
From: Steve Bloomfield
Sent: 25 March 2020 14:58
To: Aldridge, Steven
Subject: FW: Planning application 19/000053/CM - Proposed Quarry at Land at Lea Castle Farm

Hi Steve,

My comments as promised.

Hope they are of use.

Thanks a lot,

Steve

Steven Bloomfield
Senior Conservation Officer – Planning
Worcestershire Wildlife Trust

From: Steve Bloomfield
Sent: 20 March 2020 10:17
To: saldridge@worcestershire.gov.uk
Subject: Planning application 19/000053/CM - Proposed Quarry at Land at Lea Castle Farm

Dear Steve,

Thank you for sending us details of this application. Please accept my apologies for the late reply.

We note the contents of the various associated documents and in particular the findings set out in the Environmental Statement and EclA reports. In light of the findings presented in the ecological surveys and the very welcome restoration strategy we do not wish to object to the principle of mineral extraction here. However we are concerned that at least one veteran tree is being removed. Current NPPF policy makes clear that removal of such trees should only be allowed where there are wholly exceptional reasons and a suitable mitigation strategy is in place. We do not believe that this is the case here and so we very strongly recommend that you seek additional information prior to determining the application.

Should 'exceptional reasons' be demonstrated we would recommend that a suitable mitigation strategy should include the translocation of the bulk of the tree as a single unit to a safe part of the site where it can be re-erected to remain as standing dead timber for the future. We would also recommend that a similar approach be used for any mature trees that are removed. This sort of mitigation is already being used elsewhere in the county and we would be pleased to provide further details if that would be helpful.

In the meantime, we are content to defer to the opinions of the county ecologists for all other on-site biodiversity issues. However, our position is contingent on the council being able to append conditions covering the following matters to any permission it may be otherwise minded to grant.

1. CEMP – to include protection for retained trees and other ecological features and prevention of pollution during extraction and infilling, especially in relation to runoff and risks to the Local Wildlife Sites.
2. LEMP – to include biodiversity enhancement in line with recommendations in the submitted documents and policy, together with long term management of that enhancement. We would recommend that this document includes a section on soil management so that restoration of acid habitats can utilise the most appropriate soil types, which may need to be subtly different to those across the rest of the site.

3. Lighting – to ensure that required illumination does not cause harm to nocturnal wildlife, including bats that may be foraging or roosting on the site.
4. SUDS – to ensure that long-term surface water drainage does not cause harm to receiving watercourses. Commentary on the liner needed to reduce the risk from imported waste will be important here.
5. Noise and vibration – to ensure that working practices limit adverse effects on wildlife as far as possible, in line with guidance and legislation.

Appropriate model wording for such conditions can be found in Annex D of BS42020:2013 Biodiversity – Code of practice for planning and development.

I hope that these comments are of use to you but please do not hesitate to contact us again if we can be of further assistance.

Best Wishes,

Steve
Steven Bloomfield
Senior Conservation Officer – Planning

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