
From: Planning For Nature
Sent: 14 October 2022 15:21
To: Johnston, Christopher; Planning Comments (SMDC)
Cc: SCC Flood Team; paul@evolutionecology.co.uk
Subject: SMD/2022/0350 Vulcan Refractories Ltd

Categories:

SMD/2022/0350

Vulcan Refractories Ltd, Draycott Cross Road, Brook Houses, Cheadle, Staffordshire, ST10 1PN
New industrial unit and associated works.

0.7 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 – Objection -further information/ amendments required

Required prior to determination:

1. Amend layout to avoid floodplain and encroachment into the river corridor, and provision of replacement pond feature
2. Biodiversity metric to demonstrate how net gain can be achieved
3. Sustainable drainage scheme

Secure via condition should approval be granted:

4. Lighting plan
5. Detailed landscaping plan
6. Species protection and enhancement measures as recommended in the ecology reports submitted

Documents reviewed:

- Preliminary Ecological Appraisal (PEA) Report – May 2022 by Evolution Ecology
- Bat and Bird Presence/ Absence Survey Report June 2022 by Evolution Ecology
- Great Crested Newt eDNA Report - 2022 - Version Two by Evolution Ecology
- 01168 - PL(0)02 Site Plan as Proposed

NATURE RECOVERY NETWORK

Habitat Priorities

The site is within a wetland and woodland Habitat Connectivity Opportunity Area on the Nature Recovery Network map for the district. These are the habitats which are a priority to create/ enhance in this area.

The site overlaps with an ecological corridor along the River Tean. As well as being an important local corridor for species such as bats and water vole, the watercourse needs to be buffered from pollution and water run-off.

Staffordshire Moorlands Local Plan Green Infrastructure Strategy, May 2018

Regarding 'blue infrastructure, policy states:

'5.36 Where possible, opportunities will be sought to undertake river restoration and enhance natural river corridors as part of a new development in line with the Humber River Basin Management Plan (Water Framework Directive). All development should be set back from all rivers and streams with an undeveloped buffer corridor in order to provide biodiversity migration routes, make space for water and provide additional capacity in view of climate change demands. New developments should be designed to view watercourses as aesthetically valuable greenspaces which add value to the development by providing attractive areas for people to view nature. '

The site is also within a recognised ecological corridor '9b River Tean Spur', as shown on page 82. The strategy is intended to enhance and protect green infrastructure assets as well as guide development requirements.

The relevant priorities and actions within this corridor include:

- Extend and improve green infrastructure within the corridor to help support the delivery of a functional mosaic of woodland, grassland, riparian and other habitats that offer a safe haven for wildlife, support biodiversity and help to absorb and store carbon.
- Investigate opportunities to reduce habitat fragmentation and increase connectivity by linking, buffering and expanding existing sites of ecological value, helping to create and improve wildlife corridors extending into the surrounding countryside.
- Promote the establishment of a wider vegetation corridor along the watercourse.
- Investigate potential for new floodplain woodland to manage flood water and provide wildlife habitat including for willow tit.
- Investigate opportunities for utilising natural ways to reduce flood risk, provide temporary storage and improve water quality, while creating wetland habitats for wildlife.

The proposal does not appear to contribute to the aims of the green infrastructure strategy and would impact negatively on the river corridor.

HABITATS

Specific habitat impacts/ opportunities

The site supports semi-natural woodland and a small pond, and is adjacent to the River Tean. The wooded corridor would appear to be long-standing as there is some diversity to the ground flora including Wild Garlic, Wood Forget-me-not, Meadowsweet and Raspberry. It is not clear how much habitat would be retained or replaced but there would appear to be a net loss of vegetation resulting from the proposals and a narrowing of the river bank / habitat corridor.

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, therefore a Biodiversity Impact Assessment using the latest Defra metric is required. Habitats in this half of the site should be assessed as 'Within area formally identified in local strategy' due to being within a green infrastructure corridor.

Drainage

The site is partly within Flood zone 2. The area around the existing building is also prone to surface water flooding. We object to any inappropriate development in the floodplain and any encroachment into river corridors. A minimum 8m no development buffer should be maintained along watercourses. It is not clear that this would be maintained.

No surface water drainage scheme has been provided. A well-designed, easily managed and resilient SuDS scheme is likely to influence layout and landscaping design, so needs to be incorporated into the design at this stage. We advocate an integrated approach that maintains existing site hydrology, makes the best use of water in the landscape and maximises biodiversity value.

Surface water balancing features need to be outside of the floodplain to be effective. It is not clear whether this would be possible on the site. Rainwater harvesting could be an option

SPECIES

The recommended actions within the ecology reports should be secured via condition should permission be granted.

Bats

The Bat and Bird Presence/Absence Survey Report found no bat evidence in the building or the one mature Crack Willow tree with bat potential. However several species of bats were recorded foraging along the river including Daubenton's bats which are particularly light sensitive. The recommendations for lighting and bat box provision should be secured via condition.

Water vole

Evidence of water vole use of the river was found in the PEA survey, on the opposite bank to the proposed development. Precautions will be required.

Great Crested Newt

No evidence of great crested newts was recorded within the waterbody at the site. However, smooth newts were identified within the pond. Recommendations are made for protecting amphibians and reptiles and for a replacement pond to be created, this is not shown in the proposed plan, however.

SUSTAINABLE DESIGN

The orientation of the roof should be a consideration and solar panels recommended.

A good standard of insulation, sustainable materials, energy and water efficient fittings should be required.

Regards,

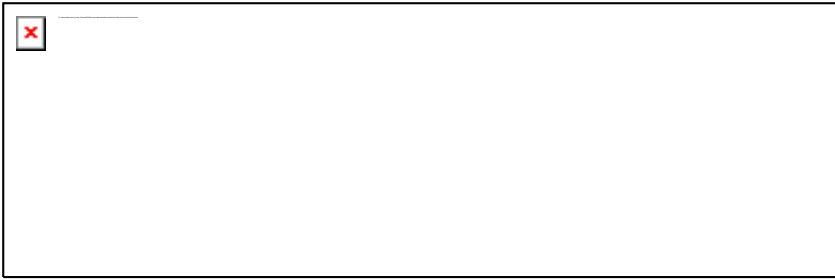
Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



Please note, ecology advice is provided to SMDC 2 days per week- working days are normally Tuesdays and Thursdays.

Planning consultations- please send to



Are you a member of the Wildlife Trust? Less than 10p per day will help us protect and enhance the wildlife and wild places of Staffordshire. [Please join today!](#)

Staffordshire Wildlife Trust Registered Office: The Wolseley Centre, Wolseley Bridge, Stafford, ST17 0WT. Registered as a company in England & Wales number 959609. This email and any attachments are confidential, copyright Staffordshire Wildlife Trust (SWT), and intended for the recipient only. SWT accepts no responsibility for information unrelated to its business.