

From: [Planning For Nature](#)
To: [Ben Hurst](#); [Planning Comments \(SMDC\)](#)
Cc: [Sammons Ltd Planning](#); [connor](#); [Absolute Eco 2](#)
Subject: SMD/2021/0155 Land To Rear Of Rosedale
Date: 15 December 2022 08:01:26

SMD/2021/0155

Land To Rear Of Rosedale 403, Cheadle Road, Cheddleton ST13 7BH

Demolition of existing attached garage and erection of 4 detached dwellings

0.31 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 required

Required prior to determination:

1. Amended BNG metric and appropriate maps
2. Soakaways to avoid tree RPAs
3. Clarification regarding sycamore tree with bat potential.
4. Clarification regarding great crested newt licence requirements

Secure via condition should approval be granted:

5. Bat and bird protection and enhancement measures as specified in Bat Activity Report
6. Artificial Lighting Plan for Bats
7. Amphibian friendly road and drainage design

Documents reviewed:

- Preliminary Ecological Appraisal, August 2020, Absolute Ecology
- Biodiversity Net Gain Report (August 2022) Elite Ecology
- Biodiversity Metric 3.1 Calculation (August 2022) Elite Ecology
- Bat Activity Report (July 2022) Elite Ecology
- GCN eDNA Report (May 2022) Elite Ecology
- Reptile Survey Report (June 2022) Elite Ecology
- 2020-2541-10 PLANNING PROPOSAL - DRAINAGE PLAN November 2022
- 2020-2541-02A PLANNING PROPOSAL - SITE PLAN 14/02/2021

NATURE RECOVERY NETWORK

The site is in the 'Pastures' Habitat Connectivity Opportunity Area. Priorities here are species-rich grassland, hedgerows, woodlands and mature/veteran trees. Locally, parkland is also present. The site contains hedgerows and these are the main local habitat corridor in the immediate area as well as wet grassland areas and ponds.

The proposed habitat enhancements fit well with local priorities.

DESIGNATED WILDLIFE SITES

None impacted.

HABITATS

Habitat Survey

The Preliminary Ecological Appraisal (PEA) conducted by Absolute Ecology dated August 2020 found the habitats on site to comprise mainly semi-improved grassland and amenity grassland, with the eastern hedge of note as a priority habitat to be retained. Grassland areas will be lost, the eastern hedgerow will be retained and trimmed with additional native hedges planted.

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 submission includes a Biodiversity Net Gain Report (August 2022) and Biodiversity Metric 3.1 Calculation (24 August 2022) which show that without mitigation, the development site would result in a net loss of habitat units, but a net gain in hedgerow units. Habitat creation to offset this impact is proposed on adjacent land owned by the applicant, assumed to be in the field lined in blue on the location plan, which appears to provide an overall net gain. However there are issues with the information that need to be clarified.

The list of Phase 1 habitat types found in the PEA is not reproduced correctly in the Biodiversity Net Gain report- Amenity grassland has been replaced by Tall ruderal.

I can find no baseline habitat map or survey of the proposed habitat offset field, as it was not included in the original PEA. There is also no map showing its location relative to the proposal site. It is categorised in the BNG Report as modified grassland, but was not surveyed by Elite Ecology and there is no survey evidence to support this. The field looks from aerial photos to be similar to the semi-improved grassland in the proposal site paddock, in which case it should have a higher baseline value. Location map, baseline habitat map and survey evidence is required.

The habitat maps provided are all different types and do not show the areas of habitat as categorised in the metric, i.e. UK Habs categories. It is therefore difficult to see how the habitats have been accounted for.

The area of required GCN habitat has been accounted for as 'developed sealed land' as it cannot be included as a net gain due to the legal requirement for GCN mitigation. This means it will result in a habitat loss in the metric which is not accurate. The GCN area should simply be excluded from the proposed BNG habitats completely, with just the remaining field area included. This needs to be amended.

The percentage gains for habitat look to be inaccurate, as the total net unit change from all on and

off-site areas is 0.40 units, and the total baseline units for the same areas is 4.84, so the gain should be 8.26% not 27.18%.

An amended metric and maps are required.

Drainage

The submitted drainage plan is suitable, proposing soakaways for surface water and foul drainage connections to the mains sewer. However it appears that a number of soakaways impinge on tree root protection areas and will need to be moved. There may be potential for soakaways under driveways and roads. Or, water could be discharged into a new ditch/ swale in the adjacent habitat mitigation field which may be easier and would create a new habitat feature.

Due to the presence of GCN locally, amphibian friendly road and drainage design are essential to include. This ideally means avoiding roadside curbs, gully pots and other structures that can trap amphibians in favour of open drainage features such as swales and accessible landscaping.

SPECIES

Bats

The PEA found that a double stemmed sycamore tree (TN2) on the eastern boundary of the garden area within a mature has moderate bat roosting potential and requires surveys if removal or limb work is required. TN2 is not marked on the habitat plan. Seven trees are marked for removal on the proposed drainage plan, and the mature hedge proposed to be trimmed. It is not clear whether the sycamore is the tree to be felled or may be trimmed within the hedge. The tree either needs to be retained and works avoided, or a bat survey undertaken. It would be helpful if the Tree Report by Tree Heritage mentioned on the drainage plan could be submitted.

The Bat Activity Survey Results report (July 2022) by Elite Ecology found that the garage to be demolished did not support bats, but the house adjacent contains a day roost of common pipistrelle (*Pipistrellus pipistrellus*) bats. Due to this, no works on the surveyed structure should commence before October 1st and should not continue after April. Once the works commence, a licenced ecologist is required to undertake soft demolition by accompanying building contractors in inspecting the structure by hand. The provision of integrated bat boxes within the new garage is recommended.

The Biodiversity Net Gain plans also include further bat and bird boxes within the new houses.

Suggested condition:

The proposed development is to proceed in accordance with the recommendations made by section 5.1 of the submitted Bat Activity Report (July 2022) by Elite Ecology. Agreed features for roosting bats shall be permanently installed in accordance with the approved details.

Reason: To safeguard protected species in accordance with the NPPF.

An Artificial Lighting Plan for Bats to be submitted and approved prior to occupation of the development should also be secured as a condition.

Great Crested Newts (GCN), Other Amphibians

The Great Crested Newt Environmental DNA (eDNA) Survey Report (May 2022) by Elite Ecology found GCN to be present in a pond around 95m from the site. Common frogs (*Rana temporaria*) were also found on site during the reptile surveys.

The proposal site contains suitable habitat for GCN, so potential impacts to GCN habitat are predicted. The report states that 'impacts from the proposed works are likely high' but recommends only reasonable avoidance measures. There is no risk assessment to confirm whether a licence is required - clarification is needed. An alternative may be to use the district level licencing system in place in the district.

Birds

A blackbird was observed carrying nesting material into the introduced shrub along the eastern wall of the garage. Vegetation clearance will need to avoid the bird nesting season or the area checked before clearance. Recommendations within section 5.2 of the Bat Activity Survey Results report to be secured via condition.

Badgers

No badger setts were recorded in any of the visible areas during the time of the survey. Occasional mammal paths were noted, indicating badgers use the site for foraging/commuting/territorial marking only. Retaining badger access should be achieved as the post and rail fencing and hedging will allow mammal access.

Hedgehogs

Hedgehogs are a priority species and have been recorded nearby in 2016 and reported by local residents. Permeable fencing design / hedgehog highway access holes required in new boundary treatments- secure via condition.

SUSTAINABLE DESIGN

The orientation of dwelling roofs should be a consideration for the final design, in terms of maximising potential for solar gain and solar panels – not all homes have roofs suitable for solar installation currently. This should be amended in line with current policy for sustainable homes/ renewable generation.

Regards,

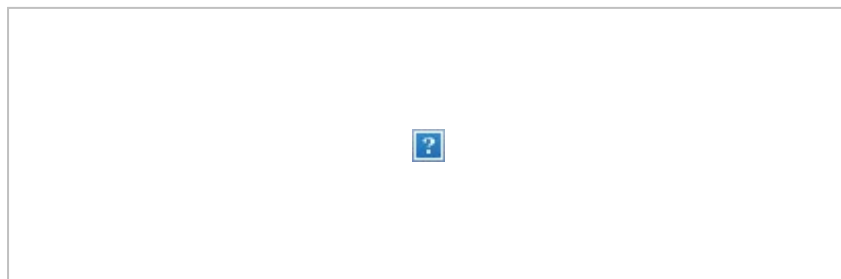
Kate Dewey BSc (Hons) MCIEEM

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 planning@staffs-wildlife.org.uk



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