

From: [Kate Dewey](#)
To: [Berry, Ailsa](#); [Planning Comments \(SMDC\)](#)
Cc: [Steve Massey](#); [Alex Fitzroy](#); [Nigel Baskerville](#)
Subject: Re: SMD/2021/0625 Bird Grove Farm - biomass boilers
Date: 13 December 2021 08:47:14

Ref number SMD/2021/0625

Application Location Bird Grove Farm, Sandon Road, Hilderstone, Staffordshire, ST15 8SL

Application description INSTALLATION OF EIGHT BIOMASS BOILERS AND ASSOCIATED EQUIPMENT AND THE ERECTION OF A LEAN-TO BIOMASS BOILER SHED, ASSOCIATED WOOD FUEL STORES, ALTERATIONS TO HAY BARN, AND FORMATION OF PERMEABLE STONE HARDSTANDING AREA

Site size hectares 0.2806

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 required.

Since we submitted our previous comments it has been brought to our attention that works have commenced prior to planning permission being granted. This includes works to the bungalow not included in the application, hedgerow removal, ground clearance/alterations, and demolition of an agricultural building. ***Due to this, we ask that all ecology aspects are now provided prior to determination.*** Many of our previous comments remain the same, however, any changes/additions are included below.

Required prior to determination:

1. Further information on the biomass boilers:
 - a. Ash disposal proposals.
 - b. Steps taken to mitigate for emissions and air pollution.
2. Full drainage plans to determine impacts and feasibility alongside net gain.
3. PRA of bungalow to assess bat impacts.
4. Great Crested Newt survey of nearby water features to determine potential impacts.
5. Detailed landscaping/ habitat creation plan with planting /seeding details and hedgerow creation/ enhancement with woody material.
6. Long-term habitat management plan.
7. Bat enhancements as per section 5.3 of the ecology report, shown on updated plans.

HABITATS

Hedgerows

The roadside hedgerow has been removed. Materials from the removed hedgerow

should be re-used on site to create a dead hedge along newly planted hedgerows (to increase habitat value and structural diversity) or deadwood habitat piles. If this material has been disposed of, new material of an equal volume will need to be sourced.

To add habitat value and compensate in some part for potential damage caused, new hedges are to include a small bank and ditch to add habitat value, under seeded with a suitable mix.

To be included on an updated landscaping plan and approved prior to determination.

Drainage

Our previous comments still stand, however, due to works already having taken place without assessment of impacts we now wish to see the full details prior to determination to ensure a biodiversity net gain is feasible and secured.

Full drainage plans required prior to determination.

SPECIES

Bats

It is understood that works to the bungalow and demolition of an agricultural building have taken place. The agricultural buildings were not deemed to have bat potential during the ecology survey. However, our previous comments only referred to the buildings as set out in the documents 'PL-02 R3 Site Plan', 'PL-06 Plan as existing' and 'PL-07 Plan as proposed'. None of the submitted plans showed works to the bungalow and the ecological survey did not cover the bungalow. This building is outside of the red line boundary for the application. Due to this, potential impacts to bats have not been fully assessed. A Preliminary Roost Assessment (PRA) of the bungalow is required to determine potential impacts of the proposed/undertaken works.

PRA of the bungalow to determine likelihood of bat presence and potential impacts, required prior to determination.

To enhance the site for bats, 3 bat boxes have been recommended. These should be detailed within the plans.

Bat box enhancements as per section 5.3 of the ecology report.

Great Crested Newts, Amphibians

We previously requested a survey of the nearby water features to ensure no great crested newts would be impacted by the hedgerow removal. Hedgerow removal has taken place prior to approval. The surveys are still required to determine if a negative impact may have occurred, and what compensation is needed (if any).

Assessment of impacts required prior to determination.

Birds

As the removal of the hedgerow and building demolition took place outside of the bird nesting season, it is unlikely an offence was committed regarding nesting birds. The planting of new hedgerows must be made a priority to replace lost habitat.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer

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

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2 Attachments

On Tue, 16 Nov 2021 at 08:00, Kate Dewey <k.dewey@staffs-wildlife.org.uk> wrote:

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SUMMARY –Holding objection -further information required.

Required prior to determination:

1. Further information on the biomass boilers:

- a. Ash disposal proposals.
 - b. Steps taken to mitigate for emissions and air pollution.
2. Outline drainage plans to determine impacts and feasibility alongside net gain.
 3. Great Crested Newt survey of nearby water features and assessment of impacts of hedgerow removal.

Secure via condition should approval be granted:

4. Method statement for hedgerow removal process, including nesting bird and amphibian precautions.
5. Detailed landscaping/ habitat creation plan with planting /seeding details
6. Long-term habitat management plan.
7. Bat enhancements as per section 5.3 of the ecology report.
8. Any other protected species mitigation required

Documents reviewed:

- Application Form
- Design & Access Statement
- Ecological Survey August 2021
- PL-01 R1 Location Plan
- PL-02 R3 Site Plan
- PL-03 R3 Landscaping Plan
- PL-04 Containers plan and elevations
- PL-05 Lean to plan and elevation
- PL-06 Plan as existing
- PL-07 Plan as proposed
- Planning Statement

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

Statutory Designated Sites

The development site is located within a SSSI risk zone. However, it does not appear to exceed the criteria that would require a Natural England consultation.

Local Wildlife Sites

Bromley Wood SBI (also ancient woodland) is within 850 m of the site. The development is potentially hydrologically connected to this site via the nearby drainage ditch to the north (not confirmed), which appears to eventually feed into the River Blythe further downstream.

ENVIRONMENTAL

Biomass Boilers

To ensure impacts are fully assessed, we would like to know the following:

- How the ash created from burning fuel will be used/disposed of.
- How any emissions from this process are to be controlled or mitigated

Information required prior to determination.

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'

A biodiversity net gain calculation has been submitted within section 6 of the ecology report, which shows that the proposals along with the suggested habitat creation/enhancement will result in a net gain for both habitat area and linear habitats. The development must follow the enhancement recommendations set out within section 5 and 6 of the ecology report, and any additional steps below.

Some mitigation is outside of the red-line boundary and should either be included within a revised boundary, or will need a s106 or similar agreement for off-site provision.

A long-term management and monitoring plan will be required to secure these habitats for a minimum of 30 years. ***Condition required.***

Hedgerows

A section of roadside hedgerow is proposed to be moved to allow for lorry access and the visibility splay. The ecology report found that this hedgerow is not an important hedgerow under the hedgerow regulations. However, it is a native species-rich hedgerow, a habitat of principal importance.

A method statement will be required for the hedgerow removal/moving process, to include precautions for nesting birds and amphibians. Ideally the hedge shrubs would be translocated to the new hedge position, or if this is not feasible, woody materials should be re-used on site to create a dead hedge along newly planted hedgerows (to increase habitat value and structural diversity) or deadwood habitat piles.

New hedges should ideally include a small bank and ditch to add habitat value.

Grassland

Proposed enhancement of existing grassland is welcomed- the proposed mix is acceptable but we recommend if possible obtaining seed or hay from a local diverse meadow, which is more locally characteristic and usually more economic than commercial seed mix.

Drainage

As per the application form, a soakaway is proposed for surface water drainage and it is unknown how foul drainage will be disposed of. No drainage plans have been provided. Outline details are required to determine potential impacts, including to proposed net gain habitats. We recommend creating a wetland feature such as a swale or ditch to receive surface and treated water, perhaps in association with new hedgerows.

Outline drainage plans required prior to determination.

SPECIES

Bats

The buildings and trees on site were deemed to be unsuitable to support bat roosts.

To enhance the site for bats, 3 bat boxes have been recommended. These should be detailed within the plans. ***Condition required to secure bat box enhancements as per section 5.3 of the ecology report.***

Great Crested Newts, Amphibians

There is a pond located to the south of the site, within approximately 250 m of the nearest red line boundary (SJ 96123 35981). There are also water features over the road to the west (SJ 95852 36236), although it is presumed they are used for fishing judging by the layout, which may reduce the likelihood of GCN being present. The ecology survey did not assess any of these features. The removal of the hedgerow could significantly disturb/injure/kill any GCN if present during their terrestrial phases. Based on existing guidelines, these water features should be assessed for GCN potential and an eDNA survey conducted if access is possible. Reasonable Avoidance Measures (RAMs) should be part of method statement regardless of whether GCN are recorded or not. However, if a population is recorded within any of the water features, then a licence from Natural England may be required.

Assessment of impacts required prior to determination.

Birds

Timing constraints for clearance works to avoid bird nesting season **or** be subject to a check by an ecologist prior to works commencing on the day. To also be included within the hedgerow Method Statement.

Condition required to secure timing constraints or nesting bird check.

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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