



Summary of Staffordshire Wildlife Trust's Response to the Stoke-on-Trent Local Plan

Staffordshire Wildlife Trust has submitted a formal response to the Regulation 19 draft of the Stoke-on-Trent Local Plan. While welcoming several improvements since the previous consultation, the Trust considers that important issues remain and that the plan is currently unsound and, in some respects, legally non-compliant.

Changes Welcomed

The Trust welcomes a number of positive changes, including:

- The use of the term "green and blue infrastructure".
- Support for re-naturalising the River Trent and its tributaries.
- Stronger support for habitat enhancement and reference to the Local Nature Recovery Strategy.
- An increase in the tree replacement ratio from 1:1 to 3:1.
- Recognition of ancient woodland and other irreplaceable tree habitats.

Key Concerns

1. Biodiversity Monitoring and Legal Mechanisms

Policy NA3 is missing from the formal Monitoring Framework. The Trust considers that the plan needs clear indicators to monitor ecological survey and Biodiversity Net Gain compliance, the condition of important wildlife sites, and longer-term impacts on protected and priority species.

The Trust also raises concerns about the proposed use of conservation covenants, arguing that the Council may not be able to rely on these unless formally registered to do so. It recommends using planning conditions and Section 106 agreements to secure long-term ecological management.





2. Gaps in Biodiversity Policy

The Trust identifies several areas where policy wording needs strengthening:

- Exempt developments should still demonstrate a biodiversity gain through an appropriate simplified approach.
- The distinction between the statutory BNG Gain Hierarchy and the NPPF Mitigation Hierarchy should be made clearer.
- Ancient woodland and ancient or veteran trees should have a minimum 15-metre semi-natural buffer from development.
- Development affecting Local Wildlife Sites should comply with national BNG trading rules.
- Lighting assessments should protect wildlife corridors and nocturnal species from harmful light pollution.
- Sustainable drainage systems should, where feasible, also provide biodiversity benefits and support the Nature Recovery Network.

The Trust also considers that the plan needs to better address indirect impacts on wildlife outside development boundaries, such as changes to drainage, lighting, pollution and recreational pressure.

Brownfield Land and Ecological Evidence

While supporting the principle of making effective use of brownfield land, the Trust points out that previously developed sites can contain valuable Open Mosaic Habitats, particularly for rare and protected invertebrates. It therefore wants specialist surveys to be required where appropriate before relevant sites are allocated or developed.

Policies Map

The Trust considers that the Policies Map is based on an incomplete evidence base because there is no formal data-sharing agreement with the Local Biological Records Centre.

It also argues that the map should do more than show existing designated wildlife sites. It should identify the wider Nature Recovery Network, including ecological corridors, stepping stones and landscape-scale opportunity areas, to help guide future development and nature recovery.





Individual Sites and Greenfield Development

The Trust has not commented on individual site allocations, including sites such as H58 at Packmoor and BL12, nor has it sought to assess individual greenfield sites through this representation. This does not mean that the ecological impacts of development on these sites are being disregarded.

Rather, the Trust's focus is on ensuring that the overarching policies, evidence base and monitoring framework are strong enough to ensure that wildlife and important habitats are identified and properly protected, avoided or mitigated wherever development takes place. Getting these policies right will provide the framework needed to assess individual sites effectively and to ensure that development contributes to, rather than undermines, the wider Nature Recovery Network.

Overall Position

In summary, Staffordshire Wildlife Trust welcomes a number of improvements but considers that significant gaps remain in the plan's biodiversity evidence, monitoring, mapping and policy framework. The Trust is asking for these issues to be addressed before the plan is submitted for examination, so that it can provide an effective framework for protecting wildlife and habitats and supporting nature recovery across Stoke-on-Trent.

