

From: [Berry, Ailsa](#)
To: [Planning Comments \(SMDC\)](#)
Subject: FW: SMD/2021/0418 | Staffordshire Moorlands - Land South East of A521 - Blythe Vale Phase 2
Date: 15 October 2021 09:08:51
Attachments: [image591463.png](#)
[image705183.png](#)

From: Kate Dewey <k.dewey@staffs-wildlife.org.uk>

Sent: 15 October 2021 08:00

To: Sam Rogers <srogers@stmodwen.co.uk>

Cc: Haywood, Ben <Ben.Haywood@highpeak.gov.uk>; Berry, Ailsa <Ailsa.Berry@highpeak.gov.uk>; Peter Hayward <peter.hayward@turley.co.uk>; peter.hoy <peter.hoy@fpcr.co.uk>; Steve Massey <Steve.Massey@highpeak.gov.uk>

Subject: Re: SMD/2021/0418 | Staffordshire Moorlands - Land South East of A521 - Blythe Vale Phase 2

Dear all,

Below are my initial comments, although I do expect to discuss several areas further with Peter. I am on leave from this afternoon until Wednesday 20th October, but am happy to discuss further on my return.

SMD/2021/0418

Land South East Of A521, Uttoxeter Road, Draycott In The Moors

Full planning application for residential development of 200 dwellings (Use Class C3), access and internal roads for vehicles, footpaths and cycle linkages, parking, public open space and landscaping, ecological habitats, community orchard, sustainable drainage measures, and associated infrastructure and earthworks.

Site area 10.86 hectares

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/ amendments required.

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

Potential Local Wildlife Sites

Grassland in compartments 3, 4 and 5 contain a large number of 'scoring' species for Local Wildlife Site criteria, particularly a number of sedges and rushes as well as many flowers indicative of lowland meadow priority habitat. Although many are at low abundances, no assessment against the criteria has been presented to show that parts of the site do not meet the criteria.

At least half of this habitat will be lost under the current proposals. Further information is required in terms of LWS assessment.

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'

Biodiversity Impact Assessment using Defra metric 2.0 has been provided. How the baseline and impacts have been calculated is not entirely clear and subject to further discussion with FPCR.

Grassland

All grassland creation or enhancement should use locally sourced seed of hay from an existing diverse meadow on similar soil.

The area over the underground storage tank is shown to be sown with Universal grass seed mix- this should be a wildflower meadow mix as the other open space. Thinner soil is ideal for wildflowers and as much species-rich meadow is required as possible to compensate for grassland losses.

All new grassland areas should use subsoil rather than topsoil to aid meadow establishment.

Any flora turfs of interest, particularly sedges and other wet grassland plants should be translocated into the retained areas to conserve the local flora.

The bund ideally would be planted with trees on the shadier north side, with grassland on the warmer southern side where this will be most beneficial to insects.

Ponds

There are currently 6 ponds on the site, two of which have been created as GCN mitigation. The current plans retain most of the ponds, but Pond 2 (as numbered in the GCN report) on the northern site boundary is proposed to be lost. This pond supports GCN and smooth newts.

Given the amount of space on the site, Pond 2 should be retained within the layout design. Losing the pond would further alter the hydrology of the site. The pond overlaps partly with only two plots- it could be integrated into the peripheral greenspace and made a focus for homes to face onto. Potentially space in the northern most side of the site could accommodate more development as these areas are less diverse.

Plots 184 -186 are very close to Pond 5, affecting terrestrial newt habitat but also not making best use of the pond as a feature. Could the plots in this area be turned around so that homes face the pond? Pond 5 is also densely shaded and would benefit from some tree thinning to benefit the habitat and potentially to give better views of the water. This would open the area up for more landscape value.

I am also concerned that the quantity, and quality, of water feeding the ponds will change dramatically due to the level of development and the drainage proposals. The ponds appear to be fed currently by rainwater run-off over the fields, rather than ground water, which may explain why some have been dry in certain years. The development would effectively intercept and divert near to half the rainwater into the pipes and the storage tank, changing the hydrology of the site. This could cause the existing ponds to dry up, especially the central ponds P3 and P4 and potentially the new newt ponds. The established ponds are all present on the 1880 OS map, so have been stable for a long time, possibly because they are partly seasonal and do dry up in some years- this is ideal for amphibians and also reduces the build-up of silt. However to be functional amphibian and aquatic habitat the ponds do need a consistent and clean source of water.

The drainage scheme needs to better maintain, or mimic, the current hydrology. More surface water features and water flowing into the landscaped areas would be beneficial, and also reduce volumes needing storage. Ponds 3 and 4 currently appear to be fed via a marshy area to the northwest of P3, which would be destroyed. Ideally more of this valley feature should be retained alongside the proposed roadway. Anywhere that roads are next to open spaces, dropped curb edges could allow water to flow into the green spaces rather than be collected. The water sources to the ponds need to be clean water, so would have to ensure adequate filtration; or, rainwater directly from roofs could be directed into the ponds' catchments. A swale along retained hedgerow H4a/H4 running north/south would be ideal to receive, filter and drain water towards the ponds.

I would advise also that tree planting should be avoided within 50m of any ponds, as trees will take up more water, as well as potentially shade and drop leaf litter into the water leading to maintenance issues.

Pond safety in terms of children may need to be considered- in general, gentle slopes are best so that ground gets gradually wet rather than a sudden drop, and safe entry areas e.g. gravel beaches or a dipping platform could be an option so that residents can safely see the water.

Hedgerows

The Arboricultural Officer raises the issue of an existing hedgerow H4 proposed to be retained sandwiched

between dwellings/garden boundary fences, at Plots 120/122/156/170. One option to give this hedge some long-term protection could be to exclude it from the curtilages of the houses, having the boundary fences on either side of the hedge, but with either post and rail fencing or railings so that the hedge is visible and can be trimmed by either side, but not removed. If the hedge can be used to receive rainwater as a SuDs corridor this would enable a wider area to be retained.

We support the comments of the Arboricultural Officer regarding shrub and trees species, and the need to enhance existing and new hedges with standard trees.

Where hedge sections or shrubs are to be removed, all material should be retained on site to form log piles and to create linear brash piles along newly planted hedges. This creates instant habitat while planting establishes.

Landscaping

We would support a clearer circular path around the whole development as traffic-free walking route, and as a linear greenspace/ habitat corridor.

Surface drainage

The proposals will include 4.542 ha impermeable area and 6.318 ha permeable area. It is proposed that the surface water from the site will be discharged into the existing ditch running along the South East of the site via an existing headwall which was constructed as part of Blythe Vale Phase 1. This means that nearly 42% of the current surface water will be diverted unto the tank and directly into the watercourse, rather than running through the site.

There are no surface storage features proposed, and no clear means of water filtration. This raises concerns over the quality of water to be discharged.

More water needs to be maintained within the landscape, otherwise trees and hedges especially within the development, as well as ponds, may suffer from drought in the summer, as they will be receiving much less water run-off from the surrounding catchment. The retained hedge lines, and roadside green spaces, would be ideal to receive water from hard surfaces, keeping vegetation hydrated and transmitting excess to the southern green space. Roof water from the southernmost homes could also be directed into the ponds as previously mentioned. Water butts should also be installed on every building, to help with storage as well as drought resilience.

The drainage scheme needs to be amended to include the above.

SPECIES

Bats and Birds

Recommendations in the Ecological Appraisal 2021 should be conditioned should permission be granted.

Great Crested Newts, Amphibians

Ponds 2,3, and 5 have had GCN recorded in surveys since 2015. Pond 2 is proposed to be lost. A licence will be required for all works impacting newt ponds and terrestrial habitat.

Considering the 3 tests under Habitat Regulations, I do not think that the loss of Pond 2 meets two of the tests- overriding public interest, or that there is no satisfactory alternative. The site could be developed with Pond 2 retained in situ as it is on the edge of the site and only impact 2 plots, where the layout could be easily amended. There is a risk that a licence would not be issued if the 3 tests are not met.

SUSTAINABLE DESIGN

Most homes and roads face north/south, but the orientation and design of roofs does not allow for effective use of solar panels in all cases. The design could better maximise this opportunity.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



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

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2 Attachments

On Fri, 1 Oct 2021 at 10:56, Sam Rogers <srogers@stmodwen.co.uk> wrote:

Hi Kate,

I hope you're both well and apologies for the direct approach.

I understand that you have been consulted by Staffordshire Moorlands District Council on the above referenced Full Planning Application, which relates to our proposed residential development of 200 dwellings, access and internal roads for vehicles, footpaths and cycle linkages, parking, public open space and landscaping, ecological habitats, community orchard, sustainable drainage measures, and associated infrastructure and earthworks – which comprises Phase 2 of the ongoing works on the land at Blythe Vale, south of Blythe Bridge.

The statutory determination deadline is today (1 October), although there are a few consultees still to provide comments, including Staffs Wildlife Trust.

The Full Planning Application has been accompanied by a GCN Mitigation Strategy; and Ecological Appraisal, which includes the headline results of a BNG Assessment that indicates that the on-site habitat creation and enhancement within the development will result an increase in habitat biodiversity and hedgerow units.

We have agreed an Extension of Time with Staffordshire Moorlands District Council until 11 November, which takes us to the next available Planning Committee, although, as you will be aware, the Officers' Report will most likely need to be finalised two weeks before that date, which does not leave us with much time to collate the outstanding consultee comments and address any final points.

I appreciate that you will currently be extremely busy, but please could I ask you to review the above application at your earliest opportunity and provide your comments as soon as possible, to help ensure that the application can progress to a timely determination and enable us to maintain build continuity on site?

Kind regards,

Sam



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