

Via email

23 January 2018



Dear Sarah Plant,

Application No: 17/00959/FUL
Development: Erection of 4 No. agricultural buildings for turkey rearing, and associated infrastructure
Location: The Toft Farm Levedale Road Levedale Stafford South Staffordshire ST18 9LH
Grid reference: SJ904179
Area of site: 2.1 hectares

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Staffordshire Wildlife Trust (SWT) would like to comment on this application as we feel there are nature conservation interests. We have viewed the following documents:

- Flood Risk Assessment and Surface Water Management Plan November 2017 by Hydro-Logic Services
- Preliminary Ecological Appraisal May 2017 by Craig Emms MSc MCIEEM and Dr Linda Barnett BSc (Hons), PhD, MCIEEM.
- Great Crested Newt Appraisal & Mitigation Strategy and Enhancement Measures June 2017 by CES Ecology
- Landscape Proposals IPA21272-11C Rev C 23 Nov 17
- Manure Management Plan 2017 by ADAS
- Sections drawing IP/HF/08 June 2017 by Ian Pick Associates
- Soft Landscaping Specification June 2017 by ACD Environmental Ltd

WIDER ECOLOGICAL NETWORK

Staffordshire Biodiversity Action Plan <http://www.sbap.org.uk>

The site is within the 'Central Farmland' Ecosystem Action Plan area, where the primary objective is to: 'reduce fragmentation of existing semi-natural habitats by linking sites through the creation of habitat corridors and networks using Hedgerows, Arable Field Margins and Rivers where possible. Opportunities to create wetland, grassland and woodland habitat mosaics need to be taken in order to diversify the area. Grasslands are particularly

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important, with an emphasis on lowland dry acid grassland, lowland meadow and coastal floodplain grazing marsh.'

The site has good potential for contributing to these aims and habitats, as hedgerows, woodland planting, grassland and wetland creation are proposed. The habitats need to be designed and created in such a way as to reach BAP habitat quality where possible in future, using low-nutrient soil and diverse and locally appropriate species.

Agri-environment Schemes

According to <http://www.magic.gov.uk> the site is not within a scheme, but areas in entry level and higher level stewardship are adjacent to the west and south. The areas liable to surface water flooding within the site link to channels that would affect other land in stewardship to the south-east.

Nitrate Vulnerable Zones

The site is within the River Trent NVZ in terms of surface water. As there is a surface water flood channel within the site, there is a need to carefully design surface water management to prevent any nitrogen pollutants from the site causing issues with surface water.

The Manure Management Plan does not consider areas at risk from surface water flooding -these are not marked on the risk maps. The manure storage sites are also not marked on the maps.

DOCUMENTS

Ecological Surveys

No data search has been made via Staffordshire Ecological Record in the Preliminary Ecological Appraisal (PEA). This is acknowledged within the PEA as a departure from best practice. Although the site may appear to be likely to have minimal impacts, the presence of important species and Local Wildlife Sites is important to note not only to fully assess impacts, but to inform opportunities and appropriate enhancements. There is a Local Wildlife Site directly adjacent to the proposal site, and also a GCN record 490m to the south-west of the site, indicating that GCN could well be more widespread in the area. The PEA also appears to have assessed a slightly different site boundary to that now proposed.

DESIGNATED WILDLIFE SITES

Statutory Wildlife Sites

Ammonia deposition – it is not clear whether the cumulative impacts have been assessed - what is the current level of deposition that the sites are subject to, that the proposals might add to? This may be within the thresholds for concern.

Local Wildlife Sites (LWS)

A Biodiversity Alert Site (BAS), a Local Wildlife site of district importance, 'Little Heath (land north of)' is located adjacent the proposal site to the south. The proposals would not appear to directly impact the BAS, but will take up existing farmland directly adjacent, and increase disturbance, meaning the site is less well connected in the landscape. The proposed landscaping however, could offset this by creating additional connecting habitats, but the design could do more to maximise this. The current planting specifications do not reflect locally native species, and mixtures should be amended to use species similar to that found in the LWS, hedges on site and in local wetlands. Further recommendations on habitat creation are given in the next section.

A distance of at least 10m should be provided between the development and the BAS, and this area sown with a suitable hedgerow wildflower seed mix or green hay. The distance shown on the plans appears to be just over 10m, however there are no details as to how the ground around the building are to be treated.

Potential LWSs

Many areas of potentially high value habitat exist that have not yet been assessed for LWS status, either through lack of funding or access restrictions. If potential high value habitats, identified through survey or other data are to be impacted it is important to establish their status.

The western hedgerow alongside the road ('Hedgerow 3') is particularly species rich and has the potential to meet Staffordshire LWS criteria for hedgerows - it should be assessed against the Guidelines for the Selection of Sites of County Biological Importance in Staffordshire Version 4.03.02 (April 2015) available here http://www.staffs-ecology.org.uk/html2015/index.php?title=Site_Monitoring

It is not clear whether this hedge will be impacted. The PEA states that 'This hedge will not be breached or damaged during the development and will remain in situ.', but shows a different access track arrangement to that shown in the proposed plans, which shows the access road passing through this hedge. The Landscape Proposals drawing IPA21272-11C Rev C dated 23.11.17 also shows some new hedgerow planting in gaps in this hedge- are these existing gaps or ones that will be created during construction?

If any sections are to be removed, we strongly recommend that where possible the shrubs are translocated into the proposed new hedge planting along the access track- forming a more 'instant' feature that will help in landscaping terms as well as ecologically.

HABITATS

The proposed landscaping has the potential to benefit wildlife, and to create habitats that meet UK Biodiversity Action Plan or Local Wildlife Site quality. This would be ideal to link to the existing BAS and hedgerow network here. To maximise the wildlife value of landscaping simply involves some small changes to soils, planting mixes and management.

Soils

Ideally, topsoil should be removed from the areas to be developed and spread on the rest of the arable field to avoid this resource being lost under the development. Subsoil is best for establishment of wildlife habitats as it is low-nutrient and favours the growth of diverse flora rather than thick grass or weeds, and causes less algae in new ponds. For hedges and woodland areas, some topsoil covered with subsoil is the ideal for strong tree growth while avoiding surface weeds.

Woodland planting

Guelder Rose *Viburnum opulus* should be removed from the mix - it is rarely found in Staffordshire. We recommend this is replaced with Gorse *Ulex europaeus*, which is found locally, is suited to the soil and is valuable to many birds particularly linnet. We also recommend that some Ash, and Crab apple could be added, and possibly Birch which will grow quickly giving better screening and can be thinned out later on.

Ideally for tree planting, cover topsoil with a layer of subsoil as this will suppress weeds, retain moisture for trees and allow undersowing with a hedgerow/ woodland flower mix.

Pond Margins

Pendulous sedge *Carex Pendula* is rarely found naturally in Staffordshire, so should not be planted here. We recommend sowing all grassland and pond margin areas with green hay from a wet grassland site- this should suit both dry and damp areas. Local seed sources are generally cheaper than a commercial seed mix, and additionally help conserve the 'donor' meadow. Marginal plants tend to arrive on their own, and some natural regeneration is positive where ponds are concerned. However, if established vegetation is required for SuDS filtering purposes, we recommend gaining vegetation from nearby

ponds (with landowners permission), which will usually benefit the donor pond by opening up overgrown margins.

Levedale Marshes LWS is located 950m to the south-west, and supports species-rich purple moor grass and rush pasture. This should be suited to the local soil type and would be a good choice for a hay source should the landowner be willing. SWT can advise further as we are experienced in delivery of such meadow/ wetland creation.

Grassland

There is no indication on the Landscape Proposals plan whether the surrounds of the new units will be sown with a grass mix or otherwise. We recommend that green hay be used across the site, unless there are areas that require a more hard-wearing vegetation. The landscaping details need to specify this.

Hedgerows

We recommend the following species mix for new hedge planting, which is more in-keeping with local hedges:

25% hawthorn

15% blackthorn

10 % elm species

20 % hazel

10 % holly

10% Field maple

5 % crab apple

5 % dog rose or field rose

Standard trees at 20m intervals- ash, pedunculate oak, field maple.

Ideally, new hedgerows should be planted on a hedge bank, potentially with associated ditch, made from topsoil overlaid with subsoil. This gives more instant height and solidity to the landscaping in visual terms, reflects local character, and also creates a more varied habitat. Hedges should be under sown with a hedgerow flower mix.

Brash from any removed hedge sections can be re-used on site to form a temporary dead-hedge to protect new plantings and provide cover for wildlife while new shrubs establish. Additional standard tree planting within/ alongside retained hedges would also be beneficial.

Long-term management

There are no details provided as to management of the proposed woodland, basin and hedges- a plan should be secured via conditions.

SPECIES

Great crested newt (GCN)

We are concerned that e-DNA is not enough to estimate a population, or to rule out presence in other ponds around the site, as it can produce false negative results. Levedale Road would not be a barrier to the movement of newts, as it is a small, narrow road with no curbs.

SER holds a record of GCN within 500m of the site boundary – this has not been considered as a data search of SER was not made. Not all ponds within 500m of the boundary are shown in the Location plans in the Great Crested Newt Appraisal report, where ponds assessed or discounted are shown. The boundary of the site assessed is different from that shown in the proposed location plan. A section of hedgerow would appear to be proposed for removal for the access road, which was not in the site layout used in the GCN appraisal.

We would recommend that the GCN appraisal be updated with the additional information above, and confirmation given as to whether this would change the conclusions in terms of potential impacts. Should impacts be the same, the proposed mitigation measures would be appropriate and should be conditioned.

Birds

Priority bird species should benefit from the proposed planting. Barn Owls have been recorded recently in the area, and a barn owl nest box would be appropriate to install on an appropriate building or tree, as the site is more than 1km from a major road.

Other species issues

The recommendations given in the PEA should be secured via conditions.

DRAINAGE AND FLOOD MANAGEMENT

The Flood Risk Assessment and Surface Water Management Plan shows the Environment Agency Surface Water Flood Risk Map of the area in Figure 6 of the report. This shows a band of low, medium and high flood risk just to the north of the proposed units, within the proposal site. The proposed attenuation pond appears to be located within the low and medium risk zones, and the dead bird store is proposed in a high flood risk area, adjacent or on the proposed flood alleviation channel.

Figure 11 shows a plan of proposed flood mitigation, with two flood alleviation channels, designed to allow surface water to flow/ gather unimpeded by the development, along the western and northern edges of the application site, with a culvert underneath the raised access track. There is no indication of these features on the Landscaping Proposals.

The Sections drawing IP/HF/08 June 2017 does not extend to the whole site, so does not show the levels for the access road, the woodland planting or the attenuation pond.

Figure 13 in the report shows the recommended features of the SuDS components, with rain water to flow from the concrete apron along runoff channels, to the attenuation basin. This means that potentially polluted water will be entering the SuDS basin. If this is then in danger of surface water flooding, this may risk pollutants flowing off-site. SuDS features should be outside of any flood plain or areas at risk of flooding- otherwise, at times of high water levels, they will not work effectively to store run-off as they will already be full.

The site's layout and landscaping needs to show that flood and surface water management features have been adequately incorporated and located. This is not clear at present.

SUMMARY

Staffordshire Wildlife Trust submits a holding objection to the proposals, due to insufficient information and details on surface water management, habitat and species impacts, and habitat creation.

We advise the following are sought:

Information:

- A. Manure Management Plan updated to show surface water flooding areas and manure storage sites marked on the risk maps.
- B. Clarification as to whether whether cumulative impacts have been considered regarding ammonia deposition on designated sites.
- C. Assessment of the western hedgerow ('Hedgerow 3') against the Staffordshire LWS criteria for hedgerows, and confirmation of potential impacts from the access road.
- D. Re-assessment of GCN impacts in light of missing information.

Changes:

- E. Amended and additional landscaping details for hedgerow, woodland, pond and grassland creation.
- F. Flood channels, raised access track and culvert to be shown on plans. Relocate SuDS basin and dead bird store from areas of surface flood risk.

Secured through conditions should permission be given in future –

- G. Mitigation measures as laid out in the Preliminary Ecological Appraisal and GCN Appraisal. Add barn owl box if appropriate location available.
- H. Ecological Management Plan to include measures to protect, replace, enhance, manage and monitor important habitats and 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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Planning and Conservation Officer

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