

From: [Kate Dewey](#)
To: [Berry, Ailsa](#)
Cc: [Alex Fitzroy](#); [Richard Millington](#); [Steve Massey](#); [Planning Comments \(SMDC\)](#)
Subject: SMD/2021/0720 Land at 58 Uplands Croft
Date: 10 February 2022 08:00:57

SMD/2021/0720

Land At 58, Uplands Croft, Werrington, ST9 0LF

Residential development for the erection of 2 No Detached Single Storey Dwellings with garages

0.18 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 and amendments required.

Required prior to determination:

1. Outline sustainable drainage plan with surface wetland features
2. Biodiversity net gain metric
3. Landscaping plan showing habitat and species enhancements.
4. Amended layout to avoid impacts to tree RPAs, and reduce length of access road to avoid development within 10m of the watercourse and loss of green space.
5. Confirmation as to whether T12 and any other trees to be removed have any potential for bat roosting.
6. Survey of watercourse for otter and water vole if brook corridor is not avoided.

Secure via condition should approval be granted:

1. Further habitat creation details as required
2. CEMP including species protection measures
3. Sensitive lighting scheme
4. Habitat management plan covering at least 25 years

Documents reviewed:

- Proposed site layout
- Herptile Survey Report July 2021 Elite Ecology
- Preliminary Ecological Appraisal October 2020 Elie Ecology (for SMD/2019/0533)
- BS5837:2012 Tree Survey and Arboricultural Impact Assessment August 2021 Elite Ecology

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

No designated wildlife sites would be affected, however the site is adjacent a watercourse which is an important local ecological corridor.

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 due to the overall increase in built areas and loss of semi-improved grassland and shrubs. Therefore a Biodiversity Net Gain assessment using Defra metric 3.0 (or most recently adopted version) is required.

In order to maximise wildlife value of landscaping, the following should be considered: Short flowery lawn mix for amenity grassland, climbers, fruit trees, new native hedges on boundaries, enhance existing hedges with trees/ additional species, re-seeding disturbed areas with wildflower meadow mix, and creating wetland features for surface and treated water discharges.

Within the open space at the northern end of the site, acidic grassland, marshy grassland, pond/wetland features and some scrub edges would be appropriate habitats given conditions on the site. Features for birds, bats, amphibians, reptiles and invertebrates should be included, see comments below.

If there is a deficit in biodiversity value, site scale and layout could be amended, or a contribution to enhance an area off-site should be made.

Long-term maintenance and management of habitats should be secured for at least 25 years to deliver net gain.

Trees

T12 is proposed to be removed. The tree report also recommends that Plot 2 be re-configured to avoid the RPA of T11 as the garage/ parking area would impact the roots of this tree. The need for ground protection from RPAs of T1 and T2 could also be avoided by reducing the access road length and reconfiguring the driveway of Plot 2.

All felled material and brash from the site should be retained to create log and habitat piles within the retained open space, and/or hedgerows.

Drainage

The site suffers from some surface water flooding according to <https://check-long-term-flood-risk.service.gov.uk/> As well as increasing non-permeable areas, the development will potentially impact on water quantity and quality entering the Causley brook.

No drainage details are submitted, although the application form states that both surface and foul water will be discharged to the existing sewer network. Adding surface water to an existing sewer is not ideal, as this re-directs water from its natural flow patterns and can lead to additional loads on piped systems. Sustainable drainage is generally more cost effective and maintains natural hydrology, while also creating greater habitat value in a small space. We recommend that an outline surface drainage plan is required, to show how surface water can be adequately managed on the site, and how this could contribute to biodiversity gain.

We suggest that source control such as permeable surfaces, water butts and infiltration into landscaped areas should be designed into the scheme. Roadside swales, a small pond and wetland area that drains naturally towards the brook would be appropriate for the site.

SPECIES

Bats

Confirmation is required as to whether T12 and any other trees to be removed have any potential for bat roosting. Lighting of green areas and especially the brook corridor must be avoided as these are areas where bats will forage- a lighting plan will need to be secured via condition.

Otter and Watervole

Disturbance or works to the brook banks or within 10m should be avoided as far as possible, with any drainage features constructed away from the brook. Surface water

should be allowed to drain naturally in an open channel or spillway over marshy grassland to filter into the brook, avoiding any constructed outfall. Should works be proposed within 10m of the banks, further survey for otter and water vole will be required.

Reptiles and Amphibians

While no reptiles were recorded, possibly because of the removal/ weed killing of vegetation on site, the area is suitable and the presence of reptiles cannot be ruled out. However, two amphibian species, Common Toad (species of principal importance for conservation under the NERC Act 2006) and Common Frog were found to be present. Precautionary measures for site clearance, as well as creation of suitable habitats (pond/ wetland and log piles, basking areas, vegetation piles) should be secured as part of a CEMP and habitat creation scheme.

Birds

General protection measures for birds apply which may be secured via condition. Provision of bird boxes and nesting features within new dwellings and retained trees, as well as additional native hedgerow/ shrub planting would enhance bird habitat.

Badgers

Protective measures for any large mammals in the area should be included in a CEMP.

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