
From:
Sent: 31 January 2022 08:00
To:)
Cc:
Subject: SMD/2021/0536 Land at Barnfields Industrial Estate

Ref number SMD/2021/0536

Application Location Land at Barnfields Industrial Estate, Sunnyhills Road, Leek, Staffordshire, ST13 5RJ

Application description Reserved matters application for approval of appearance, landscaping, layout, and scale to provide: 157 residential dwellings (Class C3) providing a mix of two, three and four bedroom houses, and two bedroom apartments; 6 x live / work units (Sui Generis); 1 x public house / restaurant / café (Sui Generis / Class E(b)); a marina / basin and associated boating facilities with 13 berths; associated works including internal road network, associated highway works, drainage infrastructure, landscaping, open space, play area, pedestrian, and cyclist links; land reserved for future railway station with associated heritage / railway activities building/s and car parking; and land reserved for future link road including associated landscaping. The application is submitted pursuant to outline planning permission SMD/2014/0750.

Site size hectares 6.59

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.

In addition to our previous comments, the following are also required prior to determination:

1. As per the updated PEA report by Urban Green:
 - a. Further bat surveys on all low, moderate, and high potential buildings.
 - b. Reptile surveys.
 - c. Otter survey.
 - d. Preliminary invertebrate study, and further surveys if required.
2. Amended layout to facilitate more habitats to act as a buffer along southern boundary and better access to nature.
3. Outline details of retaining structure and/or embankment works and plans.

As per our previous comments the following are still outstanding prior to determination:

4. Biodiversity Impact Assessment (BIA) to secure Biodiversity Net Gain (BNG) – this should now consider offsetting off-site.
5. Detailed surface and foul drainage plans, incorporating sustainable drainage features and complying with conditions 31 and 32 of outline.
6. Amended plan showing access links to adjoining open spaces.
7. Detailed plans for landscaping, habitat enhancement/compensation for net gain habitats.

Secure via condition should approval be granted:

1. Barn owl method statement.
2. Amphibians Reasonable Avoidance Measures (RAMs).
3. Timing constraints for nesting birds or Ecological Clerk of Works (ECoW) to be present.
4. Nest box enhancements for birds shown on updated plan.
5. Sensitive lighting scheme, mitigating for light spill onto the River Churnet and associated habitats.
6. Long term management plan for proposed habitats.

7. Construction Environmental Management Plan (CEMP), to include mitigation for pollution, species, and any additional mitigation requirements pending additional surveys.

8. As per outline SMD/2014/0750 condition 29 – a phased contamination remediation strategy is to be approved prior to any works commencing.

Further recommendations may follow pending further survey effort.

Documents reviewed:

- AIA (December 2021)
- General Arrangement Plans (UG_1145_LAN_SL_DRW_01 & 02)
- Hard Landscape Plan (UG_1145_LAN_HL_DRW_03)
- Soft Landscaping Plan (UG_1145_LAN_SL_DRW_04, 05, & 06)
- PEA (July 2021)

HABITATS

Open Mosaic Habitat on Previously Developed Land (OMHPDL)

The updated PEA found that a 2.4 ha area of the site has become OMHPDL, a UK priority habitat. This mosaic of habitats is valuable due to the structural and floral diversity it offers. Areas of this habitat should be retained or recreated within the development where possible, through suitable landscape design.

Biodiversity Net Gain

Given the updated habitat information, the proposals are now more likely to result in a net loss, due to the loss of the open mosaic priority habitat, therefore a Biodiversity Impact assessment using Defra metric 3.0 is still required.

Unless a change of layout with additional green spaces is implemented, it is likely to be necessary to offset the impacts by enhancing a nearby site. There may also be opportunities along the river, existing footpath, and grassland which are part of the Ladderedge Country Park. Agreement would need to be reached with the relevant parties.

We advise that enhancement of the adjacent pond to the south (P1) is considered, as it appears to be of limited value to wildlife at present and could also be more visually appealing. With suitable planting and other associated habitat features this could help to mitigate for the loss of invertebrate habitat on site (pending further survey results).

BIA and consideration for offsetting sites required prior to determination.

Landscaping and habitat creation

Also referred to within our previous comments, the southern boundary from plots 11 through to 25 are not suitable. Hedgerows with trees should be used to act as a buffer between the development and adjacent habitats. As an example of a potential impact, any security lighting installed by future residents within the rear of the properties could impact on adjacent habitats and species within the current layout. This includes bats that are likely to forage and commute along the river and its associated riparian habitat. Ideally the layout should be altered slightly, so that some of the habitats proposed for the northern boundary are moved to the southern boundary to create more of a buffer. The public footpath that runs adjacent to the site to the south is likely to see an increase in footfall, and habitats such as the river and its banks, grassland, trees, and pond will all see additional disturbance. A contribution towards footpath and habitat maintenance may be appropriate. ***Amended layout with increased habitat provision along the southern boundary required prior to determination.***

Access to nature

From a recreation viewpoint, it is unclear whether there are any linkages to existing footpaths, particularly with the uncertainty regarding the marina plans. The current layout is therefore very closed off despite benefiting from surrounding green spaces. If the proposed link road goes ahead, this could mean residents have to walk along a busy road to access green spaces. There does not appear to be a circular green route around the site, with some footpaths appearing to be dead ends or used only for access. There are

no obvious access points to the Ladderedge Country Park, canal path, or Leekbrook line without walking along roads. ***Amended layout to show better access to nature required prior to determination.***

Surface Drainage and Flooding

As per our previous comments, detailed surface drainage proposals still do not appear to have been submitted. Condition 32 of the outline planning decision has not been met. Surface drainage proposals need to follow SuDS principles. Due to potential impacts to nearby habitats and priority species using the River Churnet, ***full surface drainage details are required prior to determination.***

Ground works, level changes, soil

Due to sensitive adjacent habitats and priority species, outline details of any embankment works including retaining structures for the southern boundary should be provided at this stage to determine potential impacts. Pollution and disturbance of the River Churnet habitats and species are of particular concern.

Required prior to determination.

SPECIES

The updated species comments below are based on the updated PEA.

Bats

Buildings 2, 3, 6, 7, and 9 have bat roost potential (low to high). Please refer to section 6.2 of the report for information. ***Bat surveys of buildings required prior to determination.***

Otter

Staffordshire Wildlife Trust recorded otter tracks on the banks of the River Churnet adjacent to the development on the 21st January 2022. The PEA recommends an otter survey is undertaken. We second that recommendation so that impacts can be fully assessed. ***An otter survey is required prior to determination.***

Reptiles

The site was found to have suitable reptile habitat. Further surveys have been recommended to determine impacts. Further details within section 6.3 of the PEA report.

Reptile surveys required prior to determination.

Invertebrates

Due to the variety of structural and floral diversity found within the open mosaic habitat on site further assessment for invertebrates has been recommended.

A preliminary invertebrate survey is required, followed by further surveys if deemed necessary.

Invertebrate surveys required prior to determination.

Birds

As per the updated ecology report, "Any site clearance works (including foundation removal and buildings) should be undertaken outside of the breeding bird season (March to September, inclusive). If this is not possible, a suitable experienced ecologist should check the habitat for breeding bird activity no more than 48 hours before clearance. If nesting activity is found, nests must be left in situ until the young have fledged." ***To be secured via condition.***

In addition to this, we want to see a number of bird boxes included in suitable locations throughout the development. A minimum of 1 in 5 houses should include a feature. Consideration should be given to integrated brick features where possible to ensure longevity. These must be detailed on an updated landscaping plan. ***Bird enhancements to be secured via condition.***

Barn Owl

Buildings 1 and 8 were found to have nesting potential. Therefore, a barn owl method statement has been recommended. **Secure via condition.**

Great Crested Newts, Amphibians

The PEA states that species such as common toad could utilise the site. Therefore, Reasonable Avoidance Measures (RAMs) have been recommended to be included within the CEMP. ***RAMs to be secured via condition.***

Construction Environmental Management Plan (CEMP)

From an ecological perspective this should include pollution prevention measures, species precautions including any timing constraints, good site housekeeping to avoid creating temporary habitat, and other details as required pending additional survey effort.

To be secured via condition.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



Planning consultations- please send t

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