

Megan Wilson  
Marrons  
Cubo  
38 Carver Street  
Sheffield  
S1 4FS

11/11/2025  
Your Ref: 09209  
Our Ref: 24/02108/OUT

Dear Megan,

## Response to County Ecologist's Comments on Planning Application 24/02108/OUT – Albrighton South

Please find below a detailed breakdown of the County Ecologist's comments, as provided in their correspondence dated 30th October 2025. Each comment has been presented as an individual point, followed by our corresponding response to ensure clarity and address all matters raised in a structured manner.

### Point 1: Biodiversity Net Gain – River Condition Assessment

*I have read the Biodiversity Net Gain Report (PJA, August 2025) and most up to date BNG metric.*

#### **River condition assessment**

*The User Guide states that:*

*Watercourse habitat types use different methodologies to assess condition, for:*

- *culverts – you do not need a condition assessment*
- *ditches – you should use biodiversity metric condition sheets*
- *all other watercourses (including canals) – you should conduct a river condition assessment (RCA)*

*You should be a qualified RCA assessor to conduct a river condition assessment.*

*The on-site watercourse baseline includes 'Other rivers and streams', therefore a river condition assessment and confirmation that the surveyor is accredited is required to support the application.*

The Condition Assessment Sheets were updated on 3 July 2025, one of the amendments was the addition of the RCA Datasheet. Therefore, we would like to notify the SC Ecologist that the River Condition Assessment (RCA) has already been submitted as part of the Condition Assessment Sheets, "STATUTORY\_BIODIVERSITY\_METRIC\_CONDITION\_ASSESSMENT" - RCA Datasheet.

Following protocol by Gurnell et al. (2020) the water course is classified as ‘other’ with the Morph module length set at 10m stretches (5 modules in a subreach). As the length was approx. 0.2km to get to 20% of the river length one morph subreach was measured. Most of the water course was dry at time of survey with a series of pools all that remained focussed around a culvert under a driveway.

We would be grateful if the county ecologist could confirm whether any further information is required. Once confirmed, we will be happy to proceed with the submission.

We would also like to notify the SC Ecologist that information for the qualified RCA assessor was submitted as part of the BNG report “BIODIVERSITY NET GAIN REPORT “, paragraph 2.5.4 (please see below extract from the report):

*“2.5.4 The validating site visit and River Condition Assessment (RCA) was undertaken by Phil Playford BSc (Hons), MSc, MCIEEM, MRSB. Phil is an experienced ecological surveyor with strong specialist skills in botany, supported by formal academic qualifications and professional memberships. He has extensive experience in habitat identification, habitat classification, and is certified to conduct Modular River Physical (MoRPh) surveys as part of the RCA inputs for calculating Net Gain for rivers, streams and canals using the SBM”.*

Although this information was included in the already submitted report, we are submitting the assessor’s certificate. We would be grateful if the county ecologist could confirm whether any further information is required. Once confirmed, we will be happy to proceed with the submission.

## Point 2: Biodiversity Net Gain – Watercourse enhancement

### What enhancements are proposed to the watercourse?

This information has already been submitted in the Statutory Biodiversity Metric (relevant baseline and post-intervention tabs for WC-OR01).

We followed a conservative approach (as the planning application is outline), no changes have been made to the condition of any watercourses for this development. All conditions remain as assessed in the baseline. However, for WC-OR01 the riparian encroachment has changed from moderate-moderate at the baseline (please Figure 1 below, extract of baseline map C (already submitted)) to moderate-minor in development due to the design proposals (please Figure 2 below, development map C (already submitted)).

The riparian encroachment change due to design proposals, applied to the relevant section of the watercourse, contributed to the 13% uplift in units. Moderate to minor riparian encroachment changes is due to the change in land use adjacent to the watercourse going from agricultural (moderate in line with

guidance) to the southern section highlighted in Blue (Figure 2) to grassland and no development resulting in minor encroachment (in line with guidance).

For avoidance of doubt, guidance states that a watercourse is enhanced where the project interventions promote natural function, processes and the development of natural habitats. Examples include:

- Removing culverts
- Restoring natural alignment
- Enhancing the riparian zone
- Removal of encroachment features
- Removal of tidal structures and restoration of tidal processes.



Figure 1: Extract from Baseline Map C



Figure 2: Extract from Development Map C

### Point 3: Biodiversity Net Gain – S106 and monitoring fee

Notwithstanding the above, the BNG is significant and will require a s106. In April 2025 I stated that the monitoring fee would be £45,741.39 (for a large site of high technical difficulty). However, since then we have updated our monitoring fees and the fee will actually be £41,227.55.

Noted.

#### Point 4: Great Crested Newts

*The Great Crested Newt eDNA Survey (Cass, June 2024) has confirmed the presence of GCNs within an on-site pond and an off-site pond.*

*The letter from PJA (dated August 2025) states that the development will join the District Level Licensing scheme. To allow SC Ecology to complete the 'favourable conservation status' of the Habitats Regulations '3 tests', a countersigned Impact Assessment and Conservation Payment Certificate needs to be submitted.*

Boningale Developments Limited have submitted the form to Natural England to join the District Level Licensing scheme. Once the IACPC is countersigned, it will be submitted to the SC Ecologist.

#### Point 5: Bats

*Sections 5.13 of the Preliminary Ecological Appraisal Report (Cass, April 2024) states '[I]t is recommended that bat activity surveys are undertaken to further determine the value of the site to bats and determine how bats are using the site.' These need to be submitted in support of the planning application.*

*Section 5.15 states that 'The mature trees on the site may contain potential roosting features for bats. If these are to be directly affected by the development proposals, further bat tree assessment surveys should be undertaken to fully assess their suitability for roosting bats'. Confirmation that the mature trees won't be directly impacted, or further survey work, are required.*

Bat activities surveys were undertaken in October 2025, we are currently analysing the results. The results will be forwarded to the SC Ecologist.

Regarding potential roosting features, the 18 individual trees and woodland plots will not be directly affected by the development proposals. Trees within hedgerows will be subject to ground level tree assessments in December 2025. The outcome of these surveys will dictate further survey and / or licensing requirements (if needed). The results will be forwarded to the SC Ecologist.

#### Point 6: Breeding birds and Point 7: Wintering birds

*Section 5.22 of the Preliminary Ecological Appraisal Report (Cass, April 2024) states 'Given the presence and habitat suitability for breeding species of conservation concern (such as skylark), a breeding bird survey is recommended to determine the likely effect of the development proposals on birds. This survey should be undertaken between March and July.' These need to be submitted in support of the planning application.*

*Should any ground-nesting bird territories be present, areas of the site will need to be set aside as mitigation/compensation land.*

*The Wintering Bird Survey Report (Beamsley Ecology, June 2025) states that 'It is assessed likely that ... skylarks will be negatively affected at a 'Local' level.' 'At the point of a detailed planning application when detailed proposals are available, the data presented herein should inform an Ecological Impact Assessment (EclA) to assess the likely residual impacts on wintering birds during construction and operational phases of the development.' This assessment is required to support the planning application.*

Breeding bird surveys will be completed between March and July 2026 and the results will be forwarded to the SC Ecologist.

We appreciate that the SC Ecologist needs confidence on the assessments. At construction stage, impacts are anticipated due to noise and vibration from construction activities. There is also potential impact from loss of nesting and foraging habitat and potential disturbance of active nests. A Construction Environmental Management Plan (CEMP) will be in place. The CEMP will entail working methods, timing of works, ecological clerk of works and buffering requirements to ensure any potential impacts to nesting birds during construction are considered and mitigated appropriately.

At operational stage impacts are anticipated due to loss of open crop fields, habitats suitable for breeding and foraging. Increased levels of lighting and human presence might further result to lower habitat suitability for certain local farmland bird species.

The wintering bird report as well as the desk study review has provided us with an anticipation of species expected to be using the site. As progressing through to detailed proposals, and with further survey information becoming available (in the form of the breeding bird surveys), the mitigation proposed will be adapted accordingly.

The onsite design is a wildlife sympathetic design, with addition of water features and good quality grassland further enhancing nesting bird habitat opportunities. However, Boningale Developments Ltd has confirmed that there is further land under their control that is available if additional mitigation is required. Whilst the detailed breeding bird surveys will further inform the mitigation proposals, at outline stage and for a phased development, the retained habitats within the site, the proposed onsite habitat creation, and the availability of further land for mitigation purposes, which will be subject to surveys to understand carrying capacity, should provide the SC Ecologist the confidence that any potential impacts could be suitably mitigated.

## **Point 8: Conditioning survey work**

*Baseline survey data is required to support a planning application. We will only condition initial survey work under exceptional circumstances. Up-to-date surveys are often conditioned for developments that will take place over a number of years (e.g. phased), or where there are delays in the commencement of development.*

With the exception of breeding bird surveys that will be completed in spring 2026 and potential further surveys required for bats (pending analysis of survey results that will establish site suitability and potential presence of roosting features on hedgerow trees), baseline surveys for this proposal have been completed.

**Point 9: Other species**

*I am happy with the White-clawed Crayfish Survey Report (PJA, October 2025) and the Reptile Survey Report (PJA, September 2025). No additional survey work is required.*

Noted.

Yours faithfully

**Ana Togridou CEng MCIEEM, Nicole King ACIEEM and Stuart Graham CEnv CEcol MCIEEM**

CC. Dean Trowbridge