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Wednesday, 07 September 2022

Application reference number: PAP/2021/0663

Location: Land On The North East of J10 M42 Dordon/A5

Proposal description: Outline planning permission for development of land within Use Class B2 (general industry), Use Class B8 (storage and distribution) and Use Class E(g)(iii) (light industrial), and ancillary infrastructure and associated works, development of overnight lorry parking facility and ancillary infrastructure and associated works. Details of access submitted for approval in full, all other matters reserved

Dear Andrew

Thank you for your consultation on the above application. As discussed my comments are in relation to Biodiversity Net Gain only. My comments are based on the following documents:

- Baseline Ecological Appraisal, Aspect Ecology, December 2020
- Technical Briefing Note: Biodiversity Impact Assessment, Aspect Ecology, Ref: 1005971 BIA vf4, November 2021.

Baseline habitats

The technical briefing note includes a biodiversity metric calculation using the WCS BIA calculator version 19.1. The baseline habitats used in the metric area broadly representative of those found within the site, although the mix of grassland, tall herb and scattered scrub found at the field margins has been classed as 'improved grassland', which is the lowest-scoring of those three habitats. Where overlaying habitats or mosaic are present the habitat of highest value i.e. scattered scrub should be used, or else the area should be divided into approximate proportions of each habitat, with a separate row in the metric for each.

Proposed habitats

The predicted gain of 19.26 area units is based largely on the following habitat creation:

- 2.14ha of species-rich semi-improved grassland, to reach moderate condition in 15 years (6.71 units)
- 0.57ha of scattered scrub, good condition in 15 years (4.02 units)
- 1.14ha of high distinctiveness wetland habitat in moderate condition (equivalent to inundation vegetation), presumably in the attenuation feature at the south of the site (12.44 units)

- 3.40ha of traditional orchard priority habitat managed to reach moderate condition in 10 years, within the blue line boundary (29.14 units).
- 10.42ha of broadleaved plantation woodland on site and within the blue line boundary (16.74 units on-site, 4.10 units off-site)

In the absence of a detailed landscape scheme the above habitat creation is somewhat ambitious. My specific observations are as follows:

1. In order for a diverse mix of species to establish, the wildflower grassland must be left to grow long in spring and summer with a single annual cut in late summer and arisings removed from the site or left in piles away from the grassland. Additional cuts in the winter months may be required in the first few years to reduce nutrient levels and slow the growth of competitive grasses.
2. It is not clear from the indicative landscape plan in the Technical Note where the scattered scrub will be: Presumably this will be a feature of the grassland areas (bringing the total area to 2.71ha) and maintained through occasional thinning of trees/shrubs. **More information on this habitat is required prior to determination.**
3. In order to function as a wetland habitat the attenuation feature must contain water or waterlogged ground for most of the year. Does this conflict with the surface water drainage scheme? If it is not possible to include wetland habitat within the SuDS then a more appropriate habitat, depending on management (i.e. amenity grassland, tall herb or scrub) should be selected for this area. It may be that part of the area will be wetland and the higher banks may be terrestrial habitat. The time taken to reach target condition will depend on the habitat. **More information on this habitat is required prior to determination.**
4. I could not find any further information on the orchard area shown on the indicative landscape plan. Establishment of a traditional orchard in moderate condition can be achieved in 10 years if the trees are managed for fruit production and the area also includes associated wildflower grassland, hedgerows, scrub and log piles. The units generated by the proposed orchard are a significant part of the predicted biodiversity gain and appropriate management of this area is essential for this gain to be realised. **More information on how orchard management will be secured is required prior to determination.**
5. I could not find a copy of the Indicative Landscape Plan, which shows the orchard area, outside of the Technical Note. **Has a copy of this plan been formally submitted?**
6. Long-term management of the plantation woodland should include selective thinning and regeneration/understorey planting to establish a varied canopy height.
7. Monitoring of all habitats by an ecologist will be required, with remedial action taken if habitats are not reaching their target condition.

The required habitat management and monitoring for a period of 30 years, including who will be responsible for delivering the management, must be included in a Landscape Ecological Management Plan (LEMP).

Recommendations:

Pre-determination: Clarification on scattered scrub, wetland, orchard habitats as set out above, and revised BIA to reflect proposed habitats, if required.

Following receipt of additional information, the management of all habitats set out in the BIA should be secured through a condition for a LEMP, for which I will provide recommended wording.

I hope the above information is helpful. Please get in touch if you wish to discuss this further.

Yours sincerely,

