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By Email/Post: clindley@dpds.co.uk

Our Ref: EDPL/293/KH/eb

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archaeology

built heritage

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ecology

protected species

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EIA

Dear Emma,

Consultation on Ecology Issues Relating to the Outline Application for the Development Proposals at Field Farm, Stapleford, Nottingham (11/00758/OUT)

Thank you for forwarding on the recent consultation responses from Natural England (NE) dated 27 November 2012 and Nottinghamshire Wildlife Trust (NWT) dated 29 November 2012, regarding the amended proposals for the outline application for residential development at Field Farm, Ilkeston Road, Stapleford, received on 6 December 2012. These responses are based on the submission of additional technical information and amendments to the masterplan to Broxtowe Borough Council on 9 November 2012 with respect to outline application 11/00758/OUT.

We acknowledge that with respect to European Protected Species no objection to the development proposals is raised by Natural England. However a holding objection has been maintained by NWT pending further clarification of a number of issues raised by Ben Driver, Conservation Officer at NWT, as detailed within his email correspondence of 29 November 2012.

Whilst no concerns are raised by NWT with respect to the scope of ecology work employed when collating the necessary data to support the application, clarification on a number of key issues has been sought. These primarily relate to the need for further detail regarding the landscaped buffers proposed adjacent to sensitive ecological habitat within the



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development site, and with respect to those ecological enhancement and protection measures proposed to ensure the safeguarding of protected species and habitats throughout the construction and operational phases of the development.

This letter seeks to address each of the outstanding concerns raised by NWT. In addition, the following supporting information is also provided and referred to throughout this letter:

- Cameo Area B: This provides an illustration of the offset distance of the development from Boundary Brook along its western section (extracted from the submitted Design and Access Statement, November 2012).
- Illustrative Masterplan Revision G (with measurement annotation): Approximate measurements of the width of proposed buffers and habitats to be created across the site are illustrated here; and
- Illustrative Habitat Retention Plan: Habitats and spaces to be retained (dark green), removed (light blue & dark blue) and created (light green and green) are highlighted here.

In addition, this letter should be considered in conjunction with EDP's Ecology Appraisal Update Report dated in October 2012 (**C_EDP293_08**, hereafter referred to as the Ecology Report) recently submitted to Broxtowe Borough Council, and upon which NWT's consultation response is based.

Concerns Raised

Boundary Brook

NWT considers the ecological impacts upon Boundary Brook, given its potential to act as a dispersal corridor for a number of species, and requires for the brook to be adequately buffered from development. Whilst NWT welcomes the proposals for additional planting and provision of open space to be provided along the western section of Boundary Brook, they wish to be assured that this area is wide enough. They consider the 8m wide buffer zone proposed within the Ecology Report to be inadequate in protecting the brook from recreational disturbance.

Recommendations within the Ecology Report include the requirement for all designated walkways to be located a minimum of 8m away from Boundary Brook (Section 4.71 of the Ecology Report), so as to minimise disturbance to this watercourse and its banks. The brook itself is considered to be sub-optimal for water vole, being likely only intermittently used for dispersal purposes during favourable conditions. In addition it is not considered likely to support white-clawed crayfish. As such, the provision of an 8m buffer between the banks of Boundary Brook and the development footprint is considered to be adequate in mitigating against any significant detrimental impacts to the watercourse which may arise as a result of the proposed development.

However in response to the initial consultation responses received with respect to the Outline Application, further amendments to the masterplan have been made. As such, the revised proposals for the site recently submitted as part of the amended Outline Application incorporates a much wider corridor along the full length of Boundary Brook, comprising grassland habitat and proposed tree planting.

With reference to Illustrative Masterplan Revision G and Cameo B attached to this letter, a vegetative corridor is proposed along the western section of Boundary Brook, measuring approximately 14m to 17m in width between its banks and the proposed residential footprint. Along its north eastern section, retained woodland along Boundary Brook provides a natural buffer measuring between 10m and 20m in width, whilst additional corridors of open space are further proposed between this retained woodland habitat and the development footprint, measuring approximately 5m to 13m in width. The extent to which these vegetative corridors are to be provided between Boundary Brook and the development footprint is further highlighted within the Illustrative Habitat Retention Plan, attached where new tree planting and open space habitat is proposed.

The proposed buffer areas illustrated within the revised masterplan re-submitted to Broxtowe Borough Council exceed the recommended 8m widths proposed within the Ecology Report. Together with the general recommendations made in relation to the management of the brook and of retained and created habitats within the proposed development site (Section 4 of the Ecology Report), significant detrimental impacts upon Boundary Brook arising from the proposed development are thus unlikely. The functional integrity of the brook as a key dispersal corridor is therefore not considered to be significantly affected by the development proposals.

Stapleford Hill Woodland Local Nature Reserve

NWT also wish to be assured that the northern part of Stapleford Hill Woodland Local Nature Reserve (hereafter referred to as LNR) will be adequately buffered from the development, given its susceptibility to noise and lighting disturbance where gardens may back on to the woodland. Whilst NWT welcomes those measures included within the Ecology Report with respect to protecting the LNR, including the provision of vegetative buffers adjacent to the eastern and north eastern boundaries of the proposed development site, they wish to be assured that the proposed buffer is wide enough to function effectively.

With reference to Illustrative Masterplan Revision G, new tree planting is proposed along the eastern and north eastern boundaries of the proposed development site so as to provide an adequate offset between the LNR and the development footprint. Such planting, as detailed within Section 4.11 of the Ecology Report, will measure a minimum of 10m in width and provide a continuous, wooded belt adjacent to key habitats and dispersal corridors located adjacent to the site, including the LNR to the immediate east and railway line to the immediate north. In addition, recommendations are also made with respect to the treatment of any residential curtilages which lie adjacent to proposed vegetative buffers, including the requirement for such boundaries to be defined through use of robust fencing materials which will be a matter for the detailed design submitted for subsequent approval at the Reserved Matters stage.

It is therefore considered that the proposed woodland belt is of sufficient width to function effectively both as a vegetative buffer to the adjacent LNR and as a habitat refuge and dispersal corridor in its own right. Together with the more general recommendations made in relation to mitigating against the impacts of increased recreational pressure (Section 4.12 - 4.13), it is therefore considered that such buffers will ensure no significant impacts upon the LNR will arise as a result of the development proposals.

S106 Contributions

NWT wish to see a firm commitment and a mechanism to securing commuted sums with respect to the long term management of the LNR. In addition, they seek to ensure that those measures proposed to protect and enhance the LNR with respect to recreational use are also applied to the adjacent Pit Lane Recreational Area north of the site. They also request for provisions to be made with respect to other parks and open space areas in the locality.

With respect to providing financial support to the management of the adjacent LNR and additional areas of public open space within the vicinity of the site, we understand that wider discussions are currently being held with Broxtowe Borough Council. No further comment is therefore provided here.

Balancing Ponds

NWT welcome the inclusion of balancing ponds as part of the sustainable drainage system proposed for the site. However they request for the central pond, currently surrounded by the residential footprint, to be repositioned to the edge of the site or adjacent to retained ecological features such as the Brook or plantation woodland area.

With reference to Illustrative Masterplan Revision G, we understand NWT's aspirations for the relocation of the central balancing pond towards retained ecological features so as to further enhance habitat connectivity across the site. Indeed this has been achieved through the location of the second balancing pond adjacent to Boundary Brook at the western end of the site. However the location of the central pond cannot be significantly altered due to the topography of the site and other design and engineering constraints.

The revised masterplan has however sought to provide some connectivity to other areas of open space by relocating this pond adjacent to a key footpath route and belt of tree planting running northwards from Ilkeston Road. This belt measures approximately 10m in width and connects directly to additional habitats created adjacent to Boundary Brook, including the second balancing pond located to the west.

Barn Owl Impacts

NWT welcomes the consideration given to barn owl as part of the ecological assessment undertaken of the proposed development site. However they disagree that the site is of negligible potential for barn owl, with foraging habitats present on site in the form of field

margins, plantation woodland and riparian habitat (Boundary Brook). They also suggest that barn owl would opportunistically forage over the arable fields on site, with the development proposals likely resulting in increased disturbance. They request for habitat enhancements to be included within the development proposals, including the provision of grassland habitat within retained arable fields or located along the northern edge of the site so as to provide connectivity to the Pit Lane Recreational Area and the wider countryside to the north.

No suitable roost sites for barn owl were recorded for the proposed development site itself during surveys undertaken in 2010 and 2012, although a breeding pair was known to roost approximately 400m to the north of the site.

With respect to potential foraging habitat within the vicinity of this breeding roost, the proposed development site itself is considered to be sub-optimal. Rough grassland habitat, considered to be the best habitat for all-year-round prey¹, is absent on site, although short grassland habitat is present beneath the otherwise dense, 3-hectare woodland plantation area which extends north westwards across the site. The dense canopy cover here is considered to affect the catchability of prey however, whilst additional, small pockets of grassland aligning the arable fields and Boundary Brook are otherwise encroached by dense stands of scrub and tall ruderal vegetation.

We do agree that the arable fields comprising the majority of the proposed development area may offer some limited foraging opportunities. However such non-grassland habitats are considered to be of little value as permanent foraging resources for this species², with arable fields unlikely to provide suitable habitat for field voles, their primary item of prey, whilst other items of prey such as wood mice are likely to be limited in abundance whilst being available at only certain times of year. In addition, the field margins associated with the arable fields within the proposed development site are mostly absent or relatively narrow and thus unlikely to provide significant foraging opportunities.

Habitats within the wider landscape beyond the proposed development site are considered to offer more suitable foraging habitat for barn owl however, such as the area of unmanaged grassland habitat comprising approximately 3.6 hectares located to the east. Unmanaged grassland margins along Nottingham Canal to the north of the proposed development site may also provide some potential foraging corridors across the landscape, although agricultural land under both arable and pastoral management otherwise dominate the wider landscape.

Considering the above, no impacts are considered to arise upon the barn owl breeding roost during the construction or operational phases of the development, given its distance from the proposed development site³. In addition, whilst we acknowledge that barn owl may opportunistically forage within the development site, we do not consider that those foraging resources present contribute significantly to the local barn owl population. It should also be noted that the vast majority of potential foraging habitat on site, comprising grassland habitat

¹ Barn Owl Trust (2012) *Barn Owl Conservation Handbook*. Pelagic Publishing, Exeter

² Sawyer C (2012). *Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment*. Wildlife Conservation Partnership.

³ Sawyer C (2012). *Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment*. Wildlife Conservation Partnership.

beneath the woodland plantation, is to be retained as part of the proposals; the arable fields being the primary habitat proposed for loss.

However we acknowledge that biodiversity enhancement opportunities do exist within the proposed development site with respect to barn owl. Whilst it is not possible to provide habitat enhancements within those retained arable fields located northwest of the proposed development footprint, as suggested by NWT, we do agree that the appropriate management of all areas of proposed informal open space should be undertaken with barn owl in mind. Such management measures could include the maintenance of a rough grassland corridor along Boundary Brook and woodland habitat, particularly along the northern boundary of the proposed development site as suggested by NWT, so as to enable the small mammal population to develop. These measures are already recommended for the development site with respect to reptiles (see Section 4.67 of the Ecology Report).

In addition, the retained woodland plantation area could also be sensitively managed for this species, such as through opening up its otherwise dense tree canopy through appropriate and selective felling/coppicing, whilst allowing rough grassland habitat to develop beneath. It is considered that such management measures can be specified within the Landscape and Ecology Management Plan for the site.

Proposed Conditions

NWT wish to see those measures to safeguard protected species, as detailed within the Ecology Report, to be secured via condition. In addition, the preparation of a Landscape and Ecology Management Plan and Construction Method Statement should also be secured by condition.

We support NWT's request for appropriate planning obligations to be in place to ensure the safeguarding of species and habitats throughout the construction and operational phases of the proposed development. We assume that Broxtowe Borough Council will condition the need for such documents to be provided to the Council for approval prior to the commencement of any works.

Additional Information

As requested by Ben Driver (NWT) during our previous telephone discussions and for ease of reference, I provide you with the following additional information in support of the development of the application site:

Habitats Proposed to be Retained, Lost and Created

Habitat Type	Proposed Change	Approximate Area (hectares)
Broadleaved Woodland	Retained	1.01
	Removed	0
Plantation Woodland	Retained	2.59
	Removed (TPO area)	0.19
	Removed (non-TPO area)	0.21

Habitat Type	Proposed Change	Approximate Area (hectares)
Proposed Tree Planting	Created	1.13
Total Woodland Cover	Retained	3.6
	Removed	0.4
	Created	1.13
	Retained	0
Ponds	Removed	0
	Created	1
	Retained	0
Grassland (other areas of informal and formal open space)	Removed	0
	Created	0.61
	Retained	0

Table EDP 1: Habitats to be retained, removed or created as part of the development proposals at Field Farm, Stapleford (refer to Illustrative Habitat Retention Plan attached)

Habitat Balance Sheet

Habitat Type	Phase	Approximate Area (hectares)
Woodland	Pre-development	4
	Post-development	4.73
Ponds	Pre-development	0
	Post-development	1
Grassland (other areas of informal and formal open space)	Pre-development	0
	Post-development	0.61
Total	Pre-development	4
	Post-development	6.34
Net Change		+2.34

Table EDP 2: Habitat change proposed following residential development at Field Farm, Stapleford

Buffer Habitat

Ecological Receptor	Buffer Proposed	Approximate Width of Buffer (m) (min/max/mean)*
Boundary Brook	Tree planting and grassland habitat creation	8/29/17
Stapleford Hill Woodland LNR	Tree planting/woodland belt creation	10/10/10
Ponds – west	Grassland habitat and scattered trees	9/39/19
Ponds - central		12/27/17

Table EDP 3: Vegetative buffers proposed as ecological mitigation and enhancement measures at Field Farm, Stapleford (*approximate buffer widths extracted from Illustrative Masterplan Revision G attached)

Summary

As per the conclusions of the Ecology Report submitted as part of the revised Outline Application for the proposed residential development at Field Farm, Stapleford, it is considered that no adverse impacts upon protected and notable species known or likely to be supported by the proposed development site will arise given the ecological enhancement, mitigation and

management measures proposed as part of the development. This view is further supported by Natural England, with no objection raised to the development proposals on ecological grounds.

With respect to protected and notable habitats supported on and within the vicinity of the proposed development site, we acknowledge NWT's concerns and have sought to clarify within this letter those issues raised with respect to the revised masterplan recently submitted. As discussed above and detailed within the Ecology Report, we consider that the proposed ecological enhancement, mitigation and management measures recommended are sufficient to ensure that no significant adverse impacts upon protected and/or notable habitats will arise following the residential development of the site.

We believe that such ecological enhancement, mitigation and management measures proposed can be secured through the necessary planning obligations and at future Reserved Matters stages. We therefore conclude that the site poses no in principle constraints to its future development, whilst also providing opportunities for biodiversity enhancement and net biodiversity gain to be delivered as part of the proposals (as illustrated within **Table EDP 2**).

We trust that the above is sufficient to progress the determination of Outline Application 11/00758/OUT for the proposed residential development at Field Farm Stapleford with respect to ecological matters. Please do not hesitate to contact me however should you have any further queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'KH', is positioned below the 'Yours sincerely' text.

Kate Henson

Dr Kate Henson BSc (Hons), PhD, MIEEM
Principal Ecologist

ENC Cameo Area B
Illustrative Masterplan Revision G (with measurement annotation)
Illustrative Habitat Retention Plan

CC Ben Driver (Nottinghamshire Wildlife Trust)
Chris Lindley (DPDS)