worcestershire countycouncil

To	Steven Aldridge, Team Leader (Development Management)	**M E M O**	
From	Cody Levine, Team Leader (Ecology)	**Date**	27th August 2021

REFERENCE NUMBER: **Planning application 19/000053/CM**

SITE LOCATION: **Land at Lea Castle Farm, Wolverley Road, Broadwaters, Kidderminster, Worcestershire**

PROPOSAL: **Submission of Further Information in respect of the Environmental Statement relating to the following planning application: Proposed sand and gravel quarry with progressive restoration using site derived and imported inert material to agricultural parkland, public access and nature enhancement**

Dear Steve

Request for clarification: ancient woodland protection measures and BNG evidence.

Thank you for your consultation. The Minerals Planning Authority has sought further information through a Regulation 25 request on 3 key biodiversity issues as relates to the potential for impacts within both the scheme's red line boundary and wider 'zone of influence' on: 1) designated sites of conservation importance, 2) priority habitats and 3) potential for development-led impacts on protected species. Having had opportunity to review the further information submitted I can offer you the following comments.

Designated sites of conservation importance

A key matter for this scheme was assurance that hydrologically connected offsite designated sites would be adequately protected from potential adverse impacts. I note concerns were shared by EA in their consultation response of March 2020, and Natural England in their consultation response of March 2021, alongside model conditions for the monitoring and control of groundwater and surfacewater.

Based on implementation of those conditions and ongoing liaison on surface water conveyance and aftercare, neither EA, NE nor North Worcestershire Water Management teams have raised on objection with regards unacceptable risk of impact to a designated site. I will defer to the expertise of my colleagues in this arena and will also be satisfied if

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suitable conditions controlling monitoring and management of mitigation measures are secured.

Protected Species and Irreplaceable Habitats

I note with concern objections raised by WFDC with regards dormice (a European Protected Species) and veteran trees. This has been a matter of focus for our previous requests for further clarification and so I ask for your forbearance while considering these matters more closely:

Firstly, focusing on dormice, the WFDC objection (via email dated 20th August 2021) appears to relate to several key issues:

1. A question of clarity in the extent of area subject to assessment/survey for dormice
2. That the applicant's report identifies a need for 'more detailed' dormouse surveys, triggered in part by habitat fragmentation and loss, which have not been provided
3. Concern that retained habitat would be subject to disturbance to dormice (should they be present)
4. Concern that such disturbance may entail fragmentation or loss of dormouse habitat.

Additionally, as per my email (dated 14th December 2020) and in conjunction with WFDC, a number of questions were raised through the Regulation 25 consultation with regards the dormouse survey work provided, namely:

5. (relating to item '1' above) a request for a map of dormouse survey area extent
6. Request for evidence of dormouse surveyors' competence (i.e. their experience and qualifications) to undertake the survey
7. Confirmation that the survey methods (i.e. methods used for surveying dormice) were compliant with Natural England standing advice
8. Confirmation of rationale for any departures from Natural England standing advice (i.e. reasons why only nut search survey method was selected rather than nest-box, nest-tubes or footprint tunnels).

In evidencing consideration of dormouse within the scheme, the applicant has offered:

- Technical Appendix B – Nature Conservation and Ecology (KEDD Ltd, April 2019)
- Dormouse Survey Report (Heatons, November 2020), and
- 'Areas Surveyed for Dormice Presence', drawing reference KEDL-004-M (ED-009) (Heatons, April 2021)

- ’17 Further Response to Comments Relating to Dormice’, an undated letter-style report (document creation date 29th April 2021), issued by Heatons.

Turning first to the question of survey area selected. I believe the April 2021 map provided clearly identifies extent of habitat surveyed, and the accompanying 2020 report and April 2021 letter-response confirms dormouse survey limitations and extent of habitat containing hazel (a key but not exclusive foodsource for dormice which also provides opportunity to identify characteristic foraging behaviour). In this respect I have no objections to the area surveyed as I believe all accessible suitable habitat for dormice across the site and in its immediate locality have been subject to ecological assessment, with limitations recognised sufficiently so as to be compliant with Clause 6.7 of British Standard BS42020:2013 Biodiversity – Code of practice for planning and development.

I did not identify where in the aforementioned documents the applicant has concluded a need to undertake nesting dormouse surveys. Conversely, the ecologist considers the habitat classes and structure present as offering sub-optimal opportunities for dormouse, in the form of woodland with poor structure and defunct hedgerows, both of which will be retained and protected within the proposed scheme. They conclude the site is of ‘*negligible’* importance for dormice and I find no reason to disagree. In their 2021 letter-response the applicant states that “*It is not considered that nut searches were required, however for completeness these surveys were carried out*”. This is an important issue as an appropriate survey methodology is provided based on habitat suitability and nature of impacts, Natural England standing advice stating that:

> *You can limit surveys to visual searches for nests and opened nuts if the work only involves losing a small amount of habitat, for example:*
>
> - *gaps in hedgerows*
> - *removing a small amount of bramble scrub*

Natural England standing advice cautions that this approach must not be used to evidence dormice are absent from a site, and sets out a methodology for ‘nut searches’ (to identify hazel nuts bearing characteristic marks of dormouse foraging) as being no less than 100 nuts per survey occasion, requiring these to be undertaken between September and December. The 2018 and 2020 nut searches were undertaken within the required seasonal timeframes, and so comply with the seasonal requirements set out by Natural England. Additionally, standing advice states that survey data should be no less than 3 years old (notwithstanding significant changes to the site), and so I am of the opinion that dormouse survey data is sufficiently up-to-date to inform the decision-making process, and in this regard compliant with Clause 6.2 of BS42020:2013 (adequacy of ecological information).

Furthermore, the applicant has provided detail as to the appropriate levels of competence of surveyors who have undertaken site assessments and surveys for dormouse. I believe this satisfactorily demonstrates compliance with BS42020:2013 Clause 4.3.2 with regards suitable technical competence and experience to carry out the task performed.

I believe this satisfactorily addresses matters 1, 2, 5, 6, 7 and 8 above.

Turning next to the issue of habitat loss, I note that no suitable habitat for dormouse will be removed through the proposal, the applicant has stated (Further Response to Regulation 25 Consultation, April 2021) that "*All optimal areas of habitat, which consist of the surrounding woodland, are to be retained during the extent of the work*" and furthermore, that through the restoration strategy there will be a net gain in suitable habitat for dormouse if appropriate restoration including landscaping and a scheme of ecological monitoring and management are secured. As I believe this is achievable through imposition of suitably worded condition, I am minded that matter 4 is satisfactorily addressed.

Turning to the more complicated matter of potential for disturbance to cause deterioration and fragmentation of habitat and habitat networks for dormice (if present). I note that the applicant states (letter-response, April 2021):

> *It should be further considered that, even in the unlikely case that dormice were present within a 50m buffer of the site, limited recommendations could be provided for a mitigation strategy and a licence would still not be required from Natural England. As part of the proposed works, there is to be a minimum stand-off of 10m from the boundary woodlands of the site. In some areas of the site this stand-off would be as high as 95-100m. Combined, this would ensure that in the unlikely case that any dormice are present within the site boundary woodlands, that no dormice would be disturbed during the extent of the works.*

The Ecological Impact Assessment (PSL Report Reference M16.176(a).R.006, April 2019) also states (at paragraph 8.8) that a 10m stand-off from woodland along the northern, western and southern boundaries would be observed.

I am not assured that mineral extraction operations within 10m of woodland edge would have no detrimental effect on woodland quality.

The Worcestershire Habitat Inventory identifies 'Wolverley Lodge' (site reference 87023, contiguous on the north-west of the site) and Wolverley Carr (site reference 87026, located just beyond Wolverley Lodge, on the banks of the Staffordshire and Worcester Canal) as

part of the local Ancient Woodland Catalogue, and so should be treated as an irreplaceable ancient woodland habitat.

While neither Wolverley Lodge nor Wolverley Carr are listed on Natural England's Ancient Woodland Inventory, this is not surprising given that woodlands <2hectares in size were not originally recorded systematically on the AWI. Natural England ancient woodland advice is nevertheless clear it is applicable to all ancient woodlands, whether identified on the AWI or not. This was brought to the applicant's attention in our Regulation 25 consultation (June 2020) when we stated that "*The Worcestershire Habitat Inventory shows that the woodland bordering the northern and western edges of the site have been included in the county Ancient Woodland Catalogue (WNCT, JJ Day, 1983) as "Wolverley Lodge" (reference 87023). In view of this, the Mineral Planning Authority seeks further information regarding the proposed mitigation strategies in relation to this ancient woodland, and their suitability for protection of ancient woodland habitats*".

The Woodland Trust's Planning for Ancient Woodland guidance (July 2019) states that "*As a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice*". Current Natural England Forestry Commission standing advice (November 2018) is that "*For ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone*…" and that "*A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter*".

The HRA of emerging Minerals Local Plan outlines known effects of mineral working in proximity to sensitive habitats and identifies (quoting Air Quality Management Guidance on the Assessment of Mineral Dust Impacts for Planning[1]) that "*it is commonly accepted that the greatest impacts* [of dust deposition] *will be within 100 m of a source".* Indeed, it is widely recognised effects of dust are experienced >100m from point of origin, and noise and vibration are unlikely to attenuate over short distances. This is recognised in the scheme's Environmental Statement (Chapter 11) which states (at 8.3.11) that "*in the absence of mitigation, dust particles may travel into the wider landscape, which over time, could collate to cause problems, particularly along watercourses… adverse dust impacts from sand and gravel are uncommon beyond 250m of the operation and have considered*

[1] Guidance on the Assessment of Mineral Dust Impacts for Planning, Institute of Air Quality Management, May 2016 (v1.1)

that all designated sites detailed above are likely to have a negligible effect from any dust arising from the proposed development".

As per the paragraph 8.8 of the 2019 Ecological Impact Assessment, the 2021 Phase 1 working diagram appears to illustrate extraction being undertaken <15m from ancient woodland boundaries. This would appear to be non-compliant with Natural England advice described above.

It appears that the Dust Impact Assessment, prepared by Vibrock Limited (November 2019) has not recognised or assessed the concomitant Wolverley Lodge or Wolverley Carr ancient woodlands as sensitive ecological receptors. Indeed, the closest ecological receptor considered by the Dust Assessment is Gloucester Coppice Local Wildlife Site (LWS), located >200m from the site boundary and shielded from effects of dust deposition by both Wolverley Lodge and Wolverley Carr ASNW (as well as the intervening Canal and River LWS).

As the dust assessment appears not to have assessed effects on non-designated sites of ecological significance, and given the aforementioned risks of deterioration of ancient woodland sites from effects of mineral working, particularly given the apparent departure from Natural England guidance on ancient woodland buffers, **I would respectfully reiterate the request for information regarding the proposed mitigation strategies, their suitability for protection of ancient woodland habitat, and compliance with Paragraph 180.c. of the NPPF (July 2021).**

I would particularly welcome further clarity on screening barriers or other mitigation measures proposed capable of preventing deterioration of the ancient woodland, or, other clear demonstration as to how a 10m buffer to ancient woodland site is considered sufficient.

To be clear, I feel that an acceptable mitigation strategy could be achieved here, if buffers to ancient woodland were demonstrably compliant with Natural England advice (i.e. 15m root protection buffer) and also integrated above-ground screening measures preventing (or adequately reducing) effects of dust, light and noise.

Nevertheless, a separate question to effects of quarrying on woodland condition, is whether those effects would cause an unacceptable adverse impact upon dormice, if present.

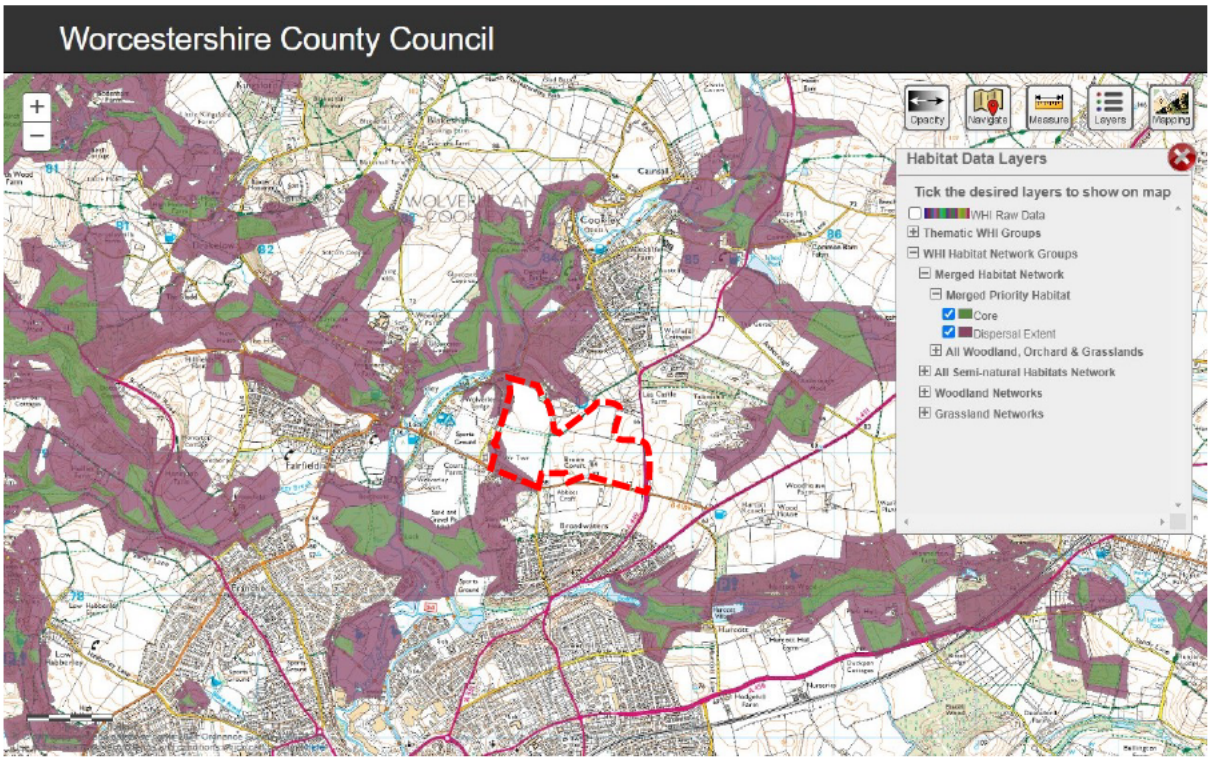
I note that the applicant states the proposed effects are **not considered to constitute licensable activity, and that they could be reasonably controlled through mitigation strategy**. I am aware of domice nesting in areas receiving very high disturbance from noise, dust, vibration and light (M5 motorway hard shoulder) and while this may be indicative of dormouse dispersal to suitable habitats rather than acclimatisation to land-use change, as may be the case here, it does indicate that a level of tolerance to anthropogenic disturbance occurs (at least where both suitable dormouse habitat and opportunities to colonise/disperse exists). On balance, I am minded to agree with the project ecologist; the potential effects of disturbance on foraging and commuting dormouse, as may arise from mineral working (particularly in light of possible mitigation measures, including control of artificial light at night, dust control and stand-off buffers, notwithstanding my earlier contention with regards buffer distance to ancient woodland) mean that impacts on dormice (if present) would be temporary, reversable and unlikely to be of such sufficiently significant magnitude as to compromise the favourable conservation status of the species, hence triggering requirement for derogation licence.

I'd stress again that the rationale that no unacceptable adverse impacts upon ancient woodland condition or dormouse activities therein are predicated upon acceptable mitigation measures satisfactorily addressing effects of noise, dust, vibration and light upon woodland habitat and its fauna. Additionally, I would reiterate that we requested further information on these protective measures, particularly with regard their compliance with Natural England standing advice for ancient woodland.

Assuming appropriate avoidance and mitigation strategies can be implemented, as I do not anticipate an EPS derogation licence application to Natural England would be needed, there would be no reason for the Minerals Planning Authority to consider the three tests set out in Regulation 55 of The Conservation of Habitats and Species Regulations 2017 prior to determining this planning application.

Focusing then on potential effects of fragmentation on dormouse, should they occur here, I have referenced the Worcestershire Habitat Inventory to see if a coherent habitat network exists in the locality which might be under pressure of deterioration from any disturbance effects. I include below an image of the combined priority habitat network although of greater relevance to dormice would be the woodland habitat network as broadleaved and particularly ancient woodlands are key habitats for dormice. In practicality there appears to be no significant difference between the woodland and combined priority habitat networks in this location. I'd highlight the 'core' areas of priority (habitats of principle conservation interest as listed at Schedule 40 of the Natural Environment and Rural Community Act (2006) illustrated below in green, and the 'dispersal extent' based on recorded movement

distances of generic and focal faunal species, calculated using 'least-cost' network analysis, as illustrated below in purple:



My interpretation of WHI mapping remains unchanged from my consultation response of November 2020: that "*effects of habitat severance, including built development and highway, are significant for dormouse, as this is a species with limited mobility and very specific habitat requirements… and I believe the lack of connectivity to other blocks of ancient woodland significantly reduces risk of dormouse dispersal to and occupation of woodland or hedgerow features…*".

The site does not appear to contain any recognisably important habitat networks which of themselves would be a sensitive receptor for adverse impacts. A north-south habitat corridor abuts the western site boundary and, if it were not currently severed by the B4189 Wolverley Road (highways posing a significant barrier to movement of this ostensibly arboreal species), this corridor would abridge the woodland of the Staffordshire and Worcestershire Canal Local Wildlife Site with the various priority habitats of Puxton Marsh SSSI, located to the south-west of the site. However, this habitat corridor will be retained (and enhanced) through proposals. I consider any severance effects therefore unlikely to critically prevent dispersal of dormice (if present) across the local landscape, because the habitat network here is already significantly fragmented by highway and watercourses.

I maintain the position that impacts from mineral working which may potentially adversely impact dormouse (if present here), could be reasonably controlled through an appropriate avoidance or mitigation strategy. I also note that this is the approach I believe to be approved by WFDC for the nearby Lea Castle Village development where a single dormouse nest was identified in ancient woodland near to the development boundaries, and through a Mitigation Strategy the risk of adverse effects on woodland condition and disturbance of dormouse populations was considered to be appropriately controlled (Amec Ecology Report, Ref: L35499R037i2, August 2015 and Ecological Strategy, TEP Ref; 803.03.002, April 2020).

Lastly, I note that neither Worcestershire Wildlife Trust nor Natural England have raised objections with regards to dormouse.

In conclusion, I believe matter 4 could be satisfactorily addressed if further information on ancient woodland buffers/protective measures is provided, and I believe that if the applicant were amenable, such protection measures could be reasonably secured through imposition of suitably worded condition.

Veteran and Ancient Trees

In my November 2020 consultation, I requested additional information regarding tree buffers particularly around T22. I note an objection raised by the Woodland Trust with regards protection measures of T22 and concerns raised by the WFDC Tree Officer with regards both T22 and (by dint of proximity of extraction) T23.

I note from both Natural England standing advice and Woodland Trust consultation that the protective zone around veteran trees should by no less than 15 times the stem diameter (or 5m beyond canopy edge if a larger figure). Mr Smithyman has confirmed (via email dated 31/04/2021) that a minimum protective buffer of 18m (meeting requirements of 15 times stem diameter) will be an agreeable approach. If the applicant has determined this solution to be workable, I am content for the proposed buffers to be implemented. However, I would caution that the RPA of 15 times stem diameter is a minimum figure; we would be unlikely to look favourably on a future request to reduce or remove the proposed protective zone.

The cross-sectional illustrations provided by Mr Smithyman (via email 30/4/2021) is gratefully received and considered helpful in understanding T22's placement in its future landform. There will inevitably be a 'mounding' effect, which may well appear incongruous in its local landform, however I will defer to my colleagues' expertise on such matters as I

believe it will have no significant ecological implications as I understand that the tree's root system and hydrology will be adequately protected and monitored.

Biodiversity Net Gain

Moving on to the matter of Biodiversity Net Gain. I welcome the stated headline figures but re-iterate my comments of November 2020 insofar as **I would require submission of the DEFRA metric spreadsheet in order to review and comment on the evidence itself**, in compliance with Clause 6.11 of BS42020:2013.

It should also be noted that Appendix 1 of the WCC planning validation document is clear biodiversity net gain audits should be submitted accompanied by mapping shapefiles. This is so that claims of biodiversity net gain can be appropriately recorded, evaluated and monitored over the aftercare period and beyond. This should not be seen as duplicative work as an appropriate baseline dataset will be an essential component of a Biodiversity Management Strategy (or similar document) ensuring that extent and condition of proposed biodiversity gains will perform to the timescales proposed. Such a document would accord with C776a Biodiversity Net Gain: Good Practice Principles for Development.

Requests for further clarification

For your convenience and by way of summary, the key items which I would appreciate further clarity on are:

- proposed ancient woodland protection measures and their compliance with NPPF para 180.c
- Biodiversity Net Gain metric data (a completed DEFRA Metric 2.0 spreadsheet)

Assuming that there are no further clarifications required, I've no further additions or amendments to my previous consultation response but will copy below a set of recommended conditions for your consideration, based on wording in BS42020:2013. Please note that I will defer to colleagues in NWWM and EA with regards suitable condition wording for control and monitoring of ground and surfacewater.

Construction and Environmental Management Plan (CEMP)

Prior to commencement, a detailed CEMP should be submitted for the written approval of the CPA and include consideration of:

a) Risk assessment of potentially damaging construction activities.
b) Identification of "biodiversity protection zones".
c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction.

This may be provided as a set of method statements and should include working practices to minimise impacts of noise, dust, vibration and to avoid impacts to roosting bats in trees to be removed, nesting birds, otter, badgers, hedgehog and any other wildlife considered to be at risk. Measures to mitigate operational-phase lighting impacts and to minimise risks of pollution events in line with EA's now withdrawn PPG5 guidance should be included.

d) The location and timing of sensitive works to avoid harm to biodiversity features.
e) The times during construction when specialist ecologists need to be present on site to oversee works.
f) Responsible persons and lines of communication.
g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the operational period strictly in accordance with the approved details, unless otherwise agreed in writing by the Minerals Planning Authority.

Landscape and Ecological Management Plan (LEMP)

A LEMP shall be submitted to and **approved in writing by the Minerals Planning Authority prior to the commencement of the development**.

I'm supportive of the proposed Landscape Management Plan proposed by my colleague Adam Mindykowski (email dated 20th Mark 2020) and concur that a period of 10 years landscape maintenance for aftercare and monitoring would be helpful to ensure that Biodiversity Net Gain has been achieved (noting that the emerging Environment Bill will, when enacted, require a 30 year monitoring and enforcement period for habitat measures implemented to achieve the stated biodiversity net gain). However, I note that the only matter not fully addressed in Mr Mindykowski's proposed condition wording is as relates to explicit targets of 'success' for proposed measures, the ongoing monitoring regime and remedial measures should objectives fail to be met within timescales set out. I therefore

suggest that some of this detail may be more appropriately located within a separate Biodiversity Monitoring Strategy (below). However, should you wish to amalgamate these conditions I suggest that the LEMP should also include BMS details including specification of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The LEMP should also therefore set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details
As a minor matter may I also request that the LEMP explicitly requires the collection and removal of plastic tree guards on completion of aftercare, or specifies use of bio-degradable tree guards, is explicit that application of insecticide or fungicides will be avoided as will use of peat anywhere within the restoration scheme. No fertilisers will be required or are desirable within the acid grassland habitat.

Lighting Strategy

Prior to commencement, a "lighting design strategy for biodiversity" for the development site shall be submitted to and approved in writing by the Minerals Planning Authority.
The strategy shall integrate work to date identifying 'dark corridors' within and adjacent to the site and:

a) identify those areas/features on site that are particularly sensitive for bats and invertebrates and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
b) show how and where external lighting will be installed, through provision of appropriate technical specifications including optic photometric data and contour plans (in both horizontal and vertical planes) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.
mitigating technology including timers, movement detection, dimming and part-lighting, strategy, warm colour spectra, shields/baffles/cowls etc designed to protect 'dark buffers' around identified sensitive habitats are all welcomed, these measures should be clearly illustrated spatially within the lighting strategy.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the Minerals Planning Authority.

Biodiversity Monitoring Strategy (BMS)

No development shall take place until a Biodiversity Monitoring Strategy has been submitted to, and approved in writing by the Minerals Planning Authority. The purpose of the strategy shall be to ensure the effectiveness of all delivered biodiversity measures for a period of no less than 10 years. The content of the Strategy shall include the following:

a) Aims and objectives of monitoring to match the stated purpose.
b) Identification of adequate baseline conditions prior to the start of development.
c) Appropriate success criteria, thresholds, triggers and targets against which the effectiveness of the various conservation measures being monitored can be judged.
d) Methods for data gathering and analysis.
e) Location of monitoring.
f) Timing and duration of monitoring.
g) Responsible persons and lines of communication.
h) Review, and where appropriate, publication of results and outcomes.

A report describing the results of monitoring shall be submitted to the Minerals Planning Authority at intervals to be identified in the strategy. The report shall also set out (where the results from monitoring show that conservation aims and objectives are not being met) how contingencies and/or remedial action will be identified, agreed with the Minerals Planning Authority, and then implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The monitoring strategy will be implemented in accordance with the approved details.

To this end I would ask that the BMS also included periodicity for habitat extent and condition assessment making use of the DEFRA Biodiversity Metric 2.0 and Technical Supplement (or other tool with prior written approval of the CPA). Both metric and supporting assessment report should periodically be submitted to demonstrate monitoring and effective delivery of net gain measures proposed.

Explanatory memorandum

To comply with:
Policies CP13 and CP14 of the adopted Wyre Forest District Council Core Strategy (adopted December 2010),
Policies 11D and 14 of the emerging Wyre Forest District Council Local Development Plan.

Policy MLP21 (Biodiversity) of the emerging Worcestershire Minerals Local Plan (please note that this will become Policy MLP31 as a result of proposed main modifications currently undergoing public consultation).

I trust this meets your requirements but please don't hesitate to contact me if I can be of further assistance.

Yours sincerely,

Cody Levine