

11th November 2015



Dear Mr. Alford,

15/23128/FUL

Variation of conditions 2, 9, 11 and 12 of 14/20194/FUL - reinstatement of boundary hedge

Land At Former Freedom Caravans Lichfield Road Stafford Staffordshire
SJ937216

0.53 hectares

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Staffordshire Wildlife Trust objects to the current proposals shown on the Proposed Landscape Plan V09A26 - W005 Rev D 16Oct15 as these do not adequately replace the removed hedgerow. The proposed new hedge runs only half the length of the eastern boundary and is also specified as hawthorn only, which does not reflect the feature's original diversity. Native intact hedgerows are a Habitat of Principal Importance under the NERC Act 2006 and losses need to be avoided or compensated wherever possible as per guidance in the NPPF and Planning Practice Guidance. Hedgerows are also a target in the Staffordshire Biodiversity Action Plan and Stafford Borough BAP.

The Extended Phase 1 Habitat survey March 2014 by Middlemarch shows the original hedgerow along the whole of the eastern boundary, and describes it as up to 4m tall containing hawthorn, bramble, elder and several semi-mature ash and birch trees. Having viewed the site via Google streetview, where the hedge is still visible, elm shrubs were also clearly present at the roadside end of the hedge. The Nocturnal Emergence And Dawn Re-entry Bat Surveys Middlemarch September 2014 also recommended the planting of night-flowering species such as honeysuckle *Lonicera periclymenum* in the landscaping. We therefore request the hedge be replaced along the whole eastern boundary and consist of the above mentioned species.

The habitat survey also clearly states that the hedgerow was outside of the eastern boundary fencing. Personal communication from the adjacent landowner has also indicated that the hedge was in his ownership. Therefore it would appear that the reinforced bank that has been constructed where the hedge originally stood is potentially beyond the original boundary of the site. Unless an alternative suitable and agreeable solution can be found, this bank should be removed to enable the hedge to be replanted in its original position.

In support of this, a letter from the council dated 12 August 2015 regarding discharge of conditions suggests the applicants submit 'landscaping details to show a Mixed Native Hedge'. Condition 9 of the original application 14/20194/FUL regarding landscaping works also stipulates that 'The details shall be informed by the submitted ecology reports for bats...'

The Extended Phase 1 Habitat Survey recommends:
'Planting of habitats which will be of value to wildlife, such as:

Chairman
Richard Higgs
Chief Executive
Julian Woolford

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Working for a Living Landscape

- native seed/fruit bearing species
- nectar-rich species to attract bees and butterflies
- species which attract night flying insects which will be of value to foraging bats, for example: evening primrose *Oenothera biennis*, goldenrod *Solidago virgaurea*, honeysuckle *Lonicera periclymenum* and fleabane *Pulicaria dysenterica*.
- Provision of nesting/roosting habitat, such as installation of nest boxes for species such as
- house sparrow, dense scrub or native thicket for species such as song thrush, and bat boxes
- for species such as pipistrelle.
- Retention of the boundary habitats (hedgerows and trees) where possible.

The Nocturnal Emergence And Dawn Re-entry Bat Surveys recommend:

'R1 Retain 'Dark' Foraging/Commuting Corridors

The proposals should be designed in a way as to retain the 'dark' foraging and commuting corridors along the southern and south-eastern boundaries, by retaining a buffer of suitable vegetation and maintaining the existing unlit corridor. Where retention of habitat features is not possible, the landscaping scheme for the proposed development should aim to replace lost habitat.'

R2 Native Planting and Bat Boxes

The landscaping scheme for the proposed development should incorporate native and wildlife friendly species where possible, preferably along southern and south-eastern boundaries. In addition, the planting of night-flowering species such as such as honeysuckle *Lonicera periclymenum*, would provide habitat for a variety of moths and other invertebrates, which in turn will provide a valuable foraging resource for bat species. Furthermore, the proposed development should take advantage of other opportunities to enhancement the site for bat species, such as through the installation of bat roost boxes on mature trees in unlit areas. A variety of roost units suitable for all species recorded on site is advised.'

Proposed landscaping on the southern boundary, 'Planting schedule Area D' would also not replace the original vegetation which is described in the habitat survey:

'On the outside of the south-eastern section of chain link fencing was a mature hawthorn hedgerow to 4 m in height with two mature birch trees.'

The current proposed planting is also very 'urban' in nature and not appropriate for the boundaries that face onto the open countryside adjacent. We request the southern boundary is planted with a similar replacement hedge and trees as were present before, and any other planting in area D be composed of native and wildlife friendly species as recommended in the ecology reports.

As the new hedging will take several years to establish, some form of temporary barrier to provide shelter and light protection and give bats a commuting corridor should be put in place. We suggest some kind of solid or semi-solid fencing, over which climbers such as honeysuckle, wild rose, ivy and wild clematis could be grown fairly rapidly, giving screening effect while the hedge grows up. This could be retained or removed once the hedgerow is functional and/ or reaches original height of 4 metres..

As the hedge was a bird nesting feature and a number of birds were recorded on the site including priority species House sparrow, Dunnock and Starling, plus blue-tit, nest boxes for these species should be installed to replace lost habitat and encourage bird diversity on the site. These could be placed on the buildings, boundary fence or trees as appropriate for the species/ box type.

As the eastern and southern hedges have been removed without permission and replacement planting and features will not be exactly the same as the original

vegetation and take time to establish, we recommend a repeat bat activity survey at the same time of year (September) 2 years post completion is made a condition of this permission, to check that bats have returned and are continuing to use the site in a similar way to the baseline survey. If they are not, remedial measures to be advised by the ecologist and actioned.

SUMMARY

Staffordshire Wildlife Trust submits a holding objection to the proposals as they do not adequately replace the eastern and southern hedgerows, or follow the original permission conditions or recommendations in the submitted ecology reports. We advise the following are sought:

Before determination-

- A. Eastern boundary hedgerow to be replaced along the whole boundary, removing constructed bank if necessary. Species mix to replicate original species composition as stated above plus appropriate species recommended in ecology reports, to be agreed in conjunction with SBC Biodiversity Officer and Tree Officer.
- B. Southern boundary hedge to be replaced as per original hedge, with the rest of Planting schedule Area D planted with suitable native/ wildlife beneficial species.
- C. Temporary fencing with climbing vegetation to be provided along eastern and southern boundaries adjacent open countryside as a temporary bat corridor, to be removed or retained once new hedges reach former height i.e. 4m.
- D. Bird boxes specified as per target species and in appropriate locations.

Secured through conditions should permission be given –

- E. Repeat bat activity survey at same time of year 2 years post completion, with advice and remedial actions as necessary to achieve similar activity to that found in baseline surveys (Nocturnal Emergence And Dawn Re-entry Bat Surveys September 2014 by Middlemarch Environmental)

Staffordshire Wildlife Trust would like to be kept informed of progress with this application, and receive details of the final permission/ refusal. The Trust would be pleased to assist in formulating any conditions or biodiversity advice on site. Please contact me if you have any queries regarding this response.

Regards,

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