
From: Kate Dewey
Sent: 30 July 2021 15:44
To: Ben Hurst; Planning (SMDC)
Cc: Steve Massey; Alex Fitzroy; Elite Ecology
Subject: SMD/2021/0454 Land off Clewlow Bank

Categories:

Ref number SMD/2021/0454

Application Location Land Off Clewlow Bank, Bagnall, Staffordshire

Application description Outline application with details of access (all other matters reserved) for an erection of up to 4 single-storey dwelling houses with associated access, landscaping and servicing

Site size hectares 0.20

Grid reference: SJ 92755 51595

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.

SUMMARY – Holding objection -further information and amendments required.

Required prior to determination:

1. Reptile survey information and report amendments:
 - a. Clarification on which site was surveyed for reptiles.
 - b. Revised recommendations for mitigation and enhancements relevant to the development site.
2. Details of level changes and disposal/relocation of spoil
3. Location of proposed surface and foul drainage.
4. Biodiversity Impact Assessment (BIA)

Secure via condition should approval be granted:

5. A reptile and amphibian protection method statement.
6. A nesting bird method statement including supervised clearance works **or** timing of works to avoid the nesting season. Based on section 5.3.2 of the PEA report (March 2020).
7. A hedgehog method statement with reasonable avoidance measures. Based on section 5.3.3 of the PEA report (March 2020).
8. Provision of one bird box per dwelling to compensate for lost nesting habitat.
9. A landscaping plan for the site and any mitigation area, showing habitats to be retained and enhanced, including features for reptiles, informed by the BIA and species requirements.
10. Long-term management plan for created habitats

Documents reviewed:

- 1924_P01D_Location Plan
- 1924_P02A_Existing Site Plan
- 1924_P03E_Proposed Site Plan
- 1924_Planning Statement_June21
- Application Form
- Elite Ecology Preliminary Ecological Appraisal Report March 2020
- Elite Ecology Amphibian and Reptile Report August 2020
- SCP_200130_Technical Note September 2020

DESIGNATED WILDLIFE SITES

There are a number of Local Wildlife sites in the surrounding area, the closest of which is Windy Croft Local Wildlife Site, to the west of the site on the opposite side of the road. The site supports species-rich grassland, acid grassland

heathland and woodland. While none of the sites will be directly impacted, the proposed development has a role in linking the wider ecological network. The design of landscaping and ecology mitigation should be informed by these locally characteristic habitats.

HABITATS

Biodiversity Net Gain

Almost half of the existing poor semi-improved grassland will be lost, which would appear to result in a net loss of biodiversity. A Biodiversity Impact Assessment (BIA) using either Defra metric 2.0 or 3.0 is required to ensure that biodiversity net gain is delivered. This would need to be achieved both within the development as far as possible, and via enhancement of the adjacent landholding or other suitable area nearby. Habitats should reflect those in the wider area such as species-rich grassland, heathland and scrub.

Drainage

The application form states that a package treatment plant will be used to treat foul drainage and a sustainable drainage system will deal with surface runoff. However, there is no information on where or how drainage infrastructure will be provided within the site, which means additional impacts from this construction cannot be judged. Indication of the location for the foul drainage plant is required pre-determination.

A drainage scheme should be secured via condition, including where possible sustainable drainage methods such as water butts and permeable surfaces.

Ground works, level changes

It would appear from the proposed site plan (1924_PO3E) that changes in ground levels are proposed to the northern half of the site to facilitate the dwellings. There is no information as to where spoil will be placed or disposed of. There could be potential to use subsoil for landscaping and habitat creation on the land to the south, but this would need to be incorporated into an appropriate landscaping scheme for habitat gains. More information is required.

SPECIES

Reptiles

Survey methods- The Reptile and Terrestrial Amphibian Report (August 2020) by Elite Ecology contains inconsistencies regarding the site location. The grid reference within section 1.1 and figures 1 and 2 on page 5 all refer to a field to the west of the site located on the other side of the road (Clewlow Bank). The phase 1 map in Appendix C shows the correct site, which is the same map used within the Preliminary Ecological Appraisal report (March 2020). Clarification is needed as to whether the correct site was surveyed for reptiles.

Results- A low population of grass snake and common lizard were recorded.

Impacts and Mitigation- Reptiles have the potential to be impacted during construction contrary to their legal protection, and some habitat loss will occur which would contribute to population declines.

The recommendations (Section 6) within the reptile report also appear to be aimed at the site to the west of Clewlow Bank rather than the development site. The report states that reptiles could be relocated to the fields along the western boundary and that vegetation clearance should start east to west so that no reptiles are pushed towards Clewlow Bank road, however, the road is located along the western boundary so these recommendations do not match up. Although small in size the development site does contain space for habitat retention and enhancements which could be situated within the southern half of the site (based on 1924_PO3E_Proposed Site Plan). This would also ensure a habitat corridor between the local wildlife sites to the west and east of the site is retained.

Given the presence of reptiles in the wider area and the suitability of habitat on the proposal site, it can be assumed that reptiles could use the proposal site. Further surveys are not required, but appropriate avoidance and protective measures need to be taken regarding site clearance and construction. Amendments are needed to the reptile report so that the recommendations are aligned to the development site and plans.

Habitat mitigation should include reptile features such as breeding/egg laying piles, scrub, and rough grassland. We would also like to see a south facing basking area included, away from potential disturbance. These must be shown within updated plans with descriptions. A reptile and amphibian method statement will be required following the recommendations within section 6 pending the amendments. The enhancements and method statement may be secured via conditions.

Amphibians

No evidence of GCN was found during the surveys, but precautions are required for amphibians in general – to be included within reptile measures.

Birds

The PEA report (March 2020) states that there is a potential for nesting birds to utilise the vegetation onsite. A bird method statement will be required to ensure the works do not negatively impact on nesting birds. This is to include supervised clearance works or timing of works to avoid the nesting season. The development could include a minimum of 1 bird box per dwelling to compensate for lost nesting habitat. These are to be secured via condition.

Hedgehogs

The PEA report (March 2020) states that there is high potential for hedgehogs to utilise the site. As per section 5.3.3 of the report, a hedgehog method statement is required to include supervised ground clearance. This should also include good housekeeping (no nets or litter on the ground), materials to be stored on pallets, and to provide escape ramps within any open holes or ditches to enable escape if an animal falls in. To be secured via condition.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



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2 Attachments