

From: [Johnston, Christopher](#)
To: [Planning Comments \(SMDC\)](#)
Subject: FW: SMD/2021/0491 Land off Tenford Lane
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From: Kate Dewey <k.dewey@staffs-wildlife.org.uk>
Sent: 08 October 2021 18:45
To: Johnston, Christopher <Christopher.Johnston@StaffsMoorlands.gov.uk>

Subject: SMD/2021/0491 Land off Tenford Lane

Ref number SMD/2021/0491

Application Location Land off Tenford Lane, Tean, Staffordshire, ST10 4EN

Application description Approval of reserved matters, appearance, landscaping, layout and scale in relation to SMD/2016/0811

Site size hectares 4.33

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. Ecological Construction Management Plan (ECMP) to tie in the following:
 - a. Root protection areas (RPAs) for all retained trees/hedgerows following BS 5387 (2012).
 - b. Timing of works on or near to hedgerows and trees to avoid bird nesting season (March – August inclusive).
 - c. Badger method statement, following badger report recommendations.
 - d. Precautionary amphibian/great crested newt method statement.
 - e. Bat method statement for the felling of tree T4541 (tree 55 within ecology report) including survey and/or supervision.
2. Full drainage plan, including:
 - a. Additional sustainable drainage features (see drainage comments).
 - b. Amendments/additional information on the proposed cut of drain along the southern boundary, taking into account root protection areas.
 - c. Clarification on bund creation to the north of the development and how it may be connected to SuDS features.
 - d. Amphibian-friendly road and drainage design.
3. Soft landscaping and management plans to be updated as necessary to include additional enhancements and amendments.

Secure via condition should approval be granted:

1. A sensitive lighting scheme, mitigating for bat habitat and retaining dark corridors.

Documents reviewed:

- 00019_TEN_DOC_01_B Design Commentary - Foul and Surface Drainage Strategy
- 00438 AL(0)08 Location Plan
- 00438 AL(0)17 Proposed Site Plan
- AW0127-PL-001-Sh1 of 2 Softworks and Habitat enhancements
- AW0127-PL-001-Sh2 of 2 Softworks and Habitat enhancements
- BALDS019-21 Tree Protection Plan Revision B
- Ecological Survey Report July 2021 - Apex Ecology
- Landscape and Habitat Enhancement and Management Plan
- Decision Notice (SMD/2016/0811)
- Prelim. Eco Assessment - Middelmarsh Environmental (SMD/2016/0811)
- Badger Report July 2021 – Apex Ecology
- K594-100RevA Strategic Drainage Plan

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

The development does not appear to impact directly on any wildlife sites. Providing adequate mitigation and enhancements are included, indirect impacts can also be avoided (see below).

There are several semi-natural habitats nearby that form part of the local ecological network – including heathland within the quarry to the north, woodland, and the River Tean. These must be protected, and habitat creation designed to link and complement the existing habitats by using locally characteristic planting.

HABITATS

Biodiversity Net Gain

Policy NE1 in the Staffordshire Moorlands Local Plan Adopted September 2020, expects that ‘all development where possible seeks to deliver a net gain in biodiversity proportionate to the size and scale of the development. In circumstances where adverse impacts are demonstrated to be unavoidable, developers will be required to ensure that impacts are appropriately mitigated, with suitable compensation measures towards loss of habitat used only as a last resort where there is no alternative’

The current plans would appear to result in a clear biodiversity net gain, therefore we do not require a metric to be produced. However, some amendments to the specifications would maximise gains.

Specific habitat protection/ loss/ creation

The proposed development will replace much of the improved grassland onsite, with some retained in public open space (POS) and enhanced or newly created habitats. As per plan AW0127-PL-001-Softworks and Habitat enhancements these include a meadow (POS), SuDS swales and infiltration basins, and additional tree, hedgerow, and scrub planting. Habitat log piles are proposed. Garden

fences will incorporate hedgehog access holes, whilst the rear of many of the gardens will be delineated via the new hedgerows. This is all welcomed, however, a few amendments would maximise habitat value:

- The existing hedgerows should be enhanced with tree planting and undersown where appropriate with woodland species found within the local area.
- The proposed scrub planting includes *Pinus sylvestris* which is not locally. *Viburnum opulus* whilst native is not common in the local area so should be replaced with gorse, which is characteristic of acidic/sandy soils and nearby habitats.
- The proposed meadow seed mixes (N4 and N9) for the public open space are not locally characteristic. These could be used in more ornamental areas, but for the main meadows seed should be collected from a suitable donor site within the local area, such as a local wildlife site. This will help to conserve the donor meadow and is also typically a more economic option than commercial mixes. SWT is happy to advise further on meadow creation techniques and sources.

Both the soft landscaping plan and management plan will need to be updated to reflect any changes.

Trees and hedgerows –

The root protection areas as shown in the tree protection plan need to be implemented in full. All retained trees and hedgerows need to have adequate root protection areas (RPA) installed. Following guidelines set out in British Standard 'BS 5837 (2012) – Trees in Relation to Design, Demolition and Construction' in full.

Surface Drainage

Drawing AW0127-PL-001-Sheet 1 of 2 (Softworks and Habitat enhancements) shows some of the proposed SuDS features including a swale and proposed planting. These are welcomed. A Foul and Surface Drainage Strategy has been submitted, however, the plans do not match up so it is unclear whether these are the final proposals. Therefore, a finalised drainage plan for the site is required – please see below comments for amendments.

Table 4 within section 5.4.2 of the Foul and Surface Drainage Strategy (Rennard Consulting Limited) lists SuDS features that are suitable for the development based on the site conditions. Suggestions are made for rain gardens and water butts for collecting rain water but these have not yet been implemented within the proposals. Green roofs and rainwater harvesting systems would be other options. From an ecological perspective, we would like to see more of these features included within the proposals to provide additional habitat and/or reduce surface runoff, especially as the site is relying on infiltration.

As per the Proposed Drainage Strategy, permeable paving is proposed for the driveways to reduce runoff. 4 infiltration basins are proposed, 3 of which will be constructed alongside a swale in the south-western section of the site. We would like to see permeable or porous paving also used for the pavements around the site, and if possible some parking spaces surfaced in reinforced gravel / grass. We also recommend that the proposed footpath around the open space is also porous or designed in a way that does not channel water along the path, to reduce runoff.

According to the Foul and Surface Drainage Strategy, a landscaped earth bund is proposed across the northern edge of the site to divert surface water away from the development. This is not shown within the soft landscaping or proposed site plans. It is not clear where the diverted water would disperse- an additional swale may be required to connect this feature to the SuDS to the south. An additional hedgerow could also be planted along the bund to increase habitat value.

The surface drain running adjacent to the central hedgerow (H2) could be changed to an open swale.

A cut-off drain is shown running adjacent to the southern hedgerow – to our knowledge (judging by the ecology reports) no existing ditch is present along the southern boundary. The excavation to install this cut off drain is likely to conflict with the root protection of the existing hedgerow and trees. A relocation or redesign of this cut off drain may be required.

Ground works, level changes, soil

Ground levelling for dwellings and excavation for SuDS is proposed which will create spoil. There are currently no details for its disposal. It is assumed this will be used for the bund creation.

Sub-soil should be used for all habitat creation where possible, as low-nutrient substrates achieve better results.

SPECIES

Bats

Survey methods- The ecology report by Apex Ecology (July 2021) states that trees were subject to a ground inspection. However, as per sections 2.18 and 2.19 due to the trees being in leaf PRFs may have been missed.

Results- Appendix V of the report lists numerous trees with moderate and high bat roost potential that were recorded around the site. The majority of these are situated within the woodland edge to the north, with a few located along the southern boundary hedgerow.

Impacts and Mitigation- As per survey method comments above, survey limitations were present thus a precautionary approach must be applied. As per the arboricultural report, tree T4541 (Tree 55 within the ecology report) which is located in the southern hedgerow is to be felled. Apex Ecology recorded this tree as having moderate roosting potential. The report recommends an aerial inspection or a bat survey to be conducted prior to soft felling. If a bat roost is present a licence may be required, along with additional mitigation and compensation. Bat survey/aerial inspection is required before determination. It would be ideal if the main section of the tree could remain in place rather than felled completely, with the limbs removed for safety.

Sections 4.6 – 4.12 of the ecology report recommend that a bat transect survey is carried out. Bats are likely to use the woodland edge, hedgerows, and other boundary features for foraging and commuting. No hedgerows are being removed and there is a buffer (retained section of field) between the development and northern woodland, along with new hedgerow planting. Therefore, a transect survey may be unnecessary in this case, providing a good lighting plan can be secured that mitigates for commuting and foraging bats. If this can be achieved, commuting and foraging habitat will be retained and no significant impacts are anticipated.

As per the BCT lighting guidelines, retaining dark areas is the best choice and should be considered first. Where this is not feasible mitigation should be put in place to minimise light spill. In particular, the northern boundary of the development, where the majority of trees with roosting potential were concentrated along the edge of the woodland, but also the other hedgerows retained on site. The proposed pathway along the proposed open space must not be lit continuously. If lighting of the path is required, this should be triggered via sensors and on a short timer. Full details including designs to mitigate for light spill are needed within a lighting scheme, to be conditione.,

Enhancements - A number of bat boxes are shown on plan 'AW0127-PL-001 1of2 Softworks Proposal, Landscape and Habitat Enhancements', these are welcomed. Lighting of proposed bat boxes should also be avoided.

Amphibians and reptiles

All surveys returned negative results for great crested newts despite some suitable HSI scores of nearby ponds.

No reptiles were recorded during the reptile survey, however, common toads and common frogs were found on site –toads are a priority species. The proposed wetland habitats and proposed habitat piles should enhance the site for these species. However, we would like to see some more habitat piles located around the proposed SuDS features at the south of the site, perhaps adjacent to the existing hedgerow to provide additional cover and reduce disturbance.

An amphibian protection method statement is required; this should include the installation of the above features – which also need to be detailed within the updated drainage plans.

Amphibian friendly road design is required. Dropped kerbs should be utilised instead of raised kerbs, as these can be a barrier to movement and increase road mortality. Gulley pots must be avoided as these can act as traps - unless amphibian escape features can be implemented, such as amphibian ladders.

Birds

A number of swift and house sparrow boxes are shown on plan 'AW0127-PL-001 1of2 Softworks Proposal, Landscape and Habitat Enhancements', these are welcomed.

Works on or near to hedgerows and trees must be avoided during the bird nesting season (March – August inclusive).

Badgers

Condition required to secure recommendations set out in sections 4.3, 4.4, 4.6, 4.7, 4.8 and 4.9 of the Badger Report in full. To be part of a badger method statement.

Ecological Construction Management Plan (ECMP)

An Ecological Construction Management Plan (ECMP) is required to tie in all of the above mitigation (amphibians, badgers, bats, birds, and root protection areas). To be approved prior to determination.

Regards,

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Senior Planning Officer

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Planning consultations- please send to planning@staffs-wildlife.org.uk

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