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**From:** Curley, Jane  
**Sent:** 12 January 2022 10:54  
**To:** Planning Comments (SMDC)  
**Subject:** FW: Land At Bridge End SMD/2021/0113

**Categories:**

Jane Curley (Mrs)  
Senior Planning Officer (Majors & Commercial)  
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Mobile 07794 768397

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**From:** Kate Dewey  
**Sent:** 22 December 2021 08:00  
**To:** Curley, Jane  
**Cc:** Steve Massey Alex Fitzroy <; SCC Flood Team <>; Richard Millington >  
**Subject:** Re: Land At Bridge End SMD/2021/0113

**SMD/2021/0113**

**Land At Bridge End, Macclesfield Road, Leek, Staffordshire, ST13 8LG**

**Erection of 12no. Bungalows**

**1.48 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 required

Required prior to determination:

1. GCN surveys of nearest two ponds as specified in the PEA
2. Bat inspections of any suitable trees to be removed; activity surveys if crevices found.
3. Biodiversity Net Gain assessment using Defra metric 3.0

Secure via condition/s should approval be granted:

4. Detailed landscaping, habitat enhancement, surface drainage scheme.
5. Pre-commencement badger check
6. Reptile and nesting bird precautions method statement
7. Species mitigation measures including reptile and bird habitats, invertebrate features, bat boxes etc. as specified in the PEA

## **Documents reviewed:**

- Preliminary Ecological Appraisal February 2021 by Elite Ecology
- Flood Risk Statement and Surface Water Management Report June 2021 by Northern Structural Services

## **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.'

A Biodiversity Impact Assessment using Defra metric 3.0 is required to ensure a net gain is achieved and to inform the design – this has not been supplied.

We advise that to maximise habitat value, all communal areas of grassland should be wildflower areas, cut shorter where necessary. As much woody material and brash from tree clearance to be retained on site as habitat piles/ dead hedges alongside newly planted hedges, for shelter and temporary bird nesting features. The nature reserve area should remain unshaded from the south to allow invertebrates/ reptiles to bask- reduce scrub planting on the southern boundary.

### **Drainage and SuDS**

The proposed surface drainage is acceptable; if possible the proposed pipe alongside the footpath should be an open ditch to add habitat and filtration of water. Landscaped areas adjacent roadways could also be designed to accept some run-off as 'rain gardens'. Such surface features would qualify as 'bioswales' within any biodiversity metric and help add habitat value.

## **SPECIES**

The PEA advises further surveys are required for GCN, bats and other species. GCN surveys are required for the two ponds connected to the site by favourable habitat- as if present, it is likely a licence would be required. Trees to be removed should be subject to further survey to determine any with bat potential, which may then need activity surveys,

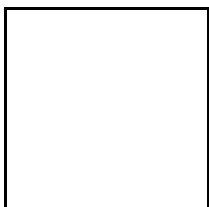
Advised surveys for invertebrates, reptiles and nesting birds are not necessary at this stage. The habitat does not have enough bare ground for scarce invertebrates, and adequate new habitats can be created. There is enough habitat elsewhere for reptiles to escape to, as long as precautions are taken to avoid direct harm to them during construction, and adequate habitat is created for them to return; survey data would not alter the precautions to be taken. Clearance should take place outside of the bird nesting season, or, checks made for birds before clearance.

Recommendations in the PEA for species enhancement should be secured via condition to be included within a detailed landscaping plan.

Regards,

**Kate Dewey BSc (Hons) MCIEEM**

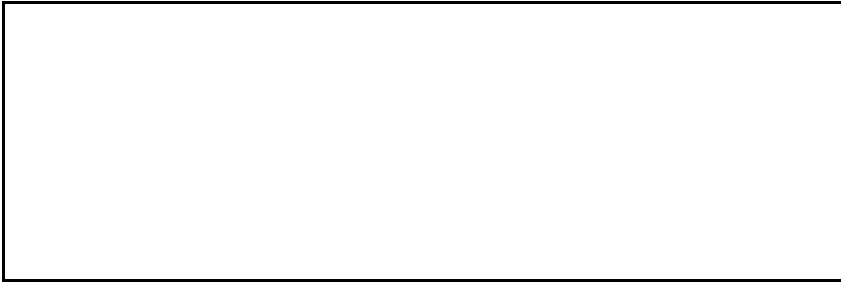
**Senior Planning Officer**



07494852383

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2 Attachments

On Tue, 14 Sept 2021 at 17:54, Kate Dewey wrote:

**SMD/2021/0113**

**Land At Bridge End, Macclesfield Road, Leek, Staffordshire, ST13 8LG**

**Erection of 12no. Bungalows**

**1.48 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 required

Required prior to determination:

1. Preliminary Ecological Appraisal (PEA)
2. Biodiversity Net Gain assessment using Defra metric 3.0
3. Local Wildlife Site assessment if necessary from preliminary survey
4. Outline drainage proposals
5. Outline of habitat and species mitigation proposals

Secure via condition/s should approval be granted:

6. Detailed landscaping, habitat enhancement, surface drainage and species mitigation measures.

**Documents reviewed:**

- Proposed site plan BL 104 Rev H 27Jan21
- Design and Access Statement February 2021

**DESIGNATED WILDLIFE SITES**

There are no designated sites nearby that would appear to be potentially impacted, however not all high-value habitats have been designated in the district. There are semi-natural habitats adjacent the site that may be important, and the site is part of a corridor of habitats along the River Churnet.

The site itself appears to support a range of semi-natural habitats and so could potentially meet LWS criteria- a PEA should consider this.

**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'

Given the lack of baseline information on the site's biodiversity value, it is not possible to judge whether a net loss or gain would occur. The proposed plans would appear to suggest that a net loss is likely, unless landscaping is of high habitat value. A Biodiversity Net Gain or Biodiversity Impact Assessment using Defra metric 3.0 is required to ensure a net gain is achieved and to inform the design.

**Drainage**

The permeable surfaces and proposed pond for surface drainage is welcomed. The site will need to use an integrated SuDS design to manage water across the site, ideally avoiding pipes in favour of open swales. Levels will also determine location of features. This could also benefit the landscaping design and add to biodiversity, so is important to consider at this stage. As this is a full application, further information on surface drainage should be provided.

Foul drainage proposals are unknown. Given the proximity to the River Churnet, further details are required.

**Ground works, level changes**

It is not clear how the land will be levelled. Use of subsoil for habitat creation is recommended.

**SPECIES**

No species surveys have been submitted. Due to the habitats on site and ponds nearby, the site has potential for several protected species, particularly badger, great crested newts, reptiles and birds, which should all be covered in a PEA.

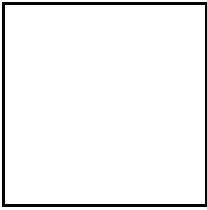
**SUSTAINABLE DESIGN**

Consideration should be given to roof design and building orientation to facilitate solar panel installation. The current design does not maximise opportunities.

Regards,

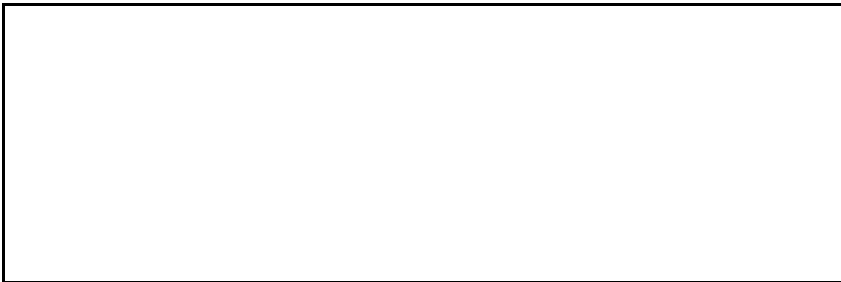
Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



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