Chell, Wayne

From: Preece, Mark

 Sent:
 03 August 2017 15:11

 To:
 Simpkin, Rachael

 Cc:
 Planning (SMDC)

 Subject:
 SMD/2017/0298

Categories: Blue Category

Rachael,

Please find attached comments in relation to:

SMD/2017/0298 Land Off Ashbourne Road, The Old Copperworks, Whiston, Staffordshire, Proposal Residential development of 11 dwellings

A preliminary ecological appraisal was carried out Absolute Ecology in June 2017. The survey concluded that further reptile and bat surveys were required. A reptile survey was advised prior to the submission of a planning application. There was also an indication that the mix of habitats on site may be of value to invertebrates.

When I visited the site on 2/8/2017 the area marked as semi-improved grassland consisted of relatively diverse species-rich grassland. The area of species-rich grassland is in excess of 0.25 hectares - the size threshold for designation as a Site of Biological Importance (SBI). The site may also be considered as an SBI under the mixed habitat and structural mosaic site criteria.

Due to the lack of sufficient ecological information and the risk of impacts to important habitats I object to the application at this time. Before the application can be determined the following ecological information must be provided by the applicant:

The habitats on the site have potential to be of Local Wildlife Site (LWS) value, and should be assessed in more detail against the current designation criteria, available here:

http://www.staffs-ecology.org.uk/html2015/index.php?title=SBI_Guidelines

It is important that any areas meeting the LWS are identified, as they are a material consideration in the planning process.

The site is suitable for reptiles and further surveys were advocated before a planning application can be determined. The methodology for the survey is based on the guidelines provided by the Herpetofauna Groups of Britain and Ireland (2003) and Froglife (1999), which recommends a minimum survey effort of seven visits during suitable weather conditions to establish presence. Survey visits should be spread over the survey season between April and September.

There is no assessment of the value of habitats for invertebrates. The mix of bare ground, flower rich grassland, scrub, woodland, hedgerow may have value for invertebrates.

The site may classify as an 'open mosaic on previously developed land'. Open mosaics on brownfield sites can be of importance to invertebrates. Open mosaic habitats on previously developed land' are a UK Biodiversity Action Plan (UK BAP) habitat and a Priority habitat listed on Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC Act). Further surveys are suggested to assess the potential of the site to support invertebrates according to best practice guidelines.

For more information see:

https://www.buglife.org.uk/sites/default/files/Identifying%20open%20mosaic%20habitat.pdf

A bridge was present on site that had moderate potential for roosting bats and two bat surveys were advised according to , J.(eds) (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Edn). The Bat Conservation Trust. There is no indication that the bridge is to be retained in the development layout drawing. If any work, or disturbance to this structure is planned then surveys must be carried out.

Regards

ST137HU

Mark

Mark Preece
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