

1 September 2015



Dear Graham Allen,

**Application No:** S.15/06  
**Development:** Land between A34 Foregate Street and Martin Drive, Castlefields, Stafford  
**Location:** Construction of new Stafford Western Access Road to include low viaduct and bridge and landscaping works, and the demolition of existing industrial buildings.  
**Grid reference:** SJ914234  
**Area of site:** 35.6 hectares

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Thank you for consulting Staffordshire Wildlife Trust on the above application, received on 22/6/2015. We have viewed the following documents:

- Environmental Statement June 2015 Arup
- Landscape Specification for Planning
- Construction and working areas SWAR/Planning/19 Rev A 24 July 2015
- SSSI Land Calculation Drawing SWAR/Planning/27 Rev A dated 15 July 2015
- Amphibian and Reptile Survey Report December 2014 by URS

### Environmental Statement- Ecology and Nature Conservation

Baseline data collection methods should specify the date of data searches, as new data is often added at various times. An updated data search should be carried out to inform detailed design at an appropriate time.

Throughout the report until discussion of residual impacts at the end, the Flood Compensation Area (FCA) is described and assessed separately from the main road scheme – this does make it harder to see positive and negative impacts across the project as a whole. The potential gains to be made in habitat quality in the FCA would help balance impacts on some habitats and species elsewhere in the scheme. It would help to summarise all findings together, particularly as certain habitats and species are shared in several areas of the scheme.

Table 5.6 lists Non-statutory sites within 2km of the scheme; this doesn't seem to include the FCA and therefore has omitted Seighford Moor LWS which is around 900m north-west.

The Amphibian and Reptile Survey Report states that 'All of the water bodies identified within a 500m radius from the site boundary were assessed...' however it would appear that several waterbodies within 500m have been missed, such as the balancing pond off

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Working for a Living Landscape

Martin Drive, two ponds around 440m and 490m to the south and south-west of Martin Drive where GCN were recorded in surveys in 2007, plus drains in the vicinity of Doxey Road. Some GCN surveys of drains near to Blackberry Lane were carried out as part of application 14/21366/FUL for the rugby club relocation and no GCN found (although palmate newt and others were), however these did not cover all areas within 500m of the SWAR scheme. Also there is no mention of garden ponds being identified or considered. The nearest known GCN record is around 290m from the scheme at Martin Drive, and was recorded in a garden. Given the known metapopulation in this area to the west, it is more probable that GCN may be present in this part of the scheme. We recommend some further assessment is undertaken.

No Otter survey appears to have been carried out within the FCA- there could be resting sites present and with the proposals now seeking to restore and potentially realign a section of the River Sow, it is important to know whether there are any legally protected otter features in the area that would need consideration and possibly avoidance. It would also be necessary to include otter in pre-commencement checks. Additional mitigation could include a new holt constructed from felled timber. Residual impacts from the whole scheme should provide a beneficial impact to otter in the long-term due to habitat enhancements.

Harvest mouse and water shrew are two species recorded on the SSSI that may be impacted by the scheme and should be considered. They may also be present in the southern part of the site where there is a drain, swamp and tall vegetation. Harvest Mouse is a Species of Principal Importance. We suggest that surveys for these species are conducted in any suitable habitat within the road scheme and FCA, as a condition if not possible within the main application, and that suitable precautions are put in place to avoid harm to any animals present. Given the temporary nature of most impacts, the alternative habitat available and additional habitat to be created we would not expect these mammals to be significantly affected if care is taken during clearance and construction.

Some of the values for receptors in table 5.15 for sites, habitats and species are either not accurate or not consistent with values in the main text. All Local Wildlife Sites should be stated as County value rather than Borough. Biodiversity Alert sites are correctly assessed as Borough value. Aquatic habitats such as the River Sow and ditches have not been assessed against the Staffordshire LWS criteria, mainly due to a lack of an up-to-date criteria for running water, but as these habitats support good plant diversity, are probable UK BAP habitats and support a range of invertebrate, fish and amphibian species, we suggest they should be valued at Borough level rather than Local. Amenity grassland does have some value for wildlife so should be Negligible value rather than None. Small areas of Swamp such as that in the western part of the site can qualify as Biodiversity Alert Sites if adjacent to other habitat of similar value; the area of waste ground to the east has some value for priority invertebrate species as several were recorded in this area in 2010 by Andy Jukes, however this site has never been assessed for LWS status. As swamp is a relatively scarce habitat and a Staffordshire BAP habitat, it should be classed as Local value rather than Site. The main text concludes that the River Sow and SSSI portion of the study area is of local value for Otter, but the table states Site value. Likewise for Breeding birds the text states National importance within the SSSI and Local elsewhere- the table only states Local. Wintering birds are not given a value in the main text, but should have a similar conclusion i.e. National importance within the SSSI. Badger – text states Local, table states Site. Common Toad text = Borough value, table = Local. Other amphibian

species should be Local value. The tables should be amended and also any subsequent effects on concluded impacts.

Otter and bats do not appear to be included in the evaluation of features within the FCA, or in the impact assessment, although it is likely these species would use this habitat, albeit mostly for foraging. Their value and predicted impacts should be included.

Impacts to Ecological Networks and Green Infrastructure have been assessed as moderate adverse in the absence of mitigation, but do not appear as a receptor in later tables and no post-mitigation residual impacts are stated.

Cumulative impacts appear only to have been considered in terms of the project itself, rather than 'identifying other relevant projects in the surrounding area that could or are impacting upon a receptor identified as being affected by the proposed development' as stated in paragraph 5.3.11 of the Assessment Methodology section in the ES. Other impacts such as climate change, pollution, management issues or other factors affecting receptors should also be considered.

Section 14.3 of the ES tackles cumulative impacts, but does not look in detail at ecology. Also the list of committed developments in Table 14.2 does not include any within 1km of the FCA. These include but are not limited to:

13/19001/FUL Land Adjacent To Wootton Drive

14/19900/FUL Land At Ashes Covert Seighford Installation of 2 wind turbines (currently also 15/22245/FUL which seeks to increase height of these turbines)

12/17167/OUT Land South Of Cresswell Grove Adjoining M6 Junction 14, Mixed use development

Drawing SWAR/Planning/27 Rev A dated 15 July 2015 titled SSSI Land Calculation shows that a total of 8382 m<sup>2</sup> of new habitat would be created from destroyed SSSI and the additional car park area, but that a total of 8438 m<sup>2</sup> of destroyed and existing SSSI would be permanently lost. This does not give a net gain in terms of SSSI area. However, we feel that only the areas of destroyed SSSI under the new road should be counted as permanently destroyed, as the remaining area under car park to the east still has the possibility, however unlikely at this time, to be restored at some point. This would better reflect the actual effect of the road scheme.

Although it would appear that there should be a net gain in habitat area and quality from the scheme, it is not clearly shown or quantified. While some figures are given for habitat loss/ gain, the areas of each type of habitat lost, retained and gained across the whole scheme, including the FCA, are not quantified. The predicted value of new habitats should also be included. A table should be provided listing these, as soon as designs are adequately finalised. E.g. swamp is to be lost in the southern part of the route and SUDS areas may compensate for this - however the proposed habitat type and area for SuDS are not yet given in detail.

### **Construction and working areas SWAR/Planning/19 Rev A 24 July 2015**

The most northerly satellite welfare and materials storage area, hatched purple, has recently been revised to change its location to the 'Saint Gobain' site. The hatched area appears to extend almost to the river – this covers a lower, marshy area in the southern quarter of the plot. Any natural habitat areas should be avoided. This storage area is also directly adjacent part of the SSSI and nature reserve. It has not been included in the

Phase 1 habitat survey, although some other species surveys have covered near to this area. As it is bordered by the River Sow and also a small drain, there could be species implications as well as possible disturbance impacts to the SSSI; Otter and Badger signs have previously been recorded in this area along the drain. A walkover of the site, checks for protected species particularly otter resting sites, kingfisher nesting areas and badger usage, and assessment of any potential impacts should be made. The area should be fenced and managed to avoid any sensitive habitats and species.

### **Landscape Specification for Planning**

Subsoil rather than topsoil should be used in any non-amenity grassed areas - this will favour wildflowers in the mixes proposed and could reduce cutting frequency. Tree planting areas would ideally have a layer of topsoil overlaid with subsoil, which could then be sown with hedgerow/ woodland ground flora mix. This would enable good tree growth without competition from grass or the need to spray around tree bases.

The Mixture for Embankments EM7 specified is not locally appropriate; many of the species are found on base-rich grassland, whereas the soils in this area are more neutral or acid. The woodland mix could be used under any tree planted areas but also needs amending with more locally appropriate species and more hedgerow plants. Along with the glyceria swamp and pond planting details. We will make some further recommendations for the final specification.

### **SUMMARY**

Subject to further information as detailed above, Staffordshire Wildlife Trust does not object to the proposals, but advise the following are sought:

Before determination –

- A. Further assessment for GCN to ensure all areas have been covered.
- B. Otter survey of FCA
- C. Appropriate ecology surveys of the most northerly proposed satellite welfare and materials storage area
- D. Corrections/ amendments/ additions regarding valuation tables, cumulative impacts, SSSI land affected
- E. Areas and values of each habitat type to be lost, retained and created.

Secured through conditions should permission be given in future –

- F. Survey and mitigation for Harvest mouse and water shrew
- G. Detailed specifications for soils and planting mixes for habitat creation.
- H. Bird monitoring programme for both the main road site and FCA.
- I. Monitoring of toad/ badger crossing point
- J. Ecological Management Plan to include measures to protect, replace, enhance, manage and monitor important habitats and species. To include method statements to avoid/ reduce impacts to relevant protected and priority species.

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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