

From: [Lisa Jackson](#)
To: [Planning \(SMDC\)](#)
Subject: FW: SMD/2021/0565 Land Adj The Bungalow, High Street, Kingsley
Date: 22 August 2022 11:09:48

Please note that my usual working days are Tuesday – Friday.

From: Kate Dewey <k.dewey@staffs-wildlife.org.uk>
Sent: 22 August 2022 11:05
To: Lisa Jackson <Lisa.Jackson@staffs-moorlands.gov.uk>
Subject: Fwd: SMD/2021/0565 Land Adj The Bungalow, High Street, Kingsley

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer

Planning consultations- please send to planning@staffs-wildlife.org.uk

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----- Forwarded message -----

From: **Kate Dewey** <k.dewey@staffs-wildlife.org.uk>
Date: Thu, 18 Aug 2022 at 18:11
Subject: Re: SMD/2021/0565 Land Adj The Bungalow, High Street, Kingsley
To: Lisa Jackson <Lisa.Jackson@staffs-moorlands.gov.uk>, Planning Comments (SMDC) <PlanningComments@staffs-moorlands.gov.uk>
Cc: Steve Massey <Steve.Massey@highpeak.gov.uk>

SMD/2021/0565

Land Adj The Bungalow, High Street, Kingsley, Staffordshire ST10 2AF

Erection of 1 dwelling

0.07 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/ amendments required

Required prior to determination:

1. Biodiversity Impact Assessment using metric 3.1 to show net loss/ gain

Secure via condition should approval be granted:

2. Detailed landscaping to include native habitat creation where possible
3. Amended drainage plans to incorporate more SuDs features and water storage
4. Details of excavations/ spoil use and disposal
5. Species protection and enhancement measures

HABITATS and SPECIES

The Preliminary Ecological Appraisal by Charnia Ecology dated March 2022 found no significant protected or priority species issues on the site, other than the potential for birds to be nesting in trees/ scrub/ hedgerow on site, some of which are proposed for removal.

Poor diversity semi-improved grassland is the main habitat as well as bare ground and sandy cliffs created by recent site excavations.

Features such as logpiles, bare earth microcliffs, mammal access holes in fences and nesting/ roosting boxes, plus good landscaping with additional planting of berry-bearing shrubs/ trees would encourage a number of priority species recorded nearby including bats, hedgehog, house sparrow, song thrush, dunnock and solitary mining bees.

Recommendations in the report covering species protection and enhancements should be secured via condition if permission is granted.

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 will result in a net loss of habitat compared with the undeveloped site conditions. Landscaping could mitigate this to an extent, but given the space taken by hardstanding and

development in the proposals, is not clear whether a net gain would be delivered within the site.

A Biodiversity Impact Assessment using Defra 3.1 metric or the latest 'small sites' metric is required. This should take the baseline as the site conditions before any unpermitted work was carried out. Should a deficit in biodiversity units be found, this would need to be offset directly by enhancing land elsewhere, or via a financial contribution to the council which could potentially be used on a local greenspace. This could be secured via condition or a Section 106 agreement.

Ideally, the site itself would be designed to retain and gain at least 1% measurable biodiversity units. Maximum value could be achieved on the site by incorporating some higher-value habitats:

Species-rich native hedgerows on boundaries, orchard or woodland planting, diverse flowering lawn for grassed areas and wet meadow/ Suds feature could potentially replace some biodiversity value, but would need to be maintained for at least 30 years.

Drainage

To minimise surface water run-off we advocate use of sustainable drainage systems to store, dissipate and infiltrate rainwater. Rainwater harvesting for domestic use could be a good option here. Otherwise, rainwater butts would help store and re-use some water. Use of porous surfaces such as reinforced grass for parking spaces and porous paving would help store and infiltrate more water rather than relying on soakaways alone. Directing some run-off into dipped landscaped areas that act as 'rain gardens' e.g. the area adjacent the parking spaces would be a valuable feature.

The existing shared driveway is impermeable and does not seem to have any drainage infrastructure, which will be causing excess water to run off the site. Sediment/ gravel from the site appears to have been washed down to the road when viewed on Google streetview. Consideration should be given to upgrading the driveway and adding porous areas/ drainage connections and potentially a swale using the existing grassed verge alongside.

Ground works, level changes, soil

It is not clear whether spoil generated from level changes on the site will be taken off-site or re-used elsewhere. If re-used, this may impact on another area potentially outside of the red line boundary , so details would need to be considered.

SUSTAINABLE DESIGN

The orientation of the proposed roof is ideal for incorporating solar panels, but the roof slope and design is not. Given the need to diversify energy sources this should be a key consideration for any new dwellings, alongside meeting visual character requirements.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer

07494852383

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