
From: Planning For Nature
Sent: 24 January 2023 13:17
To: Simon Lawson; Planning Comments (SMDC)
Subject: SMD/2022/0088 FIE, Bones Lane

Categories:

SMD/2022/0088

FIE, Bones Lane, Cheddleton, Staffordshire, ST13 7BT

Food processing facility/edible bone factory

2.9 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 – Further information required.

Before determination:

1. Consult Natural England regarding potential impacts to Churnet Valley SSSI

Secure via condition should approval be granted:

1. Detailed baseline survey and habitat creation plans for off-site planting area
2. Updated BNG metric using metric 3.1, and reflecting design changes.
3. CEMP, to include precautions to be followed as per section 7.1 of the Preliminary Ecological Appraisal report, including suitable precautions for nesting birds for clearance works and bats, and pre-commencement update walkover survey to ensure ecology conditions have not changed.
4. Lighting plan
5. Soil handling plan

Documents reviewed:

- Preliminary Ecological Appraisal Report (Sterna Ecology, January 2022)
- Landscape and Ecological Management Plan (Sightline Landscape, ref: 478 AP Cheddleton LEMP Rev D 17.08.22)
- Application Form
- Planting Plan (478_PP_01 Rev B, 17.08.22)
- Off Site Planting Plan 478_PP_02_Rev B 17.08.22
- Existing Site Layout
- FRA (26th January 2022)
- Biodiversity Metric 3.0 FIE Cheddleton R2 - 0.6ha off-site woodland

NATURE RECOVERY NETWORK

The site is located within the woodland Habitat Connectivity Opportunity area, with part of the site also in the Wetland HCO. The proposed habitat creation of woodland, meadows and ponds is suitable for the area.

The site is in a strategic area for biodiversity enhancement, as there is a high proportion of semi-natural habitats in the locality and the site is adjacent existing woodland blocks.

DESIGNATED WILDLIFE SITES

Statutory Designated Sites

The site is upstream of Churnet Valley SSSI, but lies within the SSSI Impact Risk Zone for the Churnet Valley, as shown on MAGiC map <https://magic.defra.gov.uk/MagicMap.aspx>. The proposal appears to meet the following categories/ descriptions which would require consultation with Natural England:

Air Pollution - Any industrial/agricultural development that could cause AIR POLLUTION (incl: industrial processes, livestock & poultry units with floorspace > 500m², slurry lagoons & digestate stores > 200m², manure stores > 250t).

Water supply - Large infrastructure such as warehousing / industry where total net additional gross internal floorspace following development is 1,000m² or more

Discharges- Any discharge of water or liquid waste of more than 5m³/day to ground (i.e. to seep away) or to surface water, such as a beck or stream.

Possibly also:

Composting- Any composting proposal with more than 75000 tonnes maximum annual operational throughput. Incl: open windrow composting, in-vessel composting, anaerobic digestion, other waste management.

The Preliminary Ecological Appraisal (PEA) report notes that there is 'a risk that a major pollution incident, or fire, at the Proposed Development Site could have a significant impact on the Churnet Valley SSSI. Such an incident is most likely to occur through a pollution incident affecting water courses in the vicinity of the Proposed Development Site, such as the stream that runs through Felthouse and Consall Woods. Any such pollution could make its way south into the Felthouse/Consall Woods stream, which then flows directly into the Caldon Canal/River Churnet upstream of where it flows through the Churnet Valley SSSI.'

However, the report considers that the risk of this occurring is negligible, given the water control measures proposed.

Consultation with Natural England is required.

Local Wildlife Sites

The proposal is upstream of a locally designated site, Felthouse Wood Biodiversity Alert Site, 452m directly east, part of which is also an ancient woodland. This site could potentially be impacted should spillages occur. It is not known whether any changes in air pollution from the plant could impact the ancient woodland. It is likely that will appropriate control measures, and effects would be negligible.

No other Local Wildlife Sites would be likely to be impacted.

HABITATS

Trees and hedgerow retention

We advise that the recommendations set out in the Arboricultural Impact Assessment (LTM0385.AIA.01) are followed to protect retained trees and hedgerows, unless the Arboricultural Officer (or other relevant consultee) has any additional comments/objections.

Biodiversity Net Gain (BNG)

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'.

A biodiversity net gain assessment using metric 3.0 has been provided, showing that within the proposal site, a large gain for hedgerows is expected, but a net loss of nearly one biodiversity unit for habitat area. However, an area of new native woodland and meadow planting has been proposed offsite to the south, within the same landholding. The overall net effect would be gains of around 114% for hedges and 47% for habitat area.

To enable accurate monitoring, the metric will need to be updated to use metric 3.1, and to reflect final design changes and the location of the site in a strategic area for biodiversity enhancement. However it is

clear that a comfortable net gain can be achieved on the land specified. A final metric can be secured via condition.

Landscape and Ecological Management Plan (LEMP)

The LEMP includes a landscape and habitat plan, and a 25-year management and monitoring plan. Species enhancements and habitats are included. The plan is suitable.

Levels and Soil Handling

We recommend using subsoil for any wildflower habitat creation areas, and also ponds, to reduce nutrients and encourage good floral diversity.

Woodland planting areas could be prepared with topsoil overlaid with 40cm subsoil, to allow wildflower seeding on the surface but also good tree growth of deeper rooted species.

Drainage

A Flood Risk Assessment (FRA) with proposed drainage has been submitted. Section 4.5 of the FRA states:

“As infiltration is not viable, it is proposed to attenuate runoff using a combination of rainwater harvesting from the main building, green roof on the office building, filter drains and a basin prior to discharging runoff to an existing ditch that ultimately drains to a watercourse (Consall Brook) to the south of the site. The proposed outfall is located within the ownership of the applicant and, therefore, no third-party landowner consents would be required.”

We welcome the inclusion of a green roof – for maximum biodiversity value this should include a variety of substrate depths and plant species if possible- detailed design could be secured via condition.

The drainage details appear to show adequately that run-off from the site will be controlled.

SPECIES

The PEA report has not recommended any further species surveys, however, precautions are recommended within section 7.1 during site clearance and construction.

Bats

The site has been adequately assessed for bats. Important features will be retained. The proposed habitat enhancements are likely to improve foraging habitat and the bat boxes will provide additional roosting opportunities.

However, as also stated within the PEA report, there are potential impacts from lighting. We therefore recommend that a wildlife friendly lighting plan is secured via condition. This is to protect bats that may use the proposed bat boxes for roosting but also to maximise the value of the commuting and foraging corridors. This will also benefit other species, including invertebrates.

Great Crested Newts (GCN), Amphibians

The site has been adequately assessed for GCN. No impacts are anticipated.

Otter and Water Vole

The site has been adequately assessed for otters and water voles. No impacts are anticipated.

Birds

An ornithological walkover survey has been completed. We are happy that this has assessed the potential impacts of the development.

Precautions during the preliminary site preparation and construction will be required to protect nesting birds. We recommend that the precautions set out in section 7.1 of the PEA report are followed in full.

Reptiles

The site has been adequately assessed for reptiles. No impacts are anticipated.

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.