

Via email

Planning Directorate
3rd Floor
Fry Building
2 Marsham Street
London

29th October 2020

Planning for the Future Consultation

Dear Planning Directorate,

Staffordshire Wildlife Trust (SWT) is a local nature conservation charity established in 1969 to further the protection and enhancement of wildlife and promote understanding, enjoyment and involvement in the natural world across Staffordshire. SWT has nearly 17,000 members and 700 volunteers, and manages 30 nature reserves totalling nearly 3800 acres. SWT is a lead partner in a number of landscape scale nature conservation schemes which aim to restore and create wildlife habitat and promote opportunities for local communities to access wildlife. For decades we have worked to gain positive outcomes for wildlife through the planning system, and input to consultations and projects of all scales, from local and neighbourhood plans, to major infrastructure and small-scale developments.

SWT fully supports the response to this consultation submitted by The Wildlife Trusts, and the headline requests for planning reform:

1. Wildlife recovery and people's easy access to nature must be put at the heart of planning reform by mapping a Nature Recovery Network.
2. Decisions must be based on up-to-date and accurate nature data with a full program of investment in place to gather, analyse and hold data appropriately.
3. Nature protection policies and standards must not be weakened, and assessment of environmental impact must take place before development is permitted
4. The ecological and climate crises must be addressed by protecting new land in recovery through a new designation – Wildbelt
5. People and local stakeholders must be able to engage fully with the planning system at all stages, and have the information they need to understand the impacts of plans on nature, and on communities.

We also agree that reforming planning policy alone will not solve the issues of delivering high quality, sustainable development- because many other factors are constraining this.



The Wolsley Centre
Wolsley Bridge
Stafford
ST17 0WT
Tel: 01889 880100
Fax: 01889 880101
info@staffs-wildlife.org.uk
www.staffs-wildlife.org.uk

Chairman
Richard Higgs
Chief Executive
Julian Woolford

Registered Charity No. 259558
Limited Company No. 959609
Registered Office: The Wolsley Centre
Wolsley Bridge, Stafford, ST17 0WT

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Looking after **Staffordshire's Wildlife**



Planning policy is still not perfect, but the formation and review of the National Planning Policy Framework since 2012, and the modernisation of many local plans to include green infrastructure, climate change and net gains for biodiversity, has made it clearer and easier to secure green design. We have seen under this same policy framework, some fantastic best practice, but much more poor practice. The main difference has been time, knowledge and resources, not policy. Success is determined by presence or absence of: good environmental data early in the process, sustainability designed in from the beginning, knowledgeable and experienced professionals among developers, council and NGOs, community input, joint working, positive aspirations and ongoing site management, monitoring and enforcement. The point being, that good planning requires the input of adequate data, time, knowledge and people to do the work. Therefore we very much support calls for proper funding for the planning process and the bodies that implement it. Even perfect policies will not result in sustainable development without the means to enact them.

Well-evidenced local plans with clear, usable policies help avoid 'last minute' wildlife issues and give developers more certainty. A lack of good evidence causes conflicts, surprise issues and expensive delays later in the process. Most existing Local Plans in Staffordshire do not have an environmental evidence base that matches the requirements of the National Planning Policy Framework, although this is improving as new plans progress.

In development management we find, in general, larger projects that are owned and maintained by those developing them, such as quarries, road schemes, business parks and sports facilities have been among those that deliver the most positive result for people and wildlife. Housing sites, usually sold off by developers, are among the more difficult to balance environmentally, due to the pressures of space, viability and long-term care of the sites. Enforcement is under-resourced and relies largely on the public reporting problems. Information is hard to access for many local stakeholders, so specialist issues and hidden problems are easily missed.

Rather than repeat the substantial evidence submitted by The Wildlife Trusts, we would like to illustrate these issues with some local examples.

HS2 – Discoveries and destruction

It is a surprise to many to find that information on the location, value, and even existence of important habitats is incomplete in many counties. Not only for basic data on habitat types present, but on priority habitats, Annex 1 habitats (listed under the Habitat Regulations), Local Wildlife Sites, SSSIs, European designations and even irreplaceable habitats.

The Ancient Woodland Inventory for England does not include most ancient woods under 2 hectares in size. Because so many smaller woods exist, this was the cut-off threshold when the initial database was created in the 1980s. The many hundreds of smaller, un-listed



ancient woodlands must be assessed and added gradually, often when a specific study, or threat, enables this to be done. The veteran tree inventory is being continually updated, largely by volunteers. Other irreplaceable habitats (such as peat bogs, saltmarsh, lowland fen, ancient hedgerows) are less well defined or understood than ancient woodland, and again, most of the smaller examples have not been fully assessed or recognised. This means they can be threatened unnecessarily purely because no-one knows their true value.

Local Wildlife Sites (LWS) are non-statutory locally designated sites, vital parts of the nature network linking nationally and internationally important sites. Due to the way that only a sample of habitats are designated as SSSIs, many LWS support very scarce and irreplaceable habitats of a similar level to SSSIs. LWS inventories are incomplete in many areas due to lack of permission for access, and funding for survey. New LWS are regularly found through planning applications, when detailed ecology surveys are carried out on sites for the first time. In one Staffordshire district, 6 new sites proposed for development have been found to meet LWS criteria in the last 18 months. These late discoveries threaten wildlife, re-rail proposals and make planning a nature network in advance more difficult.

No project is a better illustration of this data gap than HS2. Phase 1 and 2a will run the width of Staffordshire, across areas that have seen little previous survey.

On the 12 miles of the Phase 1 route in Staffordshire near the city of Lichfield, 11 new LWS have been designated in the years since the route was announced. The initial Environmental Statement prepared by HS2 assumed all ancient woodlands were accounted for, but after many organisations pushed for further assessments, HS2 studies found several new woods on the route which were added to the inventory in 2015. Three of these are in Staffordshire and will all suffer major losses. One small wood will be halved by a road diversion; discovered too late to change the design. Another, Little Lyntus, home to scarce woodland plants, veteran trees and rare small-leaved lime coppice, will be destroyed completely.

On Phase 2a, running 34 miles across Staffordshire, it is the same story, with 8 'new' ancient woodlands being found in the construction area. Other irreplaceable and Annex 1- listed habitats have also been under-recognised. One site to be cut in half by the route, Lount Farm, meets SSSI designation criteria for its hay meadow and ancient water meadow, but is currently only designated as a LWS. At least two other sites support other irreplaceable habitats (inland saltmeadow, lowland fen), and a number of potential ancient hedgerows are under investigation by SWT. So far on Phase 2a, 14 LWS have had their value or size increased, half of which involved entirely new areas being designated. This is all down to work by SWT, with dozens more potential sites needing further study.

If these sites had been mapped and designated before a route was chosen and assessments prepared, could more have been done to avoid them? Information is vital to understand and restore natural systems to achieve sustainable development. Without proper protection, irreplaceable habitats will still be lost 'where the public benefit would clearly outweigh the loss or deterioration of habitat.'



Landowners, residents, wildlife recorders, Local Records Centres, Wildlife Trusts and other environmental charities know their area and work hard to bring issues to light with scant resources. DEFRA and its component bodies need proper funding to research and protect important areas so that councils and developers don't have to. It is important that stakeholders are supported and heard in the planning process, providing vital local knowledge. So often however, it takes a huge amount of time, money and expertise to fight for proper information, protection and design. The natural environment has been starved of resources, and our landscape is all the poorer for it.

Little Lyntus Ancient Woodland- discovered in 2015, felled in 2020.



Chorlton Moss Local Wildlife Site – A battle for a bog

Chorlton Moss lies on the edge of Baldwin's Gate, a desirable village location in northern Staffordshire. It is a 'degraded lowland raised bog capable of restoration' – a habitat listed under Annex 1 of the Habitat Regulations and also considered irreplaceable. It is one of only a handful of raised bogs known in the county, part of a network of meres and mosses across the Midlands, formed in hollows left by retreating glaciers. Peatland sites are not only a unique habitat for wildlife, but a huge carbon store, a flood control, and a geological record that has taken thousands of years to form. They are sensitive to changes in the surrounding land and water input and need a wide area of healthy habitats around them if they are to survive. Healthy peatlands soak up carbon almost indefinitely, whereas damaged ones release it. The need to restore peatlands in the face of climate change has been highlighted in the 25 Year Environment Plan, and funding is now being provided by government.



Already squeezed by existing housing, land drainage and tree colonisation, Chorlton Moss still holds a large amount of peat and supports several scarce plants. Natural England drew up a restoration plan for the site in 2009, which involved raising water levels and managing habitat to encourage sphagnum moss, to reactivate peat formation. However, the site is in private ownership and no restoration has yet been possible. Because it is not designated as a SSSI or a SAC, Natural England has no means to get further involved.

In 2016 Staffordshire Wildlife Trust and a committed group of local residents opposed two applications to build 99 homes up to the edge of the moss, including stabilisation of the peat beneath the site with cement. The local council, with no ecologist and no 5-year housing supply, initially recommended approval, but were confident in refusing the plans once the impacts became clear. The site was specifically mentioned as a natural asset in the council's Biodiversity Opportunity Mapping Report, which identified important wildlife sites and actions for their conservation. Housing would have threatened the site's hydrology and prevented any future restoration. After accurate surveys were demanded, the development site itself was found to support such diverse meadows that it was eventually designated and added to the LWS. The developers appealed against the refusal, but after expert evidence was submitted, finally withdrew.

Without local stakeholders gathering evidence and challenging the house builders, it could have been very different. Very little was known about the site's geology, hydrology and ecology until the planning process meant this was scrutinised. Only the core bog habitat had been designated, while the wet meadows essential to its health had never been surveyed due to lack of access and resources. Staffordshire's LWS designation criteria were updated as a result, to reflect emerging best practice in peatland conservation. Saving Chorlton Moss took the dedication of a local campaign group, several Staffordshire Wildlife Trust staff, and a highly qualified wetland expert commissioned by the council to help fight the appeal. With the right protection in place beforehand, this costly battle need never have happened.

This highlights the importance of empowered local organisations, nature network mapping, good ecology data and proper designation of irreplaceable sites. A well-evidenced Wildbelt designation would also protect isolated sites, with enough land for nature's recovery, taking the guess-work out of decision making and allowing restoration projects to be planned and funded. Will the zoning approach proposed by the reforms protect these sub-urban wildlife sites and their wider life support systems?





Redhill Business Park - Regeneration and Ramblers

Owned and designed by Staffordshire County Council, this development just off junction 14 of the M6 was shortlisted for “Best Practice in Large-Scale Practical Nature Conservation Award” at the 2016 CIEEM awards. As you walk around the site on the circular path, through woodland copses, across a boardwalk past newt ponds and flowery drainage swales, it feels like a country park that happens to have buildings in it. This has proved key to the success of the park, with several companies stating that the quality of the environment was an important factor in deciding to occupy the site. It is now a well-used walking destination for employees and local residents. It has even started its own small Wildbelt- with a new application alongside aiming to match the green design and deliver net biodiversity gain.

Although the site was formerly farmland, it contains a rare wet woodland Local Wildlife Site, small woodlands and ponds, badgers and a large population of great crested newts. These ‘constraints’ needed to be retained, but were integrated into the design by putting ecological considerations at the top of the agenda throughout the project. The importance of green infrastructure was recognised early on, and full ecological surveys were conducted to inform the design. Key habitats were avoided and new ponds, hedges and swales were created, to ensure sustainable drainage maintained water flows to the wet woodland. Staffordshire Wildlife Trust worked with the council to create wildflower meadow areas with hay collected from the local Motte Meadows National Nature Reserve and SSSI. Mammal tunnels under the roads ensure badgers, newts and other creatures can travel safely, and the few trees that could not be avoided are now natural benches dotted along the paths. This is now a multi-functional place with its own character, where you can watch dragonflies in your lunch hour. Heath, wealth and wildlife work together.



Nature works - newt pond and wildflowers surround a business unit at Redhill



We know how to build better, greener and healthier places, where nature can solve the problems we are facing. Whether this is air quality, flooding, climate change or a global pandemic, we all know that natural habitats on our doorstep are not just nice to have, but essential to our long-term wellbeing and prosperity. We are calling on the government to give everyone involved not just the policies, but the information and resources to make the system smarter, smoother, and truly sustainable.

Yours sincerely,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer

