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Subject: SMD/2021/0672 The Caravan
Date: 11 November 2021 08:51:18

Ref number SMD/2021/0672

Application Location The Caravan, Cheadle Road, Alton, Staffordshire, ST10 4DH

Application description Retrospective application for the change of use of land to provide for 14 Touring Caravans pitches with separate camping / open space; facilities building and reception and associated works.

Site size hectares 0.82

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. Our concerns from the previous application have not been fully addressed.

Required prior to determination:

1. Natural England to be consulted. Due to the adjacent SSSI and potential impacts.
2. Forestry Commission to be consulted. Due to the development being within 500 m of ancient woodland.
3. Layout amendments to mitigate for SSSI impacts.
4. Due to the proposed site usage and sensitive adjacent habitats, we would like to see details of how fires will be prevented e.g. from cooking. Campfires must be avoided.
5. Biodiversity Impact Assessment (BIA) using the latest DEFRA metric, to ensure a net gain is achievable.
6. A full drainage plan to assess potential ecological impacts to the SSSI and other habitats.

Secure via condition should approval be granted:

7. Timing constraints to protect nesting birds from clearance works.
8. Long-term management plan for buffer zone and any net gain habitats.
9. Sensitive lighting scheme, avoiding light spill onto woodland edge.
10. Badger walkover survey prior to works commencing.
11. Retention of tree identified as TN5, with requirement for bat surveys prior to any maintenance work or to accompany any proposals for removal.
12. Ecological Construction Management Plan (ECMP), to include:
 - a. RAMs for badgers and other mammals.
 - b. RAMs for reptiles.
 - c. GCN method statement.
 - d. RAMs for nesting birds.
 - e. Pollution prevention measures.
 - f. Root Protection Areas (RPAs) for all trees following BS 5837:2012.

Documents reviewed:

- 2013-1910-01A EXISTING BLOCK PLAN
- 2013-1910-02C PLANNING PROPOSAL – SITE PLAN
- 2013-1910-03A PLANNING APPLICATION - LOCATION PLAN
- 2013-1910-04B PLANNING APPLICATION - FACILITIES BUILDING
- 2013-1910-05 EXISTING CONDITIONS - SITE PLAN
- Application Form
- Planning DAS
- PEA (Absolute Ecology, 2021)
- Reptile Survey (Absolute Ecology, 2021)

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

Statutory Designated Sites

Our main concern is that the site is directly adjacent to Dimmings Dale & The Ranger SSSI, and falls within the highest risk zone. Natural England must be consulted for all planning applications that fall within this zone (except householder applications). This site also contains ancient woodland, which falls within 500 m of the development, triggering the need to consult the Forestry Commission. **Further consultations required prior to determination.**

Nearby development can have an indirect impact on ancient woodland or ancient and veteran trees and the species they support. A 15 m buffer zone has been included in the proposals. The ongoing management and retention of the buffer zone in the future should be secured by condition as part of any approval.

We recommend that opportunities to avoid and reduce impacts on the SSSI and wildlife are considered further by reviewing the proposed layout. Please refer to the attached illustrative plan, which summarises amendments which should be considered, including:

- Relocating the facilities building and overflow car parking to the eastern section of site on pitches labelled 20 -23,
- increasing planting and landscaping by the new facilities block
- providing a green area (with more planting) where proposed facilities building was and use for low intensity activity, such as picnic area or overflow for small tent pitches.
- Shortening the access track to the camping field

These amendments would provide a greater buffer protection for the SSSI/ancient woodland by:

- condensing the most intense site activities, both during construction and future use, to the least sensitive part of the site and graduating activity levels away from the buffer boundary.
- Reducing noise and light impacts on sensitive areas, affording more protection for bats and reptiles, in particular.
- Moving the most potentially polluting sources (waste storage, drainage, car parking and gas storage) to the least sensitive part of the site. Any spillages could be contained before reaching, particularly sensitive habitats or protected wildlife.
- Increasing opportunities to maximise landscaping across the site, maintaining green connectivity and wildlife corridors with the SSSI and surrounding landscape
- Ensuring fire prevention measures are in place and detailed within plans. Campfires must not be allowed.

Layout amendments and fire prevention details required prior to determination.

Local Wildlife Sites

Shaw Farm Fields (SBI) is located within 250 m of the site to the south-east. No direct impacts are anticipated, and indirect impacts may be avoided with suitable mitigation (covered above).

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'

It is unclear from the proposals whether a biodiversity net gain will be achieved. Due to this, a Biodiversity Impact assessment using Defra metric 3.0 is required. Additional enhancements may be required. ***BIA required prior to determination.***

Drainage

As per the application plan, a soakaway is proposed for surface water drainage and a septic tank may be proposed for foul drainage. No drainage plans have been submitted.

We would encourage the use of SuDS principles, including using permeable surfaces for parking areas (e.g. grasscrete), use landscaping to infiltrate, water butts, roadside swales, use existing ditches, and avoiding pipes in favour of open features.

Due to potential impacts to the adjacent SSSI and other habitats, a full drainage plan is required prior to determination to assess potential impacts.

SPECIES

Bats

As per section 5.4 of the ecology report, one tree was found to have low bat roosting potential. As per section 5.5, if any works are needed to this tree a survey will be required.

A sensitive lighting scheme will be required to protect bat foraging and commuting habitat, and the SSSI woodland edge in general. ***Condition required to secure sensitive lighting plan.***

Great Crested Newts (GCN), Amphibians

No access was possible to survey the nearby pond. Therefore, the development should proceed under a great crested newt method statement. Log and rubble piles are present on site; these should be retained within the least disturbed areas of the site. ***RAMs as per section 5 of the ecology report to be secured via condition.***

Birds

As per section 5.8 of the PEA report (2021), any site clearance works or works to the stone walls should avoid the bird nesting season (March to August, inclusive). ***Condition required.***

Reptiles

The reptile survey found no reptiles, but recommends taking a precautionary approach. This is required for GCN anyway, so may be covered by the same condition.

Badgers and Hedgehogs

Badger records exist in the area. As activity patterns of this species can change over a short time it is recommended that a badger walkover survey is undertaken prior to the commencement of works and this forms conditions as part of any approval.

Reasonable Avoidance Measures (RAMs) should be followed during site works to protect all biodiversity. Specifically, during construction works, any excavations left open overnight should be installed with a mammal ladder (piece of wood) to allow any hedgehogs or other mammals, including badger, ease of escape. In addition to this, any site clearance including removal of log or rubble piles must follow a precautionary methodology. ***Walkover survey and RAMs for badgers and hedgehogs to be conditioned.***

Regards,

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

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2 Attachments