar shades of green for symbology of different habitats and also the symbology for the different hedgerow types is also similar making it difficult to decipher which habitats are where – please make the symbology of different habitats different enough so that the type of habitat can be clearly identified.
- Please indicate where hedges 4- 8 are on the plans.
- The metric tool post development habitats should have habitats listed in their final target condition after 30 years, not the initial condition upon establishment.
- We have insufficient information to determine whether the Biodiversity Gain Condition is capable of being discharged. This will need to be determined by the planning case officer when making their decision.

We are unable to comment further on this application until all baseline surveys have been completed and reports submitted; this includes surveying the grassland and

waterbodies at an appropriate time of year. Please note that we will submit a more detailed planning response including other biodiversity comments once the issues stated above have been resolved. We have not commented on documents that will need to be changed in light of survey results and to answer our comments. Further comments may include 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

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 (16.04.2026) 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.
- The date of publication for the biodiversity metric used is incorrect – we have listed the Statutory Biodiversity Net Gain Metric publication dates below:

29th November 2023
15th December 2023
12th February 2024
23rd July 2024
3rd July 2025

There are inconsistencies between the statutory biodiversity metric tool and the application form – please correct the incorrect document:

- The units stated in the application form 14.44 are different to those in the Statutory Biodiversity metric tool – this is the number of area units but there are also 6.53 hedgerow units; please correct.
- The area stated on the Statutory Biodiversity metric tool is 7.09h, whereas the site area on the application form is 5.8ha. Please correct.

BNG – BIA, Metric, Condition Assessments and BIA Map

There is no statement of competence for the person carrying out the BNG assessment. Please provide on as per the first principle listed in the Statutory Metric User Guide.

Comments are limited due to the timing of the survey – this should be repeated at an appropriate time of year. The updated BIA should include justification as to why habitats are classified as they are.

Sub-optimal Timing of Grassland Survey

The grassland was surveyed at a sub-optimal time of year for grassland surveys (November) and many indicator species would not have been visible. Grassland should be surveyed between April and October by a very competent botanist but ideally between May and September prior to cuts or intensive grazing. Please re-survey the grassland at a suitable time of year. Please provide a species list preferably with DAFOR and justification for the habitat classification.

Sub-optimal Timing of Pond Survey

A lot of pond plants are only visible in the summer, therefore these should be surveyed at a more suitable time of year – the Phase one handbook recommends between mid-June and the end of September.

Ditch Survey

The riparian zone for a ditch is 5m, the ditch is 5m outside the site so the riparian zone touches the site boundary. This will require a 10% biodiversity net gain and a condition assessment should be completed and this should be included in the BNG metric.

Baseline Habitat Map

Baseline Map BIA - hedgerows are hidden under the boundary and it is unclear where these are. Please label each of the hedgerows listed in the metric H1-8). There is differentiation with 3 types of hedgerows in the key but all appear to have the same symbology so these cannot be distinguished on the map. Please update.

Baseline map – PEA - Please label the hedges so it is clear which are H1-H8.

Hedgerow Map (within BIA)

This map is difficult to read, we can only make out H1, H2 and H3, please make it clear where all of the 8 hedges listed in the metric are. It is unclear what G1 is referring to.

Please make it clear where H7 and H8 listed in the metric baseline are.

Metric

Habitat significance should be determined using the netgainstaffs website, please update the metric and report as necessary.

The metric contains 8 hedgerows in the baseline, the BIA mentions 7 in table 3.2. The maps with hedgerows labelled at the end of the BIA shows 6. Please clarify and correct the incorrect documents.

Condition Assessments

The user guide states that a condition assessment should be done for ditches. The supplied condition assessment has not been filled in for ditches.

Six trees have had a condition assessment completed, G1, 3, 4, 6, 7 and 8 please explain why other trees have not had their condition assessed. Only one hedgerow has a completed condition assessment, depending on which document you read, there are between 6 and 8 hedgerows – all should have a condition assessment. There is only 1 scrub condition assessment but there are 4 lines of scrub on the metric. There is only 1 condition assessment for modified grassland but 3 lines for this on the metric and there appear to be 4 fields on the aerial photo – please provide an explanation. There is no condition assessment for the 2 ponds in the metric.

Post Development Habitats

Please provide further clarification of where the 90 trees will be planted. As per BNG User Guide, trees, introduced shrub and hedgerows in gardens cannot be counted individually and should be part of the 'vegetated gardens' – only those outside of gardens can be included as individual trees or hedges. Any habitats within a garden can only be 'vegetated garden' or 'unvegetated garden' as per the BNG user guide. If hedgerows and trees in gardens are included in the post-development metric calculations, these will need to be removed.

Please also use the UKHab definitions to determine whether the trees should be classified as woodland i.e. over 25% canopy cover for v2.01 and over 20% cover (including clumps of more than 5 trees and lines of trees) for v2.1 – it appears that all of the 'meadows' should actually be mapped as woodland due to tree density (taking a worst case scenario, trees cover for small trees is calculated as 0.3664 ha (these will grow) and other neutral grassland and modified grassland totals 1.051; this is over 25% tree cover and certainly will be where trees are concentrated over areas of grassland). Please update metric and report accordingly. Please note trees planted over other neutral grassland will limit the condition that can be reached due to shading and leaf fall and this should be taken into consideration when preparing the HMMP, metric and other documents relating to the delivery of BNG. Please ensure any trees in scrub are clearly identified so that they are managed as trees not scrub. Please explain what the 'Area for land used for BNG' contains in regards to habitat provided. The very similar shades of green on the post intervention map, also make this difficult to distinguish.

In the BIA, the landscape plan and post developments habitat plan appear to be slightly different – there is scrub in the north of the proposed habitats map, whereas this is possibly a meadow in the landscape plan. In addition, in this area, the Post Development Habitat map provided separately appears to have developed land sealed surface. All post development plans should have the same habitats planned.

The BIA states '*These grassland areas are assessed as being in poor condition at the point of creation, reflecting their establishment stage and the time required for species-rich swards to develop under appropriate management.*'. The metric tool accounts for the time it takes to create habitats in the condition stated. From this statement, it is unclear what the final condition is intended – currently it is assumed that this is poor but the statement suggests it may be different. The aspired condition after 30 years should be input into the metric tool and this will automatically assign a time to target condition to reflect how long it may take to create or enhance habitats to the aspired condition (in the case of this other neutral grassland 2 years to poor condition and 10 to good condition).

Please input desired final conditions for all habitats into the metric tool as it will automatically calculate the time to target condition. In addition, the HMMP monitoring should reflect this with targets set for each monitoring year and remedial measures for if these targets are not being met.

Is the BNG Condition Capable of being Discharged?

BNG is a material consideration and we have insufficient information to consider whether the Biodiversity Gain Condition is capable of being discharged. To enable us to do this for this application, please, respond to our queries above and, in addition, provide the following information:

Significant On-site Habitats

- Soil test showing conditions are suitable for creation of grassland if other neutral grassland is being created where there was modified grassland.
- Detail in the LEMP of the creation of suitable ground conditions for the habitats you are creating – or these should be included in the HMMP
- Please ensure that trading rules are met.
- Draft HMMP detailing management to create desired habitat, habitat and time-specific targets and ways to measure if these are met, timings of when you would expect to see certain conditions and remedial measures for if things do not go to plan
- You may wish to submit a draft Biodiversity Gain Plan to provide evidence that the trading rules / net gain hierarchy etc have been met
- Draft post development BNG metric and habitat plan

A condition or S106 will be needed to secure the monitoring of 30 years of management and monitoring after the development has finished. This needs to be agreed with the LPA prior to determination. This condition or S106 agreement should either include the approval of the HMMP or this could be approved in a separate condition. Ideally this should include measures of success and remedial measures if things are not going to plan. We would need to see details of this to determine whether enough measures are in place to ensure that at least 10% BNG is delivered 30 years after development has finished.

We would recommend that you should consider whether the Biodiversity Gain Condition is capable of being discharged when creating the HMMP, as, if the Biodiversity Gain Condition cannot be discharged and changes need to be made to any plans, the HMMP may need to be adjusted to accommodate this.

Post Intervention Habitat Map – Provided Separately (not in BIA)

There appear to be a lot of trees delivered on top of grassland. If there is over 25% (using UKHab v2.01 as this application predates version 2.1) canopy cover (as per tree calculator) then this should be inputted as woodland habitat rather than grassland. Care should be taken when planting trees over grassland as it will cause shade and leaf fall will cause a build-up of nutrients which is not compatible with species rich grasslands.

It is difficult to distinguish which area relates to which habitat as a lot of similar shades of green and similar browns for hedgerows are used. Please find a way to make it clear which habitat is where to enable is to comment.

SuDS

Please provide details of SuDS features that benefit wildlife.

PEA

The walkover survey was carried out at an inappropriate time of year for grassland and waterbody surveys. Please repeat grassland at an optimal time of year – ideally between May and September and ponds in the summer. The Handbook for Phase 1 Habitat Survey: A Technique for Environmental Audit (JNCC, 2010) recommend grasslands are surveyed in mid-summer and ponds are surveyed between mid-June and the end of September. Government guidance also recommends surveys for vascular plants in Spring or Summer. In addition, plant species may have been missed in other habitats due to the timing of the survey.

HSI

Please confirm whether all ponds within 500m were assessed. Distances for the site of the ponds surveyed are not mentioned.

Impact on Other Sites

Please provide a hydrology report and drainage plans accounting for future impact due to climate change, so that the impact on nearby habitats and sites important for wildlife - including Cecilly Brook Nature Reserve, which is connected to the site through watercourses and the ditch - can be properly assessed. Please provide details as to how the impact on Cecilly Brook Nature Reserve and the ditch will be reduced.

Further Species Surveys Required

The PEA recommends bat activity surveys through transects and static recorders and emergence surveys on trees identified in Section 5, we cannot comment on the application until these have been carried out. These should be carried out in accordance with the bat survey guidelines (Collins, 2023).

Please carry out Great Crested Newt eDNA surveys on all ponds within a 500m radius of the site.

At least 2 Water Voles surveys are recommended – we cannot comment on the application until these have been carried out.

The PEA appears to suggest that the site is suitable for Otters. It is unclear whether Otter surveys have been carried out as per guidelines (Chanin, 2003) as the recommendation is only for one Otter check. Otters are protected and, if a resting place is identified within 30m of the site, this will require mitigation and possibly a licence. Please provide further detail as to whether the request for a survey is to carry out a thorough search for Otter signs, resting places and holts that may be impacted – or Otters access to these impacted – by the development. In addition, the standard government guidance states that Otter surveys will be required if “a development will affect habitats near a water body directly or through environmental effects, such as creating noise or light”. This guidance can be found here: <https://www.gov.uk/guidance/otters-advice-for-making-planning-decisions>. It appears that this will be the case and further clarification on the level of Otter surveys required from the ecologist is requested.

Breeding bird surveys have not been carried out. These should be carried out in accordance with birdsurveyguidelines.org – this is at least 6 surveys at the appropriate time of year or justification provided as to why this is not required.

Badgers – pre-survey check and RAMs to be conditioned

Invertebrates – RAMs required.

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.”

HMMP

We have not looked at the HMMP as we need to be sure of the baseline and post intervention habitats and see the results of soil tests before we can assess whether this is appropriate.

CEMP

We have not looked at the CEMP as we need to fully understand the potential ecological impacts before we can consider this.

Biodiversity Gain Plan

We have not looked at the Net Gain Plan as we need to have the baseline surveyed at the correct time of year and our other BNG comments addressed before we can consider this.

Planting Plans

We have not looked at these and will do once the completed surveys have been submitted.

Conditions

We will suggest conditions once sufficient ecological information has been supplied from surveys following official guidelines that allow us to fully consider the ecological impacts.