

From: [Kate Dewey](#)
To: [Berry, Ailsa](#); [Planning Comments \(SMDC\)](#)
Cc: [Alex Fitzroy](#); [Steve Massey](#); [Richard Millington](#)
Subject: SMD/2021/0727 Land at Simfield Farm
Date: 14 January 2022 13:22:17

Ref number SMD/2021/0727

Application Location Land at Simfield Farm, Greens Lane, Werrington, Staffordshire

Application description Formation of equestrian Manege

Site size hectares 0.34

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 or amendments required to ensure a biodiversity net gain is achieved.

Required prior to determination:

1. Further habitat enhancements **or** Biodiversity Impact Assessment (BIA) metric.
2. Details of spoil disposal

Secure via condition should approval be granted:

3. Amphibian method statement, as per recommendations within section 5.3.5 of the PEA report.
4. Precautions for nesting birds if any potential nesting habitat is to be disturbed.
5. Precautions for mammals, in relation to material storage, holes, and pipes.
6. Details of pollution prevention during construction phase.
7. Root Protection Areas (RPAs) for existing hedgerow and trees.
8. If any lighting is proposed, a bat friendly lighting scheme will be required.
9. Drainage scheme details

Documents reviewed:

- Application Form
- Site Plan as Existing 1740-00
- Site Plan as Proposed 1740-02
- D&A Statement
- Location Plan
- PEA – Elite Ecology, December 2021
- Planning Statement

- Plans and Elevations 1740-01

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

No impacts to wildlife sites are anticipated due to the limited scale of the development.

HABITATS

Habitat Survey

A PEA has been conducted which adequately covers the proposed development site.

No habitats of importance that could be impacted by the works were identified. However, the works will result in the loss of improved grassland. Albeit of species-poor diversity, the amount of grassland to be lost will have an impact on the wider ecological network.

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 clear that a net gain in linear habitats will be achieved with the proposed hedgerow planting, this is welcomed. However, good practice states that a net gain must be achieved in habitat units also. The other enhancements are welcome, but It is not clear whether they are sufficient to achieve a net gain in habitat units due to the amount of grassland to be lost. We advise that a larger area of grassland enhancement is needed to ensure that a net gain in both units is achieved. This could include the strips of grassland between the existing/ proposed hedgerows and proposed manège, but may require another section elsewhere too. Enhancing these additional areas of grassland for increased wildflower diversity likely to be enough along with the other proposed enhancements. **Additional grassland enhancement is required prior to determination to secure a net gain, or alternatively a Biodiversity Impact Assessment (BIA) using Defra metric 3.0 or above, or small sites metric, is to be submitted to evidence that the current proposals are sufficient.**

Drainage

The development does not appear to be within the flood plain.

The application form states that a soakaway is proposed for surface water discharge. Further details have been provided within drawing ref 1740-01. This states that the surface runoff from the manège will ultimately be discharged into the existing ditch on site. We advise that a surface channel to mimic a natural habitat is utilised to discharge the water into the existing ditch, rather than a pipe where possible.

Ground works, level changes, soil

Details of spoil disposal are required to ensure this does not impact on any habitats. Subsoil may be reused for habitat creation.

We would also like to see pollution prevention measures for the construction phase, to ensure silt does not pollute downstream habitats via surface runoff. **Secure via condition.**

Trees/hedgerows

To protect existing the existing hedgerow and trees on site, we recommend that root protection areas (RPAs) are in place prior to any works commencing, as set out in British Standard BS 5357 (2012) 'Trees in Relation to Design, Demolition and Construction to Construction'. This will also help to minimise disturbance to any species utilising this habitat during construction. **Secure via condition.**

SPECIES

Bats

If any lighting is proposed, this must avoid light spill onto bat foraging, commuting, and roosting habitat, including any proposed bat boxes. **Secure via condition.**

Birds

As per the ecology report, precautions should be in place if any works are to occur that may disturb the existing hedgerow or other dense vegetation on site. This will be in the form of timing constraints to avoid the nesting season or an inspection by an ecologist no more than 48 hours prior to works commencing. **Secure via condition.**

Great Crested Newts, Amphibians, Reptiles

The ecology report found there to be suitable habitat on site, including a ditch just outside the red line boundary. Precautions have been recommended within section 5.3.5, including a method statement. **Secure via condition.**

Mammals

General precautions should be in place in relation to any holes dug into the ground or exposed pipework as per section 5.3.4 of the ecology report. **Secure via condition.**

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



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