Clowes Development Ltd

Land at Lawnswood, Wordsley

REPRESENTATIONS IN RESPECT OF ECOLOGY

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1.0 INTRODUCTION

1.1 The following report has been prepared on behalf of Clowes Developments Ltd and provides an assessment of the potential ecological interest of, and potential for biodiversity net gain on, a site located off Lawnswood Road, Wordsley (hereafter referred to as 'the Site').

1.2 FPCR Ltd. is a multi-disciplinary environmental and design consultancy established over 60 years, with expertise in architecture, landscape, ecology, arboriculture, masterplanning, urban design and environmental impact assessment. The practice is a member of the Landscape Institute and Institute of Environmental Management and Assessment and is frequently called upon to provide expert evidence on environmental matters at Public and Local Plan Inquiries.

Site Context

1.3 The Site comprises of land covering c.56.25 hectares located off Lawnswood Road, to the west of Stourbridge, in the South Staffordshire District. The Site largely comprises several parcels of arable land with smaller areas of grassland, woodland and ponds. Further arable land lies adjacent to the site to the north, south and west. To the east is the urban extent of Stourbridge.

Development Proposals

1.4 The Site has been put forward to the South Staffordshire Council to be allocated within the emerging Local Plan for residential development.

Scope of Report

1.5 This Ecological Representations report describes the likely current ecological interest within and around the Site, which has been identified through standard desk-based investigations. It then considers the potential ecological impacts and opportunities for ecological enhancement that could arise from residential development at the Site in the context of relevant legislation and planning policy. Finally, it identifies the likely necessary additional surveys required as well as measures to avoid, mitigate or provide compensation for potential impacts, and the mechanisms for securing such measures.

2.0 METHODOLOGY

Desk Study

2.1 In order to compile existing baseline information, relevant ecological information on designated sites was requested from the Multi Agency Geographic Information for the Countryside website (www.magic.gov.uk).

2.2 Further inspection, using colour 1:25,000 base maps (www.ordnancesurvey.co.uk) and aerial photographs (maps.google.co.uk), was also undertaken to identify the potential habitats within the Site and to identify any features of potential importance for nature conservation (such as ponds) and in the wider countryside.

2.3 The search area for designated sites was related to the significance of the designation and the potential zones of influence (ZoI)[1], as follows:

[1] Zone of Influence - the areas and resources that may be affected by the proposed development.

- 15km around the Site for sites of International importance (e.g. Special Area of Conservation [SAC], Special Protection Area [SPA] and Ramsar);
- 2km around the Site for sites of National, Regional or County Importance (e.g. Sites of Special Scientific Interest [SSSI], National Nature Reserves [NNRs] and Local Nature Reserves [LNRs]).

2.4 The designated site results are summarised in **Figure 1**, the likely habitat baseline is displayed in **Figure 2** and the network of water bodies is displayed in **Figure 3**.

3.0 RESULTS

Statutory Designations

3.1 The Site itself is not covered by any statutory designations.

3.2 Fenns Pools SAC lies 3.9km northeast of the Site. It is designated for it's great crested newt (GCN) *Triturus cristatus* population.

3.3 Checkhill Bogs SSSI lies 1 km west of the Site. This consists of three areas of wet woodland along the course of the Spittle Brook, a tributary of the river Stour.

3.4 Wollaston Ridge Quarry lies approximately 1.9km south of the Site but this is designated for geological reasons and is thus outside the scope of this report.

3.5 The Site does not fall within a SSSI Impact Risk Zone[2] for which Natural England need to be consulted on residential impact.

Habitats

3.6 The habitats identified during the desk study a are shown on **Figure 2** and comprise:

- Arable Land
- Buildings and Gardens
- Grassland
- Broadleaved Woodland
- Ponds
- Hedgerows
- Trees

[2] The Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.

Fauna

Bats

Roosting

3.7 The Site contains a single building and several mature trees, mostly in association with the hedgerows, that could potentially support roosting bats.

Foraging/commuting

3.8 The Site was deemed to have low suitability to support foraging and commuting bats in the arable areas. The grassland, hedgerows woodland and trees offer higher quality habitat for foraging bats and link to other areas in the wider countryside.

3.9 The field boundary habitats likely support bat foraging and commuting behaviours, particularly those that link to higher quality woodland and pond areas in the local area. The Site itself is not considered likely to be of high strategic significance to bats locally.

Breeding Birds

3.10 The arable land could support low numbers of ground nesting species such as skylark *Alauda arvensis.*

3.11 The boundary hedgerows and trees and woodland are likely to support a range of common and widespread breeding bird species, though the surrounding woodland areas are considered to provide higher quality habitat.

3.12 The Site itself is not considered likely to be of high strategic significance to birds locally.

Amphibians

3.13 There are four ponds within the Site boundary (P1-4 on **Figure 3**) and a further one within 500m of it (P5 on **Figure 3**). Pond P5 lies on the other side of the A449 which is considered to be a barrier to newt dispersal and thus has no connectivity to the Site and is not considered further. Fenns Pools SAC lies 3.9km northeast of the Site which is designated for its great crested newt population.

3.14 Further survey will be required on the ponds within the Site boundary to determine the presence or absence of GCN. Should GCN be present the habitats present within the Site offer limited potential to be used by GCN and there will be scope within the development design of the scheme to accommodate any mitigation required to ensure the favourable conservation status of the species is maintained but the development would have to be completed under a European Protected Species licence in respect of GCN from Natural England.

Reptiles

3.15 The arable areas of the Site are likely to have very limited suitability for reptiles, with the grassland and hedgerows being likely to provide some suitable habitat for common reptile species. This grassland is relatively isolated by a road network and extensive tracts of arable land and thus any populations present are likely to be small.

Badger

3.16 The Site is likely to provide foraging and sett building habitat for badger *Meles meles*.

Other Notable Mammals

3.17 The woodland, grassland and hedgerows provide habitat for hedgehog *Erinaceous europaeus* and the grassland and arable land provide habitat for brown hare *Lepus europaeus*. There is an extensive amount t of similar habitat in the wider area and thus the Site is unlikely to hold strategic importance to these species locally.

4.0 ECOLOGICAL CONSTRAINTS AND OPPORTUNITIES

Statutory Designations

4.1 Fenns Pool SAC standard data form[3] identified threats from outside the site as other ecosystem modifications and pollution to ground water. At almost 4km away and with non-terrestrial or hydrological connectivity, development at the Site is unlikely to impact this SAC.

Habitats

4.2 The degree to which habitats receive consideration within the planning system relies on a number of mechanisms, including:

- Inclusion within a specific policy, for example veteran trees, ancient woodland and linear habitats within the National Planning Policy Framework (NPPF);
- A non-statutory site designation;
- Habitats considered as habitats of principal importance for the conservation of biodiversity as listed within Section 41 (S41) of the NERC Act 2006; or
- Habitats identified as being a Priority Habitat within the local Biodiversity Action Plan (LBAP).

4.3 The onsite habitats identified which fall within the above listed categories are the hedgerows and associated trees, woodland, ponds and potentially the grassland.

4.4 The ecological importance of the habitats and thus the importance for retention and enhancement within the Site design is shown on **Figure 4**.

4.5 The priority for retention is the areas of woodland. These habitats are a 'medium' distinctiveness habitat. These areas are displayed in red on **Figure 4**.

4.6 The grassland, ponds and hedgerows are also recommended for retention wherever possible. These are medium distinctiveness habitats that should be retained, albeit none of these habitats are likely to be irreplaceable habitats that which cannot be mitigated in the open space of the Site. These habitats are coloured orange on **Figure 4**. Dependant on the condition of these habitats, there may be scope for enhancement of the biodiversity value of these areas.

4.7 The arable land has a low biodiversity value. It is recommended that the development footprint be located on these areas for minimal biodiversity loss and maximum scope for biodiversity enhancement. These areas are coloured yellow on **Figure 4**.

4.8 The sealed surface and vegetated garden areas have minimal biodiversity value such that development in these areas will have no biodiversity loss. These are coloured green on **Figure 4**.

[3] https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030150.pdf

BIA

4.9 The baseline value of the Site has been estimated. The habitats have been determined using aerial imagery and the conditions have been assigned as moderate. The Site currently consisted of approximately:

- 42.05 ha of arable land (84.10 units);
- 0.13 ha of sealed surface (buildings and carparks) (0 habitat units);
- 0.16 ha vegetated gardens (0.32 habitat units);
- 10.65 ha grassland (presumed 'other neutral grassland') (85.18 habitat units);
- 3.02 ha woodland (presumed 'other woodland; broadleaved') (24.15 habitat units);
- 0.24 ha ponds (presumed non-priority ponds) (1.93 habitat units);
- 0.6km native hedgerow with trees (5.28 hedgerow units); and
- 5.01 km native hedgerows (20.05 hedgerow units)

4.10 This gives the Site as estimated baseline value of 195.69 habitat units and 25.33 hedgerow units.

4.11 Whilst the exact habitat type and condition is based on assumptions at this stage, the level of survey completed is considered sufficient to determine the areas of highest biodiversity value within the Site. Therefore, those areas recommended for retention will remain the same when the exact Site value is determined.

4.12 It is recommended that the majority of the hedgerows and mature trees and all of the woodland, pond and grassland areas be retained within the designated green space. On a site of this size, these hedgerows can be incorporated into areas of green space including extensive green corridors that strengthen any existing, as well as create new, links to the surrounding area and the habitats it provides. Their incorporation as boundaries to private gardens should be avoided where possible and links should be strengthened to the existing area of grassland and ponds.

4.13 Due to the low-quality habitats currently present at the Site, development at the Site has the potential to provide and enhance overall biodiversity within the green infrastructure by creating additional habitat types of local importance such as wetland areas (attenuation/SuDS features) as well as creating mixed scrub and woodland areas and a range of high diversity grasslands.

Fauna

4.14 Further surveys are required to determine which species utilise the Site and the extent to which they are dependent on the Site. Habitat creation as described above would increase foraging and sheltering opportunities on the Site for a range of protected and notable species including species not currently present.

Bats

4.15 The Site is likely to provide foraging and commuting opportunities along the hedgerows and woodland boundaries and within the grassland area as well as providing potential roosts within some of the mature trees. A majority of these opportunities can be retained within a Site of this size. The green corridor creation opportunities described above will enhance the permeability of the Site for bats and other fauna by providing stronger green links to the wider area and high-quality areas on the Site. The enhanced habitat diversity, particularly the wetlands, woodlands

and high diversity grasslands recommended will also enhance invertebrate diversity and thus foraging resources for bats.

4.16 As good practice, to minimise potential effects to the local bat population, artificial lighting at the peripheries of the Site and onto any retained or created green infrastructure should be carefully designed in order to minimise light spill onto these areas. This could be achieved through a combination of positioning of fittings/luminaires and other design features such as directional hoods/baffles, timers, low level bollards, etc., to maintain 'dark zones' in key locations and along habitat corridors.

Breeding Birds

4.17 A majority of the breeding opportunities for birds within the Site can be readily retained within green infrastructure. Whilst there will be some loss of habitat for ground nesting birds as a result of development at the Site, there would continue to be abundant alternative suitable habitat surrounding the Site and throughout the local area.

4.18 The habitat creation opportunities described above will provide nesting opportunities for a range of bird species in the form of additional woodland, trees and scrub habitats. New wetland creation and planting of fruit and seed-bearing trees and shrubs will enhance food sources.

4.19 Further enhancements in the form of the provision of a variety of bird nest boxes on retained trees and/or new buildings would provide additional opportunities for a variety of species.

Great Crested Newts and Other Amphibians

4.20 The habitat retention recommendations described above will retain the breeding habitat for any amphibians (including great crested newt) on the Site and the habitat creation opportunities described above will provide additional opportunities in the form of additional wetlands, woodland, trees and scrub habitats. Should GCN be present within the Site and a licence be required, there is adequate scope on the Site of this size to provide the mitigation area required.

4.21 Any new SuDS/attenuation features should where possible be sensitively designed to provide suitable breeding habitat. Enhancement/creation and sympathetic management of grassland, scrub and woodland habitats could provide high quality terrestrial habitat that links these features, and it is recommended that the creation of wildlife ponds is incorporated into the site green infrastructure. Additional opportunities to provide enhancement for amphibians include the installation of log piles and hibernacula throughout green space in the vicinity of the SuDs/attenuation features or any wildlife ponds created.

Reptiles

4.22 Small numbers of reptiles could potentially use the woodland, grassland and hedgerows on the Site and these habitats are recommended for retention and enhancement. The potential increase in habitat diversity that would result from development at the Site could increase the quality of habitat available. Provision of green space at the site boundaries and linking to the surrounding valuable habitats off-site will retain the site permeability for reptiles. There are additionally opportunities for the creation of sheltering and hibernation habitat through installation of hibernacula and log piles within the green space, especially around the SuDS.

Badger

4.23 Badgers could potentially use the Site with the highest quality habitats recommended for retention and enhancement. The potential increase in habitat diversity that would result from development at the Site could increase the quality of habitat available. Provision of green space at the site boundaries and linking to the surrounding valuable habitats off-site will retain the site permeability for badger and there is scope on a Site of this size to locate and alternative sett should one be required.

Other Mammals

4.24 It is considered that the potential for habitat creation at the Site as discussed above will also provide additional opportunities for hedgehog. Further enhancement such as provision of log piles or hedgehog houses could easily be incorporated into retained and created habitats.

Further Surveys

4.25 A suite of further surveys will be required to accompany any future application on this Site. These include:

- Detailed habitat surveys and condition assessments of non arable habitat (hedgerows, woodland, scrub and grassland);
- Bat Activity surveys (a combination of walked transects and static detectors);
- Bat Roosting Surveys (of any trees deemed to have roost potential and require removal);
- Badger Survey (to determine the status of the existing setts);
- Great crested newt survey on the four ponds within the Site boundary;
- Reptile surveys of the grassland area; and
- Breeding Bird Survey (particularly for farmland specialists).

5.0 CONCLUSIONS

5.1 The desk- and field-based baseline investigations have demonstrated that the habitats present within and around the Site do not pose an 'in principle' constraint to the residential development at the Site. Further surveys are required to determine the protected and notable species using the Site, but it is considered any required mitigation can realistically be included within the greenspace on a site of this size.

5.2 Development at the Site has the potential to increase not only the grassland diversity but also the overall habitat diversity, especially on the arable land areas. This, in turn, will increase the diversity of faunal species that the Site can support. It is considered unlikely there are any protected or notable species or habitats present that cannot be accommodated, and additional opportunities provided for, within on-site green infrastructure.