
From: \

Sent: 14 December 2021 08:00

To:

Cc:

Subject: Re: SMD/2021/0628 John Pointon and Sons

Ref number SMD/2021/0628

Application Location John Pointon and Sons, Bones Lane, Cheddleton, Staffordshire, ST13 7BT

Application description EIA Screening Opinion Request: food processing facility/edible bone processing factory

Site size hectares 2.9

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.

Documents reviewed:

- Preliminary Ecological Appraisal Report November 2021 by Sterna Ecology

EIA SCREENING

Churnet Valley SSSI, Felthouse Wood and Consall Wood ancient woodlands

The PEA assesses potential risks to designated sites, and provides more information on proposed pollution safeguards and mitigation. It concludes that 'There is therefore a risk that a major pollution incident, or fire, at the Proposed Development Site could have a significant impact on the Churnet Valley SSSI. Such an incident is most likely to occur through a pollution incident affecting water courses in the vicinity of the Proposed Development Site, such as the stream that runs through Felthouse and Consall Woods. Any such pollution could make its way south into the Felthouse/Consall Woods stream, which then flows directly into the Caldon Canal/River Churnet upstream of where it flows through the Churnet Valley SSSI. However, it is considered that the risk of this occurring is negligible.' Measures to prevent/ control pollution are outlined.

The following guidance is provided in the Planning Practice guidance on mitigation measures:

Can mitigation measures be taken into account at the screening stage?

Developers are encouraged to identify any features of their proposed development and any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment and to include these with the information required to inform the screening decision (see [regulation 6](#)). The extent to which mitigation or other measures may be taken into account in reaching a screening opinion depends on the facts of each case. The local planning authority must have regard to the amount of information available, the precautionary principle and the degree of uncertainty in relation to the environmental impact. However, there may be cases where the uncertainties are such that Environmental Impact Assessment is required. The local planning authority or the Secretary of State must ensure that, where such measures have enabled them to conclude that there will not be significant effects on the environment, and an Environmental Impact Assessment is not required, that their screening decision states those features of the development and those measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment (see [regulation 5\(5\)\(b\)](#)).

Paragraph: 023 Reference ID: 4-023-20170728

Given that we do not have the necessary expertise to advise on the effectiveness of industrial pollution control, both to water and air, we would advise that the Environment Agency or other advisors with relevant expertise advise further on this aspect.

We will support Natural England's view as to whether the SSSI would be potentially significantly affected.

Should proposed changes or extensions to Schedule 1 or Schedule 2 development be screened?

Applicants and local planning authorities need to consider if significant environmental effects may result from an existing or approved [Schedule 1](#) or [Schedule 2](#) development being changed or extended.

[More guidance on changes or extensions to existing development.](#)

Paragraph: 022 Reference ID: 4-022-20170728

As the proposal is an extension of an existing development which falls under Schedule 2 development, the combined impact of the existing and new development would need to be considered. There is no information on current emissions/ discharges and whether any thresholds are already exceeded, or have been, and whether current safeguards are effective.

When should cumulative effects be assessed?

Each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development.

Paragraph: 024 Reference ID: 4-024-20170728

Potential cumulative impacts on sensitive receptors such as the Churnet Valley SSSI are also unknown. Several other developments in the area are near to the SSSI, and other factors are clearly impacting the site- current data shows that most of the SSSI is in unfavourable condition, albeit 'recovering', but the areas nearest to the proposal site are unfavourable without change. The current condition of ancient woodlands, Local Wildlife Sites and water courses in the area is unknown.

We advise that more information is required on the efficacy of potential mitigation measures, existing thresholds, impacts of the current plant, and potential cumulative impacts on sensitive receptors

Site-based impacts

The PEA has addressed our first three points in terms of issues requiring information in any future planning application (provision of a PEA, bird survey and badger survey). The other points remain necessary to provide within any future application.

1. Details of biofilter bed.
2. Drainage plan, including sustainable drainage features with habitat creation.
3. Biodiversity Impact Assessment (BIA) using latest DEFRA metric.
4. Arboricultural survey.
5. Soft landscaping plan detailing enhancements and full planting details.
6. Enhancement of existing hedgerow to create/enhance wildlife corridor

Regards,

Kate Dewey BSc (Hons) MCIEEM

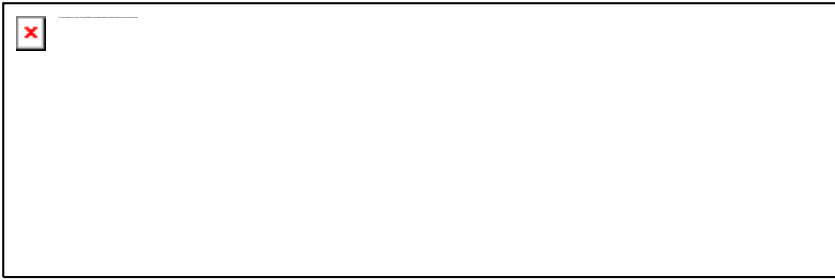
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Planning consultations- please send to planning@staffs-wildlife.org.uk

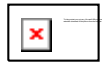
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On Thu, 18 Nov 2021 at 08:00, Kate Dewey <k.dewey@staffs-wildlife.org.uk> wrote:

Ref number SMD/2021/0628

Application Location John Pointon and Sons, Bones Lane, Cheddleton, Staffordshire, ST13 7BT

Application description EIA Screening Opinion Request: food processing facility/edible bone processing factory

Site size hectares 2.9

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.

Documents reviewed:

- ES Screening Report Rev00 September 2021
- Extended Phase 1 Habitat Survey (Middlemarch Environmental, April 2011) from SMD/2011/0063

Although the application is for a screening opinion, we would like to include some additional ecology comments to ensure the development considers habitat creation/retention and enhancements at the design stage.

SUMMARY

Ecology requirements

- Preliminary Ecological Appraisal (PEA) – *understood to be in progress*.
 - Should consider adjacent habitats outwith the red line boundary.
 - Any phase 2 surveys identified by the PEA
 - Any other species or habitat mitigation, compensation, and enhancements.
- Bird survey (including winter survey).
- Badger survey.
- Details of biofilter bed.

- Drainage plan, including sustainable drainage features with habitat creation.
- Biodiversity Impact Assessment (BIA) using latest DEFRA metric.
- Arboricultural survey.
- Soft landscaping plan detailing enhancements and full planting details.
- Enhancement of existing hedgerow to create/enhance wildlife corridor
- Construction Environmental Management Plan (CEMP).
- Long-term habitat management plan.

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

The site lies within the Churnet Valley SSSI impact risk zone and has hydrological links to the Churnet Valley area. Due to potential air quality and water discharge considerations, Natural England and the Environment Agency should also be consulted.

Several important habitats/sites are situated downstream from the proposed development site that are connected hydrologically due to the onsite drainage ditch and nearby stream. This includes the Churnet Valley SSSI, Local Wildlife Sites of county importance, and areas of ancient woodland.

Wildlife corridors

The hedgerow with trees along the south-western boundary could be a commuting corridor for bats, hedgehogs, invertebrates, and various other animals. This feature should therefore be protected and enhanced as part of the development. The proposed layout shown within figure 2-2 of the screening report would make this difficult, due to the proximity of the buildings and hard-standing to this feature. An alternative layout may be required to maximise habitat retention and enhancement.

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 proposal appears likely to result in a net loss of green areas, therefore a Biodiversity Impact assessment using Defra metric 3.0 will be required. The design should be adjusted where necessary to provide a net gain, using land off-site if necessary.

Landscaping

A landscaping scheme will be required incorporating good quality habitats. This could be an opportunity to offer access to nature for workers via a 'green route' around the site. Research has shown that access to green space within the work day reduces stress levels and increases productivity.

Opportunities:

- Hedgerow enhancement – protect and enhance existing hedgerow with additional planting and grassland buffer strip to act as a wildlife corridor linking up wooded areas. To benefit bats, insects, mammals, birds, amphibians.
- Grassland enhancement – enhance retained areas to increase wildflower diversity.
- 'Green route' around the site offering access to nature for workers via circular walk.
- Wetland features as part of SuDS scheme.
- Habitat piles (e.g. deadwood, brash, stones).
- Use of subsoil for habitat creation/enhancement.

A long-term management plan will also need to be secured.

Drainage

A detailed drainage plan will be required, to be informed by a ground assessment to determine suitable drainage designs.

Surface water drainage for the development should incorporate sustainable drainage features that also offer habitat for wildlife. The drainage plan should follow principles set out in the CIRIA C753 SuDS Manual. This should be considered at the earliest design stage of the development. Impacts to downstream habitats will need to be considered and mitigated for, by including reed beds to filter pollutants for example.

Opportunities:

- Permeable surfaces for parking areas such as grasscrete where possible.
- Infiltration via landscaping such as roadside swales.
- Use of existing ditches (if present) along boundaries.
- Avoid pipes in favour of open features where possible.
- Proposed attenuation pond could be an opportunity to increase biodiversity.
- Rain gardens, reed beds to further filter pollutants and support wildlife.

The proposals include a biofilter bed. We are unsure what this includes as limited information has been made available. Further design information will be required to assess potential impacts/opportunities.

SPECIES

We understand that a PEA has been commissioned. With that in mind the comments below are limited until we have reviewed the PEA report, which may identify further issues.

Bats

Bats are likely to utilise the woodland edge and linear features around the edge of the proposed development site. The current layout could fragment commuting corridors, particularly the line of trees along the western boundary that links to the woodland. We would want to see a good quality native hedgerow with additional tree planting to enhance this habitat. To enable this, an alternative layout may be required, with the buildings and hardstanding moved further towards the existing facility.

Birds

The site has the potential to support lapwing and other ground nesting birds. A previous ecology survey of an area adjacent to the proposed development recorded lapwing nearby, with records also present in the area. A breeding bird survey (including winter) will be required.

The field may provide hunting habitat for barn owl.

The proposed layout also appears to remove areas of planted vegetation/screening and areas of scrub, all of which could support nesting birds.

Badgers

There is potential for badgers to be using the adjacent woodland, hedgerows, and the field itself for foraging and commuting. The adjacent areas of woodland/scrub and hedgerows should be assessed during the PEA due to the proximity to the development.

Hedgehogs

Hedgehogs could be impacted by scrub/ruderal/tree clearance. A precautionary method statement will be required, with provisions for habitat enhancements around the site. This should include a commuting corridor to be secured along the existing hedgerow, with suitable habitat piles included.

SUSTAINABLE DESIGN

Nature-based solutions such as green roofs and green walls, water recycling, solar panels, adequate insulation and use of sustainable materials should all be considered. Green roofs are particularly good at cooling buildings which may be beneficial for industrial processes.

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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