

Via email

1 December 2016



Dear Mark Alford,

**Application No:** 16/24862/OUT  
**Development:** Mixed use comprising public house, hotel, day nursery, community (assembly/meeting) room, nursing home, professional consulting premises, offices and light industrial/storage/trade counter units; associated works (outline but with access details)  
**Location:** Land South Of Creswell Grove Adjoining M6 Creswell Grove Creswell Stafford  
**Grid reference:** SJ901255  
**Area of site:** 7.2 hectares

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Thank you for consulting Staffordshire Wildlife Trust (SWT) on the above application, received on 07/11/2016. We have viewed the following documents:

- Ecological Appraisal Rev F dated June 2016 by FPCR
- Flood Risk Assessment dated September 2016 by BWB
- Parameters Plan 2 – Landscape Framework
- Lead Local Flood Authority Planning Application response Staffordshire County Council 27/10/2016

### Green Infrastructure

The scheme should comply and contribute to objectives in A Green Infrastructure Strategy for Stafford, The Strategic Plan November 2009. This site is within the 'Wetland Management Expansion' zone. The meadow and SuDs creation proposals could contribute to the strategy, if they balance the overall impacts of the development.

### Biodiversity Gain

The Ecological Appraisal report assesses most aspects well, but does not highlight the need to aim for net biodiversity gain, as specified in the NPPF. In order to achieve this on the site, losses of all semi-natural habitats must be fully mitigated

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and opportunities taken to enhance retained areas, and also the built elements, for wildlife. As around 50% of the land will be developed, the remaining green areas need to be of a high quality to be able to function as wildlife habitat and support a similar or greater diversity of species.

## **Data search**

In the Ecological Appraisal, no date is given in the methods for the data search, however the Designated sites and Protected Species plan (Figure 1) is dated November 2011. This is out of date - it does not show Seighford Moor Local Wildlife Site, a 42 hectares of species-rich floodplain meadows which is located around 470m south-west of the site and was designated in 2012. There are also other wildlife sites missing from the map such as Stafford Common, whereas others at a similar distance have been shown/ listed. The data search should also be updated in terms of species records, and include priority as well as protected species. A large flock of Lapwing was recorded on the site in February 2014.

## **Hedgerows**

H2 alongside the Cresswell Grove road is proposed to be removed. The hedge is composed principally of elm, which is unusual. White Letter Hairstreak butterfly, a priority species, has been recorded nearby which feeds on elm. The hedge needs to be replaced in order to ensure no net loss of this priority habitat. We recommend that the shrubs from H2 be translocated to a position further back from the road to ensure visibility, and the new hedgerow enhanced with extra species. This will provide a more 'instant' boundary feature that will establish more quickly and maintain the roadside landscape, as well as maintaining the elm shrubs. Alternatively it could be translocated to the western boundary. Newly planted species-rich hedges using locally appropriate species should be established on any boundary without one, and retained hedges enhanced with added species and standard trees. New hedges should be undersown with a suitable hedgerow flower mix.

The adjoining farmland to the south has been in a Higher Level Stewardship scheme for some years now, aimed at re-wetting the fields and encouraging wading birds such as lapwing. The floodplain grazing marsh is priority habitat and could possibly become a Local Wildlife Site in future with continued management. The willow and alder trees along the southern boundary of the site are tall and also in need of management- tall trees discourage wading birds within a certain distance as they act as predator perches. It would benefit the neighbouring areas, the development site and the health of the trees if these could be coppiced/pollarded and thinned, with regular ongoing management every seven years or so.

## **Grassland**

Although this is not highly diverse, it still has some species indicative of semi-natural meadows, and has value as a habitat. If the site is to achieve a net gain in biodiversity, the loss of around 50% of this grassland needs specific mitigation to increase the diversity and structure of the retained areas. We support the recommended enhancement measures by FPCR, but rather than a seed mix, locally

sourced green hay should be used for meadow creation. This is not only generally cheaper but also more locally appropriate. Seighford Moor LWS, Doxey Marshes or recently created (with green hay) meadow areas at Redhill Business Park are the nearest suitable sources. Derrington Millenium Green LWS is also nearby. Any species of value within the development area could also be marked and transplanted into the proposed meadow areas.

Although no specimens of Bee orchid were found during surveys, this species reacts to disturbance and is likely to still be in the seedbed. Work on the site may well provoke orchids to germinate -they are often seen on post-industrial or cleared sites. Preparation of meadow areas to receive green hay involves close mowing and scarifying/ harrowing – this is likely to stimulate orchids to germinate (as has been seen on other sites) so they may appear naturally. Some occasional disturbance could be included in ongoing management to encourage orchids.

### **Sustainable drainage**

The SuDS feature looks to be potentially partly within the floodplain. SuDS need to be outside the floodplain. We support the comments from the Lead Local Flood Authority in terms of the need for more information to show that SuDS will adequately prevent impacts to Doxey Marshes SSSI. Water quality as well as volume control is important, therefore use of reedbed/ wetland areas as well as a balancing feature would be welcomed. Green roofs and rainwater harvesting should also be included in the scheme- these would provide other environmental and economic benefits (reduced running costs, water saving, visual amenity) especially on large or communal buildings.

A damp area is noted at TN1 on the Phase 1 habitat map (Figure 2). This corresponds to the area of high risk pluvial flooding in the north of the site, shown in the Flood risk Assessment Figure 2.2 'Risk of Flooding from Surface Water Mapping'. We recommend this be retained and used as a SuDS feature, as it is already acting as such to hold rain water, and would help maintain the site's hydrological function. This area is shown as a meadow on the Parameters Plan 2 – Landscape Framework, which is welcomed.

### **Trees**

Historically, looking at old maps, the proposal site used to be a parkland landscape around The Mount, with standard trees in grassland. This would be a good theme for the future landscaping within the built areas. Mature trees T1 and T2 are shown to be retained which is welcomed. New standard trees appropriate to the area should be planted and ideally, species-rich grassland established in all areas (this can be mown closely as desired). There could be opportunities to plant specimens of Black Poplar, a local BAP species which is characteristic of wetlands and damp meadows.

### **Bats**

We support the mitigation actions recommended by FPCR in terms of lighting, and provision of boxes/ roosting features.

## **Birds**

Although the site is less suitable for wetland birds than surrounding land, semi-natural areas adjacent to Doxey Marshes SSSI are important in supporting the populations within the SSSI. A large flock of 300+ lapwing was recorded on the proposal site in February 2014. Kestrel has also been recorded, indicating probable presence of small mammals. There are several barn owl records in the area, and this species may well use the rough grassland for hunting. Due to the size of the site, habitats present and proximity to other good habitat, presence of breeding Species of Principle Importance (SPI) birds is very likely. Willow tits (red listed, UK BAP) breed in willows on the Doxey marshes side of the motorway, so may well do so also in trees on the proposal site. Reedbunting, Meadow pipit and Skylark could also potentially breed.

Due to the substantial loss of habitat proposed and the particular need to cater for birds in this area, a breeding and wintering bird survey should be carried out, to assess impacts and inform provision of mitigation. As there are proposals to provide improved on the site, the survey could be carried out as a condition to then inform a detailed mitigation plan. The proposed meadow areas and SuDS feature could attract other key species that favour wetlands, such as snipe, reed bunting etc. which would be more of a priority in this area. In order to enable wetland birds to use the site for nesting/ feeding however, the flood meadow should include a 'no-go' area, at least a third of the meadow, that walkers and dogs cannot access, but can be viewed and enjoyed. This can be achieved by using a ditch or wetland areas to segregate the site, and positioning footpaths so that visitors can have a good walk without disturbing the whole area. Long term management with access for cutting machinery or ideally grazing will need to be considered.

## **Access and community issues**

An informal footpath under the motorway (not marked on site maps) links the proposal site to open space on the opposite side where a kissing gate and path have been installed, leading to the Doxey Marshes nature reserve entrance. This access should not be blocked by any planting etc. SWT would welcome any improvements here such as signage/ interpretation pointing visitors towards the reserve

## **SUMMARY**

Staffordshire Wildlife Trust submits a **holding objection** at present, due to the need for updated and additional information. However if well designed, the proposals have potential for a net gain for wildlife, and if this could be secured we would review our comments. We request:

Before determination –

1. Updated data search and interpretation of data.
2. Further information to show that SuDS will adequately prevent impacts to Doxey Marshes SSSI.

Secured through conditions should permission be given in future –

1. Breeding and wintering bird survey
2. Update surveys for otter and badger before development commences
3. Recommendations made within the Ecological Appraisal Rev F dated June 2016 by FPCR
4. Detailed landscaping plan, including: hedgerow translocation, planting, and enhancement; meadow and wetland creation using local seed sources; management of the southern boundary trees; and any specific species mitigation that is required or enhancement features.
5. Details of paths and access improvements within and off the site.
6. Detailed drainage plan including sustainable drainage features with adequate water treatment function.
7. Long term management plan for open spaces and natural habitats, including monitoring of habitat establishment and repeat bird surveys 2 years post completion.

Secured on land off-site through a S106 agreement should permission be given –

8. Any further compensation required to achieve net biodiversity gain.

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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**Planning and Conservation Officer**

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