
From: Planning For Nature
Sent: 19 July 2023 18:18
To: Bob Philips; Planning Comments (SMDC)
Cc: Steve Massey;
Subject: SMD/2022/0199 Land Adjacent To Daisy Bank Farm

Categories:

SMD/2022/0199

Land Adjacent To Daisy Bank Farm, Uttoxeter Road, Upper Tean, ST10 4LJ

Reserved matters application and associated discharge of conditions 3, 11, and 13 pursuant to outline planning permission ref, SMD/2018/0509 for the residential development of 55 dwellings

2.61 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 - amendments required

Required prior to determination:

1. Revised landscaping to increase biodiversity net gain, and access details for wildlife area maintenance
2. Updated EMP and biodiversity metric reflecting improvements
3. Amended drainage plan to include wetlands/ swales

NATURE RECOVERY NETWORK

The site is in the Pastures and also Wetlands Habitat Connectivity Opportunity Area. Wetland features, meadows, hedgerows and parkland trees are all key habitats for creation/ restoration.

Local priority habitats and wildlife corridors include hedgerows, ponds, the River Tean, watercourses, floodplain meadows, small semi-natural woodlands and traditional orchards.

The site is within a strategic ecological corridor (9. Cecilly Brook Corridor) and also a water management corridor in the Staffordshire Moorlands Green Infrastructure Strategy May 2018.

DESIGNATED WILDLIFE SITES

No designated sites are nearby or likely to be impacted.

HABITATS

Habitat Survey

The site supports mainly poor value grassland, some tall ruderal vegetation, intact and defunct native hedges and a significant number of trees.

Some sections of hedgerow will be lost, as well as the majority of the grassland, and over half the trees.

Proposed habitats include shrub and tree planting in a wildlife corridor around the site, plus wildflower and amenity grassland within open spaces. Garden planting also contributes some value.

Biodiversity Net Gain

Policy NE1 paragraph 5 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'

Given that the site is in a strategic green corridor and is a large scale major application, a net gain of 10% would be reasonable to expect here.

The submitted Biodiversity Impact Assessment, January 2023 by Rachel Hacking Ecology uses Defra metric 3.1 and indicates there would be a net gain of 13% for hedgerow units, and 3.72% for habitat area units. However, there look to be opportunities for additional gains.

Hedgerows-

All native hedges should be species rich with standard trees at 20m spacing. Retained hedges should also be enhanced, with additional species and standard trees, so that all hedges on site meet the habitat type 'species-rich hedgerow with trees'.

Could a hedge be provided along the north of Plot 1, to link planted areas?

Grassland areas-

All amenity grass outside of gardens should be enhanced with short flowered lawn mix such as Naturescape **N14 Flowering Lawn Mixture**, and planted with naturalised bulbs such as crocus, snowdrop, bluebell and native daffodils- the current bulb planting specification should be amended and added to further areas. This will allow the grass to be mown less often (as encouraged by the EMP) and achieve better diversity and a greater value. The edge of these areas may be mown regularly for a neat appearance.

Amenity grass adjacent to the wildlife corridor (adjacent Plots 11, 12, 22 and 23) should be replaced with wildflower meadow sowing

Proposed wildflower meadow areas should be accounted for as Other Neutral Grassland achieving Good condition. A more diverse seed mix should be used or locally harvested seed/ green hay used to supplement.

The planted buffer along north, east and south needs to have management access, to enable maintenance and avoid possible issues with fly-tipping or garden extensions.

Trees/shrubs-

If some planting could be swapped for heritage fruit trees (of local source if possible), a small traditional orchard could be created which would fit in with local priority habitats and aims for the district.

Wetlands-

The proposed cellular storage areas within open spaces should as far as possible be replaced with surface water features such as swales/ retention basins, as this would contribute to wetland priorities for the area, and increase biodiversity value.

Ecological Management Plan

Condition 13 of the outline permission requires a plan to be submitted with reserved matters details.

13. The first reserved matters application shall be accompanied by an Ecological Management Plan (EMP) which shall first have been submitted to and approved in writing by the Local Planning Authority. The EMP shall address mitigation and enhancement and should include the following although this list should not be regarded as exhaustive:

- a) Purpose and conservation objectives of the proposed enhancements.*
- b) Detailed designs and/or working methods to achieve stated objectives.*
- c) Extent and location of proposed works on appropriate plans and scale maps.*
- d) Type and source of material used where appropriate e.g. native species of local provenance.*
- e) Creation and enhancements of semi natural habitats linked to Staffordshire and UK biodiversity Action Plan priorities prioritising the enhancement and creation of hedgerows and associated buffer strip (up to 2m from hedgerows).*
- f) Provision for linear wildlife corridors and stepping stone habitats linked into the surrounding landscape and Local Wildlife Site (LWS) promoting habitat*

connectivity.

g) *Timetable for the implementation of works demonstrating that works are aligned with the proposed phases of the development. This should include a ten year plan detailing implementation, monitoring and remediation and habitat maintenance measures*

h) *Creation of bird nesting features for bats, house martin and house sparrow within new buildings.*

i) *Creation of grassland areas to include soil preparation, seeding or creation using green hay, initial and long term maintenance including cutting regimes and protection from disturbance.*

j) *A lighting design plan and technical specifications to minimise light spill into surrounding hedgerows and the adjacent countryside. Lighting must demonstrate acceptable impacts on foraging or commuting bats that may use adjacent hedgerows and allow birds species to exhibit undisturbed behaviour patterns.*

k) *Garden planting to benefit pollinating insects including climbing species to create green infrastructure*

l) *Persons responsible for implementing the proposed works.*

The EMP shall be implemented in accordance with the approved details and all features shall be retained in that manor thereafter.

Reason: In order to secure a net gain in biodiversity.

The Ecological Management Plan dated 23/05/23 by Rachel Hacking Ecology is generally good but does not meet some of the condition requirements.

a) Objectives set out, but Objective 5 should state amenity and species rich grassland.

b) Yes

c) Yes Landscape proposal Full site 6838C dated 11 April 2023

d) Topsoil is specified for amenity grassland –this is fine for gardens but not for wildflower meadow areas. The larger open space areas should be subsoil where possible with a thin topsoil layer which will favour wildflowers.

e) Yes, although habitat types can be improved

f) Yes Linear wildlife corridors provided

g) Timetable is provided for a 10 year plan – this should ideally be 30 years to secure BNG; the current plan could be extended with monitoring until all habitats have reached target condition.

h) Condition requires boxes to be built into new buildings- Schwegler 1B General Nest Box should be replaced with an in-built type. Bat boxes are proposed on trees- half should be integral bat bricks in houses.

i) Grassland creation does not specify use of green hay/ locally gathered seed. This can be added to the specified seed mix. Long term cutting needs to state removal of arisings. Landscape plans state 'All wildflower areas to have 1M wide close mown grass edge adjacent'- this should be sown with the same mix or short flowered lawn mix and apply to all public greenspaces to allow longer sward through May.

Add naturalised bulbs to all amenity grassland in shared spaces.

j) Yes- Lighting plan suitable

k) Yes- garden planting includes nectar for insects, and climbers.

l) Persons responsible – section include in EMP but not specific bodies- more information may be needed?

In addition, the EMP should specify that all material from hedge and tree felling should remain on site and be reused as logpiles/ dead hedges within the wildlife corridors.

Drainage

The site is within a groundwater source protection zone 3. The Environment Agency may need to be consulted.

The SuDs scheme for surface water appears reasonable, although we note the comments from the local flood authority. The drainage scheme does not maximise wildlife value, and given that several geocellular storage areas are in open spaces, consideration should be given to creating swales (on either side of the access road entrance), and detention wetlands within the landscaping. These could also be shaped more easily to avoid tree RPAs.

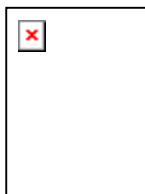
There are many areas of amenity grass within the site, that could serve to infiltrate water if they were to be slightly dipped and able to receive roof or road run off. Swales could also be created at road ends near to the wildlife buffer e.g. adjacent Plots 11, 12, 22 and 23.

Rainwater harvesting for homes is also an option that would reduce outputs to the sewer system. The blocks of four terraces within the layout may be the most suitable.

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



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