

From: [Johnston, Christopher](#)
To: [Planning Comments \(SMDC\)](#)
Subject: FW: SMD/2021/0784 Land East of, Sugar Street
Date: 31 May 2022 17:20:32

From: Kate Dewey <k.dewey@staffs-wildlife.org.uk>
Sent: 31 May 2022 16:15
To: Johnston, Christopher <Christopher.Johnston@StaffsMoorlands.gov.uk>
Cc:
Subject: Re: SMD/2021/0784 Land East of, Sugar Street

Ref number SMD/2021/0784

Application Location Land East of, Sugar Street, Rushton Spencer, Staffordshire
SK11 0RN

Application description Erection of 4no. dwellings and associated works.

Site size hectares 0.42

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 – No objection subject to conditions.

Secure via condition should approval be granted:

1. BNG metric and detailed landscaping scheme incorporating meadow enhancement, details of species features and locations for bats, birds, hedgehogs, reptiles and invertebrates as laid out in the PEA report (Charnia Ecology, October 2021)
2. Long-term habitat management plan to secure net gain.
3. As per the ecology report by Charnia Ecology:
 - a. Bird precautions to be followed as per sections 88 – 91, including timing of works.
 - b. Amphibian and mammal precautions to be followed as detailed within sections 83, 84, and 86.
 - c. Sensitive lighting scheme, as per sections 109 – 112.
4. Reptile protection method statement, including retained refuge areas and supervised clearance works.
5. Detailed drainage scheme

Documents reviewed:

- 2127 AL 06 A Site Plan as Proposed

- 2127 AL 10 A Indicative drainage plan
- 2127 AL 11 A Strategic Landscape Plan

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 amended plans retain more grassland and this would appear to be sufficient to provide a net gain, as long as all areas of grassland area enhanced with locally sourced seed. This can be achieved simply by preparing the existing sward by cutting and light harrowing, and sowing seed or hay from a donor meadow (usually cheaper than commercial seed). This needs to be included in a detailed landscaping plan, and a biodiversity net gain calculation provided, using the latest Defra metric.

A habitat management plan will be required to secure net gain habitats for a minimum of 30 years.

As per our previous comments, details of species enhancements will need to be submitted via further plans which may be conditioned.

Drainage

The indicative drainage plan appears to be suitable from an ecological perspective, but regard must be given to comments from other consultees regarding groundwater protection and surface water treatment. Additional surface features such as a lined reedbed or swale could be considered at the lower end of the site as part of a detailed drainage plan.

In order for the permeable landscaped areas to absorb some run-off, they would need to be flush with the hard surfacing without a curb, or permeable curb materials used. Underground geocellular storage could be considered to provide more storage and filtration. Water butts should also be provided on each home.

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

On Wed, 26 Jan 2022 at 08:00, Kate Dewey <k.dewey@staffs-wildlife.org.uk> wrote:

Ref number SMD/2021/0784

Application Location Land East of, Sugar Street, Rushton Spencer, Staffordshire SK11 0RN

Application description Erection of 4no. dwellings and associated works.

Site size hectares 0.42

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 on ecological impact required.

Required prior to determination:

1. Biodiversity Impact Assessment to evidence a biodiversity net gain.
2. More information on site hydrology and proposed drainage to ensure feasibility.
3. Updated landscaping scheme incorporating SuDs and habitat enhancements.

Secure via condition should approval be granted:

1. Long-term habitat management plan to secure net gain.
2. As per the ecology report by Charnia Ecology:

- a. Species enhancements for bats (sections 105, 106), birds (sections 91, 107, 108), hedgehogs (section 91, 102), and invertebrates (section 92) – detailed and shown within an updated landscaping plan.
 - b. Bird precautions to be followed as per sections 88 – 91, including timing of works.
 - c. Amphibian and mammal precautions to be followed as detailed within sections 83, 84, and 86.
 - d. Sensitive lighting scheme, as per sections 109 – 112.
3. Reptile protection method statement, including retained refuge areas and supervised clearance works. Reptile habitat should be enhanced overall as part of the proposals.

Documents reviewed:

- Plans 2127 AL 01 – 50
- Application Form
- Arboricultural Report
- Design & Access Statement
- Existing Site Plan
- Planning Statement
- PEA Final Issue (Charnia Ecology, October 2021)

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

Due to the limited scale of the development no impacts to nearby sites are anticipated, providing adequate drainage infrastructure is implemented.

The site forms part of the local ecological network linking nearby wildlife sites and other grassland habitats. The grassland has some diversity, but does not appear to meet local Wildlife Site criteria.

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'

It is not clear whether the proposals would achieve a net gain due to the amount of semi-improved lowland meadow to be lost. Therefore, a Biodiversity Impact Assessment using Defra metric 3.0 is required for the avoidance of doubt **prior to determination**. If a balance is not possible on the site, additional land off-site should be enhanced where available and indicated on a plan.

A landscaping plan is included, and the ecology report includes steps to achieve this. We recommend that the enhancements detailed within sections 102 and 103 are followed. However,

we would recommend that retained grassland areas are seeded using a locally sourced seed or hay from an existing diverse meadow where possible, rather than a seed mix. The plan should also include any above ground SuDS features, and incorporate species requirements as necessary.

Updated landscaping plan required prior to determination

A habitat management plan will be required to secure net gain habitats for a minimum of 30 years.

To be secured via condition.

Drainage

The indicative drainage plan shows permeable surfaces, and proposed locations for a sewage treatment plant and a rainwater harvesting tank, however, no further details are provided. Due to surface water flooding issues reported by residents, the presence of a natural spring and possible channels connecting off the site, further information on site hydrology and proposed drainage feasibility are required. As well as avoiding downstream impacts, a more natural design following SuDS principles would also create additional habitat.

Ideally in place of underground structures this would include swales, infiltration basins and marshy areas mimicking natural waterscapes which will store and filter water. Formal landscaping could also infiltrate water using 'rain garden' areas, and green roofs could be considered. Reinforced grass may be suitable for some parking spaces. The drainage needs to be achievable alongside biodiversity net gain habitats so both should be integrated in the design. ***Further information on site hydrology and drainage design plans required prior to determination.***

SPECIES

Bats

The ecology report did not recommend any further survey. However, a sensitive lighting plan and enhancements for bats are recommended and should be followed in full.

Great Crested Newts, Amphibians

The ecology report did not recommend any further survey effort. General precautions are recommended in sections 83 and 84. ***To be secured via condition.***

Reptiles

The ecology report found suitable grass snake habitat on site and recommends further surveys. We have considered whether this is necessary at this site, regarding the potential of the site to hold a significant/ designation-worthy population, legal protection afforded to reptiles from killing and injury, and duty to conserve priority species populations.

Given the size of the site and suitable habitats surrounding it, we consider that it would not be the sole habitat of a significant reptile population, and that any reptiles present could move to safety during construction if provided with fenced retained refuge habitat/ migration routes and appropriate site clearance methods. Therefore, no translocation would be needed, and surveys would not add vital data. Habitat retention and enhancements for reptiles can be provided within landscaping as part of overall biodiversity net gain. ***Reptile protection measures and method statement to be secured via condition.***

Badgers

The ecology report did not recommend any further survey. General precautions are recommended within section 86. ***To be secured via condition.***

Birds

The ecology report did not recommend any further survey effort. However, precautions during site

clearance and enhancements for birds are recommended in the form of nest boxes. These are to be implemented in full.

Hedgehogs

Records exist in the area. The ecology report recommends enhancements to support this species (sections 91 and 102).

Invertebrates

The ecology report found that the development will lead to habitat loss and deterioration for common and widespread invertebrate species. Therefore, invertebrate enhancements are recommended within section 92 of the report.

Species enhancements for bats, birds, hedgehogs, invertebrates, and reptiles to be shown on updated landscaping plan.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer

| 07494852383

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