
From:
Sent: 10 November 2021 09:00
To:)
Cc: k
Subject: SMD/2021/0479 Land Off, Stanley Road

Ref number SMD/2021/0479

Application Location Land Off, Stanley Road, Stockton Brook, Staffordshire

Application description Application for Outline Planning Permission with details of access (all other matters reserved) for a proposed detached dwelling

Site size hectares 0.2

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.

Required prior to determination:

1. Biodiversity Impact Assessment utilising DEFRA metric 3.0 or above, including full botanical survey of grassland in the optimal season.
2. Consideration of alternative access to avoid hedgerow/tree loss.
3. Further information on proposed hedgerow relocation and assessment of impacts, including proposed hard-surfacing and impacts to retained trees.
4. Consult with SCC Flood Team, due to surface water flooding issues.
5. Outline foul and surface drainage plans – due to potential ecology impacts and surface flooding – to include SuDS and wetland habitat features.
6. Further information on bat roosting potential of trees.
7. GCN risk assessment including HSI of other ponds within 250m

Secure via condition should approval be granted:

8. Pending results of the BIA, a landscaping plan detailing habitat creation and enhancements to secure a biodiversity net gain, including:
 - a. New mixed native hedgerows for all boundaries.
 - b. Enhancement of existing pond.
 - c. Enhancement of grassland outside of red line boundary proportionate to that lost or disturbed.
 - d. Habitat piles.
 - e. Garden/landscaping details within red line boundary including planting lists.
 - f. Bird boxes.
 - g. Reptile enhancements.
9. Management plan to secure habitats long-term.
10. Bat-friendly lighting plan.
11. Reptile method statement.
12. Timing constraints to avoid tree felling or vegetation clearance during bird nesting season **or** inspection by ecologist prior to works commencing.
13. Ecology Construction Management Plan (ECMP), to include RAMs for mammals, GCN, reptiles, birds.
14. Comprehensive SuDS drainage scheme with wildlife habitats.

Documents reviewed:

- 21-120-01 Existing Location & Site Plan
- 21-120-02 Proposed Location & Site Plan
- 21-120-03 Revised Plan
- Application Form
- Design & Access Statement Rev A
- Preliminary Ecological Appraisal (Elite Ecology, June 2021)
- Tree Survey
- Tree Protection Plan

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

The site is within a network of semi-natural habitats linking a number of designated sites.

Local Wildlife Sites

Houghwood (SBI) is located nearest to the site. The closest section being approximately 180 m from the development site to the south-west. However, the topology of the site sloping away from this wildlife site means it is unlikely to be impacted by the proposals (by surface runoff for example).

HABITATS

Hedgerow

As shown in the proposed plans, the hedgerow along the northern boundary of the site is proposed to be moved for highway safety purposes. Appendix A of the ecology report states that plans were not available at the time of writing. Therefore, the potential impacts to the hedgerow and species using it have not been fully assessed. Furthermore, although it is classed as J2.1.2 (species-poor intact hedgerow), a species list has not been provided. We note from the tree survey report that the hedgerow contains trees, two of which are recommended to be felled.

The Design and Access Statement states that *“the existing road-side hedge to the site would be removed in its entirety in order to create a safe point of access. A new hedge would be planted, of species to be agreed, located approximately 3 metres from the highway to increase visibility for the new access.”* It goes on to say that *“The space created between the new and existing hedge will be hardsurfaced to provide a pedestrian footway.”* ... *“The provision of a 3 metre wide strip of hardsurfacing across the site frontage in front of the new boundary hedge will provide a refuge for pedestrians to stand away from passing vehicles”*

The inclusion of a hard surfaced pavement where the existing hedgerow is located would conflict with the Tree Protection Orders (TPOs) as shown within the Tree Survey report. This would likely require the felling of all of the trees. Even if they were to be retained, their root protection areas would be encroached upon. At present, the proposals are unacceptable, due to conflicting plans or statements and lack of assessment of potential impacts.

Avoidance should be the first step. Could the existing field access be used, which has a better visibility? Is pedestrian access required when there is no pavement present on the rest of the road?

Should any hedge be removed, translocation of shrubs is the next option, as well as re-using hedge material such as brash and stumps to form new habitats. Any replacement hedgerow would need to utilise locally native species, standard trees, bank and ditch if possible plus seeding with appropriate ground flora.

Alternative design, and/ or additional information and assessment of hedgerow impacts needed prior to determination.

Grassland

The PEA survey found the grassland to be improved, however, the presence of species such as crested dog's tail, marsh thistle, and heath bedstraw indicate that the grassland is at least poor semi-improved, or more diverse which would have a higher baseline habitat value. This is also suggested by the sites previous/current use as a hay meadow (assumed from public comments). Google streetview images

suggest a diverse field with marshy areas. This requires a more accurate botanical survey of the grassland during the optimal season prior to any hay cutting, with abundances to ensure the baseline is as accurate as possible

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 proposal at present will appear to result in a net loss of habitats including temporary loss of a hedgerow, loss of mature trees, loss of grassland, and additional disturbance to habitats during and post construction.

A Biodiversity Impact Assessment utilising DEFRA metric 3.0 or above is required. Habitat enhancements/creation may need to be located outside of the red line boundary to secure a net gain.

We suggest that the following could be included within a landscaping plan and management plan, pending the BIA results:

- New mixed native hedgerows (with trees where suitable) for all boundaries, underseeding with a suitable wildflower seed mix.
- Hedge translocation or re-use of hedge materials
- Sustainable drainage features such as a new pond, swales.
- Grassland enhancement outside of the red line boundary to increase wildflower diversity, and reseeded of any disturbed areas with a wildflower seed mix.
- Any lawn area within the red line boundary to utilise a short-flowered lawn mix.
- Enhancement of the pond to increase wildlife value. This would also benefit any fish within the pond. To include:
 - o Re-profiling of banks to create shallow areas (if needed).
 - o A mix of native floating, submerged, marginal, and bank side plants around the edge of the pond to increase cover.
 - o Creation of habitat piles near and adjacent to the pond consisting of subsoil from ground works, deadwood from the two felled trees, brush piles from any hedgerow cutting.

Condition required for landscaping and management plans, pending BIA.

Drainage

From assessing the flood risk map and submitted public comments, the development site and surrounding area appear to have some surface flooding issues. We suggest that the SCC Flood Team may need to be consulted.

No drainage proposals have been included. Proposals for foul and surface drainage are unknown, thus the ecological impacts cannot be determined. As the site is liable to surface water flooding, soakaways may not be suitable. Some level changes, balancing and sustainable drainage may be required.

From an ecological perspective, any additional surface runoff could impact upon downstream habitats. Existing site runoff could also become an issue due to silting when the ground is cleared and excavated. Surface runoff issues will need to be assessed and mitigated.

It may be that a sustainable drainage scheme (SuDS) could help alleviate the surface flooding issues, perhaps by creating an additional pond/ retention basin and linking via open swales and ditches. Permeable surfaces should be utilised for parking areas, and landscaping designed in a way for infiltration – if suitable ground conditions exist. This would also help to achieve a biodiversity net gain by creating additional wetland habitats.

Outline foul and surface drainage proposals required prior to determination.

Ground works, level changes, soil

Any subsoil removed as part of ground levelling and excavations should be re-used for habitat creation. Spoil disposal details to be included within ECMP.

SPECIES

Bats

The preliminary ecological appraisal does not appear to have assessed the trees for bat roosting potential. As per the tree report, two trees are to be felled (T3 and T4) and the hedgerow relocated.

Further information needed prior to determination.

The ecology report states that a lighting scheme will be required to protect bat commuting and foraging habitat.

Lighting plan to be secured via condition.

Great Crested Newts, Amphibians

The ecology report found the nearest pond to the site to be of poor suitability for GCN. An eDNA survey was undertaken which returned a negative result. The pond is sparsely vegetated and comments suggest it is used for fishing, which further supports this result. Pond enhancement (as above) could increase the value of this habitat for a number of species. Section 5.4.1 of the ecology suggests some enhancements.

The surveys however did not investigate the three other ponds within 250m of the site, or checked for garden ponds. Aerial photographs and Google streetview show a small pond was present within the development site until at least 2017, and this looks to have had a diverse range of wetland plants. Local residents have reported sightings of newts in the area. Newt populations can persist on land for several years after a pond has been lost and so could still be present.

HSI Assessment of other ponds and GCN risk assessment to determine whether habitat impacts would require a licence and therefore whether further survey is required.

Reptiles

Due to suitable habitat and records within the area, section 5.3.7 of the ecology report recommends that a reptile method statement is followed with site enhancements to be included. ***Reptile method statement and enhancements to be secured via condition.***

Birds

Timing constraints required to avoid the bird nesting season for felling and hedgerow clearance. Alternatively, an inspection by an ecologist can be made prior to works commencing. ***Timing constraints or inspection to be secured via condition.***

The ecology report also recommends the inclusion of bird boxes. ***To be secured via condition.***

Badgers and other mammals

As per the ecology report, Reasonable Avoidance Measures (RAMs) for mammals (including badgers and hedgehogs) should be followed. Details within sections 5.3.1 and 5.3.4 of the ecology report. ***RAMs for badgers and hedgehogs to be secured via condition.***

As per section 5.4.5 of the ecology report, one Eco Hedgehog Nest Box should be included within a suitable location. ***Hedgehog enhancement to be secured via condition.***

Ecological Construction Management Plan (ECMP)

An Ecological Construction Management Plan (ECMP) is required to be made available to and followed by all contractors. To tie in all precautions/mitigation, including RAMs for badgers, hedgehogs, amphibians (including great crested newts), method statement for reptiles, and birds (e.g. timing constraints or nesting bird check prior to works commencing). Pollution prevention (including silt) and other steps if required.

ECMP to be secured via condition.

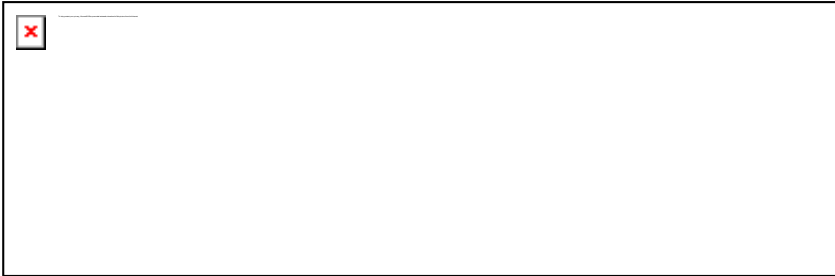
Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



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