Application No: 13/19142/FUL
Development: Change the use of current grazing land to provide a practice facility for riding of off-road motorbikes for all ages and abilities
Location: Land At Ashes Covert Off Seighford Lane Seighford Stafford Staffordshire
Grid reference: SJ895246
Area of site: 7 hectares

Thank you for consulting Staffordshire Wildlife Trust on the above application, received on 27/8/2013 including the following documents:

· Preliminary Ecological Appraisal 22 July 2013 by Staffordshire Ecological Services

It is not clear whether the survey follows the Guidelines for Preliminary Ecological Appraisal (IEEM 2012) as these are not mentioned in the Methodology, although they are referenced in the Bibliography (though stated as Institute of Environmental Assessment)

Data search

The 1km radius has been measured from a central point, not the site boundary as stated. This means it covers a smaller area than it should. There is, therefore, a Local Wildlife Site within 1km of the site boundary (Burleyfields BAS).

The search only included protected species records and not any priority species, despite stating that 'The proximity and nature of protected/ notable species records' had been considered, and highlighting the importance of species of principle importance in section 6. Legislative and planning context.

Results from the data search are not fully discussed; there is no mention of the several otter records on/ near the site. There are also a number of priority species records for the site and nearby area such as Brown Hare, and large flocks of Lapwing observed in autumn/ winter on the site. Lapwing have been recorded breeding in the area but the location is not precise so may not be on the site itself.

HABITATS

Wider landscape

The site is within the Central Farmland Ecosystem Action Plan of the Staffordshire BAP, and within the Mosses and Meres and Staffordshire Rivers Living Landscape project areas. In ‘A Green Infrastructure Strategy for Stafford November 2009’, the site is within a Biodiversity Intervention Zone for Wetland Management Expansion, and also a Strategic Watercourse Corridor. The priority for action in biodiversity intervention zones is to conserve, enhance and where possible extend the quality and quantity of the priority habitats within them. Specific targets for this area include sensitive land management to reduce water run-off, encouraging land adjacent to Doxey Marshes nature reserve to be managed in sympathy with the needs of the reserve, promoting wildlife and access to reduce visitor pressure.

Therefore in aiming for a net gain for biodiversity as promoted by the NPPF, an appropriate focus here would be wetland / grassland habitat, encouraging wetland and farmland birds and if possible public access.

Designated sites

Although impacts to Doxey Marshes are discussed in terms of noise, this does not take into account the role of the application site in the wider landscape around the SSSI. It is a large open piece of land within a complex of wetland habitats and grassland such as the fishing pools and wet grassland to the west (soon to be notified as a Site of Biological Importance), which makes it more likely that birds will use it as part of their habitat in the area. Therefore it will contribute to the overall ecological network around the SSSI and to the maintenance of species populations.

SPECIES

Birds

As well as the recorded lapwing, local residents have reported seeing skylark and kestrel over the site, and given the rough grassland present one would expect raptors including barn owl to use it for hunting. This use will not always be obvious from a short bird survey as undertaken. While the habitat is probably not ideal for ground nesting birds at present, it would appear from records that it is used as a wintering habitat, and the extent of this would be important to establish in order to determine the impact of the scheme and what mitigation can be achieved.

Otter

Having discussed the presence of otter records with SES, it is thought that otters are unlikely to be using areas to the north, gaining access to the fishing pools along the river, and are unlikely to be disturbed by the proposals.

Reptiles and Amphibians

No mention of herpetiles is made in the report -the site would seem suitable to support grass snake and potentially frogs and toads given the nearby waterbodies. There are several ponds within 500m, but most are far enough away to make Great crested newts unlikely, and the nearest , the fishing pools, are unlikely to be suitable. A method statement for sensitive site clearance/ construction practices to avoid harm to herpetiles would be sufficient.

Invertebrates

White letter hairstreak butterfly, which is a species of principle importance (SPI) under the NERC Act 2006, has been recorded nearby – it would be good to include some elm in new hedges, as this is the butterfly's food plant.

Brown Hare

Hares (also a SPI) will not use the site when in use by vehicles, but may do at other times, and would benefit from greater management of the site. If larger areas can be left undeveloped in one block this would benefit hares.

IMPACTS and RECOMMENDATIONS

We do not concur that no ecological impact will occur through the proposals, as some loss and disturbance will be inevitable, and the site will be less usable by wintering birds.

A wintering bird survey is required to establish bird usage of the site and detailed mitigation needed.

Avoidance is the first principle to apply when dealing with ecology impacts; therefore we suggest that rather than try to replace the grassland habitat, the layout of the tracks and car parking should be moved as far south as possible, utilising the field to the south (retaining the hedgerow) for parking and perhaps the children's track. This would enable a greater area to be left in one block to the north, retaining the semi-improved grassland and providing more than the minimum area (3 hectares) needed for skylark and other ground nesters to breed. This area could be managed for farmland birds and brown hare, thereby providing mitigation and potentially enhancement appropriate to the area. Tall boundary features should be avoided, so the restored hedge should be pruned and kept lower, and a grass bund or mound could separate the area from the bike track. If possible, some topsoil should be removed from this area to reduce fertility and species-rich grassland extended.

The bike track area itself should be managed by regular cutting to encourage wildflowers, although some can be left rough for small mammals. Any areas disturbed or excavated should be sown with a wildflower mix or bird seed crop mix to increase diversity.

The recommended hedgerow enhancement and new planting is supported; a greater mix of species such as dog rose and wytch elm should be added for the hedges to count as 'species rich' and therefore contribute towards county BAP targets.

SUMMARY

Staffordshire Wildlife Trust submits a holding objection to the proposals, due to the need for further information on bird use of the site, and an amended layout to minimise impacts, provide mitigation and achieve enhancement commensurate with BAP and green infrastructure priorities for the area.

We advise the following are sought:

Before determination –
A. Wintering bird survey to establish use, inform mitigation and provide baseline
B. Amended site layout to avoid semi-improved grassland and leave a larger area for mitigation purposes.

Secured through conditions should permission be given in future –

C. Method statement for sensitive site clearance to avoid herpetiles and birds
D. Detailed landscaping and management plan including hedge restoration/ planting, grassland enhancement, seeding, and bird monitoring to show mitigation has been effective.

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,

Kate Dewey BSc (Hons) MCIEEM